

National Institute for Health and Care Excellence

PUBLIC HEALTH GUIDANCE – Workplace policies and approaches to promote and protect the health of older employees

Consultation on the Draft Scope from
Wednesday 26 March – Monday 28 April 2014

Comments on the Draft Scope to be submitted
no later than 5pm on Monday 28 April 2014

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Stakeholder Comments

Please use this form for submitting your comments to the Institute.

1. Please put each new comment in a new row.
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
3. **Please note - comments forms with attachments such as research articles, letters or leaflets cannot be accepted. If comments forms do have attachments they will be returned without being read. If the stakeholder resubmits the form without attachments, it must be by the consultation deadline.**

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, 6,000 dispensing opticians, 7,000 optical businesses and 45,000 ancillary staff in the UK, who provide high quality and accessible eye care services to the whole population. The Confederation is a coalition of 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 (Ophthalmic and Dispensing) Opticians (FODO). As a Confederation we work with others to improve eye health for the public good.</p> <p>One of our key goals is to maintain and improve the eye health and vision of the working population. We therefore warmly welcome and support the scope of this NICE public health guidance, which seeks to promote and protect the health of older employees.</p> <p>We also welcome the increased numbers of older workers in employment and NICE's intention to incorporate the Equality Act (2010) and improve opportunities for older people and to help them to find and stay in work if they choose to do so.</p>
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4.3 (Q1)	7	<p>Vision impairment - defined as sight impaired (partially sighted) or as severely sight impaired (blind) - affects people of all ages but is more prevalent in those over 60 years of age (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 in older age.</p> <p>The most cost-effective measure to prevent sight loss is to detect conditions at an early stage. Half of all sight loss can be prevented and significant downstream costs can be avoided. The current costs of visual impairment were estimated at over £22bn annually in 2008 (2). Furthermore, the number of people with visual impairment is set to double by 2050 unless action is taken (3).</p> <p>Given the prevalence of avoidable sight loss in older people, regular sight tests are important for their wellbeing. If detected early through screening – for example regular sight tests - older workers can maintain good eye health for longer (4). This is particularly true for conditions such as wet age-related macular degeneration, glaucoma and diabetic retinopathy.</p> <p>The NHS already provides sight testing for people aged 60 and over usually on a two yearly basis (and sooner where clinically required) (5). Therefore, there is already an established system in place to keep older employees healthy and independent. However the take-up of this service is not as good as it should be.</p>
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		<p>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 the age of 60, or with glaucoma, a family history of glaucoma, or diabetes, and those on other means-tested benefits. Encouraging take up would help to detect more eye conditions earlier, improving outcomes and public health.</p> <p>Making employers and employees more aware of eye health and sight impairment is important for several reasons. Firstly, individuals with visual impairment are more likely to be unemployed for longer before pension age and earn less than their colleagues (6). It is extensively documented that unemployment results in reduced wellbeing. Therefore more needs to be done to inform employers and employees of the importance of eye health and preventing avoidable sight loss.</p> <p>Secondly, older blind and partially sighted people are three times more likely to experience depression than those with good vision (7). In addition, individuals suffering from visual impairment are more likely to suffer from social exclusion due to reduced participation in society leading to diminished wellbeing (8).</p>
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		<p>Thirdly, older workers have a key role to play in areas where there are skills gaps. Older people with a visual impairment need to be supported, and employers made aware that with reasonable adaptations, older workers with sight loss have a lot to offer and provide vital skills.</p> <p>NICE can help improve the wellbeing of older people by highlighting the importance of regular sight tests for older employees in its guidance. Employers in turn, by focussing on eye health, will be promoting and ensuring wellbeing of their older employees.</p> <p>Employers should also be encouraged to inform employees about their right to sight tests under <i>Health and Safety (Display Screen Equipment) Regulations (9)</i>. This regulation entitles workers who qualify for a sight test paid for by their employer. This is very important for older workers given the prevalence of presbyopia (a natural change in the eye that reduces the ability to focus on near tasks) is close to 100% by age 45. With time, older employees will find their near vision reduces further and by their late 50s will often require a different prescription for reading and computer work. This mechanism to deliver an essential eye care service (and ensure the wellbeing of older employees) already exists. NICE should include this in its guidance and which would help to ensure that these services properly utilised.</p> <p>In summary our recommendations are for NICE to:</p> <ul style="list-style-type: none">• Promote the importance of eye health and its role in the wellbeing of older employees and in particular to use guidance to increase awareness about preventative eye care.
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		<ul style="list-style-type: none">• Improve access to regular sight tests by advising older employees of their entitlement to NHS or employee funded sight tests as appropriate.• Ensure that employers and employees understand the entitlements to sight tests (and vision correction if necessary) under the <i>Health and Safety (Display Screen Equipment) Regulations</i>.• Encourage employers to actively promote eye health, by including a question about when an employee last had their eyes tested in employer medical assessments or occupational health reviews. Those who have not had a sight test in the past two years could then be recommended or encouraged to do so.• Request that employers encouraging all employees who drive to have their eyes tested regularly (see response to Q2 below).• Explain to employers that that the benefits of older workers with vision impairment will in most cases outweigh any modest adjustments to allow them to continue to work. There is also a Government scheme called Access to Work which supports employees with vision impairment (10). This is particularly important given that unemployment is known to reduce subjective wellbeing.
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4.3 (Q2)	7	<p>As noted above, regular sight tests are essential to detect avoidable sight loss and ensure prompt interventions. Through prevention, problems with vision will not stop older workers from continuing to work beyond the state retirement age if they would like to.</p> <p>It is also cost-effective to support older workers with visual impairment to stay in work, and Government schemes are in place to do this.</p> <p>We would like to reiterate that any recommendations should extend to people who drive during the course of their employment or commute to work. There were approximately 3,000 road casualties relating to poor eyesight in 2012, costing an estimated £32.9 million (11). Increasing the take up of sight tests would not only improve road safety, as we have explained above it would also detect a range of eye conditions at an earlier stage, both of these would help to keep older people working for longer.</p>
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	References: <ol style="list-style-type: none">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 Blindness2.) Access Economics (2009) Future Sight Loss (1): The economic impact of partial sight and blindness in the UK adult population, p1703.) Ibid, p43-46.4.) https://www.actionforblindpeople.org.uk/resources/about-sight-loss/prevention-and-protecting-your-sight/5.) http://www.nhs.uk/Livewell/over60s/Pages/eyehealth.aspx6.) Gjonca et al (2005) "An investigation of the circumstances of older people with sight loss: An analysis of the English Longitudinal Study of Ageing"7.) RNIB – "Key information and statistics on sight loss" http://www.rnib.org.uk/knowledge-and-research-hub/key-information-and-statistics. 03.04.20148.) Evans JR et al (2007) "Depression and anxiety in visually impaired older people". <i>Ophthalmology</i>. 114(2): p283–89.) <i>Health and Safety (Display Screen Equipment) Regulations</i>¹1992 as amended in 2002 which implemented European Directive (90/270/EEC)10.) https://www.gov.uk/access-to-work/overview11.) RSA (2013) "Healthy eyes, safer roads": p3.

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