

The Home Office Type Approval (HOTA) Consultation for Road Traffic Law Enforcement Devices (RTLED)

Joint response from the [Parliamentary Advisory Council for Transport Safety \(PACTS\)](#) and [Intelligent Transport Systems \(ITS\) UK](#)

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Question 14: Benefits and Disadvantages of HOTA in Product Marketing

PACTS and ITS UK recognise the significance of the Home Office Type Approval (HOTA) in promoting road traffic law enforcement devices (RTLED). HOTA serves as a mark of credibility, essential for ensuring that products meet high standards of accuracy and reliability. This not only facilitates market entry and expansion by offering a competitive edge but also reassures international and UK clients of product compliance with stringent requirements.

However, the HOTA process presents challenges, including its lengthy and resource-intensive nature, which can delay product launches and the adoption of innovative technologies. Stringent requirements may also restrict the scope of device functionality, limiting the utilization of multi-purpose enforcement technologies. Furthermore, updating components or operating systems of HOTA-approved equipment is neither cost-effective nor timely, often rendering updates outdated by the time they are approved. The industry faces challenges due to outdated and prescriptive standards, and the lack of direct communication with DSTL scientists has further complicated the approval process.

This has meant that, in some cases, manufacturers have highlighted the fact that a device does not need HOTA approval as a benefit in their product marketing, when in fact HOTA should be seen as a 'gold standard' that manufacturers wish to have.

Question 15: Impact of HOTA on Road Safety Outcomes

The role of HOTA in enhancing road safety outcomes cannot be overstated. By ensuring the reliability of RTLEDs, HOTA contributes to enhanced road safety, and a reduction in traffic collisions and casualties, and supports the 'Vision Zero' initiative. It also increases enforcement and prosecution

capabilities – by saving the amount of time required to review incidences in court, facilitates behavioural change among road users, and improves public trust in enforcement devices.

However, the potential for improving road safety could be further realized by streamlining the HOTA process. Current delays in adopting innovative technologies and restrictions on the multi-purpose use of devices may limit their broader application in safety and enforcement contexts. Maintaining the link between type approval and court evidence acceptance is paramount for public trust and should not be diluted. The rigorous standards enforced by HOTA have a significant positive impact on road safety, contributing to the reduction of traffic collisions and enhancing public trust in enforcement devices. Yet, the process's inefficiencies, notably its slow pace, lack of dialogue between assessors and suppliers and restrictions on the multi-purpose use of devices, limit the potential for technological advancements that could further improve road safety outcomes.

Question 16: Current Experiences with the HOTA RTLED Process

ITS UK and PACTS have spoken to a number of manufacturers and a common view of the HOTA process is apparent:

- **The process is slow, with unknown timeframes for getting approval:** Many manufacturers have highlighted that securing type approval takes a long time, with some quoting around three to six years to get approval. Many have raised the issue that there is often little notice of how long their application will take to get approval.
- **The SpeedMeter Handbook:** Manufacturers have raised concerns around how up-to-date the SpeedMeter Handbook guidance is, of whether it is the best guidance for the sector. For example, the Speedmeter handbook specifies frequency spectrum and beam demands are adopted for only traditional narrow beam doppler radars that are practically not in use for enforcement anywhere but in the UK anymore. A wider spectrum allows for more precise measurements and a wider beam allows for the use of tracking radars that can trace vehicles inside the beam to not only enforce speed more accurately but also enforce, for example, hard shoulder, yellow box and illegal turns. This is just one example of where a change could have a beneficial impact on the sector.
- **Little dialogue with assessors:** Manufacturers understand the need for impartiality and a level of professional distance between those applying for type approval and those assessing applications. However, there is currently little to no dialogue between assessors and manufacturers, which means there is little understanding of what assessors are looking for or how manufacturers can improve their applications to ensure they have the best chance of succeeding.

Question 17: Experiences with HOTA Testing and Guidance

While detailed guidance and testing requirements are positive, ensuring high standards of device performance and reliability, challenges such as lengthy approval times and unclear communication inhibit innovation. The detailed guidance and testing requirements, while ensuring high standards, are seen as overly rigid and complex, deterring the development of new technologies.

Question 18: Suggestions for Improvement

To improve the HOTA process, PACTS and ITS UK suggest streamlining the approval process – particularly for minor modifications, increasing transparency, and adjusting requirements to encourage innovation. Speeding up the process and providing additional resources for testing facilities and administration are essential. A more open and collaborative approach, as demonstrated by the mobile evidential breath testing instruments competition, should be adopted for other technologies. Consideration of government funding for the rollout of newly approved technologies could mitigate budget constraints and prevent the creation of a two-tier system among enforcement authorities.

PACTS and ITS UK recommend several improvements to the HOTA process:

- Streamlining the approval process to reduce time to market for new technologies.
- Regular dialogue between DSTL and manufacturers.
- Establishing sensible timelines for approval and creating a fast-track process for minor modifications.
- Updating standards, particularly the SpeedMeter Handbook, to reflect current technologies and practices, focusing on the records produced rather than the operation of the equipment.
- Allowing devices to be used for multiple applications.
- Ensuring the process is outcome, rather than specification, focused. This would allow for greater innovation in technology and ensure the sector was able to keep up-to-date with emerging issues like cybersecurity.

In 2019, the Secretary of State for Transport granted the Parliamentary Advisory Council for Transport Safety (PACTS) funds to host a competition aimed at promoting the creation of mobile evidential breath testing devices (also known as roadside evidential breathalyzers) that comply with Home Office standards for approval. This more open and collaborative method of fostering innovation is something that should be maintained and applied to other areas, such as drug testing.

Often, even when new technology receives official approval, its deployment is hindered by financial limitations within police departments or safety camera partnerships. Permitting the use of new devices without ensuring their affordability can lead to a discrepancy in equipment usage across different forces, essentially creating a two-tier system. Therefore, whenever significant advancements in technology approval occur, like roadside evidential breath testing, the government should also consider allocating funds for the comprehensive deployment of such technology concurrent with its approval.

Accelerating the approval process would further prevent police forces from having to rely on outdated equipment by the time it receives approval.

Question 19: Additional Inputs for Consideration

We urge the Home Office to future-proof the HOTA process to better accommodate emerging technologies and to adopt a more flexible approach towards the multi-purpose use of enforcement devices. This flexibility would expand the potential applications of these devices, further enhancing road safety outcomes and delivering cost saving to the government organisations / Local Authorities that use them.