DOLMANS INSURANCE BULLETIN

Welcome to the March 2025 edition of the Dolmans Insurance Bulletin

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If there are any items you would like us to examine, or if you would like to include a comment on these pages, please e-mail the editor:

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REPORT ON

Accidents Outside Schools - Dealing with Dangerousness and Section 58 Defence in Highways Matters

JS v Vale of Glamorgan Council

All Local Authorities will be familiar with the arguments raised by claimants who have allegedly fallen as a result of a defect in the highway. A claimant must prove that their accident occurred as alleged and dangerousness. If these are successfully proved, a Local Authority can attempt to raise its 'Special Defence' under Section 58 of the Highways Act 1980, arguing that it had a reasonable system of inspection and maintenance in place at the time of a claimant's alleged accident.

However, the arguments relating to dangerousness and any Section 58 Defence become more intensified when dealing with matters where the alleged accident occurs near a facility that is frequented by the more vulnerable in society, such as schools, hospitals and care homes, for example.

These arguments were raised in the recent case of *JS v Vale of Glamorgan Council*, where the Claimant's alleged accident occurred in the carriageway outside a school and in which Dolmans represented the Defendant Local Authority.

Background and Allegations

The Claimant alleged that his foot entered a pothole in the carriageway immediately outside a school, whilst attempting to make a delivery to the said school. As a result, the Claimant alleged that his foot twisted and that he suffered personal injuries. The Claimant had stopped his vehicle on the carriageway, as the vehicle gates to the school were locked. The school was owned and controlled by the Defendant Local Authority and the carriageway was part of the adopted highway.

The Claimant alleged that the Defendant Local Authority was in breach of Section 41 of the Highways Act 1980 and/or that it was negligent. The Claimant also alleged that the Defendant Local Authority was guilty of nuisance.

Although the Claimant was put to strict proof as to the circumstances of the alleged accident, the Defendant Local Authority considered it likely that the Claimant would overcome this initial hurdle and prove factual causation accordingly. As such, it was apparent that the Claimant's claim would stand or fall upon dangerousness and/or Section 58 of the Highways Act 1980, if it was accepted that the location was dangerous.

Dangerousness

The Claimant provided a contemporaneous photograph of the alleged pothole, but no measurements, and it was, of course, for the Claimant to prove that the location was dangerous.

The alleged pothole was noted for repair by the Defendant Local Authority just 8 days after the date of the Claimant's alleged accident. The Claimant suggested, therefore, that this meant that the location was indeed dangerous and alleged that the defect was longstanding.

The Defendant Local Authority argued that it does not follow that a particular location is dangerous just because the same is marked for repair. Witness evidence was provided on behalf of the Defendant Local Authority that the alleged defect was noted for repair during the said post-accident inspection, given that the next scheduled inspection was not due for another 9 months and the alleged defect could have deteriorated beyond the relevant intervention level by then. Hence, the appropriate Highways Inspector had requested such repair, using his discretion and as a matter of prudence. The said repair was not requested on an emergency basis.

Indeed, even the Service Request generated from the Claimant's initial notification of his alleged accident classified the alleged defect as being of medium severity only, and this would have been based upon the Claimant's description of the alleged defect provided at the time.

In addition, the Defendant Local Authority relied upon the Claimant's own photographs to illustrate its stance that, contrary to the Claimant's allegations, the location of the alleged accident was not dangerous. It was argued on behalf of the Defendant Local Authority that the Claimant's photographs illustrated that only the surface of the wearing course was deteriorating. Taking account of the fact that the wearing course was laid to a depth less than the relevant intervention level for this particular carriageway, it was argued, therefore, that the alleged pothole was not considered to be dangerous and that this contradicted the Claimant's allegation that the alleged defect had the appearance of being longstanding.

REPORT ON

Section 58 Defence – Claimant's Arguments

The burden of proof in relation to any Section 58 Defence switched, of course, to the Defendant Local Authority and the Claimant raised various arguments in an attempt to dismiss any potential Section 58 Defence.

