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1. Introduction

As a responsible employer Royal Holloway Students' Union (RHSU) is committed to the provision of an environment in which the risk of damage to employees hearing is reduced as far as practicable in accordance with the Control of Noise at Work Regulations 2005.

Noise is often defined as unwanted sound. Noise at Work can cause hearing damage that is permanent and disabling. This can be hearing loss that is gradual because of exposure to noise over time, but also damage caused by sudden, extremely loud noises. The damage is disabling as it can stop people being able to understand speech, keep up with conversations or use the telephone.

Hearing loss is not the only problem. People may develop tinnitus (ringing, whistling, buzzing or humming in the ears) a distressing condition which can lead to disturbed sleep and associated mental wellbeing concerns.

Noise at Work can interfere with communications and make warnings harder to hear, it can also reduce the person's awareness of their surroundings, thereby increasing health and safety risks, and potentially placing people at risk of harm or fatality.

The Regulations apply where work activities expose people at work (employees or contractors) to risks to their health and safety from noise. They do not apply where people who are not at work are exposed to risks to their health and safety from noise related to work activities; however the general duties of section 3 of the Health & Safety at Work Act 1974 may apply in such cases (notably the impact on the general public when present on or in close proximity to your premises).

In April 2008 the Regulations were adopted by the Music and Entertainment sectors. Music and Entertainment sectors are defined in the Regulations as all workplaces where live music is played or recorded music is played in a restaurant, bar, public house, discotheque, nightclub or alongside live music or a live dramatic or dance performance.

2. Employer Responsibilities

The Control of Noise at Work Regulations 2005 require that employers eliminate or reduce risks to health and safety from noise at work. Depending on the level of risk an employer is required to take action to reduce the noise exposure; and also provide employees with personal hearing protection.

The employer has further duties under the Regulations to:

- make sure the legal limits on noise exposure are not exceeded
- maintain and ensure the use of equipment provided to control / mitigate noise risks
- provide employees with information, instruction and training
- carry out health surveillance (monitor workers' hearing ability).

It is the duty of RHSU to assess the level of risk from noise in the workplace, responsibility is delegated to departmental line managers who are committed to regularly assessing the impact of noise and, where necessary, take action to mitigate noise and implement safe systems of work.

Noise Hazard Zones (Hearing Protection Zones) must be identified, and records maintained centrally with clear information and advice provided to employees who are tasked with working within the zones. Employees tasked in this way will be provided with hearing tests as part of Health Surveillance carried out by the organisation.

PPE will be provided for employees where extra protection is required above control measures implemented on noise generating equipment, or as a short-term measure while other methods of controlling the noise are being developed. Hearing protection is not an alternative solution to controlling noise by technical and organisational means.

3. Employees' Responsibilities

All employees have a duty to take reasonable steps to ensure that they do not expose or place themselves, or others, at risk due to noise in the workplace. They are expected to co-operate fully in complying with any procedures that may be introduced as a measure to protect the safety and well-being of our staff and visitors.

Where employees are able to control noise levels within the work place, they must be cognisant of other individuals who work in the same location, and be considerate of the impact changes in noise levels may have on those individuals. Employees working in music and entertainment spaces must be aware of the impact of noise on colleagues, visitors and the wider community; and must comply with operational controls implemented to monitor and manage noise.

It is the responsibility of all employees to be aware of the potential risks in their working area and the tasks requested. They must complete a visual assessment prior to commencement and raise any concerns immediately with their line manager. If an accident or near miss occurs the correct reporting procedure is to be followed, following RHSU's Accident/Incident Policy if necessary.

4. Noise Assessment & Reduction

A noise assessment should be completed whenever it is suspected that a noise problem exists, or where activity is known to have noise or noisy tasks associated with it. The assessment must be completed where:

- Noise is intrusive or worse than intrusive for most of the working day
- Employees have to raise their voices to conduct out a normal conversation when approximately 2m apart for a portion of the working day
- Employees use noisy powered tools or machinery for more than 30 minutes each day
- Activities are known to generate noise or have noisy tasks associated
- Noise occurs due to impacts or explosive sources such as cartridge-operated tools or detonators
- Warning sounders are used to avoid or alert employees to dangerous situations
- Working practices rely on verbal communications
- There is work around mobile machinery or traffic

The Regulations require employers to take specific action at certain action values. These relate to the levels of exposure to noise of your employees averaged over a working day or week; and the maximum noise (peak sound pressure) to which employees are exposed in a working day. These are:

Lower Exposure Action values

Daily or weekly exposure of 80dB (A)

Peak sound pressure of 135dB (C)

Upper Exposure Action values

Daily or weekly exposure of 85dB (A)

Peak sound pressure of 137dB (C)

There are also levels of exposure which must not be exceeded:

Exposure limit values

Daily or weekly exposure of 87dB (A)

Peak sound pressure of 140dB (C)

These exposure limit values take account of any reduction in exposure provided by hearing protection. The noise assessment should determine which (if any) of these levels are exceeded within the work place and appropriate action must be taken.

