

Beards, stubble and Respiratory Protective Equipment (RPE)

Introduction

Recently there have been several high profile stories about beards being banned in the workplace as they interfere with facial masks.

Many Unite members, especially those working in the construction, transport, food and agriculture, manufacturing and print sectors, may come across hazardous substances in the workplace. Every year thousands of workers are made ill by exposure to dusts, paints, lubricants, glue and inks, contracting lung diseases such as asthma, silicosis and lung cancer.

RPE is often seen as a solution to this, but under health and safety law should actually be used as a last resort. Furthermore, HSE research in 2010 found that the correct use of RPE was poorly understood. It is essential that everyone involved has a thorough understanding of risk and how the equipment works.

This is why Unite has decided to issue this guidance on law which is there to protect you from being made ill from exposure to hazardous substances – and about RPE.

What is RPE?

RPE is a particular type of personal protective equipment (PPE) designed to protect the wearer from breathing in harmful substances or from oxygen-deficient atmospheres when other controls are either not possible or insufficient on their own.

Types of RPE

There are two main types of RPE.

These are respirators and breathing apparatus. These are divided into two main groups:

Tight fitting facepieces (often referred to as masks) rely on having a good seal to the wearer's face

Loose fitting facepieces rely on enough clean air being provided to the wearer to prevent contaminant leaking in. Examples are hoods, visors, blouses and suits.

RPE filters

Respirators use filters to remove contaminants from the air being breathed in. It is vital that the correct filters are used in the RPE.

Key Points

- Health and safety regulations like the COSHH, Control of Substances Hazardous to Health regs. require employers to prioritise prevention and control of exposure to hazardous substances over the use of RPE.
- The use of RPE is the last resort or last line of protection. Other steps to protect you must be considered and if possible implemented first.
- Where RPE is used it must be able to provide adequate protection for the individual wearer. Assumptions that there is a "standard" male face for respiratory protective equipment must be avoided as the effect will be that most women, as well as men from black and minority ethnic groups, or men with facial hair may struggle to find suitable RPE
- As workers' faces vary in size and shape, being given a choice of RPE is essential to ensure that it is comfortable for each individual to wear. It is unlikely that any one type of respirator will pass a face fit test on, or be acceptable to, every worker, and there are also different types of RPE. The HSE has published a Suitability Table which is included in this guidance.
- Followers of some religions are encouraged or required to keep a beard. A beard ban could potentially be indirect discrimination on grounds of religious belief under the Equality Act 2010.
- Some people may not be able to wear a respirator for medical reasons, for example people with a skin condition is exacerbated by effect of a tightly fitting mask.

Before considering a beard ban, employers must take action as follows:

- Step 1** Carry out a COSHH risk assessment which looks at all aspects of the work to find out who may be may be harmed and why
- Step 2** Find out if the risk can be removed or significantly reduced by preventing or controlling it
- Preventing exposure** includes limiting a particular task, planning out the task, using less toxic substances or changing the method of work.
- Control measures** include providing local exhaust ventilation, or screening off dusty areas to protect all those at work there.
- Step 3** Consult the workforce and Unite as the relevant union about all of this.



Now read on for more information.

Why is RPE the last resort or last line of protection?

- RPE is intrusive equipment.
- Not many people would willingly want to wear RPE for any length of time as it can be uncomfortable to wear.
- RPE can interfere with the wearer's personal freedom such as wanting to have a goatee, beard or to come to work with stubble.
- RPE can cause disturbance to make-up, jewellery and hair style.
- RPE may interfere with communication and vision
- When used in hot or humid conditions RPE can cause heat stress, sweating or discomfort
- RPE can give a sense of false protection, especially when not worn in accordance with the manufacturer's instruction.
- RPE can be expensive in the long run when compared to simple, common sense control measures.
- RPE can only protect the wearer.



Some RPE Rules

Must be adequate (capable of controlling the risk)

Must be suitable (matched to the task, the requirements of the individual wearer and the work environment)*.

Matching the requirements of the individual wearer should include giving you a choice of RPE.

