



**Wales Safer Communities Network response to:
DVLA call for evidence: Driver licensing for people with
medical conditions response.
Closed 22 October 2024
Response submitted via the online survey.**

Questions:

Please note that sections 1-3 were not responded to as part of our response due to the nature of the questions being health or medical related rather than potential links to community safety.

Section 4 – Multiple medical conditions and an ageing population

4a) Are any changes needed to address the growing prevalence of drivers with multiple medical conditions?

Yes, we are concerned that potential additional complications that may be caused by combined medical conditions may be missed if each condition is dealt with in isolation. A single diagnosis may not be possible due to pressures on the health service and each condition and element dealt with correctly but in isolation – but combined they could add to complications for driving.

Section 5 – Medical licensing process and costs

5a) Do you think that the cost associated with medical investigations should be paid by taxpayers and DVLA?

Yes, we think that the cost associated with medical investigations should be funded by taxpayers and DVLA or at least have some form of means testing. Our reasoning for this is that if the individuals are expected to pay for it that for those at a socio-economic disadvantage including those who have other protected characteristics (such as, disability and race) may be unfairly negatively impacted. As this may mean that they either neglect to report a condition when they should, or they do report but are unable to afford the medical investigation and consequently lose their driving licence when someone more affluent in the same position would be able to keep theirs. This could lead to exploitation and other forms of abuse as they may become more isolated and have less opportunities due to limitations in public transport.

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5b) Would it be appropriate for the individual customer to pay for medical investigations in relation to their fitness to drive?

We do not think this is appropriate and could lead to a two tier system for those who can afford it and those who cannot. This is especially concerning at the moment when the cost of living is placing an increasing burden on individual and family finances and an increasing number of people living in poverty of some form. As mentioned in question 5a, if there is a need for some other form of financing then this should only apply to those earning above a certain level as it is important for road safety that people report medical conditions so appropriate consideration and if necessary, actions can be undertaken.

5c) Do you have any knowledge of alternative arrangements for funding medical driver licensing requirements? If so, please describe.

We have no alternative suggestions not mentioned in our answers to questions 5a and 5b.

5d) Do you have any evidence relating to the success of or any problems with these arrangements?

Not applicable

Section 6 – Future thinking

6a) Do you believe that the current medical standards will need to change to take into account advances in in-vehicle technologies? Please give the reason for your answer.

There is the possibility that as technology improves that more self-driving vehicles may enable some form of change, however technology is not at the stage where there is no need for driver input or involvement. For this reason, we do not think it is appropriate at this stage to be making changes until it is known it is safe to do so.

6b) Is there any evidence you would like to provide on how driver licensing could be future-proofed to accommodate advanced in-vehicle technologies?

We have no evidence or comment to make at this time.

6c) Do you believe that the use of automated decision-making would be beneficial for drivers medical casework? Please explain your reasoning.

We think that automated decision-making can have a place where there are simpler diagnosis and conditions and in pulling together all the information that may be needed in order to make a decision. Machine learning can be much faster in identifying research and providing it but should not be relied on as the only source as it is still in its infancy and it is only as good as the information it can access which may lead to incorrect, false or fake information as a result.

6d) Do you think that a person should continue to make the decision on whether to issue or revoke a driving licence? Please explain your reasoning.

A person should review the information and decision or recommendation in all circumstances. If they find fake or false information being used as evidence, then they will need to be able to feed it back into the system. It should also allow any patterns that may start to occur to be identified if certain wording despite conditions being unsafe lead to an unsafe decision or recommendation by a machine. A human making a mistake may impact on one incorrect instance, a machine doing the same could result in multiple due to the difference in process speed and because of the way they build their own memory.