

Personal Protective Equipment Corporate Procedure

This procedure is issued and managed by Corporate Health and Safety

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AIM

The aim of this document is to ensure that West Lothian Council has suitable and sufficient arrangements in place to ensure risks posed to the health and safety of its employees and others through its activities that cannot be prevented so far as is reasonably practicable by the application of the principles of the hierarchy of control are controlled by the provision of suitable and sufficient Personal Protective Equipment (PPE).

Where other existing regulations identify specific requirements for particular PPE they will take precedence over the Personal Protective Equipment Regulations (PPE Regs) otherwise the requirements of the PPE Regs apply.

SCOPE

This procedure applies to:

- Managers at all levels which include Head Teachers/ Depute Head Teachers, Supervisors, Co-ordinators & Team Leaders - **herein referred to as manager(s)**.
- All employees of West Lothian Council

This procedure provides information on:

- Responsibilities
- Assessing the requirement for PPE
- Managing the provision of PPE
- Requirements and training on PPE for staff
- Making employees aware of their duties surrounding the use and care of PPE

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1. Definition of Personal Protective Equipment

- 1.1 The definition of Personal Protective Equipment is:-

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 them against one or more risks to his health or safety', e.g. safety helmets, gloves, eye protection, high-visibility clothing, safety footwear and safety harnesses.

- 1.2 Hearing and respiratory protective equipment provided for most work situations are not covered by these Regulations because other regulations apply to them. However, these items need to be compatible with any other PPE provided.
- 1.3 Cycle helmets or crash helmets worn by employees on the roads are not covered by the Regulations. Motorcycle helmets are legally required for motorcyclists under road traffic legislation.
- 1.4 Certain PPE is covered by the Medical Devices (Amendment) Regulations 2008 when used in a medical context e.g. medical examination gloves.
- 1.5 Protective clothing and equipment is PPE but clothing not specifically designed to protect the health and safety of the wearer is not. Some examples would be:
 - A uniform provided with the primary aim of presenting a corporate image is not PPE.
 - Protective clothing provided for hygiene purposes in food preparation areas is not PPE.
 - A carer's uniform would not be considered to be PPE, however a plastic apron being used when providing personal care is.

2 Responsibilities

- 2.1 General health and safety responsibilities of all employees are set out in the Council's Health and Safety Policy.
[https://www.westlothian.gov.uk/media/18909/Corporate-Health-and-Safety-Policy-November-2017/pdf/WLC Health and Safety Policy v9 \(17\) - 31.10.17.pdf](https://www.westlothian.gov.uk/media/18909/Corporate-Health-and-Safety-Policy-November-2017/pdf/WLC%20Health%20and%20Safety%20Policy%20v9%20(17)%20-%2031.10.17.pdf)

2.2 Chief Executive

The Chief Executive retains overall responsibility for the Council's Health and Safety Policy and this procedure.

2.3 Depute Chief Executive

Depute Chief Executives are responsible and accountable to the Chief Executive for the health, safety and welfare of everyone affected by the work activities in their directorates and will demonstrate clear commitment to achieving high standards of health and safety management.

2.4 Heads of Service

- 2.4.1 Heads of Service are responsible for ensuring:
 - Suitable persons are appointed to take responsibility for implementing this procedure.
 - Suitable and sufficient assessments are undertaken including assessment for the requirement of PPE as a control measure.
 - Provision of resources to ensure that identified PPE is provided as required to employees.
 - Ensure Service procedures are implemented that clearly identify how PPE will be managed within their service.

2.5 Managers

2.5.1 All managers are responsible for:

- Implementation of measures required to comply with this procedure.
- Completion of Risk Assessments, CoSHH Assessments and subsequent implementation of controls identified requiring the use of PPE for those areas within their control/responsibility.
- Ensuring that provision of training for the wearers of PPE that includes the risks the PPE will avoid or limit, the purpose and manner for which the PPE is to be used and action to be taken by the employee to ensure PPE remains in good working as well as hygienic conditions.

2.6 Employees

2.6.1 Employees who are provided PPE must:

- Wear and use their PPE as trained and instructed.
- Ensure it is free from defects and / or damage prior to its use.
- Where any defect or damage is found report it immediately to their manager and obtain new equipment.
- Report the loss or misplacement of PPE.
- Observe instructions cleaning and maintenance.
- Inform the employer of any problems encountered when using PPE.

3 Assessing the need for Personal Protective Equipment

3.1 A risk assessment is the systematic examination of a task, job or process to identify significant foreseeable hazards. It requires the identification and implementation of measures to reduce hazards following the hierarchy of control measures. More information on risk assessment can be found in "Risk Assessment Guidance" on My Toolkit: <https://intranet.westlothian.gov.uk/article/29177/Risk-Assessment>

3.2 An assessment must determine when PPE is required i.e. when employee exposure cannot be adequately controlled in any other way or where PPE is specifically stipulated as necessary by regulations. This means the hierarchy of control must be followed to reduce the hazard to an acceptable level before resorting to using PPE.