The relevant carriageway was inspected on an annual basis and was last inspected 3 months prior to the date of the Claimant's alleged accident, when no actionable defects were noted for repair at the said location. As already stated, the Claimant suggested, however, that the alleged defect was longstanding and must, therefore, have been missed during the said pre-accident inspection. However, the Claimant was unable to provide any evidence in support of this allegation.

The Claimant alleged that the location of the alleged defect, in the mouth of an entrance to the school, was particularly subject to a higher degree of pedestrian and cycle use by more vulnerable users.

The Claimant also alleged that the surface of the surrounding area was badly broken, susceptible to vehicle overrun and that rapid deterioration was foreseeable.

The Claimant considered that, in the circumstances, the Defendant Local Authority's system was unreasonable and argued that any Section 58 Defence should fail.

Section 58 Defence – Defendant's Arguments

It was the Defendant Local Authority's position that potholes can and often do appear very suddenly. Having adduced no evidence to the contrary, the Claimant faced difficulty in proving the assertion that the alleged defect was longstanding.

The Defendant Local Authority's inspection records indicated that the Highways Inspector for the area had noted several repairs at different locations during his inspections, indicating that he was doing his job properly and was vigilant.

The Defendant Local Authority admitted that the area was noted for repair following the Claimant's alleged accident, but that this was actioned as a matter of prudence, as already referred to above. It was also argued that Defendant Local Authority did not fall to be judged with the benefit of hindsight.

There was no evidence that the Defendant Local Authority was on notice of the alleged defect and no evidence that the Defendant Local Authority had failed to abate any alleged nuisance. Indeed, there were no reports of any previous complaints and/or other accidents relating to the alleged defect during the 12 month period prior to the date of the Claimant's alleged accident.

Evidence of the Defendant Local Authority's inspections and system were adduced. This indicated that there were no issues with annual inspections being undertaken at the relevant location, even though the carriageway was outside a school. In support of this, it was reiterated that there were no previous complaints and/or accidents, despite the location being used frequently and on a regular basis by many different highway users.

New Risk-Based Approach

The Defendant Local Authority had moved to a new risk-based approach to its system for highways inspection and maintenance some time after the date of the Claimant's alleged accident. The frequency of inspections within the Defendant Local Authority's Highways Network was considered and there was no recommendation to change the frequency of the carriageway inspections at the location of the Claimant's alleged accident, which remains the same to date.

The Defendant Local Authority, therefore, rejected the Claimant's suggestion that annual inspections were insufficient and inadequate for the particular location and that 6 monthly inspections at least would be more reasonable. The point was made, however, on behalf of the Defendant Local Authority, that the pre-accident inspection had taken place 3 months prior to the Claimant's alleged accident, which would have been well within any such 6 month period anyway.

Discontinuance

Some time was spent presenting the Defendant's arguments, through Standard Disclosure and Witness Statements provided by relevant personnel from within the Defendant Local Authority's Highways Department. This evidence sought, in particular, to deal with the Claimant's arguments and pleaded allegations regarding dangerous and the Defendant Local Authority's system on inspection and maintenance, which was crucial for the success of any Section 58 Defence.

Indeed, the time and effort put into the Defendant Local Authority's Defence and evidence paid dividends, when the Claimant's claim was discontinued following exchange of Witness Statements.

Comment

Although the Claimant's alleged accident in the above matter occurred before the new risk-based approach to highways inspections and maintenance was implemented, the argument that the relevant system for the carriageway outside the school remained unchanged even under this new approach, no doubt, influenced the Claimant's decision to discontinue his claim following exchange of Witness Statements.

This resulted in savings for the Defendant Local Authority, not only in avoiding any payment of the Claimant's damages and costs but also, given that this was a Qualified One-Way Costs Shifting (QOCS) matter, the parties' costs that would have been incurred had the matter proceeded to trial.

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CASE UPDATES

Animals Act 1971 - Fundamental Dishonesty - Procedural Issues

Boyd v Hughes
[2025] EWHC 435 (KB)

The Claimant was employed by the Defendant as a rider and stable hand, and sustained a serious arm injury when they fell from a cantering horse. The Claimant was a very experienced horsewoman. The Defendant carried on a business as a racehorse breeder and trainer. The Claimant brought a claim under Section 2(2) of the Animals Act 1971. There was no claim in negligence.

