

Personal Protective Equipment at Work Policy

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Trust Lead:	Neil Smith - Health and Safety Manager
Board Director Lead:	Mike Simpson - Director of Estates, Facilities & Sustainability
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DETAILS OF CHANGES MADE DURING THE REVIEW

Summary of changes 2023 review

1. Title page – Change Board Director Lead to Mike Simpson
2. Title page – Change Trust Lead to Neil Smith
3. Replace all references to the Health & Safety Services team with Health and Safety Team.
4. Update Key Words section to include Respiratory Protective Equipment (RPE)
5. Amendment to the Introduction
6. Remove reference to the The PPE (EC Directive) Regulations 1992 from Section 3.
7. Add Limb Workers, Respiratory Protective Equipment (RPE) and UKCA Marking to Section 3
8. Section 4 – addition of Clinical Directors / Clinical Management Group (CMG), Heads of Operations / Corporate Directors and Ward / Department Managers and Supervisors
9. Section 4 – under 4.4.6 add reference to protected characteristics and the Equality Act 2010.
10. Section 4 - addition of point 4.5.6
11. Section 4 – addition of 4.7 Contractors/Specialists
12. Section 5 – add reference to the Personal Protective Equipment at Work (Amendment) Regulations 2022, HSE L25 The Personal Protective Equipment at Work Regulations 1992 (as amended) Guidance on Regulations (fourth edition 2022) and to the HSE INDG479 (rev1) – Guidance on respiratory protective equipment (RPE) fit testing
13. Section 6 – Amend wording of 6.1 to provide more detail
14. Section 6 - addition of 6.2 reference to Fit Mask training for FFP3 masks
15. Review and update of the UHL policies listed in Section 9.
16. Update Section 10 – Process for Version control
17. Rename of appendix ‘Personal Protective Equipment Assessment From Guidance’ to ‘Management and Staff Guidance Note Personal Protective Equipment (PPE) in the Workplace’ and rewrite.
18. Removal of the Personal Protective Equipment (PPE) Assessment Form from the appendices.

KEY WORDS

Personal Protective Equipment (PPE), Respiratory Protective Equipment (RPE)

1 INTRODUCTION

- 1.1 This document sets out the University Hospitals of Leicester (UHL) NHS Trust (hereafter referred to as the Trust) arrangements for the identification, selection and provision of suitable PPE where this is identified as required to reduce risk.
- 1.2 The Trust will provide personal protective equipment (PPE) when the risk presented by a work activity cannot be adequately controlled by other means. All reasonable steps will be taken by the Trust to secure the health and safety of employees who use PPE. The use of PPE is an important means of controlling risk involved in various work activities; to ensure that it is effective it is necessary to follow the manufacturers and employers instructions on its correct use. Protective clothing, such as gloves, aprons, face protection and footwear is used in addition to normal clothing / uniform to protect both the patient and healthcare worker from the potential risk of cross-infection.
- 1.3 This policy should be read in conjunction with the 'Management and Staff Guidance Note Personal Protective Equipment (PPE) in the Workplace' and PPE Suitability assessment form which are available on INsite.

2 POLICY SCOPE

- 2.1 This policy applies to all staff, including temporary, agency, contractors, volunteer's trainees and students. The policy does not apply to non-employees but it may be necessary to provide PPE in order to prevent harm to non-employees e.g. laboratory coats to laboratory visitors. Self-employed contractors must comply with the requirements of the PPE at Work Regulations when working on Trust premises.

3 DEFINITIONS

- 3.1 **Personal Protective Equipment (PPE)**
Personal Protective Equipment means all equipment and products designed to be worn or held by a person at work to protect them against one or more risks to their health and safety.
- 3.2 **CE Marking**
CE' marking means that the product has been manufactured to a specific standard which conforms with European health, safety and environmental protection standards. PPE which conforms to the regulations will bear a 'CE' mark. However, it is important to note that the presence of a 'CE' mark does not signify fitness for purpose.
- 3.3 **Limb Workers**
Limb A – employees of an organization with a contract of employment (UHL substantive staff)
Limb B – workers who have a more casual employment relationship (Bank & Agency workers) are now included in the updated legislation amended 2022
- 3.4 **Respiratory Protective Equipment (RPE)**
Respiratory Protective Equipment is equipment designed to prevent or minimize the amount of hazardous substance to which the employee might be exposed to from entering the lungs. It includes breathing apparatus used for full-scale respiratory protection where there is no breathable atmosphere; through to disposable face masks used to prevent an employee inhaling dust particles.

