Department for Transport
Roads Policing Review: Call for Evidence

Response from AXA UK

1. AXA UK (AXA) is part of the AXA Group, a worldwide leader in financial services, operating in 57 countries with over 160,000 employees and 108 million customers. AXA has around eight million customers in the UK and operates through specific operating companies – AXA Insurance and AXA PPP healthcare.

Executive Summary

2. AXA UK is one of the leading UK motor insurers and therefore we offer insight into road safety, from the claims that we process and our work more broadly. AXA is committed to raising awareness of road safety and supporting initiatives to ultimately reduce road traffic accidents in the UK.

3. AXA is acutely aware that the steady decline in road deaths and serious injuries on UK roads has plateaued since 2010. The Government should be concerned about the year-on-year trends and bolster the UK's road safety strategy with strong action by increasing traffic law enforcement, reviewing the education provided for novice drivers, supporting engineering works to improve roads identified as particularly risky and continuing to facilitate the development of safer technology.

Response

4. AXA understands that around 1,800 people die on UK roads each year and a further 25,000+ people are seriously injured. Since 2010, the long-term trend of year-on-year declines in roads deaths and serious injuries has stopped. There are several factors that could explain the plateau of road casualties including compliance with traffic and road safety laws, inadequate levels of roads policing and enforcement strategies and decentralised leadership on road safety strategy and long-term national targets. It is a combination of these factors that will provide a narrative that explains the current plateau in road casualties. Measures in these areas would support government in meeting its objectives on improving road safety.

Compliance with Traffic and Road Safety Laws and Enforcement Measures

5. AXA would consider enforcement measures to have a significant impact on improving road safety across the UK. As outlined by the Parliamentary Advisory Council for Transport Safety (PACTS) in their June 2020 report, many of the casualties on UK roads are as a result of a failure to comply with traffic laws – knowingly or otherwise. Around two-thirds of collisions relate to the "fatal four" offences including excessive speed, using a phone whilst at the wheel, a driver over the legal alcohol limit, failure to wear a seat belt or a combination of these factors.

6. Over the past decade, AXA understands that the number of roads policing officers has decreased substantially. While the total number of police officers has fallen by around 13 per cent since 2010, there was a 22 per cent reduction in the number of dedicated roads policing

officers between 2010 and 2014, and a further reduction of 18 per cent since 2015. In addition, dedicated roads policing officers only make up around 4% of total force strength and are often considered "double-hatted" with responsibilities beyond what would be considered typical for a roads policing officer.

7. Given the reduction in specialist roads policing officers, it is not surprising that the number of motoring offences detected has also reduced. The only area of motor offences enforcement that has not seen a decline in detection rates is the area of automated enforcement i.e. speeding offences. Numerous studies (including Elliot and Broughton 2005 and Smith et al., 2015) have highlighted that there is a relationship between roads policing and road safety; increasing enforcement levels will result in reductions in road offences and collisions. It is difficult in practice, to determine the precise nature of the relationship, primarily because of inconsistencies in the information available on current enforcement levels. Nonetheless, academic studies do suggest that the impact of greater enforcement, including roads policing, would impact positively on collision numbers.

8. AXA believes it is essential for government to reduce the downward trend in the number of specialist roads policing officers in the UK Police Force. As part of the Government's pledge to fund 20,000 new police officer posts by 2022, the Government should support a significant expansion in the number of dedicated roads policing officers across the UK, ensuring they are fully resourced to undertake traditional traffic law enforcement.

9. One measure that would signal a stronger commitment to roads policing in the UK would be considering a recommendation outlined in the PACTS report referred to above. AXA considers it appropriate for roads policing to be included in the Strategic Policing Requirement set by the Home Secretary to ensure there is appropriate collaboration across police forces and agencies.

10. AXA believes the continued use of technology to improve enforcement by complementing the work of specialist officers is also a necessary component of roads policing. Research (e.g. Allsop 2010) shows that technology such as speed and red-light law enforcement cameras are positive measures to improve compliance and reduce collisions. However, there is currently inconsistent application of enforcement measures across the UK roads network. AXA would be supportive of a review into extending technological enforcement on UK roads and the scope of such a review should include the potential for technologies, including Automated Number Plate Recognition (ANPR) systems, to facilitate greater intelligence-led policing.

11. AXA believes that greater collection and sharing of data on road traffic accidents and enforcement levels of driving offences would be beneficial in helping to identify links between user behaviour, enforcement levels and overall road safety in the UK. For example, AXA considers police STATS19 data to be flawed in its inability to incorporate low severity road traffic accidents. The gaps and inconsistencies in the data may prevent a complete understanding of where the Government's approach to road safety could be improved and ultimately, improve evidence-led policy making.

