



**Chartered
Insurance
Institute**

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**Response to the Coroner's Office of Coventry and
Warwickshire's Regulation 28 Report to Prevent
Future Deaths**

**Harry Joseph Purcell, Deceased and
Matilda (Tilly) Grace Seccombe, Deceased**

Chartered Insurance Institute Response

Chartered Insurance Institute Response to The Coroner's Office of Coventry and Warwickshire's Regulation 28 Report

1. Key Points

We would like to express our sadness over the deaths of Harry Purcell and Tilly Seccombe, and we would like to thank the Coroner for inviting us to help develop a practical approach to improving road safety.

We have also noted the article published by the BBC in which Harry's mother, [REDACTED], called for the more effective adoption of telematics for young drivers.¹ As a profession, we are determined to find ways to avoid tragedies such as this from happening in future.

The issues the Coroner has asked us to consider are:

- *Industry practice does not appear to include a consistent method for identifying when a named driver arrangement may conceal higher-than-expected use by a young driver, with implications for risk assessment and safety.*
- *There is also no uniform approach to how telematics is applied or the need for its use communicated to young drivers. The inquest noted uncertainty about how clearly insurers and brokers explain the safety-related aspects of telematics to young drivers or their families, which may influence decisions made when arranging insurance."*
- In response to these findings, the CII (Chartered Insurance Institute) commits to:
 - Write to all general insurance firms that have been awarded Corporate Chartered status by the CII,² to highlight the publication of the Regulation 28 report and the issues that it raises.
 - Work with insurers, trade associations, road safety groups, driver training bodies, consumer groups and the FCA (Financial Conduct Authority) to stimulate:
 - higher prioritisation of young drivers as potentially vulnerable customers,

¹ BBC (2025), *Show off driver who killed three teens sentenced at:* <https://www.bbc.co.uk/news/articles/clywee36nx5o>

² See <https://www.cii.co.uk/membership/join-us/chartered/> for more information about Chartered status, including Corporate Chartered status.

- greater consistency in the way insurers apply good practice when identifying ‘fronting’ (the misuse of named driver arrangements),
 - greater consistency in the way insurers apply good practice in the promotion of telematics to young drivers, and
 - greater consistency in the way insurers apply good practice to the use of telematics data.
- The guidance will identify:
 - the most effective methods for influencing behavioural change in younger drivers, and
 - the most effective operational processes for proactive risk management, including the way in which data can be collected, interpreted and acted upon.
- The CII commits to completing a consultation period of four months, to June 2026, and publishing guidance by the end of 2026.

2. Background to our response

2.1 Telematics and their impact on road safety

Adoption of telematics rose to an estimated 1.66 million policies in 2022. Over a similar period, between 2004 and 2024, casualties fell almost 40% faster among younger drivers compared to older drivers:

- KSI (killed or seriously injured) casualties from a collision involving at least one younger car driver (aged between 17 and 24) decreased from 12,190 to 4,740, a fall of 61%
- KSI casualties in collisions involving other aged car drivers decreased from 30,967 to 19,368, a fall of 37%³

2.2 Market incentives for telematics

Insurers have used pricing to incentivise younger drivers to adopt telematics.

According to the research firm, Consumer Intelligence, among drivers between the ages of 17-19, '83% find telematics cheaper, with median savings of £2,172 (116% difference)'

From ages 25-29, those considering telematics drops to 51%, as no-claims discounts reduce the cost of traditional insurance, and from age 35, those considering telematics falls below 25%.⁴

2.3 Option to introduce a self-regulatory approach to adopting telematics

A purely self-regulatory approach to forcing more drivers to adopt telematics is unlikely to work.

³ Department for Transport (2025) *Reported road casualties in Great Britain: younger driver factsheet* at: [Reported road casualties in Great Britain: younger driver factsheet, 2024 - GOV.UK](#)

⁴ Consumer Intelligence (2025) *Insurance industry creating 'telematics refugees'* at: <https://www.consumerintelligence.com/articles/insurance-industry-creating-telematics-refugees-as-2000-pricing-penalty-forces-young-drivers-into-surveillance>

There are two reasons for this:

- First, a market agreement (for example, an agreement between insurers to only offer insurance with telematics to drivers under a certain age) could easily be undermined by some insurance firms opting out of the agreement and appealing to customers who want traditional insurance. These firms would benefit from the significant proportion of drivers who dislike the reduction in privacy that comes with telematics (for example, a recent survey by telematics provider IMS showed that 62% of UK motorists were worried about sharing their personal location information).⁵
- Second, the greatest benefits of telematics can only be derived from a range of measures. For example, the research agency, Consumer Intelligence, has summarised some of these approaches as:
 - **‘Reframe Year One:** Position telematics as a "Recognised Driver Journey" – a fast-track to trusted status, not probation
 - **‘Change the Language:** Replace "we monitor" with "you demonstrate"
 - **‘Provide Real Control:** Let customers choose what aspects of driving they want to showcase
 - **‘Create Lasting Value:** Offer permanent recognition status that follows them even if they switch insurers’

Consumer Intelligence concluded, ‘Insurers need to stop selling surveillance and start selling recognition. Our research shows customers who feel recognised and in control have three times higher voluntary adoption rates.’⁶

As a result, prescriptive approaches based on mandating the kind of technology used or the kind of communication given to drivers are unlikely to be the best route to securing safer driving.

