Face Fit Testing Requirements: What UK Law Expects

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Why a Good Seal Matters and What the Law Requires

Respiratory protective equipment (RPE) is used across construction, manufacturing, warehousing and many other sectors to protect workers from harmful dusts, fumes, mists, gases and vapours. Tight fitting masks, whether disposable filtering facepieces, half masks or full face respirators, only work as intended if they form an effective seal against the skin. Faces vary enormously in shape and bone structure, so a mask that performs well on one person can leak badly on a colleague even if both are wearing the same size.

Face fit testing is the practical check that confirms a specific make, model and size of mask actually seals against a specific wearer's face while they breathe normally, speak, bend and turn their head. Without that seal, contaminated air bypasses the filter and leaks in around the edges of the mask. However good the filter is, the protection it is rated for is lost for that wearer.

The duty to fit test flows from several pieces of legislation rather than a single rule. The Control of Substances Hazardous to Health Regulations 2002 require that where RPE is used as a control measure, it must be suitable for the wearer and the task. The Control of Asbestos Regulations 2012 and the Control of Lead at Work Regulations 2002 contain their own, more specific duties for those higher risk substances. The Management of Health and Safety at Work Regulations 1999 require employers to assess the risks, and the Personal Protective Equipment at Work Regulations 1992 require any PPE provided to be suitable and to fit the wearer.

Face fit testing is the recognised way of demonstrating that a tight fitting mask is suitable for the wearer in practice, not just in theory. The legal duty sits with the employer, or the self-employed person who would otherwise be exposed. Employees have a duty to cooperate and to use the equipment properly, but it is the employer's responsibility to arrange and pay for testing, and to keep the records that prove it has happened.

When Testing Is Required and How Often to Repeat It

Fit testing is not a one-off tick box exercise carried out at induction and then forgotten. It needs to happen at several points, and someone competent should track all of them.

- Before a tight fitting mask is relied upon for the first time, as part of selecting suitable RPE for the task
- Whenever the make, model or size of mask changes, even if the previous model passed comfortably
- Following any change that could affect facial shape, such as significant weight gain or loss, new dentures, facial scarring, piercings along the seal line, or facial surgery
- Periodically even where nothing has obviously changed, because faces alter gradually over time and fit cannot be assumed to remain valid indefinitely

There is no fixed legal interval for repeating a test, so you need to set a sensible schedule based on your risk assessment and write it down. Retest sooner for higher risk work and whenever anything changes. Build the schedule into your routine health and safety reviews rather than leaving it to chance.

Qualitative and Quantitative Testing Methods

There are two recognised approaches to fit testing, and the right one depends on the type of mask involved. Qualitative testing relies on the wearer's sense of taste or smell to detect a test agent such as a bitter or sweet aerosol sprayed into a hood worn over the mask. It is relatively quick and inexpensive, and it is suitable for disposable filtering facepieces and half masks, but it cannot be used for full face respirators and is not considered suitable for the highest protection factor equipment.

Quantitative testing uses specialised particle counting equipment to measure the actual leakage into the mask while the wearer performs a set of standard exercises. It produces a numerical fit factor rather than a simple pass or fail based on perception. It is suitable for all tight fitting masks, including full face respirators, and is generally regarded as the more objective method.

Facial Hair, Fit and Alternatives

Tight fitting masks cannot seal against facial hair. Even light stubble along the seal line will create channels for contaminated air to bypass the filter, regardless of how carefully the mask was selected or how well it fitted when clean shaven. Anyone who needs to wear tight fitting RPE must be clean shaven along the seal line, both on the day of the fit test and every time the mask is worn

afterwards.

Where an employee cannot or does not wish to shave, for religious, cultural or medical reasons, relying on a tight fitting mask is not appropriate. In these cases the employer should look at loose fitting alternatives such as powered air purifying hoods or visors, which do not depend on a skin seal, and should consult with the individual directly about what will work for them rather than assuming a single solution fits everyone.

Who Can Carry Out Testing, and What Good Practice Looks Like

Fit testing must be carried out by a competent person with adequate knowledge, training and practical experience of the test method being used. The Fit2Fit accreditation scheme provides independent assurance that a tester has demonstrated this competence. Accreditation is not itself a legal requirement, but it is widely treated as the benchmark and makes it much easier to demonstrate compliance if your arrangements are ever questioned.

A properly run programme looks like this in practice: every wearer has a documented fit test for every specific make, model and size of mask they will actually use at work, testing is repeated on a clear schedule and after any relevant change, and wearers are trained to carry out a user seal check every time they put the mask on, not just at the formal test. Storage, cleaning and maintenance of reusable masks also need to be managed so that a well-fitted mask does not degrade through poor care.

The most common failures include testing carried out once at induction and never repeated, a passed test being wrongly applied to a different mask model the business later switches to, wearers turning up with stubble on the day, no training on the user seal check, and records that cannot be found when they are needed.

Records and Who Is Responsible

You should keep a record for every fit test carried out, including the wearer's name, the date, the make, model and size of mask, the test method used, the pass or fail result, and the name and qualification of the tester. These records should sit alongside your wider COSHH risk assessment and RPE selection documentation, not as a standalone file that gets forgotten.

Overall responsibility sits with the employer or duty holder, but in practice this is usually delegated to a health and safety manager or competent person who administers the testing programme, while line managers make sure staff wear and check their RPE correctly day to day. Staff also take fit testing more seriously when they understand why it matters, and our COSHH Awareness training gives them that background.

Arrangements should be reviewed whenever a process changes, a new substance is introduced, new starters join a team that relies on RPE, or an audit identifies gaps. Businesses in sectors such as construction and manufacturing and engineering, where exposure to dust and fume is routine, tend to need frequent review, given staff turnover and the range of tasks involved.

Getting Your Arrangements Right

Integral Safety carries out onsite face fit testing at your premises across Coalville and the wider East Midlands, including dedicated local face fit testing in Leicester and surrounding areas, fitting sessions around shift patterns to minimise disruption. We can also review your wider respiratory protection arrangements as part of a broader health and safety consultancy visit, checking that the RPE selected matches the hazard and that your records would stand up to scrutiny. Get in touch to arrange testing or to talk through your current respiratory protection arrangements.

Talk to Integral Safety Ltd

We are health and safety consultants based in Coalville, Leicestershire, working with businesses across the East Midlands. If anything in this guide applies to your workplace, we can help.

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This guide is general information about UK health and safety law and practice, correct as at 11 November 2026. It is not advice on your particular circumstances. The latest version is at https://integralsafetyltd.co.uk/blog/face-fit-testing-what-the-law-requires-and-why-it-matters.