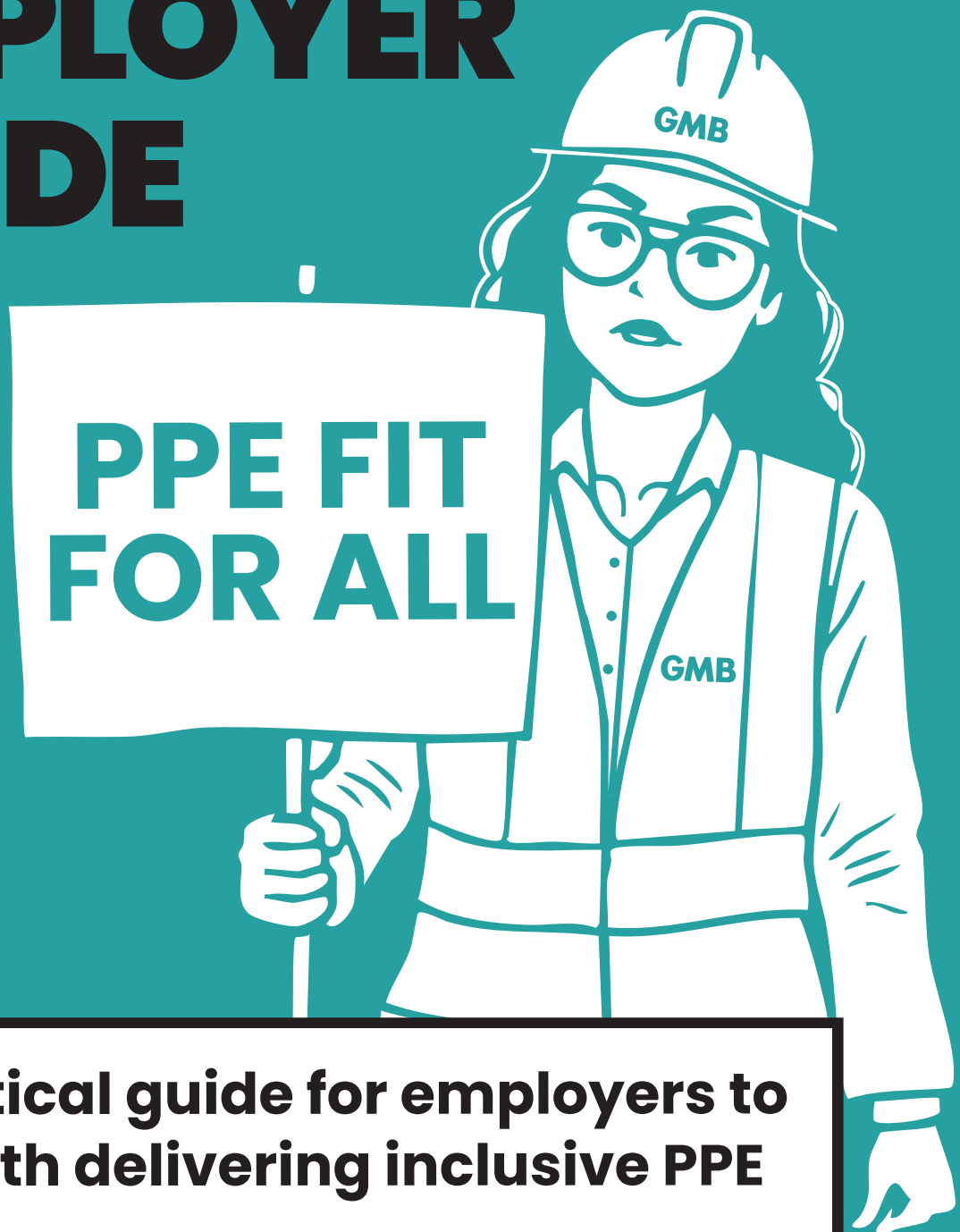


INCLUSIVE PPE CHARTER: EMPLOYER GUIDE



**A practical guide for employers to
help with delivering inclusive PPE**

GMB

UNION

gmb.org.uk

INTRODUCTION

GMB's Inclusive PPE Charter aims to resolve a structural design failure affecting workers' safety: **ill-fitting PPE does not adequately protect the user.**

Evidence gathered demonstrates that workers across a range of sectors are being provided with personal protective equipment that is unsuitable for their body shape, size, physical characteristics, gender, disability-related needs, pregnancy, faith requirements, or working conditions.