3.5 **UKCA Marking**

The UKCA (UK Conformity Assessed) marking is a new UK product marking that is used for goods being placed on the market in Great Britain (England, Wales & Scotland). It covers most goods which previously required the CE marking.

4 ROLES WHO DOES WHAT

4.1 The UHL Health & Safety Policy for the Trust sets out the roles and responsibilities for all staff. Additional responsibilities to enable the effective management of risks where PPE may be required are detailed below.

4.2 **Executive Lead (Director of Estates, Facilities & Sustainability)**

To act as the executive lead and has the responsibility, accountability, and ownership for this policy together with its implementation.

4.3 **Clinical Directors / Clinical Management Group (CMG), Heads of Operations / Corporate Directors**

4.3.1 In addition to any other specific duties

- a. provide assurance to the Board Level Director for Health and Safety that effective Health and Safety Management arrangements are in place and functioning across their areas of responsibility.
- b. promoting and supporting the aims of this Policy.
- c. Ensuring that adequate resources are made available to meet the requirements of this policy.

4.4 **Service Managers / General Managers / Ward / Department Managers and Supervisors**

4.4.1 To assess the health and/or safety risks that staff are exposed to when they are at work.

4.4.2 To document work activity risk assessments in line with the UHL Health and Safety Policy.

4.4.3 Where risks are not suitably controlled managers will identify suitable PPE and assess suitability prior to choosing a final product by referring to and using the PPE assessment guidance and PPE Suitability assessment form.

4.4.4 Consult with staff and their representatives when identifying and selecting PPE.

4.4.5 To provide / replace as necessary, PPE to staff at no cost to the individual

4.4.6 To ensure that PPE provided is suitable and sufficient / fit for purpose, in an efficient state, in efficient working order and in good repair, taking into account any protected characteristics such as gender, pregnancy, race or any disability of the employee in line with the Equality Act 2010.

4.4.7 To ensure that all items of PPE are compatible where multiple items are to be worn or held by the user.

4.4.8 Provide suitable storage for PPE to protect the PPE from damage, contamination and loss when it is not being used.

- 4.4.9 To provide or arrange for information, instruction and training to staff in the correct usage of PPE, including the risks that exist for non-compliance with using/wearing PPE provided.
- 4.4.10 Monitor the arrangements and ensure that PPE is being used correctly.
- 4.4.11 Regularly review the risk assessment and/or if there is a reason to suspect that it is no longer valid and/or there has been a significant change in the matters to which it relates.
- 4.4.12 Investigate reports of concern, incidents or near miss events relating to PPE.

4.5. Employees – All staff must

- 4.5.1 Use PPE for its intended purpose/use
- 4.5.2 Not interfere with or misuse PPE provided for their protection.
- 4.5.3 Follow any information, training or instruction received in order to ensure that the equipment remains in good working order.
- 4.5.4 Where reusable items are provided these must be cleaned (if trained and competent to do so) and returned to the correct storage location after use.
- 4.5.5 Report any PPE loss or defect or any other issue with it to their manager (including any issue where any protected characteristics may prove wearing PPE difficult). It may also be necessary to report loss or defect on the Trust's incident reporting system (DATIX). Datix reports must be completed where exposure risks are identified or where near-miss events occur which could have resulted in exposure.
- 4.5.6 In the case of an adverse health condition, advise their line manager and request referral to the Occupational Health Service and contact their own General Practitioner.

4.6 Health and Safety Team

- 4.6.1 The Health and Safety Team will provide advice, guidance and information to support the work of managers and staff and where appropriate.
- 4.6.2 The Health and Safety Team may sign post managers to other relevant services i:e Infection Prevention team.

4.7 Contractors/Specialists

- 4.7.1 Where necessary the Trust will procure external contractors / specialists to advise on issues outside of existing competencies.