Road Safety Strategy

12. AXA considers leadership on road safety to have become increasingly decentralised over the last decade. Although Highways England has been empowered to construct and implement their own strategy and to set their own safety goals, increased decentralisation has resulted in a lack of a holistic strategic framework from central government. The issue of decentralisation was highlighted by SYSTRA in their Road Safety Management Capacity Review, which sighted a lack of an agreed National Safety Performance Framework and no explicit long-term targets guiding central government activity. The overall finding of the Review was that the absence of a safety performance framework for the interim and in the long-term is resulting in poor cohesion in coordinating efforts and fragmented activity. While the Government has released an updated Road Safety Statement, increased focus led by central Government is necessary looking forward.

Education

13. As a motor insurer, the accident data we collect illustrates that recently qualified drivers are a group of drivers at high-risk of an accident. This data is corroborated by other sources including a study by ALA GAP Insurance Brokers who found that 21.6% of new drivers had been involved in an accident during their first year of driving. As outlined by the road safety charity Brake, young drivers have increased tendencies to be overconfident in their ability to drive safely, underestimate risks associated with risky behaviour such as speeding and are poor assessors of hazards due to their inexperience on the roads. From Government's own research we know that young drivers travel only half the distance of drivers aged 25 and over, yet are overrepresented in accident figures.

14. In addition, there is currently a low pass rate for the tests required to become a qualified driver. The pass rate for the practical test is around 46% and for the theory test there is a pass rate of around 47%. These statistics are additionally concerning considering the pass mark required in hazard perception is only 44 out of 75 (58.67%). Given the current pass rates, it may be appropriate to look at the methods and overall quality of instruction and assessment in the UK.

15. AXA considers the requirements around driving instruction to be currently unsatisfactory. It is currently not mandatory for learners to have instruction from an Approved Driving Instructors (ADIs). Many learners, therefore, may choose non-qualified instructors or Potential Driving Instructors (PDI) who are in the process of attempting to get their instructor qualification. This results in the standard of instruction being inconsistent across learner drivers. AXA would welcome an approach from the Government that mandates that only qualified ADI's can provide education for learner drivers.

16. In addition, there is no mandatory requirement for newly qualified drivers to receive additional training once qualified to drive and so drivers miss out on valuable further education that could increase their ability to drive safely on UK roads. In our experience, most drivers are unlikely to pay for any additional training if it is voluntary, for example

Government research found that only 3% of new drivers have taken their voluntary Pass Plus. AXA would welcome an approach from the Government that result in new driver's driving skills being built up in a more structured and gradual way. There has been a wealth of evidence to suggest the introduction of Graduated Driver Licensing (GDL) as a public policy intervention would have strong road safety benefits. A GDL approach would structure driving instruction over a longer period of time and would take into consideration a holistic range of driving skills including driving in the dark, awareness of speed and driving in adverse conditions. An example of this evidence comes from New Zealand where the introduction of GDL reduced road traffic accidents among 15-19 age group by 23% and among 20-24 age group by 12%.

Engineering works to ensure consistency across the network

17. Road safety is currently inconsistent across the UK road network, indicating there are areas where more progress is needed. The risk on our roads is largely concentrated on particular sections of the network and AXA understands that targeted action on the most dangerous roads delivers the most benefits.

18. While the Government's Safer Roads Fund initiative that delivered engineering improvement across the top-50 high-risk A-road sections in England (2016-18) was a welcome example of coherent collaboration across the roads network on safety, road safety remains inconsistent across the network with risks concentrated on particular sections of UK roads. AXA would encourage the Government to continue to fund similar measures that identify and address high-risk roads.

19. Around 85% of casualties occur on local roads. Whereas the Government has empowered Highways England to work on the Strategic Road Network, similar empowerment needs to follow for local authorities with greater engagement and funding on local roads. AXA welcomes the Government's intention to review the Safer Roads Fund to understand effectiveness of knowledge-sharing amongst local authorities.

Design & Technology of Vehicles

Telematics

20. The use of telematics has had a degree of success in extending the 'reward based' insurance approach, incentivising better driving habits. When used correctly, telematics provides insights into driver behaviour which isn't available elsewhere. As outlined above the current approach to driving instruction in the UK does not encourage continued driver development in the initial years as a qualified driver, telematics can therefore be a source of useful information for those drivers to support their continued development as a safe driver. However, telematics systems are not a panacea for safer roads and should be utilised as one element of overall road risk management. AXA considers the core issues around roads policing and reducing the fatal four offences to be the area in which the greatest gains can be made in the short to medium term on road safety.