Poorly fitting PPE can reduce protection, restrict movement, lead to injury, undermine dignity at work and expose employers to legal and operational risk.

This guide is designed to help employers understand the issue, meet their legal responsibilities and implement practical solutions that ensure all workers have access to PPE that is fit for purpose.



WHY PPE FIT MATTERS

For many years, PPE selection and procurement have often been based on a limited range of body sizes and shapes, frequently reflecting a traditional male workforce. As workplaces become more diverse, this approach creates significant gaps in protection.

Examples of poor-fitting PPE include:

- Gloves that are too large, reducing dexterity and increasing entanglement risks.
- Safety footwear that does not fit different foot shapes and widths.
- Respirators that fail face-fit testing and do not provide an adequate seal.
- Harnesses that sit incorrectly on the body and compromise fall protection.
- Workwear that restricts movement, creates trip hazards or causes discomfort.
- PPE that does not accommodate pregnancy, disability requirements or religious clothing.

Ill-fitting PPE is not simply an inconvenience. It can increase exposure to hazards, reduce worker confidence, affect productivity and contribute to worker injuries.



THE BUSINESS CASE FOR ACTION

Organisations that provide inclusive PPE benefit from:

- **Improved Safety** – Workers are more likely to wear PPE correctly and consistently when it fits properly, improving protection and reducing risk.
- **Reduced Legal and Compliance Risk** – Failure to provide suitable PPE may create health and safety, employment and equality risks. Employers must ensure PPE is suitable for the individual user and the task being undertaken.
- **Enhanced Productivity** – Workers who can move comfortably and safely are able to undertake tasks more effectively and efficiently.
- **Greater Equality and Inclusion** – Providing PPE that accommodates diverse workers demonstrates a commitment to equality, dignity and fair treatment.
- **Better Recruitment and Retention** – Inclusive workplaces are more attractive to current and future employees, particularly in sectors seeking to increase workforce diversity.

Multiple organisations and public bodies are beginning to adopt an inclusive approach to PPE, employers should act now to be ahead of the curve.



BEST PRACTICE EXAMPLES

BAE System(s) have introduced an in-house, made to measure, PPE tailoring service by partnering with their PPE Supplier. Worker's measurements are taken to ensure the PPE they receive fits them correctly.

EDF at Hinkley Point C have signed GMB's inclusive PPE charter, and have done amazing work to ensure all workers on site, whichever contract they are on, can access fit-to-form PPE.

JCB have reviewed their procurement practices to ensure unisex design is eliminated from their stock. They now have both male and female options for key PPE items.



LEGAL RESPONSIBILITIES

Employers already have duties under health and safety legislation to provide suitable PPE where risks cannot be adequately controlled by other means. The suitability of PPE includes consideration of the individual wearer. PPE that does not fit correctly may not meet this requirement.

KEY LEGISLATION

Personal Protective Equipment at Work Regulations 1992 Regulation 4(1)

"Every employer shall ensure that suitable personal protective equipment is provided to employees who may be exposed to a risk to their health or safety while at work except where and to the extent that such risk has been adequately controlled by other means which are equally or more effective."

Regulation 4(3) – Suitability of PPE

PPE shall not be regarded as suitable unless:

Regulation 4(3)(a)

It is appropriate for the risk or risks involved and the conditions at the place where exposure to the risk may occur.

Regulation 4(3)(b)

It takes account of ergonomic requirements and the state of health of the person who may wear it.

Regulation 4(3)(c)

It is capable of fitting the wearer correctly, if necessary after adjustments within the range for which it is designed.

Regulation 4(3)(d)

Where multiple items of PPE are required, they must be compatible and continue to be effective when used together.

These provisions are the key statutory basis for the requirement that PPE must fit the individual wearer properly.

KEY LEGISLATION

Personal Protective Equipment at Work (Amendment) Regulations 2022

The 2022 Amendment Regulations came into force on 6 April 2022 and extended PPE duties beyond employees to include many workers classed as "limb (b) workers" under employment legislation. The amendment preserved the existing requirement for PPE to be suitable and correctly fitted to the individual.

