

College of Optometrists and Optical Confederation Submission to the Transport Committee Inquiry into the work of the DVLA and the DSA

Summary

We welcome the opportunity to comment on the work of the Driving and Vehicle Licensing Authority (DVLA).

In particular, we would like to focus on the role we believe the DVLA has in making sure all drivers are aware of the importance of good vision.

We believe that drivers are currently provided with insufficient information about vision, or the steps they need to take when a problem occurs. Under the current system, drivers are required to self report when they realise their vision fails to meet the legal standard. The impetus therefore lies with the driver to not only be aware of the current standard (surveys have shown that the vast majority do not), but also to realise when they do not meet it. As changes in eyesight can occur gradually over time, it may not be immediately noticeable that there is a problem.

As the DVLA is in regular contact with the driving population, regarding both tax disc and licence renewal, we believe this body is well placed to disseminate information about the importance of driving with good vision.

We are also seriously concerned that the current screening of drivers' vision, i.e. the number plate test taken during the practical driving test, is not adequate. The number plate test does not produce consistent results and can be affected by variable, environmental conditions such as light and weather. It has been in place since the 1930s and is therefore outdated – it has remained unchanged despite increased speed and numbers of vehicles on the roads, as well as the larger number of older drivers.

We believe this should be replaced by an assessment of visual acuity in a controlled environment, performed by a healthcare professional, for example using a letter chart (Snellen or equivalent). This would not only produce consistent results, but also an opportunity to provide advice for those who do not initially meet the standard. We should make it clear that such a visual acuity assessment would not have to be conducted by an optometrist, merely by an appropriately qualified healthcare professional.

1 Information about driving with good vision

1.1 At present, the legal eyesight requirement for driving is simply to be able to read a number plate at a distance of 20.5 metres (20 metres for those with a narrower font). Drivers are required to undertake this check, wearing glasses or contact lenses if necessary, before taking their practical driving test. Drivers have three attempts to read the number plate correctly. Thereafter, the responsibility is on the driver to self report to the DVLA if they believe their vision does not meet this requirement. A driver is not legally required to state that their vision is adequate until they reach the age of 70. From this age, drivers receive a licence renewal form, which requires them to state they are fit

to drive, every three years. Currently it is only vocational drivers who are required to have their vision checked on a regular basis – when they renew their licence.

1.2 However, surveys indicate that there is widespread ignorance of the safe levels of visual acuity among the general driving population. Many drivers are simply unaware of the current vision standards, outlined above, and the legal implications of driving with poor vision. Even when drivers are aware they have poor vision, they are often reluctant to admit that they fail to meet the standard. It has been shown that less than 10% of drivers are able to recall accurately the required number plate test distance to enable them to self-assess and that up to 40% of drivers would underestimate the required distance, making the task easier.¹²

1.3 Given this background, it is not acceptable for the DVLA to rely on self-assessment by drivers of their visual function when renewing their licence. If they suffer from a problem with their vision, some drivers will not go to have this checked out for fear that they will lose their driving licence. In many such cases, the problem can be easily rectified. We feel the best way to address these issues is by regular assessment of vision tied to licence renewal. We strongly believe that peripheral vision (visual fields), i.e. side vision, should be assessed alongside visual acuity (distance vision) for older drivers.

1.4 In order to reinforce the importance of always driving with good vision at all times, we would recommend that the DVLA includes a clear reminder to drivers when they are renewing their tax disc (online or in paper format) or their licence, that if they have any doubts about their vision when driving, especially in poor light conditions, then they should go to have their vision checked. The importance of always wearing their vision correction for driving when it has been prescribed for this purpose should also be emphasised.

1.5 We are aware that the UK has a good record of improving road safety and, for this reason, the DVLA and the Department for Transport may feel that the current system is more than adequate. However, there are a number of problems with relying on the UK accident statistics to inform policy, mainly because vision is not measured as a potential or contributory cause to accidents on UK roads. Statistical data is generally not recorded as there is usually a more pressing need to attend to the injured or clear the road at a site of an accident. Gross problems with vision where the driver falls substantially below the visual requirements tend only to be uncovered at a later point in the investigation and we have seen examples in the past year where this is only uncovered by chance.³ Given these problems with the data and the rarity of visual acuity or visual fields being assessed by an accident investigator, there is no consistent mechanism to uncover those with inadequate vision that are involved in an accident.

1.6 The Optical Confederation strongly believes that the DVLA (and the Department for Transport) has adopted an overly relaxed approach to the importance of good vision for

¹ Taylor SP. Accuracy of recall of the legal number plate testing distance by UK drivers. *Ophthal Physiol Opt* 1997; 17: 473-477

² Pointer JS. Poor recognition of the UK minimum driving vision standard by motorists attending optometric practice. *Ophthal Physiol Opt* 2007; 27: 238-244

³ For example, *Daily Mail* 12 April 2010, Virtually blind driver jailed for killing pedestrian he could not see

safe driving. It would be both sensible and proportionate to assess all drivers' visual acuity, and visual fields for older drivers, when renewing their licence. Furthermore, there should be a requirement that documented evidence of this is submitted when renewing a licence. The cost of this type of assessment would be modest compared to the overall cost of motoring (and when taking into consideration the large number of drivers who already have regular eye tests) and would only fall on renewal. We also feel that given the high and rising cost of accidents, there would be an offsetting saving if it resulted in fewer accidents on the UK's roads.

2. About us

2.1 The College of Optometrists is the Professional, Scientific and Examining Body for Optometry in the UK, working for the public benefit.

2.2 The Optical Confederation represents the 12,000 optometrists, the 6,000 dispensing opticians and 7,000 optical businesses in the UK, who provide high quality and accessible eye care services to the whole population. The Confederation is a coalition of five optical representative bodies: the Association of British Dispensing Opticians (ABDO), the Association of Contact Lens Manufacturers (ACLM), the Association of Optometrists (AOP), the Federation of Manufacturing Opticians (FMO) and the Federation of Ophthalmic and Dispensing Opticians (FODO). As a Confederation, we work with others to improve eye health for the public good.