

National Institute for Health and Care Excellence

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

Consultation on the Draft Guideline from Wednesday 24 September – Wednesday 5 November 2014

Comments to be received no later than 5pm on 5 November 2014

Stakeholder Comments

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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.
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>Vision impairment - defined as sight impaired (partially sighted) or as severely sight impaired (blind) - affects people of all ages but is mainly age related(1). Through early detection and treatment vision loss can often be mitigated and where it cannot be, people can be better supported to live more independent lives.</p>

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General		We welcome and support NICE in its attempts to publish public health guidance to improve the health and wellbeing of employees. We note a significant omission from this version of the guidance that is the need to prevent sight loss and otherwise support people with sight loss to live active and independent lives as well as stay in work if they so choose.
Recommendation 1 – create an organisation committed to workplace health	3	We support the goal to encourage employees and employers to consider health and wellbeing as an integral part of daily work life. Work is where people spend most of their time and therefore there remains much potential to avoid long term problems with health and at the same time reduce the growing pressure on the health system. However to make this deliver results, key health checks should become part of work. For example despite the highly sophisticated primary eye care service that we have, too many

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		<p>employers and employees do not know that people with visual impairment</p> <ul style="list-style-type: none"> • are three times more likely to suffer from depression (2) • are more likely to be unemployed for longer and earn less than their colleagues (3) and unemployment is a major cause of reduced subjective wellbeing • are more likely to suffer from social exclusion due to reduced participation in society leading to diminished wellbeing (4) and that • 50% of sight loss can be prevented and therefore it is important to detect conditions at an early stage. This will improve peoples' quality of life and reduce long term costs for the health and social care system. Today the societal cost of visual impairment is estimated to be £22bn per year. It is also important to note that the numbers of people with visual impairment are set to double by 2050 unless action is taken (3).

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		Changing the culture in workplaces to improve the uptake of preventative services will be important if this guidance is to deliver tangible results.
Recommendation 2: Ensure facilities, policies and procedures show a commitment to employee health and wellbeing	3	The guidance aims to complement existing NICE guidelines promoting mental wellbeing at work (PH22) and therefore as NICE notes it should be subject to the requirements outlined in the Equality Act 2010. It is essential for organisations to make sure that they provide adequate equipment and services for employees. People with visual impairment for example are under the Health and Safety (Display Screen Equipment) Regulations 1992 entitled to free eye tests if they use display screen equipment for work. These regulations include the requirement of an employer to pay for a full eye examination.

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		<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 Visual Display Unit (VDU) work (5). <p>Therefore organisations would benefit from clear guidance from NICE on these issues and also to ensure employers inform their employees about their rights to a funded sight test – e.g. if they are a regular VDU user or aged 40 years old and over with a family history of glaucoma.</p> <p>Managers of professional drivers should also ensure that their employees have good vision and can drive safely and all</p>

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		<p>companies should have in place a policy to check the eyesight of their professional drivers.</p> <p>The NHS already funds sight testing for those aged over 60 years old on a bi-yearly basis (and sooner where clinically required) (6). Therefore there is already a cost-effective system in place to keep employees healthy and independent. However the take-up of this service is low. NICE can help by making both employers and employees aware of the importance of regular sight tests and how these are NHS-funded and available to people over 60, or with glaucoma, a family history of glaucoma, or diabetes, and those on other means-tested benefits. Encouraging uptake will enable people to access services more effectively and doing so will improve workers' health and wellbeing.</p>
Recommendation 3:	4-5	The Optical Confederation is supportive of the current recommendations. However rather than being structured as the

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Ensure fairness and justice throughout the organisation		third out of nine recommendations these values and objectives ought to form an overarching set of norms which every recommendation is subject to.
Recommendation 5: Empower line managers to enhance employee's health and wellbeing at work	5	Half of all sight loss can be prevented. Working preventatively and encouraging employees to undertake regular sight tests will both help and support people and prevent significant future costs. The main reasons that sight test services are currently under-utilised is due to poor information and a culture that does not place sufficient emphasis on prevention. NICE can help improve the health and wellbeing of employees by highlighting the importance of regular sight tests for employees in its guidance. Employers in turn, by focussing on eye health, will be promoting and ensuring wellbeing of their employees.

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Recommendation 7 – provide line managers with ongoing training	7-8	<p>The Optical Confederation is supportive of NICE's mention of the need to promote the awareness of mental health and wellbeing.</p> <p>This is something that is relevant to employees with sensory loss as visually impaired people are more likely than their colleagues to suffer reduced subjective wellbeing. This can take the form of social exclusion due to reduced participating in society or depression. People with visual impairment are three times more likely to suffer from depression than their colleagues (2).</p>
Recommendation 10 – create a national database for workplace health and wellbeing data	8	In principle the Optical Confederation is supportive of creating a national database for workplace health and wellbeing data. However as the recommendations are currently written it is difficult to foresee how this will be achievable in the near future.

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References		<p>1. Access Economics (2009) Future Sight Loss (1): The economic impact of partial sight and blindness in the UK adult population, 1.1 Definitions of Partial Sight and Blindness</p> <p>2. Evans JR et al (2007) "Depression and anxiety in visually impaired older people". Ophthalmology. 114(2): p283–8</p> <p>3. Access Economics (2009) "Future Sight Loss (1): The economic impact of partial sight and blindness in the UK adult population". P.170</p> <p>4. Gjonca et al (2005) "An investigation of the circumstances of older people with sight loss: An analysis of the English Longitudinal Study of Ageing"</p> <p>5. Research study conducted by Opinion Matters between 8 – 12 February 2010. Sample: 255 HR Professionals. 'Square Eyed Britain' report conducted by 72 Point between</p>

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		1 – 9 August 2005. Sample: 2,750 Office Workers. 6. NHS Choices - Eye health tips for older people http://www.nhs.uk/Livewell/over60s/Pages/eyehealth.aspx#close 28.10.2014

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