

NORTH LINCOLNSHIRE COUNCIL

**HIGHWAYS AND PLANNING
CABINET MEMBER**

**ROAD SAFETY POST 2010
RESPONSE TO DEPARTMENT FOR TRANSPORT CONSULTATION**

1. OBJECT AND KEY POINTS IN THIS REPORT

- 1.1 To advise the Cabinet Member of results of local consultation on Department for Transport (DfT) proposals for road safety post-2010.
- 1.2 To seek Cabinet Member approval to submit response to DfT.

2. BACKGROUND INFORMATION

- 2.1 In May 2009, the Cabinet Member considered a report relating to DfT proposals for a draft national road safety strategy, post-2010. The Cabinet Member decided that the Head of Safer Roads should prepare a North Lincolnshire Road Safety Partnership response to the draft strategy and submit this for Cabinet Member approval in time for submission to the DfT by the due date of 14 July 2009. The Cabinet Member also decided that the North Lincolnshire Road Safety Partnership should contribute to and support a Humber region response, developed through Safer Roads Humber.
- 2.2 Following consultation with partner organisations, a draft Humber sub-region response has been prepared, on behalf of all four local highway authorities (North Lincolnshire Council, East Riding of Yorkshire Council, Hull City Council and North-East Lincolnshire Council). The draft response is appended to this report.

3. OPTIONS FOR CONSIDERATION

- 3.1 The Cabinet Member has three options:
 - approve the draft consultation response
 - amend the draft consultation response
 - decline to respond to the consultation

4. ANALYSIS OF OPTIONS

- 4.1 Approving the draft response will enable North Lincolnshire's views on the DfT proposal to be submitted and considered by the DfT. It will also add weight to the Humber sub-regional response, to which North Lincolnshire has contributed through Safer Roads Humber.
- 4.2 The Cabinet Member may wish to see the draft response amended, for example to reflect any local issues, which may not be covered in the current draft.
- 4.3 Declining to respond to the consultation would deny us the opportunity to influence the DfT's final drafting, which, in light of some of the concerns we have about the proposals, would not be advisable.

5. RESOURCE IMPLICATIONS (FINANCIAL, STAFFING, PROPERTY, IT)

5.1 Financial:

- 5.1.1 There are no immediate financial implications to this report, but achieving the DfT's proposed 2020 casualty reduction targets is likely to require significant additional and sustained funding over the coming years.

5.2 There are no staffing, property or IT implications to this report.

6. OTHER IMPLICATIONS (STATUTORY, ENVIRONMENTAL, DIVERSITY, SECTION 17 - CRIME AND DISORDER, RISK AND OTHER)

- 6.1 Road safety initiatives have significant potential to impact positively on the environment. For example, reducing speeding reduces noise and pollution. Improving safety for pedestrians and cyclists encourages greater use of these modes of transport, as an alternative to the car. The DfT consultation document makes reference to five key goals within the DfT's 'Sustainable Transport System' initiative (within the context of which the road safety strategy proposals have been developed). Included in these is, 'tackling climate change'.
- 6.2 Road safety enforcement impacts positively on reducing crime and disorder. A number of vehicles stopped for driving offences have resulted in other criminal activity being detected. One of the five key goals (see 6.1 above) is, 'health, safety and security'.
- 6.3 Regarding diversity, one of the five key goals is 'equality of opportunity'.
- 6.4 On a more general note, achieving road safety objectives without unnecessarily inconveniencing road users or adversely affecting commercial and business activity, remains a constant challenge. One of the five key goals is, 'supporting economic growth'.

7. OUTCOMES OF CONSULTATION

- 7.1 The Safer Roads Humber Working Group considered the proposals at a special meeting on 2 June 2009. Representatives from all four unitary authorities, Humberside Police, Humberside Fire and Rescue Service, Her Majesty's Court Service, Central Ticket Office, the Highways Agency and Safer Roads Humber attended the meeting. There was broad agreement on what our response should be to the proposals and, where there were differences of opinion, a consensus was reached, which is reflected in the draft response, appended.
- 7.2 The North Lincolnshire Road Safety Partnership considered the proposals at its meeting on 18 June 2009 and were content with the response developed at the Safer Roads Humber Working Group.
- 7.3 The Local Strategic Partnership's Community Resilience Board were also content with the Safer Roads Humber response.
- 7.4 Once the DfT has assessed the consultation responses and confirmed its final strategy, the challenge will be delivering that strategy. Consultation with local communities is scheduled to take place in the autumn, to discuss how best this can be achieved.