Animals Act 1971 ("the Act")

The Act is designed to provide strict liability against animals which are dangerous, either because they belong to a dangerous species (lions, tigers, etc) or because, albeit the species is usually non-dangerous (dogs, cats, etc), the specific animal has abnormal characteristics making it dangerous, or it is dangerous under certain circumstances. Liability for non-dangerous species is governed by Section 2(2) but there has been much criticism in case law with regards to the way in which this section has been drafted.

Section 2(2) of the Act provides:

"*Where damage is caused by an animal which does not belong to a dangerous species, a keeper of the animal is liable for the damage (…) if:*

(a) The damage if of a kind which the animal, unless restrained, was likely to cause or which, if caused by the animal, was likely to be severe; and

(b) The likelihood of damage or of its being severe was due to characteristics of the animal which are not normally found in animals of the same species or are not normally so found except at particular times or in particular circumstances; and

(c) Those characteristics were known to that keeper or were at anytime known to a person who at that time had charge of the animal as that keeper's servant …".

CASE UPDATES

The Claimant's case was that the damage (personal injury) was of a kind which the horse, unless restrained, was likely to cause and/or if damage was caused by the horse, it was likely to be severe. Further, the likelihood of the damage, or of it being severe, was due to characteristics of the horse which were not normally found except at particular times or in particular circumstances.

The Claimant alleged that the horse displayed the characteristic of shying/jinking and that this was because of particular circumstances. Whilst all horses can shy on occasion, they only do so when triggered to do so by particular circumstances. In this case, the cause of or reason for the horse shying was not known, but the Claimant asserted that it was likely that the horse "perceived a threat". The horse was more prone to shy/jink than other horses of its age and/or to do so more violently. The Defendant was an experienced racehorse trainer and was fully aware of the characteristic of the horse shying/jinking due to what was perceived to be a threat (which meant that the knowledge requirement was satisfied).

The Defendant accepted that they knew shying can be a characteristic of all horses. However, the horse in question was no sharper than any other horse of the same age.

The Defendant's case was that the Claimant had not satisfied each of the three of the subsections under Section 2(2), namely:

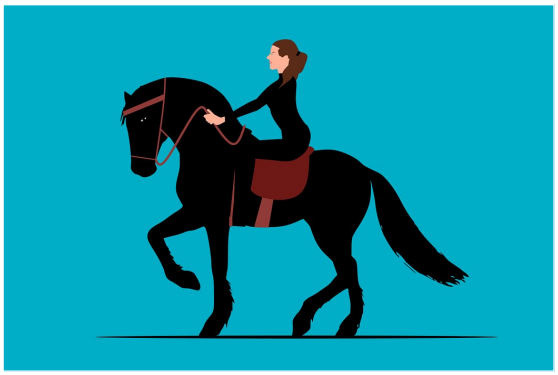
(a) It had not been established that the horse did actually shy/jink and if it did the cause of its movement was unknown.

(b) Shying at a perceived threat is not a characteristic "at particular times" or in "particular circumstances" which was a requirement of Section 2(2)(b).

(c) It was not "reasonably to be expected "that a shy would result in the Claimant suffering any damage through a fall.

(d) It was also not likely that any injury sustained would be serious.

CASE UPDATES



Held

The Claimant's claim failed in that:

- Section 2(2)(a) - the Claimant failed to establish that the injury she had suffered was either of a kind which the horse was likely to cause or which, if caused, was likely to be severe.

- Taking the issue prospectively and with no more particularity, a sudden jink/shy/side-step whilst a horse was moving was not likely to unseat a rider; it would not be a reasonable expectation that a rider would fall off. It was something that might happen; a possibility; but a mere possibility was not enough. It was not in the same category of severe movement as a bolt, buck or rear (when in some cases the intention of the horse will be to unseat the rider). The Claimant was a professional rider and there was a lack of previous falls.

- The Court was not satisfied that if a person fell from a moving horse as a result of it shying/ jinking/moving suddenly to the right, it was likely that they would suffer severe injury.

