

## Response ID ANON-M9ZS-17A9-N

Submitted to Revising the Victims' Code  
Submitted on 2015-08-16 19:46:06

### Introduction

A What is your name?

Name:  
David G Davies

B What is your email address?

Email:  
david.davies@pacts.org.uk

C What is your organisation?

Organisation:  
PACTS - Parliamentary Advisory Council for Transport Safety (an All-Party Parliamentary Group)

### Questions on the proposals

1 Do you agree with our proposal to amend the definition of a victim entitled to services under the Code so that victims of any criminal offence become eligible rather than victims of crimes notifiable under the National Crime Recording Standards (NCRS)?

Yes

2 Please give your reasons to your response in question one.

Please give your reasons to your response in question one.:

PACTS' interests relate to transport safety, primarily road safety. We consider it anomalous and unjust that victims of offences such as careless driving and drink driving, which can have devastating consequences for victims, are currently not included.

3 Should any more organisations be added to paragraph 8 of the Introduction to the Code because they are competent authorities for the purposes of the Directive?

Yes

4 If yes, what organisations should be added?

If yes, what organisations should be added?:

We believe that there is a good case to include Coroners and Traffic Commissioners, both of whom have important roles in relation to investigating road deaths which may arise from driving offences now being added to the code.

The report of the Transport Safety Commission, supported by PACTS, has pointed to the need to strengthen investigation arrangements for road deaths and serious injury. (See UK Transport Safety - Who is responsible?  
[http://www.pacts.org.uk/wp-content/uploads/sites/2/TSCResponsibility\\_LowRes%20COMPLETE%20FINAL.pdf](http://www.pacts.org.uk/wp-content/uploads/sites/2/TSCResponsibility_LowRes%20COMPLETE%20FINAL.pdf))

5 Should any of the organisations listed in paragraph 8 of the introduction to the code be removed because they are not competent authorities for the purposes of the Directive?

6 If yes, what organisations should be removed?

If yes, what organisations should be removed? :

Not as far as we are aware but we have not answered this question.

7 To comply with the Directive, have we imposed the right duties on the additional service providers in chapter 5 of the Code?

Yes

8 If not, what should we add or amend?

If not, what should we add or amend?:

These duties seem correct.

In addition, service providers should be required to publish summary information on the scale of demand, services provided, performance levels etc.

9 Do you have any comments on any of the other amendments we propose to make to the Code?

Do you have any comments on any of the other amendments we propose to make to the Code?:

No

10 Do we need to make any other amendments to the Code to implement the Directive?

No

11 If yes, what amendments need to be made?

If yes, what amendments need to be made?:

### Questions on the Equalities Statement

12 Do you think we have correctly identified the effects of these proposals on those with protected characteristics under the Equality Act 2010?

13 If not, are you aware of any evidence that we have not considered as part of our equality analysis? Please supply the evidence. What is the effect of this evidence on our proposals?

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There does not appear to be sufficient evidence available to answer this.

### Questions on the Impact Assessment

14 Do you think we have adequately assessed the impacts of our proposals in the impact assessment?

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