

LEAFLET 13**MANAGEMENT OF PERSONAL PROTECTIVE EQUIPMENT****CONTENTS**

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LEAFLET FOR LINE MANAGERS**SCOPE**

1 This Leaflet is intended for use by all personnel who have a responsibility for the assessment, selection, provision, maintenance, use or disposal of Personal Protective Equipment (PPE). Its objective is to:

- 1.1 Enable a basic understanding of the relevant aspects of the Personal Protective Equipment (EC Directive) Regulations 1992; and
- 1.2 Ensure compliance with the Personal Protective Equipment at Work Regulations 1992, and other regulations (listed in the accompanying guidance to this leaflet) dealing with selection, use and maintenance of PPE.

DEFINITIONS**Personal Protective Equipment**

2 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.

NOTE

There are exclusions written into the two statutory instruments listed above, but in principle all equipment which provides employees with protection whilst at work should comply with the requirements and guidance in this Leaflet, even if not specifically covered by the legislation.

CE Marking

3 'CE' Marking means that the product has been manufactured to a specific standard (not necessarily a recognised UK or EU standard). The PPE (EC Directive) Regulations 1992 set the basic health and safety requirements for PPE, EC type examinations for all but simple PPE, and the EC quality control requirements for PPE of complex design. The regulations therefore set the design, manufacturing and quality control standards for PPE. 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.

4 For further clarification on these definitions see JSP437.

DUTIES

Head of Unit/Establishment

5 The Head of Unit/Establishment has overall responsibility for the health and safety of all staff on the unit/establishment. As such, part of his/her duty is to ensure that appropriate instructions, systems and procedures are in place to manage the use of PPE on the unit or establishment.

Line Manager

6 The Line Manager (LM) assumes day-to-day control and responsibility for all his/her staff. With regard to PPE, the LM has the following duties:

- 6.1 Where a requirement for PPE is specified as part of a risk assessment, ensure that a further assessment is made to determine the most suitable PPE for a particular application; and if the circumstances demand the person who will use it.
- 6.2 Ensure that any PPE is provided free of charge and is worn;
- 6.3 Ensure that maintenance and the records, testing, cleaning, storage and disposal procedures are in place and are followed;
- 6.4 Ensure that adequate information, instruction and training is provided.

Employees

7 All employees must:

- 7.1 Use any PPE supplied to them in accordance with the training or instruction received;
- 7.2 Where applicable, ensure that it is properly stored in the accommodation provided when not in use;
- 7.3 Report immediately to their LM any loss or defect in the PPE provided to them;
- 7.4 Check PPE serviceability immediately prior to use.

PPE PROVIDED BY OR TO NON-MOD PERSONNEL

8 Where PPE is supplied by MOD to non-MOD staff, the responsibility for the equipment remains with MOD. Line managers therefore have a duty to ensure that procedures are in place to select, adequately maintain, and where necessary train non-MOD staff in the use of the equipment.

9 Where PPE is provided by a contractor to MOD staff, the line manager still has a duty to ensure that the PPE provided is adequate. He must also check that adequate arrangements are in place to ensure that requirements such as PPE maintenance are met.

RECORDS

10 Records of PPE assessments are to be kept by the line manager for at least two years after they are no longer extant.

11 Records of maintenance and inspection checks are to be kept by the person appointed to undertake the checks for a period of two years after the item ceases to be used.

12 Records of any training undertaken in respect of use and/or maintenance are to be kept by the line manager with a copy sent to be included on the individuals long term personal file.

RELATED LEAFLETS AND JSPS

13 Related Leaflets & JSPs

- Leaflet - Substances Hazardous to Health
- Leaflet - Noise at Work
- Leaflet - Work in Confined Spaces
- Leaflet - Permit to Work
- JSP437 Personal Protective Equipment Catalogue

LEAFLET 13 ANNEX A

MANAGEMENT OF PERSONAL PROTECTIVE EQUIPMENT

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GUIDANCE FOR LINE MANAGERS

GENERAL

1 The following guidance expands on the duties given in the Leaflet, by providing a step-by-step approach to choosing and using PPE. Whilst it is by no means exhaustive and cannot cover all situations, the guidance given can be used to form the basis for local operating procedures and instructions. Although hazard analysis and risk assessment are covered in detail in other Leaflets, their inclusion here is an assertion that good PPE management begins by considering whether PPE is necessary in the first place.