- The Claimant had failed to show for the purposes of Section 2(2)(b) that the likelihood of injury or of it being severe was due to characteristics of the horse which were not normally found in horses or were not normally so found except at particular times or in particular circumstances. Whilst the cause of the horse's movement was unknown, on the balance of probabilities, it had seen or heard something, or thought it had seen or heard something, which it thought required it to side-step or shy/jink sharply to the right and back again. This was a general, normal characteristic of horses to shy/jink or move sharply in response to a wide range of sights or sounds, which could occur at many times and in many circumstances. There was a material difference between a horse that rears, bucks or bolts in response to being startled or frightened by some identifiable external stimulus, or made to move forward when it does not want to do so, and a movement sideways in response to something which a horse sees or hears, or believes it sees or hears, when it is a wholly unpredictable response to an unidentifiable, ordinary and every day part of the environment.

CASE UPDATES

Fundamental Dishonesty

Allegations of fundamental dishonesty were raised against the Claimant and the Court heard medical evidence (lay and expert) and detailed submissions upon the issue from both parties. The Defendant's case was that the Claimant had exaggerated the level of her symptoms and ongoing disability; most notably when examined by the medical expert instructed on behalf of the Defendant.

The Court accepted that the Claimant deliberately exaggerated/overplayed her symptoms to two of the medical experts. The Claimant had also not disclosed to the medical experts that she had resumed football and rugby training. A statement within her Witness Statement that she could also not throw darts right-handed was not true. These matters established 'dishonesty'.

However, the Court was not satisfied that the dishonesty was fundamental. It was recognised that the Claimant's dishonest attempts to bolster a valid claim through exaggeration may have had some impact on an award for general damage but, after some hesitation, the Court was not satisfied that the Defendant had established that taken together the effect could properly be categorised as fundamental. It was a dishonest "embellishment" in an attempt to underpin an essentially honest claim.

Procedural Issues

The Claimant's claim had been issued with a limitation of £100,000. The Claimant's full valuation had never exceeded £500,000. The Claimant's claim should have been issued in the County Court. It was the wrong approach to consider a personal injury action of such a value as being "at the lower end of the High Court jurisdiction" so that it axiomatically justified issue in the High Court without adequate consideration being given to issue in the County Court.

The parties had also failed to adequately consider whether liability should be determined as a preliminary issue. This was the approach adopted in each one of the Animals Act cases which were cited to the Court. The Court held that any party who does not give consideration to whether liability (or other discrete issues) could be determined as a preliminary issue (or if the issue is raised by another party does not give that party's reasoning due consideration) is failing to further the overriding objective and may be liable to criticism by the Court and potentially face adverse costs consequences.

The result of the case progressing as a full trial of all issues in the High Court was wasted costs, disproportionate use of a High Court Judge and Court resources, and an inability for witnesses to easily attend trial.

CASE UPDATES

Anonymity and Reporting Restriction Orders

PMC (a child) v A Local Health Board
[2025] EWCA Civ 176

In the December 2024 edition of the Dolmans' Insurance Bulletin, we reported on the first instance decision in this clinical negligence case in which the Court was required to consider an Application for the Claimant ('C') to be anonymised. The Application was refused and the Judge raised issues with the wording of the standard form, PF10, used for making such orders and the Court of Appeal's decision in *JX MX v Dartford & Gravesham NHS Trust [2015].* C was given permission to appeal.

The Court of Appeal has adjourned the hearing of the appeal to early summer pending the outcome of the Supreme Court's decision in *Abbasi v Newcastle Upon Tyne NHS Trust & Others [2023]*, which may have some bearing on the issues to be decided.

Given the uncertainty to the proper approach to anonymity orders caused by the first instance decision, the Court of Appeal was asked to give a judgment explaining the current position, pending any appeal decision. The Court of Appeal stated that whilst it did not express any view on the merits of the first instance Judge's critique of PF10 '*for the sake of good order, it may be best for practitioners and judges to continue to use that form for the time being*.' The Court also pointed out that first instance Judges remain bound by the decision in *JX MX* until that decision is either departed from by the Court of Appeal or overruled by the Supreme Court.

