

**Ian Prosser**  
Chief Inspector



22 October 2018

Open Public Letter HAVS

Dear Sir/Madam

ORR is concerned about the ~ 100 RIDDOR cases of Hand-Arm Vibration Syndrome (HAVS) and Carpal Tunnel Syndrome reported to us each year. This includes new cases and those individuals where their HAV condition has worsened. The ORR's health and safety inspectors are investigating reported cases of worsening HAVS to establish information on the individual's job, the use of power hand tools and extent of exposure, and importantly the action taken to protect the individual. We are asking duty-holders to ensure they have robust arrangements and doing all that is necessary to manage the risk from vibration. ORR is keen to support greater use of technology, automation or mechanisation that eliminates or reduces individuals' exposure.

We have been asked to clarify our position on the use of wearable or off-tool continuous monitoring technology when developing a HAV risk assessment. While it can usefully support a risk assessment and can be a check on controls, we want to see duty-holders maintain a strong focus on control of hand arm vibration through elimination, reduction, and engineering methods. There is no legal requirement for continuous vibration exposure monitoring.

Where a duty-holder chooses to use off tool continuous monitoring technology they should be aware of latest [HSE advice on continuous monitoring](#). Use of such data may be useful in supporting a HAV risk assessment by, for example, identifying whether a particular type of tool or way of working is likely to result in higher vibratory exposures. This enables a duty-holder to target and verify improved HAV controls.

For non-rail specific health and safety issues ORR normally follows [HSE policy and guidance](#). This requires accordance with the requirements of BS EN ISO 5349-1:2001.

ORR is aware of research, such as that conducted by the [Institute of Occupational Medicine](#) that highlights a possible correlation between measurement data from on-tool and wearable technology, however validation of new measurement technologies is undertaken by academic peer review and international standards committees and not by the ORR. We are also aware of the amount of money that some companies are committing to continuous or on-going monitoring, and the extent of effort required to



analyse the resultant data. It is a question of balancing cost and effort on measurement with a proportionate level of effort on controlling risk. We re-iterate that the legal duty is to control risk i.e. avoiding exposure to hand-arm vibration so far as is reasonably practicable. We encourage the development and application of technology to assist in the assessment and control of hand-arm vibration, but our over-riding expectation is that risk should be adequately controlled in line with the Control of Vibration at Work Regulations 2005.

Yours faithfully



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