

RHA



The
Diabetes Safety
Organisation



Diabetes Safe Driving

Guidance for Employers

Foreword



The road transport sector keeps our economy moving. But it also faces ongoing challenges in recruiting and retaining the skilled people it needs. Supporting workforce health is an essential part of that picture.

Diabetes is a growing issue for our industry – not just for drivers, but for employers too. Left unmanaged, it can compromise safety, shorten careers, and increase risks for businesses. Yet with the right understanding and support, drivers with diabetes can remain safe, healthy, and productive.

That is why we have produced this Diabetes Safe Driving: Guidance for Employers. It explains clearly what diabetes means for driving, what your responsibilities are as an employer, and – crucially – the practical steps you can take to reduce risks and support your people.

At the RHA, we are determined to drive change. In our Lorry Drivers: The Vital Link- Attracting, Training and

Retaining Key Workers in the UK Supply Chain report, we highlighted how poor health is pushing experienced drivers out of the sector. Tackling diabetes must be central to reversing this trend – not just through raising awareness, but through meaningful action. We are proud to be the first organisation accredited as Diabetes Safe by the Diabetes Safety Organisation. We want to lead by example, and to help our members and the wider sector create workplaces where health is supported, risks are well managed, and drivers can thrive.

Being diabetes safe is not complicated. It is about awareness, sensible policies, supportive management, and a culture that enables drivers to manage their condition properly. The benefits are clear: safer roads, stronger businesses, and a healthier workforce.

I commend this guidance to all employers in our sector. By taking diabetes seriously and acting now, we can protect our people, our businesses, and the future of our industry.

Richard Smith
Managing Director, RHA

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About this guidance

Who is this guidance for?

This guidance is primarily aimed at companies in the road transport sector who employ commercial drivers or whose employees spend a significant part of their job driving for work. The guidance is intended for a UK audience.

While the guidance aligns to regulations and requirements for public roads, diabetes safe driving also applies to driving on non-public roads and driving on a worksite.

This guidance has been developed primarily in response to the significant and increasing number of working-age people with type 2 diabetes, however, the recommendations for diabetes safe driving will also benefit drivers with type 1 diabetes.

Scope and limitations

This guidance:

- Focuses specifically on driving practices, with vehicles as the 'workplace'. For more information on broader workplace considerations for diabetes safety contact the Diabetes Safety Organisation.
- Advises on the organisational and employment factors which impact driving safety for drivers with diabetes. It does not provide guidance on assessing the fitness to drive of drivers with diabetes.
- Does not replace DVLA regulations and information: employers and employees should consult DVLA and gov.uk websites for the most up to date information.
- Supplements and builds on general health and wellbeing employer initiatives with specific considerations for diabetes prevention and management. Many health and wellbeing efforts, such as stress reduction and fatigue management, will also contribute to diabetes prevention and management. This guidance does not seek to duplicate or recreate general health and wellness efforts or guidance for employees.
- The information provided here is for general informational purposes only and is not a substitute for professional medical advice, diagnosis, or treatment. Employees should always consult their physician or another qualified healthcare provider with any questions they may have regarding a medical condition. Never disregard or delay seeking professional medical advice based on this information.
- This content is for informational purposes only and does not constitute legal advice. For specific legal concerns, consult a licensed attorney or legal professional in your jurisdiction. Reliance on any information provided is solely at your own risk.

Every effort is made to ensure that information is accurate. Please note that information may change after printing.

I'm an employer. Why do I need to know about diabetes safe driving?

Why is diabetes an issue for employers?

Type 2 diabetes has nearly tripled in the UK in the last 20 years.¹ People who drive for a living are twice as likely to develop type 2 diabetes.

