



Introducing mandatory eyesight testing for older drivers – Consultation Response

Responsibility for Notifying DVLA (diagnosis)

Who do you think should be responsible for notifying the DVLA when a licence holder is diagnosed with a medical condition that may affect their ability to meet the vision standards for driving?

The driver, eye health professional, and other healthcare professionals

Mandatory Eyesight Testing

Do you agree or disagree mandatory eyesight testing should be introduced for older drivers?

Agree

Why?

Meeting sufficient vision requirements is central to the task of driving for all drivers. We support the Association of Optometrists and The College of Optometrists position statement recommendation that eyesight testing should be required at driver license initial application and at every renewal (every 10 years and then every three years from age 70). This would align with age-related eye conditions and deterioration in visual function.

Evidence suggests that older drivers (generally defined as drivers aged 70 years and above) are at greater risk of fatal collision compared to younger aged drivers, largely due to increased fragility.

The proportion of collisions where someone is Killed or Seriously Injured is increasing with an older driver (70+) whereas it is decreasing across other age groups. The most common road safety factor attributed to fatal and serious collisions involving an older driver was 'ineffective observation by the driver' which was recorded in 33% of cases involving an older driver compared with 23% other drivers. The number of people over age 65 in the population is projected to keep growing, so the number of people affected by this increased risk on roads will keep growing. A recent umbrella review conducted by Public Health Scotland (PHS) concluded that evidence suggests that using population-wide laws and regulations were effective.

Conversely, measures focused only on educating road users of risks or that depend on road users to self-enforce did not tend to be supported by evidence. This suggests population-wide laws and enforcement should be prioritised, with education and awareness raising being used only as supportive measures. In relation to eyesight testing, this suggests that mandatory testing for license renewal should be prioritised over driver self-declaration for eyesight standards.

Age Threshold for Testing

Do you agree or disagree that 70 years is the appropriate age for mandatory eyesight testing to start?

Disagree

Why?

Meeting sufficient vision requirements is central to the task of driving for all drivers. We support the Association of Optometrists and The College of Optometrists position statement recommendation that eyesight testing should be required at driver license initial application and at every renewal (every 10 years and then every three years from age 70). This would align with age-related eye conditions and deterioration in visual function. Systematic reviews identified from a recent umbrella review conducted by Public Health Scotland did not find sufficient primary studies to suggest the age at which age-related licensing requirements should begin for older drivers. However other evidence suggests that prevalence of visual impairments and eye disease begin to increase more sharply around age 65. In addition, age-related vision impairments (and comorbidities that contribute e.g. diabetes or high blood pressure) can emerge from as early as age 40. Therefore, eyesight testing requirements should be introduced earlier than 70 years of age to ensure safe road use

Frequency of Testing

In your view how often should older drivers be required to have a mandatory eyesight test?

Every 3 years

Why do you think this frequency is correct?

We support the Association of Optometrists and The College of Optometrists position statement recommendation that eyesight testing is conducted at driver license initial application and at every renewal (every 10 years and then every three years from age 70). This aligns with age-related eye conditions and deterioration in visual function as evidence suggests that prevalence of visual impairments and eye disease begin to increase more sharply around age 65. It also makes sense

administratively to match eyesight testing to the existing requirements for license renewal. Mandating regular eye checks would also have the added benefit of allowing for earlier detection of eye disease and potentially avoidable sight loss.

Increasing Frequency of Testing

In your view should the frequency of mandatory eyesight tests increase as drivers get older?

Yes

At what age, in your view, should the frequency of mandatory eyesight testing be increased?

70 years

Why do you think frequency of mandatory eyesight testing should be increased at this age?

Evidence suggests that prevalence of visual impairments and eye disease begin to increase more sharply around age 65. It also makes sense administratively to match eyesight testing to the existing requirements for license renewal.

Eye Testing

What, in your view, should the mandatory eyesight test cover?

Visual acuity (a measure of the eyes' ability to see sharpness of vision. This is usually measured by reading letters on a chart from a set distance, with glasses or contacts if needed)

Visual field (this is measured using machinery which tests your central and side vision and identifies if you have vision problems)

Identification of a visual condition

Confirmation that drivers meet the legal eyesight standards for driving

Who, in your view, should be responsible for conducting the mandatory eyesight test?

Qualified eye healthcare professional

Who, in your view, should be responsible for notifying the DVLA of the outcome of the mandatory eyesight test?

Both the driver (licence holder) and whoever conducts the test

Outside of any potential mandatory eyesight testing requirements, who do you think should be responsible for notifying the DVLA when a licence holder may no longer meet the vision standards for driving?

Driver (licence holder)
Eye health professional
Other healthcare professional

Final Comments

Any other comments?

The Faculty of Public Health is very pleased that the Government is taking steps to improve road safety. Safety concerns are the prime reason given, especially by women and other vulnerable road users, for reluctance to use active travel or public transport. Ensuring that our streets feel safe enough for people to walk and cycle, either for all or part of their journeys, is essential if we are to improve air quality, reduce carbon emissions and congestion, increase physical activity and improve social connectivity and productivity. We are disappointed, therefore, that the most effective methods to make our roads safer are not included in the consultation.

These are:

- To introduce 20mph speed limits on all roads in built up areas;
- To reduce miles travelled by motorised vehicles, especially private cars, and increase miles travelled by active means and public transport.

We would also note that while we welcome the additional powers being given to local authorities (including regarding pavement parking), there is a need for strong national messaging on safe and considerate driving together with funding for enforcement to support local area implementation. In relation to older people specifically, an important risk not addressed by the current proposals is cognitive function. Nearly 1 million people in the UK live with dementia and half these people are not currently diagnosed. The prevalence of dementia doubles every 5 years after age 70 and 11% of 80 - 84 year olds have dementia. This suggests that screening for cognitive deficits should be included as part of license renewal.

Besley et al Dementia in the UK [https://www.ohe.org/wp-](https://www.ohe.org/wp-content/uploads/2023/07/OHE-ReportEstimating-the-Potential-Future.pdf)

[content/uploads/2023/07/OHE-ReportEstimating-the-Potential-Future.pdf](https://www.ohe.org/wp-content/uploads/2023/07/OHE-ReportEstimating-the-Potential-Future.pdf)

National Institute for Health and Care Excellence. Dementia: how common is it?

<https://cks.nice.org.uk/topics/dementia/background-information/prevalence/>