8. RECOMMENDATIONS

- 8.1 The Cabinet Member approves the draft response to the DfT consultation.
- 8.2 The response be submitted to the DfT by the due date of 14 July 2009.

SERVICE DIRECTOR HIGHWAYS AND PLANNING

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Background Papers used in the preparation of this report:

Highways and Planning Cabinet Member report, "Road Safety Strategy post-2010, Department for Transport Consultation", dated 19 May 2009.
Department for Transport publication, "A Safer Way: Consultation on Making Britain's Roads the Safest in the World", dated April 2009.

APPENDIX

A Safer Way: consultation on making Britain's roads the safest in the world

The following (in blue) are the proposed responses to the DfT's consultation questions:

Vision and Targets

1. Do you agree that our vision for road safety should be to have the safest roads in the world?

There needs to be a clear reference to central resources to support the vision.
Needs to be a definition of what we mean by safest roads in the world.

2. Do you agree that we should define a strategy running over twenty years to 2030, but with review points after five and ten years?

The following 3 points need to be considered:

1. Is 20 years the right period of time to define the strategy over? Is it too long?
2. If the strategy is taken over 20 years, will it retain its relevance? It is this aspect of the proposals that we feel necessitates the definite need for review points, perhaps every five years but certainly no less frequently.
3. Who will own the strategy in 20 years?

3. Do you agree that our targets should be to reduce?

- Road death by at least 33per cent by 2020 compared to the baseline of the 2004-2008 average number of deaths;
- The annual total of serious injuries on our roads by 2020 by at least 33 per cent;
- The annual total of road deaths and serious injured to children and young people (aged 0 –17) by at least 50 per cent against a baseline of the 2004-08 average by 2020;
- By at least 50 per cent by 2020 the rate of KSI per km travelled by pedestrians and cyclists, compare with the 2004-08 average?

The Group see the first as a positive target but because numbers of deaths are so small locally, yearly variations must be taken into account. Inevitably the media and Pressure Groups will focus on this figure alone to "prove" a failing. Traditionally the KSI figure has been used because it is more statistically relevant.

Aiming to reduce the number of serious injuries by 33% seems a sensible target. Although it would be interesting to know how this figure was arrived at?

Regarding children and young people, this is an area, which Safer Roads Humber already focuses on, especially looking at pre-drivers in an attempt to address the problem of 17 to 25 year old casualties.

A suggestion from the Group is to revise or add another target to look at as 16 years and under which will be mainly focussed on measures to reduce deaths outside the car and as

passengers, whilst the problem with 17 – 25 years is around car usage (drivers and passengers).

There is a major problem with the target of reducing the rate of KSI per km travelled for pedestrians and cyclists. How will this be measured? How will consistent measurements be guaranteed? The rationale behind this target is understandable but there is a danger that more time and resource will be spent in measuring performance than tackling the issues.

The Group is concerned that motorcyclists were not mentioned as a specific target group when, as the consultation states, they represent 20 per cent of fatalities but just 1 per cent of traffic.

The Group would also like to see more ownership of these targets from other Government departments: - Education, Home Office and Public Health all benefit from safer roads and fewer casualties and all have a role to play in reducing them. Shared targets would further encourage inter-department working.

4. We are proposing a set of indicators in order to help us monitor performance. Do you believe these covers the right areas?

1. Rate of road death per 100 million-vehicle km
2. Rate killed or seriously injured pedestrian per 100 million km walked
3. Rate of killed or seriously injured pedal cyclists per 100 million km cycled
4. Rate of killed or seriously injured motorcyclists per 100 million vehicle km
5. Rate of killed or seriously injured car users per 100 million vehicle km
6. Number of killed or seriously injured casualties resulting from collisions involving drivers under the age of 25
7. Number of people aged over 70 killed or seriously injured in road collision per 100,000 population aged over 70
8. Number of people killed in road collisions on rural roads
9. Number of pedestrians killed or seriously injured per capita in the 10 per cent most deprived Super Output Area compared with 10 per cent least deprived
10. Number of people killed where at least one of the drivers or riders involved was over the legal blood alcohol limit.
11. Number of car occupants killed who were not wearing a seatbelt
12. Proportion of vehicles exceeding speed limits
13. Cost of road traffic casualties

The Group believe there are inherent difficulties in measuring indicators number 1 to 5 for the same reasons as the target related to cyclists and pedestrians. After further discussion outside the workshop, some members stated that the measurement proposed should NOT be used in any of the categories. It is noted none of the Group had an issue with the categories proposed.