For employers of commercial drivers, this presents several significant business risks:

- **Safety:** When not managed effectively, diabetes has a significant impact on driving performance and safety.
- **Sickness:** Employees with diabetes complications typically require an extra 2-10 sick days per year.
- **Early workforce exit:** Diabetes complications, such as heart conditions and stroke, mean 28 in every 1,000 drivers aged 45-64 will exit the workforce early.
- **Moral hazard:** Drivers with diabetes will often hide the condition and risk their long-term health in order to prioritise safety and productivity, often without their employer being aware.
- **Compliance:** The Health and Safety at Work etc Act, the Equality Act and DVLA regulations place various obligations on employers for managing drivers with diabetes.
- **Liability:** Diabetes is considered a reasonably foreseeable risk in the workplace and employers may be liable if they have not taken reasonable and practicable steps to identify and reduce this risk.

What is diabetes?

Diabetes is a common metabolic condition where the body is unable to regulate blood sugar (blood glucose) levels. High blood sugar over a prolonged and continuous period (hyperglycaemia) can significantly damage multiple organs in the body, including the heart and cardiovascular system, kidneys and nerve system.

There are different types of diabetes. Type 1 is an auto-immune condition. Type 2 (which represents 90-95% of all cases) is an environmental condition, often developed in response to a range of external factors, such as diet, activity levels, and stress. Even within the different types, each person will have a different experience of, and different needs associated with, their diabetes.

There are different treatments for diabetes depending on its type and progression. Managing diabetes can take careful planning and vigilance. For some, it can require taking medication and/or eating at regular and specific times. For others, it can mean regular finger prick testing of blood sugars and injecting insulin. Diabetes can be complex and unpredictable. The impact of medication and treatment can change on a day-to-day basis based on other factors such as what the person has eaten and when, or whether they have been physically active and even the outside temperature that day.

¹ International Diabetes Federation Diabetes Atlas publications 2003 and 2024.

How does diabetes affect driving?

Unmanaged diabetes, or diabetes that is not managed effectively, can significantly impact driving performance, judgment and safety. The main risks associated with diabetes and driving safety are:

Complication	How common?	What’s the impact?
Severe hypo Blood sugar very low	2-6 severe hypos each month for every 1,000 employees	Sudden incapacitation requiring another person to assist
Non-severe hypo Blood sugar too low	40 non-severe hypos each month for every 1,000 employees	Impaired functioning e.g. awareness, coordination, fatigue, shaking
Diabetic peripheral neuropathy Nerve damage in feet: unable to assess pressure on pedal, pedal confusion	50% of all people with diabetes	3x more loss of control events in driving simulations; pedal error
Visual impairment Including retinopathy, cataracts, glaucoma	25% of people with diabetes develop retinopathy. 30% develop cataracts and 7% develop glaucoma	Sudden and gradual vision impairment including blindness
Hyperglycaemia Blood sugar too high: impaired functioning e.g. awareness, coordination, concentration	~1.2 million people with undiagnosed diabetes, unknown prevalence among people with diabetes but likely very common	Impaired functioning e.g. awareness, coordination, fatigue, shaking
Comorbidities Concurring conditions such as heart failure, stroke and sleep apnoea	930 strokes per week, 660 heart attacks per week due to diabetes	Sudden incapacitation, impaired functioning

It is the complications of diabetes that create driving safety risk. Drivers with well-managed diabetes are considered as safe as any other driver.

What is diabetes safe driving?

Diabetes safe driving means:

- Diabetes-related road safety risks are actively identified, managed and mitigated by employers and drivers
- Drivers with diabetes are supported by their employers to manage the condition effectively while at work and do not experience unfair discrimination
- Workplace practices do not increase an employee’s risk of developing type 2 diabetes

Shouldn’t it be up to the individual to manage their diabetes?

Supportive and enabling workplaces and practices are a fundamental requirement for individuals to be able to effectively manage their diabetes. Effective diabetes management means:

- Adhering to the diabetes management plan developed by the person’s healthcare team and actively preventing diabetes complications
- Complying with DVLA regulations

While it is up to an individual to manage their diabetes effectively, the employer must ensure there are no work rules or requirements which prevent or compromise this. For example, shift patterns and delivery targets must not prevent a person from being able to stop and test blood sugar levels every two hours, if this is required by DVLA.

