



Policy on the Provision and Use of Personal Protective Equipment April 2021

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Responsible Director	Director of Human Resources and Organisational Development
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1. Policy Statement

NHS Greater Glasgow & Clyde (NHSGG&C) attaches the greatest importance to the health, safety and well-being of its employees and all other persons liable to be affected by its activities.

NHSGG&C will take all reasonable steps to ensure the safety of all employees. Where necessary, following appropriate risk assessments being carried out, the organisation will provide suitable and effective Personal Protective Equipment (PPE). NHSGG&C will liaise with suppliers to ensure that all PPE is to a relevant standard and will inform and train employees on the safe use of PPE.

Where the use of PPE has been identified as an appropriate control measure through risk assessment, then it is the duty of staff to appropriately use the PPE as provided. If employees have any problems relating to the use of PPE, they should immediately inform their Line Manager or Head of Department so that steps can be taken to promptly address the situation.

NHSGG&C will, in consultation with staff representatives:

- a) assess the provision and use of PPE which will include the assessment of its provision in the hierarchy of controls for example within The Control of Substances Hazardous to Health Regulations. (COSHH), Noise at Work Regulations.
- b) carry out an assessment of how the use of PPE affects staff whilst wearing the PPE
- c) take all reasonable steps to minimise the risks found from these assessments.

NHSGG&C will give information, instruction and training necessary to ensure the health and safety of all users of PPE.

The storage, cleaning, inspection and maintenance of PPE will be carried out in accordance with manufacturer's recommendations.

2. Scope of Policy Implementation

This policy is written in support of the general statements and principles as set out in the [NHSGG&C Health and Safety Policy](#).

3. Roles and Responsibilities

The framework of accountability and responsibility for managers and staff on the implementation of this policy follows that laid out within the Health and Safety Policy.

It is the responsibility of Health & Safety Management Manual Holders, Local Managers and Head of Departments to ensure that actions are in place to guarantee the implementation of the policy.

It is the Responsibility of all staff to appropriately use any PPE provided based on need following a suitable and sufficient risk assessment.

This policy cannot be read in isolation. Other Board policies give specific guidance and instruction on the appropriate selection and use of PPE. Examples would be COSHH Policy, Infection Control Manual / Guidance,.

Specific advice can also be sought from specialist advisors within the Health and Safety Service, Occupational Health and Prevention and Control of Infection.

Specific Actions:

1. PPE must be suitable for the ways in which it will be used (by design, construction) and used only for that purpose.
2. PPE must be selected to suit work conditions.
3. It is the responsibility of employees who have been provided with PPE to wear it at all times when engaged in the work requiring the use of PPE.
4. Employees may only be allowed to undertake work activities requiring the use of PPE when adequate information, instruction, training and supervision has been provided. This should be identified via KSF and PDP processes and appropriately recorded. Any necessary update refresher training should be handled in a similar fashion and should be part of the Training Needs Analysis section of the appropriate Health and Safety Management Manual.
In some instances related to specific PPE e.g. FFP3 masks specific instruction training and assessment will be required and the recording of same will follow a specific route.
5. Employees must immediately report to their line manager when PPE is not fit for purpose, either through wear and tear or failure to fit properly. Near miss incidents/ actual incidents involving PPE should also be reported utilising Datix.
6. Employees must report to line management where health concerns may impact on the selection of PPE. Occupational Health Services should be contacted in relation to any health concerns raised by the employee. Reference should be made to [NHS Health Surveillance Policy](#).

4. Personal Protective Equipment - Definition

Personal Protective Equipment at Work Regulations 1992 (as amended)

In this policy PPE means “*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 or safety, and any additional or accessory designed to meet that objective.*”

Uniforms are not classed as PPE.

Clothing provided solely for food hygiene is not classed as PPE.

5. Maintenance, replacement and record keeping.

It is the responsibility of Health & Safety Management Manual Holders/local managers to ensure that there is an adequate provision of PPE in both type, size and stock. That PPE is maintained (including replaced or cleaned as appropriate), in an efficient state, efficient working order and in good repair.