5 POLICY IMPLEMENTATION AND ASSOCIATED DOCUMENTS

- 5.1 The intended outcome of this policy is that:
 - Staff are provided with PPE that will protect the user from identified health or safety risks they are exposed to at work
 - PPE is used as intended by staff.

- Any shortcomings in the arrangements are reported and acted upon.

5.2 This policy is supported by the following associated documents as detailed below;

- The Health and Safety at Work, etc Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Personal Protective Equipment at Work (Amendment) Regulations 2022
- HSE L25 The Personal Protective Equipment at Work Regulations 1992 (as amended) Guidance on Regulations (fourth edition 2022)
- HSE INDG479 (rev1) – Guidance on respiratory protective equipment (RPE) fit testing

5.3 Where topic specific legislation applies to the activity or the hazard, additional responsibilities for PPE arrangements may be required.

6 EDUCATION AND TRAINING REQUIREMENTS

6.1 Information, instruction and/or training must be provided to staff and/or others at risk to ensure that they know the following:

Theoretical training should include:

- (a) an explanation of the risks present and why PPE is needed;
- (b) the operation, performance and limitations of the equipment;
- (c) instructions on the selection, use and storage of PPE. Written operating procedures such as permits-to-work involving PPE should be explained;
- (d) factors that can affect the protection provided by the PPE, such as the use of other protective equipment, personal factors, working conditions, inadequate fitting, and defects, damage and wear;
- (e) the ability to recognise defects in PPE and arrangements for reporting loss or defects.

Practical training should include:

- (a) practice in putting on, wearing and removing the equipment safely;
- (b) practice in inspection and, where appropriate, testing of the PPE before use;
- (c) practice in how to maintain the PPE to the extent that this should be done by the user (such as cleaning and the replacement of certain components);
- (d) instruction in the safe storage of equipment.

The extent of the training that is required will depend on the type of equipment, how frequently it is used, and the needs of the people being trained. As well as initial training, users of PPE and others involved with the equipment may need refresher training from time to time. Records of training details should be kept. Employers must ensure that, not only do their workers undergo the appropriate training, but also that they understand what they are being taught and why. Workers may have difficulty in understanding their training for a number of reasons. For example, the risks (and precautions) may be of a particularly complex nature, making it difficult for workers to understand the precise nature of the protective measures they must take. If English is not the first language of some workers, you should consider whether to give the training in a language they understand. To support training and enforce the need to wear specific PPE, especially in areas where additional hazards may exist,

employers should use safety signs at entry points, to indicate what PPE must be used.

6.2 Fit mask training for FFP3 masks

Fit mask test training is provided by the Trust for employees and workers where the wearing of Respiratory Protective Equipment (RPE) FFP3 masks has been identified as part of their duties and as part of the risk assessment process. This is a control measure to protect employees and workers against known/suspected infections spread wholly or partially by airborne routes and when undertaking aerosol generating procedures (AGPs). Training for all employees and workers is recorded and refreshed in line with

The Trust may use:-

- Qualitative fit testing method resulting in a pass or fail result. This involves the individual employee/worker undertaking a taste test using a sensitivity and fit test solution. This test is subjective detection and response by the wearer of the RPE. Suitable for disposable and reusable half mask; not suitable for full face masks.
- Quantative testing which provides a numerical measure of how well a facepiece seals against a wearer's face; this is called fit factor. These tests give an objective measure of face fit and are suitable for disposable and reusable half and full face masks.

A fit test should be repeated whenever there is a change to the RPE type, size, model or material or whenever there is a change to the circumstances of the wearer that could alter the fit of the RPE e.g. weight loss or gain, substantial dental work, any facial changes.

