

Benchmarks for occupational noise risk management



These benchmarks for noise risk management are derived from Finch Consulting's years of experience in helping businesses tackle noise at work. They address all those areas crucial for control of noise risk and prevention of harm. A business may check its performance or status against each of the benchmark statements, and use the criteria/positive indicators to identify any gaps or areas for further action.

1. Management/organisational arrangements

Benchmark: Management and organisational arrangements are in place for prevention of damage to workers' hearing, and management of relevant health and safety risks. The business demonstrates commitment through positive actions on noise/hearing conservation within a system for managing health and safety risks.

Criteria/Positive Indicators

- ☐ Policy on hearing conservation/noise risk management in place, with responsibility at appropriate seniority.
- ☐ Responsibilities for aspects of noise risk management are assigned to individuals/job roles, at appropriate level of authority.
- ☐ Competence of individuals within organisation, and external providers, to carry out relevant tasks and responsibilities is ensured.
- ☐ Control and reduction of noise is incorporated in machinery and equipment procurement arrangements (**asset management**), and workplace design processes.
- ☐ Noise risk assessment findings are under regular review, appropriate mechanisms in place to identify new/changed noise hazards and risks.
- ☐ Arrangements in place to keep up to date with changes in good practice in noise risk control, developing understanding of risks, preventive and protective measures.
- ☐ Appropriate data/indicators gathered via regular audit, used to measure performance, acted on as appropriate.
- ☐ Arrangements in place for liaison with other employers (e.g. clients, subcontractors) on policy, practices, hazard and risk information sharing.



2. Risk assessment

Benchmark: Noise risk assessments have been carried out; assessments were suitable and sufficient, and appropriate records have been made of the findings and actions required.

Criteria/Positive Indicators

- ☐ Risk assessments cover all potential areas/activities where a noise hazard may exist; based on observations of specific work patterns, tasks, practice.
- ☐ Records are kept of significant findings of risk assessments, measures taken and intended to be taken.
- ☐ Assessments include reliable estimates of employee noise exposure for comparison with Action/Limit Values in Regulations.
- ☐ Risk assessment used positively to drive implementation of preventive and protective measures.
- ☐ Consideration given in risk assessment to groups/individuals at particular risk.
- ☐ Actions required are identified, prioritised and recorded: control of exposure, personal hearing protection, instruction and training, etc.
- ☐ Actions identified in line with general principles of prevention / 'hierarchy of control', including prioritising collective measures over individual protection.



3. Control of exposure and hazard

Benchmark: Technical and organisational measures to control noise and noise exposures are in place. Noise exposures are controlled to ALARP (as low as reasonably practicable).

Criteria/Positive Indicators

- ☐ Technical and organisational control measures are demonstrably in place, or planned with timescale, or under review for reasonable practicability, as appropriate.
- ☐ General principles of prevention / 'hierarchy of control' are demonstrated in practice, including prioritising collective measures over individual protection.
- ☐ Good practice and industry standard control measures are identified and implemented (e.g. as per HSE guidance).
- ☐ Novel or bespoke control measures are actively identified and assessed.
- ☐ Workers/supervisors are aware of, and following/using systems of work/control measures.
- ☐ There is routine/preventive, and reactive, maintenance of noise control measures (**asset management**).



4. Personal hearing protection

Benchmark: Suitable personal hearing protection is selected, supplied to workers. Arrangements in place to ensure full and proper use of hearing protection as required.

Criteria/Positive Indicators

- ☐ Appropriate hearing protection selected taking account of relevant factors (including attenuation, type of work, other PPE, environmental factors, communications, individual needs), in consultation with workers.
- ☐ Hearing protection is actively supplied or made available to those workers who need it.
- ☐ Appropriate signage/systems supporting identification of areas/tasks where hearing protection required.
- ☐ Protection is worn, properly, as and when required; supported by information, instruction and training on use, care and maintenance.
- ☐ Supervision: supervisors know where and when hearing protection should be used, able to identify poor practice in fitting and use.



5. Workforce training and engagement

Benchmark: Workers are consulted on noise risk management. Workers are provided with appropriate information, instruction and training in noise risks, and have understanding.

Criteria/Positive Indicators

- ☐ Policies communicated to all workers and stakeholders affected.
- ☐ Individuals/roles requiring training identified, arrangements for including new starters, changing roles.
- ☐ Consultation ongoing on risks identified, preventive and protective measures proposed, health surveillance, and achievability and practicability of measures.
- ☐ Training delivered/refreshed to appropriate timescales.
- ☐ Content of training agreed, approved and recorded.
- ☐ Checks are made to ensure understanding.



6. Health surveillance

Benchmark: A programme of health surveillance is in place for workers whose hearing is at risk. Results of health surveillance are used to review control measures and further protect individuals.

Criteria/Positive Indicators

- ☐ Appropriate identification of individuals to include in programme.
- ☐ Baseline and regular audiometric screening to appropriate standards; opportunity taken for reinforcement of information/training.
- ☐ Arrangements for diagnosis by doctor or occupational health professional.
- ☐ Arrangements for support and management of individuals where hearing loss/damage identified.
- ☐ Health records are kept, separate from medical-in-confidence information.
- ☐ Feedback on group and individual (fitness for work, otherwise subject to confidentiality) results used to inform risk assessment and control practices.
- ☐ Employer has control/oversight of health surveillance arrangements, even if external provider is used.



Resources and Further Reading

HSE Controlling noise at work. The Control of Noise at Work Regulations 2005. Guidance on Regulations L108 (3rd edition, 2021)

HSE Managing for health and safety HSG65 (2013)

About the Author



Timothy Ward is a Consultant with over 35 years' experience in the field of noise and vibration, mostly in the investigation and prevention of occupational exposures associated with ill health, machinery safety, and noise as a safety issue. He advises businesses on protecting workers' health and safety, and essential health and safety requirements of work equipment, and provides expert evidence to the Court in related civil, criminal and commercial matters.