**Factsheet for employers and employment**

**professionals**

# People with sight loss at work – guidance and good practice for Risk Assessors

## About this factsheet

This factsheet is for anyone who needs help with safety management in a place where people with sight loss work. People with sight loss compete for, perform and succeed in a wide range of jobs. Many need little or no adjustment to their workplace or to working practices, and yet many employers worry about employing people with sight loss, sometimes having concerns for their safety and for the safety of others.

This guidance has been compiled in consultation with: health and safety professionals; workplace risk assessors; employers; and people with sight loss. We aim to help risk assessors by providing the information they need to reach decisions, and ensure a safe environment with safe working guidelines.

## 1. The need for guidance

Carrying out a risk assessment of the workplace or an activity for someone with sight loss doesn’t have to be difficult, but it can sometimes be a daunting prospect. If you haven’t worked with people with sight loss before, it can be very easy to over-estimate risks or make assumptions about what people can or can't do.

People who risk assess the workplaces and activities of people with sight loss often approach RNIB for advice. While we are aware that mistakes can be made, we also know that risks can be managed successfully, and we want to share good practice.

This guidance has been produced to highlight some of the things that we're often asked about, share examples of successful risk management and suggest sources of help.

We are also aware that risk assessment, or health and safety in general, has been used as an excuse not to employ people with sight loss (Hurstfield et al, 2003). We hope that the guidance we have put together will help to overcome unnecessary barriers.

Most importantly, we hope that this guidance helps you to reach informed decisions and, in so doing, ensures that people with sight loss can continue to work effectively and safely.

## 2. People with sight loss at work

In the middle of the last century, people with sight loss were encouraged to work in specific occupations. These included jobs as switchboard operators, masseurs, piano tuners and even basket weavers.

Things have changed quite considerably and people with sight loss now succeed in a range of jobs across different sectors. RNIB’s “This IS Working” series gave examples of people working in a variety of jobs, including: a company director; senior physiotherapist; sales and marketing manager; shop owner; policy officer; development and funding officer; teacher; administrative assistant; and outreach worker.

People with sight loss do succeed at work. When safety management works well, we know that all employees, including any with sight loss, can work safely.

**3. The process of risk assessment**

Employers are required by law to manage health and safety in the workplace. Each organisation will have their own ways of doing this and the roles of individual risk assessors can be different.

This document does not deal with the mechanics of undertaking and recording risk assessments. The principles are the same for everyone, but guidance is already available on dealing with “disability” in relation to safety management. See, for example, 'Health and Safety for Disabled People and Their Employers (Health and Safety Executive)’.

IOSH, the Chartered body for health and safety professionals, offers advice on their website about the responsibilities that the Equality Act imposes on those who manage safety.

They specifically suggest that:

* the Equality Act has an effect on the way you manage safety.
* while you may be able to use health and safety issues related to disability as a reason not to employ someone – or to refuse a service to someone – you can only do so if certain conditions are met.
* if the safety of a task may be affected by someone's disability, then a risk assessment should be carried out for everyone, not just for disabled employees.
* if you don't document the steps you've taken to consult disabled workers or customers, and to make reasonable adjustments, your organisation could be involved in an expensive tribunal case.

This factsheet will focus on how risk assessment can affect people with sight loss at work.

**4. Key points for risk assessment**

In general, the following points will help to shape your risk assessments:

**4.1 Risk assessments should address a task and everyone**

**involved**

Whilst the legislation requires employers to identify groups that might be at risk of harm, telling someone that “you must be risk assessed” sends out a negative message. In a way, it suggests that the individual is the issue, when this is clearly not the case. It sounds much more positive to tell someone that activities are being assessed.

**4.2 The individuals involved must be consulted**

The Health and Safety Executive’s "Five Steps to Risk Assessment" recommends that: ‘In all cases, you should make sure that you involve your staff or their representatives in the process. They will have useful information about how the work is done that will make your assessment of the risk more thorough and effective.’

Your employee with sight loss is usually the best person to describe how their sight loss affects them and you should be able to tap into that knowledge. Risk assessments carried out without the involvement of employees with sight loss are significantly more likely to be inaccurate.

**4.3 “Adjustments” must be considered as part of the process**

Employers have a responsibility to make “reasonable adjustments” to working practices and physical features. This is likely to include the provision of auxiliary aids. While this might be beyond your area of responsibility as a risk assessor, you must be prepared to take proposed changes into account.

**4.4 It is important that you do not make assumptions about**

**an individual’s functional vision**

Most people with sight loss have some useful vision. Some people will be able to see fine detail, while some may have very good peripheral vision. Even people with the same eye condition can have widely different levels of useful sight.

Employers often ask for medical guidance to help understand what people can or can’t see. However, this is often presented in medical terms and is usually lacking an occupational focus.

