

Appendix 3: Inspection Aide Memoir

Table 1 provides an aide memoire for RPE inspection to assist in gathering the information necessary to assess performance against the risk control indicators in Appendix 2. It also provides guidance on the level of initial enforcement expectation in accordance with the EMM. Clearly relevant dutyholder and strategic factors will still need to be applied.

The table assumes that risk of serious personal injury has already been considered and dealt with where appropriate.

The benchmark level of risk is usually nil/negligible for health. The risk gap is determined by the consequence and likelihood of the actual risk against the consequence and likelihood of the benchmark level of risk.

Standards are usually established within the industry sector and/or approved codes of practice and guidance.

Definitions used in Table 1:

Health Consequence

The Consequence Table of the Enforcement Management Model states the following:

1. Serious personal injury/ serious health effect: 'It is credible that a fatal or major injury, as defined by RIDDOR Regulation 2 could occur. It is credible that a health effect caused by certain diseases, a health effect that causes a permanent, progressive or irreversible condition, or causes permanent disabling leading to a lifelong restriction of work capability or a major reduction in quality of life, could occur.'
2. Significant injury/ significant health effect: 'It is credible that injury types not captured by the category of serious personal injury, but which would be reportable under RIDDOR if it happened to a person at work, could occur. Also health effects that are caused by certain diseases, non-permanent or reversible health effects, non-progressive conditions, or those that result in temporary disability.'
3. Minor injury/ minor health effect: 'Injuries or conditions not included above, for examples, temporary symptoms like irritation, nausea, headache, etc.'

Likelihood

4. Probable - repeated and prolonged exposure to highly potent substance or a gross exposure from a large spill or major incident

5. Possible – repeated and prolonged exposure or continuous or frequently repeated exposure.

6. Remote – single or very occasional exposures above WEL.

Appendix 3: Inspection Aide Memoire:

Table 1 Assessment of adequacy and suitability of RPE

RPE Programme Key Elements	Benchmark level required to ensure likelihood of risk is nil/negligible	Potential Issues Identified during inspection	Actual Risk to Health		Risk Gap (non compliance with the benchmark standards will produce):	Initial Enforcement Expectation when <i>established</i> standards are known:	Consider Prosecution
			Health Consequence	Likelihood:			
RPE selection adequate for the hazardous substance present and the concentration generated by the tasks	(i) Optimum/adequate assigned protection factor (APF) (ii) Correct filter type selected: Dusts and fumes or Gases and vapours or Combination filter	(i) Inadequate assigned protection factor (APF) (ii) Incorrect filter selection for filtering respirators (iii) incorrect respirator type selected eg filtering respirator when constant flow airline BA required	Serious	Probable	Extreme	Improvement Notice	Yes
				Possible	Extreme	Improvement Notice	Yes
				Remote	Substantial	Improvement Notice	No
			Significant	Probable	Substantial	Improvement Notice	No
				Possible	Moderate	Letter/inspection form	No
				Remote	Moderate	Letter/inspection form	No
			Minor	Probable	Moderate	Letter/inspection form	No
				Possible	Nominal	verbal warning	No
				Remote	Nominal	verbal warning	No
RPE Programme Key Elements	Benchmark level required to ensure likelihood of risk is nil/negligible	Potential Issues Identified during inspection	Actual Risk to Health		Risk Gap (non compliance with the benchmark standards will produce):	Initial Enforcement Expectation when <i>established</i> standards are known:	Consider Prosecution
Health Consequence	Likelihood:						
RPE suitable for the work, task, environment and the	(i) Work task: Work rate normal Vision unhindered	(i) Unsuitable equipment due to: Heavy work rate	Serious	Probable	Extreme	Improvement Notice	Yes

wearer	(ii) Environment: Temperature normal (not elevated) Communication not an issue Confinement not an issue Access/ Mobility not an issue Other PPE is compatible (iii) Wearer fit tested and clean shaven (no beard/stubble)	Restricted vision (ii) Hot/elevated temps Communication essential/required but impaired RPE impedes access/mobility Incompatible with other PPE (iii) No fit test No record of fit test Fit test failure Beard/stubble		Possible	Extreme	Improvement Notice	Yes
				Remote	Substantial	Improvement Notice	No
			Significant	Probable	Substantial	Improvement Notice	No
				Possible	Moderate	Letter/inspection form	No
				Remote	Moderate	Letter/inspection form	No
			Minor	Probable	Moderate	Letter/inspection form	No
				Possible	Nominal	verbal warning	No
				Remote	Nominal	verbal warning	No

Table 2 Compliance with RPE programme and Administrative Arrangements for a RPE Programme

RPE Programme Key Elements	Benchmark level required to ensure likelihood of risk is nil/negligible	Potential issues identified during inspection	Descriptor	Initial Enforcement Expectation when established standards are known

Information, Instruction and Training	<p>RPE wearers fully trained on: Roles and responsibilities Hazards and why devices selected How RPE works Pre and post use checks, donning and fit checking Correct Use and wearing of RPE Maintenance procedures including cleaning and fault/problem reporting</p>	<p>No record of training Evidence of poor work practices</p>	Absent	Improvement notice
			Inadequate	Letter
			Minor	Verbal warning
Maintenance and checks	<p>(i) Pre-use checks carried out by wearer Post-use checks Cleaning and decontamination</p> <p>(ii) Thorough examination and test of non-disposable RPE and records kept</p> <p>(iii) If applicable: SCBA supply air pressure checked and recorded.</p> <p>Breathing air quality checked and recorded for air-fed breathing apparatus.</p>	<p>Not carried out No records</p>	Absent	Improvement notice
			Inadequate	Letter
			Minor	Verbal warning

Storage facilities and arrangements	Clean environment Protected box/bag In accordance with manufacturer's instructions	No storage facilities/arrangements Dirty/inappropriate facilities where RPE could become contaminated or moisture could effect the filter performance	Absent	Improvement notice
			Inadequate	Letter
			Minor	Verbal warning

Please note: Dutyholder and strategic factors may alter the Initial Enforcement Expectations