Employers must:

- Provide suitable PPE free of charge;
- Maintain and replace PPE as necessary;
- Provide information, instruction and training;
- Undertake a suitability assessment for affected workers

ADDITIONAL LEGISLATION

Equality Act 2010

Section 19 – Indirect Discrimination A policy, practice, or provision of PPE that places women, disabled workers, or individuals with protected characteristics at a particular disadvantage may constitute indirect discrimination unless objectively justified.

Section 20 – Duty to Make Reasonable Adjustments Where a worker has a disability, employers may be required to make reasonable adjustments, including providing alternative PPE that accommodates that individual's needs.

Management of Health and Safety at Work Regulations 1999

Regulation 3 – Risk Assessment Employers must make a suitable and sufficient assessment of risks to workers and others affected by their undertaking. PPE should only be considered after the completion of a risk assessment and where risks cannot be adequately controlled by other means.

Regulation 4 – Principles of Prevention Employers must apply the hierarchy of control and give priority to collective protective measures before relying on personal protective equipment. PPE is therefore regarded as the last line of defence.

HSE Guidance

The Health and Safety Executive states that employers must assess PPE suitability and ensure PPE is appropriate for the individual user. PPE that does not fit properly may fail to provide the level of protection required and may therefore be regarded as unsuitable under Regulation 4 of the PPE Regulations.

Employers should also consider:

- Equality and discrimination risks.
- Reasonable adjustments for disabled workers.
- Pregnancy-related health and safety requirements.
- Public Sector Equality Duty obligations where applicable.



THE COST OF ILL-FITTING PPE :

TRUE SORIES FROM MEMBERS'



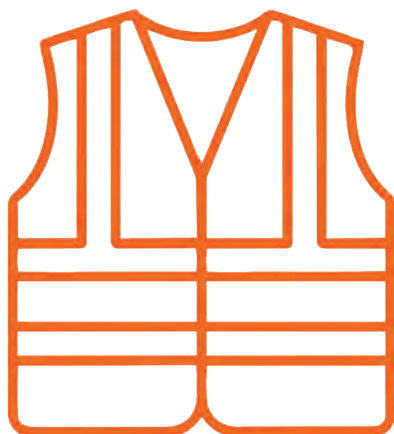
If a worker is not supplied with properly fitting safety equipment, they can legally refuse to undertake the task.

// Rowshi, an engineer, had to sit in the office for six weeks until her kit came in and she could get on site."



Employers and contractors may be liable for court proceedings for failing their duty of care, or for personal injury compensation.

// Sean, a General Operative, was injured after he was issued with ill-fitting gloves. After taking out a claim against his employer, he received an undisclosed payout at the high court."



There is a risk of serious harm or even death.

// During the pandemic, 100s of workers lost their lives due to ill-fitting PPE. Nigel, a paramedic, lost 7 of his colleagues and continues to suffer with chronic respiratory issues."



INCLUSIVE PPE PRINCIPLES

Employers should adopt the five core principles in GMB's Inclusive PPE Charter:



1. PROTECTION

PPE must be selected based on the hazards and level of protection required.

Questions to ask:

YES NO

- Does the PPE adequately control identified risks? ☐ ☐
- Are PPE failures monitored and investigated? ☐ ☐
- Are workers involved in evaluating performance? ☐ ☐

2. PROVISION

Employers should ensure a sufficient range of sizes, fits and designs are available.

Questions to ask:

YES NO

- Are multiple sizing options available? ☐ ☐
- Are gender-specific or alternative designs offered where appropriate? ☐ ☐
- Is replacement PPE readily available? ☐ ☐



3 . PROPER FIT

Every worker should have PPE that fits their individual characteristics.

Questions to ask:

YES NO

- Are fit checks undertaken? ☐ ☐
- Are face-fit tests conducted where required? ☐ ☐
- Can workers trial equipment before full rollout? ☐ ☐

4 . PEOPLE

Workers must feel able to raise concerns without embarrassment or fear.

Questions to ask:

YES NO

- Is there a simple reporting process? ☐ ☐
- Are PPE concerns escalated and resolved promptly? ☐ ☐
- Do managers understand their responsibilities? ☐ ☐

5 . PARTNERSHIP

Workers and trade unions should be involved throughout the PPE lifecycle.

Questions to ask:

YES NO

- Are workers consulted during procurement? ☐ ☐
- Are diverse workforce groups represented during trials? ☐ ☐
- Are PPE reviews undertaken jointly with worker representatives? ☐ ☐

You can find an inclusive PPE review checklist at the end of this guide.

