

Personal Protective Equipment (PPE) Arrangement

Contents:

1. Statement of purpose/objectives
2. Scope
3. PPE and RPE
4. What you must do
5. Roles and responsibilities – who does what
6. Implementation
7. Compliance
8. Review of Arrangement

1. Statement of purpose/objectives

This arrangement sets out the approach the Council will take to managing the use of PPE, including respiratory protective equipment (RPE), during its work activities.

The aim of this arrangement is to ensure compliance with the Personal Protective Equipment Regulations (2022) and other regulations, such as the Control of Substances Hazardous to Health Regulations 2002 and the Noise at Work Regulations 2005, where the provision of PPE might be required.

2. Scope

This arrangement applies to all service areas where, by way of risk assessment, it is deemed necessary for permanent and temporary staff and others (such as casual workers and volunteers) carrying out work on our premises, under our control, to wear PPE in order to control exposure to risks that cannot be adequately controlled by other means.

3. PPE and RPE

PPE includes, but is not limited to, safety helmets, gloves, eye or hearing protection, high-visibility clothing, adverse weather clothing, safety footwear and harnesses.

PPE also includes RPE, a particular type of personal protective equipment designed to protect the wearer from breathing in dust, mist, gas or fume that is harmful to health, commonly by filtering out the contaminant.

4. What you must do

Line Managers are required to:

1. By way of risk assessment, identify where PPE is needed to control the risks.
2. Provide, free of charge, the necessary PPE.
3. Ensure the PPE provided is fit for purpose – for RPE this is likely to include carrying out face fit testing.
4. Ensure the PPE is maintained and stored properly.

5. Provide wearers of PPE with instructions on how to use it safely.
6. Check to ensure it is being used correctly.
7. Ensure that replacement PPE is readily on hand.

5. Roles and responsibilities – who does what

The Organisation - Specific Responsibilities document sets out the roles and responsibilities with respect to health and safety for all levels of staff within the Council. This document forms part of the Council's Health and Safety Policy and can be found here: [Health and Safety Policy](#)

6. Implementation

Management guidance in the form of Frequently Asked Questions is provided and updated to support the implementation of this arrangement.

7. Compliance

Heads of Service and Service Managers have a role in ensuring that Line Managers are complying with this arrangement.

Compliance with this arrangement will be also checked during premise inspections and team audits carried out by the Health and Safety Team. Where work that requires PPE is seen being done without the necessary PPE the Health & Safety Team may require this to be recorded as a near miss.

8. Review of Arrangement

This arrangement will be reviewed by the Health and Safety Team every 5 years or sooner if there are significant changes that need to be implemented.

Consultation/Approving Bodies

Health, Safety & Welfare Group – January 2016

Reviewed by the Health and Safety Team - May 2020

Reviewed by the Health and Safety Team - May 2026

Frequently Asked Questions

Contents:

1. What is PPE?
2. How effective is PPE in controlling the risks?
3. Why is PPE considered to be the last resort?
4. Who provides PPE and how is it obtained?
5. Can PPE be shared?
6. Are there any exemptions to the need to wear PPE?
7. How do I select the right type of PPE?
8. How do I select the right type of RPE?
9. How do I carry out a face fit test for filtering RPE?
10. What information, instruction and training is required to use PPE?
11. What maintenance of PPE is required?

1. What is PPE?

PPE is defined in the Personal Protective Equipment Regulations 1992 as ***“all equipment (including clothing affording protection against the weather) which is intended to be worn or held by a person at work and which protects the person against one or more risks to that person’s health or safety, and any addition or accessory designed to meet that objective”***.

Where an employer conducts a risk assessment and finds PPE to be necessary, they have a duty to provide it free of charge to all workers, whether paid or voluntary.

Workers may be required to wear items of PPE under other legislation e.g. road traffic legislation requires crash helmets to be worn by workers on the road, Lead at Work, Ionising Radiation, Control of Asbestos, Noise at Work and COSHH.

2. How effective is PPE in controlling the risks?

PPE can effectively protect the individual wearing it if the correct type and fit has been selected and it is worn correctly and consistently. This requires careful management.

Before deciding whether PPE is required, a risk assessment must consider implementation of controls following a hierarchy, in the order shown below, from most effective at the top (a.) to the least effective (e.) at the bottom.

Hierarchy of controls

- a. **Elimination** – physically remove the hazard, e.g. by redesigning the task.
- b. **Substitution** – replace the hazard with one that presents lower risk
- c. **Engineering controls** – isolate people from the hazard
- d. **Administrative controls (safe systems of work)** – change the way people work
- e. **PPE** – protect the worker(s) and others affected by the work

If after applying controls a. to d. there remains a residual risk, the use of PPE may be required. PPE will only be necessary if it will further minimise the risk so that harm is unlikely. For example, PPE may be needed to reduce the remaining risk of injury or ill health from:

- breathing in dust, mist, gas or fume
- falling materials that are heavy enough to cause injury upon hitting people
- flying particles or splashes of corrosive liquids getting into people's eyes
- skin contact with corrosive materials
- excessive noise
- extremes of heat or cold
- contact with moving machinery

If the risk assessment shows PPE is needed for a task, it should always be used, even for those jobs that “only take a few minutes”.