Asking the individual to describe their sight is often the best way to gather information to assess risk. Professionals who work with people with sight loss can be another source of information. Making assumptions about what people can and can’t see will produce flawed risk assessments.

**5. Common issues**

Employers often contact RNIB to ask for advice about specific worries they have about the safety of a colleague with sight loss. Things we have been asked about include:

**5.1 Guide Dogs at work**

Guide dogs are one example of an aid to mobility. However, it has been estimated that as few as one or two per cent of people with sight loss use guide dogs to get around. It is therefore important that you don't assume that people either use guide dogs, or choose to bring them to work.

Having said that, if an employee brings a guide dog to work, proper planning is required to ensure that things run smoothly. In most cases, working practices can be adopted to ensure a safe and comfortable working environment.

Some of the common questions revolve around:

Toileting – a suitable area must be identified for the guide dog. While in some places there are very obvious locations for this, some companies (particularly in town centres) find this difficult.

Moving around the building – the extent to which an individual uses a guide dog once at their workstation will vary, depending on the person's other mobility skills and knowledge of the environment. It is important that the guide dog user is aware of his or her responsibilities and working rules should be established. These could include where the dog goes when not “on harness” or how often breaks are required.

Induction/emergency procedures – it may be necessary to review your evacuation plans. There may already be a structure in place (such as personal emergency evacuation plans) to facilitate this within your organisation. Standard instructions, such as those issued during induction, should be available in the correct format for the employee to read.

Colleagues – the extent to which colleagues interact with guide dog users is likely to vary. There are both positives and negatives to this. For example, colleagues can distract a “working” dog, or could help by assisting with “walking” the dog. Colleagues will need to know their responsibilities. For example, they may need to know when it might be appropriate to play with or to walk the dog, or how to tell when the dog is working. Some guide dog users would prefer their colleagues not to interact with their dog at all.

Allergy/fear of dogs/cultural influences – Some thought may need to be given to where guide dogs are based while people are working to allay concerns. Some people will have genuine and significant worries about dogs in the workplace.

If in any doubt about any aspect of working with guide dogs, representatives from the Guide Dogs for the Blind Association will want to help you with this.

**5.2 Mobility and travel**

When considering potential risks involved in travelling, it is important to bear in mind that most people with sight loss will travel easily with no problems. At the same time, some may need support.

We can't assume that people with the same eye condition are affected in the same way, as people with the same eye condition often see the world in entirely different ways. Familiarity with the area and environmental factors, such as lighting, are other things that can affect someone’s mobility.

Additionally, people adjust to sight loss in different ways. It is safe to say that the mobility skills of people with sight loss vary considerably. Some people travel independently, while others use mobility aids or support from others to travel.

It probably goes without saying that an individual should be consulted when considering potential risks with travel. It is also good practice to ensure that any concerns about mobility are kept in perspective – issues should not be allowed to be blown out of proportion.

If an individual is looking for mobility support for specific parts of their travel, two agencies might be able to help.

In each local authority area, there are mobility specialists, sometimes known as rehabilitation workers, who can teach people how to use mobility aids and help them learn to navigate routes. They either work for the local authority social work team, or the organisation that holds the register of people who have been certified “sight impaired”.

The Access to Work scheme supports people at work and individuals can apply for financial assistance to travel to and from work and within work. The Access to Work scheme can only cover the additional costs of travelling to meet disability-related need and it is not intended to replace the standard costs involved in business use.

**5.3 Lighting**

Both the quality and quantity of lighting has a significant impact on all working environments. For some people, it can help to create a comfortable workplace. For others, lighting can pose a barrier to effective working.

Guidance on lighting levels tends to be either general, aimed at a technical audience, or individual, based on one person's experience. For example, Building Site (1995), suggests that light levels are crucial. It suggests that lux levels (a measure of luminance) for people with sight loss should be 25 per cent to 50 per cent above the “general” level.

The difficulty with such generalised recommendations is that individuals have very different needs. Increasing the general "background" lighting levels might not necessarily make a working environment safer or more comfortable.

For some people, increasing background light would be helpful. Other people find it difficult to work with high levels of lighting and prefer a darker working environment.

One way to deal with this would be to introduce additional light sources, rather than make the existing fittings brighter. This is particularly true if units can be switched on and off to allow more control over lux levels.

As well as the amount of light, the source of light is also an important factor. Many people find that natural light is best. This can mean that making the best of light from windows is preferable to using electric lighting. Similarly, some people find that light fittings emulating natural light (daylight bulbs) are very effective.

The key to resolving lighting issues is to talk to the people involved and call in specialists where necessary. Sometimes simple changes can make a huge difference to a working environment. At other times, more work is required to strike a balance between the needs of one individual among a group of other employees.

