

ANNEX B: Reply Form

EXTENDING THE VALIDITY PERIOD OF MEDICALLY RESTRICTED DRIVING LICENCES

Your Personal Details

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The Optical Confederation represents the 12,000 optometrists, 6,000 dispensing opticians, 7,000 optical businesses and 45,000 ancillary staff 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.

Questions

Extended period medical licences

1. Do you agree with the proposal to increase the validity period for certain medically restricted driving licences?

We have several concerns with the proposal as there have been a number of well documented cases recently of individuals with vision impairment who have continued to drive despite medical advice, and subsequently tragically killed pedestrians or other road users.

Some 90% of sensory information when driving comes from vision, which makes eye conditions uniquely important for road safety. Based on the information presented in the consultation document, we would not wish to see this proposal extended to any drivers with vision impairment (including glaucoma or diabetic retinopathy). The maximum validity period for Group 1 drivers with medically restricted licences should continue to be three years.

As the DVLA will recall, the Optical Confederation has called for systematic checks on every driver's eyesight for many years, due to concerns that many eye conditions are without symptoms and cause gradual deterioration in vision, which can go unnoticed by the driver for many years. A recent study has demonstrated once more the links between the ageing population and eye health: greater numbers of older drivers mean

more problems with vision among the driving population, highlighting that vision testing of drivers is an important road safety issue and should include a range of assessments of visual condition including acuity, visual fields and contrast sensitivity.¹

This proposal relates to those who have already notified the DVLA of a concern, which we agree are likely to be responsible drivers, however fear of losing their licence might cause a driver to delay returning for professional assessment and advice, which could delay access to timely treatment and increases their risk on the roads. Under the current system, a driver with a medical restricted licence due to an eye condition must return for a follow up assessment, which we believe is proportionate and fair.

We also disagree with the underlying assumption that the DVLA can rely on healthcare professionals always discussing fitness to drive with their patients. This has been shown not to be the case in research commissioned by the Department of Transport, even when the professionals were prompted to do so.²

We also understand that the DVLA does not collate aggregate statistical data relating to the type and nature of notified eye conditions, which makes it difficult to generalise about a particular eye condition. This is particularly important in the case of glaucoma, which is a family of conditions, and any decision about a patient's suitability for driving must be taken on individual characteristics such as the type or extent of visual field loss, the treatment the patient is on, and its prognosis.

The rate of progression of many ocular conditions such as cataract and age related macular degeneration are variable and unpredictable and failure to require re-assessment at regular (brief) intervals is unlikely to improve road safety particularly with an aging population of drivers. These conditions are common in an aging population, and often present alongside conditions such as glaucoma.

For other non-visual conditions which can affect driving, we believe that the patient's health care practitioner should have input to the choice of when the patient should return for a follow up assessment and the length of validity of a license. This should be a forced choice for the healthcare practitioner to complete, based on the patient's individual clinical characteristics, on the relevant medical report form (which is then returned to the DVLA).

While we accept that there are administrative costs and practical difficulties with three year renewals, we do not believe that shortcuts should be taken with eye care conditions that are likely to increase the risks on our roads. We would rather see every step taken to deal with those administrative bottlenecks in the first instance (for example, by allowing electronic submissions), rather than try to reduce the numbers returning for follow up assessments.

¹ Desapriya E et Al (2014) Vision screening of older drivers for preventing road traffic injuries and fatalities, *Cochrane Database of Systematic Reviews*, Issue 2, Art. No: CD006252

² Hawley, C (2010) Road Safety Research Report No. 91 The Attitudes of Health Professionals to Giving Advice on Fitness to Drive, <http://assets.dft.gov.uk/publications/pgr-roadsafety-research-rsrr-theme6-report91-pdf/report91.pdf>

2. Do you foresee any problems if the maximum validity period for medically restricted driving licences was extended for up to 10 years? If so, what are they?

Yes. As noted above, we do not believe that the maximum validity period for drivers with eye conditions should change from the current three years. The current system is a clear and regular reminder to these drivers that they must have their vision checked regularly and they should only drive with adequate vision.

If this period were extended, we believe this would increase the risk on the roads.

Ten years is a very long time and an individual's vision can change significantly within that timeframe. Most of these individuals with visual conditions will be in high risk categories and therefore are at greater risk of secondary or other conditions developing. It is therefore in the driver's own interest, and the public's interest, that their visual capacity for driving is assessed regularly (i.e., at three year intervals or less as determined by their healthcare practitioner).

How to respond:

- By completing an online response form at:
<https://www.surveymonkey.com/s/BSTNKDS>
- By post to Consultations, Strategy and Policy Directorate, D16, DVLA, Longview Road, SWANSEA, SA6 7JL

THE CLOSING DATE FOR RESPONSES IS 3 APRIL 2014