



13 November 2020

Submission on: Assessing Fitness to Drive

Diabetes Australia welcomes the opportunity to provide a response to the consultation questions issued by the National Transport Commission (NTC) and Austroads in its review of the joint publication *Assessing Fitness to Drive – Commercial and Private Vehicle Drivers (AFTD)*.

Diabetes Australia, along with the Australian Diabetes Society and Australian Diabetes Educators Association participated in the NTC and Austroads diabetes working group as part of the development of the 2016 (amended in 2017) AFTD. Diabetes Australia welcomes the opportunity to continue to be involved in the Diabetes Working Group to assess any changes to the diabetes chapter in the driving guidelines.

Diabetes Australia notes the elements in-scope for this review, as well as those out of scope. This submission has been prepared in the format of the NTC Austroads template.

1. Issue Consideration

In relation to the current guidance and information in the AFTD, Diabetes Australia is only requesting limited changes.

There are some considerations regarding the advice to drivers regarding 'five to drive' which recommends that people with diabetes using glucose lowering medication have a glucose reading of above 5.0mmol/L before they drive.

In recent years, continuous glucose and flash glucose sensing devices have become more widely used in Australia. These devices also provide information about predicted glucose levels, including advising if glucose levels are dropping progressively into the hypoglycaemia range.

Therefore, a single 'five to drive' message may not be appropriate in those cases. Instead, we recommend that if drivers of vehicles are using flash glucose monitoring or continuous glucose monitoring systems, then in addition to ensuring glucose levels are not below 5.0 mmol/L in order to safely drive, they should also promptly treat any continuous glucose levels that are showing downward trends into the hypoglycaemic (low glucose) range, so to prevent hypoglycaemia while driving.

In addition, some of the below references to publications require updating to reflect the most recent versions and advice.

Issue	Part	Section	Page	Details to be addressed	Recommendation	Anticipated effects of recommendation	Supporting information
1	B:3	3.2	59	Publication superseded – GP management of type 2 diabetes 2014-15)	Replace with latest version of this publication dated July 2020.	Health professionals and driver licensing authorities will have access to most recent GP guidelines.	Available on the RACGP website.
2		3.2.1	59	Current statement about advice to drivers is: 'not driving if their blood glucose is at or less than 5 mmol/L'	Replace with: 'not driving if their blood glucose is at or less than 5.0mmol/L, or, if, whilst wearing a continuous or flash glucose monitor, the predicted glucose level is showing downward trends into the hypoglycaemia range.' Note, people with diabetes must have the car ignition off when checking glucose levels.	Addresses the change in technology use and cautions people with diabetes to be aware of predicted hypoglycaemia based on glucose sensors.	
3	B:3	3.3.2	66	Image superseded - <i>Diabetes and Driving - above 5 to drive.</i>	Replace with the most recent imagery/front cover published in April 2020.	Imagery reflects current version of this National Diabetes Services Scheme publication when users of the NTC/ Austroads AFTD search for it.	Available on the NDSS and Diabetes Australia websites – the weblink referenced on page 66 is correct.

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2. Discovery Work

Policy and Advocacy

Please describe any current policies, position statements or other advocacy activities undertaken by your organisation in relation to fitness to drive or transition to non-driving.

As noted above, Diabetes Australia, along with the Australian Diabetes Society and Australian Diabetes Educators Association participated in the NTC and Austroads diabetes working group as part of the development of the 2016 (amended in 2017) AFTD.

Since 2016, Diabetes Australia has continued to provide information and education about driving issues for people with diabetes. Diabetes Australia and state-based diabetes consumer organisations continue to provide individual advocacy and advice for people with diabetes regarding licencing issues.

Diabetes Australia advocated to drivers' licencing authorities in all states and territories to suspend the need for medical reviews during COVID-19. Most states granted people with diabetes extensions until September 2020.

Please identify needs and opportunities in this regard for your organisation. e.g.

- promotion and implementation of current policies / position statements;
- development of new policies / position statements;
- other advocacy opportunities

Diabetes Australia will continue to utilise digital and print communication channels to promote the messages in the guidelines and remind people with diabetes of their responsibilities about when they need to contact licensing authorities, and the importance of keeping up to date with their medical reviews.

Awareness raising for members

Please describe any current or recent activities aimed at raising awareness among your members regarding fitness to drive or transition to non-driving.

Diabetes Australia together with the Australian Diabetes Society and the Australian Diabetes Educators Association updated its diabetes and driving information to align with the NTC and Austroads 2016 (amended in 2017) AFTD.

