

August 2012



An Garda Síochána Hearing Conservation Programme

Version 1.1

Ráiteas Misin/ Mission Statement:

Ag obair le Pobail chun iad a chosaint agus chun freastal orthu/Working with Communities to Protect and Serve

B10/53/10

	<p>An Garda Síochána Policy Directive</p>
<p>Policy Title</p>	<p>An Garda Síochána Hearing Conservation Programme.</p>
<p>Policy Owner</p>	<p>Executive Director, Human Resources and People Development</p>
<p>Cancellations, amendments and associated documents</p>	<p>The following Code Chapters are hereby amended – 5.19 & 5.20.</p>
<p>Approving Authority</p>	<p>The Garda Commissioner.</p>
<p>Policy Author/s</p>	<p>Garda Hearing Conservation Group.</p>
<p>Compliance</p>	<p>This policy has been evaluated and is considered, so far as is reasonably practicable, to be compliant with constitutional, human rights and Irish legislation.</p>
<p>Commencement date</p>	<p>This policy will take effect on the 3rd August, 2012.</p>
<p>Previous review</p>	<p>This policy was last reviewed on 11th December, 2015.</p>
<p>Future review date</p>	<p>This policy shall be reviewed annually.</p>
<p>Version Control</p>	<p>Version 1.1.</p>

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Hearing Conservation Programme within An Garda Síochána

1. Introduction

The purpose of this document is to assist An Garda Síochána and its designated employers (i.e. Chief Superintendents and Senior Civilian Managers) understand what they need to do to comply with the legislation and how they can protect their employees from exposure to high levels of occupational noise. It will also be utilised as a reference document by employees, Regional Safety Advisers, the Chief Medical Officer, the Garda Occupational Health Service, appointed Divisional Inspectors assisting Chief Superintendents / Senior Civilian Managers on health and safety, personnel who have attended safety statement/risk assessment training and Safety Representatives.

All Garda management/supervisors and employees are required to comply with the policy contained in this hearing conservation programme.

2. Policy

It is the policy of An Garda Síochána to comply with relevant legislation, specifically the Safety, Health and Welfare at Work (General Application) Regulations 2007, (Control of Noise at Work), and in so far as is reasonably practicable to implement effective practices to reduce the risk of occupational noise exposure to employees and prevent the possibility of noise induced hearing loss.

A Garda Hearing Conservation Group (GHCG) has been established on a permanent basis. Composition of GHCG is made up of personnel/representatives from the following sections/agencies:

- Health and Safety Section, Human Resources and People Development;
- Chief Medical Officer, Garda Occupational Health Service;
- Executive Director of Finance & Services, Procurement Section;
- State Claims Agency;
- Health and Safety Authority;
- Director of Training and Development;
- Risk Management Unit, Strategic Transformation Office;
- Garda Professional Standards Unit;
- Head of Legal Affairs.

The GHCG will be responsible for:

- Reviewing and developing the An Garda Síochána Hearing Conservation Programme, for approval by Garda management;
- Assisting Garda management/supervisors in reviewing noise risk assessment reports and approving action plans for the implementation of controls;
- Conducting programme evaluations.

Health & Safety Section will act as co-ordinator for the Garda Hearing Conservation Group. This Group will meet on an annual basis or more frequently if the need arises.