Written records regarding PPE are only required if the selection or maintenance of the PPE is complex e.g. when using respirators which require regular replacement of canisters.

Maintenance free [disposable] PPE does not require written records of use.

6. Safety Action/ Hazard Notices

NHSGG&C operates a centrally controlled distribution network for Safety Action and Hazard Notices. Key posts have been identified within the organisation to receive the notices and to decide on further local actions as required. On occasion these notices may refer to PPE and if so local assessments would need to be reviewed to reflect any new information.

[Safety Action Notice Policy.](#)

7. Risk Assessment

Before selecting PPE for any task a [risk assessment](#) of the task and any health and safety hazards which it may present must be undertaken by a competent person i.e someone who has received training in NHSGGC Risk assessment Policy, processes and use of the approved documentation.

PPE is only required if the risks cannot be reduced by other means, such as by the following control measures:

- 1] Using a substance which is less hazardous.
- 2] Engineering solution (for example, use of Local Exhaust Ventilation to remove harmful biological agents, to remove dust from a workshop or nail dust from Podiatry Clinic or reduce chemical concentrations in the air).
- 3] Looking at alternative methods of carrying out the task. Is the present method definitely the only way?

On occasions use of PPE will be the appropriate method e.g.

- 1] To supplement other measures and reduce the likelihood of harm.
- 2] When carrying out an emergency procedure e.g. when clearing up a blood or chemical spillage.
- 3] When carrying out a task of short term duration e.g. when performing venepuncture.

As PPE is the last resort after all other control measures have been taken into account, it is important to ensure that users wear PPE at all times when carrying out the task (that has identified the use of PPE as a control).

Appendix 1 provides a list of considerations that should be reviewed before PPE is provided.

8. Covid -19 PPE

8.1 Personal Protective Equipment

All staff must wear the PPE required for the area that they are working in or tasks they are undertaking, in line with the National Infection, Prevention and Control Manual. Where staff are unsure of requirements for a particular task or in a particular area they should seek clarification from their line manager or person in charge of the work area. Guidance, regularly updated, is available (including posters) on Health Protection Scotland Website:

- <https://www.hps.scot.nhs.uk/a-to-z-of-topics/covid-19/>
- Interim Guidance on the extended Use of Face masks Sept.2020 embedded document

Users of Face masks should undertake a pre-user check following the [Pre-user Checklist](#).

For information on correct use of PPE, including how to dispose of it safely, see our [PPE Donning & Doffing Poster](#)

Further guidance is available on [Training in use of PPE \(Masks etc\)](#) – Staff briefing pack issued and [HSE video issued on core brief](#).

8.2 Undertaking Fit Testing of Face Masks

- All staff who are required to work within an AGP area or undertake AGP must wear a FFP3 mask that has been fitted by a trained Face Fit Tester.
- NHSGGC policy is to retest staff who are identified as requiring to wear FFP3 as part of a three year cycle.
- Retesting will also be required within this timeframe if the model of mask being provided changes or where staff require due to changes to facial structure, e.g. significant dental work, weight gain / loss.
- Any Staff, Contractors or Volunteers undertaking face fit testing must be appropriately trained.
- Database of face fit testers held and updated by Health & Safety Service, available on HR Connect & Staffnet.
- Fit testers should follow current Government advice on social distancing (2metres) as they can observe and deliver verbal instruction from this distance.

- Both fit tester and those being fit tested should undertake hand hygiene before and after the test.
- Hand hygiene should be performed by Fit testers after cleaning of the tubes, hoods etc.

9. Respiratory Protective Equipment (RPE)

9.1 Guidance Notes

The inhalation of harmful dusts, mists, fumes, gases, vapours, etc. is recognised as a major health hazard in today's working environment. It is important that we remember that Respiratory Protective Equipment is the last line of defence and should not be considered unless the possibilities of engineering out or substituting the material involved are considered first.

Employees working in jobs where they may be at risk from an airborne contaminant[s] should be provided with the appropriate type of RPE. The type of protection provided should meet the relevant EN Standard for that device and should be suitable for the job/environment.