Should be used only for a limited time –for face fitted RPE the HSE recommend 1 hour as the maximum use period after which you should **take a break**.

Should not be used in oxygen deficient atmospheres (confined spaces)

Should be appropriately stored, and maintained in good working order

You should receive training from your employer on wearing the respirator correctly

Your employer must provide RPE free of charge

* Please refer to the Respiratory Protective Equipment Suitability Factors table on pages 6 and 7.

Tight fitting masks need face fitting

If tight fitting respirators are used then the employer must carry out face fit tests using a competent person. This is someone who is appropriately trained, qualified and experienced and who has been given the right information to undertake the task.

For the facefit to work properly, there should be no facial hair such as stubble and beards. This is because hair makes it impossible to get a good seal of the mask to the face.

If you are clean-shaven when wearing tight-fitting masks (ie those which rely on a good seal to the face), this will help prevent leakage of contaminated air around the edges of the mask and into your lungs. You will therefore be breathing in clean air, which will help you stay healthy.

The face fit established by the face fit test should be maintained during daily use. The British Standard guidance is that an RPE wearer should shave within 8 hours from the start of their shift, but rate of growth will vary with the individual. Risk assessments should take account of work patterns and if you need to shave during the working day Unite advises that your employer should provide appropriate facilities and allow you paid time to shave.

Loose fitting RPE must be offered

There are practical problems to be overcome before face fitted RPE can work effectively to protect you. There are also potential discrimination issues and some workers may have health problems (such as skin conditions) which mean they cannot shave or shave frequently. This is why it is essential that workers should have a choice, and loose fitting RPE should be made available. It may be argued by some that this is more expensive but Unite's view is that its cost will easily outweigh the expense face-fitting programmes.

Consultation with workers on RPE

If an employer wants to introduce a policy on respiratory protective equipment, then under health and safety law they must consult in advance with their employees and listen to their views before taking a decision.

Imposing policies without consultation is not acceptable and could lead to workers being harmed.

Any RPE policy should make it clear that RPE will only be required to be worn if appropriate COSHH risk assessments have been carried out in consultation with employees, and have concluded that the risks to health cannot be adequately controlled or prevented in other ways.

The Control of Substances Hazardous to Health (COSHH) Regulations 2002 apply to all workplaces where hazardous substances are being used. Work should not start until a suitable COSHH risk assessment has been carried out and implemented.

What employers must do under COSHH

Assess the risks

Decide what precautions are needed

Prevent or adequately control exposure

Ensure the controls are used and maintained

Examine and test the control measures

Prepare plans and procedures to deal with accidents, incidents and emergencies

Consult Unite safety representatives/employees

Ensure that employees are properly informed, trained and supervised

In addition, where appropriate employers must:

Monitor the exposure of employees and non-employees who may be on the premises

Ensure that employees who require it are under health surveillance.

What employees must do under health and safety law

Take care of their own health and safety

Co-operate with their employer on health and safety and report health and safety concerns

Make full and proper use of control measures under COSHH

If RPE has to be provided, follow the training they have received in its use, storage and maintenance

Further information

There are many other aspects to COSHH and members are advised to consult this HSE leaflet: Working with substances hazardous to health - <http://www.hse.gov.uk/pubns/indg136.pdf>

HSE – Consulting employees www.hse.gov.uk/pubns/indg232.pdf

HSE Construction Dust – CiS sheet 36 www.hse.gov.uk/pubns/cis36.pdf

HSE FAQs on RPE <http://www.hse.gov.uk/respiratory-protective-equipment/index.htm>

HSE - HSG 53 Respiratory Protective Equipment at Work <http://www.hse.gov.uk/pubns/books/hsg53.htm>

British Occupational Hygiene Society – RPE – Facial Hair and Face Masks
<http://www.breathefreely.org.uk/assets/rpe-fact-sheet.pdf>

The British Safety Industry Federation (BSIF) has a fit tester accreditation scheme which may help to decide whether a fit tester is competent. <http://www.bsif.co.uk/campaigns-projects/fit2fit-2/>

Further assistance

If your employer is introducing RPE and is not following these procedures or if you have any other concerns, then contact your Unite safety rep/ shop stewards. If you do not have a safety rep or steward contact your Unite regional officer.