2.1 Elements of the Garda Síochána Hearing Conservation Programme

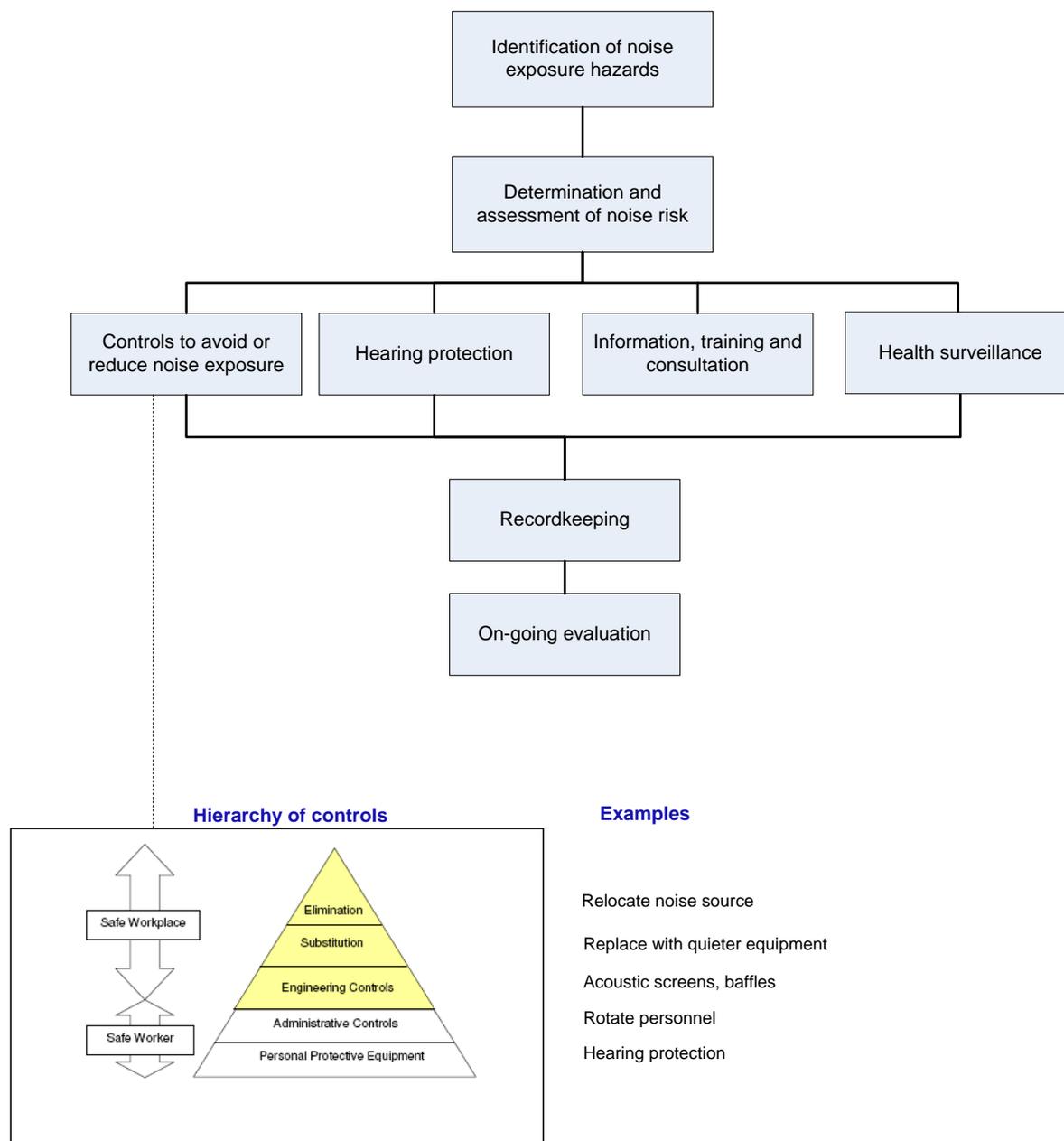


Figure 1: An Garda Síochána Hearing Conservation Programme

The following sections describe each of these elements in more detail and the required procedure.

Please note that reference to noise in this document relates exclusively to occupational noise within An Garda Síochána.

3. Identification of noise exposure hazards

3.1 Occupational noise hazards identified

Occupational noise risk assessments have identified the following Garda work activities where potential high levels of occupational noise can occur:

- Firearms/Training
- Motorcycle Duty
- Garda Dog Unit
- Garda Band
- Garda Water Unit
- Garda Air Support
- Policing at Concerts/Sporting Events
- TETRA/Digital Earpiece
- Communications Rooms

The above areas have been independently assessed by a competent person and noise assessment reports are on file.

Noise reduction controls will continue to be implemented in accordance with the recommendations of the reports provided by the competent person and any future changes in legislation.

3.2 Identifying possible ‘new’ noise hazards

If concerns arise in relation to other work areas/activities where there is potential to expose employees to high noise levels, then local management/supervisors will carry out a preliminary evaluation. The checklist in **Appendix 1** will be used as an aid for this purpose. If the noise is confirmed as an issue then a local risk assessment must be conducted by local management/supervisors.

4. Determination and Assessment of Noise Risk

4.1 Conducting a local noise risk assessment

Local Management/Supervisors should consult the generic noise risk assessment that is available on the Garda Portal and complete a local (site-specific) occupational noise risk assessment.