7 PROCESS FOR MONITORING COMPLIANCE

7.1 The standards for monitoring this policy are shown in the Policy Monitoring table set out below.

Element to be monitored	Lead	Tool	Frequency	Reporting arrangements
Staff are following the arrangements	Line manager	Observations Completion of the PPE Assessment form	As set by local manager. This may be influenced by concerns or incidents reported.	Notify any concerns to individual staff members / team. Report concerns with CMG Quality & Safety / Integrated Boards or wider Trust implications to the Health and Safety Team Ongoing concerns to be reported to the Health and Safety Team
Policy arrangements are in place,	Local Managers	Investigation of concerns, incidents, and	Annually	Report findings on Datix Feedback to individual/staff group

applied and effective	Health and Safety Team	near-miss events Audits and Inspections Investigation of RIDDOR reportable events	Annually	RIDDOR report including recommendations to key stakeholders including Local Health and Safety Group, UHL Health and Safety Committee and relevant CMG Quality & Safety / Integrated Boards
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8 EQUALITY IMPACT ASSESSMENT

- 8.1 The Trust recognises the diversity of the local community it serves. Our aim therefore is to provide a safe environment free from discrimination and treat all individuals fairly with dignity and appropriately according to their needs.
- 8.2 As part of its development, this policy and its impact on equality have been reviewed and no detriment was identified.

9 SUPPORTING REFERENCES, EVIDENCE BASE AND RELATED POLICIES

- 9.1 This policy was developed with reference to the Personal Protective Equipment at Work (Amendment) Regulations 2022 and related regulatory good practice guidance.
- 9.2 The following Trust documents are supporting policies that provide advice and guidance to managers and staff, to enable the safe management of services: This is not an exhaustive list and may be added to, as additional policies and guidance documents are created to meet identified needs:

Asbestos Policy	B27/2005
Asbestos Management Plan and Operational Procedures	B9/2021
Cleaning and Decontamination for Infection Prevention Policy	B5/2006
Control of Substances Hazardous to Health (COSHH) Policy	B10/2002
Core Training (Statutory and Mandatory) Policy	B21/2005
Electrical Low Voltage Management Policy	B27/2006
First Aid Policy	B23/2004
Health and Safety Policy	A17/2002
Health & Safety of Young People at Work Policy and Procedure	B52/2006
Incident and Accident Reporting Policy (including the investigation of serious, RIDDOR and security incidents and the maternity risk	

management policy)	A10/2002
Infection Prevention Policy	B4/2005
Ionising Radiation Safety Policy	B26/2019
Isolation Precautions Policy Including A-Z of conditions and Personal Protective Equipment	B62/2011
Latex – Allergy in Patients and Staff Policy	B29/2005
Managing the Health, Safety and Welfare of Contractors Policy	B24/2004
Noise Control Policy	B7/2004
Non-Ionising Radiation Safety Policy	B25/2019
Risk Management Policy	A12/2002
Uniform and Workwear Policy	B30/2010
Waste Management Policy	A15/2002
Work Equipment Policy	B8/2004
Work at Height Policy	B67/2011

10 PROCESS FOR VERSION CONTROL, DOCUMENT ARCHIVING AND REVIEW

- 10.1 This document will be reviewed on a three yearly basis unless earlier revision is required following internal audits and/or external guidance. The Health and Safety Team will be responsible for initiating the regular review of this policy.
- 10.2 Following ratification by the Trust Board and UHL Policy and Guidelines Committee new versions of this document will be uploaded onto SharePoint by Trust Administration and previous versions will be archived automatically through this system. Access for staff to this document is available through UHL 'INsite'.

1. Introduction

This document contains standards and guidance on the use of Personal Protective Equipment.

It is the responsibility of managers to ensure that any activities or operations that require the use of Personal Protective Equipment (PPE), is in line with the UHL Personal Protective Equipment at Work Policy and this document. Wherever there are risks to health and safety that cannot be adequately controlled in other ways, PPE should only be used as a last resort.

It is the responsibility of staff to use PPE for its intended purpose/use; not to interfere with or misuse PPE provided for their protection; to follow any information, training or instruction received in order to ensure that the equipment remains in good working order and to report and issues or faults with the use of PPE.

2. Procedure

Work activity risk assessments completed in line with the UHL Health and Safety Policy will identify your PPE requirements in order to reduce significant health or safety risks that are not controlled in some other way. Your risk assessment form can be used to identify suitable PPE, but if the risks are moderate or above it is recommended that you complete the PPE Assessment Form. The PPE Assessment Form together with this guidance will ensure that you have considered the factors necessary to comply with the Personal Protective Equipment at Work (Amendment) Regulations 2022

The level of action taken should be proportionate to the risk and additional advice/assistance can be obtained from the Health and Safety Team.