**5.4 Trip hazards**

Research suggests that people with sight loss are more likely to trip than sighted people (Legood et al, 2009). Yet, when we introduce controls to reduce risk, it is very important to keep a sense of perspective. Introducing “no-go” areas, such as stairs or in specific areas you perceive as dangerous, can be discriminatory. It is very unlikely that the only way to manage potential trip hazards is to exclude people from certain areas, as other alternative steps can be taken to reduce risk. Most people with sight loss can navigate safely around buildings and other workplaces. If you feel strongly that there are parts of a workplace that are not safe, you should seek advice.

**5.5 Lone working**

Working alone is an integral part of many jobs. Whether this involves visiting customers at home, working from other premises, travelling either locally or more widely, or working from home.

Lone working is an area that often raises concerns for employers. But while there may be occasions when someone with sight loss is exposed to risk, these risks are often no greater than a sighted colleague would face.

It is very easy to make assumptions about potential dangers and introduce unnecessary risk controls. And yet, very many people with sight loss work successfully and safely on their own, sometimes in challenging environments.

**Considering risks**

It is important to consider how an individual is affected by sight loss.  Some people get around independently and confidently. Others look for support, particularly in unfamiliar environments.

Some employers have found it helpful to consider the extent of an individual’s sight loss. Having an understanding of what a person can or cannot see can make it easier to discuss risks. Medical “evidence” is not likely to help with this. A diagnosis does not usually describe the extent of functional vision. Most of the time, an employee with sight loss is the best person to describe this to you.

**Minimising risk**

Your starting point for managing risks should be the systems you already have in place for your lone workers. Your local working practices must be robust and comprehensive, so that the work of all of your lone-working employees is covered. Your employee with sight loss is no different in this respect.

**5.6 Evacuating the building**

Most people with sight loss will understand the need for plans to deal with unexpected evacuations, for example, in the case of fire. Employers generally deal with evacuation routes, procedures and assembly points during an employee’s induction period.

It is important to ensure that written evacuation procedures are available in different formats during induction. For example, having a Word version of the procedures available will allow most users of assistive technology to read them.

Some people with sight loss would welcome the chance to familiarise themselves with the main routes and practise leaving the building by emergency exits. This could be arranged with their line manager when starting work.

If an employee with sight loss is finding it difficult to learn routes and needs some support, it may be appropriate to allocate a “buddy” to assist with evacuation until routes are learned.

Further information can be found in the publication “Fire Safety Risk Assessment: Means of Escape for Disabled People”, Department of Communities and Local Government, 2007.

**5.7 Stairs**

While risk assessing the use of stairs, your starting point should be to assume that people with sight loss are subject to the same risks as any other employee. Therefore, any steps you might take to reduce risk apply to all employees.

If you believe that there are risks to stair users, you may want to consider the following extracts from Building Sight:

“Lighting on stairs should be sufficient to highlight any obstructions on the flight of the stairs, but should highlight the treads as opposed to the risers to emphasise each step. It is very important that ceiling-mounted luminaires do not become a glare source – they should be well shielded. Alternatively, large-area, low-brightness sources can be mounted on a side or facing wall.”

“The stair covering should not have a pattern that can cause confusion between tread and riser or between one tread and another.”

It is worth pointing out that making physical changes of this type may be the responsibility of your landlord, but this does not mean that you shouldn’t raise the issues with them.

**5.8 Safe use of computer systems**

Employers are required to “analyse workstations, and assess and reduce risks. Employers need to look at the whole workstation including equipment, furniture, and the work environment; the job being done; and any special needs of individual staff. The regulations apply where staff habitually use display screen equipment as a significant part of their normal work.” (HSE, 2006).

It is entirely likely, then, that the needs of people with sight loss will be highlighted as part of a general risk assessment of display screen equipment.

In addition to this, employees will often highlight difficulties in using computer systems related to their sight. Unless the individual has a good idea of their requirements, it is usually a good idea to seek specialist advice. RNIB, through our Helpline service, will be able to recommend ways to make it easier to change the way screens look, or alternative ways of accessing screen content.

**5.9 Machinery**

Employers often have legitimate concerns about people with sight loss operating power tools, hand tools or other machinery such as grass cutting or gardening power tools.

There will be times when you will need to eliminate risk by specifying tools that should not be used at work.

However, it is very important to discuss with an individual exactly how their sight restricts them and how real the risks are. Bear in mind that some new employees may underplay any difficulties as they may have had negative experiences with past employers.

Another factor to take into account is the environment in which people will be working. If you can control the immediate work area, machinery can be made safe to use. For example, in a factory, machines can be fitted with guards and walkways restricted, to improve the safety of the work environment. If you are in doubt, ask for advice.

### 5.10 Caring for others

Many people with sight loss work in jobs where they provide social care services. This can include working in nurseries, care homes and delivering community services.

As you would expect, the generic risk assessments carried out to cover the working routines of care workers are often sufficient to ensure a safe working environment for people with sight loss.

