

# Personal protective equipment and women

*Guidance for workplace representatives on ensuring it is a safe fit.*

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## Section one

# The law on personal protective equipment

There are a number of regulations covering personal protective equipment (PPE). The Personal Protective Equipment Regulations 2002 and the Personal Protective Equipment at Work Regulations 1992 (as amended) give the main requirements. These place a legal requirement on employers to provide PPE to workers free of charge, and to maintain it, if it is needed to protect them from any hazards to their safety or health. Other special regulations cover hazardous substances (including lead and asbestos), and also noise and radiation.

Equality law also requires employers to treat women no less favourably than men. PPE cannot be used as the main “first-line” protection against hazards. Instead employers must try to remove or reduce any risk through other means, such as substituting dangerous chemicals for less dangerous ones, or installing barriers or ventilation, but PPE is common in many workplaces.

Most people think of PPE as being hard hats, boots or gloves, but it can include a wide range of clothes or equipment. The Personal Protective Equipment at Work Regulations defines PPE as: ‘All equipment (including clothing affording protection against the weather) which is intended to be worn or held by a person at work which protects them against one or more risks to their health and safety’. This means that it includes overalls, eye and ear protection, fleeces, knee pads, high-visibility clothing,

*Although self-employed people are responsible for their own PPE, if someone is self-employed for tax reasons, but who otherwise work in an employee-employer relationship, it is the responsibility of the employer to provide suitable PPE.*

safety harnesses, anti-stab jackets and respiratory protective equipment (RPE).

Whether PPE is needed must be identified through Risk Assessment. For example, a Control of Substances Hazardous to Health (COSHH) risk assessment may show that eye protection is required when using the chemical being assessed.

Employees must be provided with adequate information, instruction and/or training on the use of PPE. Employers also have to make sure that the PPE is suitable for the purpose, and provided to all staff at no cost to them. The employer also has to ensure that it is maintained and, that there is adequate storage if it has to be kept in the workplace. This is not always happening. A TUC survey showed that only 85% of women were always provided with PPE by their employer, and even when they did provide PPE, 10% of employers did not replace it and less than half paid the cost of cleaning when it was needed.

## Section two

# Problems with PPE for women

Although PPE has to be suitable for the person who is using it, that is often not the case. A 2016 survey conducted by a number of organisations, including the trade union Prospect and the TUC showed that 57% of those women who took part found that their PPE sometimes or significantly hampered their work.

This is not surprising as most PPE is based on the sizes and characteristics of male populations from certain countries in Europe and the United States. As a result, most women, and also many men, experience problems finding suitable and comfortable PPE because they do not conform to this standard male worker model. For instance, the use of a 'standard' US male face shape in the manufacture of RPE means that it does not fit most women as well as a lot of men from black and minority ethnic groups or with facial hair. The same applies to most other types of PPE including hard hats, overalls, eye protectors, gloves and boots.

Often employers think that all they need to do for women is get the same PPE for men, but smaller. This unisex approach to PPE can lead to significant problems. Items such as fall-arrest harnesses need to fit well but differences in chest hips and thighs can affect the way that the straps fit. Another example is safety boots as a typical women's foot is both shorter and narrower than a typical man's foot, so a smaller boot

### ■ PURPLE BOOTS CAMPAIGN

*The Women's Engineering Society (WES) explored the issue of poor fitting and unsuitable PPE in construction by conducting a large-scale safety clothing and footwear survey. The survey results showed a lack of availability of PPE designed for women, it was usually smaller sizes of menswear. WES partnered with a manufacturer to develop and retail a new pair of boots. Through its campaign, WES was able to raise the awareness of women and so obtain PPE that was suitable for their size and shape.*

may be the right length but not the right width.

The 2016 survey found that just 29% of women who responded said that the PPE they use is specifically designed for women. This meant that many people found that it was not suitable for the purpose. This was particularly the case with trousers, where 41% of women said that what was provided was not suitable as against 10% who found it good. In the case of overalls, 35% found

them unsuitable with only 10% rating them good.

Women also find that it is very difficult to get suitable PPE during pregnancy. Many employers are reluctant to buy appropriate PPE at each stage of the pregnancy even if it is available (and often it is not). The 2016 survey showed that very few women had worn maternity PPE and of those that had been pregnant, half had curtailed their normal range of duties or had to change their role in the run up to maternity leave. Problems with PPE used to protect against chemicals can be even more critical during pregnancy as current occupational exposure limits are set based on studies of non-pregnant adults, and so the maximum legal levels may be more harmful for pregnant women or unborn babies.

