The Forum of Complex Injury Solicitors

The Forum of Complex Injury Solicitors (FOCIS)

Response to

Department of Transport consultation on Developing the Automated Vehicles Regulatory Framework Call for Evidence

MARCH 2026

About us

The Forum of Complex Injury Solicitors (FOCIS) are a group of pre-eminent solicitors who specialise in acting for seriously injured people in personal injury and clinical negligence claims. The objectives of FOCIS are to:-

- Promote the highest standards of representation for claimants with life-changing injuries;

- Increase understanding in the wider community of issues which arise for those who suffer serious injury;

- Use members' expertise to promote debate and improvements to the law and legal process; and

- Share knowledge and information among members of the Forum.

Further information is available here: https://focis.org.uk/

Membership of FOCIS is intended to be at the most senior level of the profession. The only formal requirement is that members are recognised by their peers as having achieved a pre-eminence in one or more specialist types of serious injury claim. We currently have 24 members, including members from England, Scotland, Wales and Northern Ireland. Nine of the past presidents of APIL are members or Emeritus members of FOCIS. Firms represented by FOCIS members include:

Anthony Gold	Hodge Jones & Allen
Ashtons Legal	Hugh James
Balfour + Manson	Irwin Mitchell
Bolt Burdon Kemp LLP	JMW Solicitors
Boyd Rice Solicitors	Leigh Day
Dean Wilson LLP	Moore Barlow
Digby Brown	Osbornes Law
Fieldfisher	Slater and Gordon
Fletchers	Stewarts
Freeths	Switalskis Solicitors
Gadsby Wicks	

Executive Summary

FOCIS supports the development of a regulatory framework that enables the deployment of automated vehicles (AVs) while maintaining high safety standards, public confidence and effective routes to redress where harm occurs. In our view, regulation must be sufficiently robust to accommodate technological change without diluting established principles of accountability, insurance protection and transparency. Many of the concepts discussed in the Call for Evidence are familiar from other safety-critical transport sectors, and there is value in drawing on those models where appropriate.

FOCIS limits its below responses to those questions within our members' expertise and experience but also approaches this consultation from the perspective of those who represent individuals catastrophically injured on the roads. Our responses are directed at two objectives: reducing the likelihood of serious collisions occurring in the first place, and ensuring that, where incidents do occur, investigations are effective, transparent and capable of supporting timely redress. These submissions also reflect our members' experiences in serious incidents arising in other similar areas, such as air travel.

Where the automated driving system is engaged, responsibility must follow control. Injured persons—whether passengers, occupants of other vehicles, pedestrians or cyclists—should not bear the burden of proving fault within complex technical systems. The compensation framework should operate on a clear, non-fault basis at the point of claim, leaving issues of ultimate responsibility between manufacturers, ASDEs and insurers to be resolved separately.

Of particular concern are situations where self-driving vehicles need to transfer control of the vehicle and issue a demand that the UIC take over control. This might place a UIC in a situation where they are immediately required to respond to an emergency, potentially with inadequate time to perceive or assess a hazard. We consider it important that legal liability for the control of the vehicle is clear in such situations. Such liability should remain with the AV during any such transition period, and it should not pass to a UIC who makes a failed attempt to take control in an emergency.

Compulsory motor insurance under the Road Traffic Act 1988, together with the continuing role of the Motor Insurers' Bureau as a safety net, must remain the foundation of public protection. Public confidence in automated vehicles will depend not only on their safety performance, but on certainty that if harm occurs, compensation will be secure, accessible and insulated from technical and financial uncertainty.

The scope for mass injury and widescale disruption from cyberattacks on the use or control of AVs is perhaps the greatest area of concern. Very robust measures are required to protect the public from terrorists, enemy states or other bad actors seeking to take control of vehicles to cause injury or to otherwise disrupt road usage.

In addition, drawing upon our experience of dealing with aviation disasters, specifically those arising out of deliberate pilot actions related to mental health issues, we consider it important that there are appropriate precautions taken to avoid similar issues arising out of the ability of ADS assistants to remotely take control of multiple AV's and cause mass injury.

Chapter One: Getting AVs on the road

Question 11: In your view, what should be considered when assessing whether an ASDE is of good repute?

The concept of 'good repute' is well established within public service vehicle and goods vehicle regulation, and is also familiar in other safety-critical sectors such as aviation and rail. Any framework adopted for authorised self-driving entities (ASDEs) should draw on those established principles, while remaining adaptable to future technological developments.