HAZARD ANALYSIS

2 A hazard analysis will identify areas or tasks which need to be subject to a risk assessment. For information on this topic, refer to Leaflet - Health and Safety Risk Assessment.

RISK ASSESSMENT

3 Risk assessments made under various regulations¹ enable the hazards present to be evaluated in a logical and objective manner. The process may require the use of measuring instruments to quantify the hazard present and the degree of risk that it poses. The services of a professional occupational hygienist may be required in some circumstances, such as for air sampling or noise monitoring. A list of contact points is provided at the end of this Leaflet.

4 The outcome of the risk assessment will be a decision on whether the existing controls are adequate, or whether further controls are required to reduce the risk. In the latter case, the standard hierarchy should be applied to determine the most practicable solution. The following guidance assumes that a PPE solution has been adopted.

5 Use is made in some areas of MOD of generic risk assessments that result in a recommended PPE product being defined for a task. Caution must be exercised in applying these generic assessments, as subtle local variations may impair or detract from the protection afforded. The Line Manager carries responsibility for verifying the application of generic assessments.

PPE ASSESSMENT

6 The purpose of the PPE assessment is to identify the protective characteristics that the PPE product requires, and the performance level of each characteristic. Once identified, these characteristics should be compared with manufacturer's literature and/or British or European Standards for the type of product concerned. Reference should be made to JSP437 - the Personal Protective Equipment Catalogue, or an appropriate catalogue of standards.

NOTE

The PPE assessment follows on from, but does not duplicate the risk assessment.

¹ Management of Health and Safety at Work Regulations 1999; Control of Substances Hazardous to Health Regulations 1999; Noise at Work Regulations 1989; Manual Handling Operations Regulations 1992; Control of Asbestos at Work Regulations 1987; Ionising Radiations Regulations 1999; Control of Lead at Work Regulations 1980; Construction (Head Protection) Regulations 1989.

QUALITY OF PERSONAL PROTECTIVE EQUIPMENT

7 The Personal Protective Equipment (EC Directive) Regulations 1992 specify the requirements on suppliers to provide equipment which conforms to a standard. Only equipment which meets a standard can be given a 'CE' Mark. For PPE protecting against low risks (eg gardening gloves), the manufacturer is allowed to certify that the equipment meets a standard or the basic safety requirements. For equipment of higher complexity, which provides protection against higher risks, the equipment must conform to a recognised European or British standard.

8 It is illegal for manufacturers or suppliers to sell PPE unless it is 'CE' marked, although there are exemptions for certain military applications.

9 Some MOD activities associated with military operations may require civilians to use PPE designed specifically for use by the services. This PPE may not have 'CE' marks. If no 'CE' marked civilian equivalent PPE is available civilians can use military PPE to reduce the risk to their health.

PPE SELECTION

10 The majority of PPE provided by MOD is detailed in JSP437. Reference should be made to this document to identify suitable products that provide the characteristics identified by the PPE assessment.

11 Issues to consider when selecting PPE are:

Nature of the task

12 Physical effort required. Some items of PPE restrict the level of physical effort able to be undertaken by the wearer e.g. negative pressure respirators, and this must be considered when selecting appropriate equipment.

13 Method of working. The use of PPE may necessitate a revision of working practices to accommodate any restrictions imposed by its use.

14 How long the PPE is to be worn. Some types of PPE e.g. gloves or filters may be susceptible to breakthrough when exposed to substances such as solvents. The duration of use should not, therefore, exceed the breakthrough time quoted by the manufacturer. In addition, the longer the PPE is to be worn, the greater the likelihood of discomfort to the user, which may ultimately result in removal of the PPE before the task is complete.

15 Requirements for visibility and communications. The wearing of PPE, particularly eye protection, hearing protection and respiratory protection can seriously impair the wearer's field of vision and/or hinder effective communication.

16 Ergonomic considerations such as the need for mobility or dexterity which will be reduced by items of PPE. For example, the use of thick rubber gloves to protect against chemicals will affect tactility, and the use of compressed air-fed breathing apparatus will restrict mobility.

