# Vision Australia

# Driving with Significant Vision Loss

**June 2020**

# Position Statement summary

The loss of a driver’s licence following the acquisition of a significant vision loss can be a traumatic and life-changing experience, and can lead to feelings of dependence and inadequacy. Some people respond by continuing to drive, thereby denying or under-estimating the safety risks to themselves and others. People with disability have a clear right to freedom of movement and independent mobility in the community; however, enjoyment of this right does not entitle a person to put themselves and others at risk. Vision Australia’s strong view is that it is an unacceptable risk to the community for a person to drive a motor vehicle on a public road or in a public place if they do not meet minimum visual fitness criteria. Given the life-changing impact of no longer being able to drive independently, it is essential that governments improve the availability of convenient accessible public transport, and that Specialist community services are available to support an individual’s physical and emotional transition.

If you would like this position statement in an alternative format or wish to discuss it with Vision Australia’s Government Relations and and Advocacy team, please contact us:

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# Background

This position statement is founded on principles that are set out in the UN Convention on the Rights of Persons with Disabilities (“the Convention”). The convention is the most complete expression of the human rights enjoyed by people with disability. Australia has signed and ratified the Convention, and hence is bound by the obligations that it establishes. Article 20 Personal Mobility states that:

“Parties shall take effective measures to ensure personal mobility with the greatest possible independence for persons with disabilities”

It is important to bear in mind, however, that the enjoyment of human rights such as those asserted in the Convention does not entitle a person to act in ways that endanger the safety of themselves and others. Being able to drive is a skill that is universally considered to increase independence and freedom of mobility, and to help establish a sense of identity and self-worth. The acquisition of a significant vision loss, and the resulting loss of a driver’s licence, can therefore be an especially challenging, traumatic and life-changing experience with profound emotional and psychological impacts. In an attempt to preserve their sense of independence and identity, some people respond by continuing to drive, and thereby deny or under-estimate the safety risk that they will cause for themselves and others.

Good vision is essential to the safe operation of a motor vehicle. Any marked loss of visual acuity or visual field will diminish a person’s ability to safely manoeuvre a car. People who have significant vision loss may fail to detect another vehicle and/or pedestrians, and they may take appreciably longer to perceive and react to a potentially hazardous situation.[[1]](#footnote-1)

The eligibility criteria that have been developed by the Association of Australian and New Zealand Road Transport and Traffic Authorities (Austroads) are an effective method for assessing fitness to drive. The Austroads criteria state that a private driver’s licence should not be issued to a person with a visual acuity less than 6/12 in their better eye or both eyes or a visual field with a horizontal extent less than 110 degrees within 10 degrees above and below the horizontal midline.[[2]](#endnote-1) However, stricter criteria apply to the issuing of commercial licenses.[[3]](#endnote-2) A conditional licence may be offered to people whose vision is improved through corrective lenses. An ophthalmologist or optometrist may also recommend a conditional licence be granted if a person’s visual acuity or visual fields are just below that required by the standard, but the person is otherwise alert, has normal reaction times and good physical coordination.

The incidence of vision loss is predicated to increase as the population ages, and the risks to the community posed by people who drive despite having a significant loss will therefore increase unless there is a concerted and consistent effort to implement the measures outlined in this position statement.

# Position statement

1. It is in the best interest of all drivers, passengers, pedestrians and other road users that people with significant vision loss do not drive a vehicle on public roads or in public places. Vision Australia supports the drivers licence vision requirement eligibility criteria as set out in Austroads Assessing Fitness to Drive 2012, and it is unacceptable for any person to drive a motor vehicle if they do not meet these minimum visual fitness criteria.
2. All drivers should undertake regular eye checks, particularly if they are at increased risk of deteriorating vision due to factors such as their eye condition or age.
3. To minimise the impact of the loss of a driver’s licence, government and the community must do more to ensure that people who are blind or have low vision have equal, convenient, affordable and independent access to a range of public and private transport options.
4. People who acquire a significant vision loss must have affordable, convenient and timely access to comprehensive counselling about dealing with the emotional and psychological impacts of vision loss in ways that preserve independence and self-worth.
5. Government, professional associations, service providers and the community must work collaboratively to develop and deliver ongoing public awareness campaigns that focus on the dangers of driving with a significant vision loss, as well as on the services available to help minimise the impacts of vision loss on all aspects of life.

## About Vision Australia

Vision Australia is the largest national provider of services to people who are blind or have low vision in Australia. We are formed through the merger of several of Australia’s most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision or have a print disability, and their families.

Vision Australia service delivery areas include: registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment, Assistive/Adaptive Technology training and support,

Seeing Eye Dogs, National Library Services, Early childhood and education services, and Feelix Library for 0-7 year olds, employment services, production of alternate formats, Vision Australia Radio network, and a national partnership with Radio for the Print Handicapped, NSW Spectacles Program and Government Advocacy and Engagement. We also work collaboratively with Government, businesses and the community to eliminate the barriers our clients face in making life choices and including fully exercising their rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 26,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation. Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision as well as they support they require to fully participating in community life.

We have a vibrant Client Reference Group, comprising of people with lived experience who are representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment. Vision Australia also has a Memorandum of Understanding with, and provides funds to, Blind Citizens Australia, to strengthen the voice of the blind community.

Position statement ends.

1. Austroads (2012) Assessing fitness to drive for commercial and private vehicle drivers. Sydney, NSW [↑](#footnote-ref-1)
2. According to the Austroads (2012) guidelines on assessing fitness to drive, the private standards should be applied to:

	* drivers applying for or holding a licence class C (car), R (motorcycle) or LR (light rigid) unless the driver is also applying  for an authority or is already authorised to use the vehicle for carrying public passengers for hire or reward or for carrying  bulk dangerous goods, or, in some jurisdictions, for a driving instructor. [↑](#endnote-ref-1)
3. According to the Austroads (2012) guidelines on assessing fitness to drive, in order to qualify for a commercial license an applicant must have a corrected or uncorrected visual acuity of at least 6/9 in the better eye and at least 6/18 in the worse eye. A commercial license also requires that the driver has a binocular visual field of at least 140 degrees within 10 degrees above and below the horizontal midline. The guidelines stipulate that commercial standards should be applied to:

	* drivers of ‘heavy vehicles’, i.e. those holding or applying for a licence of class MR (medium rigid), HR (heavy rigid), HC (heavy combination) or MC (multiple combination)
	* drivers carrying public passengers for hire or reward (bus drivers, taxi drivers, chauffeurs, drivers of hire cars and small buses, etc.)
	* drivers carrying bulk dangerous goods
	* drivers subject to requirements for Basic or Advanced Fatigue Management under the National Heavy Vehicle Accreditation Standard
	* other driver categories who may also be subject to the commercial vehicle standards as a result of certification requirements of the authorising body or as required by specific industry standards, for example, driving instructors and members of Trucksafe [↑](#endnote-ref-2)