In our view, good repute should capture honesty and integrity, competence and operational capability, and ongoing capacity to discharge safety-critical responsibilities. Public confidence will depend on there being appropriate and unlimited insurance in place, consistent with the requirements of the Road Traffic Act 1988. Without that underpinning, effective victim protection is weakened and trust in the regime is likely to suffer.

Question 12: In your view, what should be considered when assessing whether an ASDE is of good financial standing?

FOCIS agrees that financial standing requirements should not be set at a level that unnecessarily excludes new entrants or innovative business models. The regime should be flexible enough to accommodate different corporate structures, provided that public protection is not compromised.

In practice, demonstrating financial standing through appropriate insurance arrangements (rather than only by reference to cash reserves) may offer a proportionate route for smaller companies and start-ups to satisfy an authorisation authority that they can meet their obligations. Comparable approaches exist in other regulated sectors, including civil aviation, and it would be sensible to draw on those models.

Question 19: In your view, what processes should be in place to ensure that authorised vehicles continue to meet the legal safety standard over time?

Ongoing oversight is essential. The body responsible for authorisation should also have responsibility for monitoring continued compliance with the legal safety standard—both for highly automated vehicles and for advanced driver assistance systems.

Our members' experience of civil claims relating to road collisions is that many collisions involve an unexpected combination of several events (e.g. one lane is blocked or closed, then a vehicle breaks down in another lane all at a time when a vehicle in a third lane was in the processing of changing lane). Driver assistance systems may well react to such situations in a way that is unexpected to nearby human drivers. Where automated systems are assuming responsibility for decisions of that nature, rigorous post-deployment monitoring is critical to maintaining or improving road safety and, in turn, public confidence.

Question 23: In your view, should any existing prohibitions on non-driving related activity by a UIC be disapplied?

Yes. In circumstances where the self-driving feature is engaged and the user-in-charge (UIC) is not required to monitor the road, the continued prohibition on mobile phone use appears difficult to justify or enforce. Functionally, using a mobile device for browsing or messaging is comparable to interacting with an in-vehicle infotainment system; both divert attention away from the driving environment. We envisage that Apps (like CarPlay) could be used to disable active mobile phone use if a scenario arose in which the UIC was required to take charge of the vehicle controls.

Any change of this nature would need careful public communication—particularly while mobile phone use remains an offence in conventional vehicles—to avoid misunderstanding during a transitional period.

FOCIS also agrees that core requirements currently imposed on drivers by the Road Traffic Act 1988 should continue to apply, including holding an appropriate licence, not being disqualified, and prohibitions relating to alcohol and drugs.

Question 25: In your view, should there be specific training for a UIC?

Yes. FOCIS considers that structured training is essential. Training should cover the distinction between driving and self-driving modes; what is permitted and prohibited while the vehicle is self-driving; the boundary of immunity and residual liabilities; and the steps required when a transition demand is issued. Even where the UIC is not required to keep eyes on the road while the self-driving feature is engaged, training should emphasise the expectation that a UIC remains alert and capable of responding appropriately.

Training should include a formal assessment.

Where vehicles are hired or rented, the UIC should be required to acknowledge and confirm their understanding of their role before self-driving functions can be activated. Minimum age and licence requirements—analogous to those applied in existing micromobility hire schemes—should be considered, together with practical verification.

Question 26: What knowledge and skills outcomes should the training provide?

Training should ensure that UICs understand when the vehicle is operating in self-driving mode; how to respond to transition demands; the relevance of SAE levels of automation and what is expected of the UIC at each relevant level; and any time limits associated with taking back control following a transition demand.

In addition to conventional driving skills, UICs should be familiar with automated-driving-specific scenarios, including how to take over control proactively where appropriate, safe stopping procedures, incident management, and requesting assistance where required (including, where relevant, from a remote operator).

Training should also explain clearly the circumstances in which a UIC may still be liable for an offence and the exceptions to immunity from prosecution. Those exceptions should be brought to the attention of all UICs and reflected in any onboarding process for hired vehicles.

Question 27: In your view, how frequently should UICs undertake training or tests of their ability?

In the longer term, a standardised assessment covering UIC responsibilities may be appropriate, with periodic review to reflect significant system updates. Reviews should be proportionate and not unduly restrictive, but may need to be more frequent than conventional licence renewal given the pace of technological change.

