

House of Commons Transport Committee:

Inquiry into road traffic law enforcement

Response from the Optical Confederation

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 Optical Confederation also represents manufacturers, distributors and importers. As a Confederation we work with others to improve eye health for the public good.

The Optical Confederation welcomes the Transport Committee's inquiry. We would like to draw to the attention of the Committee the importance of drivers' vision in ensuring and improving road safety, and highlight the need for better monitoring by police of the vision of a driver involved in a road traffic accident or stopped for careless or reckless driving.

The current legal requirement for vision and driving (for a Class 1 licence) in the UK is the basic number plate test (i.e. that the candidate can read a car number plate at a distance of 20m) and an ability to achieve a visual acuity of 6/12 Snellen. If a driver requires spectacles or contact lenses to meet this test, then they are required to wear them for driving. A driver is also required to notify the DVLA if their vision changes and they are advised by an optometrist or a medical practitioner that they should no longer drive.

We have three concerns with regard to the current situation in driving and vision in the UK.

- Firstly, the number plate test undertaken as part of the driving test is inadequate and by requiring a driver to pass the number plate test and also meet the EU vision standard, confusion may be created for the driver.
- Secondly, that once a person has been issued with a driving licence there is no further requirement for a sight test or declaration that vision meets the standard until they reach the age of 70.
- That there is virtually no data in the UK about the role that poor vision may play in road safety because although vision is one of the parameters that the police may record as being an issue in road traffic accidents, or when a driver is stopped for careless or reckless driving, the assessment is not routinely made.

The Optical Confederation, along with others, has for a number of years argued for the need for the UK to comply with the European Driving Licence Directive (Directive 2009/113), which should have been implemented since January 2013, and introduce standardised vision testing as part of the driving test. Whilst the directive provides flexibility to Member States as regards the method they apply to ensure adequate visual acuity, licence plate testing does not measure visual acuity accurately and number plate tests are not carried out

under controlled conditions. The UK government has however argued that the number plate test is sufficient, and cited the fact that road traffic accident rates are lower in the UK than in many other parts of Europe, and that there is no evidence to suggest that poor vision is a significant factor in road traffic accidents.

We do not dispute that the accident rate in the UK is lower than in many other countries but we do not believe that is a reason for being complacent or for not taking all reasonable steps to reduce the accident rate. That all drivers should be able to meet the vision standards specified in the EU directive – wearing spectacles or contact lenses if necessary – does not seem to us to be an unreasonable requirement and one that should be better policed as failure to comply with the requirement is a criminal offence.

From information available it appears to be rare for a driver's vision to be taken into account following an accident or when a driver is stopped for reckless driving – and it seems that there is no routine requirement to check or record whether vision was a factor in an accident. This failure to take account of and record a potentially critical factor has created a chicken and egg situation. While common sense would suggest that poor vision – or the failure of a driver to wear their spectacles or contact lenses when required by law to do so – is likely to be a factor in a proportion of accidents, the failure to take it into account means that it is very hard to calculate how significant this problem is, or to take action to address it. Worse still, this lack of data has been used to justify not taking any action at all to ensure that those who drive meet proper standards of good vision.

In 2013 the police were given new powers – Cassie's law - which enabled them to revoke a driver's licence within a matter of hours where they had serious concerns that his or her poor vision made them a danger. This change was introduced following the death of Cassie McCord in 2011, who died from injuries sustained when motorist Colin Horsfall lost control of his car in Colchester, Essex. It later emerged that, three days before the accident, Essex police had advised 87-year-old Mr Horsfall not to drive after he was involved in a minor collision and subsequently failed a sight test. However, Mr Horsfall continued to drive and at the time police had no powers immediately to suspend his licence. Under the new law, when a police officer believes that the safety of other road users would be put at risk if a driver with insufficient eye sight remains on the road, they can ask for the licence to be urgently revoked. There are three levels of revocation under the new system: immediate, within 48 hours and postal.

A freedom of information request this summer showed that, in the 18 months since the law was changed, the police had used this power 631 times to request that a licence be revoked, and the request had been granted 609 times. Given that this is a new law, and that it can only be used when the police have stopped someone and they have serious concerns about that posing a risk if they continue to drive, it would suggest that there are many more drivers whose vision is poor and who are a potential risk to themselves, pedestrians and other road users.

We would therefore ask the Committee to weigh the evidence and recommend that:

- the UK standardises the vision standards for driving and uses only the Snellen requirement of the EU directive

- drivers, when their licence is renewed every 10 years (or more frequently for older drivers), should have confirmation that they meet the vision requirements and whether or not an optical correction is required to meet the standard
- all road traffic accident reports should include, as a matter of routine, whether poor vision was a factor

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