

HEALTH AND SAFETY

SAFETY POLICY & ARRANGEMENTS



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Subject: **Personal Protective Equipment (PPE)**

Introduction

This document forms part of the National Ice Centre's organisational written safety policy arrangements.

Departments, services or teams may consider it appropriate to develop additional guidance and systems of work on specific work related activities.

Where proposals, additional guidance or changes to systems of work will have an impact on health, safety and welfare, this will be discussed and agreed at the Health & Safety Committee.

If you have any questions or require further information or support on the contents of this document, please contact The NIC Health & Safety Advisor or Corporate Safety Advice.

Overview Of Management & Colleague Responsibilities

Manager Responsibilities

Below is an overview of the responsibilities which is intended to support managers in identifying their key duties that need to be taken to comply with the requirements of this document and the safety management systems of the National Ice Centre.

- Managers must ensure that all other reasonably practicable control measures been considered and implemented before resorting to the use of PPE
- Manager must undertake, where a significant risk is present, a appropriate risk assessment of the activity or substance has been undertaken which identifies what specific PPE is to be utilised and that the contents of that assessment are formally discussed with those affected colleagues
- Managers need to ensure that the PPE has been formally issued to colleagues and that there are suitable records of the provision of PPE to individual colleagues
- Managers need to be satisfied that the correct type of PPE is used which is specified within the risk assessment and/or written 'Safe System of Work'.
- Managers need to ensure that the needs of colleagues both as a group and individual needs have been taken into account
- Managers must be able to demonstrate that all colleagues have been provided with relevant information, instruction and training on the correct use, storage and care of PPE they use
- Managers must ensure that when PPE is not available, colleagues have been given clear instructions on where PPE can be obtained from and what their responsibilities are whilst it is not available and implement appropriate arrangements for colleagues to obtain replacement.
- Managers must monitor and implement an appropriate formal system for maintaining PPE and ensure that you monitor colleagues to ensure the correct use of PPE

Employee Responsibilities

The Personal Protective Equipment at Work Regulations place duties on employers to take reasonable steps to ensure that PPE provided is properly used. The Regulations also place the following duties on employees:

- PPE must be worn and used in accordance with the instructions provided to them.
- Employees must take all reasonable steps to ensure that PPE is returned to the accommodation

provided for it after it has been used (unless the employee may take PPE away from the workplace e.g. footwear or clothing).

- PPE must be examined before use.
- Any loss or obvious defect must be immediately reported to their supervisor.
- Employees must take reasonable care for any PPE provided to them and not carry out any maintenance unless trained and authorised (see 'maintenance').

Where colleagues are issued with PPE for a specified activity or work location, the employee shall wear it and it is their responsibility.

If it is not worn for the specified activity, disciplinary action can be taken.

Where the PPE has been issued and is not available or is defective, the employee must report that their manager and the work must not be undertaken until the PPE is available for use.

This matter considers issued PPE and is not relevant for suitable work wear.

The Health & Safety at Work Act 1974 section 7 requires all employees to consider their own health & safety and the safety of others.

As an employee of the National Ice Centre, if you have concerns in relation to health & safety that is likely to cause you or someone else, injury or ill health then you must ensure that the concern is communicated to your manager immediately.

You are also required to co-operate with the management of the National Ice Centre to ensure compliance with the health & safety arrangements, policies and procedures and work to the requirements identified within this document.

What Is Defined As 'Personal Protective Equipment'

PPE is defined within the Personal Protective Equipment at Work Regulations 2002 as:

'All equipment (including clothing affording protection against the weather) which is intended to be worn or held by a person at work which protects them against one or more risks to their health and safety'.

PPE will specifically include equipment such as; safety footwear, hard hats, high visibility waistcoats, goggles, life jackets, respirators, safety harnesses, etc.

PPE can also cover waterproof, weatherproof or insulated clothing where its use is specifically required to protect colleagues against adverse climatic conditions that could otherwise materially affect their health and safety.



It is important to differentiate between PPE and appropriate clothing / equipment.

e.g. working in a kitchen, appropriate footwear would be considered as shoes that protect against spills of hot liquid and provide a reasonable level of grip.

This would preclude workers wearing open toed sandals which would be considered as inappropriate.

This type of footwear would be considered as normal everyday shoes and would be deemed as appropriate for the task.

A construction site would however specify steel plate / toe caps to enter the site and would be seen as protecting against risks that would be present.