PROCUREMENT BEST PRACTICE

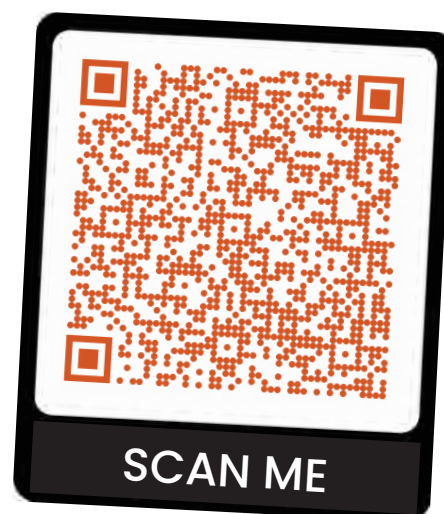
Procurement is one of the most important levers for improving PPE provision.

Employers should:

- Move away from "one size fits all" specifications.
- Involve end users when trialing and evaluating products.
- Require suppliers to provide broad size ranges.
- Request evidence of inclusive design.
- Consider different body shapes and proportions.
- Provide footwear in multiple width options.
- Include PPE fit requirements within tender documentation.
- Monitor supplier performance on PPE fit and availability.

Organisations should strive to align their procurement processes with BS 30417:2025 – Provision of Inclusive PPE, the first British Standard dedicated to inclusive PPE provision. The standard covers selection, procurement, fitting, accessibility, training, maintenance and worker consultation.

**You can find
a copy here:**



TRAINING AND AWARENESS

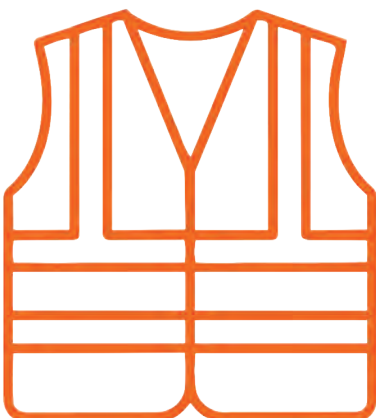
Managers, supervisors and procurement teams should receive training covering:

- The importance of PPE fit.
- Organisational responsibilities.
- Inclusive procurement practices.
- Reporting procedures.
- Worker consultation requirements.
- Use of BS 30417 guidance.



Workers should understand:

- Their right to suitable PPE.
- How to report concerns.
- How to obtain replacement or alternative equipment.
- Correct fitting, use and maintenance procedures.



WHAT GOOD LOOKS LIKE

Leading organisations will:

- ✓ Recognise PPE fit as both a safety and equality issue.
- ✓ Involve workers and unions in procurement decisions.
- ✓ Maintain a broad, inclusive range of PPE options.
- ✓ Collect and act upon PPE-related data.
- ✓ Align procurement processes with BS 30417.
- ✓ Regularly review PPE suitability and performance.
- ✓ Sign and actively implement the GMB Inclusive PPE Charter.



EMPLOYER COMMITMENT



GMB UNION

Inclusive PPE Charter

We believe every worker has the right to PPE that fits properly, protects effectively, and supports dignity at work. Poorly fitting PPE puts people at risk and can exclude staff from working safely.

- 1 PROTECTION**
We will ensure PPE selection is based on fit, risk and performance – convenience or cost-cutting will not be allowed to undermine safety. We maintain a reporting system to action, track and prevent issues.
- 2 PROVISION**
We will procure PPE in a full range of shapes and sizes, actively working to achieve BS 30417. We will ensure PPE is stocked for women and diverse bodies and replaced when worn, damaged or ineffective.
- 3 PROPER FIT**
We will provide fit testing and carry out regular checks to ensure PPE remains safe and effective. We will give workers the time, training and support needed to wear PPE correctly and confidently.
- 4 PEOPLE**
We will make it easy for workers to request alternative PPE without embarrassment, delay or judgement. We will not penalise workers raising PPE concerns and ensure PPE supports dignity and inclusion.
- 5 PARTNERSHIP**
We will consult with GMB reps and staff on PPE trials, procurement choices, reporting and improvements. We will work with partners and contractors to embed inclusive PPE standards across our industry.



SCAN HERE FOR MORE!

www.gmb.org.uk/ppe-fit-for-all

By signing GMB's Inclusive PPE Charter, employers can demonstrate leadership, improve workforce safety, strengthen inclusion and ensure PPE genuinely protects every worker.