⁵ IMS (2026) *Personalised pricing uptake to flatline in 2026 unless UK-based insurers address privacy concerns* at <https://ims.tech/news/connected-insurance-personalised-pricing-uptake-to-flatline-in-2026-unless-uk-based-insurers-address-privacy-concerns/>

⁶ Consumer Intelligence (2025) *Insurance industry creating ‘telematics refugees’* at: <https://www.consumerintelligence.com/articles/insurance-industry-creating-telematics-refugees-as-2000-pricing-penalty-forces-young-drivers-into-surveillance>

2.4 Option to treat younger drivers as vulnerable customers

Although mandating technology or communications in a self-regulating environment may not be the best option to promote safer driving, the FCA approach to vulnerability may provide a better mechanism to secure more uniform adoption of good practice.

The FCA's approach to vulnerability requires financial services firms to adopt reasonable adjustments for groups of consumers who may be at greater risk of harm as a result of 'drivers of vulnerability'. These 'drivers' are:

- Low financial capacity
- Low financial resilience
- Life events
- Illness and disability

The approach requires insurers to address the risks of vulnerability through a process of monitoring consumer behaviour, analysing and learning from the resulting data, and adjusting the firm's proposition to improve outcomes.⁷

There is a strong argument that young drivers and their families are more vulnerable than other motor insurance customers, because:

- Being a new driver is a life event that carries risks – since new drivers are less aware of the risks of driving, and their families are likely to be less aware of the risks of committing fraud through 'fronting'.
- New drivers have lower levels of financial capability than other motor customers, because they are less likely to have experience of repeat purchases of motor insurance.
- New drivers often have lower levels of financial resilience, which may increase safety risks (for example, if they are not able to afford vehicles with non-compulsory safety features).

There is also a strong argument that insurers should develop an approach to younger drivers that will help them to overcome these risks, for example through:

- Better consumer understanding of the risks involved with being a new driver.
- Better consumer understanding of the benefits of telematics.

⁷ Financial Conduct Authority (2021) *FG21/1 Guidance for firms on the fair treatment of vulnerable customers* at [FG21/1: Guidance for firms on the fair treatment of vulnerable customers](#) and Financial Conduct Authority (2022) *FG22/5: Final non-Handbook Guidance for firms on the Consumer Duty* *FG22/5 Final non-Handbook Guidance for firms on the Consumer Duty* at [FG22/5: Final non-Handbook Guidance for firms on the Consumer Duty](#)

- Better product governance, including being more willing to refuse insurance to younger drivers who pose a significant risk.⁸

2.5 CII Commitments

The CII commits to encouraging the insurance community to consider younger drivers as potentially vulnerable consumers through:

- Developing guidance for the profession on the aspects of new drivers that makes them more vulnerable. The CII has recently published guidance for members on vulnerability (*Managing customer vulnerability in insurance and personal finance: A practical implementation guide*) that explores how vulnerability can be put into practice through the effective use of leadership, systems, data management and training, with a particular emphasis on effective data management. We will build on these insights when producing the guidance.⁹
- Working with insurers, trade associations, road safety groups, driver training bodies, consumer groups and the Financial Conduct Authority to build on existing good practice (such as the BIBA *Good practice guide to selling telematics*¹⁰) to stimulate:
 - higher prioritisation of young drivers as potentially vulnerable customers
 - greater consistency in the way insurers apply good practice when identifying the misuse of named driver arrangements
 - greater consistency in the way insurers apply good practice in the promotion of telematics to young drivers,
 - greater consistency in the way insurers apply good practice in the use of telematics data to improve road safety.

In doing so, we will focus on factors identified by telematics providers are areas for improvement, including:

- Methods for influencing behavioural change in customers
- Operational processes for proactive risk management, including the way in which data can be collected, interpreted and acted upon.¹¹

The CII commits to completing a consultation period of four months, to June 2026, and publishing guidance by the end of 2026.

⁸ IMS (2023) *Telematics Rules OK?* at <https://ims.tech/knowledge-hub/telematics-rules-ok/>

⁹ Chartered Insurance Institute (2025) *Managing customer vulnerability in insurance and personal finance: A practical implementation guide* at [Managing customer vulnerability in insurance and personal finance: A practical implementation guide](#)

¹⁰ BIBA (2022) *Good practice guide to selling telematics* at: <https://www.biba.org.uk/technical-updates/good-practice-guide-to-selling-telematics/>

¹¹ IMS (2023) *Telematics Rules OK?* at <https://ims.tech/knowledge-hub/telematics-rules-ok/>