As an employer, what do I need to know?

As an employer of commercial drivers, there are six things you need to know about the impact of diabetes on your employees and your business:

Need to know 1: Driving risks are increasing because type 2 diabetes is increasing

People who drive for a living are twice as likely to develop type 2 diabetes. This means an estimated one in six professional drivers have type 2 diabetes ².

Diabetes complications are a risk to safe driving. There are seven main risks to driving when diabetes is not managed effectively: severe hypos; non-severe hypos, foot nerve damage, impaired vision, hyperglycaemia, strokes and heart attack.

Need to know 2: Drivers with effectively managed diabetes are considered as safe as any other driver

Drivers who manage their diabetes effectively are not considered to be higher risk than the general driver population. However, when diabetes is not managed effectively, including where it is undiagnosed³, there are significant risks to driving safety.

Around 30% of people with diabetes are undiagnosed and more than half of professional drivers with diagnosed diabetes report not managing their diabetes effectively⁴.

¹ Carlsson S., Andersson T., Talbäck M., Feychting M. (2020). Incidence and prevalence of type 2 diabetes by occupation: results. Diabetologia 63:95-103

² International Diabetes Federation (2025). Diabetes Atlas 11th edition.

³ Diabetes Safety Organisation survey of RHA members, September 2024

Need to know 3: Diabetes can only be managed effectively with employer and workplace support

Diabetes safe driving can only be achieved when employers ensure there are no workplace barriers to effective diabetes management.

For example, shift patterns and delivery targets must not prevent a person from being able to stop and test blood sugar levels every two hours, if this is required by DVLA.

The DVLA assesses a person’s right to drive based on their medical fitness: it is the employer’s role to ensure a driver with diabetes is able to drive safely on a day-to-day basis.

Need to know 4: Diabetes is a reasonably foreseeable risk. Employers are required by law to manage diabetes in the workplace

The Health and Safety at Work etc Act 1974 requires employers to ensure, so far as is reasonably practicable, that employees and non-employees who are affected by what the employer does are not exposed to risk to their safety, health or wellbeing. That duty includes risks from diabetes.

If the employer has not taken reasonable steps to identify and reduce diabetes-related workplace risk, the employer may be liable, may not be covered by insurance and may face criminal charges. This may apply even if an employee has not disclosed their condition to the employer.

Diabetes will often meet the definition of disability under the Equality Act 2010. This legislation requires employers to make reasonable adjustments to remove or reduce disadvantage for employees with disability in the workplace and prevent discrimination against employees with diabetes.

Need to know 5: Diabetes safe driving is reasonable and practicable for employers to implement.

Diabetes safe driving can be achieved through reasonable and practicable measures taken by employers that will usually supplement and complement existing practices.

To ensure diabetes safe driving, employers need to:

1. Educate the workforce on how diabetes affects driving – short training (e.g. 30 mins) once a year is sufficient to ensure awareness and understanding of diabetes risk to drivers
2. Establish diabetes safe driving practices – e.g. ensuring shift patterns and journey targets do not create barriers to testing and treating blood sugar levels
3. Provide individualised support to employees with diabetes – most employees with diabetes will not need reasonable adjustments but each person should be considered on an individual basis
4. Make diabetes safe driving an organisational commitment – recognising people with diabetes in key policies and ensuring a supportive culture helps employees feel comfortable with disclosing and managing their condition at work

Need to know 6: Diabetes safety is good for business

In addition to the reduced safety and liability risk, employer and workplace support helps employees with diabetes to maintain their group 2 driving licence and prevent sick days and early workforce exit due to ill-health from diabetes complications.

As the number of people living with diabetes in the UK increases, a diabetes safe employer has a competitive advantage in recruitment and retention of drivers.

How do I ensure diabetes safe driving in my workforce?