The Group agree that the number of KSI casualties resulting from young driver collisions should be measured and is in fact already monitored monthly by Safer Roads Humber.

The Group are unsure about indicator 7 regarding the number of over 70s involved in collisions per 100,000 population aged over 70. Firstly, why is this measured per population rate when the under 25 year old drivers are not? Secondly, to accurately determine the population rate locally will be difficult as census data is invariably out of date. Finally if this measure is to remain as it is: would it not be better to measure involved in collision not just injured?

A clear definition of “rural” road needs to be produced ensuring uniform and accurate measures, nationally.

There are similar problems regarding the deprivation indicator as it measures number per capita. We would seek further clarification about how the DfT would seek to measure this and how regional variations in deprivation would be accounted for.

The Group agrees with measuring the number of people killed where at least one of the drivers or riders involved was over the legal blood alcohol limit. Indeed, blood alcohol and toxicology tests are already standard procedures in fatal collisions. Are there any plans to extend the measurement of drug use to serious (non-fatal) collisions?

The Group agree with measuring the number of car occupants not wearing a seatbelt. This is already measured there are however some concerns over the validity of the data as it is difficult to determine this point, other in a detailed death investigation.

The Group would like more information regarding the proportion of vehicles exceeding speed limits – is this measuring the number of vehicles involved in collisions who were exceeding the speed limit or does it refer to all vehicles and would be gathered via traffic surveys? If this relates to collisions then there are reporting issues with Stats 19 contributory factors, which could restrict the validity of this measure. After discussion outside the meeting, it was felt this measure should be removed as this is a separate issue relating more to speed limit reviews as oppose to a measure of success in reducing casualties.

The Group agree that the cost of road traffic casualties is a good measure.

One point the Group would like to make regarding this list of measures is that there is a danger that more time will be spent on obtaining data instead of focusing on interventions.

The group specifically noted the following points:

- Relevance to geographic area needs to be recognised and measures adjusted accordingly
- Once measured, plans must be drawn and implemented to address the issue
- Will the measures be imposed on LA's or will LA's be able to select the measures they wish to adopt.

Context

5. We have identified a number of factors that may affect our ability to deliver road safety improvements in the future world we are planning for. Do you think we have taken account if the key risks and opportunities? Are there others you would add?

- Environmental
 - More carbon-constrained
 - Land-use patterns becoming more concentrated around urban areas
 - Changing travel patterns – more walking, cycling and motorcycling
 - Changing vehicle mix – a greater proportion of smaller, lighter vehicles and different fuels
- Economic
 - Changes in demand for travel, probably seeing an increase in the longer term
 - Increased long-distance freight traffic
 - Increase in light goods vehicles, especially for local deliveries

- Increasing use of, and familiarity with, technology
- Social
 - Busy lives, involving multi-tasking and immediate communications
 - Stronger local democracy
 - Changing demographics, with an ageing population and greater proportion of female drivers
 - Greater demand for road travel for leisure purposes

The Group believe that the key risks and opportunities have been listed. The Group would add that the length of the current economic downturn would have an effect on road safety. It will affect several of the points listed, such as changing travel patterns (further decrease in car use) and a decrease in travel, especially freight and light goods vehicles. There will also be fewer new cars in circulation which will not only slow the introduction of new technologies but will also mean that older and more unsafe second-hand cars will be in circulation.

Another factor, which may affect the ability to deliver road safety improvements, is relating to resources (staff and funds) and firm commitment is needed from the DfT to assist at a local level to ensure this isn't a problem.

The Group specifically noted the following points:

There is an opportunity to include

- Changes to organisational remits
- Changes to priorities
- Training and education

Changes in organisations remits and priorities are also a potential risk.

There is no reference to driver's responsibility and ownership of the problem.

Two additional areas were identified i.e. Political and Financial. There must a lead from the Government to manage changing agendas and priorities, both locally and nationally. Financial provision must be robust to ensure delivery of objectives.

