



**Briefing 12/07 February 2012**

# HSE guidance on hand-arm vibration exposure monitoring

To: All contacts in England, Wales, Scotland and Northern Ireland

<p>Key issues:</p> <ul style="list-style-type: none"><li>Guidance on HAVs</li><li>Compliments duty holders practices for managing HAVs</li><li>Vibration risk assessments recommended</li></ul>
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## 1. Background

Hand-arm vibration remains a significant health issue for local councils and public service providers. There remains a duty to look after the health of those employees using equipment which can have a detrimental effect on their health and this is especially relevant to those in services such as building, highways and grounds maintenance.

A copy of the guidance is found below.

HSE inspectors commonly come across companies that are engaged in routine continual monitoring or logging of workers' vibration exposure (e.g. using log books, in-line electrical and pneumatic timers, or more sophisticated electronic timers). It's a common theme of many queries to HSE, too.

The following Q&A for employers addresses why HSE advises that such monitoring is unlikely to be necessary.

### **Q. Must I continually monitor workers' exposure to vibration?**

A. No. There is no legal requirement for **continual** monitoring and recording of vibration exposure. To do so is probably not a good use of your or your employees' time, unless there are very specific circumstances.

What you *must* do is decide what workers' exposure is likely to be, as part of a vibration risk assessment. So a period of monitoring to understand how long workers use particular tools in a typical day or week may be necessary – if it helps you to do your risk assessment. Once you know enough about the work to say what the exposure is likely to be (and whether it is likely to exceed either the Exposure Action or Exposure Limit Value) your focus can shift to investigating, and taking, practical steps to reduce the exposure and the risks.

**Q. I'm using monitoring to make sure my workers keep below the Exposure Limit. Isn't that sensible?**

A. Just because your workers' exposure is below the Limit, it doesn't mean you have complied with the law, or done enough to protect workers' health. A fundamental requirement under the regulations is that exposure is reduced to 'as low as reasonably practicable'.

If your workers' exposure is regularly reaching the Exposure Limit Value, then you should be looking at doing the work in a different way. Restricting exposure to just below the Exposure Limit Value will still result in many workers developing hand-arm vibration syndrome (HAVS).

**Q. Why and when might it be helpful to have ongoing monitoring?**

A. If there are particular workers who, following medical advice, have restrictions placed on their vibration exposure, then it would be sensible to have a system in place to make sure that that restricted level was not being exceeded, although this does not have to be through ongoing monitoring. Another example might be for emergency work involving vibration exposure.

**Q. What about the 'tool timers' and 'vibration meters' that can be bought?**

A. There is nothing wrong with using these devices, it's just that there is not generally a need for one to be issued to every worker, or attached to every tool. As noted above, continual monitoring and recording of vibration exposure is not a requirement of the regulations, nor does HSE advise that it is a sensible thing to do on a routine basis.

It is worth noting that some devices that are sold as 'vibration meters' do not measure the vibration exposure of workers - they may only measure the amount of time that a tool is being used. So similar to a stopwatch (but a bit more expensive).

**Q. Our insurance company expects us to keep exposure records – why?**

A. Your insurance company should be able to tell you why it expects you to make and keep these records. As noted above, there is no legal requirement on continual monitoring, and HSE does not advise it on a routine basis. Your insurance company will rightly be concerned about its liability should your workers develop ill-health; you can show it what you are doing to minimise risks and prevent ill-health by means of your risk assessment and evidence of the practical actions you are taking.

**Q. So I've stopped continual monitoring. Now what?**

A. It's likely that you can put your monitoring data to some use. It may give you enough information to decide what individuals or groups of workers are at risk from vibration, either routinely or on an intermittent basis. Now look at the HSE guidance – INDG175 – and the information on the website [www.hse.gov.uk/vibration](http://www.hse.gov.uk/vibration). Take positive action to reduce the exposure and the risks – e.g. change the work process to avoid the need to use hand tools, modify the work to improve ergonomics, change to better tools with lower vibration and good ergonomic design, maintain and look after the tools and consumables, train your workers. Make sure that the action you take results in real changes – monitor your systems and make sure work instructions are being followed. Don't forget health surveillance for workers at risk, to pick up early signs of ill-health.

## 2. Health Surveillance guidance

The Health and Safety Executive provide information about health surveillance to help employers understand their responsibilities and act on them. Their guidance on this is below.

### Providing health surveillance

You must provide health surveillance for all your employees who, despite your action to control the risk, are likely to be regularly exposed above the Exposure Action Value or are considered to be at risk for any other reason. The purpose of health surveillance is to:

- Identify anyone exposed or about to be exposed to hand-arm vibration who may be at particular risk, for example people with blood circulatory diseases such as Raynaud's Disease;
- Identify any vibration-related disease at an early stage in employees regularly exposed to hand-arm vibration;
- Help you prevent disease progression and eventual disability;
- Help people stay in work;
- Check the effectiveness of your vibration control measures.

You should consult with your trade union safety representative, or employee representative, and the employees concerned before introducing health surveillance. It is important that your employees understand that the aim of health surveillance is to protect them from developing advanced symptoms of ill health so that they can continue to work. You will need their understanding and co-operation if health surveillance is to be effective.

### How can I arrange health surveillance?

Basic health surveillance consists of regularly seeking information about early symptoms of ill health by using a questionnaire. It may help you keep costs down if you carry out this function yourself, referring any positive responses to an occupational health service provider.

Alternatively, you could ask an occupational health service provider to provide a complete service on your behalf. You should be able to find details of occupational health service providers from your trade association, your local telephone directory, the internet or your nearest HSE office.

### What should I expect from an occupational health service provider?

A suitable occupational health service provider will have training and experience in health surveillance for hand-arm vibration.

They should be able to:

- Advise you on a suitable health surveillance programme for your employees;
- Set up the programme;
- Provide necessary training and supervision for staff who are helping with basic health surveillance;
- Provide suitably qualified and experienced staff to carry out the higher level health surveillance;

- Provide you with reports on your employees' fitness to continue work with vibration exposure.

What do I have to do with the results of health surveillance?

You will need to:

- Keep records of the health surveillance and fitness for work advice provided for each employee (but not the confidential medical records which are kept by the doctor). Your health and safety inspector is entitled to ask to see the health records as part of their checks that you are complying with these Regulations;
- Make employees' records available to them;
- Act upon any recommendations made by the doctor about employees' continued exposure to vibration;
- Use the results to review and, if necessary, revise your risk assessment, including your plans to control risks;
- Discuss any changes to your risk assessment with your trade union safety representative or employee representative;
- Notify the relevant enforcing authority when advised in writing by a doctor that an employee in listed occupations has HAVS or carpal tunnel syndrome, as required by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR).

### **3. Comment**

APSE has undertaken training and events highlighting the importance of addressing HAVs in the past and will continue to keep members up to date with developments such as this. The central message from the most recent guidance, that continual monitoring is unnecessary in most circumstances and that undertaking a vibration risk assessment is a far better approach, is a common sense way forward. The HSE Health Surveillance guidance above provides a basic approach to surveillance of the risks involved and further information is available on their website.

Some organisations will already be adopting the approaches highlighted by HSE whilst others should consolidate this guidance into their internal health and safety arrangements. It remains essential that councils and other public service organisations provide adequate training for employees, have specific risk assessments for tools and equipment and appropriate policies and procedures in place to ensure that HAVs, along other health risks, is treated with the significance it deserves.

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