There are four key requirements for diabetes safe driving. When implemented together, these measures help reduce diabetes-related driving risks and demonstrate that an employer has taken reasonable and practical steps to fulfil their legal obligations as an employer.

Diabetes safe driving is achieved through four key pillars:



The four requirements are described in more detail next.

1. Educate the workforce on how diabetes affects driving

Education is the primary tool for achieving diabetes safety as it increases personal responsibility and motivation. Providing short but regular training on how diabetes affects driving is the highest impact measure towards achieving diabetes safe driving.

Training should include information about:

- The high prevalence of diabetes, particularly among people who drive for a living
- Symptoms of diabetes and the prevalence of undiagnosed diabetes
- The progressive nature of diabetes and impact of diabetes complications on ability to drive and work long term
- Legal and regulatory requirements for driving with diabetes and legal protections against discrimination
- How to assist a person having a hypo

Where it is not possible to provide training to the full workforce, employers should prioritise drivers, line managers and other safety critical workers.

Related tools and resources:

Diabetes Safety Organisation training course: see www.diabetessafety.org or email training@diabetessafety.org

How to recognise and help a person experiencing a hypo: <https://diabetessafety.org/hypo-training-registration/>

2. Establish diabetes safe driving practices (safe driver, safe workplace)

Drivers are at higher risk of developing diabetes. Diabetes safe driving practices promote safe driver behaviours and safe workplace rules to help prevent diabetes and to help drivers with diabetes manage their condition effectively while driving.

There are various ways to promote diabetes safe driving practices, such as:

Safe driver

All drivers

- Planning breaks to eat and move
- Preparing nutritious food in advance
- Vision and health checks
- Diabetes safe driving training

Drivers with diabetes

In addition to the above:

- Carrying appropriate and back up testing and treating supplies
- Annual foot checks for peripheral neuropathy
- Compliance with DVLA reporting
- Adhering to diabetes management plan (not running blood sugar levels high)

Safe environment

- Line manager knowledge and attitudes
- Enabling and encouraging regular breaks
- Stress management and mental health support
- Where there are onsite cafeterias, offering nutritious food and drink
- Sufficient time for sleep and rest between shifts
- Hypo kits

(broader organisational requirements covered in requirement 4 – organisational commitment to diabetes safe driving)

Specific guidance for drivers is provided in more detail in an accompanying document to this guidance: Diabetes Safe Driving – Driver Guide.

‘Safe workplace’ means universal measures that remove or reduce the workplace factors that contribute to an individual’s risk of developing diabetes or being able to manage their condition at work. Universal measures are important because they apply to all professional drivers which means they will reach the one in four with diabetes who are undiagnosed and unaware they have the condition. Universal measures also ensure employees with diabetes are not unnecessarily singled out, which can be discriminatory.

Important universal measures that employers can consider include:

- Enable and encourage all drivers to take a break every two hours. This can be a short break but will allow for movement and stress-relief, both of which help lower blood sugar levels and reduce the risk of developing diabetes or diabetes complications. Some drivers with diabetes will be required by DVLA to stop, test and treat every two hours.
- Explicitly require DVLA requirements for driving with diabetes to be adhered to on worksites and other non-public roads e.g. if a driver is required by DVLA to test blood sugar levels before driving, explicitly require this as a ‘best practice’ across your work sites e.g. when moving vehicles around an operating centre, working in and around a warehouse.
- Ensure line managers complete basic training on diabetes. Line manager knowledge and attitudes are a significant factor in employee’s decisions to disclose their condition and to identifying and managing the condition effectively while at work.
- Ensure hypo kits are available at every place there is a first aid kit and/or defibrillator to ensure that a person experiencing a hypo can be swiftly and appropriately treated. Ensure first aiders are trained on the use of hypo kits.

Related tools and resources:

Driver guide.

Driving with diabetes: Drivers checklist.