Note: The use of PPE must not increase the overall level of risk (i.e. PPE must not be worn if the risk caused by wearing it is greater than the risk against which it is meant to protect).

3. Why is PPE considered to be the last resort?

There are a number of reasons:

1. PPE only protects the person wearing it, whereas controlling the risk at source can protect everyone in the workplace.
2. Maximum levels of protection with PPE are seldom achieved in practice, and the actual level of protection is difficult to assess.
3. Effective protection is only achieved by proper use of suitable PPE, correctly fitted and maintained.
4. PPE may restrict the wearer to some extent by limiting movement or visibility.

4. Who provides PPE and how is it obtained?

Services must provide all necessary PPE to staff and volunteers **free of charge**. Line Managers are responsible for sourcing PPE, although support in selecting the correct types can be obtained from the Health and Safety Team.

Employers cannot ask someone carrying out work under their control for money to pay for the provision of PPE (whether returnable or otherwise).

When providing PPE, managers should ensure that it is readily available and workers have clear instructions on where they can obtain it. PPE provision must be flexible enough to accommodate the needs of individuals, such as someone with an allergy to latex or a pre-existing medical condition etc.

Shropshire Council does not have any preferred suppliers of PPE. It can, therefore, be purchased from any source but please read sections 7. and 8. first.

As there will be considerable differences in the physical dimensions of different workers, more than one type or size of PPE may be needed. The required range may not be available from a single supplier.

5. Can PPE be shared?

Most PPE should be provided on a personal basis. However, it may be shared by workers where, for example, it is only required for limited periods. Within the Council, this situation may occur most often when providing PPE for volunteers. When shared, employers should ensure that such equipment is properly cleaned and, where required, decontaminated to ensure that there are no health risks to the next person using it.

6. Are there any exemptions to the need to wear PPE?

The Equality Act 2010 sets out a number of characteristics which are protected and prevent workers from being discriminated against in relation to the PPE Regulations. These protected characteristics cover age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sex and sexual orientation.

PPE will need to be suitable and sufficient and, if necessary, take into account any protected characteristic such as gender, pregnancy, race or any disability of the worker.

There is no exemption from the Regulations for disabled people, and suitable PPE must be provided and worn if the risk assessment indicates it is required. This may in some circumstances require adjustments and adaptations to PPE (e.g. a raised sole on protective footwear). Such changes should only be made in consultation with the manufacturer to ensure that the PPE remains suitable and sufficient.

Sections 11 and 12 of the Employment Act 1989 as amended by Section 6 of the Deregulation Act 2015 exempts turban-wearing Sikhs from any legal requirement to wear head protection at a workplace.

7. How do I select the right type of PPE?

All PPE must comply with Regulation (EU) 2016/425 which means it should have appropriate conformity assessment marking on the product, its packaging or accompanying documentation. It should also be provided with a declaration of conformity or an internet address at which it can be accessed.

PPE must be carefully selected, considering the following factors:

- (a) the job itself and the risks for which protection is needed. For example, if there is a risk from falling objects, consider providing suitable industrial safety helmets or hard hats
- (b) the physical effort needed to do the job. Consider how long the PPE has to be worn, and the requirements for visibility and communication
- (c) the environment and surrounding conditions. For example, the weather if working outside, temperature, noise, ventilation etc
- (d) the health of the person wearing the PPE and its ergonomic effects. PPE made of certain materials should not be issued to workers if they are known to cause allergies (for example, latex gloves). Heavy or bulky suits can cause or make worse existing musculoskeletal problems and cause thermal comfort problems.

A range of PPE may need to be offered to ensure that it fits the different sizes of the individuals that need to wear it and will be comfortable to wear. Incorrectly fitting PPE can increase risk, for example:

- coveralls that are too long could become entangled in machinery causing injury, or not provide adequate protection,
- RPE that does not fit the face shape of the wearer and will not form a correct seal to prevent ingress of contaminants. All tight-fitting facepieces (often referred to as masks) will require a face fit test to ensure the RPE can protect the wearer – see section 9. below.
- with harnesses or lifejackets, choosing the right size is particularly critical to protect against fatal hazards.

When selecting gloves care should be taken to ensure they are the correct type to protect the skin (e.g. from contact with a chemical or to protect against cuts from handling sharp objects) whilst providing the dexterity necessary to do the job. This guidance should be consulted, [Choosing the right gloves to protect skin: a guide for employers - HSE](#) and the Health and Safety Team can assist if necessary.

The aim should be to choose PPE which gives maximum protection while ensuring minimum discomfort to the wearer, as uncomfortable equipment is unlikely to be worn properly.

Those who do the job should be consulted and involved in the selection and specification of the equipment. There is a better chance of PPE being used effectively if it is accepted by the wearers.

