

Written evidence submitted by AXA UK (SDV0010)

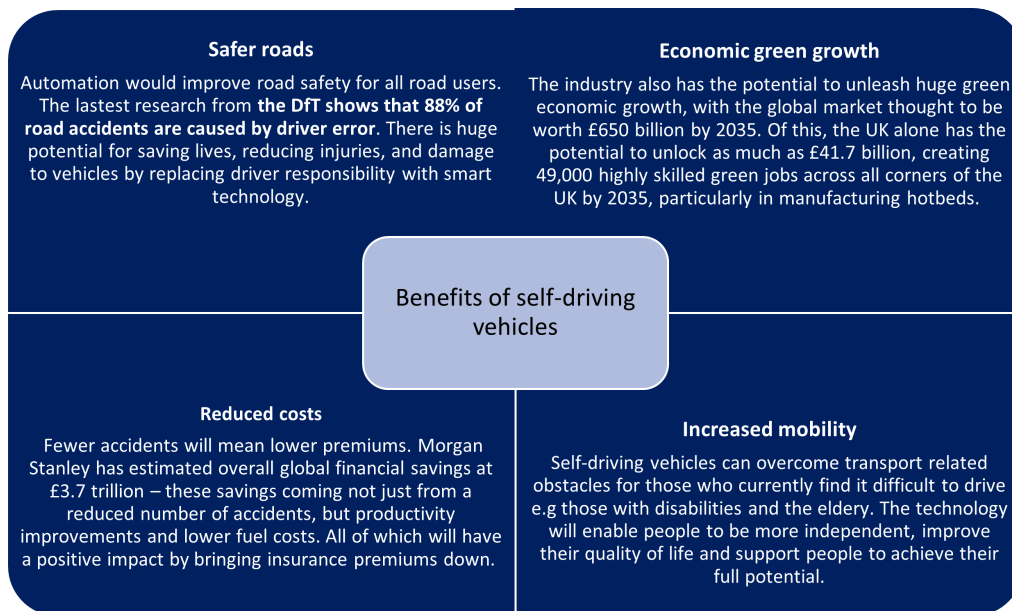
About AXA UK

1. AXA UK is part of the AXA Group, a worldwide leader in financial services, operating in 54 countries with over 153,000 employees and 104 million customers. In the UK, AXA operates through specific companies – AXA Insurance and AXA Health – and has over 8 million customers and 9,000 employees, with over 90% employees based outside London.
2. As a leading insurer, AXA is committed to finding and developing ways to make our roads safer, more efficient and improve mobility for those currently unable to drive. AXA firmly believes automated driving technologies can deliver significant benefits for the UK road network and economy provided safety remains at the heart of their development and deployment.
3. AXA has been involved in the automated vehicles space since 2014, partnering with the Government on five projects, focusing on different aspects of testing and development. Our role in these projects included providing advice on safety, regulation, liability and data. As a partner, AXA has published several reports on various aspects of self-driving, including several Insurance & Legal Reports for the FLOURISH Consortium, focused on [Cyber Security, Data and Connectivity](#) and the VENTURER Consortium focused on [liability frameworks](#) and the [handover](#) between vehicle and driver.
4. AXA has consistently worked to support the Government in progressing legislation and actions that enable the UK to progress further towards the deployment of automated vehicles safely, including through AXA's previous role as Chair of the Autonomous Driving Group at the Association of British Insurers (ABI). We also provided evidence to the Public Bill Committee on the Automated and Electric Vehicles Act 2018, a crucial world-leading piece

of legislation supporting the roll-out of automated vehicles on UK roads. We also established the Connected and Automated Mobility APPG.

5. Our experience has enabled us to recognise the positive societal and economic impact the technology could have on society and some requirements that must be included in the upcoming Transport Bill to ensure safety remains at the heart of the deployment of this technology.

Potential benefits of self-driving vehicles/technologies



6. Overall, self-driving technology has the potential to pave the way for safer roads, increase mobility and create highly skilled green jobs across the whole of the UK. The technology has the potential to unleash growth in former industrial heartlands (Sunderland, Coventry and Swansea), creating new technology and innovation hubs across the country.
7. The UK also has a unique post Brexit opportunity to be a global leader in the development of this technology and capitalise on the benefits. The investment to date by Government, and the work of CCAV has resulted in the UK being a key player in this industry.

