

Controlling exposures to prevent  
 occupational lung disease

Respiratory Protective  
 Equipment (RPE) Guidance 3/5

3. Management  
 programme  
 including supervision  
 and enforcement



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Who should manage and supervise  
 an RPE programme?

You will need to assign someone to be responsible for the following:

- Setting up the programme
- Supervising RPE is worn correctly, on a daily basis
- Monitoring and managing sub-contractors

Once the roles are assigned, it is crucial that everyone understands who is responsible for each area, so you will need to communicate this.

How should RPE be issued to the  
 wearer(s)?

There are basically three ways RPE can be issued as follows:

- To the wearer, who keeps and is responsible for the particular piece of equipment, including all aspects of its proper use and care.
- To the wearer only for the one specific task requiring its use. After use, it is returned to the person responsible for the *Maintenance, Examination, Testing, Cleaning, Storage and Disposal of RPE* . This system is known as 'single issue and return'.
- Disposable RPE can be issued to each wearer, with it being disposed of immediately after one use, and where possible rendered unusable prior to disposal.

The table overleaf outlines the pros and cons of each method.

What are the legal requirements around  
 an RPE programme?

RPE is on the lowest section of the hierarchy of exposure controls covered by the Control of Substances Hazardous to Health Regulations 2002 (COSHH). Its use, therefore, is governed by the requirements of the COSHH Regulations with further possible considerations listed in the associated *Approved Code of Practice (L5: 6th Edition 2013)* .

Refer to the Breathe Freely COSHH guide for more information.

What can I do if people refuse to wear  
 RPE or don't wear it correctly?

It's critical that your workers are aware of the risks and potential consequences of not wearing their RPE, or of wearing it incorrectly. Where necessary, revisit the training they receive to ensure they are aware.

You should also ensure you involve your workers and gain their "buy-in" as wearers of RPE by including them in the RPE selection and decision process, and, in, so far as the RPE is suitable, allowing them some choice on the exact types selected.

**How should RPE be issued?** There are basically three ways RPE can be issued as follows:

Issue Method	Cons	Pros
RPE issued individually to the wearer, who keeps and is responsible for that piece of equipment, including all aspects of its proper use and care.	<ul style="list-style-type: none"> <li>• Issue is seen as relatively easy to manage; but is this managing all aspects required?</li> <li>• Works for either disposable or reusable RPE</li> </ul>	<ul style="list-style-type: none"> <li>• Relies on workers to be well trained and motivated</li> <li>• Storage, cleaning, testing and maintenance can be a challenge for workers</li> <li>• End of life may not always be recognised</li> <li>• Record-keeping more difficult</li> </ul>
RPE issued to the wearer only for the one specific task requiring the use of RPE. After use, the RPE is returned for maintenance, testing and cleaning etc.	<ul style="list-style-type: none"> <li>• Issue of correct RPE and consumables, such as filters, for both the task and the worker</li> <li>• Workers do not need to be trained on maintenance, testing and cleaning, and do not need space to store RPE correctly</li> <li>• Proper RPE disposal and replacement can be better managed</li> <li>• More effective and reliable record keeping</li> </ul>	<ul style="list-style-type: none"> <li>• RPE programme management may be seen as more complex</li> <li>• Clean central area required for maintenance, testing, cleaning and storage</li> <li>• Initially may need more items of RPE to guarantee supply</li> </ul>
Disposable RPE issued to each wearer, with it being disposed of immediately after <b>one</b> use. <i>This may be for just one task of work involving high risk situations or one shift.</i>	<ul style="list-style-type: none"> <li>• Simple concept, relatively easy to manage</li> </ul>	<ul style="list-style-type: none"> <li>• RPE may be reused and performance degraded</li> <li>• RPE may be used by others increasing risk of infectious disease transfer</li> <li>• Can be costly in the longer term</li> <li>• Disposal can be problematical, i.e. left strewn around site</li> </ul>

**RPE seems very expensive - is there any way I can manage the costs down?**

You should not look for cost-saving measures, such as buying cheaper alternatives, once you have made your RPE selection.

However, you can try and influence the design stage of a project to encourage the specification of higher forms of exposure control, such as local exhaust ventilation, which could reduce the need for RPE.

It is also worth noting that proper use of RPE by a well-trained workforce can often reduce the time a job would have otherwise taken. And the knowledge that their health is being protected can improve workers' morale and lower any stress they may feel about working with hazardous materials.

**The work being done only involves exposures for a very short period of time – so is RPE really needed at all times of exposure?**

Where your risk assessment has identified that RPE is required, then it should **always** be used with no exceptions!

Entering a hazardous area without wearing RPE or removing RPE, even for just very brief periods of time, can result in exposure which exceeds the exposure limit and can cause harm to health.