6. We think that the key challenge of road safety from 2010 is better and more systematic delivery, rather than major policy changes. Do you agree?

There was some debate on this point and differing opinions were put forward; both points of view are detailed below.

Some members of the Group did not agree with the statement, 'that the key challenge of road safety from 2010 is better and more systematic delivery, rather than major policy changes'. This alludes to us simply continuing to do what we are doing at present. We believe that, as well as continuing to do what we do (where it is effective) and continuing to strive for efficiency gains, there also needs to be radical changes in selected areas, including (in some cases) increased resources to support these changes.

Others in the Group agree with this statement in that we seem to be on the right track locally in delivering road safety systematically.

Subsequent feedback from other consultees reiterated the need for radical policy changes, to provide the impetus for significant and sustained casualty reduction, to the challenging levels proposed.

A 33% reduction is a challenging target, perhaps more challenging than the previous 40% reductions. The latter has, in part, been achieved as a result of being able to address treatable, high frequency casualty causation factors. For example, engineering interventions at casualty cluster sites and camera enforcement of speed limits. Although the latter has been essentially self-funding to date, expansion of the scheme (e.g. to enforce average speeds) is unlikely to be cost-neutral. Also, engineering interventions tend to be moving away from concentrated casualty-cluster sites (the majority of which have now been treated) towards 'route treatments', where the funding has to be spread over a greater area and the casualty-reduction returns are commensurately reduced

We accept, of course, that the principles of diminishing rates of return apply to casualty reduction and, indeed, that is recognised in our current 5-year road safety strategy. As such, there is a limit to justifiable road safety resource investment levels. A starting point to determining this limit might be a 1-1 return on investment, based on the nationally agreed cost of casualties.

However there seems to be two areas missed on the strategy:

- Road user responsibility – there is no mention on how members of the public can reduce casualties by taking responsibility for their actions and attitude. There is no mention of driver, rider, cycle and pedestrian training in relation to road users take actions to do this. The targets **cannot** be achieved if driver attitudes and behaviours are not changed and the need for the driver to take responsibility for his/her actions is not recognised and accepted.
- This strategy is very much aimed towards the local authorities but there needs to be more explicit reference to other agency involvement. The health sector has the most to gain but it doesn't seem to make any reference to how they can get involved.

7. This consultation document sets out the current evidence on the key road safety challenges. Do you agree with our (DfT) analysis? Would you highlight any others?

- Key challenges
 - Achieving faster progress in reducing the number of deaths
 - Pedestrian and cyclist casualties in our town and cities – particularly in deprived communities
 - Protecting children and young people
 - Protecting motorcyclists
 - Rural roads
 - The geographical variation in performance
 - Poor road users behaviour amongst a few
 - Illegal and inappropriate speed

The Group would add that there is no emphasis on personal responsibility in these key road safety challenges. The Group would also like to ensure that roads themselves are fit for purpose and that road maintenance should be a priority.

The following additional challenge was also noted:

- Occupational road risk

If there is too much emphasis on reducing deaths this could increase the number of crashes but of reduced severity.

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New performance framework

8. We are proposing a number of measures to support the effectiveness of the road safety profession. Do you think they will be effective? What else might need to be done?

- Improvement in the way we manage road safety information – more advice and best practice information sharing
- Annual data on local road safety performance
- Working with local agencies to build capacity
- Encouraging self help among LA and build upon the Time Bank concept
- Partnership with professional bodies to champion skills initiatives and professional development.
- Develop stronger partnerships with all media and have media organisations as true positive partners.
- Provide political advocacy and leadership championing the road safety profession and its work
- Provide an online database combining accident and socio-demographic data (MAST)

The Group believe these measures should be effective. In recent years, the Highways Agency has collated information locally and shared best practice across the country. This has proved to be very useful. By comparing experiences from elsewhere it is possible to learn from each other. There should, however, be a central point for such data so that only official figures are used for comparisons. Generally these measures are the support the road safety profession requires. Safer Roads Humber is, a 'best practice' example of local agencies working together to build capacity

Annual data on road safety performance should be used positively, to support local partnerships, not to generate 'league tables', as these often do not reflect particular local circumstances, which impact on road safety

It would be good to see an extension of Time Bank membership to other organisations than local authorities in order to maximise information sharing.