Inappropriate PPE can impact on a person's work and their safety. 57% of women stated that their PPE sometimes or significantly hampered their work. The problem was worst in the emergency services, where only 5% of women said that their PPE never hampered their work.

In fact ill-fitting, uncomfortable or inappropriate PPE not only prevents women doing their job, it can be a significant health and safety issue. PPE is after all meant to provide protection, so if it is unsuitable then it is not doing the job properly.

***“57% of women stated that their PPE sometimes or significantly hampered their work.”***

The wrong PPE can increase risk from injury. For instance ill-fitting gloves can lead to problems gripping, while the wrong shoes or overalls can increase the chances of tripping. Inappropriate shoes can also lead to callouses, bunions, foot deformities and

back pain, over and above the risk of crushing your foot. Women also often report that safety harnesses, belts and body armour can cause significant problems due to rubbing against the skin or not being designed to accommodate different sized breasts or hips.

If PPE does not fit, is uncomfortable, or causes health problems, then women often will not use it. The consequences of not wearing proper head wear or foot wear can be catastrophic, and even failing to use gloves, overalls or jackets can lead to injury.

For too long many occupations and industries have had big issues around job segregation. In sectors like construction and engineering only very recently have women begun to be more visible. Unless women in these sectors have the same access to safe and comfortable PPE they will continue to find it much harder to work on an equal footing to men. For that reason PPE should be seen as an important equality issue.

***“Women also find that it is very difficult to get suitable PPE during pregnancy.”***

*All PPE should have a CE mark. The CE mark signifies that the PPE satisfies certain basic minimum safety requirements, including meeting the European standards for that equipment. Unfortunately there is a lot of fake PPE out there that is often produced outside Europe that does not meet these minimum standards but still has a CE mark. See [TUC advice](#) on checking whether your PPE is legal.*

## ▣ NOT JUST PPE

*Work equipment (such as desks, chairs, machinery and personal protective equipment (PPE) still tends to be designed for the average-sized male worker and takes less account of the ergonomic needs of women. Because of this, the use of work equipment designed for men can increase women's work injury rates. If work equipment is not the correct design, or is set up wrongly this can lead to poor working posture, leading to an increased risk of musculoskeletal disorders. Hand tools and workstation heights are often uncomfortable for workers who are smaller or taller and larger than the 'standard' worker. For instance, the average woman has a hand length about 2cm shorter than a man's, so tools such as pliers can have too thick a grip, inappropriate placement and loss of functionality.*

## Section three

# Some examples

These comments were among those sent to the TUC after it asked women about the problems they had experienced with PPE.

### **NHS Estates Department**

“Luckily my shoe size is easily available, but I would struggle if I had smaller feet to find suitable safety boots. If shoe manufacturers can sell shoes in smaller (and larger) sizes, there is no reason that safety boot manufacturers cannot do the same.

My main problem was with the T-shirts that were deemed suitable for women. For some reason, unlike the male version, they are fitted and not as robust. I found them to be unsuitable to wear as it was not possible to move freely and I have reverted to the men’s fit. It seems as if women are seen as wanting something fashionable, rather than practical, which, in itself, is a form of sexism.

I have been to many women’s career sessions and have yet to find any woman involved who did not have properly-fitting PPE, but it would be a great help if manufacturers could address the problem of safety boot sizes for everybody’s sake, not just

women. Men come in different sizes, as well.

We don’t need to be Barbified, just have the same gear as the men, but with an adjustment to allow a proper fit (e.g. boiler suits with a little more room for hips) for women.”

### **Rail industry**

These are some of the comments from women in the industry that were received:

“The shape of clothes are all designed with the man in mind. I’m 5ft2 and small framed (size 6). Any uniform I get just hangs on me. As for boots. I’m a size 3. Again they seem to come up huge.”

“Zips are always backwards on hi-vis cotton trousers (men’s and women’s trousers normally have zips doing up opposite ways) and most items of PPE come in large, xl, xxl and xxxl. You can wait months just doing with a large or xlarge until a smaller size is eventually ordered and arrives. I eventually managed to get my manager to get me small gloves in a size 7 not the regular size 13 which were huge but it took

nearly 2 years for them to accept it had to be done.”

“Trousers are too fitted they are not ideal for sitting for long periods we have jobs where we sit for 4 hours in the seat with just a 5 min break. They dig in round the waist.”

“Had many issues trying to get gloves that fit on freight. The size 13 rigger gloves initially given to me were dangerous for climbing on/off locos and thrown back at management. Hard hats are too big so I bought my own. Size Small is a) a rarity, b) mens small only. Women's boots are getting better but general hi-viz is still a massive challenge, orange trousers for example. Always have to wait longer for stuff to arrive as well.”