Hypo kits (available from Diabetes Safety Organisation and other places that sell defibrillators and first aid kits)



3. Provide individualised support to employees with diabetes

As each individual will experience diabetes differently, individualised support for employees with diabetes helps to ensure each person has the customised support they need to achieve effective management of their condition. When work practices are diabetes safe, very little individualised support is needed.

Employers must conduct individual risk assessments for roles involving driving to ensure that diabetes does not compromise safety. This includes evaluating the potential impact of hypoglycaemia on driving and implementing measures to mitigate risks.

Under the Equality Act 2010, employers are required to make reasonable adjustments to accommodate employees with a disability, which may include diabetes, ensuring they can perform their duties safely and effectively. Reasonable adjustments don't have to cost money – they are more about taking a flexible approach to work.

Example of reasonable adjustments include:

- Allow flexible breaks and sufficient time for blood sugar monitoring and medication
- Provide safe, private and clean areas for insulin administration or rest during hypoglycaemic episodes
- If an employee needs to eat at set times, consider allowing them to have their lunch break at the same time every day.
- Modify work hours to accommodate medical or diabetes education appointments or to prevent disruption of diabetes management routines.

The employee with diabetes should be the best authority on what reasonable adjustments are needed.



4. Make diabetes safe driving an organisational commitment

There are various ways to demonstrate organisational commitment to diabetes safe driving, such as:

- Communicating the commitment to diabetes safe driving messages, particularly where the communication comes from leadership
- Including diabetes safety and diabetes-specific considerations in relevant policies (health and safety policy, fleet management policy, employee well-being policy)
- Surveying employees to understand prevalence, awareness of diabetes risks, and workforce needs
- Undertaking a risk assessment of specific diabetes risk
- Ensuring employees have confidential opportunities to disclose their diabetes
- Creating a culture where employees feel comfortable speaking up about health concerns and where diabetes and diabetes prevention (e.g. eating nutritious foods, exercising) are not stigmatised
- Becoming Diabetes Safe accredited.

What do I need to do next?

The recommendations in this guidance provide a starting point for improving how you manage workplace-related diabetes risks. Suggested next steps include:

Complete the organisational risk assessment

Assess your specific organisation’s diabetes risk using the Diabetes Safety risk assessment tool developed by the Diabetes Safety Organisation.

Issue a leadership communication

Set the tone at the top with a leadership communication recognising the seriousness of diabetes and how it affects and is affected by the workplace. Acknowledge duty of care and employment support and protections for people with diabetes and share your diabetes safety goal and plan. Invite employees to engage and share experiences and concerns related to diabetes safety at work. Share resources and tools such as the Driver Guide and driver checklists.