The goal is simple:

Fit-for-form PPE is PPE fit for all. Every worker deserves equipment that protects them effectively, comfortably and with dignity.

If you are interested in signing up, speak to your local contact at GMB or email:

melanie.bartlett@gmb.org.uk



INCLUSIVE PPE REVIEW CHECKLIST

PPE SAFETY & INCLUSIVITY CHECKLIST FOR GMB SAFETY REPRESENTATIVES				
GENERAL COMPLIANCE	NO ACTION REQUIRED	ACTION REQUIRED	URGENT ACTION REQUIRED	NOTES
PPE meets relevant safety standards (e.g., CE marking, UKCA).				
Documentation and certification available and up to date.				
Suitable for the specific hazards identified in the workplace.				
Proper storage and maintenance procedures are in place.				
FIT AND SIZING	NO ACTION REQUIRED	ACTION REQUIRED	URGENT ACTION REQUIRED	NOTES
Clothing available in a full range of sizes and cuts to fit all workers				
Adjustable features provided to ensure proper fit.				
Shoes / boots are specifically made for male and female foot shapes (not unisex fit) Items such as gloves, goggles, masks and hearing protection are not 'one size fits all'				
Harnesses, stab /bullet proof vests, RPE, and other specialist PPE is made to fit the body shapes of all workers required to wear them (not unisex fit)				
Fit testing is conducted where required.				
PPE does not compromise comfort or mobility.				
Maternity-safe PPE is available where needed.				
PPE accommodates religious dress (e.g., turbans, hijabs).				
Alternative designs available where standard PPE conflicts with beliefs.				
PPE suitable for workers with disabilities where required.				
Adjustments made or alternative PPE supplied to be worn with hearing aids, glasses, prosthetics, etc.				

COMFORT & USABILITY	NO ACTION REQUIRED	ACTION REQUIRED	URGENT ACTION REQUIRED	NOTES
PPE is comfortable for extended wear. Does not cause excessive heat, pressure, or irritation.				
It is easy to put on, remove, and adjust.				
It is compatible with other PPE when worn together.				
PPE doesn't create unnecessary barriers to performing duties.				
WORKER CONSULTATION & FEEDBACK	NO ACTION REQUIRED	ACTION REQUIRED	URGENT ACTION REQUIRED	NOTES
Workers consulted during PPE selection process.				
Trials of new equipment carried out by a wide range of workers.				
Feedback system in place for reporting issues.				
Concerns are acted on promptly.				
TRAINING & AWARENESS	NO ACTION REQUIRED	ACTION REQUIRED	URGENT ACTION REQUIRED	NOTES
All workers are trained in the correct use of PPE.				
Information is provided in accessible formats.				
Training considers language and literacy needs.				
MAINTENANCE & REPLACEMENT	NO ACTION REQUIRED	ACTION REQUIRED	URGENT ACTION REQUIRED	NOTES
Regular inspection and maintenance carried out.				
Damaged or worn PPE replaced promptly.				
Clear and simple reporting process for faults.				

CONDUCTING AN INCLUSIVE PPE REVIEW

Employers should undertake a structured review of current PPE arrangements.



STEP 1 – AUDIT EXISTING PROVISION

Review:

Current PPE inventory.	
Available sizes and designs.	
Existing supplier arrangements.	
Reported PPE issues.	
Accident and near-miss records.	

STEP 2 – GATHER WORKFORCE FEEDBACK

Consult workers directly about:

Fit.	
Comfort.	
Usability.	
Availability.	
PPE modifications workers have made themselves.	

STEP 3 – IDENTIFY GAPS

Assess whether any workforce groups are disproportionately affected.	
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STEP 4 – TRIAL ALTERNATIVES

Run trials involving workers from different:

Genders.	
Body shapes and sizes.	
Ethnic backgrounds.	
Age groups.	
Disability groups.	
Religious backgrounds.	

STEP 5 – IMPLEMENT IMPROVEMENTS

Update specifications and purchasing arrangements based on evidence.	
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STEP 6 – MONITOR OUTCOMES

Track complaints, incidents, worker satisfaction and PPE replacement requests.	
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**SCAN
HERE
FOR MORE !**

www.gmb.org.uk/campaigns/ppe-fit-for-all/



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