

ROYAL HOLLOWAY, UNIVERSITY OF LONDON

PERSONAL PROTECTIVE EQUIPMENT

POLICY AND PROCEDURE

(Version 2)

1 Introduction

This Policy and Procedure reflects the College's commitment to meeting the requirements of the Personal Protective Equipment at Work Regulations 1992 (as amended). It identifies the duties of each Head of Department/School/Director (hereafter referred to as 'Managers') and provides guidance to those charged on their behalf with taking action necessary to ensure compliance.

The requirement for the College to provide Personal Protective Equipment (hereafter referred to as "PPE") is contained in the Personal Protective Equipment at Work Regulations 1992 (as amended), as well as a range of other legislation, Codes of Practice and formal guidance. Under the Regulations, PPE is defined 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 him against one or more risks to his health and safety.' For examples of types of personal protection please see Appendix 1.

The Regulations extend to assessing the need to ensure that PPE is suitable for the identified use, maintained in an efficient working state, and to the provision of information, instruction and training to enable effective use.

This Policy and Procedure is not intended to provide definitive guidance on the Regulations and where any doubt exists as to the action to be taken or advice or assistance being required, contact should be made with the College Health and Safety Office.

2 Application of other Regulations

The PPE Regulations do not apply where the following six Regulations require the provision and use of PPE against particular hazards:

- The Control of Lead at Work Regulations 2002
- The Ionising Radiations Regulations 1999
- The Control of Asbestos Regulations 2006
- The Control of Substances Hazardous to Health Regulations 2002 (as amended)¹
- The Control of Noise at Work Regulations 2005
- The Construction (Head Protection) Regulations 1989

¹ For requirements and guidance in relation to face fit testing of respiratory protective equipment please refer to the current College COSHH Policy and Guidance document.

For example, gloves used to prevent dangerous chemicals penetrating the skin would be covered by the Control of Substances Hazardous to Health Regulations 2002 (as amended). Other specific hazards would be covered by other Regulations in the list (i.e. noise, asbestos).

Nevertheless, even if the PPE at Work Regulations do not apply, the advice given in the formal Health and Safety Executive Guidance (available from the College Health and Safety Office) will still be useful, as general principles of selecting and maintaining suitable PPE and training of employees in its use are common to all the Regulations which refer to PPE.

3 Providing Personal Protective Equipment

Under the Regulations, PPE should be regarded as the last resort to protect against risks to health and safety. Managers must, therefore, ensure that through a process of risk assessment consideration is first given to the use of engineering controls and safe systems of work. In the event that after consideration of the above, there is still a residual risk, PPE will need to be provided.

The following principles for controlling risk should, therefore, be applied, preferably in the following order:

- a) try a less risky option;
- b) prevent access to the hazard;
- c) organise work to reduce exposure to the hazard;
- d) if after all the above there is still a residual risk, provide appropriate PPE.

Where any doubt may exist as to the action that is required to be taken or assistance being necessary, contact should be made with the College Health and Safety Office.

4 Selecting Personal Protective Equipment

Once it is established that PPE is a requirement, managers must ensure that they choose equipment which is correct for the particular risks involved and for the circumstances of its use. This will be achieved through a formal assessment of the suitability of the PPE and will be recorded.

In selecting PPE they will need to consider the following factors:

- Is the PPE appropriate for the risks involved and the conditions at the place where exposure to the risk may occur? For example, eye protection equipment designed to provide protection against chemicals will not provide adequate face protection when using an angle grinder to cut steel or stone;
- Does the PPE prevent or adequately control the risks involved without increasing the overall level of risk?;

- Can it be adjusted to fit the wearer correctly?;
- Has the state of health of those who will be wearing it been taken into account?;
- What are the needs of the work and the demands it places on the wearer? For example, the length of time the PPE needs to be worn, the physical effort required to do the job and the requirements for visibility and communication;
- If more than one item of PPE is being worn, are they compatible with each other? For example, does a particular type of respirator make it difficult to get eye protection to fit correctly.

Further advice on the selection of PPE can be obtained from the College Health and Safety Office. In addition, suppliers of PPE will be pleased to provide advice which may also be available from specialist sources, including PPE manufacturers. It may also be useful to contact the British Industry Federation (www.bsif.co.uk).

5 Charging for Personal Protective Equipment

The Regulations specifically state that no charge can be made to a worker for the provision of PPE which is used only at work. This relates to all charges including refundable deposits. Managers, therefore, cannot ask their staff to pay for PPE whether returnable or otherwise.

For advice on the charging of students and agency workers for the provision of PPE, please contact the College Health and Safety Office.

