



Home Office Type Approval Briefing Note | June 2023

What is Home Office Type Approval?

Home Office Type Approval (HOTA) is a testing and certification process by the Home Office that enforcement technology must pass before evidence from enforcement devices can be admissible in UK courts. If a device does not have HOTA, then the evidence from the device is not able to be certified and must be adduced by a witness for its accuracy. HOTA is administered by the Home Office Police Powers Unit, but the scientific review process is run by the Defence Science and Technology Laboratory (DSTL), which is part of the Ministry of Defence.

Why is the current HOTA process not working?

ITS UK members have reported that decisions often take an excessively long time to get made, procedures are opaque and decisions difficult to understand:

Enforcement technology providers have reported significant delays, sometimes of around 3 to 5 years, to even get to the next stage towards gaining approval for their products. There are examples from some suppliers of testing that had been submitted in 2018 that was still outstanding for decision notices to be issued in November 2022.

Since HOTA was outsourced from the Home Office's inhouse Science Branch to DSTL, suppliers are now not permitted to speak with DSTL scientists meaning there is no opportunity to explain or justify their submissions.

The DSTL communication policy is to not have or to minimise direct communications between assessing scientists and technical staff from manufacturers, making this situation worse.

DSTL now controls the "Collision Reduction Equipment" Handbook, which sets out the standards for enforcement equipment such as speed and red light systems. The Handbook was recently re-issued without any notice or consultation with the industry; it contains information that is not up-to-date, is out of touch with best practice in enforcement technology homologation in the rest of the world, and is often in direct contradiction to other Police evidential gathering and handling protocols. There are concerns that it is seeking unreasonable demands for the apparent proof of technical perfection before issuing approval. The highly prescriptive nature of the Handbook stifles innovation, rather than stimulating it, as an outcome-driven Handbook would.

What is the impact of this situation?

Reduced safety: New devices and technology that could be improving the safety of the road network are not being taken up, thereby reducing transport authorities' ability to keep road users safe.

Loss of jobs and investment in the industry: The transport technology sector, which is conservatively estimated at around £1.5bn in economic value, is impaired by its ability to get new products and services to market.



ITS UK member organisations have told us this is impacting the ability to maintain and recruit staff, with long and unpredictable timescales making it uneconomical for suppliers to invest in the UK. Some manufacturers have highlighted the police blaming manufacturers for not having matters relating to HOTA resolved. Some manufacturers are even talking about pulling out of UK as it is too difficult and unpredictable to achieve approval.

Reduces the ability to innovate: The process hinders the sector's ability to innovate and develop new products. Not only do the delays deter new products from coming to market, but it bars truly innovative solutions from being proposed as these solutions often don't conform with the handbook that defines how an approved system can operate. Given no dialogue is allowed between the supplier and DSTL, this means many innovations that could save lives, support economic growth and which the UK could export overseas, fail to get approved.

Obsolescence of current technology: Existing HOTA devices are becoming obsolete with no clear path to upgrading them. If a sub-module within a device reaches the 'end of life', it is currently not possible to put a compatible alternative in as it would need to be reapproved. Some suppliers have reported waiting years for a simple component change approval. Previously this used to be relatively straightforward process, with a conversation and documentation review, perhaps followed by some limited testing but this capability seems to have gone. This also leads to worsening road safety outcomes, as fewer HOTA devices can be used on the road network.

What would the industry like to see?

1. **Regular dialogue:** A return of monthly meetings where assessors from DSTL would meet with manufacturers.
2. **Timelines for approval:** Sensible timelines could be agreed for a project at the application stage and assets within DSTL can be allocated to manage the application to its conclusion.
3. **Fasttrack process for new modifications:** That a new modification process for the approval of already approved equipment could be quickly agreed.
4. **Update SpeedMeter Handbooks:** There was agreement that the speedmeter handbooks should be updated as a matter of urgency. These should be changed to align to existing standards and to concentrate on the requirements for the record produced by the equipment rather than how the equipment operates.

Intelligent Transport Systems UK

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