The use of suitable PPE should cause no problems to the wearer. Where issues occur, managers should investigate to see if more comfortable PPE can be provided. The Health and Safety Team can be consulted for assistance with this. Where issues cannot be resolved, managers should make a referral to the Council's Occupational Health Service, occupational.health@shropshire.gov.uk for their advice as to whether the individual can tolerate wearing the PPE.

Incompatible PPE can cause failure of protection, e.g. eye protection that disturbs the seal of a respirator could cause the contaminant to be breathed in by the wearer. Choose hard hats and ear defenders carefully to make sure they can be worn together and are both effective.

Once you have selected PPE, it is recommended that you record the specific type in your risk assessment. All PPE must be provided to your staff and replaced **free of charge**.

Sources of information:

- HSE guidance on selecting the right type of PPE is available here [Using personal protective equipment \(PPE\) to control risks at work: Using the right type of PPE - HSE](#)
- Health and Safety Team, health.safety@shropshire.gov.uk
- Suppliers of PPE can be a useful source of advice if you explain the job to them.

8. How do I select the right type of RPE?

When choosing the right RPE there are a number of tools that can be used:

1. HSG 53, "Respiratory protective equipment at work" [HSG 53](#) is a practical guide with a flow chart to follow
2. Check the [COSHH Essentials guidance sheets](#) on HSE's website to see if any recommend a type of RPE for the type of work task

3. Use the online [RPE Selector Tool](#), developed by the Scottish Centre for Healthy Working Lives, working with HSE.

All tight-fitting facepieces (often referred to as masks) will require a face fit test to ensure the RPE can protect the wearer – see the next section.

Where a worker has either a pre-existing medical condition (e.g. a breathing disorder like asthma which may restrict or prevent them from wearing a tight-fitting mask) or facial hair/markings that prevent a good seal between the face and the RPE, other options such as a loose-fitting face piece, hood or helmet must be considered.

Depending on the contaminant that is being protected against the staff members needing to wear the RPE may need a baseline health assessment and ongoing health surveillance. Contact the Health and Safety Team, if necessary, to discuss.

9. How do I carry out a face fit test for filtering RPE?

Face fit testing is a method of checking that the face piece of the RPE seals adequately to the wearer's face. The persons carrying out the face fit testing must be competent, usually in accordance with the BSIF's Fit 2 Fit accreditation scheme.

In Shropshire, Face Fit testing is provided by Fire Safe International, [Face Fit Testing | Fit2Fit Accreditation | Face Fit Testing Training](#).

The competent "face fit tester" will also train the user in the correct use of the RPE at the time of face fit testing.

Face fit testing will need to be repeated at regular intervals (the interval chosen should be based on risk) or if there is a change to a different type of RPE or change to a person's face through weight loss/gain, scarring etc.

10. What information, instruction and training is required to use PPE?

All workers requiring PPE must be trained in:

- why it is needed and when to use it. This should be documented in relevant risk assessments and safe systems of work.
- its proper use, include a demonstration of how to fit it and remove it and what its limitations are (a record of this training should be kept),
- how to maintain and store it,
- when and how to replace it.

In fixed workplaces appropriate signs, that comply with The Health and Safety (Safety Signs and Signals) Regulations 1996, should be displayed where PPE is required – see Figure 1.



Figure 1. Mandatory signs, from Guidance on The Health and Safety Regulations 1996, L64.

11. What maintenance of PPE is required?

By law PPE must be properly stored and maintained to ensure that it is in good repair. For example, a dry, clean cupboard or box to store it in should be provided. PPE should not be left on

machines where they can become contaminated and seals damaged. If PPE is reusable, it must be cleaned and kept in good condition.

It is important to use the correct replacement parts and to follow the manufacturer's replacement schedule. Spare PPE should be kept so that it can be replaced when it is no longer in good repair.

Some PPE maintenance can be done by workers themselves, such as replacing a shoelace. More specialist equipment, such as a harness for working at height will require a thorough examination by a competent inspection company, usually every 6 months and regular operator checks prior to use.

The effectiveness of some types of PPE, particularly clothing, will be significantly reduced if they are not kept clean. Hi-vis jackets, trousers and coveralls must be cleaned or replaced regularly to ensure the reflective strips work effectively.

12. What can Managers do if an employee isn't wearing the necessary PPE?

A number of things can be done:

- Firstly, speak to the staff member to understand why they are not wearing the PPE.
- Ensure they can comfortably wear the PPE and provide them with alternative PPE if necessary.
- Check that they understand how and when to wear the PPE - have the risk assessments and safe systems of work been clearly communicated to them.
- Check that safety signs are clearly displayed (fixed workplaces).
- Carry out periodic supervision of the work and **STOP** the work until the individual(s) is wearing the necessary PPE.

Line managers must ensure staff wear PPE in accordance with the risk assessment and training provided. Persistent non-compliance should be recorded and managed in line with the Council's Code of Conduct and disciplinary policy.