Costs - Disapplication of QOCS

BB & Others v Khayyat & Others
[2025] EWHC 443 (KB)

This case involved multiple Claimants against a number of Defendants. The Claimants alleged various damages, including personal injuries and property loss. The litigation included complex jurisdictional challenges. The claims by some of the Claimants (who brought an action for personal injury) were struck out on the basis that they were an abuse of process. The remaining Claimants (who did not bring a claim for personal injury) discontinued their action.

The primary legal issues revolved around the application of QOCS protection and the enforceability of costs orders. The "discontinuing Claimants" sought an order that they would not face the normal costs order on discontinuance. The Court analysed the application of CPR 44, particularly focussing on whether QOCS protection applied to Claimants without personal injury claims and the implications of mixed claims within multi-party proceedings.

CASE UPDATES

Held

- The "discontinuing Claimants" were liable for costs, including those related to jurisdictional challenges, and ordered interim payments, dismissing the Claimants' argument that no interim payments should be made because the Court had a discretion to grant them QOCS protection against the enforcement of the costs order against them pursuant to CPR 44.16(2)(b).

- The Court found no basis for QOCS protection for the Claimants without personal injury claims, emphasising the need to focus on individual claims rather than proceedings as a whole. The "discontinuing Claimants" did not bring an action for personal injury. The fact that some of the Claimants had brought such an action did not mean that the non-personal injury Claimants could argue they could have QOCS protection. If the claim(s) of the individual claimant in question do not include a claim for damages for personal injuries there is no QOCS protection: *Brown v Commissioner of Police of the Metropolis [2019] EWCA Civ 1724*; *Achille v Lawn Tennis Association Services Ltd [2022] EWCA Civ 1407*; and *Wagenarr v Weekend Travel Ltd [2014] EWCA Civ 1105*.

- A claim will only be a 'mixed claim' where the claimant in question is claiming both damages for personal injury (including the financial consequences thereof) and damages for loss which are consequent upon the incident but not the injury. There was nothing in the "discontinuing Claimants" pleaded case which provided any basis to infer or to imply that any of the "discontinuing Claimants" must have suffered physical or psychiatric injury as a result of the pleaded events and/or were, therefore, to be treated as if they were making claims for damages for personal injury. Accordingly, there was no basis for the "discontinuing Claimants" to have QOCS protection, whether under CPR.44.16(2)(b) or otherwise.

- The actions of the Claimants who had brought a claim for personal injury damages had been struck out as an abuse of process. This meant that they did not have QOCS protection. Pursuant to CPR 44.15(b), orders for costs made against a claimant may be enforced to the full extent of such orders without the permission of the court where the proceedings have been struck out on the grounds that the proceedings are an abuse of process. The 'proceedings' in CPR 44.15 has the same meaning as in CPR 44.13, namely all the claims made by a claimant against a single defendant when one such claim is a claim for personal injury: *Achille*.

CASE UPDATES

Costs - Refusal of Mediation

Assensus Limited v Wirsol Energy Limited
[2025] EWHC 503 (KB)

The Claimant's ('C') claims against the Defendant ('D') failed, however C submitted that D ought to receive only 70% of its costs as D had rejected mediation.

The Judge noted this case was not unduly complex and the parties' positions were polarised. C claimed entitlement to a bonus of circa £2.5 million. D argued there was no contractual or other entitlement to such a bonus. Whilst D had not accepted invitations to mediate, this was not a case where D had made no attempts at settlement. D had made a Part 36 offer of £100,000 in November 2022. The issue was whether D's conduct was unreasonable. Making, and then standing by, a reasonable offer was patently not unreasonable conduct in the light of the ultimate judgment.

Whilst the costs of ADR would not have been disproportionate or caused prejudicial delays, in light of both sides' offers on the table, in which there was a significant gap, the Judge considered it unlikely that ADR would have been successful. It was improbable that D would have increased its offer (a position that was ultimately vindicated) and it was plain that C would not have accepted it. In circumstances where the prospect of settlement at mediation was '*vanishingly small*', the decision not to incur costs in mediating was not unreasonable. Accordingly, the absence of a mediation did not justify any reduction in D's costs.

