

Vibration exposure monitoring Q&A

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 (see below).

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. 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.