Characteristics of the PPE:

Once you have identified the hazard and harm from your risk assessment it should be possible to identify what the PPE is expected to do - these are referred to as the PPE characteristics. You should consider the properties of the hazard and how harm could occur. For example: protect from cuts / abrasions, protect from biological agents, protect from hot/cold surfaces, keep hands warm in cold weather, etc. You should also identify other characteristics to ensure that the work can be carried out. For example: gloves may be needed to protect from the cold but dexterity may also be needed to enable the operative to carry out the task effectively.

Once you have identified a suitable product you can complete the rest of the PPE Assessment to determine whether the product will satisfy job and legislative requirements. The following information is provided to assist you with your assessment:

1 Does the PPE have the required characteristics?

You should compare the required characteristics with the proposed PPE specifications. For example: If you have stated that the PPE must protect the user from heat then the specification of the protection should protect the user from the temperature they are likely

to be exposed to. If the product does not have the required characteristics or you are not sure then you must select 'no' and either identify another product or seek further clarity from the manufacturer.

PPE product information can be found on supplier websites e.g. <https://www.arco.co.uk/index> including the brand name, BSEN standard and product number. This will assist managers to choose the correct PPE.

2 Does the product bear the CE/UKCA mark?

When selecting PPE, choose good quality products. Ensure any PPE you buy is 'CE/UKCA' marked and complies with the requirements of the Personal Protective Equipment at Work (Amendment) Regulations 2022.

CE/UKCA marking signifies that the PPE satisfies certain basic safety requirements and in some cases will have been tested and certified by an independent body.

3 Procurement

PPE must be purchased via the UHL procurement process. The Procurement Team will ensure all products meet the relevant legislation, CE/UKCA mark and hold a Declaration of Conformity. You must not purchase PPE equipment and products via any other means (E.g. purchasing card, petty cash, or your own money)

- If in doubt, seek further advice.

4 The hazards and types of PPE

Eyes

Hazards: Chemical or metal splash, biological agent, dust, projectiles, gas and vapour, radiation, welding arc light, ultraviolet (UV) light.

Options: Safety spectacles, goggles, face-shields, visors.

Note: Make sure the eye protection has the right combination of impact/dust/splash /molten metal eye protection for the task and fits the user properly.

Head

Hazards: Impact from falling or flying objects, risk of head bumping, hair entanglement.

Options: A range of safety helmets, hard hats and bump caps.

Note: Some safety helmets incorporate or can be fitted with specially-designed eye or hearing protection. Also consider neck protection, e.g. scarves for use during welding.

Do not use head protection if it is damaged – replace it.

Breathing

Hazards: Dust, vapour, gas, oxygen-deficient atmospheres and biological agents.

Options: Disposable filtering face-piece or respirator, half- or full-face respirators, air-fed helmets, breathing apparatus.

Note: The right type of respirator filter must be used as each is effective for only a limited range of substances.

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. Filters only have a limited life; when replacing them or any other part, check with the manufacturer's guidance and ensure the correct replacement part is used. If you are using respiratory protective equipment, look at HSE's publication Respiratory protective equipment at work: A practical guide

Employees and workers can only wear FFP3 masks that they have been fit mask tested on.

Protecting the body

Hazards: Temperature extremes, adverse weather, chemical or metal splash, spray from pressure leaks or spray guns, impact or penetration, contaminated dust, excessive wear or entanglement of own clothing.

Options: Conventional or disposable aprons, conventional or disposable overalls, boiler suits, specialist protective clothing, e.g. chain-mail aprons, high-visibility clothing.

Note: The choice of materials includes flame-retardant, anti-static, chain mail, chemically impermeable, and high-visibility. Don't forget other protection, like safety harness, fall arrest harness or life jackets that maybe required.

Hands and arms

Hazards: abrasion, temperature extremes, cuts and punctures, impact, chemicals, electric shock, skin infection, disease or contamination.

Options: Gloves, gauntlets, mitts, wrist-cuffs, armllets.