Consideration should also be given to insurance implications where required training has not been completed but self-driving functions are nevertheless used.

Question 31: In your view, should there be a stated value expected for a transition period duration akin to UNECE Regulation No. 157?

Yes. However, UNECE Regulation No. 157 permits deactivation of the system or initiation of a minimum risk manoeuvre at 10 seconds following the issue of a transition demand. In our member's experience, 10 seconds is likely to be far too long to avoid an incident in many circumstances. However, we appreciate the competing requirement that sufficient time must be given for the UIC to regain situational awareness before retaking dynamic driving control.

Reaction times vary by fatigue, concentration and other factors, but the point of a stated time limit is to promote consistent safety outcomes—particularly for vulnerable road users. Whatever value is adopted, UICs must be made aware of it and understand their responsibilities once a demand is issued.

To inform the determination of what is the suitable time frame for a transition demand we suggest further publication and debate of the range of scenarios identified as likely to lead to a transition demand.

Question 32: In your view, what should the minimum value be, and why?

Standard human reaction times in an emergency are typically within a period of one to two seconds; against that benchmark, a 10-second period appears unworkable unless the Automated Vehicles are sufficiently advanced to safely respond to the full range of emergency situations during the transition period. The minimum value should be set by reference to research and evidence on human response times to emergency and non-emergency prompts, including circumstances where the UIC does not have eyes on the road.

While automated emergency braking may mitigate some risks, clear communication of the transition period remains important—particularly given the potential legal consequences for a UIC. If haptics and vibrations are used as part of the transition demand, it would be surprising if a UIC required anything approaching 10 seconds to regain situational awareness sufficient to resume control.

We note that s7 of the AV Act, concerning transition demands, prescribes that:-

(c)the vehicle will continue to travel autonomously, safely and legally during the transition period and

(e)the vehicle will deal safely with a situation where the user-in-charge fails to assume control by the end of the transition period.

Consequently, it appears to be intended that the AV must be capable of dealing with any true emergency situation before the UIC takes control or even if the UIC fails to do so. We agree that is both appropriate and important.

It is also important to keep in mind in this context that shorter transition periods will give rise to an increased chance of a UIC being required to take control of a vehicle in an emergency situation, quite possibly before they have had any adequate opportunity to perceive or assess any hazard they might be required to respond to. A UIC who is suddenly confronted with such an emergency situation may not, in the agony of the moment, make the ‘right’ decision on taking control of the vehicle. It is not feasible for UICs to be expected to suddenly regain control in an emergency, and so legal liability for the control of the vehicle should remain with the AV during the transition period. There should at the very least be a rebuttable presumption that a UIC who makes a failed attempt to take control in an emergency should not assume legal liability for the use of the vehicle – which should remain with the AV.

Question 33: In your view, should different scenarios require different transition demand protocols, and why?

Yes. The nature of the demand should be proportionate to the risk and the reason for the takeover.

If the demand requires the UIC to take urgent evasive action or manoeuvre the vehicle out of immediate danger, the protocol should be unambiguously urgent (for example, prominent auditory warning supported by haptics). However, as above we have serious doubts that a transition can safely take place during the very short time frame of a true emergency scenario and to even attempt such a transition may create a greater hazard.

Conversely, where a takeover is required for navigation or because the vehicle is experiencing environmental or sensor difficulties, the protocol should avoid prompting an overreaction and may be calmer in tone.

Where different alerts or displays are used for different scenarios, it is crucial that UICs are trained to recognise them and understand what is expected in each case.

Question 34: In your view, should the nature of a transition demand vary depending on the user-in-charge and why?

FOCIS considers that transition demands should follow a consistent format using combinations of sound, lights and haptics, recognising that UICs may have protected characteristics. Consistency and multi-modal alerts are likely to improve accessibility and reduce the risk of misunderstanding.

Question 35: In your view, should standards be established for transition demand interfaces across different vehicle makes and models, and why?

While the detailed technical feasibility is a matter for manufacturers and developers, FOCIS supports the establishment of consistent standards across vehicle types. Users will encounter multiple makes and models, including hired vehicles, and inconsistent interfaces risk confusion and, consequently, reduced safety. Some differentiation may be necessary for larger or specialist vehicles, but core principles should be aligned.

Chapter Two: Once AVs are on the road

Question 39: In your view, what capabilities, if any, other than remotely assisting the ADS and driving the vehicle, should NUICOs generally possess to be able to adequately respond to problems arising during NUIC journeys?