It is this kind of protection that is covered by this document.

Legal Requirements For PPE

In addition to the Personal Protective Equipment at Work Regulations 2002, a number of other regulations have specific requirements for the provision, maintenance and use of PPE.

These regulations include:

- Control of Substances Hazardous to Health Regulations.
- Noise at Work Regulations.
- Construction (Head Protection) Regulations.
- Control of Asbestos at Work Regulations.

Under the general requirements of the Health and Safety at Work Act section 8, employees cannot be charged for the provision or maintenance of PPE.

PPE must be 'issued' and not just given to a colleague and all PPE usage shall be covered by a risk assessment identifying both what type and why the PPE is required.

It is also requirement that all PPE is subject to a suitable and sufficient management system for the issuing, training, instructing, storing and use.

It is not acceptable to just give PPE out to colleagues without retaining documentation on who has been given what type of PPE.

PPE As A Last Resort

PPE **must** always be regarded as a 'last resort' to protect against risks to safety and health.

Engineering controls and identifying a 'safe system of work' must always be considered as a primary duty.

If it is possible to do the job by another method which will not require the use of PPE, then PPE should not be provided, because the other controls identified will provide protection to all colleagues and not just the worker utilising the PPE.

For example, fixed screens should be considered before providing individual eye protection.

There are a number of reasons why PPE must be considered as a 'last resort':

- PPE only protects the individual wearing it, whereas measures controlling the risk at source protect all colleagues in the workplace.
- Theoretical maximum levels of protection are difficult to achieve and the actual level of protection is difficult to assess. Effective protection is only achieved by selecting suitable PPE, correctly fitted, maintained and used by a trained and competent person.
- PPE may restrict the wearer to some extent by limiting mobility or visibility, or by requiring additional weight to be carried and may introduce other risks that will require consideration.

Although PPE is considered as a last resort, there is a further level which deals with Immunisation.

Although immunisation is proactive, it only protects in the event of actual exposure to the pathogen which suggests that other forms of personal protection have not prevented the exposure from occurring.

Both PPE and Immunisation could be considered as a final joint level of control once other options have been implemented.

Assessing & Choosing PPE

The need for PPE **must** be identified through risk assessment.

For example, a COSHH risk assessment should clearly identify that gloves are required when using the substance being assessed.

This information will need to be more detailed than just identifying that gloves are required but specifically consider what type of gloves may be required and the protection requirements that are needed to provided appropriate protection.

As with all risk assessments, the manager must ensure that those completing them are competent to do so.

In addition to identifying the need for PPE, it is essential that the right type of PPE is specified and provided.

British Standards and European Norms

There are various standards for PPE (e.g. hard hats EN397) too numerous to list in this document.

Within the standards there may also be various subdivisions to denote the standard of protection or type (e.g. ear muffs/defenders EN352-1, ear plugs EN352-2, helmet mounted muffs/defender EN352-3).

'UKCA' and 'CE' Marking

Currently, all PPE must be UKCA 'CE' marked.



The UKCA and CE mark signifies that the PPE satisfies certain required safety standards.

Suitability of PPE

To be able to choose the right type of PPE, the hazards involved in the task or work environment must be considered carefully and be reflected within the appropriate risk assessment.

The following factors should be considered when assessing the suitability of PPE:

- **Is the PPE appropriate for the risk involved** and conditions at the place where exposure may occur. E.g. a bump cap would not be suitable on a construction site, or goggles are not suitable when full-face protection is required, etc.
- **Does it prevent or adequately control the risks involved** without increasing the overall risk? E.g. gloves should not be worn when using a pillar drill, due to the increased risk of entanglement;
- **Can it be adjusted** to fit the wearer correctly? E.g. if a person wears glasses, earmuffs may not provide a proper seal to protect against noise hazards;
- **Has the state of health of those using it been taken into account?** Manufacturers take into account medical advice when designing PPE. However, where problems occur please seek advice from the Occupational Health;
- **What are the needs of the job** and the demands it places on the wearer? How long will it need to be worn? What are the requirements for visibility and communication;
- **If more than one item is being worn, are they compatible?** For example, does a particular type of respirator make it difficult for eye protection to fit correctly? Where hard hats and ear defenders are both required, it is recommended that a helmet with integrated ear defenders is provided.

Fit Testing of Respiratory Protective Equipment (RPE) Face-pieces

The initial selection of RPE will need to include fit testing, to ensure the wearer has the correct device, for RPE which has a tight-fitting face-piece (filtering face-pieces usually known as disposable masks, half and full-face masks).