The provision of an online database combining collision and socio-demographic data is a major step forward in analysis and subsequent targeted interventions.

A timely release of Think! Material in plenty of time enabling local campaigns to be run alongside national adverts. More proactive support from Think! particularly with materials in relation to young drivers.

Whilst it is generally agreed the principles would be effective there is a concern over capacity to deliver which needs to be considered.

The Group felt a higher profile for road safety professionals, perhaps through enhanced training and development and enhanced professional status should be considered.

9. Do you agree that an independent annual report on road safety performance, created on an annual basis would be a worthwhile innovation?

The Group would like to ensure that an independent annual report would be a comprehensive analysis of performance and would incorporate examples of best practice

together with timely and accurate data. It needs to supply much more information than Road Casualties Great Britain currently does if it is to be worthwhile.

Care needs to be given that the measures identified do not become a league table.

10. Do you agree that the Road Safety Delivery Board should be tasked with holding Government and other stakeholders to account on the implementation of a new national road safety plan?

The Group agree that there should be a Road Safety Delivery Board tasked with holding stakeholders to account for the implementation of a new national road safety plan. We think it is important that there is such a thing as a consistent national road safety plan. We would like to know who exactly the Board will comprise of. Any Board would need to have no political allegiance and hold Government to account.

Roads and Local Authorities

11. Do you agree that highway authorities reviewing and, where appropriate, reducing speed limits on single carriageway roads will be an effective way to address the casualty problem on rural roads? Are there other ways in which the safety of rural roads can be improved?

There are issues with reducing the speed limit on some rural roads and not others. There needs to be a consistent national standard applied so that the driver is not confused.

Reducing the speed limit, where it is appropriate, will be costly in terms of additional signage and subsequent enforcement. However, a blanket reduction in the national speed limit is also not appropriate. There could be more emphasis on adopting a forgiving network by either removing or protecting hard obstacles.

There also appears to be a strong emphasis on speed and rural roads when poor observational skills are often a major issue. Provision for education and training needs to be addressed. Marketing as part of the education process needs to be delivered, public buy in is essential to success. All changes need to be data led. Addressing the problems of rural roads will require substantial funding whatever the most appropriate solution.

Clarity is needed on the proposal; is the intention to keep the national speed to 60mph but dropped to 50mph where appropriate as now, or is the suggestion that it drops to a blanket 50mph?

There were concerns from of the Group if the national speed limit is dropped to 50mph as it was felt that in many cases there is nothing wrong with the current system. Frustrations and dangerous driving can result if the speed limit is not appropriate for the area – it needs to be clear to the driver why limits are reduced and the physical road environment needs to back this up. E.g. why would you have a 50mph limit on a long straight road with no hazards but a driver would recognise the dangers if there were many hazards.

A forgiving environment needs to be balanced against the overall environmental impact e.g. removing trees just in case someone crashes into them versus the visual impact and lack of wild life habitat.

It must be recognised and stressed that irrespective of the speed limit a bad driver is a bad driver; education, training and focus on changes to driver behaviour need to run alongside any proposed changes.

12. How can we most effectively promote the implementation of 20mph zone scheme in residential areas? What other measure should we be encouraging to reduce pedestrian and cyclist casualties in towns?

In order to achieve compliance with 20mph zones, there must be public acceptance. If the public do not understand why a zone is in place, they are unlikely to respect it. Successes should be advertised to explain to the public why schemes are in place. One local example of this is the mixed priority scheme on Newland Avenue in Hull. There is a local perception that this scheme has made the road significantly more dangerous and yet the statistics show quite the reverse.

Regarding reducing cyclist casualties in towns, long-term cycle strategies need to be adopted to ensure that cycle lane implementation is well thought out and not rushed and inappropriate.

Some felt that increasing the number of off-road cycle lanes would be beneficial.

Again there will be significant costs needed to promote and implement and funding will need to be allocated.

13. How can we provide better support to highway authorities in progressing economically worthwhile road safety engineering schemes?

Again, funding needs to be provided. The provision of cross organisation collision investigation needs to be pursued. Sharing of best practise and data will enable sound decision-making and support effective and economically viable schemes.

The attendees commented the consultation was very unclear i.e. national reduction or local authority management of the rules?