Where there is a risk from noise exposure, noise should be eliminated at source or, where this is not reasonably practicable, reduced to as low a level as is reasonably practicable. If, after engineering improvements noise levels remain above the lower exposure values, further action will be required.

Where the lower exposure action value is met or exceeded hearing protection (ear plugs or defenders) must be available upon request. It is not compulsory for an employee to wear the protection available, but it must be available for their use.

Where the upper exposure action value or the exposure limit values are met or exceeded hearing protectors must be supplied and employees must wear them. Use of hearing protection must be enforced by the employer. Hearing protection zones must be created, clearly sign-posted (in accordance with Health & Safety (safety signs and signals) Regulations 1996) and employees must wear protection when within these zones. Health Surveillance must be provided to employees who are expected to work within these zones, which must include hearing tests.

There are many ways of reducing noise and noise exposure. It is within the capabilities of RHSU to decide on practical, cost-effective actions to control noise risks. The primary solution in all occasions is to remove the risk entirely, where this is not practicable the following measures should be considered:

- i. Using quieter equipment or an alternative quieter process
- ii. Engineering / technical controls to reduce, at source, the noise produced
- iii. Using screens, barriers, enclosures and absorbent materials to reduce the noise directed at employees
- iv. Designing and laying out the work place to create quiet work-stations
- v. Improving techniques to reduce noise levels
- vi. Limiting the time employees spend in noisy areas
- vii. Implementing a low-noise procurement policy for new / replacement equipment. The Supply of Machinery (Safety) Regulations 1998 require that a supplier provides information about the noise equipment produces, and the operating conditions under which the noise was measured.
- viii. Ensuring adequate maintenance for machinery and equipment that accounts for noise

5. Music & Entertainment

The Control of Noise at Work Regulations 2005 were adopted by the Music and Entertainment industry in 2008. Additional guidance was published to support the industry 'Sound Advice' which recognised the unique noise generating circumstances within the industry.

The noise generated with music and entertainment venues regularly exceeds exposure limit values, and generally sits above the upper exposure action values. The amplified equipment installed in RHSU venues is limited to ensure control for all noise generation is retained within management control, removing the potential for excessive noise to be generated. These limiters are pre-set at 105dB at source.

Unamplified music can be performed at levels which exceed the exposure limit, with orchestras able to generate 90-95dB for some performances.

Workers (employed or contracted) are required to operate equipment within the pre-defined noise limits, and to comply with the instruction to wear hearing protection at all times when inside a hearing protection zone.

Where performances, amplified or not, are hosted external to buildings or venues the same processes and regulations apply. The nature of these performances require temporary staging and equipment to be installed, which must be done in compliance with the regulations, completed by competent persons, with noise equipment tested and limiters activated prior to use.

Music and Entertainment venues are open for public use, and where the public are able to access these venues, they do so voluntarily, an informed choice. The public must be informed of the noise exposure risk when entering these venues, should be allowed to bring personal hearing protection or be able to purchase / obtain hearing protection on entry to the venue.

RHSU is aware that noise generated by music and entertainment within its operations, indoor or outdoor, has the potential to disturb the wider community. The organisation undertakes a number of measures to mitigate noise egress from the music and entertainment activities, these are:

- i. Installation of noise limiters on all amplified equipment
- ii. Monitoring of noise levels within music and entertainment venues
- iii. Monitoring of noise levels outside music and entertainment venues
- iv. Community monitoring of noise levels when music and entertainment venues are operating
- v. Provision of a direct contact for noise complaints
- vi. Liaison with local authority to agree exposure limits and noise management plans

6. Training

Employees are provided with training so that they understand the risks they may be exposed to, and their duties and responsibilities. Where they are exposed above the lower exposure action values they are informed of the likely noise exposure and the risk to hearing that creates, and the measures taken by RHSU to control the exposure and risks.

Employees must be instructed on the use of sound equipment, including how to identify and report defects, as well as where to obtain hearing protection and the appropriate use of such equipment. They must be informed of their duties under the Noise Regulations, specifically in regard to use of hearing protection and safe use of equipment, and be made aware of the Health Surveillance systems offered by RHSU.

7. Health Surveillance

RHSU provides Health Surveillance for all employees who are likely to be frequently exposed above the upper exposure action values, or are at risk for any reason – ie. They already suffer from hearing loss or are particularly sensitive to hearing damage. Health Surveillance usually means regular hearing checks, conducted annually for the first two years of being exposed and then at three-yearly intervals (although this will be more frequent if a hearing problem is detected or where the risk of hearing damage is high).

Hearing checks must be carried out by a competent person with the appropriate training – doctor, nurse or audiologist. The outcomes of such checks should be shared with RHSU (subject to individual consent) so that any action can be taken to mitigate further risks to employees. Records should be maintained of checks completed and actions undertaken, however no confidential information should be included.

8. Monitoring

The implementation of this Policy will be monitored at departmental level with any accidents, incidents or near misses being recorded and reported centrally.

The CEO will produce annual accident/incident statistics which will be circulated to the Board of Trustees and Health & Safety Committee. Such reports will facilitate a critical review of trends and necessary corrective action.