6 CE marking of Personal Protective Equipment

Managers must ensure that any PPE provided within their Department bears the 'CE' mark and complies with the Personal Protective Equipment Regulations 2002, concerning the design or manufacture of PPE with regard to health and safety. Confirmation as to whether PPE conforms to these requirements can be obtained from the supplier.

Note: PPE which was placed on the market before 1st July 1995 and is still suitable for the use to which it is being put and is properly maintained, does not need to be CE marked.

7 Maintenance of Personal Protective Equipment

Managers must ensure that all personal protective equipment is maintained (including replaced or cleaned as appropriate) in an efficient state, in efficient working order and in good repair. In practice, this will require an effective maintenance system for each type of PPE, which includes the following:

- a) examination - checking for faults, damage, wear and tear, dirt, etc;
- b) testing - to ensure PPE is operating as intended;

- c) cleaning - including disinfection where appropriate;
- d) repair;
- e) replacement.

Managers must also ensure that responsibility for carrying out maintenance, together with the procedures to be followed and their frequency are laid down in writing. Records of tests and examinations must also be kept.

Simple maintenance and repairs can be carried out by the trained wearer in accordance with the manufacturer's maintenance schedule. More intricate repairs should be undertaken by personnel with the required skills and technical knowledge (i.e. contract services from the manufacturers or suppliers).

8 Accommodation for Personal Protective Equipment

Managers must ensure that appropriate accommodation is provided for PPE when not in use. In practice, the accommodation will be dependent on the type of PPE provided.

Storage is needed as it prevents:

- a) damage from chemicals, sunlight, high humidity, heat and accidental knocks;
- b) contamination from dirt and harmful substances;
- c) the possibility of losing the PPE.

For further advice on what constitutes appropriate accommodation for specific PPE, please contact the College Health and Safety Office.

9 Information, instruction and training

Managers must ensure that everyone who is required to wear PPE is competent to do so, having received suitable and sufficient information, instruction and training (including refresher training) to enable them to make effective use of the PPE provided. The extent of the instruction and training will vary with the complexity and performance of the equipment, how frequently it is used, and the needs of the people being trained. Training should include elements of theory as well as practice in using the equipment, and should be carried out in accordance with any recommendations and instructions supplied by the PPE manufacturer. Many manufacturers of PPE run training courses for users of their equipment.

In order to ensure that PPE is properly used, information, instruction and training will need to be supplemented with adequate supervision of users. Those staff charged with undertaking a supervisory role will also need training and instruction so that they have the necessary skills to undertake this job.

Any training associated with PPE must be approved by the College Health and Safety Office, who are also available to provide further guidance on the detailed requirements of training programmes.

Records of training and refresher training must be retained by the Department.

10 Reporting loss or defect

Managers are required to make arrangements to ensure that staff, students and others within their area of responsibility can report loss or defect in PPE. These arrangements will include the procedure for reporting and the person to whom this reporting should occur, who will then ensure that defective PPE is repaired or replaced before the user concerned recommences work. Managers may, therefore, also need to ensure that suitable replacement PPE is always readily available.

Staff, students and others who are required to wear PPE must take reasonable care of it and comply with the above requirement to report any loss or obvious defect as soon as possible. Users of PPE, who have any concerns about the serviceability of the PPE, should immediately report this to their manager/supervisor.

11 Departmental compliance with this Policy and Procedure

Each department's compliance with the requirements of this Policy will be reviewed by members of the College Health and Safety Office during the health and safety audit process.

This Policy and Procedure forms part of the College's Health and Safety Policy.

Matt Purcell
Deputy Health & Safety Adviser
Version 2 (reviewed with no changes)
16th June 2010

'In accordance with the College's commitment to equality and diversity, this Policy has been written and screened to avoid discrimination and promote a positive approach to race, disability and gender issues. Comments on the content of this document should be directed to Mrs Leanie DuToit in the College Health and Safety Office.'

APPENDIX 1

Types of Personal Protective Equipment (PPE)

Head protection

e.g. industrial safety helmets, bump caps, transport helmets, leisure helmets

Eye and face protection

e.g. safety spectacles, goggles, face shields

Hand and arm protection

e.g. gloves, gloves with cuffs, gauntlets, sleeving/arm protection

Protective clothing

e.g. aprons, overalls, coveralls, body suits

High visibility clothing

e.g. Type 1, 2 and 3

Foot protection

e.g. safety boots or shoes, Wellington boots, clogs

Drowning protection

e.g. buoyancy aids, life jackets, immersion suits

Personal fall protection

e.g. work-restraint, work-positioning, rope-access, rescue, and fall arrest systems

Hearing protection

e.g. earplugs, earmuffs

Respiratory protective equipment

e.g. filtering face pieces, power-assisted respirators, breathing apparatus

For further guidance on the selection, use and maintenance of these and other types of personal protective equipment please contact the College Health and Safety Office.