It was also noted that there is an independent planning process for cycles and pedal cycles. There needs to be a manual for streets.

Any system should not be overly prescriptive, which might stifle / restrict innovation. Consideration should be given to greater re-investment of highway-related tax revenues into road safety initiatives.

One of the problems faced by local highway authorities is resistance to road safety schemes by local communities that don't agree with the proposals due to perceptions of inconvenience (eg increased journey times).

Vehicles

14. What should Government do to secure greater road safety benefits from vehicles?

Care is needed to ensure that it is not just about driver safety but that vehicles are designed with other road users in mind.

Improved and wide-ranging changes and provision of public transport infrastructure.

In current financial climate, any benefits need to be cost effective and necessary.

Encourage focus on pedestrian safety.

Could consideration be given to developing a 'road safety scoring' system for different makes of car (similar to the energy-efficiency ratings you see on washing machines and fridges?)

It is felt that the recent government initiative to encourage older cars to be scrapped, in exchange for £2,000 credit, was a positive step. Should consideration be given to having an age limit on vehicles, which would ensure all vehicles then have minimum safety standards?

15. Do you agree that, in future, crash avoidance systems will grow in importance and will have the potential to greatly reduced casualties?

Technological innovation is inevitable and such systems have the potential to greatly reduce casualties but there must continue to be an emphasis on driver responsibility and skill levels.

16. How can we best encourage consumers to include safety performance in their purchasing decisions?

It may be possible to standardise road safety features so that consumers are not aware that they are making a road safety choice. It could be possible to publish a league table of vehicles to shame manufacturers into including safety features as standard.

Consideration could be given to the Installation of black box technology unique to each driver, which gives you feedback on your driving BUT can be used in evidence if things go wrong. This would of course need a change in legislation.

Incentives are an alternative. Incentives could be provided and funded by Insurance companies for example. Alternative incentives could include tax exemption.

Behaviours

17. We have highlighted what we believe to be the most dangerous driving behaviours. Do you agree with our assessment?

- Drink driving
- Drug driving
- Speed
- Failure to wear a seat belt
- Careless driving
- Also includes uninsured and unlicensed drivers and compliance with HGV licenses

The Group agree with the assessment but believe there should be more emphasis on hazard perception and distraction. It is not necessarily about illegal driving but concentration. Again driver behaviour and attitudes need to be addressed.

Could consideration be given to more stringent testing. For example, in Germany, no new driver is allowed to take to the road without having already passed a simulator test (risk identification). In addition they should have attended a minimum number of seminars on driving and road safety. When learning there is also a minimum number of lessons before they can apply for test. If caught committing a moving traffic offence in the first two years then they start again.

Other consultees agreed, stating that more analysis needs to be done on the effectiveness of the driving test – this is seen as a very important point.

18. What more can be done to persuade the motoring public that illegal and inappropriate speeds are not acceptable behaviours?

There should be less court leniency so that points actually lead to driving bans rather than the mitigation route being over-used.

More focus on the road user's behaviour and their attitude to risk and what THEY can do to reduce casualties.

Emphasis that driving is a privilege and not a right.

Some consultees felt the system of more graduated penalties, so the punishment better reflects the crime, should be extended.

19. What more can be done to encourage safe and responsible driving?

There could be more recognition through insurance companies for no claims. More encouragement should be made for further driving training. There could be an introduction of a graduated driving licence, which added privileges and benefits with additional experience and training.

In addition consideration could be given to

- Financial penalties e.g. increased insurance premiums.
- Restriction on activities e.g. curfew for young drivers.
- Periodic refresher training for drivers, with a focus on attitudes and behaviours as well as skills.
- Joined up databases e.g. DVLA, insurance etc enabling better and more focused enforcement via legal penalties or through insurance penalties

20. Should more be done to reward good driving? If so, what?

How to quantify good driving? There could be financial rewards such as subsidies for driving training and additional benefits for not being involved in collisions through road tax reductions or insurance fees.

It was noted that having no points on your licence does not make you a good driver; it simply means that you have never been caught.

Consideration could be given to:

- Post Court date education, compulsory or voluntary?
- Insurance company incentives.

Consideration could be given to placing more emphasis on employers to take responsibility for the driving behaviour of employees; both supporting employees to become better drivers (potential 'bottom line' benefits) and also taking employees to task, where their driving gives cause for concern.