

# Is your noise risk assessment up to scratch?

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It's probably fair to say that noise risks are not well understood by many industries and most lack the in-house expertise to carry out a good risk assessment without the aid of outside help, but how do you know that you're getting good value? How can you improve the in-house expertise so that you can at least keep the risk assessment up to date? Do you have the ability to manage the issue on a day to day basis?

Because noise risks are often regarded as difficult to deal with and the measurement equipment is relatively complex to use, most companies tend to turn to an outside agency to construct a risk assessment for them. Nothing wrong with that, but the quality of the final product varies enormously to the extent that some do not even satisfy the minimum standard required by the Control of Noise at Work Regulations 2005. So where's the evidence for this? In 2005 I was involved in a research project funded by the HSE, entitled "**Epidemiological evidence for the effectiveness of the noise at work regulations**" (HSE research report RR669) and my task was to visit a number of large manufacturing companies covering a wide range of sectors, to see how they complied with the Regulations. My background is in both consulting and enforcement, so I have a good idea of what to look for.

Bearing in mind that these companies were probably performing better than average in terms of noise risks, as they had volunteered to join the study, I was very surprised at the quality of the noise risk assessments they had in their possession. I visited 12 companies, and most failed to meet all of the requirements of the Regulations; two had no noise risk assessment at all and of the rest only two had risk assessments that I would regard as being satisfactory in all respects. Although the range of deficiencies was wide the most common included the lack of an action plan, actual noise exposures not being calculated, noise exposures not being related to workers, no health surveillance, and no advice on noise risk training of workers.

Frankly, I found this somewhat shocking, as did the participant companies because they had, in good faith, assumed that by employing outside expertise they were at the very least protected from further enforcement action or claims for noise induced hearing loss. So, how can you avoid falling into the same trap? The following is largely reproduced from the HSE Engineering Industry Noise Task Group guidance on the subject and I make no apologies for this, it contains good advice that is difficult to improve upon.

High noise exposure will eventually cause deafness, tinnitus and possibly other types of damage. Your basic duty under the Control of Noise at Work Regulations 2005 is to prevent or reduce risks to health and safety from exposure to noise at work. To do this you need to know who is at risk, and what the level of that risk is. In order to make a plan to tackle noise problems, you must know what is causing the risk (what processes, machines, etc) and the priorities for action.

The key to obtaining this information is the Noise Risk Assessment, which must be at least adequate, but how do you, as an employer, know what an *adequate* assessment consists of? It is up to the employer to take reasonable steps to satisfy himself or herself that the assessment meets the requirements of the regulations, even if the assessment is carried out by someone outside the company such as a consultant.

The checklist at the end of this article will help; it shows you what you should or could expect to see in three different standards of noise assessment, starting with the minimum legal requirement.

In brief, a noise assessment should:

- State whether you have a noise problem,
- Tell you which employees are at risk, and why,
- Give you enough information to let you prioritise and plan the work needed to control the risks,
- Let you know what to do about the immediate risk (hearing protection, warning signs),
- Help you to instruct, inform and train your employees about these issues.

There are some tell-tale signs that a noise assessment is *not* adequate, such as;

- Noise measurements don't relate to the jobs or tasks people carry out – they are simply spot readings taken around the workplace. This is a depressingly common problem!
- Noise exposures (LEP,d) are not quoted. These must relate to individual workers or groups of workers.
- No reference to legal duties (Control of Noise at Work Regulations 2005) or Action Values.
- No Action Plan.
- No advice on suitable hearing protection for individuals or groups.

Some noise assessments provide lots of information and whilst there is nothing wrong with providing extra detail, you should make sure that the assessment actually gives you at least the minimum legal information you need to carry out your duties. Extra information is worth having only if it further helps you to control and reduce the risks.

Checking the report to ensure it meets the minimum legal requirements is all well and good but we'd all agree that prevention is better than cure, so why not ensure you address this issue at the quotation stage? Any reputable consultant should be able to supply you with either a comprehensive schedule that clearly states what their report will provide or specimen reports, sanitised to remove the identity of the company to which it relates. If they can't or won't, move on to someone who will!