Compatibility with other PPE

17 Where the effectiveness of an item of PPE might be reduced when used in combination with another item of PPE. One example could be safety spectacles breaking the seal of a respirator or hearing protectors.

Environmental extremes

18 E.g. temperature, humidity, air movement. Where PPE is required in unusual environmental conditions, it is important that any restrictions specified by the manufacturers are considered in the selection process.

Maintenance, inspection, testing and training requirements

19 The level of maintenance etc required on the PPE may well influence the decision on the most suitable PPE for a task. For example, if the choice is between a disposable face mask and a non-disposable respirator (all other things being equal), it may be simpler and cheaper to use the disposable PPE, rather than clean, maintain etc the non-disposable equipment. However, a cost/benefit analysis may show that the extra costs associated with procuring disposable respirators outweigh the maintenance costs. In every case, the source of the funding must be established and the agreement of the budget holder(s) obtained to ensure adequate funding is available.

User variations

20 There will be considerable differences in the physical dimensions of different workers and therefore more than one type or size of PPE may be needed. The user should be consulted and involved in the selection, as there is a better chance of PPE being used effectively if it is accepted by the wearer. In some MOD situations this may not be possible as the level and type of protection required will be specified in operating instructions, unit orders etc.

Any health problems of those required to wear the PPE

21 PPE will usually create an added physiological burden on those required to use it. Persons suffering from existing health problem may find the PPE exacerbates their condition. e.g. asthma sufferers may have problems wearing negative pressure respirators which increase breathing resistance. Again, the user should always be consulted and asked whether there are any medical problems which may affect their ability to wear the PPE. In cases of doubt, the relevant occupational health provider should be consulted.

Over-protection

22 If there is a choice of product with varying performance level, the opportunity exists to over-protect in the apparent interests of safety. This course of action should be carefully considered, as higher protection levels may create isolation, inflict a greater physiological load on the PPE user, and may increase costs. It may also involve far more onerous maintenance, inspection and training requirements.

PPE Availability

23 The current and future availability of the selected PPE, in the desired quantities, needs to be confirmed with the source of supply. This is particularly important where items are procured directly from a supplier (i.e. not through MOD sources).

PPE VERIFICATION

24 Prior to introducing a new item of PPE, it is recommended that a sample item be obtained for evaluation. This will enable physical examination, simulated use, confirmation of performance characteristics and scrutiny of user instructions supplied by the manufacturer that will direct care and maintenance regimes.

PPE ISSUE AND IN-LIFE MANAGEMENT

25 Once the selection decision on the make and model of PPE for the specific application has been made, the following matters relating to issue and in-life management need to be addressed:

Personal/Pool Issue

26 The method by which PPE is issued needs to be evaluated to balance the economy of provision against the risk to personnel. Next-to-skin items (such as respirators) are normally regarded as personal issue for hygienic reasons, eye protection that involves the use of corrective lenses would also be a personal issue. Greater detail concerning the provision of eye protection is contained in Annex B to this leaflet. However, there may be circumstances where individual issue is impracticable or where visitors require next-to-skin items. In such circumstances either disposable PPE should be used, or a stringent cleaning/disinfecting process should be adopted.

Care

27 Reusable PPE will require a care regime to ensure it remains in a hygienic state. The regime will be detailed in the manufacturer's instructions and may be as simple as the user washing the mask in warm, soapy water to a laundry contract being required for dirty coveralls. Caution should be exercised as improper care can impair performance, reduce product life or render the product unusable.

Maintenance & Repair

28 Many PPE products are maintenance free, in that when used to exhaustion they are merely replaced, whilst others may require periodic servicing and sometimes repair to maintain safe performance throughout their useful life. Maintenance and repair requirements will be detailed in the manufacturer's instructions and must only be carried out by those persons authorised to do so. This may be the user (e.g. to change a respirator filter), appropriately trained MOD personnel (e.g. to strip down and maintain self-contained breathing apparatus), or the manufacturer/agent (e.g. to re-charge an air cylinder).