The local risk assessment will identify possible control measures to reduce the level of noise. If control measures cannot be implemented immediately, then it may be necessary for people to wear hearing protection as an interim measure.

The local risk assessment may identify that a more detailed risk assessment is required, to be carried out by a competent person.

See example in **Appendix 2**.

4.2 Noise risk assessment (by a competent person) and required follow-up

The following procedure applies to all workplace or activity-based noise risks, with the exception of events such as sports events and concerts for which a separate procedure exists.

1. Chief Superintendents/Senior Civilian Managers should engage a competent person to conduct a noise risk assessment using the noise exposure assessment specification that is available from Procurement Section, Garda Headquarters. Prior to engaging with a competent person, the Regional Safety Adviser should be consulted.
2. The assessment, including data collection and monitoring, is conducted by the competent person and a draft noise risk assessment report is provided to local management. The main points that the consultant's noise risk assessment report shall address are:
 - determination of noise exposure levels relative to the various regulatory limits;
 - the number of people exposed;
 - the adequacy of current controls;
 - hearing protection and recommendations for further noise controls;
 - training;
 - requirement for health surveillance (hearing checks).

The report shall also include a *Summary Noise Risk Assessment* (see example **Appendix 3**) for insertion into the local safety statement. The *Summary Noise Risk Assessment* will be in the same format as the Garda pro-forma and contain the reference details for the competent person's report.

3. The report will be forwarded to Health and Safety Section, which will distribute the report to the Garda Hearing Conservation Group for its review. Other stakeholders may be consulted during this review process.
4. When all feedback is obtained, Chief Superintendents/Senior Civilian Managers will agree the final content with the consultant/competent person.
5. Chief Superintendents/Senior Civilian Managers will forward copies of the final report to the local Regional Safety Adviser and Health and Safety Section, Human Resources and People Development, Garda Headquarters. Health and Safety Section will also forward a copy of this documentation to the Chief Medical Officer and the State Claims Agency.
6. Chief Superintendents/Senior Civilian Managers will file the *Summary Noise Risk Assessment* in the local safety statement, in place of the previous site-specific version. Alternatively integrate the *Summary Noise Risk Assessment* into the relevant task or activity-based risk assessment.
7. Where further controls have been identified in the competent person's report, Chief Superintendents/Senior Civilian Managers will agree and assign detailed actions, responsibilities, target dates for implementation and also progress review dates.
8. Chief Superintendents/Senior Civilian Managers will update the *Summary task/activity Noise Risk Assessment* with these details and as the actions are implemented. See **Appendix 3**.
9. Chief Superintendents/Senior Civilian Managers will review progress with the implementation of controls on a regular basis, for instance at Safety Committee Meetings.

5. Controls to avoid or reduce noise exposure

5.1 Hierarchy of controls

The occupational noise risk assessment report will prioritise safety controls according to the hierarchy of noise controls as illustrated in the following figure:

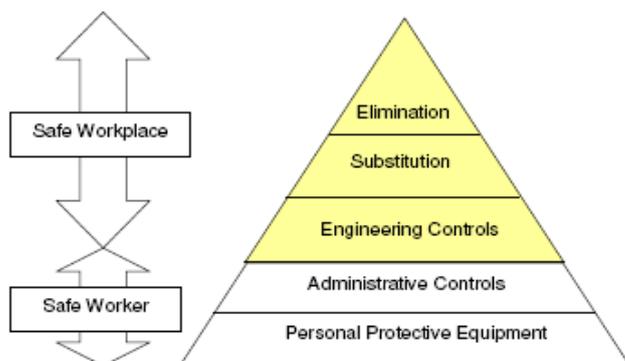


Figure 2: Hierarchy of noise exposure controls

The Chief Superintendent/Senior Civilian Manager has responsibility for implementing the recommendations and controls according to the occupational noise risk assessment conducted by a competent person. Progress with implementing these will be monitored locally.

As indicated previously, the *Summary Noise Risk Assessment* shall be updated as controls are implemented. Further measurement or monitoring may be required to verify the effectiveness of the controls implemented. This will have been agreed as part of the report review.

The elimination, substitution or engineering controls will take priority. However, where this is not possible then the following controls will be implemented:

- Training and educating staff;
- Provision of hearing protection to staff;
- Safety signage;
- Provision of health surveillance (audiometric tests/hearing checks);
- Repeat occupational noise risk assessment by competent person.

