

Consultation on a proposal to allow bus and lorry drivers with diabetes to use glucose monitoring systems

RoSPA's response to DVLA's consultation

Response to DVLA's consultation: Allowing bus and lorry drivers with diabetes to use glucose monitoring systems

Introduction

This is the response of The Royal Society for the Prevention of Accidents (RoSPA) to the DVLA's consultation on a proposal to allow bus and lorry drivers with diabetes to use glucose monitoring systems. We are happy for this response to be reproduced or attributed.

Caitlin Taylor, Road Safety Manager



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Please provide your name, job title and organisation name.

RoSPA response

Caitlin Taylor, Road Safety Manager, Royal Society for the Prevention of Accidents (RoSPA)

Do you agree/disagree with changing the law to allow Group 2 drivers to use CGMS for driving? Please explain your reasons

RoSPA response

We agree with the proposed change to allow Group 2 drivers to use Continuous Glucose Monitoring Systems (CGMS) for driving. CGMS offers significant advantages over traditional finger-prick tests, such as providing real-time monitoring and predictive alerts for hypoglycaemia or hyperglycaemia. These features enhance safety by helping drivers manage their blood glucose levels more effectively while on the road. Additionally, CGMS encourages more frequent monitoring and improves glucose control, which can reduce the risk of dangerous hypoglycaemic events, benefiting both the driver and other road users. The technology is a natural evolution in diabetes management, and its inclusion for Group 2 drivers would modernize the approach to road safety. The CGMS system has the following benefits:

- **Real-Time Monitoring:** CGMS provides continuous glucose readings, allowing drivers to monitor trends in glucose levels, rather than relying on occasional finger-prick tests.
- **Predictive Alerts:** Devices can send alarms when blood sugar levels are approaching unsafe thresholds, enabling timely corrective actions and reducing the risk of hypoglycaemic events while driving.
- **Improved Safety:** Research shows that CGMS can help drivers maintain better glucose control and reduce the time spent in hypoglycaemia, lowering the risk of dangerous episodes on the road.
- **Convenience:** CGMS is less invasive and more user-friendly than finger-prick testing, encouraging more frequent monitoring and better adherence to safety guidelines.
- **Reduced Burden:** Drivers using CGMS may need fewer finger-prick tests throughout the day, making diabetes management less disruptive to their daily routines.

However, our support is conditional on the provision of robust, practical training and support to ensure that all drivers can effectively use the technology. While CGMS offers clear advantages, it is important to acknowledge that prospective trials often involve highly motivated patients, and in real-world settings, there may be challenges¹. These include limited resources for training and the potential overwhelm caused by complex data or algorithms, especially for less motivated individuals¹. Furthermore, issues such as device hassle, skin reactions, or difficulty with adhesion have been cited as reasons for discontinuation¹. Therefore, it is crucial that any rollout of CGMS for drivers includes comprehensive, accessible training that addresses these concerns. This training must focus on simplifying the use of the device, ensuring that drivers can manage and interpret the data with confidence, while also offering ongoing support to overcome any practical issues, such as skin reactions or device comfort. Only with these safeguards in place can we ensure that CGMS truly enhances safety without creating undue burden for drivers.

1. Reddy, N., Verma, N. and Dungan, K., 2023. Monitoring technologies-continuous glucose monitoring, mobile technology, biomarkers of glycaemic control. *Endotext [Internet]*: <https://www.ncbi.nlm.nih.gov/sites/books/NBK279046/>



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Can you identify any unforeseen issues or unintended consequences arising from the proposed change in respects of costs, impacts on business or road safety?

RoSPA response

While CGMS has clear benefits, some unintended consequences could arise, including:

- **Cost Implications:** CGMS devices are more expensive than traditional blood glucose meters. This could place a financial burden on drivers or their employers, especially if the devices are not fully covered by insurance or the NHS. There may also be ongoing costs for sensor replacements and device maintenance.
- **Device Reliability:** CGMS devices, while generally accurate, could malfunction or provide inaccurate readings, which might lead to unsafe driving if not properly maintained. This could potentially compromise road safety.
- **Training Needs:** Drivers will need adequate training on how to use the CGMS effectively and interpret the data. If drivers fail to understand or misinterpret alarms or glucose readings, it could lead to poor decision-making and unsafe driving.
- **International Issues:** Since some countries still require traditional blood glucose testing for Group 2 drivers, UK drivers may face challenges if they drive abroad. This could create confusion about the appropriate method of monitoring glucose levels in foreign jurisdictions. Some countries still require traditional blood glucose tests for Group 2 drivers, which could lead to confusion or non-compliance for UK drivers working abroad.
- **Dependence on Technology:** Over-reliance on alarms and notifications may cause drivers to overlook physical symptoms of hypoglycaemia, which could be dangerous if the device fails or if the driver ignores the alarm.
- **Potential for Misuse:** If drivers misuse or ignore the CGMS readings and alarms, it could still lead to unsafe driving, particularly if the driver misinterprets the device's feedback or fails to act on alerts.

If you are a diabetologist, or an independent Group 2 diabetes assessor, please tell us how many Group 2 drivers you assess on an annual basis

RoSPA response

Not applicable.

If your business is involved in the manufacture and supply of diabetes testing equipment, please tell us if the above proposals will have any impact to your organisation.

RoSPA response

Not applicable.



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Additional Comments

In addition to supporting the use of Continuous Glucose Monitoring Systems (CGMS) for Group 2 drivers, we believe this should be part of a broader conversation about total driver health, particularly given the sedentary nature of driving for work. While CGMS offers significant benefits for managing diabetes, it is essential to recognise that overall driver health—encompassing physical activity, diet, and mental wellbeing—plays a critical role in road safety. The sedentary lifestyle associated with long hours of driving can contribute to a range of health issues, including obesity, cardiovascular disease, and poor metabolic control, which may exacerbate the challenges of managing diabetes. Therefore, alongside the introduction of CGMS, it is important to encourage a holistic approach to health, which includes promoting physical activity, regular health checks, and healthy lifestyle choices for drivers. By integrating these considerations into the conversation, we can support drivers not only in managing their blood glucose levels but also in improving their overall health, leading to better long-term outcomes for both the drivers themselves and road safety.

RoSPA has no further comments to make on the consultation process beyond this, other than to thank the DVLA for the opportunity to comment. We have no objection to our response being reproduced or attributed.

