

rmp

Risk control
Personal Protective
Equipment (PPE)



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Risk Control

Personal Protective Equipment (PPE)

The need for Personal Protective Equipment (PPE) or Respiratory Protective Equipment (RPE) has understandably been the subject of a huge amount of debate and media coverage over the past year or so, 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 to the hazard 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.

Employers have often viewed PPE as a first option for protection of employees because it can be quick and convenient to deploy and can be considered an inexpensive control measure in comparison to addressing the hazard source.

When risk assessing the activities of employees (and others in the workplace such as visitors and contractors) it is expected that the employer will consider and apply the Principles of Prevention¹ 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 'risk versus cost' benefit analysis that justifies the time, effort and cost that can be afforded to implement the various control options when weighed against the level of risk presented. Unfortunately this is not always a straightforward calculation to make, however, the law does not require a disproportionate level of response to a risk and provides guidance^{2, 3} to try to clarify the standards that should be adopted.

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

- The nature and form of the hazard (e.g. airborne dust, vapour, fibre or biological agent etc.).
- The part(s) of the body it will affect.
- The level and type of harm the hazard presents (e.g. is a chemical highly toxic and likely to kill with minimal exposure or only mildly irritating after many hours of contact?)
- Persons exposed to the hazard, including numbers of people and the duration of exposure.
- The activities that are to be performed and 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 1992⁴ that employers also take account of issues of compatibility when selecting PPE and ensure one item of PPE does not adversely affect the performance of another when worn simultaneously.

All PPE should carry a CE or UKCA marking to show it has met minimum standards of conformance. The UKCA marking came into effect on 1 January 2021 within the United Kingdom, however, to allow businesses time to adjust to the new requirements, the CE marking will still be in use until 1 January 2022 in most cases⁵.

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.

Summary

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 website⁶ 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/indg174.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.gov.uk/guidance/using-the-ukca-marking>
- 6 <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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