5.2 Purchase of new equipment

The process of procuring new equipment will take into consideration noise levels and preference will be given to equipment with lower output levels, providing all other operating criteria are met. The Garda Hearing Conversation Group will provide input to the development of a specification for the equipment, in conjunction with the Garda Procurement Section, where relevant.

6. Hearing Protection

Hearing protection may be required as an interim solution whilst awaiting implementation of more permanent controls. It may also be required if other controls cannot be utilised. If new hearing protection is being sourced, employees should be involved in the selection process. All hearing protection must be suitable to deal with the noise exposure levels and frequencies. Hearing protection selection should consider the need to hear warning signals, speech intelligibility, as well as any medical conditions. The comfort and fit to the user also needs to be considered.

The site specific risk assessment will specify the type of hearing protection that is to be used as determined by the competent person's noise assessment report.

Procurement Section will maintain records of all hearing protection specifications.

7. Information, Training and Consultation

All personnel identified in the risk assessment shall be given appropriate information and training.

The Safety, Health and Welfare at Work (General Application) Regulations 2007 (Control of Noise at Work) specify topics to be included when providing information and training to employees as outlined below:

1. The nature of the risks to hearing
2. Noise control measures
3. Exposure limit values and action values
4. The results of noise exposure survey, with explanation of the noise assessment
5. The correct use of hearing protection
6. Recognising hearing damage
7. Health surveillance
8. Safe working practices to minimise exposure to noise

Standard training programmes will be developed and provided by Chief Superintendent, Director of Training & Development, in co-operation with local management, Health & Safety Section, the Garda Hearing Conservation Group and the Chief Medical Officer.

Local management/supervisors shall ensure that induction training and information is provided to employees on commencement/allocation to any Section/Unit, in particular, where there is potential for employees to be exposed to high noises levels (e.g. to those areas listed at 3.1 above).

The Garda Occupational Health Service will also instruct employees in the correct use and care of ear protection on the occasion of Garda personnel attending for associated health surveillance (audiometric testing or hearing checks) at the Section.

8. Health Surveillance

Health surveillance (audiometric testing/hearing checks) will be provided for all employees who are likely to be regularly exposed to noise above the lower exposure action values, or to those employees who are at risk for any reason, for example, if they already suffer from hearing loss or are particularly sensitive to damage. This will be identified in the risk assessment.

The purpose of hearing checks is to:

- Warn when employees might be suffering from early signs of hearing damage;
- Provide an opportunity to do something to prevent the damage getting worse;
- Check that control measures are working.

Audiometric tests/hearing checks will be carried out in accordance with the Health and Safety Authority guidelines (See 'References' section), in particular:

1. Initial audiometric test prior to deployment to a role involving significant noise exposure;
2. A second audiometric test conducted within a year of initial screening;
3. Thereafter at recommended intervals not greater than 3 years;
4. Or at a higher frequency of testing when a medical concern arises.

8.1 Arranging Health Surveillance

Health surveillance is organised in consultation with the Chief Medical Officer, Garda Occupational Health Service, Garda Headquarters. Chief Superintendents/Senior Civilian Managers will forward a list of employees who have been identified in the noise risk assessment as being regularly exposed to noise exceeding the lower exposure action value. Local management will also forward a copy of the current summary noise risk assessment conducted by the competent person.

The Garda Occupational Health Service will be responsible for scheduling repeat audiometric tests/hearing checks and they will contact Garda personnel through their local management to make an appointment for an audiometric test/hearing check.

8.2 Results of Health Surveillance

The Chief Medical Officer will inform employees of the results of their health surveillance.

Chief Superintendents/Senior Civilian Managers must:

- Act upon any recommendations made by the Chief Medical Officer, Garda Occupational Health Service, about employees' continued exposure to noise;
- Based on the recommendations of the Chief Medical Officer, review and, if necessary, revise risk assessments and plans to control any potential risk.

9. Recordkeeping

Pertinent documentation and records shall be maintained. This is necessary to manage the An Garda Síochána Hearing Conservation Programme and provide proof of compliance with legal requirements. The list below outlines the optimal documentation and records that shall be maintained and by whom.