In addition to providing remote assistance, NUIC operators should be able to contact emergency services immediately where an incident occurs and should have clear protocols for escalation.

Question 42: In your view, how should operators and authorities seek to prevent and respond to crimes committed within a NUIC passenger vehicle?

Operators should implement measures to deter and respond to criminal activity within NUIC passenger vehicles, including monitoring technology, clear reporting mechanisms for passengers, and defined responsibilities for any remote operators. During early deployment phases, the presence of trained on-board personnel may be appropriate in some contexts.

Question 47: In your view, how often and in which circumstances would it be appropriate for operators to use remote ADS assistance?

Remote ADS assistance is likely to be most appropriate following an incident, a breakdown, or where a system failure prevents the vehicle from completing a journey safely. Remote assistance may also be needed to manoeuvre the vehicle to a place of safety or to liaise with emergency services.

Provisions should be adopted for the separate certification of command units (or Control and Monitoring Units (CMU)). This will allow Operators of several types of ADS to use a single common CMU type across their organisations thereby reducing training and support costs associated with the use of different CMUs. A key requirement will be to ensure that all CMUs being proposed for separate certification are interoperable with as many types of ADS as possible; this will require adoption of internationally recognised common C2 and Information Exchange standards.

Question 49: What, if any, training, health or skills assessments, qualifications, and vetting should remote ADS assistants undertake or meet to be deemed fit for their role?

Remote ADS assistants should receive appropriate training and robust vetting, including assessment of criminal history and possession of a clean conventional driving licence. Health standards should broadly mirror those applicable to safety-critical driving roles, with carefully defined exceptions where appropriate.

The tragedy of the Germanwings 9525 crash illustrates the real risk relating to the mental health of commercial aviation pilots. We contend that ADS pilots should be treated akin to commercial pilots or perhaps air traffic control operators, with respect to mental health assessments. Air Traffic Control Officers will typically require a Class 3 medical certificate with no established psychological deficiencies, psychotic disorders, or severe personality disorders that could jeopardize aviation safety.

Question 50: In your view, what requirements, if any, should be mandated with respect to the working hours and conditions of remote ADS assistants?

Working hours should comply with applicable working time requirements and be structured to manage fatigue and maintain attention. The fact that a role is office-based should not justify extended hours without adequate rest.

Question 51: In your view, what factors, if any, should determine how many NUIC vehicles a remote ADS assistant should be allowed to support simultaneously?

This should depend on the maturity of the fleet, the complexity of interventions expected, and evidence on the frequency of assistance required. In early deployment, assistants should support only a small number of vehicles.

If remote ADS assistants are able to control multiple vehicles then, as above, that adds to the importance of regular rigorous mental health checks to minimize the risk of a mass disaster.

Question 53: In your view, under what circumstances, if any, should remote driving be permissible for the purpose of vehicle recovery when a NUIC journey cannot be completed by the ADS?

Remote driving should be permissible where the vehicle cannot otherwise reach a safe place to stop or is causing an obstruction. Timely intervention may be necessary to remove the vehicle from the carriageway and facilitate repairs.

Question 54: In your view, under what circumstances, if any, should remote driving be permissible for the purpose of responding to problems during NUIC journeys?

Remote driving may be necessary following an incident or technological breakdown to take passengers or goods to a place of safety.

Question 55: Under what circumstances, if any, should remote driving be permissible for the purpose of routinely completing elements of NUIC journeys outside the ODD of the ADS?

Remote driving outside the operational design domain (ODD) may be permissible to allow passengers to disembark safely or to access alternative travel options.

Question 56: What, if any, training, skills, safeguarding and health assessments, qualifications and vetting should remote drivers undertake or meet to be deemed fit for their role?

Remote drivers should be subject to training and vetting comparable to other safety-critical passenger transport roles, including criminal record checks and appropriate medical standards.

Question 57: What requirements, if any, should be mandated with respect to the working hours and conditions of remote drivers?

Working hours should be comparable to conventional safety-critical driving roles, with appropriate breaks to manage fatigue.

Insurance, data and investigations

Question 66: What, if any, learnings from other insurance models could be applied to any new types of insurance for AVs, and why?

Any approach should support uptake while maintaining strong victim protection, including appropriate and effective cross-border insurance arrangements with all efforts being made to reinstate the rights and protections that British road users, and British users or European roads had pre-Brexit including a direct right of action against the insurer in the victims' home courts.