Psychiatric Injury - Secondary Victim - Proximity

Young v Downey
[2025] EWCA Civ 177

The Claimant's father was a soldier who was killed in the Hyde Park bombing in 1982, for which the IRA claimed responsibility. The Claimant ('C') was 4½ years old at the time and in the barracks nursery. C saw her father leave the barracks, heard the explosion and saw other soldiers return covered with blood and embedded with nails. She said to her mother '*daddy should be coming now*' but recalls that he did not. The Defendant ('D') was arrested in connection with the explosion in 2013 and charged with murder, but the prosecution could not be concluded. C brought a claim for damages against D claiming personal injury, aggravated and exemplary damages for her own psychiatric injury and under the Fatal Accidents Act 1976 for loss of dependency and on behalf of her father's estate.

CASE UPDATES

C relied on psychiatric evidence from Dr Cooling. In his evidence, Dr Cooling said C would have appreciated she was seeing something unusual, frightening and challenging. Saying to her mother that daddy should be coming now was the child seeking reassurance about her father, which was not forthcoming. Dr Cooling opined that C had developed PTSD, enduring personality change, recurrent depressive disorder and childhood attachment issues as a result of witnessing the circumstances and direct aftermath of the bombing.

At first instance, the Judge rejected C's claim for damages for psychiatric injury, holding that she could not demonstrate an essential ingredient in her claim – i.e. that she 'appreciated' her father had been, or might have been, involved in the explosion. The Judge rejected Dr Cooling's interpretation of C's words and his evidence that C could be expected to have associated the noise of the explosion and the sight of the other soldiers covered in blood with danger to, or fear for, her father. The Judge did not consider a 4 year old would have appreciated her father was in danger without witnessing herself a trauma being inflicted on him and considered C was in no different a position to any other child in the nursery that day who heard the explosion or saw the aftermath. The Judge concluded that the identification of the loved one as the primary victim was an essential element and, in this case, there was never, at the relevant time, any recognition by C of her father as the primary victim. C appealed.

The Court of Appeal found that the Judge had been wrong to introduce a new and separate requirement of 'appreciation' beyond the control mechanisms set out in previous cases to identify those who are sufficiently proximate to recover damages for psychiatric injury resulting from witnessing an incident or its aftermath (recently summarised in *Paul v Wolverhampton NHS Trust [2024]*) as the existing control mechanisms were sufficient. Those control mechanisms require that the injury to the secondary victim must arise from witnessing the harm or danger to the primary victim so, if the secondary victim did not witness the harm or danger in the sense that they had no understanding of what was going on, the duty cannot arise. If the facts were as the Judge found, then there was no sufficient proximity as C's injury would not have arisen from witnessing the harm or danger to her father. The issue in the appeal was, therefore, a factual, rather than a legal, one.

The Court of Appeal concluded that the Judge had impermissibly allowed his own inexpert opinion about the mental capabilities of a 4½ year old child to influence his evaluation of Dr Cooling's evidence. The Judge should not have allowed his own opinions to override Dr Cooling's clearly reasoned expert evidence. The Judge ought to have accepted Dr Cooling's evidence and held that C had associated what she witnessed was danger to her father and that her psychiatric injuries were caused by the events that she witnessed. Had he done so, the Judge ought to have held that C had established a relationship of proximity because her psychiatric injury arose from witnessing events which she feared might have put her father in danger. Appeal allowed.

For further information on any of the above cases updates, please contact:

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- Display Screen Regulations – duties on employers
- Employers' liability update
- Employers' liability claims – investigation for managers and supervisors
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- Flooding and drainage – duties and powers of Highway Authorities for drainage and flooding under the Highways Act 1980. Consideration of case law relating to the civil liabilities of the Highway Authority in respect of highway waters
- Highways training
- Housing disrepair claims
- Industrial disease for Defendants
- The Jackson Reforms (to include : costs budgeting; disclosure of funding arrangements; disclosure of medical records; non party costs orders; part 36/Calderbank offers; qualified one way costs shifting (QWOCS); strikeout/fundamental dishonesty/fraud; 10% increase in General Damages)
- Liability of Local Education Authority for accidents involving children
- Ministry of Justice reforms
- Pre-action protocol in relation to occupational disease claims – overview and tactics
- Public liability claims update

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