It is the duty of employees who have been provided with RPE to wear it at all times when engaged in the work requiring RPE to be used.

N.B. Advice

The selection and use of RPE is a complicated subject so it is important that problems associated with dust, mist, fumes, gases, vapours and oxygen deficiency should be referred to the Occupational Hygienist within the Health and Safety Service who will provide guidance on specific problems or on activities not covered in these guidelines.

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9.2 Selection of Respiratory Protective Equipment

Before consideration can be given to the selection of the correct RPE, an assessment should be made of the workplace, to identify the materials present, if they are hazardous, and what their potential health effects are.

From this an estimate of the potential levels of contaminant should be made, usually by monitoring the employee's exposure (seek guidance from Occupational Hygienist) Levels at the workplace should be compared with published acceptable levels, Workplace Exposure limits (WEL). (Consider providing info on where to access WEL) If the exposure is over the WEL, then control measures must be introduced to reduce employee exposure. RPE may be considered as one of the methods of controlling an individual's exposure.

If a material has a WEL the employee must not, under any circumstances, be exposed to levels above the WEL. A WEL is the maximum concentration, averaged over a reference period, which may be hazardous by inhalation.

Employers must take all reasonable precautions to ensure exposure is kept as far below the WEL as is practicable.

RPE works on one of two basic principals, either:

1. filtering out contaminants from the contaminated air, or
2. by supplying air from uncontaminated source.

The EN standard sets out the performance limits and details the information that must be supplied to the user.

Once a device is correctly selected, consideration must be given to the proper introduction to its users. They must be given adequate education on its use and the hazards it will protect against. Instruction should also be given to ensure that the device is fitted in accordance with the manufacturer's instructions. It would therefore be advisable to consider suppliers who supply adequate training in the proper use and care.

Appendix 1 - CHECKLIST

When considering the use of PPE the checklist given below should be considered. These points are provided to assist in the completion of a suitable and sufficient risk assessment and not as an alternative.

Is it appropriate for the task?	YES/NO
Is it of the right type?	YES/NO
It is comfortable enough?	YES/NO
Does it impair visibility or communication?	YES/NO
Does it interfere with the wearing of other PPE?	YES/NO
Does it fit - Is the size right?	YES/NO
Has adequate training been given on its use?	YES/NO
Is it inspected for wear and tear?	YES/NO
Is it properly maintained?	YES/NO
Is there suitable storage when not in use?	YES/NO
Are there procedures for reporting losses or defects?	YES/NO
Have staff been involved in the selection of the PPE?	YES/NO
Is PPE required under any specific risk assessment e.g. COSHH, IRR 99 (Radiation Regs), Control of Infection If so refer to it for guidance.	YES/NO

Appendix 2 - Collated list of Hyperlinks from within the policy

NHSGG&C Health and Safety Policy	https://www.nhsggc.org.uk/working-with-us/hr-connect/health-safety/policies-guidance-documents-forms/health-safety-policy/
NHS Health Surveillance Policy	https://www.nhsggc.org.uk/working-with-us/hr-connect/health-safety/policies-guidance-documents-forms/health-surveillance/
Safety Action Notice Policy	https://www.nhsggc.org.uk/working-with-us/hr-connect/health-safety/policies-guidance-documents-forms/safety-action-notice/
Risk Assessment	https://www.nhsggc.org.uk/working-with-us/hr-connect/health-safety/management-manual/risk-assessment/
Health Protection Scotland (COVID-19)	https://www.hps.scot.nhs.uk/a-to-z-of-topics/covid-19/
Pre-User Checklist for Staff at GGC	https://www.nhsggc.org.uk/media/263337/ffp3-disposable-mask-face-mask-pre-user-check.docx
PPE Donning & Doffing Poster	https://www.nhsggc.org.uk/media/259300/ppe-donning_doffing-poster-amended-mar-20-draft.pdf
Training in use of PPE (Masks etc.)	https://www.nhsggc.org.uk/media/264667/covid19_staff_face_masks_coverings.pdf
HSE video issued on core brief	https://www.nhsggc.org.uk/media/265069/024-core-brief-5-february-2021-daily-update.pdf