



## Health & Safety Personal Protective Equipment (PPE) Policy

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<sup>1</sup> or earlier if change in legislation or on risk assessment

### Amendment Control

Version	Date	Amendments
V1.0	Aug 2015	
V2.0	Mar 2019	Types of PPE, issuing/replacement, cleaning/maintenance, training (SH)
V2.1	Mar 2020	Page 4, no. 2 – added paragraph 5
v3.0	June 2022	Updated to include PPE Regulations 2022 – Limb worker and review of policy

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## Policy Summary

Personal Protective Equipment (PPE) must be provided by the University for staff who may be exposed to a risk to their health and safety whilst at work where all other means of controlling the risk have failed, or are insufficient, or it is necessary for it to be available in the event of an emergency.

PPE is defined as all equipment, including clothing affording protection against the weather, which is intended to be worn or held by persons at work and which protects them against one or more risks to their health or safety.

The main legislation relating to the provision of PPE is the Personal Protective Equipment at Work Regulations. These Regulations do not apply where the following Regulations have already established requirements for the supply and use of PPE:-

- The Control of Lead at Work
- The Ionising Radiation Regulations
- The Control of Asbestos at Work Regulations
- The Control of Substances Hazardous to Health (COSHH) Regulations
- The Noise at Work Regulations
- The Construction Design and Management Regulations

None of these Regulations apply to ordinary working clothes and uniforms which do not specifically protect the health and safety of the wearer, protective clothing provided in the food industry for food hygiene, portable equipment for detecting/signalling risks and nuisances, and equipment used during the playing of competitive sports.

Deans of Schools/Directors of Service are responsible for ensuring that suitable and appropriate risk assessments are made of the need for PPE by their staff and that any control measures recommended by the assessments are implemented and compliance maintained. When carrying out the risk assessment ensure that when selecting PPE it does not create another hazard or stop other PPE working effectively.

The PPE at Work Regulations do not apply to students or visitors, however because the University is required by the Health & Safety at Work Act to ensure that persons not in their employment are not exposed to risks to their health and safety, the University will provide PPE to students and visitors where their health and safety is at risk as a result of University activities.

No charge can be made on staff for the provision of PPE which is used only at work. Note: As per the Personal Protective Equipment at Work (Amendment) Regulations 2022 (PPER 2022) Limb workers will also not be charged for PPE.

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## 1. Hierarchy of controls

Personal Protective Equipment (PPE) should be regarded as the last resort to protect against risks to health and safety. All engineering controls and safe systems of work should be considered first.

Consider controls in the following order, with elimination being the most effective and PPE being the least effective.

**Elimination** – physically remove the hazard

**Substitution** – replace the hazard

**Engineering controls** – isolate people from the hazard

**Administrative controls** – change the way people work

**PPE** – protect the workers with personal protective equipment

A risk assessment should be undertaken to determine what can be put in place to protect staff. A risk assessor is required to go through the hierarchy of control to determine how risks can be managed, with PPE as the last resort.

## 2. Types of personal protective equipment

Please see [Appendix A](#).

## 3. Selection and use

Before you select PPE, think about:

- who is exposed
- what they are exposed to
- how long are they exposed for
- how much are they exposed to

By involving your workers when selecting PPE, they will be more likely to understand its importance and use it.

Also ensure that CE or UKCA markings are on the equipment to ensure conformity. The selected equipment must suit the worker - this includes size, fit, compatibility and weight of the PPE and physical characteristics of the user. Do **not** modify PPE to fit.

If the risk assessment identifies PPE, then the correct type to protect the different parts of the body must be provided.

Hazards include:

- Eyes – chemical or metal splash, dust, projectiles, gas and vapour or radiation.

- Head and neck – falling or flying objects, risk of banging the head, hair getting tangled in machinery, chemical drips or splash, climate or extreme of temperatures.
- Ears – noise coming from a combination of sound level and duration of exposure.
- Hands and arms – abrasion, temperature, cuts, impact, chemicals, electric shock, radiation, biological agents or prolonged immersion in water.
- Feet and legs – temperature, electrostatic build-up, slipping, cuts, falling objects, heavy loads, metal and chemical splash or being struck by a vehicle.
- Lungs – oxygen-deficient atmospheres, dusts, gases or vapours.
- Whole body – vibration, heat, chemicals or metal splash, spray from pressure leaks or spray guns, contaminated dust, impact or penetration.

