

Written evidence submitted by Keoughs LLP (RSS0059)

1. INTRODUCTION

Keoghs is the only top 100 UK law firm to focus exclusively on defending both mainstream and specialist insurance claims. We provide an end-to-end claims service to insurers, public sector bodies, and self-insured corporates, including pre-litigation, litigation, and costs negotiation. We act for eight of the top ten UK general insurers and have almost 1,800 staff.

This response is submitted from the perspective of a law firm working closely with UK motor insurers. Our work gives us a direct view of the causes and consequences of road traffic collisions in Great Britain. Through claims defence, casualty litigation and regulatory engagement, we observe first-hand the financial, societal and human impact of road traffic collisions and serious injuries.

Motor insurers and large fleet operators share a strong interest in improving road safety outcomes. Deaths and serious injuries on the road represent not only a profound human tragedy but also substantial societal costs. Those costs ultimately fall on the public through insurance premiums, the Motor Insurers' Bureau (MIB) levy, public healthcare expenditure, and productivity losses.

For these reasons, we welcome the Government's renewed focus on road safety and the ambition expressed within the Road Safety Strategy. We broadly support many of the measures proposed. However, we believe the strategy would be significantly strengthened by several additional reforms, most notably the introduction of a Graduated Driving Licence (GDL) system.

2. Ambitions and Evidence

(a) Do the targets reflect the right level of ambition?

The strategy sets targets of:

- A 65% reduction in people killed or seriously injured (KSI) by 2035, and
- A 70% reduction in child KSIs by 2035.

These targets represent an appropriate level of ambition and are consistent with international efforts to reduce road fatalities under the Safe System approach.

However, achieving these targets will require structural reform rather than incremental changes alone. The UK has experienced periods of stagnation in

casualty reduction over the past decade. Without significant policy interventions addressing known high-risk driver groups and systemic enforcement gaps, the scale of reduction proposed is unlikely to be achieved.

The strategy must therefore ensure that the most significant drivers of risk are addressed directly.

(b) Governance, delivery and resourcing arrangements

Road safety outcomes depend on coordinated action across multiple departments and agencies, including:

- Department for Transport
- Home Office
- Ministry of Justice
- Police forces
- Local authorities
- Highway authorities
- Vehicle manufacturers
- Employers operating vehicle fleets

Effective governance requires a clearly defined accountability structure and sustainable funding. Historically, road safety delivery has been fragmented between national policy and local implementation, particularly in relation to enforcement and infrastructure.

We would support stronger oversight arrangements, potentially including:

- A national road safety performance framework with annual reporting to Parliament
- Clear departmental accountability for delivery of casualty reduction targets
- Dedicated funding streams for enforcement and road infrastructure improvements

Without adequate resourcing for policing and enforcement, many proposed measures will have limited practical effect.

(c) Are the measures sufficient to deliver the targets?

The strategy contains a number of positive proposals, including:

- A potential minimum learning period for learner drivers
- Lower drink-drive limits, particularly for new drivers
- Increased penalties for failing to wear seat belts
- Mandatory sight tests for drivers aged over 70
- Mandating vehicle safety technology such as Advanced Driver Assistance Systems (ADAS)
- Measures to address 'ghost' number plates
- A work-related road safety charter

These measures are welcome and should contribute to improved safety outcomes.

However, one of the most significant omissions from the strategy is the absence of a **Graduated Driving Licence (GDL)** for newly qualified drivers.

This reform has been supported by the insurance industry and road safety groups for many years and has demonstrated strong results internationally.

(d) Are the measures based on robust evidence?

Many of the measures proposed are well supported by existing evidence.

For example:

Seatbelt use is one of the most effective safety interventions in modern road transport. Extensive research demonstrates that wearing a seatbelt dramatically reduces the risk of fatal or life-changing injuries in collisions. Increasing penalties for failing to wear seatbelts is therefore likely to improve compliance and reduce casualty severity.

