

Optical Confederation Submission to the Transport Select Committee Inquiry into the Government's Strategic Framework for Road Safety

Summary

We welcome the opportunity to comment on the Government's Strategic Framework for Road Safety.

We are very concerned that the current screening of drivers' vision in the UK, i.e. the number plate test taken during the practical driving test, is inadequate. We are also concerned about the lack of any further assessment of vision throughout the driving career (with the exception of self-declaration at the age of 70). The numbers of licences revoked for poor eyesight (a mere 4,000 in 2010¹) does not nearly equate to the 1.8 million people in the UK estimated to have vision below the driving standard of 6/12 (which does not include those with visual field problems). Moreover, with the ageing population and other changes to the demographic profile of the population, the number of people with vision below the driving standard will increase to 4 million by 2050 in the UK².

There is currently a legislative opportunity with the implementation of the EU Directives on Driving Licences (2006/126/EC and 2009/113/EC) to not only strengthen the UK system, but also to enhance the relationship between the Government's strategy and EU road safety initiatives.

In addition to this, a recent European Parliament Own Initiative Report³ called for concerted action to reduce the 35,000 deaths on European roads costing €130 billion annually. Among its recommendations, the Report recommends for all car and motorcycle drivers to have an 'eye test' every ten years, and every five years over the age of 65. We would suggest that this be included in the Government's final Framework for Road Safety.

We feel that vision stands out as singularly important since changes to vision can go unnoticed by drivers, many delay acting on such a change, and eye conditions such as glaucoma can go unnoticed in the early stages. We have attached our more detailed response to the DVLA consultation on the eyesight requirements from earlier this year, which includes supporting evidence and proposals for a better system of driver vision screening. We have reproduced the key themes below for ease of reference.

¹ Those whose licence was revoked totalled 1,597 in 2006 but the figure rose to 4,009 last year, according to figures obtained by the Co-operative Motor Group following a Freedom of Information request to the DVLA.

² Access Economics (2009) for RNIB *Future Sight Loss UK (1)*

³ <http://www.europarl.europa.eu/sides/getDoc.do?type=REPORT&mode=XML&reference=A7-2011-0264&language=EN>

Inadequacies of the number plate test

1. The number plate test fails to produce consistent results that are in line with the European visual acuity standard of 6/12. Its accuracy and reliability has been questioned by a number of scientific publications. It has also remained unchanged since the 1930s despite increased speed and numbers of vehicles on the roads, as well as rising numbers of drivers at risk of sight loss.

Self reporting

2. In its Strategic Framework for Road Safety, the Government recognises that 'drivers and riders are expected to regularly consider their fitness to drive such as their eyesight' which is welcome⁴. 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 but also to realise when they do not meet it, and to act to resolve any underlying problem with their vision. 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^{5,6}. A recent survey by insurance group esure found that one in twelve drivers cannot read a number plate from 20 metres, which demonstrates yet again that drivers are not regularly checking their vision⁷. As changes in eyesight can occur gradually over time, it may not be immediately noticeable that there is a problem. To resolve these problems, all drivers should have an assessment of vision as part of licence renewal.

Way Forward

3. We believe that a certified assessment of visual acuity, and where necessary visual fields, in a controlled environment, performed by a healthcare professional, should be performed in advance of issuing a provisional driving licence and as part of licence renewal. This would not only ensure that drivers meet the current standard when they renew their licence, it would present an opportunity to provide advice on vision and driving e.g. at night time when many drivers report problems. We should make it clear that such a visual acuity assessment would not have to be

⁴ Point 3.7, Page 30, *Strategic Framework for Road Safety* Department for Transport May 2011

⁵ Taylor, SP (1997) Accuracy of recall of the legal number plate testing distance by UK drivers, *Ophthalmic and Physiological Optics* 17 pp473-477

⁶ Pointer, JS (2007) Poor recognition of the UK minimum driving vision standard by motorists attending optometric practice, *Ophthl. & Physiol* 27 pp238-244

⁷ esure used the independent online research company FlyResearch who surveyed 1,025 motorists from across the UK between 25 and 26 October 2011.

conducted by an optometrist, merely by an appropriately qualified healthcare professional.

4. While this would carry a modest cost for motorists, we strongly believe there would be offsetting benefits which would reduce road crashes and uncover undetected avoidable sight loss. According to RNIB 50% of sight loss is avoidable if detected early. Sight loss has a profound impact on quality of life and the costs associated with it are projected to grow to £7.64 billion by 2013². Uncovering avoidable sight loss by assessing drivers' vision at licence renewal would help to reduce these costs to the public purse and society.

Role of Industry and Voluntary Sector

5. With respect to vision, we agree that both industry and the voluntary sector have an important role to play. There is already a number of awareness raising initiatives to highlight the importance of always driving with good vision^{8,9}. While playing an important role, these initiatives can only go so far, and must be reinforced by regular assessments of vision as part of licence renewal.

Information produced by DVLA, Direct Gov and Department of Transport

6. As the Transport Committee will be aware, Government and agency websites are an ideal opportunity to present clear and unambiguous information to motorists. With respect to vision, the information available on Government websites is of poor quality and often hidden. We have several examples of this that we can share with the Committee upon request. This should be replaced with clear statements about the importance of good vision to drive safely. Alongside this should sit a recommendation for regular sight tests, in particular if a driver is at risk of the main causes of visual impairment in the UK (cataract, diabetes, glaucoma, macular degeneration or even uncorrected refractive error). Furthermore, drivers should be advised that if they have any doubts about their vision, they should attend immediately for a sight test.

Public health outcomes

7. We support the Government's proposal to include an indicator in the public health outcomes framework to monitor the number of casualties killed and seriously injured on English roads¹⁰.

⁸ International Glaucoma Association *The Eyeway Code* <http://www.glaucoma-association.com/can-u-c-2-drive-campaign/download-the-eyeway-code.html>

⁹ RSA *Are you fit to drive* <http://news.rsagroup.com/pressrelease/view/549>

¹⁰ Point 3.10, Page 31, *Strategic Framework for Road Safety* Department for Transport May 2011

Conclusion

8. We would urge the Transport Committee to closely examine why vision is not central to the Government's Strategic Framework for Road Safety. We feel that this is an area that has received inadequate attention to date and one with scope to take concrete actions that would improve road safety. We would be grateful if the Transport Committee would recommend an additional Action to the Plan contained in Annex A, based on the proposal below:

Measure	Description	Action	Expected start date	Dependencies
Introduce a certified assessment of vision before issuing a provisional licence and as part of licence renewal	All drivers should have an assessment (performed by a health care professional) to determine whether they meet the minimum visual standards to drive safely.	Include in the implementation of EC Directive 2009/113/EC	Immediate (early 2012)	

About us

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.