Ensure that the PPE is compatible with other PPE being used and does not create a hazard.

The risk assessment must include the make, model, supplier details on the selected PPE, so that everyone understands what they have to order and wear to reduce the risk.

#### **4. Issuing and replacement of personal protective equipment**

Before issuing PPE, it should be confirmed by the supervisor that the user knows how to use the PPE.

PPE should be examined before being issued and worn, to ensure it is in good working order by a competent person. Defective or dirty PPE should not be issued. For some PPE, it would be sufficient for the PPE to be held in the storage facility provided and examined by the wearer prior to use on each occasion.

Schools/Services should make suitable arrangements for reporting the loss or defects in PPE and communicate this to the staff.

Users of PPE are required to take reasonable care of PPE and report to their supervisor any loss or obvious defects as soon as possible. Any concern regarding the suitability of the PPE should also be reported to the supervisor.

Where it is necessary to ensure that personal protective equipment is hygienic and otherwise free of risk to health, every employer and every self-employed person shall ensure that personal protective equipment provided under the PPE regulations is provided to a person for use only by that person.

The PPER 2022 changes any worker that falls under the following requires to be provided with PPE.

In the UK, section 230(3) of the Employment Rights Act 1996's definition of a worker has 2 limbs:

- Limb (a) describes those with a contract of employment. This group are employees under the Health and Safety at Work etc Act 1974 and are already in scope of PPER 1992.
- Limb (b) describes workers who generally have a more casual employment relationship and work under a contract for service – they do not currently come under the scope of PPER 1992.

PPER 2022 draws on this definition of worker and captures both employees and limb (b) workers:

“Worker” means ‘an individual who has entered into or works under:

- a) a contract of employment; or
- b) any other contract, whether express or implied and (if it is express) whether oral or in writing, whereby the individual undertakes to do or perform personally any work or services for another party to the contract whose status is not by virtue of the contract that of a client or customer of any profession or business undertaking carried on by the individual;

and any references to a worker’s contract shall be construed accordingly.’

### **General duties of limb (b) workers**

Generally, workers who come under limb (b):

- carry out casual or irregular work for one or more organisations
- after 1 month of continuous service, receive holiday pay but not other employment rights such as the minimum period of statutory notice
- only carry out work if they choose to
- have a contract or other arrangement to do work or services personally for a reward (the contract doesn’t have to be written) and only have a limited right to send someone else to do the work, for example swapping shifts with someone on a pre-approved list (subcontracting)
- are not in business for themselves (they do not advertise services directly to customers who can then also book their services directly)

As every employment relationship will be specific to the individual and employer, the precise status of any worker can ultimately only be determined by a court or tribunal.

**Please note:** These changes do not apply to those who have a ‘self-employed’ status.

## **5. Cleaning and maintenance of personal protective equipment**

Maintenance of PPE is mandatory under the PPE Regulations and includes where appropriate, cleaning, disinfecting, examination, repair, replacement and testing.

Manufacturers maintenance recommendations and instructions should normally be followed and any departure justified only after careful consideration.

Simple maintenance can be undertaken by a trained user who should also be trained to check and/or test that the PPE is in working order. More complex maintenance may require the services of appropriately trained and competent personnel.

Records of tests, inspections, repairs and maintenance should be retained including any associated certification for a period of 5 years.

## 6. Training

Staff must receive training and instruction on the proper use of even the most simple PPE and on its maintenance. Included in this instruction would be the purpose of the PPE, its limitations, how to use it, the care and maintenance of it, and the arrangements for reporting defects and obtaining replacements.

The extent of the training is dependent on the type of equipment and its use and the experience and knowledge possessed by the wearer. In many cases manufacturers/suppliers of PPE are willing to provide this training at little or no cost.

In addition to the training provided for users, Supervisors need to be trained to recognise hazards and assess the risks and select suitable PPE.