Similarly, lowering drink-drive limits is supported by international evidence showing that lower thresholds are associated with reduced alcohol-related collisions.

However, the strategy could benefit from greater transparency around the modelling underpinning its casualty reduction projections. For each intervention, the Government should clearly set out:

- Expected casualty reductions
- Estimated behavioural changes
- Implementation costs
- Enforcement requirements

Such transparency would allow Parliament and stakeholders to assess whether the measures collectively are capable of delivering the proposed targets.

(e) International lessons

The Government's reference to Sweden's Safe System approach is welcome. Sweden's 'Vision Zero' framework recognises that road systems must be designed to accommodate human error without resulting in fatal outcomes.

Key elements of this approach include:

- Safer road design
- Safer vehicles
- Lower speeds where vulnerable road users are present
- Shared responsibility between road users and system designers

Another important international lesson relates to the use of graduated driver licensing (GDL) systems.

Countries including Canada, Australia, and New Zealand have introduced structured licensing systems that place temporary restrictions on newly qualified drivers. These restrictions typically address the most common risk factors for serious collisions involving young drivers.

Evidence from these jurisdictions shows substantial reductions in fatal collisions following the introduction of GDL systems.

3. Theme 1 – Supporting Road Users

(f) Measures for new and novice drivers

Young drivers represent one of the highest-risk groups on the road.

Statistics show that **24% of fatal or serious injury collisions in Britain involve drivers aged between 17 and 24.**

The risk posed by young drivers extends beyond those within the vehicle. In 2024 alone, nearly **5,000 people were killed or seriously injured in collisions**

involving at least one young driver, including pedestrians, cyclists, and occupants of other vehicles.

Common risk factors include:

- Carrying peer passengers
- Driving late at night
- Speeding
- Unsafe overtaking

Overconfidence combined with limited driving experience

A **Graduated Driving Licence (GDL)** directly targets these risks by introducing phased driving privileges following the driving test.

Typical GDL features include:

- Restrictions on the number of peer passengers
- Night-time driving restrictions
- Lower alcohol limits
- Stricter penalty thresholds for offences

International evidence demonstrates the effectiveness of this approach.

In Canada, the introduction of graduated licensing across provinces contributed to an **83% reduction in deaths among drivers aged 16–19**.

In New South Wales, strengthening GDL restrictions resulted in a **55% reduction in fatal crashes among probationary drivers**.

Northern Ireland has recently announced plans to introduce a graduated licensing framework.

Given the strength of the evidence base, we recommend that the Government reconsider its decision not to pursue GDL in Great Britain.

Importantly, a well-designed system can avoid restricting employment opportunities for young drivers by providing exemptions for work-related driving.

We support the Government's proposal to introduce a minimum learning period for learner drivers. However, we believe the period should be set at a **minimum of 12 months**.

A 12-month learning period would ensure that learner drivers gain experience across a wide range of road conditions, traffic environments and seasonal variations. Driving risk is strongly associated with inexperience, and research consistently shows that the first year of independent driving carries the highest collision risk. A longer supervised learning period provides opportunities for novice drivers to build practical driving experience gradually and safely before being exposed to the full range of driving risks.

Shorter learning periods risk incentivising learners to progress through the system quickly without gaining sufficient practical experience. In particular, very short learning windows can encourage the use of **intensive driving courses**, in which learners undertake concentrated blocks of instruction over a short period of time before immediately sitting the practical test.

While these courses may allow individuals to pass the driving test quickly, they do not replicate the breadth of real-world driving experience required to develop safe driving habits. They can therefore undermine the objective of ensuring that newly qualified drivers have accumulated sufficient practical experience before driving independently.

For that reason, we support the introduction of a **minimum 12-month learner period combined with an end to intensive driving courses as a pathway to test readiness**. Ensuring that learner drivers accumulate experience gradually over time would help improve driver competence and reduce the elevated collision risk associated with newly qualified drivers.

