

rmp

**Risk control**  
Personal Protective  
Equipment (PPE)



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# Risk Control

## Personal Protective Equipment (PPE)

The need for or absence of Personal Protective Equipment (PPE) or Respiratory Protective Equipment (RPE) has understandably been the subject of a huge amount of media coverage in recent weeks but how much do we really understand about this issue in the wider workplace context?

PPE is a term used to broadly describe a whole array of wearable clothing and devices aimed at offering a level of protection to all parts of the human anatomy from an almost endless list of hazards. Consequently, a whole industry has evolved to manufacture and supply items of PPE from hard hats used to limit injury from impacts to the head, to wellington boots for those who work in wet or muddy environments, who would otherwise be at risk from skin disorders and the damaging effects of cold on their extremities.

Health and safety practitioners have long advocated that the use of PPE should always be considered as the 'last line of defence' against workplace hazards, and where it is used, it should be supplementary to other more robust control strategies. This standpoint is taken for a number of reasons:

- When PPE fails, it fails to protect so the wearer is exposed and likely to suffer harm.
- In most cases PPE does not prevent accidents, it merely limits the level of injury when a situation gets out of control, i.e. it does not address the hazard source.
- It can be uncomfortable and unfashionable and is subject to human fallibility in several ways.

Historically however, employers have often seen PPE as a first choice option for protection because it can be quick and convenient to deploy and can be considered an inexpensive control measure by those who do not appreciate the wider and ongoing associated costs.

When risk assessing the activities of employees (and others in the workplace who you have responsibility for) it is expected that the employer will consider and apply the Principles of Prevention<sup>1</sup> in order to bring hazards and their associated risks under a reasonably practicable level of control. In practice this means employers need to conduct a type of 'risk versus cost' benefit analysis that justifies the time, trouble, effort and cost that can be afforded to implement the various control options when weighed against the level of risk in a given situation. Unfortunately this is not always a straightforward calculation to make, but the law does not require a disproportionate level of response to a risk and provides guidance<sup>2,3</sup> to try to clarify the standards that should be adopted.

If a risk assessment identifies that the use of some form(s) of PPE will be required, then a further more specific assessment will have to be made to consider and determine the following:

What is the nature and form of the hazard e.g. is it an airborne dust, vapour, fibre or biological agent?

What part(s) of the body will it affect?

What is the level and type of harm the hazard presents e.g. is it a chemical highly toxic and likely to kill with minimal exposure or only mildly irritating after many hours of contact?

Who and how many people are exposed, and for how long?

What activities are they expected to perform and in what environmental conditions?

It then becomes imperative that employers select the correct specification of PPE to withstand the threat presented. Different standards exist in each category of PPE e.g. High visibility clothing for working on live carriageways usually exceeds the standards required for working on a conventional construction site. Therefore, you may need to seek competent advice from PPE suppliers and manufacturers to ensure the capabilities of the equipment are sufficient and that any limitations are understood. It is a requirement under The Personal Protective Equipment Regulations 1992<sup>4</sup> that employers also take account of issues of compatibility when selecting PPE and ensure one piece of PPE does not adversely affect the performance of another when worn simultaneously.

Please note that all PPE should carry CE marking to show it has met minimum standards of conformance, but please do not confuse this with the specific standards of protection that each type and grade of PPE is manufactured to satisfy. E.g. some safety glasses may be designed to resist impacts from flying debris or chemical splashes but only within certain parameters.

Once the right standard of PPE has been selected then employers need to consider and manage the following:

Employee involvement in final selection trials where issues of restriction on movement, thermal comfort, compatibility and aesthetics etc. can be evaluated.

The PPE needs to be readily available in a range of sizes to comfortably fit the relevant people – a 'one size fits all' approach rarely works.

Procurement teams need to ensure specifications for PPE are not altered over time without the risk assessment being reviewed.

Employees will need training (and periodic refreshers) on why the PPE is needed, when and how to wear it, what are its limitations, how and where to store it and clean it, how to get replacements, who to report any problems to etc. This training and any reissue should be recorded.

The strategy for monitoring / supervision to ensure employees are using the PPE correctly and what remedial or disciplinary actions will be adopted for non-compliance.

Any failures in PPE should be investigated promptly along with a regular review of risk assessments to identify if any significant changes have occurred that could impact on the effectiveness of controls.

There is clearly a lot to contemplate before choosing PPE as a control method and if we fail to do so, we cannot expect PPE to provide robust and reliable protection for our people.

The HSE website<sup>5</sup> provides a range of useful and easy to access resources, or alternatively, contact your RMP Risk Control Consultant for advice and support.

## References

- 1 <http://www.legislation.gov.uk/ukxi/1999/3242/schedule/1/made>
- 2 <https://www.hse.gov.uk/pubns/indq174.pdf>
- 3 <https://www.hse.gov.uk/pubns/books/l25.htm>
- 4 <http://www.legislation.gov.uk/ukxi/1992/2966/contents/made>
- 5 <https://www.hse.gov.uk/toolbox/ppe.htm>

## Further information

For access to further RMP Resources you may find helpful in reducing your organisation's cost of risk, please access the RMP Resources or RMP Articles pages on our website. To join the debate follow us on our LinkedIn page.

## Get in touch

For more information, please contact your broker, RMP risk control consultant or account director.

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