



11/1/11

Re: THSG reply to stakeholder comments on NICE's Draft Guidance on: Strategies to prevent unintentional injuries among children and young people aged under 15.

In response to one of our comments there is the following statement:
"The PDG do not consider that the promotion of cycle helmets constitutes convincing children and their parents that cycling is relatively dangerous."

That may well be the opinion of the PDG, but we doubt it would be shared by many sensible people. We approve of this statement being made public.

There is also a response which suggests that our original comment was not understood. We criticised the content of Expert Testimony #5 (cycle helmets), on the basis that it contained a selective summary of a recent DfT report (PPR 446) on cycle helmets. We pointed out that the extract presented in Expert Testimony #5 was not a valid scientific result. Rather, the authors of PPR446 had simply made assumptions, in the absence of evidence, and the results were then presented as hard scientific conclusions in the PPR446 summary. The authors of PPR446 are quite explicit, in the body of the report, about the void basis of their exercise, which was in effect just a speculation (see pp35-37 or PPR446).

The response to our original comment is: "PPR446 states that "a specialist biomechanical assessment of over 100 police forensic cyclist fatality reports predicted that between 10% and 16% could have been prevented if they had worn an appropriate cycle helmet". This statement was accepted and repeated in good faith."

We would have expected that a document defining itself as "Expert Testimony" would have been written by people who had actually studied the report in question, rather than just lifted one of its conclusions at face value. Had they indeed read the report, they would have had to acknowledge that the apparently impressive result cited was based on no more than private opinion, not valid science. It constitutes a politically useful headline that shields the true scientific

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conclusion of PPR446:

"As a result, it was not possible to quantify the amount of benefit offered by modern cycle helmets in the UK from the literature review alone."

In other words, the PPR446 authors had to concede the politically unpalatable fact that the medical evidence does not support government policy. But this is buried away on the third page of the summary (attached). Are we to take it that the authors of Expert testimony #5 did not read that far?

The reason that this point is being laboured is that Expert Testimony #5 is still presented on the NICE web site. Hence it can only be assumed that our original criticism was not understood. Otherwise, it must be assumed that personal opinion presented as proven science is regarded by some as "clinical excellence". We doubt that this view is widely shared in the academic community. We strongly recommend that Expert Testimony #5 be withdrawn from public view..

Yours sincerely

Dr Jenny Mindell