



**RESPONSE TO  
THE DRIVER AND VEHICLE LICENSING AGENCY'S  
CONSULTATION PAPER**

**"EXTENDING THE VALIDITY PERIOD OF MEDICALLY RESTRICTED  
LICENCES"**

**3 APRIL 2014**

## INTRODUCTION

This is the response of the Royal Society for the Prevention of Accidents (RoSPA) to the Driver and vehicle Licensing Agency's consultation paper, "Extending the Validity Period of Medically Restricted Driving Licences". RoSPA thanks the DVLA for the opportunity to comment on the proposals.

The law allows the DVLA to issue a restricted period driving licence to a driver on medical grounds for one, two or three years. It does not allow the DVLA to issue a restricted period driving licence for longer than three years. In 2011/12, the DVLA made licensing decisions on 675,000 drivers and motorcyclists where a health issue was reported for the first time, or an existing condition needed to be reviewed. This cost an estimated £20 million. Around 43% of the car drivers and motorcyclists were issued a restricted driving licence.

More than three quarters of drivers who re-apply for their licence when their three year licence expires are issued with another licence valid for three years. Therefore, a three yearly review may be more often than necessary for many people whose medical condition is likely to remain stable or change slowly. For these drivers, a longer review period may be more appropriate.

Therefore, the DVLA is proposing to extend the maximum period for driving licences restricted on medical grounds beyond three years, where the medical condition is suitable for a longer period between reviews. Each case would be assessed individually, and the period of the driving licence would depend on expert medical advice about their medical condition(s), and an assessment of overall risk. They would still have an ongoing responsibility to notify the DVLA if their condition changed significantly in the meantime. High-risk cases would continue to be reviewed after one, two or three years.

Group 2 (lorry and bus) drivers are already subject to stricter health standards and must renew their licences every five years after they reach the age of 45, so any medically restricted driving licences would have to be valid for five years or less from the age of 45 onwards.

Extending restricted licences for up to ten years would reduce the DVLA's annual caseload by 10%, and save approximately £1.8m per year. It would enable the DVLA to focus more resources on higher risk cases which need close assessment and review. It should also reduce the burden on individual drivers who do not need to be reviewed every three years, and on the medical practitioners who conduct the assessments.

Analysis by the DVLA in 2011 showed that drivers with the single medical condition of insulin treated Diabetes, Glaucoma, Epilepsy, Parkinson's Disease or Multiple Sclerosis had been issued with at least two, three-year licences and could, therefore, be reliably issued with a single licence valid for longer than three years. Therefore, the DVLA is seeking views on two questions:

1. Do you agree with the proposal to increase the validity period for certain medically restricted driving licences?
2. Do you foresee any problems if the maximum validity period for medically restricted driving licences was extended to up to ten years? If so, what are they?

### **Question 1**

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

#### **RoSPA Response**

Yes, RoSPA agrees with the proposal to increase the validity period for certain medically restricted driving licences, provided that (as stated in the consultation paper) the maximum period is based on:

- an assessment of the overall risk of each particular medical condition changing significantly over time and which medical conditions are suitable for a longer period between reviews.
- an individual medical assessment of each person
- expert medical advice about the length of time each individual's medical condition is likely to remain stable and they are likely to remain medically fit to drive.

However, we are not sure of the strength of the evidence that a particular medical condition (say, diabetes) is likely to be suitable for longer period licences.

### **Question 2**

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

#### **RoSPA Response**

RoSPA believes that there would be some difficulties to be addressed.

The most obvious risk is that a driver who is issued with a restricted licence for a longer period (potentially up to 10 years under this proposal) would not realise, or deliberately decide not to report, that their medical condition has worsened. Although changes in their condition should be identified by their doctor or health professional, if driver fitness is not specifically assessed or discussed during the normal consultation with the driver, the need for a review of their fitness to drive before their licence expires may be missed by the medical professionals.

Also, drivers with medically restricted driving licences valid for up to 10 years may be less likely to think about whether their medical condition is changing in a way that affects their driving.

If these proposals are implemented RoSPA recommends that the DVLA consider how it can raise and sustain awareness among the drivers and medical professionals involved about the need to regularly review the driver's medical condition and fitness to drive, and that the driver has a legal duty to notify the DVLA if their condition changes significantly.

RoSPA thanks the DVLA for the opportunity to comment on the proposals. We have no objection to our response being reproduced or attributed.

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