3.3 The assessment must identify the appropriate types of PPE for the work being undertaken.

3.4 Assessments must be recorded on the Councils Health and Safety Management System Sphera and reviewed:

- If it is suspected the previous assessment is no longer relevant or valid;
- After an accident or near miss;
- If legislation changes require it;
- When the health and safety policy / procedure or guidance requires it.

3.5 Some or all of the following may need to be taken into account in the risk assessment:

- Who could be exposed to the hazard?
- What could they be exposed to?
- How long will they be exposed for?
- How much are they exposed to?
- What parts of the body may be affected?
- What is the nature of the task that is being undertaken?
- What is the degree of physical effort required?
- What are the methods of work for undertaking the task?

- How long will the PPE need to be worn?
- Any special requirements e.g. ease of use when wearing spectacles or with other PPE, wearing more than one piece of PPE and making sure they are compatible.

3.6 Where PPE is identified as required it must:

- Be appropriate for the working environment.
- Take account of the users health, work factors, physical factors.
- Adequately control the risk presented by the hazard without increasing the overall risk experienced by the user.

4 Selecting Personal Protective Equipment

4.1 The type and nature of hazards in the workplace will be a primary indicator for the right type of PPE to be provided. The following questions should be considered when assessing whether the PPE is suitable or not:

- Is it appropriate for the risks involved and the conditions at the place where exposure to the risk may occur? For example, eye protection designed for providing protection against agricultural pesticides will not offer adequate face protection for someone using an angle grinder to cut steel or stone;
- Does it prevent or adequately control the risks involved without increasing the overall level of risk?
- Can it be adjusted to fit the wearer correctly? (In the case of close fitting respiratory protective equipment specialist face fit testing is required)
- Have health condition or needs of those who will be wearing it been taken into account?
- What are the needs of the job 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? For example, does a particular type of respirator make it difficult to get eye protection to fit properly?

4.2 The manager must ensure that any PPE which they provide for use by employees is 'CE' marked and complies with the requirements of the Personal Protective Equipment Regulations 2002. The CE marking signifies that the PPE satisfies certain basic safety requirements and in some cases will have been tested and certified by an independent body.

5 Types of PPE

5.1 There are various types of PPE available for use in the workplace. These include:

- Head and scalp protection;
- Respiratory protection;
- Eye protection;
- Hearing protection;
- Hand and arm protection;
- Foot and leg protection;
- Body protection;
- Height and access protection;
- Personal safety at work devices (Lone Working Devices).

5.2 Head and Scalp Protection

5.2.1 There primary purposes of head protection are to protect:

- The head in falls
- Against falling objects, impact with fixed objects, or wielded weapons;

- The head by offering thermal insulation;
- Against entanglement and laceration to the head;
- Against scalping/entanglement particularly on machinery where injuries are still numerous.

5.2.2 All forms of head and scalp protection must be:

- Appropriate to the risks that the head and scalp could be exposed to,
- Correctly fitted
- Have an easily adjustable headband, nape and chin strap where appropriate.

5.2.3 Options include safety helmets, bump caps and hair nets. Some safety helmets can incorporate or be fitted with eye or hearing protection if the assessment deems it is necessary.

5.2.4 More information on head protection can be found in standards BS EN 397:2012+A1:2012

5.3 Eye protection

5.3.1 PPE for the eyes is intended to provide protection against impact, cuts, splashes, mists and sprays. Examples are safety over glasses, face screens, face shields, visors.

5.3.2 All PPE must be regularly cleaned, but this is especially important in the case of eye protection as dirty lenses lead to poor vision and may contribute to accidents.

5.3.3 Where lenses or visors become scratched, pitted or cracked they should be replaced.

5.3.4 Users who wear corrective lenses (glasses) should have this accommodated in the provision of their PPE e.g. provision of protective over glasses / goggles compatible with the wearing of spectacles.

5.3.5. More information on personal eye protection can be found in standards BS EN 166:2002

5.4 Hearing Protection

5.4.1 Assessments carried out under the 'Control of Noise at Work Regulations 2005' will determine whether personal ear protectors are required in the workplace or not, and the noise attenuation required from the PPE provided.

5.4.2 In providing hearing protection, protectors should be suitable for the working environment and consideration given to how comfortable and hygienic they are. Like other PPE, hearing protection will need to be compatible with other PPE (e.g. hard hats, dust masks and eye protection) worn by workers.

5.4.3 Examples of hearing protection include earplugs, ear muffs semi inserts/ canal caps.

5.4.4 Managers may wish to have a range of protectors suitable to the task to allow employees to choose ones which suit them and are comfortable.