## 7. Further information

Health & Safety Executive – <http://www.hse.gov.uk/toolbox/ppe.htm>

HSE Guidance on the Regulations - <http://www.hse.gov.uk/pubns/priced/l25.pdf>

Health & Safety website – <https://staff.napier.ac.uk/services/governance-compliance/healthandsafety/guidance/Pages/PPE.aspx>

## Appendix A – Types of PPE

	Hazards	Options	Notes
<b>Eyes</b>	Chemical or metal splash, dust, projectiles, gas and vapour, radiation	Safety spectacles, goggles, face screens, face shields, visors	<ul style="list-style-type: none"> <li>• Make sure the eye protection chosen has the right combination of impact/dust/splash/molten metal eye protection for the task and fits the user properly</li> </ul>
<b>Head and Neck</b>	Impact from falling or flying objects, risk of head bumping, hair getting tangled in machinery, chemical drips or splash, climate or temperature	Industrial safety helmets, bump caps, hairnets and firefighters' helmets	<ul style="list-style-type: none"> <li>• Some safety helmets incorporate or can be fitted with specially-designed eye or hearing protection</li> <li>• Don't forget neck protection, e.g. scarves for use during welding</li> <li>• Replace head protection if it is damaged</li> </ul>
<b>Ears</b>	Noise – a combination of sound level and duration of exposure, very high-level sounds are a hazard even with short duration	Earplugs, earmuffs, semi-insert / canal caps	<ul style="list-style-type: none"> <li>• Provide the right hearing protectors for the type of work, and make sure workers know how to fit them</li> <li>• Choose protectors that reduce noise to an acceptable level, while allowing for safety and communication</li> </ul>
<b>Hands and Arms</b>	Abrasion, temperature extremes, cuts and punctures, impact, chemicals, electric shock, radiation, vibration, biological agents and prolonged immersion in water	Gloves, gloves with a cuff, gauntlets and sleeving that covers part or all of the arm	<ul style="list-style-type: none"> <li>• Avoid gloves when operating machines such as bench drills where the gloves might get caught</li> <li>• Some materials are quickly penetrated by chemicals – take care in selection, see HSE's <a href="#">skin at work website</a></li> <li>• Barrier creams are unreliable and are no substitute for proper PPE</li> <li>• Wearing gloves for long periods can make the skin hot and sweaty, leading to skin problems. Using separate cotton inner gloves can help prevent this</li> </ul>
<b>Feet and Legs</b>	Wet, hot and cold conditions, electrostatic build-up, slipping, cuts and punctures, falling objects, heavy loads, metal and chemical splash, vehicles	Safety boots and shoes with protective toecaps and penetration-resistant, mid-sole wellington boots and specific footwear, e.g. foundry boots and chainsaw boots	<ul style="list-style-type: none"> <li>• Footwear can have a variety of sole patterns and materials to help prevent slips in different conditions, including oil - or chemical-resistant soles. It can also be anti-static, electrically conductive or thermally insulating</li> <li>• Appropriate footwear should be selected for the risks identified</li> </ul>

	<b>Hazards</b>	<b>Options</b>	<b>Notes</b>
<b>Lungs</b>	Oxygen-deficient atmospheres, dusts, gases and vapours	<b>Respiratory protective equipment (RPE)</b> <ul style="list-style-type: none"> <li>Some respirators rely on filtering contaminants from workplace air. These include simple filtering face pieces and respirators and power-assisted respirators</li> <li>Make sure it fits properly, e.g. for tight-fitting respirators (filtering face pieces, half and full masks)</li> <li>There are also types of breathing apparatus which give an independent supply of breathable air, e.g. fresh-air hose, compressed airline and self-contained breathing apparatus</li> </ul>	<ul style="list-style-type: none"> <li>The right type of respirator filter must be used as each is effective for only a limited range of substances</li> <li>Filters have only a limited life. Where there is a shortage of oxygen or any danger of losing consciousness due to exposure to high levels of harmful fumes, only use breathing apparatus – never use a filtering cartridge</li> <li>You will need to use breathing apparatus in a confined space or if there is a chance of an oxygen deficiency in the work area</li> <li>If you are using respiratory protective equipment, look at HSE's publication <a href="#">Respiratory protective equipment at work: A practical guide</a></li> </ul>
<b>Whole Body</b>	Heat, chemical or metal splash, spray from pressure leaks or spray guns, contaminated dust, impact or penetration, excessive wear or entanglement of own clothing	Conventional or disposable overalls, boiler suits, aprons, chemical suits	<ul style="list-style-type: none"> <li>The choice of materials includes flame-retardant, anti-static, chain mail, chemically impermeable, and high-visibility</li> <li>Don't forget other protection, like safety harnesses or life jackets</li> </ul>
<b>Emergency Equipment</b>	Careful selection, maintenance and regular and realistic operator training is needed for equipment for use in emergencies, like compressed-air escape breathing apparatus, respirators and safety ropes or harnesses.		