Type of Documentation	Ownership
Policy for the An Garda Síochána Hearing Conservation Programme	Health & Safety Section
Garda and external consultants risk assessments	Local Management
Health surveillance	Garda Occupational Health Service
Training, instruction and information given to employees	Local Management Director of Training & Development
Records of hearing protection issued if relevant	Procurement Section Local Management
Purchasing specification for equipment (which might generate noise), and specifications for hearing protection.	Procurement Section

Note: Superseded versions of all documents shall be archived as they may be required for reference in the future.

10. Ongoing Evaluation

The Garda Hearing Conservation Group will review the following on an ongoing basis:

- Legislative requirements;
- Safety statement and risk assessments;
- Hearing check results and trends;
- Reports and feedback from audits;
- Consultation and feedback from employees, local management or Regional Safety Advisers.

Records of such evaluations will be kept.

The programme will be evaluated by the Garda Hearing Conservation Group on an annual basis or within a reasonable time frame following changes in legislation.

11. References

- Safety, Health and Welfare at Work (General Application) Regulations 2007, S.I. 299 of 2007, as amended.
- Guide to the Safety, Health and Welfare at Work (General Application) Regulations 2007. Chapter 1 of Part 5; Control of Noise at Work. December 2007. Health and Safety Authority.
- The Noise of Music. Sound advice for the music and entertainment sectors. Guidance on how to comply with the Safety, Health and Welfare at Work (General Application) Regulations 2007. 2009. Health and Safety Authority.
- Guidelines on Hearing Checks and Audiometry Under the Safety, Health and Welfare at Work (General Application) Regulations 2007, Control of Noise at Work. 2007. Health and Safety Authority.

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Appendix 1

Noise Hazard Identification Checklist

Station/Section:	Conducted by:
Area/Activity:	Conducted by:

“Yes” to any of the following items indicate a need for detailed noise assessment.

Items to be checked	Yes	No	Remarks
1. Is the workplace noise intrusive – (e.g. Concerts, Garda Band or a Motorcycle duty) for most of the working day?	<input type="checkbox"/>	<input type="checkbox"/>	
2. Do your employees have to raise their voices to carry out a normal conversation when about 2 m apart for at least part of the working day?	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are employees exposed to sources of high levels of noise for most of the working day?	<input type="checkbox"/>	<input type="checkbox"/>	
4. Do your employees use noisy equipment for more than half an hour each day, such as: a. powered vehicles or machinery (motorcycles, helicopters, motor boats, grounds maintenance equipment) b. musical instruments	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are there noises due to impacts such as pneumatic impact tools or explosive sources such as cartridge operated tools, detonators, or guns?	<input type="checkbox"/>	<input type="checkbox"/>	
6. Do employee’s duties require them to be present at concerts or sporting events for considerable periods of time?	<input type="checkbox"/>	<input type="checkbox"/>	
7. Is there noise exposure from other sources such as barking dogs?	<input type="checkbox"/>	<input type="checkbox"/>	
8. Does any machine or equipment used in the work area or activity contain a warning from the manufacturer that noise levels generated by the machine or equipment can exceed 85 dBA?	<input type="checkbox"/>	<input type="checkbox"/>	
9. Is there any feedback from employees regarding experiencing any difficulty with hearing over the course of their work? (The reduction in hearing can also occur after work.)	<input type="checkbox"/>	<input type="checkbox"/>	
10. Do any of the employees experience any of the following conditions: a. Ringing in the ears; b. Each ear detect sound of a different tone; c. Muffled hearing?	<input type="checkbox"/>	<input type="checkbox"/>	
11. Have any of your employees made a claim for noise-induced hearing loss (NIHL)?	<input type="checkbox"/>	<input type="checkbox"/>	
12. Has the Chief Medical Officer made any recommendations arising from audiometric tests that were conducted on your employees?	<input type="checkbox"/>	<input type="checkbox"/>	

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Appendix 2

Example of local noise risk assessment (initial)