Question 67: In your view, what risks and opportunities are there for data controllers in sharing this data with insurance companies?

Data sharing can support risk assessment and liability enquiries, provided injured parties can access relevant data and privacy rights are protected.

Question 69: What, if any, costs should be taken into consideration when assessing the impact of regulating the insurance of AVs?

Insurance costs should not deter uptake, but arrangements must preserve the principle of unlimited liability cover for injured victims, including the safety net of the Motor Insurers Bureau providing coverage for uninsured or untraced vehicles.

Question 70: What, if any, benefits should be taken into consideration when assessing the impact of regulating the insurance of AVs?

Clear and transparent insurance arrangements can increase public confidence and uptake.

In-use regulation and incident investigation

Question 72: In your view, how might a regulated body determine if an AV has committed a traffic infraction?

Infractions may be identified through vehicle reporting, enforcement systems and investigation by the in-use regulatory scheme.

Question 73: In your view, what should be taken into consideration in the submission of standardised information to the IUR?

Standardised information should include collision details, parties involved, location, conditions and outcomes, and be accessible to injured victims.

Question 74: In your view, do you think specialist knowledge would be needed during an investigation?

Yes. Investigators should have expertise in AV data, road rules and collision investigation.

Question 75: What records should be retained regarding maintenance and repair history of AVs?

A full service and software update history should be retained and accessible.

Question 76: What specialist knowledge will be necessary to preserve evidence?

Evidence must be preserved securely and in compliance with data protection law to avoid corruption or loss.

Question 77: Beyond investigations, what other purposes could seized material be retained for?

Seized material may support training, system improvement and learning across fleets.

Question 78: What challenges are there regarding access to data relevant to investigations?

Challenges include encryption, data ownership and ensuring injured parties can access relevant information. For example, it is our understanding that Tesla uploads information periodically and immediately after a collision of sufficient strength to deploy the air bag. However, it is also our understanding that the data is anonymized after a period of time making it we are told, very difficult to retrieve.

Question 79: In what circumstances would it be acceptable for seized material to be delivered to someone other than the owner?

Access may be appropriate for authorities, injured parties and their representatives.

Question 81: What additional considerations apply to storage of a seized AV?

Measures may be needed to prevent automated deletion, software updates or data overwriting during storage.

Question 97: What opportunities are there for inspectors to learn from other safety-critical industries?

AV investigations should draw on established models from aviation, maritime and rail sectors.

Question 98: What opportunities and challenges exist to encourage data sharing and a no-blame safety culture?

Transparency will be key to securing and maintain public confidence in automated vehicles.

Question 99: In your view, should there be any limitations placed on an inspector's role and powers considering other safety-critical industries in the UK and internationally, and why?

No there should not be any limitations placed on an inspector’s role, because it is crucial that the inspector can conduct truly independent safety driven investigations without being fettered by considerations of the commercial impact. The purpose of the inspector’s role is stated as: *identify, improve the understanding of, and reduce the risks of harm arising from the use of AVs on roads in GB without apportioning blame or liability on any person in relation to a particular incident*.

This echoes the purpose of the AAIB investigation codified within Annex 13 to the Chicago Convention 1944 and the Civil Aviation (Investigation of Air Accidents and Incidents) Regulations 2018. The AAIB investigation works because of the primacy given to that investigation, most critically, in relation to control of evidence, compelling the production of documentary evidence and the taking of witness evidence. That being said, like for the AAIB, there can be memorandums of understanding between the inspector’s investigation and other safety critical investigations e.g. police and coronial investigation to enable those separate investigations to continue albeit secondary to the inspector’s investigation.

Question 100: Should there be an oversight function for statutory inspectors?

Yes. Oversight is important to ensure consistency, independence and public confidence.

Question 102: How can lessons learned improve pre-deployment and in-use safety?

Lessons can inform testing, mapping and system design to improve safety over time.

Question 103: Are specialist skills needed for statutory inspectors?

Inspectors should have expertise in serious collision investigation and AV data analysis.

Question 104: What considerations should ensure findings lead to actionable recommendations?

Recommendations should be practical, transparent and tracked to implementation.

Question 105: How should reports be developed to ensure transparency?

Reports should be published and easily accessible to the public.

Question 106: Should communication differ in early AV deployment?

Regular public reporting is particularly important in early stages to build public confidence.