Repeat fit testing will be needed, if anything changes e.g. change of model or size of face-piece or significant changes to the individual wearer's facial characteristics e.g. weight gain/loss, dentistry.

There are two forms of fit testing, **qualitative** and **quantitative**.

Normally for disposable filter face-pieces and half masks, **qualitative** fit testing is adequate and is a simple pass/fail based on the wearer's subjective assessment of the fit and leakage.

Qualitative testing is not suitable for full-face masks.

Quantitative fit testing provides a numerical measure of the fit that is called a fit factor and the test gives an objective measure of face fit.

They require specialised equipment and are more complicated to carry out.

These methods are recommended for full-face masks.

If you are unsure about what type of PPE to choose, Corporate Safety Advice and PPE suppliers can provide further advice and support.

Exemptions

Sections 11 and 12 of the Employment Act 1989, as amended by section 6 of the Deregulation Act 2015, provide an exemption from the need to wear head protection in any workplace, including construction sites, for turban-wearing Sikhs, with certain limited exceptions for high-risk tasks.

This exemption applies to any turban-wearing Sikh in the workplace whether they are an employee or not, for example visitors.

It applies solely to turban wearing members of the Sikh faith and the exemption applies only to head protection and Sikhs are required to wear all other necessary PPE under these regulations.

Where a turban-wearing Sikh chooses not to wear head protection, the exemption also includes a limitation on the liability of the duty-holder should an incident occur.

Employers are still required to take all necessary actions to avoid injury from falling objects by putting in place such safe systems of work, control measures and engineering solutions, for example restricting access to areas where this may be an issue.

The exceptions referred to relate to certain high-risk tasks performed by individuals in occupations which involve providing an urgent response to an emergency, where a risk assessment has identified that head protection is essential for the protection of the individual, such as a firefighter entering a burning building.

Environmental Considerations

For colleagues working inside or outside in extremes of temperatures and conditions, PPE should be considered as a last resort, although in some cases there are no other alternatives.

The law does not state a minimum or maximum temperature, but the temperature in workrooms should normally be at least 16°C (or 13°C if much of the work involves rigorous physical effort).

A meaningful maximum figure cannot be given, due to the high temperatures found in certain industries.

The Workplace (Health, Safety and Welfare) Regulations 1992 lay down particular requirements for most aspects of the working environment.

Regulation 7 deals specifically with the temperature in indoor workplaces and states that: *‘During working hours, the temperature in all workplaces inside buildings shall be reasonable’*.

See Safety Manual – SPA – ‘Office Safety’ for further information.

The application of the regulation depends on the nature of the workplace, such as a bakery, a cold store, an office, a warehouse.

Guidance on temporary adjustments to accommodate extremes of temperature is available from the HSE website (see references and further information).

These Regulations only apply to employees and currently do not apply to members of the public, for example, temperature complaints from customers.

Reducing the risks from hot weather conditions

Managers will need to ensure a risk assessment is in place to identify the control measures that are required which could include:

- Scheduling work activities to minimize exposure. UV rays are most intense when the sun is high in the sky, between 11am and 3pm;
- Encouraging colleagues to keep covered up during the summer months, especially at lunch- time when the sun is at its hottest. Managers should recommend the use of a long-sleeved shirt and a hat that protects the ears and neck;
- Providing and encouraging the use of a sunscreen of at least Sun Protection Factor (SPF) 15 or more that should be worn on any part of the body that cannot be covered up e.g. face, back of neck and hands. Total sun-block should be considered for exposed areas such as your nose, ears and lips, which are more susceptible to getting burnt. Sunscreen needs to be available and reapplied at regular intervals. Where the risk assessment identifies the need for sunscreen, it must be provided free of charge;
- Where a risk assessment formally identifies the need to provide eye protection in the form of sunglasses e.g. where glare creates a specific problem such as on or near water. Sunglasses must be “CE marked”, meet with BS EN 1836:2005 and have a UV 400 label. The type of sunglasses as protective equipment must be identified within a specific risk assessment;
- Ensure that adequate supplies of drinking water or cold drinks are readily available and that workers are encouraged to drink plenty of fluid to avoid dehydration;
- Include sun protection advice in induction and health and safety training.