<u>RISK ASSESSMENT - NOISE - BANDROOM</u>					
Company Name <u>GARDA SIOCHANA</u>		Assessment undertaken by Garda Band, Garda HQ, Dublin 8			
Signed: <i>AN Other</i> Date: <i>01/12/2005</i> Assessment review date: <i>01/12/2006</i>		Countersigned: <i>BN Other</i> Approved: <i>CN Other</i>		Supt./Insp./Sgt. C/Supt./Supt	
List hazards and risks here:	List groups of people especially at risk from the significant hazards which you have identified:	List required controls here or note where the information may be found:	Person Responsible	Date Rectified	By whom
Hazards – Noise Risk – Noise-induced hearing loss. The risk is potentially >85dB (A) Lex, 8hr.	Band members Conductors Visitors	<p><u>Controls in place</u></p> <ul style="list-style-type: none"> A record of time spent rehearsing is kept near the stage and is maintained by all conductors. Industry-standard adjustable (i.e. Music Safe) ear-plugs have been issued to all Garda band members. Training in the use of these ear-plugs was provided by the manufacturer. All members, particularly the musical director and supervisory ranks keep abreast of new developments in hearing protection technology and investigate the adoption of same. All members undergo audiometric testing in the first year of service in the Garda Band, and at least every year thereafter. Supervisors monitor the implementation of the above controls. <p><u>Further controls or actions required</u></p> <ul style="list-style-type: none"> Progress with upgrade of Bandroom to include acoustic insulation and segregated practice areas. Carry out full noise risk assessment (by competent person) to determine exposures and any further controls required. 	Chief Superintendent Superintendent Inspector Sergeant Gardaí/Band Members		

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Appendix 3

Example of Summary Noise Risk Assessment, updated based on competent person's report, with all recommended controls implemented.

<u>RISK ASSESSMENT - NOISE - BANDROOM</u>					
Company Name <u>GARDA SIOCHANA</u>		Assessment undertaken by			
Garda Band, Garda HQ, Dublin 8.		Reference: Sound Consulting Report No. 1234 October 17 th 2008			
Signed <i>AN Other</i> Date <i>01/03/2009</i>		Countersigned <i>BN Other</i>		Supt./Insp./Sgt.	
Assessment review date: <i>01/06/2009</i>		C/Supt./Supt <i>CN Other</i>			
List hazards and risks here:	List groups of people especially at risk from the significant hazards which you have identified:	List required controls here or note where the information may be found:	Person Responsible	Date Rectified	By whom
Hazards – Noise Risk – Noise-induced hearing loss. Significant risk: Lex,8h dB(A) > 87 dB(A), that is above the exposure limit value. The lower peak action value of 135 d(b) was not exceeded. Levels vary depending on music played and location of various instruments	Band members Conductors Visitors	<u>Controls in place</u> <ul style="list-style-type: none"> Bandroom refurbished in 2006, to include acoustic panelling on the internal walls to dampen noise levels within the Bandroom. The Bandroom contains two individual practice booths and two larger practice rooms capable of accommodating small ensembles. These are sound proofed and noise-dampened to recording studio standards. Members are encouraged to use these for their individual practice. For Bandroom rehearsals, a stage seating plan has been devised in order to minimise exposure to some louder instrumental sections. This plan is displayed on the wall behind the stage. Members are encouraged to moderate their volume of playing in consideration of other players. A record of time spent rehearsing is kept near the stage and is maintained by all conductors. Band members who are not required for a particular rehearsal/session have been instructed to move to a noise free environment. 	Chief Supt./Supt. Chief Supt./Supt. Inspector, Sergeants & Band Members Inspector & Band Members Band Members Inspector & Band Members		

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		<ul style="list-style-type: none"> • Safety signage is also prominently displayed instructing all band members to wear their ear protection. • Industry-standard adjustable (i.e. Music Safe) ear-plugs have been issued to all Garda band members. In addition to this, a number of sets of ear-muffs have been provided for members for rehearsal purposes. • Training in the use of these ear-plugs was provided by the manufacturer by way of a seminar in the Bandroom, after which the ear plugs were issued • All members, particularly the musical director and supervisory ranks keep abreast of new developments in hearing protection technology and investigate the adoption of same. <p>All members undergo audiometric testing in the first year of service in the Garda Band, and at least every year thereafter. Members in whom hearing loss was established following an audiogram are tested more frequently as directed by Garda Occupational Health Service (GOHS). Audiometric testing is carried out at the GOHS, who send results to the Garda Band administration office. These results indicate the maximum length of time which may elapse before each member's next test or hearing check.</p> <ul style="list-style-type: none"> • Supervisors will monitor the implementation of the above controls. <p><u>Further controls or actions required</u> None identified.</p>	<p>Inspector, Sergeants</p> <p>Inspector, Sergeants</p> <p>Chief Supt/Supt & Inspector</p> <p>Inspector, Sergeants & Band Members</p>		
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