PPE at Work: Your Duties as an Employer Under the PPE Regulations

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Last Resort, Not First Response

Personal protective equipment sits at the bottom of the hierarchy of control for a reason. It protects only the person wearing it, it does nothing to remove the hazard itself, and it fails the moment it is worn incorrectly, damaged or left in the van. The Management of Health and Safety at Work Regulations 1999 require employers to assess risk and apply the principles of prevention, which means tackling the hazard at source and giving collective measures priority over individual protection before reaching for protective kit. PPE is what you use when the risk cannot be adequately controlled by other means, not a shortcut around them. Handing out gloves and calling it a risk assessment is not compliance, and it will not hold up to scrutiny.

That said, in many jobs PPE is necessary, and where it is, the Personal Protective Equipment at Work Regulations 1992 set out exactly what an employer must do. The 2022 amendment extended those duties beyond employees to limb (b) workers, meaning casual, agency and other workers who personally carry out work under a contract but are not employees. If your business uses casual labour, zero-hours staff or subcontracted individuals working under your direction, check whether they fall into this group, because the PPE duties may apply to them as well as to anyone on the payroll.

The Core Employer Duties

Provide it free of charge

Where the risk assessment shows PPE is needed, the employer provides it and cannot charge for it, make deductions from wages, or ask a worker to source their own. This includes replacements when equipment wears out through ordinary use, not just the first issue. Charging a worker for a replacement pair of cut-resistant gloves because they wore through the first pair on a normal shift is not permitted.

Make sure it is suitable

Suitable means matched to the actual hazard, the conditions, the duration of the task and the individual wearing it. That means checking the equipment is rated for the specific risk (a nuisance-dust mask will not protect against silica or isocyanates), that it actually fits the wearer, and that it does not interfere with other PPE worn alongside it, such as safety glasses breaking a respirator's seal. For tight-fitting respiratory protective equipment, fit is the whole point, so each wearer should have an individual face fit test before relying on it, because a mask that fits one face shape may leak badly on another. This is especially relevant in sectors like manufacturing and engineering, where welding fume, dust and solvent vapours are routine.

Train people to use it

Workers need to understand what the PPE protects against, when it must be worn, how to fit and adjust it correctly, how to spot damage or wear, and how to store and clean it. A hard hat left on a rear parcel shelf in direct sunlight, or a respirator rattling loose in a dusty toolbox, is being quietly degraded without anyone noticing until it fails when it is needed.

Maintain, inspect and replace it

PPE must be kept in good repair and stored properly when not in use. Many items have defined service lives or expiry dates, filters, cartridges and helmets being common examples, and these should be tracked rather than left until someone notices a problem. Build a simple inspection routine into supervision, rather than waiting for kit to visibly fail in use.

What a Compliant Arrangement Looks Like in Practice

A compliant PPE arrangement starts with the risk assessment identifying, item by item, why each piece of equipment is needed and what standard it must meet. From there, a business should hold an issue record showing what was given to whom and when, so there is evidence beyond memory that duties were met. Fit test records for respiratory protective equipment should note the mask make and model, the pass or fail result, and the date, because a pass on one model does not transfer to another.

Review frequency matters more than most employers assume. Risk assessments covering PPE should be revisited whenever the task, substance or equipment changes, or when something goes wrong. Beyond that, there is no fixed legal interval, so set a regular review that suits the business; many employers choose an annual one as part of routine health and safety management. Face fit

tests should be repeated if the wearer's facial characteristics change noticeably, for example through significant weight change, dental work or scarring, and many employers also retest periodically as sound practice, even though the interval is not fixed in law. Someone in the business, usually a supervisor or health and safety lead, should be clearly named as responsible for maintaining these records and chasing up gaps.

Common Failures Worth Checking For

Several patterns turn up repeatedly when PPE arrangements are reviewed:

- Equipment bought on price rather than suitability, leaving workers with kit rated for the wrong hazard or the wrong duration of exposure.
- One-size-fits-all stock that ignores the real variation in face and hand shapes across a workforce, particularly where women have historically been issued kit designed around male averages.
- No face fit testing carried out at all for tight-fitting respirators, or testing done once and never repeated when staff or equipment change.
- PPE combinations that clash, such as beards defeating respirator seals, or ear defenders pushed aside by safety glasses.
- No clear system for reporting damaged or lost PPE, so workers carry on with compromised equipment rather than face delay or paperwork.

Most of these come back to the same cause: the equipment was chosen once and never checked against the real task and the real wearer.

What Workers Must Do

Workers have duties of their own under the regulations. They must use PPE as trained, look after it properly, store it as instructed and report loss, damage or any fault promptly.

Make the reporting route easy. If getting a replacement pair of gloves means three forms and a week's wait, people will carry on wearing the damaged ones rather than go without.

Getting Buy-In and Keeping It Working

The difference between PPE that is worn properly and PPE that sits on a peg usually comes down to involvement and consistency. Let wearers trial options and have a genuine say in what is chosen, because comfort and dignity affect compliance far more than most managers expect.

Explain why each item matters, enforce the rules consistently regardless of seniority, and make sure supervisors are seen following the same standard. A site manager walking a construction site without the ear defenders everyone else is wearing has just rewritten the rules for anyone watching.

Where to Start

Begin by reviewing your risk assessments: is every item of PPE currently issued actually justified by a documented risk, and is anything missing that should be there? From there, check fit, training records, storage conditions and replacement intervals against what the task actually demands.

An independent audit or inspection is often the quickest way to surface gaps that routine supervision misses, and ongoing health and safety consultancy support can help build a PPE arrangement that works in practice rather than one that simply looks tidy on a shelf. Integral Safety works with employers across Leicestershire and the wider East Midlands, including from our base in Coalville, to get these arrangements right. Contact us to arrange a visit.

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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