8. On the international stage, the US, EU and particularly France and Germany are also progressing this technology rapidly, with cross-border trials taking place in the EU. And in Phoenix these vehicles are already operating as a self-driving taxi service, similar to Uber but without the driver. However, the UK has a real opportunity to capture the market for the development of this technology creating around 50,000 – 75,000 green jobs.
9. If the right investment and regulatory conditions are established with safety remaining at the heart of development, the UK could unlock a new era of possibilities for British businesses, levelling up every corner of the UK, improving productivity creating highly skilled jobs and reducing emissions.

The future of mobility

10. As the trials have progressed, AXA has gained an insight as to how this technology could operate in the future. The technology has the potential to create a huge transport revolution and the biggest overhaul since the invention of the modern-day car. The way people move around and interact with their communities, as well as the distribution of goods and freight could radically change, bringing greater mobility in a cleaner, greener and safer way. As a result, mobility could look radically different in the future. Some examples include:
 - The every-day car model could become a subscription service whereby people car share using subscription services
 - Councils have expressed interest in reconnecting old railway lines with these auto-shuttle pods, creating more communities. Parts of HS2 have been cited as an example.
 - Similarly, councils have expressed an interest in connecting communities to critical areas that are often on the outskirts of areas including universities, colleges and hospitals.
11. However, the future of this, is critically dependent upon digital infrastructure. 'Secure connected networks' must be established to enable this technology to work safely and securely. We recommend that a

minimum set of standards for digital infrastructure and connectivity should be developed to mitigate any potential connectivity challenges.

Legislation requirements

12. Overall, AXA UK welcomes the findings of the Law Commissions' three-year consultation. However, to ensure safety remains at the heart of the legislation, AXA firmly believes the following must be included in the upcoming Transport Bill:

- **Definition** – A clear legally binding definition must be established **distinguishing self-driving technology from assisted driving technologies**. There is concern amongst the industry that without this distinction, public confusion could be created around the differing responsibilities of technology and the user.
- **Liability, accountability, and responsibility** – In line with the Law Commission's recommendations clear lines of liability, accountability and responsibility must be established. As part of this, the Government should also consider providing a statutory liability process for vehicles that can function under UIC (User in charge) and NUIC (No user in charge) features. Without clear lines of liability, insurers will be unable to determine fault in the event of an accident and people will not be provided with confidence to understand their own responsibilities.
- **Data** – The Government must ensure that data is stored and accessed in an appropriate way. Provisions that ensure insurers have access to specific data in the event of an incident are fundamental for establishing liability, effective claims management and enabling insurers to meet their obligations under the Automated and Electric Vehicles Act 2018.
 - **Required data:** ADAS (Advanced Driving Assistance Systems) activation data, geolocation data, speed data, records of human intervention). Insurers may also require more detailed vehicle data for investigation purposes.
- **Wrongful interference** – Stringent consequences must be set out in the legislation for wrongful interference or malicious damage to self-driving technology. This interference could range from

computer hacking, spraying sensors or standing in-front of such vehicles. These consequences are required to provide the public with confidence and ensure the technology does not become a target for crime.

- **Safety cases** - The regulator should be required to provide best practice guidance to manufacturers and developers for safety cases. This guidance be led by guidance from the authorisation process. Measures, including clear rules, and training, would support the improved quality of safety cases for and ensure a more efficient audit for regulators.

Beyond the legislation

13.To support the rollout of this technology the Government must also consider the below. The UK will not be able to capitalise on the opportunities/benefits of self-driving technology without a public information campaign, marketing guidance or requirements for information at point of sale.

- **Public information campaign** - The development of self-driving systems must be accompanied by a public communications programme supported by the Department for Transport, insurers, manufacturers and road authorities to help provide appropriate, accessible, and consistent information to inform and educate consumers.
- **Marketing guidance** – Manufactures and software developers must be provided with best practice guidelines for communication and marketing materials. Without such guidance, confusion could be created amongst consumers around the limitations of the technology and how to interact with the technology safely.
- **Point of sale contact** - As part of the sale or lease of self-driving vehicles an induction to explain the technology must be provided to the user. As this technology will be revolutionary, the Government should consider how to safely ensure that users are provided with the correct and practical information.

14. Finally, AXA, if helpful, can provide further insights from our experience to support the committee with their inquire either formally or informally. We would also be happy to work with our partners to facilitate a visit for the committee to see some of this technology in action.

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