“Apparently they don't 'do' small hi-vis vests for my new employer, tried the medium and I can fit two of me in! Having to wear long sleeve jackets in all weathers now.”

## **Police support staff**

“I am presently trying to address gender sensitive PPE boots for female CSI's. The PPE boots supplied are same as those for males, and the females find them uncomfortable, too heavy, and causing pressure on the Achilles tendons. Our uniform stores refused to address the matter, similarly the H&S team, however I have now taken the matter to the H&S Committee, who have said they will look into it on individual basis as required. I have pointed out that if PPE is required it must be suitable and sufficient, and if staff purchase their own, they could be nullifying the PPE.”

## **Coastguard service**

“We are all issued with full PPE including a set of overalls. The idea being that because we all have other jobs and responsibilities we can be paged or called at any time to respond to a search and rescue incident and we must put these overalls on top of whatever clothing we may be wearing at the time. The overalls are a one piece design with a zip which fastens at the front.

A complaint which many of my female colleagues have regularly made about the overalls is that they make it very inconvenient for female coastguards to use the toilet while wearing them. There is a double zip at the front which is great for males, but for female coastguards it is very impractical to go to the bathroom.

It isn't just a matter of having to take off the overalls to use the bathroom. The overalls form a base layer over which several other pieces of PPE are often worn, such as foul weather clothing, life jackets, climbing harnesses etc. and it is a major operation to have to strip these all off in order to remove the overalls. As the type of incidents which we are called to regularly involve long searches which can last for many hours you can imagine the discomfort which female coastguards end up having to experience as a result.

It has been suggested to management that the current overalls should be replaced with a two piece garment which would allow the trousers to be pulled down without having to remove the top section, and while management have acknowledged the advantage of



this idea nothing has so far been done to implement it.”

## Local government environmental services

View of a procurement officer:

“One women staff member is quite petite, and we have had PPE/Uniform problems with most of the suppliers that have won contracts over the years.

The male/female employee numbers simply dictate where the manufacturers do most research and development. It has meant less choice for female staff, and in some occasions also a lesser quality product versus the cost of the same equivalent “male” product.

If the supplier has considerable background in a mix of corporate wear and uniform, then they will likely be able to better cater for male and female “manual” staff. We have used a company for our uniform that has mainly experience in corporate wear, and they were able to source suitable female options, but it was still something of an add-on, rather than the norm.

However, a major supplier of PPE etc that I use (and who would supply PPE/Uniform to a large amount of industrial companies) has a poor selection of female PPE and “manual” uniform. They also really only supply female safety footwear in quite basic form, or alternatively in the higher end types that would be worn by Health Officers and Building Control staff. They stock very few types of female safety footwear that would be considered a direct equivalent of the Class S3 safety boot that is worn as

standard in our organisation. The same can be said for protective gloves – there are certain brands in size 7, but most sizes run from size 8 to 11 (as they would be the most common male sizes).”

## Police body armour

Body armour issued to women police officers is a major concern. This is despite regular complaints being made over the past 20 years. In 1997 a women police officer was stabbed and killed while using a hydraulic ram to enter a flat. She had removed her body armour because it was too difficult to use the ram while wearing it. Two years later a woman police officer disclosed she had to have breast reduction surgery because of the health effects of wearing her body armour. After the case was reported another 700 officers in the same force came forward to complain about the vest. Over 20 years after complaints were first made, women officers are still reporting problems. This is a selection of complaints received:

“For a long time our uniform has never fitted correctly as we appear to have hips and breasts. Who would’ve thought? My vest is doubled as a hand warmer during the cold months as the breast area padding is so roomy. The actual vest sits on my kit belt which in turn bruises my hips, especially when standing for long periods of time on an operation. I cannot be alone in this.”

“I have had similar issues with my stab vest. I have been having regular sports massages due to problems with my back and IT band in my leg. I am told by my physio that my stab vest and kit belt is the main culprits due to the way pull on the shoulders and the vest pushes down the belt. My stab vest

also sits on my belt causing the belt to rub uncomfortably making my hips sore and often bruised after a long shift.”

“I’ve actually had physio due to the issues with my stab vest sadly. I took my stab vest in to show them and they were horrified and felt they are terrible for posture. I get sore hips where the belt and equipment rub, leaving red marks. I don’t have the joy of the vest being roomy, in fact, mine makes me feel incredibly squashed in the chest area even though it is shaped. They seem to be one size fits all in the chest which clearly isn’t the case!”