Information regarding fitness to drive is available to people with diabetes via the Diabetes Australia and National Diabetes Services Scheme websites as well as State and Territory diabetes organisations. Information is also routinely promoted through newsletters, blogs, social media, as well referenced in a range of educational booklets and resources.

Education materials are used by credentialed diabetes educators and other health professionals in their education and management consultations with people with diabetes.

Please identify areas of need in relation to awareness raising for your members, as well as any opportunities to improve awareness raising. For example:

- What key messages need to be communicated about fitness to drive?
- What other key messages need to be communicated?
- What mechanisms of communication are available through your organisation?
- What opportunities are there to link with Austroads communication?

Diabetes Australia is exploring ways, such as utilising digital communications and engagement strategies, to more actively promote the *Diabetes and Driving* information booklet to people with diabetes. These communications could be shared with and linked to Austroads communications.

Key messages communicated include when people with diabetes must notify local driving authorities; responsibility of people with diabetes regarding licensing requirements; process for having medical reviews completed.

Credentialed diabetes educators and other health professionals access information designed for people with diabetes through Diabetes Australia and utilise this in their consultations and through their clinics.

Member education

Please describe any current or recent activities aimed at improving knowledge and skills of your members regarding fitness to drive or transition to non-driving.

Please identify areas of need in relation to education of your members, as well as any opportunities for your organisation or for Austroads and the NTC to improve education. For example:

- What aspects of managing fitness to drive need to be the focus of education?
- Do your members understand the medical condition reporting process and responsibilities? How can fitness to drive education be integrated into your current education offerings?

Focus areas for education:

- The guidelines provide clear advice regarding the requirements and responsibilities of when people with diabetes need to notify local licencing authorities about their condition. Despite this, there remains some community uncertainty around these requirements. This could be a key area to focus community education to both people with diabetes and health professionals.

Integration with current education offerings:

- Where appropriate, driving issues are integrated into all consumer programs, peer support activities and diabetes health professional presentations, with advice available through the NDSS Helpline.

The Australian Diabetes Society and the Australian Diabetes Educators Association disseminate information to health professionals through webinars, social media, podcasts, conferences, newsletters and publications.

Information Resources

Please describe any resources developed or promoted by your organisation to support members in managing fitness to drive and transition to non-driving.

A number of key consumer resources have been developed or updated to reflect NTC AFTD guidelines, including:

- Updated *Diabetes and Driving* booklet 2020. This includes the development of a Driver responsibility checklist (<https://www.ndss.com.au/about-diabetes/resources/find-a-resource/diabetes-and-driving-booklet/>)
- Updated *Moving on Up* booklet (*for you people aged 18-25 with diabetes*) <https://www.ndss.com.au/wp-content/uploads/resources/booklet-young-people-moving-on-up.pdf>

In mid-2020, Diabetes and RACGP released updated *Management of type 2 diabetes – A handbook for general practice* which includes an updated section on driving:

- (<https://www.racgp.org.au/getattachment/41fee8dc-7f97-4f87-9d90-b7af337af778/Management-of-type-2-diabetes-A-handbook-for-general-practice.aspx>)

<p>Please identify areas of need in relation to resources, as well as any opportunities for your organisation or Austroads and the NTC to improve access to appropriate resources.</p> <ul style="list-style-type: none"> • Are members aware of supporting resources available through Austroads or licensing agencies? • Are members aware of resources available through consumer and patient support organisations? • Are additional resources required to facilitate / support the fitness to drive process?
<p>The NTC and Austroads AFTD publication is referenced within the <i>Diabetes and Driving</i> information booklet and on the Diabetes Australia and NDSS websites.</p> <p>There is scope to expand the accessibility of the <i>Diabetes and Driving</i> information to a broader range of culturally and linguistic diverse drivers by producing the resource in different languages.</p> <p>There is also an opportunity to work with the Australian Diabetes Society and the Australian Diabetes Educators Association to produce publications for health professionals to increase the reach of the information.</p>
<p>Content accessibility</p> <p>Please describe any issues you experience accessing the AFTD medical criteria or supporting information. What design elements (figures, diagrams, tables, etc) are useful and should be preserved or expanded in the next edition?</p>
<p>No changes recommended.</p>
<p>Please nominate ways to improve access and general use of the AFTD content for health professionals?</p> <ul style="list-style-type: none"> • Is there value in trying to have the content integrated into practice or patient management software? • Would online CPD training units be useful? • What other types integration should we consider?
<p>Opportunities may include:</p> <ul style="list-style-type: none"> • Enabling medical package software (GP, Credentialed Diabetes Educators and Endocrinologists) to include safe driving checklists and related materials • working with ADS and ADEA to produce/develop online learning offerings for health professionals.