Alterations or modifications

29 PPE must not be subject to any unauthorised alterations or modifications. Such actions may impair the protection afforded to the user and will invalidate the 'CE' marking and equipment warranties. Any requests for alterations or modifications should be directed to DCT IPT (see contact point below) and/or the equipment manufacturer.

Inspection & Testing

30 The frequency and depth of inspection/testing required will vary depending on the type of equipment, and may be mandated by legislation or manufacturer's instructions. All PPE must be subject to a pre-use operative's inspection to confirm it is in sound condition and serviceable.

31 Responsibility for the care, maintenance, inspection, repair, testing etc should be laid down in local operating procedures, together with the actual procedures to be followed and their frequency. The manufacturer's instructions will form the basis for these local operating procedures.

STORAGE AND SHELF LIFE

32 Adequate storage facilities must be available for PPE in both the following contexts:

Prior to issue

33 Items of PPE may be stored for lengthy periods in central or local stores facilities. It is essential that:

33.1 Stocks are rotated as a number of types of PPE have defined life and shelf times (e.g. head protection) and must be scrapped at the end of that period.

33.2 Any person who is issued with an item of PPE from a store checks the 'use by' date (if applicable) to ensure it is still fit for use.

33.3 PPE is stored in an appropriate manner as detailed by the manufacturer. For example, some products are sensitive to UV exposure whilst others must be stored sealed in their original packaging if they are to remain serviceable.

Once issued

34 It is essential that adequate facilities are made available for PPE to be safely stored when not in use. The storage should protect the PPE from contamination, loss, or damage by (for example) harmful substances, damp, or sunlight. The storage facility should be suitably marked or labelled, and any equipment ready for use should be clearly segregated from that which is awaiting repair, maintenance or cleaning.

INFORMATION, INSTRUCTION AND TRAINING

35 The extent of any information, instruction and training will vary with the risk and complexity of the PPE. In the simplest cases (e.g. gloves) the level of information required may be written on the packet. More complex equipment (e.g. air-supplied respiratory protection) may require a lengthy instruction course with practical examination. In respect of any information, instruction or training supplied Line Managers must ensure that:

35.1 Records are produced and kept of any training provided.

35.2 Any information, instruction provided is comprehensible to each person that it is provided.

35.3 Information provided to persons to ensure the efficient working state of the PPE is kept readily available for the persons.

35.4 They consider, where appropriate, the repeating of any demonstrations necessary to train persons in the wearing of PPE, at suitable intervals.

36 The following elements should normally be included, except for the most simple PPE:

Theoretical Training

37 An explanation of the hazards and risks present in the work process and why the PPE is needed.

38 The purpose for which and the manner in which the PPE is to be used.

39 The operation, performance and limitations of the PPE.

40 Any action needed by the employee to ensure the PPE remains in an effective state and in good repair.

41 Instructions on the selection, use and storage of PPE related to the intended use. Any written procedures, such as permits to work, should be explained.

42 Factors, which could affect the protection, afforded by the PPE such as: other PPE; personal factors; working conditions; inadequate fitting; and damage.

43 Methods of recognising defects in PPE and arrangements for loss/defect reporting.

Practical Training

44 Practice in putting on, wearing, and removing the equipment.

45 Practice and instruction on inspection and, where appropriate, testing of PPE before use.

46 Practice and instruction in any maintenance, which can be done by the user, such as hygienic cleaning.

DISPOSAL

47 The fact that PPE is often required to protect against hazardous materials means that it may end up contaminated at the end of its life. The extent of any contamination should be assessed and precautions taken to either thoroughly clean the PPE or to dispose of it in accordance with local instructions via the appropriate waste stream. For example, a respirator filter used to protect against solvents may need to be disposed of as special waste.

MONITORING AND AUDIT

48 Supervision and monitoring of operatives wearing PPE must be undertaken by the Line Manager, as well as during audits and inspections. These checks should ensure that the PPE is being used by the operatives in accordance with laid down procedures. Feedback should also be obtained to identify any improvements in safety, comfort, effectiveness or economy that experience may generate.

49 The management of PPE at a site or establishment should be subject to audit and inspection in the same way as any other aspect of health and safety.