Reducing the risks from cold weather conditions

The following people are likely to be at risk:

- Smokers who may have circulatory impairment;
- Colleagues who work outside and use equipment and have direct contact with the equipment's cold surfaces e.g. highways maintenance;
- Colleagues who work primarily outside and their work involves time constraint and/or an absence of fixed accommodation e.g. grounds maintenance, waste collection and Community Protection Officers.
- Colleagues whose work involves working in water;
- Colleagues who work in cold stores;
- Colleagues with certain medical conditions may be at increased risk.

Managers are responsible for ensuring a risk assessment has been carried out by a competent person.

This will help you decide if further control measures need to be implemented which **could** include:

- Avoid the need for work in water during winter months or other unusual cold periods;
- Ensure that time and provision is made for regular warm drinks or for breaks in warm environments;
- Ensure that suitable protective clothing is provided and worn and that this clothing also provides protection from wind and rain where appropriate e.g. appropriate gloves for use with hand tools and equipment that could give rise to Hand Arm Vibration Syndrome (which is exacerbated by cold conditions).
- Health surveillance.

Information, Instruction, Training & Supervision

Where PPE is provided, personnel must be provided with adequate information, instruction and/or training on its use.

The extent of information, instruction and/or training will vary with the complexity and performance of the kit (e.g. the difference between a disposable dust mask and a full Breathing Apparatus kit).

Information and instruction should cover, as appropriate:

- The risk(s) present and why the PPE is needed.
- The operation (including demonstration), performance and limitations of the equipment.
- Use and storage (including how to put it on, how to adjust and remove it).
- Any testing requirements before use.
- Any user maintenance that can be carried out (e.g. hygiene/cleaning procedures).
- Factors that can affect the performance of the equipment (e.g. working conditions, personal factors, defects and damage).
- How to recognise defects in PPE and arrangements for reporting them.
- Where to obtain replacement PPE.

In addition to initial training, refresher training may be required from time to time.

Supervisor checks on the use of PPE may help determine when refresher training is required.

Maintenance Requirements

Managers need to ensure that there is an effective system of maintenance of PPE as this is considered as essential to ensure the equipment continues to provide the degree of protection for which it is designed.

It is therefore recommended that the manufacturer's maintenance schedule (including recommended replacement periods and shelf lives) must always be followed.

Maintenance may include; cleaning, examination, replacement, repair and testing.

The wearer may be able carry out simple maintenance (e.g. cleaning), however more intricate repairs must only be carried out by competent personnel.

Any costs incurred associated to the implementation of a maintenance regime for PPE is the responsibility of the employer.

Storage For PPE

Managers must ensure that where PPE is provided, adequate storage facilities for PPE must be provided for when it is not in use, unless the employee may take PPE away from the workplace - e.g. footwear or clothing.

Accommodation may be simple (e.g. pegs for waterproof clothing or safety helmets) and it need not be fixed (e.g. a case for safety glasses or a container in a vehicle).

Storage needs to adequately protect the PPE from potential contamination, loss, damage, damp or sunlight.

Where PPE may become contaminated during use, storage should be separated from any provided storage provided for ordinary clothing.

Provision & Replacement

Irrespective of the arrangements for purchase, distribution, supply and replacement, it is the managers responsibility to ensure the provision and formal issue of suitable PPE is in place.

In order to assist managers with this responsibility, a 'PPE record of issue' form is included with this document and can be used if required.

When considering arrangements for providing replacement PPE it must be remembered that unless a task requiring PPE can be stopped, avoided or delayed until new PPE is obtained, replacement PPE must always be readily available.

Where PPE is identified as a requirement of the activity under the assessment and is not available, that activity must not continue until it has been provided. (PPE is subject to risk assessment and clear details of what is required needs to be identified)

Colleagues are required to ensure that PPE requirements, such as replacement need or issues of wear and tear, is done in a timely fashion.

Managers must implement a system whereby any PPE that is issued to colleagues is signed for by the person who will be required to use it in the prescribed circumstances identified by the formalised risk assessment.

References & Further Information

The following information and reference material is in place to assist managers to understand their responsibilities and duties.

NIC Documentation

- Personal Protective Equipment Issue Form
- Types of PPE Available

External References

- L25 – 'Personal Protective Equipment at Work' (HSE)
- INDG 174 – 'Personal Protective Equipment at Work' (HSE)
- INDG 330 – 'Selecting Protective Gloves' (HSE)
- HSG 53 – 'Respiratory Protective Equipment at Work' (HSE)