A longer learning period would also complement wider road safety measures aimed at novice drivers, including the potential introduction of a **Graduated Driving Licence (GDL)** framework.

(g) Safe driving later in life

The proposal for **mandatory sight testing for drivers over 70** is proportionate and sensible.

Vision deterioration is a well-established risk factor in driving collisions. However, any framework must balance safety with the independence and mobility needs of older drivers.

A targeted medical assessment framework, rather than purely age-based restrictions, would be preferable.

(h) Work-related road safety charter

We welcome the Government's proposal to pilot a **work-related road safety charter**. Driving for work accounts for a substantial proportion of road mileage in Great Britain and employers therefore have an important role to play in reducing road risk.

Through our work acting for insurers and large corporate organisations, including national retailers operating significant vehicle fleets, we see first-hand the safety frameworks already in place within many well-run fleets. Larger fleet operators frequently operate comprehensive road risk management systems that include:

- Structured driver risk assessments and training programmes
- Telematics and driver behaviour monitoring
- Strict policies on mobile phone use while driving
- Fatigue management procedures
- Vehicle maintenance and inspection regimes
- Incident reporting and investigation processes
- Senior management accountability for fleet safety

These measures have often been developed over many years in response to claims data, regulatory expectations, and operational experience. In many cases they have demonstrably reduced collision frequency and severity.

For that reason, the development of the charter should seek to **learn from and incorporate best practice already operating within established fleet safety frameworks**. Businesses with substantial driving exposure should therefore be placed at the centre of the charter's design and evaluation. Engagement with employers, insurers and fleet safety specialists will help ensure that the charter reflects practical, evidence-based interventions rather than duplicating or conflicting with existing effective practices.

The proposal to **pilot the charter over a two-year period** is sensible. However, the pilot should include:

- **regular review points during the pilot period**, allowing early lessons to be identified and incorporated;

- clear metrics for measuring effectiveness, such as reductions in collision frequency, claims severity and near-miss incidents; and
- structured consultation with participating organisations throughout the pilot phase.

It will also be important that any requirements emerging from the charter are **proportionate and scalable**, recognising the differences between large national fleets and smaller businesses.

Ultimately, the success of the charter will depend on ensuring that any measures adopted are **supported by evidence demonstrating that they reduce incidents and improve driver safety outcomes**. A collaborative approach between Government, employers, insurers and road safety bodies will maximise the likelihood that the charter produces meaningful improvements in work-related road safety.

(i) Fear of traffic danger and active travel

Fear of traffic danger is a significant barrier to walking and cycling.

Infrastructure improvements that separate vulnerable road users from vehicle traffic are among the most effective interventions for increasing safety and encouraging active travel.

Examples include:

- Segregated cycle lanes
- Traffic-calmed residential areas
- Protected junction designs

(j) Motorcycle training and licensing

Motorcyclists remain disproportionately represented in serious road casualties.

Reform should focus on improving rider training, hazard perception awareness and progressive licensing pathways that ensure riders gain experience before accessing higher-powered motorcycles.

4. Theme 2 – Technology, Data and Innovation

(k) Maximising the benefits of ADAS

Advanced Driver Assistance Systems (ADAS) have the potential to significantly reduce collision rates.

Examples include:

- Automatic emergency braking
- Lane-keeping assistance
- Intelligent speed assistance
- Driver fatigue detection systems

However, their effectiveness depends on correct usage. Drivers must understand both the capabilities and limitations of these systems.

Government should therefore ensure:

- Mandatory inclusion of key ADAS features in new vehicles
- Public education campaigns on correct system usage
- Data sharing between insurers and manufacturers to analyse safety outcomes

(I) Strengthening vehicle safety standards

Several emerging issues require regulatory attention.

These include:

- Headlamp glare from modern LED systems
- Increasing vehicle size and weight, particularly SUVs
- Ensuring ADAS systems are correctly recalibrated following vehicle repairs

Failure to recalibrate ADAS systems after repairs is an emerging safety risk which may compromise collision avoidance features.

