

National Institute for Health and Care Excellence

PUBLIC HEALTH GUIDANCE – Workplace policy and management practices to improve the health of employees

Consultation on the Draft Scope from
18th June – 16th July 2013
Comments on the Draft Scope to be submitted
no later than 5pm on Tuesday 16th July 2013

Stakeholder Comments

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2. Please insert the **section number** in the 1st column. If your comment relates to the document as a whole, please put '**general**' in this column
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Name:	Ben Cook	
Organisation:	Optical Confederation	
Section number Indicate section number or ' general ' if your comment relates to the whole document	Page number	Comments Please insert each new comment in a new row.

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General	<p>The Optical Confederation represents the 12,000 optometrists, the 6,000 dispensing opticians and 7,000 optical businesses in the UK who provide high quality and accessible eye care services to the whole population. The Confederation is a coalition of the five optical representative bodies: the Association of British Dispensing Opticians (ABDO); the Association of Contact Lens Manufacturers (ACLM); the Association of Optometrists (AOP); the Federation of Manufacturing Opticians (FMO) and the Federation of Opticians (FODO). As a Confederation, we work with others to improve eye health for the public good.</p> <p>One of our social functions is to maintain the eye health and sight of the working population and we therefore very welcome and support the scope of this NICE public health guidance, which seeks to improve the health and wellbeing of employees by making managers aware of their staff's health issues.</p> <p>We also welcome NICE's intention to publish additional guidance to take into account employees with chronic diseases and long term conditions and older employees.</p>
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4.2	5	<p>The Health and Safety (Display Screen Equipment) Regulations 1992 require that employers give free eye tests to employees who use display screen equipment if they ask for them. These regulations include the requirement of an employer to pay for a full eye examination. (1)</p> <p>However, uptake by employers in the UK is relatively poor and employees are generally unaware of this requirement, e.g.</p> <ul style="list-style-type: none">- One in ten employers have no eye care policy at all.- One in five big businesses (18%) fail to pay for regular sight tests- 40% of big businesses say they would refuse to make a contribution towards the cost of spectacles required solely for VDU work. (2) <p>Organisations would benefit from clear guidance from NICE that encourages employers that</p> <ul style="list-style-type: none">- informs VDU about and- encourages users of their entitlement to, the benefits of regular eye examinations. <p>Managers of professional drivers should also ensure that their employees have good vision and can drive safely and companies should have in place a policy to check the eyesight of their professional drivers. The DVLA states that a professional driver must have a visual acuity at least 0.8 (6/7.5) measured on the Snellen scale in their best eye and at least 0.1 (6/60) on the Snellen scale in their other eye. Glasses or contact lenses can be worn to reach this standard but they can not have a corrective power greater than plus (+) 8 dioptries. The driver must also have a horizontal visual field of at least 160 degrees, the extension should be at least 70 degrees left and right and 30 degrees up and down. No defects should be present within a radius of the central 30 degrees. (3)</p> <p>We hope these points will be included in the final scope.</p>
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