5.4.5 When selecting hearing protection, use the detailed noise assessment to determine the attenuation required at High, Medium and Low frequencies and match this against suitable products.

5.4.6 Training in the use of ear plugs will be required to ensure that they are used correctly.

5.4.7 Where ear defenders are used it should be ensured wearers do not use music headphones simultaneously.

5.4.8 More information on hearing protection can be found in the standard BS EN 352-2:2002

5.5 Hand and arm protection

5.5.1 Most work requires a degree of manual dexterity and consequently the hands are exposed to a wide range of hazards including the risk of cuts, abrasions, heat, cold, chemical contamination, vibration, burns, infection, skin irritation and dermatitis.

5.5.2. Gloves and gauntlets provide the main form of hand protection against a range of work place hazards but other forms of PPE such as mitts, wrist cuffs or armllets may also be used depending on the findings the assessment of work tasks.

5.5.3 In the case of manual handling where there may be a risk of piercing by abrasive, sharp or pointed objects, gloves should be provided where these hazards cannot otherwise be removed, isolated or reduced to an acceptable level. Such gloves are usually made from leather, chain mail, rubber, knitted Kevlar or stout canvas.

5.5.4 Where there is a risk of chemical exposure and the risk extends to contact with the arms gauntlets should be specified rather than gloves.

5.5.5 BS EN 14328 is the standard for gloves and armguards protecting against cuts by powered knives while BS EN 407 contains the specifications for gloves intended to protect against thermal risk such as heat and/or fire. BS EN 374 Part 1 covers gloves for protection against chemicals and micro-organisms. BS EN 511 covers gloves for protection against the cold. BS EN 388 covers the specification of gloves against mechanical hazards.

5.6 Foot and leg protection

5.6.1 A wide range of safety footwear is available providing protection against many hazards to the feet or legs including crushing, slipping, piercing, temperatures, electricity, chemicals, cutting, and chopping. Depending on the hazard identified in risk assessments various PPE options may be appropriate including safety boots and shoes with protective toe caps, penetration-resistant mid-sole; gaiters; leggings; and spats.

5.6.2 The relevant standard for safety footwear is BS EN ISO 20345. BS EN ISO 17249:2004 is the standard for chainsaw footwear.

5.7 Body protection

5.7.1 PPE excludes ordinary working clothes and uniforms which have no specific protection for the wearer. However body protection may be required for extended periods of work outdoors to protect against the weather or to ensure high visibility during work.

5.7.2 PPE for the body may also be required where workers are exposed to extremes of temperature (whether outdoors or indoors), as well as chemical or metal splashes, spray from pressure leaks or spray guns, impact or penetration, contaminated dust, excessive wear, entanglement of own clothing or the risk of drowning.

5.7.3 When choosing body protection the following factors should be considered:

- Thermal comfort e.g. exposure to extremes of temperature or due to sweating,

- Cost and practicality of cleaning,
- Emergency procedures, such as buoyancy or the need to be identified or spotted in hazardous situations,
- Level of hygiene control required,
- Level of personal contamination,
- Personal preference,
- Restriction of movement,
- Storage,
- Temperature and humidity fluctuation,
- Whether the worker is involved in a process that is wet or dry.

5.8 Respiratory protection

5.8.1 This covers equipment ranging from breathing apparatus and positive pressure powered respirators through to protective hoods, close fitting full face respirators, half mask respirators and disposable face masks.

5.8.2 It is essential to select the correct equipment both for the risk and the individual and to ensure there is adequate training in its use.

5.8.3 The only form of respiratory protection suitable for work in a confined space is breathing apparatus. Other forms of respiratory protection do not provide a source of air or oxygen.

5.8.3. Face fit testing for RPE must only be conducted by a competent person who has been trained in the conducting of these tests from an accredited trainer.

5.8.4. Face Fit testing records must be given to the individual concerned who along with the Face Fit tester retains these for a minimum of three years.

5.8.5 Face fit testing requirements apply to all close fitting respirators where the requirement to wear them has been identified through the completion of a CoSHH Risk Assessment. For further information on CoSHH please refer to:
<https://intranet.westlothian.gov.uk/article/29160/Control-of-Substances-Hazardous-to-Health>

5.8.6. More information on respiratory protection can be found within BS EN 136:1998

5.9 Height and access protection

5.9.1 The range of protective equipment for this type of hazard is very wide and includes body harnesses, fall-arrest systems, rescue lifting and lowering harnesses, energy absorbers and lanyards.

5.9.2 It is specialised PPE and requires thorough training by competent persons, including user checks and correct use.

5.9.3 This type of equipment will require inspections by a competent person.

5.9.4. For further information on working at height refer to the Working at Height Guidance document: <https://intranet.westlothian.gov.uk/article/29167/Work-at-Height>

5.10 Skin care: 'Barrier' creams

5.10.1 Some occupations expose the skin and make it more susceptible to conditions caused by contact with substances such as cutting oils; chemicals, degreasants, glass-fibre and some horticultural agents (e.g. slug pellets). The main condition is dermatitis, in a variety of its forms.