Question 107: When specialist technical AV expertise is not available from within the incident investigation function, are there any:

- **operational considerations that should be made before appointing an expert to assist in an investigation?**
- **commercial considerations that should be made before appointing an expert to assist in an investigation?**
- **other considerations that should be made before appointing an expert to assist in an investigation?**

In *Hoyle v Rogers* [2014] EWCA Civ 257, the Court of Appeal considered the value of AAIB Reports, with Clarke LJ describing the character of an AAIB report as "authoritative, independent, prompt and detailed". Those character traits should be maintained and upheld through any appointment of an expert to assist in the investigation. In AAIB investigations, it is commonplace that manufacturers are required to provide input into the investigation both to assist in the extraction/analysis of key data and to assist in its interpretation, but the investigation remains controlled at all times by the investigators.

Question 108: Should there be limitations on material inspectors can retain?

We agree that there is a clear precedent set by the existing UK transport AIBs that protects sensitive personal information and physical material from wider disclosure. However, where an injured party is investigating a civil claim it is essential that such material is disclosed to their legal representatives in a timely and efficient manner.

Question 109: How can evidence held outside the UK be made available?

International agreements should enable access to overseas-held evidence.

Question 110: What guidelines should govern examination and retention of evidence?

Clear procedures should reflect the needs of civil claims and extended limitation periods.

Question 111: What specific purposes, if any, could be considered for the disclosure of evidence obtained by a statutory inspector to ensure that sensitive data and information is managed appropriately?

The disclosure of evidence to assist in other processes is distinct from the management of sensitive data and information. Uploading relevant investigation documents to a public system enables other parties to undertake their own investigations and pursue necessary parties without restriction, and without undermining or interfering with the official investigation. Those investigation documents can be redacted to remove sensitive data and information which should not be disclosed. Disclosure of this evidence, together with reports and analysis of physical evidence would be sufficient to enable parties to undertake their own investigation and/or court action against appropriate parties if it was necessary to commence proceedings prior to the completion of a final report (e.g. due to expiring limitation periods).

Question 112: Should there be guidance on retention and destruction of physical evidence?

Yes. Evidence should not be destroyed until investigations and inspections are complete, or longer if a party to a civil claim has requested longer preservation.

Question 113: What costs should be considered for incident investigation regulation?

Costs of secure storage and resourcing of investigations are relevant.

Question 114: What benefits should be considered for incident investigation regulation?

Clear investigation regimes support public confidence and improved road safety.

Questions 115-121 – combined response : AV Cyber Security

The greatest cyber-related concern is not isolated vehicle interference but the risk of a coordinated or cascading cyberattack affecting multiple automated vehicles simultaneously.

Automated vehicles are software-dependent, network-connected and may share common system architectures. A single exploited vulnerability could therefore affect large fleets at once. Unlike conventional collisions, this creates the possibility of:

- Simultaneous multi-vehicle motorway collisions;
- Urban crashes involving pedestrians and cyclists;

- Secondary incidents caused by abrupt system shutdowns;
- Mass casualty events within a very short time frame.

The potential scale of human tragedy is materially different from traditional road traffic risk.

Such a systemic failure would also raise serious financial resilience concerns. A mass-casualty cyber event could generate unprecedented aggregated claims, potentially concentrating liability in one manufacturer, software provider, or insurer. The framework should therefore consider:

- Mandatory reinsurance limits proportionate to systemic risk;
- Capital adequacy requirements for Authorised Self-Driving Entities;
- A contingency or government-backed compensation mechanism in the event of insurer or manufacturer insolvency following a large-scale system failure.

Without this, injured persons may face prolonged uncertainty and delayed compensation.

Cyber incidents affecting vehicle safety should trigger mandatory and immediate reporting to the regulator, with powers to suspend affected fleets and compel remedial action. Data from compromised vehicles must be preserved and made accessible for independent investigation and civil claims.

A high-profile mass-hack causing multiple fatalities would significantly undermine public trust and could stall adoption for years. A robust, transparent and enforceable cyber safety regime is therefore essential not only for victim protection but for the long-term viability of the sector.

Accessibility

Question 121: Are there wider accessibility considerations in AV deployment?

Accessibility and inclusive design of AVs is essential so that disabled people can be enabled by AV technology providing increased transport options and improving access to communities.

FOCIS would be pleased to engage further with policymakers as the regulatory framework develops.

Ends