Note: Avoid gloves when operating machines such as bench drills where the gloves could get caught. Some materials are quickly penetrated by chemicals so be careful when you are selecting them, see HSE's skin at work website (www.hse.gov.uk/skin)

Barrier creams are unreliable and are no substitute for proper PPE. 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. Be aware that some people may be allergic to materials used in gloves, e.g. latex.

Feet and legs

Hazards: Wet, electrostatic build-up, slipping, cuts and punctures, falling objects, metal and chemical splash, abrasion.

Options: Safety boots and shoes with protective toe caps and penetration-resistant mid-sole, wellingtons, job specific i.e. chainsaw boots, gaiters, leggings, spats,.

Note: 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. It is important that the appropriate footwear is selected for the risks identified.

Hearing

Hazards: noise from a combination of sound level and duration of exposure.

Options: Earplugs, earmuffs or semi-insert/canal caps.

Note: Provide the right hearing protectors that reduce noise to an acceptable level whilst still allowing for safety and communication.

5 Are there ergonomic factors to consider?

Will the weight or size of the PPE cause discomfort or mean that PPE is less likely to be used? Can this be overcome with change? For example: would 2-piece lead protection present fewer ergonomic concerns than a 1-piece apron?

6 Is the PPE (a) adjustable to fit the wearer or (b) available in a range of sizes?

The PPE must provide the protection necessary in order to be considered effective. It must fit the wearer. Consider gender specific PPE where appropriate.

7 Are there individual factors to consider?

You should consider the health of the person wearing the PPE. Certain materials should not be issued to staff if they are known to cause allergies, e.g. latex gloves. Bulky or ill-fitting items may exacerbate existing musculoskeletal problems. Some PPE may cause discomfort. Choose equipment that suits the wearer.

8 Is the PPE compatible with other PPE or clothing/equipment?

If more than one item of PPE is being worn they must be compatible with each other. Is the user able to effectively use the PPE with other clothing or equipment needed to carry out the task? Would the use of multiple items prevent one or more items fitting correctly? For example: respirator and goggles may not be compatible and therefore result in increased risk of eye and/or respiratory exposure.

9 Will the PPE create additional risk?

You should consider the task and the individual user(s). For example: will the field of vision be affected by the wearing of goggles? Does this present additional risk from hazards/signals the user may need to respond to, avoid or be aware of? Will the PPE result in user discomfort and present risk of error due to fatigue or heat. Will the PPE restrict movement?

10 Does the place of use (including storage) present any additional factors?

Will the environment where the PPE is to be used or stored cause the product to fail or deteriorate? Manufacturer information will advise you of the type of conditions to avoid (For example: the product may be affected by cold, heat, certain chemical properties, sunlight, etc.). You may need to identify alternative products, more frequent replacement of PPE or ensure that items are not exposed to conditions likely to affect them. This will ensure that the performance of the equipment is maintained.

11 Training

- Make sure anyone using PPE is aware of why it is needed, when to use, repair or replace it, how to report it if there is a fault and its limitations.
- Train and instruct people how to use PPE properly and make sure they are doing this. Include managers and supervisors in the training, they may not need to use the equipment personally, but they do need to ensure their staff are using it correctly.
- Keep a record of who has received training and on what PPE.
- It is important that users wear PPE all the time they are exposed to the risk. Never allow exemptions for those jobs which take 'just a few minutes'.
- Check regularly that PPE is being used and investigate incidents where it is not.
- Safety signs can be useful reminders to wear PPE, make sure that staff understand these signs, what they mean and where they can get equipment, e.g. for visitors or contractors.

12 Maintenance

Make sure:

- equipment is well looked after and properly stored when it is not being used, e.g. in a dry, clean cupboard, or for smaller items in a box or case;
- equipment is kept clean and in good repair – follow the manufacturer's maintenance schedule (including recommended replacement periods and shelf lives);
- simple maintenance can be carried out by the trained wearer, but more intricate repairs should only be done by specialists;
- replacement parts match the original, e.g. respirator filters;
- you identify who is responsible for maintenance and how to do it;
- employees make proper use of PPE and report its loss, destruction or any fault in it.

Make sure suitable replacement PPE is always readily available. It may be useful to have a supply of disposable PPE, e.g. for visitors who need protective clothing on an ad hoc basis.