Respiratory Protective Equipment – Suitability Factors To Consider

Suitability factor	Why	Solution	
Work rate	Higher work rates may increase breathing and sweating, which can affect the performance of some types of RPE. Higher breathing rates can cause contaminants to leak in, and sweating can cause facepieces to slip and leak.	Light work rate	Sedentary work: assembly or sorting of light materials, arm and leg work, drilling. Most RPE would be suitable.
		Medium work rate	Sustained hand and arm work: sawing, planing or chiselling wood, plastering, filing, work with pneumatic breaker, intermittent handling or carrying moderately heavy material, shovelling, sledgehammer work, concrete block laying, pushing or pulling heavily laden hand-cart. Consider more comfortable RPE such as powered respirators or loose-fitting devices.
		Heavy work rate	Heavy manual work: shovelling or digging, climbing, ramps or ladders. Powered respirators or BA are recommended.
Wear time	Unpowered tight-fitting masks become uncomfortable to wear for long periods and wearers may be tempted to loosen or remove the RPE.	Wear time more than 1 hr	Using powered RPE with tight-fitting masks or loose-fitting facepieces will help minimise fatigue and discomfort.
Abnormal temperature or humidity	In hot and humid conditions, wearing RPE increases heat stress, sweating and discomfort.	Extreme heat	Using powered respirators or airline BA would help to minimise these problems. Proprietary cooling devices are available but consume a lot of compressed air.
	Airflow associated with powered respirators or airline BA can cause chilling effects.	Extreme cold	Proprietary heating devices are available but consume a lot of compressed air.
Facial hair and markings	Affects where a face mask seals to the face and will cause leakage.	1 Beard, stubble or any hair in the region where a face mask seals 2 Deep cuts or scars, wrinkles, moles, warts present in the face seal area	Consider the use of loose-fitting facepieces, which do not rely on a tight seal in this region.

Table reproduced from the HSE publication HSG 53 Respiratory Protective Equipment at Work (2013)

Suitability factor	Why	Solution
Spectacles	Spectacles with side arms are incompatible with full face masks as they break the face seal and they may also interfere with the fit of half masks.	RPE manufacturers can supply special frames, which fit inside their masks. It is the responsibility of the employer to find and provide an appropriate solution.
Vision	If you need to see fine details when wearing RPE, but don't need to protect the eyes from the airborne hazard, RPE types which include face protection (full face masks, visors, hoods) may not be ideal because they can be prone to scratching, misting and surface contamination.	Consider half mask RPE, provide adequate lighting, or choose designs that resist scratching and internal misting. Powered respirators or airline BA are more resistant to misting. Some types include 'tear-off' consumable visors.
Communication	All RPE affects your ability to communicate.	If your work requires clear and precise communication you should use RPE incorporating proprietary communication devices (ranging from simple speech diaphragms to complex radio intercom systems), or other suitable forms of communication.
Flammable or explosive atmospheres	RPE can be a source of ignition.	If you cannot avoid working in potentially flammable or explosive atmospheres, including oxygen-enriched atmospheres (levels above 21%), you may need to use intrinsically safe, light alloy-free and antistatic RPE.
Use of air power tools	Air jets from power tools (pneumatic or electric) can make RPE valves leak.	Shield tools or seek alternative design. Use RPE designs with valves remote from tool exhaust location.
	Connecting air-powered tools and your RPE to the same air supply will affect RPE performance.	Ensure that your compressor can supply enough air for both at the same time.
Contact lenses	Wearers may suffer discomfort or, if the lenses are dislodged, the wearer may remove the RPE to replace them while still in the hazardous area.*	Use spectacles (in mask if necessary) instead.
Mobility	Snagging and damage to trailing hoses. Added bulk of fan units/air cylinders in tight spaces.	Ensure adequate inspection regime and consider other RPE types.

* The lenses can also jam in the RPE valves, leading to loss of protection.