REVIEW

50 As part of the ongoing process of improving health and safety performance, periodic reviews of all aspects of the PPE management process should be undertaken. In particular, risk and PPE assessments should be reviewed at regular intervals (e.g. every two years or when there are any significant changes to the process), as improvements in technology and other factors may reveal alternative solutions. Indeed, one such solution may obviate the need for PPE altogether.

PPE PROVIDED BY OR TO NON-MOD PERSONNEL

PPE provided to visitors to MOD sites

51 There will be occasions where visitors to MOD sites need to be provided with MOD-owned PPE. In these circumstances it is essential that the controls which are exercised on issuing the PPE to MOD staff, are mirrored when issuing to non-MOD staff. In particular, it is vital that adequate training is provided to ensure the equipment is worn correctly and any problems with the equipment are reported immediately.

PPE in Contracts

52 The provision of MOD-owned PPE to contractors is not recommended for legal, financial and management reasons. Contracts should always specify that contractors provide their own PPE unless the written consent of the MOD provider of such items has been obtained. Where PPE is supplied by MOD to non-MOD staff as part of a Contract, the responsibility/liability for the equipment remains with MOD. Line managers must therefore ensure that management procedures are in place to select, adequately maintain, and where necessary train non-MOD staff in the use of the equipment.

PPE provided to MOD staff by Third Parties

53 Where staff are provided with PPE by a non-MOD organisation, for example when visiting a contractor's site, the line manager of the staff concerned must satisfy himself that the contractor has procedures to ensure that suitable equipment is provided. Though the responsibility for the equipment and its maintenance are on the contractor, the line manager should ensure that any other factors affecting the continued effectiveness of the PPE, such as maintenance, are addressed. Under no circumstances should alterations or repairs be undertaken on non-MOD PPE, as this may invalidate equipment warranties and make MOD and/or its staff liable in the event of an incident.

RECORDS

Assessments

54 In the simplest and most obvious cases which can be easily repeated and explained at any time, the PPE assessment and selection process need not be recorded. In more complex cases, it will need to be recorded and kept readily accessible to those who need to know the results. The assessment will need to be reviewed if there are any significant changes in the work to which it relates.

Inspections

55 Where appropriate, records should be kept. This will depend on the type of equipment, but it is good practice to maintain records of all inspections and any maintenance, testing, or repairs undertaken. A PPE Inspection Record form is included at Annex A, Appendix 1, to assist this process.

POINTS OF CONTACT

56 The following points of contact may provide additional information:

- PPE Policy Issues - relevant Service/TLB Health and Safety Focal Point
- PPE Products - Technical Advice [DC IPT to provide]
- PPE Products - Availability/supply advice [DC IPT to provide]
- Occupational hygiene advice/monitoring - In the first instance contact the relevant Service/TLB Health and Safety Focal Point.

LEAFLET 13 ANNEX A APPENDIX 1**MANAGEMENT OF PERSONAL PROTECTIVE EQUIPMENT****PPE INSPECTION RECORD****1. PPE User**

(Where issued to an individual)

Surname

Initials

Staff/Service No.

2. Location of PPE being checked

(Specify the normal storage position for the equipment at the Unit/Branch/Establishment where it is used)

Unit/Branch/Establishment

Building

Room/Lab/Workshop

3. Equipment to be checked

(Specify the details of the equipment to be checked. The identification number should be unique to a specific item.)

Manufacturer

Model

Local Identification No.

4. Checks required

(Based on the manufacturer's guidance, list the equipment checks required)

5. Monthly Inspection results for PPE specified

(Specify date of inspection, name and signature of persons examining equipment and any comments. The comments may simply be 'All Checks OK' or may recommend remedial action.)

[illegible]

LEAFLET 13 ANNEX B**MANAGEMENT OF PERSONAL PROTECTIVE EQUIPMENT****CONTENTS**

Para

PROTECTION OF EYES

- 1 Introduction
- 3 Provision of spectacles
- 9 Provision of prescription lenses for safety spectacles (PSS)

PROTECTION OF EYES**INTRODUCTION**

1 Eye protection is to be available to all employees whose safety or health is at risk because of the work they perform or other environmental factors present at their place of work. Whenever possible, processes or materials, which are hazardous to eyes, should be replaced or the hazard contained or controlled at source.