“My stab vest usually chokes me when sitting in the Police vehicle. It rides up to my chin. Yes the stab vest only acts as sweat box in the summer and a heater in the winter. As far as being something to protect me against a knife, there are plenty of areas accessible to anyone who wanted to do serious harm. It sits on my chest, meaning I can fit my hand up through the bottom of the vest. I find that, as a result, it doesn’t distribute the weight evenly, giving me back pain if I have to stand for long periods of time. It also comes up far too short. All I can truly say is that, I have suffered aches on my torso and back area from stab vests and more than likely due to the fact that I am not flat chested and also have had children and therefore my body has been probably affected by child bearing. I certainly agree that when we wear such heavy and needed PPE that it should be properly fitted and suitable to individuals if not at least suitable for the female body shape.”

“My vest is all loose above the breast area and towards the shoulder, so loose it sometimes bows out! The vest also has large areas uncovered

underneath my arms as it sits quite low and butts up against my tack belt and equipment. It also infuriates me that the epaulettes made for stab vests are so big. Mine have to be folded under on the button side which is very uncomfortable. If this is not done I have two large ‘handles’ by which to grab my vest and therefore...me!”

“I would describe my stab vest as similar to a crop top. It is not designed to fit my breasts and despite numerous attempts to adjust it to fit it still doesn’t. There is no side protection at all and the gap left at the top above my breasts is large enough to fit another pair of breasts. When I sit in the car or on a chair the stab vest rises up and I end up looking like I’m wearing a tortoise shell. This leaves both my hips and neck sore. Wearing it for a full shift causes me to feel sharp pains in my back for hours after I take it off and my breasts feel sore from being squashed for anything up to 12 hours. The only good point about it is that it keeps my hands warm in the winter.”

*“We don’t need to be Barbified, just have the same gear as the men, but with an adjustment to allow a proper fit...”*

## Section four

# Taking action

Here are a number of suggestions about what unions representatives should ask of employers, and also some ideas about what representatives can do.

### What employers can do

- ✓ Employers should avoid suppliers who do not provide a range of sizes for both men and women and must seek to ensure that their suppliers have properly assessed the appropriateness of their equipment to both men and women.
- ✓ If there are issues over the suitability of PPE for women they should work with trade bodies to put pressure on manufacturers and suppliers to provide a full range of PPE.
- ✓ Where a need for separate PPE for men and women is identified employers should make sure that they provide the same range of sizes for women as for men.
- ✓ They should ensure that women try on several sizes or types of PPE before it is issued to ensure that it is best fit. This should be regardless whether PPE is considered unisex or gender-specific.
- ✓ Employers should provide mechanisms to ensure feedback on the suitability of PPE either to safety committees, or occupational health providers. This is

best done through both reporting mechanisms and anonymous surveys.

- ✓ They should work with safety committees and health and safety representatives to ensure that the correct range of suitable PPE is provided.

### The role of a workplace representative

- ✓ Union health and safety representatives should raise the issue of gender and PPE with their employer through the joint safety committee and ask for a report on whether appropriate PPE is provided and worn.
- ✓ Survey women members to see if they have any issues with the PPE that is provided or if there are any areas where it is not provided.
- ✓ Encourage members to report any issues around PPE both to their line manager and to the union.
- ✓ Don't just accept it if your employer says that there is no suitable PPE available for women. Work with other representatives in other workplaces in the industry to share experiences of problems and solutions.
- ✓ Report any successes to your union.

## Find out more

For more information about health and safety issues, go to:

**[tuc.org.uk/ workplace-issues/health-and-safety](http://tuc.org.uk/workplace-issues/health-and-safety)**

Follow TUC health and safety on Facebook at:

**[facebook.com/TUChealthandsafety](https://facebook.com/TUChealthandsafety)**

Subscribe to the TUC Risks newsletter here:

**<https://www.tuc.org.uk/mediacentre/register>**

## Some useful websites

HSE PPE pages

**<http://www.hse.gov.uk/toolbox/ppe.htm>**

TUC PPE pages

**<https://www.tuc.org.uk/workplace-issues/health-and-safety/personal-protective-equipment-ppe>**

TUC guidance on footwear

**<http://www.tuc.org.uk/sites/default/files/footwear.pdf>**

Advice on PPE from Healthy working Lives

**<http://www.healthyworkinglives.com/advice/work-equipment/ppe>**

Excellent Canadian report on PPE for women

**[http://www.iapa.ca/pdf/2006\\_ppe\\_women.pdf](http://www.iapa.ca/pdf/2006_ppe_women.pdf)**