Future of Mobility

21. AXA believes Government should continue to encourage technological improvements in cars to be adopted across the UK e.g. Autonomous Emergency Braking and should continue to fund for the trialling and development of Connected and Autonomous Vehicles (CAVs).

22. CAV technology has the potential to remove the cause of **90% of road traffic accidents** – driver error. CAVs are predicted to save over 2,500 lives and prevent over 25,000 serious collisions in the UK by 2030. The Automated and Electric Vehicles Act laid the foundations for CAVs by ensuring a smooth transition for consumers with the creation of a single insurance model, but work is required to ensure the UK remains an autonomy leader and can harness the potential benefits of safer roads. In order to progress the development of CAVs, AXA would urge Government to consider the following areas:

    - **Continued Funding** – The UK is recognised as a global leader in CAVs, largely due to the £400 million invested by Government and industry in recent years. Any slowing of investment now will result in the UK importing this technology as a tech taker rather than a tech maker.
    - **Legal & Regulatory Framework** – Must clearly define, with little room for interpretation the responsibilities of the users of CAVs and any changes to the current road safety regime.
    - **Data** – Access to data is fundamental for establishing liability and accurate risk modelling. The type of data being collected, and its uses, should be transparent, so Government and industry should collaborate to create a 'data map' for the CAV ecosystem to identify frameworks for effective governance and who needs to access data, what type and when.
    - **Consumer Education** – Government, road safety agencies and the relevant industry stakeholders must provide sufficient levels of information to educate consumers on the limitations of the new technology and their responsibilities as a user. This includes the need for industry to ensure the public is aware that SAE level 3 vehicles are not autonomous and so users cannot disengage at any point during a journey.

23. In addition, AXA understands the importance of encouraging transport innovations that could enable UK roads to be greener, cleaner and more inclusive. Micromobility vehicles is an area the Government is rightly focusing on and in alignment with the activity that is occurring in other countries. While AXA is keen to support new technology in the transport sector, the Government should ensure a regulatory framework is in place that prioritises road safety.

24. As one of the largest UK motor insurers, our customers will be affected by the move towards micromobility on roads. AXA recently contributed a response to the Department for Transport's call for evidence on the 'Future of Transport Regulatory Review, where we highlighted that if there was no insurance framework for e-scooters and micromobility vehicles were to fall under the definition of "vehicle" as per the current Motor Insurance Directive and the Road Traffic Act 1988, collisions involving micromobility vehicles and the

resulting claims would be under the responsibility of the Motor Insurers' Bureau (MIB) in alignment with the Uninsured and/or Untraced Drivers' Agreement. In this scenario motorists, whose insurance premiums fund the MIB, would be obliged to cover accidents not caused by motor vehicles and whose users have not contributed to the MIB.

25. AXA believes the regulatory framework for micromobility vehicles, including e-scooters, must be considered as a holistic package including construction requirements, user requirements, appropriate insurance provision and the mandating of the operational domain where these vehicles can be used. The regulatory framework should not apply unnecessary burdens on users or commercial stakeholders but must place priority on the safety of all road users. AXA proposed framework is as follows:

- **User safety measures**: The available evidence on e-scooters, suggests the most significant risk of serious or fatal injuries is to the user of the device:
  - AXA would urge the Department for Transport to mandate the compulsory wearing of helmets, particularly in the early years of this new technology
  - AXA would encourage users to undertake basic training to fully understand their responsibilities and how to use their devices safely
- **Construction requirements**: AXA believes adoption of construction requirements similar to those used in Germany (who already have an evidenced regulatory framework) can better facilitate the usage of e-scooters on lower speed roads and on cycle lanes and tracks – these include a fixed handlebar, maximum design speed of 15.5mph and power limitation
- **Insurance:** AXA considers it fundamental there is a form of insurance for e-scooters, however, it would seem disproportionate to instate an insurance regime for micromobility vehicles as if they were conventional vehicles. To strike an appropriate balance, the Government should amend the definition of "vehicle", so it does not apply to e-scooters, and subject e-scooters to compulsory liability insurance with capped indemnity limits
- **Registration:** The registration of micromobility vehicles would enable enforcement of use and construction requirements. Vehicle registration would not necessarily need to follow the same approach for conventional motor vehicles which could be unnecessarily burdensome.

If you need to get in touch regarding the information in this submission, please get in touch with AXA UK Public Affairs at ukpublicaffairs@axa-uk.co.uk