All of the above will help you to ensure you have an adequate noise risk assessment but don't forget that it should be reviewed if there is reason to believe that it is no longer valid (e.g. new machinery installed; change in working practices; layout of the workplace changed). Good practice would be to carry out an informal review every two years, to decide whether a full review is necessary. Even better, the review should be on-going with changes to machinery and working practices being evaluated for noise implications at the planning stage.

Many businesses could make significant long term savings in this respect if they carried out the process in-house, but this requires a level of expertise that is not necessarily widespread. However, the Institute of Acoustics, the UK's professional body for those working in acoustics, noise and vibration, offers an accredited training course specifically designed to bring candidates up to a competent standard, which will enable them to carry out basic noise risk assessments and keep existing ones up to date.

The **Certificate of Competence in Workplace Noise Risk Assessment** is offered at 10 centres in the UK, and the course aims to provide a recognised course of education and training to enable persons to carry out workplace noise assessments in a competent manner, as required by the Control of Noise at Work

Regulations 2005. Since the course was first run in 1989, more than 2000 people have gained the Certificate. With the introduction of the new Regulations in 2005, demand for competent noise exposure assessments is increasing and this course provides those attending with the latest information and training to meet the demands of the legislation. It is designed to provide a background of basic acoustics combined with 'hands on' practical experience of industrial noise measurements and associated assessment of workplace noise exposure.

Students take the Certificate at an Accredited Centre. Attendance at the Centre is usually for four days, plus the examination day, which includes a practical test. Examinations are currently held at the Centres twice per year, in Spring and Autumn. Most Centres run the course for the four days preceding the examination date. Further information regarding the course content and details of the training centres is available from the IoA website [www.ioa.org.uk](http://www.ioa.org.uk) or by phone 01727 848195.

Finally, it's important to recognise that the Noise Assessment is just the start of the process, not the end. Don't just file your assessment away. Use it to carry out your duties to reduce the risk of hearing loss and control noise exposure.

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### Noise Assessment Checklist

		<i>Adequate (Minimum legal requirement)</i>	<i>More than Adequate</i>	<i>First-rate</i>
<i>Purpose of assessment (legal basis)</i>			✓	✓
<i>Identification of those employees likely to be at risk of hearing damage (either names of employees, named groups of employees, or named tasks)</i>		✓	✓	✓
<i>Daily personal noise exposure (LEP,d) of those likely to be exposed at or above the first action level (calculated from levels of noise and times of exposure during working day)</i>		✓	✓	✓
<i>Levels of noise and times of exposure during working day used to calculate LEP,d</i>			✓	✓
<i>Peak noise exposure of those likely to be exposed at or above the peak action level</i>		✓	✓	✓
<i>Indication of employer's and employees' legal duties relevant to levels of exposure.</i>		✓	✓	✓
<i>Identification of sources of noise giving rise to the risk</i>		✓	✓	✓
<i>Summary of existing noise control measures</i>			✓	✓
<i>Comment on effectiveness of existing noise control measures</i>				✓
<i>Suggestions for priorities for control of noise (where necessary)</i>			✓	✓
<i>Hearing protection</i>	<i>State whether what is currently in use is adequate.</i>	✓	✓	✓
	<i>Suggestions for suitable alternatives.</i>	✓	✓	✓
	<i>Which areas require marking as 'Ear Protection Zones' (and correct sign to use)</i>	✓	✓	✓
	<i>Reference to criteria (BS EN 458) for selection of 'suitable' hearing protectors</i>			✓
<i>Name of person responsible for the assessment</i>		✓	✓	✓
<i>List of equipment used</i>			✓	✓
<i>Description of work activities assessed</i>		✓	✓	✓
<i>Photographs</i>			✓	✓
<i>Annotated sketch plans of work areas</i>			✓	✓
<i>Information on requirements for health surveillance (hearing checks) (where necessary)</i>			✓	✓
<i>Suggested noise control solutions</i>				✓
<i>Reference to and/or copies of relevant published noise control solutions (e.g. HSE industry-specific guidance)</i>			✓	✓
<i>Reference to and/or copies of general published guidance and information on noise (i.e. to facilitate training of employees).</i>		✓	✓	✓
<i>Employee training materials (e.g. a handout)</i>				✓
<i>Advice on low-noise purchasing policy</i>				✓
<i>Glossary of terms</i>			✓	✓