5.10.2 The use of barrier creams cannot be considered as personal protective equipment. It provides negligible protection and is unlikely to be effective in preventing contact dermatitis. The benefit of using barrier creams is in preventing dirt from becoming so ingrained that it is difficult to remove.

5.10.3 A properly implemented routine skin-care hygiene programme, including barrier creams, emollient and skin-conditioning creams can help protect and replace the natural skin oil which is otherwise removed by degreasants and solvents.

5.11 Personal safety at work devices (Lone Working Devices)

5.11.1 Where it has been identified through the Risk Assessment the additional control measure of a Lone Working Device (LWD) is required employees shall:

- Have access to a device for use when lone working.
- Be provided with training on the use of the LWD. Training must be registered with the provider of the LWD.
- Be provided with information and instruction on what to do if the LWD becomes faulty, is lost or damaged.
- Be informed that use of the LWD is monitored on a monthly basis.

5.11.2. More information can be found on Lone working devices at:

<https://intranet.westlothian.gov.uk/article/37801/Lone-Worker>

6. Paying for Personal Protective Equipment

6.1 The Council do not charge for PPE identified as required as part of a risk assessment. This includes employees and agency workers regarded as employees.

6.3 If an employee has their employment terminated or leaves of their own volition and does not return their PPE when requested to do so the cost(s) for the replacement of that PPE may be deducted from any salary owed to the employee.

7. Information and training

7.1 Wearers of PPE must be provided with information, instruction and training, which is adequate and appropriate, so that they understand:-

- The hazard or hazards which the PPE wholly or partly protects against, and the level of protection it offers against each individual identified hazard.
- The purpose for which the PPE must be used.
- How to operate and adjust the PPE.
- The limitations of any PPE provided.
- Any factors that may affect the performance of the PPE.
- How to maintain the PPE in a good state of efficiency and repair if appropriate.

7.2 PPE should only be used after adequate training has been provided and service should have in place adequate levels of supervision to ensure that this training and instruction is followed.

7.3 Training records should be kept wherever more than very simple instruction is required.

8. Maintenance of Personal Protective Equipment

- 8.1 PPE should be kept clean as possible, in good order and disinfected where required. Manufacturer's maintenance schedules and instructions must be followed.
- 8.2 Where manufacturer's maintenance schedules and instructions identified more in depth cleaning and maintenance provision should be made either by contracting the cleaning services or by training staff to carry out this task. More intricate repairs or repairs on complex equipment should only be done by specialist personnel.
- 8.3 Simple maintenance can be carried out by the trained wearer who must be shown the manner in which this has to be done at time of issue.
- 8.4 Where appropriate, records of checks and maintenance, and where appropriate examination and tests, must be kept. Any defects must be reported by the wearer to the appropriate person e.g. line manager, lab or workshop supervisor / technician etc. and the PPE replaced or repaired before re-use.

9. Storage of Personal Protective Equipment

- 9.1 Means of storage must be provided for PPE when it is not in use to protect it from loss or damage e.g. pegs or lockers for clothing or a protective box or a case for safety eyewear or RPE.
- 9.2 An area should be identified for used contaminated PPE and this should be separate from that provided for ordinary clothing. PPE contaminated with hazardous materials may need special storage arrangements.

10. Signage for PPE

- 10.1 In static work areas signage must be displayed in a prominent position in areas where wearing of PPE is mandatory.
- 10.2 Signs must be clear and legible, and should be used to identify what PPE must be worn in a specific area that must be followed e.g. hearing protection must be worn.

11. Spillages and other emergencies

- 11.1 PPE provided for use to manage spillage or other emergencies should, wherever reasonably practicable be stored outside the area of intended use. The spillage/emergency kit must be stored in a suitable cupboard close to the main access/egress point.
- 11.2 Where this is not possible, face masks/filters etc. must be stored in sealed containers where they cannot become contaminated.

12. Key legislative requirements

- Health and Safety at Work etc. Act 1974,
- The Management of Health and Safety at Work Regulations 1999

- The Personal Protective Equipment at Work Regulations 1992 (PPE Regs)
- Control of Substances Hazardous to Health Regulations 2002 (CoSHH)
- Workplace (Health, Safety & Welfare) Regulations 1992
- Control of Noise at Work Regulations 2005
- Dangerous Substances and Explosive Atmosphere Regulations 2002
- The Work at Height Regulations 2005
- The Health and Safety (Safety Signs and Signals) Regulations 1996

13. Other Regulations

The PPE at Work Regulations do not apply where the following regulations require the provision and use of PPE for identified hazards:

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