Ghost Number Plates

‘Ghost’ or ‘stealth’ number plates are modified vehicle registration plates designed to evade Automatic Number Plate Recognition (ANPR) cameras.

These plates use reflective coatings or films that disrupt infrared light used by police and traffic enforcement systems.

While appearing normal to the human eye, they can become unreadable to ANPR cameras.

Research suggests that **as many as one in 15 vehicles may be using modified or non-compliant number plates.**

The consequences are significant:

- Drivers evade traffic enforcement
- Vehicles involved in crime become harder to trace
- Toll and parking charges are avoided
- Enforcement of uninsured driving becomes more difficult

The issue also has financial implications for compliant motorists. Costs arising from uninsured or untraceable drivers are ultimately borne by the Motor Insurers' Bureau and funded through a levy on insurers, which is passed on to policyholders through insurance premiums.

There are currently **over 34,000 registered number plate suppliers in the UK**, and enforcement of compliance among sellers appears limited.

Current penalties – typically a £100 fine – are unlikely to provide a sufficient deterrent.

We support proposals to introduce:

- £1,000 fines
- Six penalty points
- Stronger regulation of plate suppliers
- Enforcement operations targeting illegal plates

5. Theme 3 – Ensuring Infrastructure is Safe

(m) Speed limits and safety

There is strong evidence linking vehicle speed with both collision likelihood and collision severity.

National guidance should reflect this evidence while allowing local authorities flexibility to implement appropriate limits based on local conditions.

(n) Rural road safety

Rural roads account for a disproportionate share of fatal collisions.

Effective interventions include:

- Median barriers
- Average speed enforcement

- Improved road markings and signage
- High-friction road surfaces

Investment in these measures can significantly reduce fatalities.

(o) Road design and maintenance

Road maintenance plays an important role in preventing collisions. Poor surface conditions, potholes and inadequate drainage can contribute to loss-of-control incidents.

Investment in preventative maintenance can reduce both casualty rates and insurance claims.

6. Theme 4 – Enforcement

(p) Compliance and deterrence

Offences most strongly associated with serious collisions include:

- Speeding
- Drink and drug driving
- Mobile phone use while driving
- Failure to wear seat belts

Enforcement should focus on these behaviours.

Automated enforcement technologies, including speed cameras and mobile phone detection cameras, can play a significant role in improving compliance.

(q) Sanctions and driver behaviour

Deterrence depends on three factors:

- The likelihood of detection
- The speed with which penalties are imposed
- The severity of sanctions

Evidence suggests that the certainty of detection is often more important than the severity of penalties alone.

7. Insurance Market Perspective

Reducing collisions and serious injuries would have significant benefits for motorists.

Motor insurance premiums are fundamentally driven by risk. Young drivers, for example, pay higher premiums because they are statistically far more likely to be involved in serious collisions.

If interventions such as graduated licensing successfully reduce that risk, insurance premiums for young drivers should fall over time.

Similarly, tackling ghost plates and uninsured driving would reduce costs currently borne by law-abiding motorists through the MIB levy.

8. Conclusion

The Road Safety Strategy represents an important opportunity to significantly reduce deaths and serious injuries on Britain's roads.

We support many of the measures proposed by the Government. However, the strategy would be strengthened by:

- Introducing a Graduated Driving Licence for new drivers
- Adopting a minimum 12-month learner period for driver training
- Ending the use of intensive driving courses as a route to test readiness
- Strengthening enforcement against ghost number plates
- Maximising the safety benefits of vehicle technology
- Increasing investment in rural road safety infrastructure

With the right policy framework and enforcement mechanisms, the Government's casualty reduction targets are achievable.

However, without structural reform addressing the highest-risk groups and behaviours, there is a risk that the targets will remain aspirational rather than deliverable.

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