2 It is a line management responsibility to assess the work process to determine potential eye hazard risks and after exhausting other control techniques ensure the adequate provision of suitable eye protection to reduce the risk. There is an obligation on all employees to use and take care of equipment provided and to ensure their work does not place the eyes of others at risk, e.g. welders must shield the electric arc.

PROVISION OF SPECTACLES

3 The provision of spectacles to achieve a satisfactory standard of vision for employment where no other safety factors are involved is the responsibility of employees, except in the case of spectacles for work with VDUs (See Leaflet 24 Working with Display Screen Equipment)

4 Line Managers are to make an assessment of the work activity; wherever possible, processes or materials, which are hazardous to eyes, should be replaced, or the potential risk contained or controlled at source.

5 Personnel provided with eye protection are to use it properly and take care of the equipment. Eye protection is to be comfortable to the wearer, efficient in performance, and accord with statutory requirements. Where the hazard cannot be contained at source individual eye protection is to be provided on a personal basis to those at risk.

6 Special consideration is to be given to the effective protection of visitors in designated areas, by the provision of protective screens or other appropriate eye protection. The number of personnel placed at risk is to be reduced by:

- 6.1 Designating areas where eye protection must be worn;
- 6.2 Clearly marking these areas in accordance with the Health and Safety (Safety Signs and Signals) Regulations 1996; and
- 6.3 Restricting entry to essential personnel wearing appropriate eye protection.

7 Personnel provided with eye protection are to be trained in its use and maintenance. Any loss, destruction or defect in equipment is to be reported. Facilities are to be provided for safe storage when not in use and for assisting users in caring for the equipment. Supplies of lens cleaning fluid and tissues are to be kept available in clearly marked containers.

8 Where fixed or portable screens are used they are to be inspected daily to ensure that they are in serviceable condition. Special attention is to be paid to transparent screens fixed to machines, to ensure that vision is not significantly impaired by pitting, scuffing, ageing etc; screens are to be replaced when this occurs. Where protective screens are used in explosives processes, only those type-tested and certified to provide protection are to be used.

PROVISION OF PRESCRIPTION LENSES FOR SAFETY SPECTACLES (PSS)

9 The provision of PSS is only justified in special circumstances where no other satisfactory method of eye protection (e.g. box goggles, visors, fixed screens) of eye protection can be achieved. Requests for advice on the provision of safety spectacles with prescription lenses can be made as follows: Unit medical officer, Unit Safety Advisor, or the staff of the Service /DLO/Centre Chief Environment and Safety Officer (CESO).

10 Single vision safety lenses are obtainable to meet the requirements of BS EN 166 Grade 2 Impact Standard for virtually all prescriptions; frames and side shields to meet the same standard are also available. In rare cases where prescriptions to this standard cannot be met or in cases where protection is required above Grade 2 Impact Standard, prescription safety spectacles are not to be authorised; the most suitable alternative protection is to be provided. If an armoured prescription lens is necessary an approved safety frame is to be provided to the optician for glazing.

11 Approved safety frames will not be automatically renewed when replacements become due unless the authorities are satisfied that the employee is still at risk. The provision of non-conducting spectacle frames for personnel exposed to high voltages can also be met by the use of approved safety frames. Flat design frame arms are to be supplied where there is a need for the worker to wear ear defenders concurrently with safety spectacles. It must be stressed that the provision of prescription safety spectacles is a safety measure; therefore the most economic practicable frames are to be provided without regard for their aesthetic qualities. The authority for provision of safety spectacles rests with the budget-holder concerned. Permission, from the budget manager, must be obtained before any purchase agreement is entered into.

12 In certain processes (e.g. where vapours, gasses, mists, dusts, liquids, swarf etc are the hazard) the supply of PSS may not be appropriate and goggles of the correct type will give adequate protection.

13 Where civilian staff have been authorised to obtain PSS from an optician, the cost of the PSS and any accompanying eye test will be borne by the department. Such cost will fall to the local budget-holder, who will arrange reimbursement (on production of a proper receipt) against Cash Account Code 0L4 1020 (Non Hospital Medical Treatment costs) under NMS or against Resource Account Code NHA 001 under RAB.

14 The provision of PSS for Service personnel is to be made under individual Service arrangements.