Run an employee survey

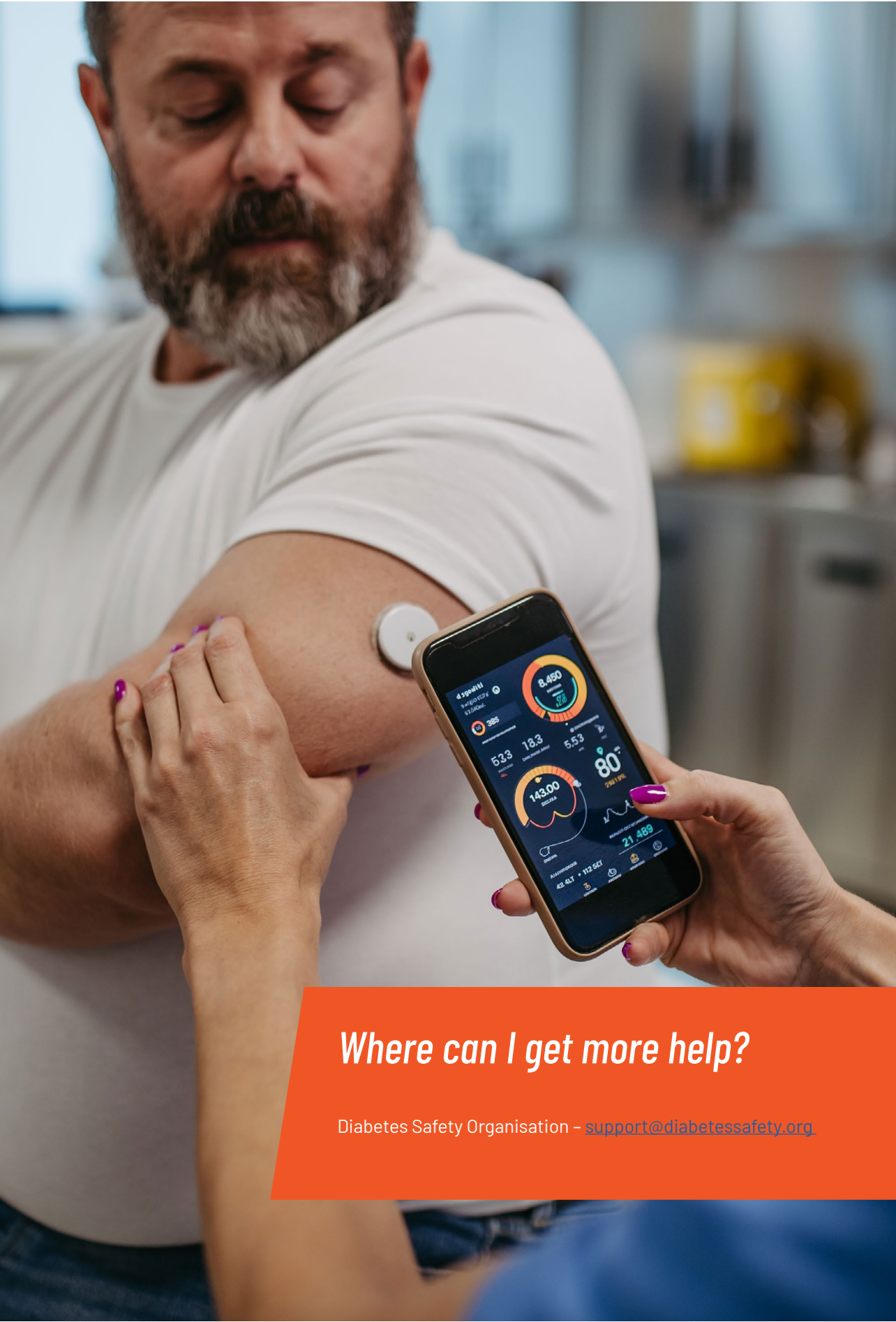
Diabetes is largely hidden in a workplace setting. An employee survey can help you to understand the specific prevalence and priority issues and risks in your workforce. The Diabetes Safety Organisation provides independent and anonymous employee surveys and reports free of charge.

Provide employee training

The single highest-impact step towards achieving diabetes safety is training high-risk and priority groups and line managers. This educates employees on their own risks of diabetes, how that could affect their ability to work and drive in the long term and what support is available to help employees prevent diabetes or manage their condition effectively to prevent diabetes complications.

Become Diabetes Safe accredited

Organisations which implement the recommendations in this guidance will likely qualify for Diabetes Safe accreditation. This accreditation is provided by the Diabetes Safety Organisation for companies that have put in place reasonable and practicable measures to prevent diabetes, support employees with diabetes and protect their business.



Where can I get more help?

Diabetes Safety Organisation – support@diabetessafety.org



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About the RHA

I The RHA is the leading trade association representing over 8,500 road haulage and coach companies across the UK, 85% of whom are small and medium-sized enterprises (SMEs). Our members are operators of vehicles who, between them, operate around 250,000 HGVs (half of the UK fleet) out of 10,000 operating centres and range from a single-truck company to those with thousands of vehicles. The UK road haulage sector is responsible for 81% of all freight movements and is directly involved in the transportation of 98% of agricultural products.

To find out more, [please click here: www.rha.uk.net](http://www.rha.uk.net)

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