However, employers sometimes have concerns about certain aspects of working that could be perceived as dangerous. These could include, for example:

#### Reading facial expressions to predict behaviour:

This is a contentious issue. The vast majority of people with sight loss will be able to read facial expressions, but some will find it difficult or impossible. Logically, this could suggest that someone with sight loss may be at higher risk of sudden changes in behaviour.

However, there is a considerable body of research that shows how people are able to perceive mood or feelings from verbal communication only. So the extent of the risk involved is not at all clear.

Reducing risk in this situation calls for a balanced judgement based on an understanding of an individual’s sight and the requirements of the job.

#### Missing visual cues, such as evidence of substance misuse or

**concealed weapons:**

Potential hazards of this kind could be addressed by adopting working practices that apply to all employees. This could include ensuring that thorough background information is obtained with referrals. Additionally, initial assessments of the individual customers should cover the likelihood of issues arising. There may be situations where it is safer for people to work in pairs.

#### Reading correspondence while visiting customers:

In some jobs, workers may be required to read forms or letters when visiting people in their homes or other settings. Generally, this can be overcome by using assistive technology, such as portable video magnifiers or scanners.

#### Perceived difficulties dealing with children:

Nurseries, after school clubs and similar establishments that provide childcare services have well-developed risk management systems in place. If someone with sight loss starts work, the working practices in place are often robust enough to ensure safe working.

Occasionally, parents have concerns about people with sight loss caring for their children. Concerns could include tripping, not seeing children putting things in their mouths, escorting children in the local area or identifying parents when children are collected.

In your role as a risk assessor, you should discuss concerns with the individual to establish whether any of these concerns are genuine and, if so, how they could be minimised. For example, another worker could check the identity of parents collecting children.

It is really important that the concerns of parents are not confused with actual risk.

**6. References**

'Building Sight: A handbook of building and interior design solutions to include the needs of visually impaired people', P Barker, J Barrick and R Wilson, London HMSO in Association with RNIB, 1995

‘Fire Safety Risk Assessment: Means of Escape for Disabled People’, Department of Communities and Local Government, 2007

‘Five Steps to Risk Assessment’, Health and Safety Executive

‘Health and Safety for Disabled People and Their Employers’, HSE ([Health and safety for disabled people at work - HSE](https://www.hse.gov.uk/disability/))

J Hurstfield et al, ‘The extent of use of health and safety as a false excuse for not employing sick or disabled persons’, research report 167, HRC/DRC, 2003

JMU Access Partnership, Fact Sheet 24 – Lighting

Legood R, Scuffham PA and Cryer C, "Are we blind to injuries in the visually impaired?  A review of the literature", June 2009

RNIB and Thomas Pocklington Trust, 'Make the most of your sight, Improve the lighting in your home", RNIB and Thomas Pocklington Trust, 2009

‘This is Working 2’, RNIB, October 2009

‘Working with VDUs’, HSE leaflet INDG36(rev3), revised 12/06

**7. Sources of help and further information**

**7.1 RNIB**

**Employment services for employers**

We can help you retain a current employee who is losing their sight, and we can help you to recruit someone with sight loss.

Advances in technology mean that people with sight loss can now overcome many of the barriers to work that they faced in the past, and government schemes like Access to Work mean that many of the costs can be met.

We would be happy to talk to you. Please contact us through our Helpline:

Telephone: 0303 123 9999

We're open 8am – 8pm on weekdays and 9am – 1pm on Saturdays

Email us at helpline@rnib.org.uk or say: "Alexa, call RNIB Helpline"

**RNIB Helpline**

The RNIB Helpline can refer you to an employment specialist for further advice and guidance. RNIB Helpline can also help you by providing information and advice on a range of topics, such as eye health, the latest products, leisure opportunities, benefits advice and emotional support.

Call the Helpline team on 0303 123 9999 or email helpline@rnib.org.uk

**7.2 Access to Work**

Access to Work is run by DWP. It provides advice, grant funding, and practical support to disabled people and employers to help overcome work related obstacles resulting from a disability. Further details are available at [www.directgov.uk](http://www.directgov.uk/)

**7.3 Guide Dogs**

The best place to find out information relating to guide dogs. Visit: [www.guidedogs.org.uk](http://www.guidedogs.org.uk)

**7.4 The Health and Safety Executive**

HSE is responsible for enforcing health and safety at workplaces. Visit: [www.hse.gov.uk](http://www.hse.gov.uk)

**7.5 Equality and Human Rights Commission**

The Equality and Human Rights commission have a statutory remit to promote and monitor human rights; and to protect, enforce and promote equality across the nine "protected" grounds - age, disability, gender, race, religion and belief, pregnancy and maternity, marriage and civil partnership, sexual orientation and gender reassignment. The website includes a section on employment.

<http://www.equalityhumanrights.com/>

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