

## Facial Hair & Face Fit Testing

The Equality and Human Rights Commission has just published new guidance on religion and belief in the workplace. It's a good starting point if you need further information.

Unless facial hair is a mandatory requirement of an employee's religion or faith, e.g. a Sikh's beard, you have every right to impose a clean-shaven rule on male staff via a dress and appearance policy. However, it must be consistently applied - you can't come down hard on one breach yet turn a blind eye to another.

As a general rule, you are perfectly entitled to specify the standards of dress, appearance and personal hygiene in your workplace and dismiss those employees who unreasonably fail, or routinely refuse, to comply with your stated requirements. However, any such standards, or rules, that you seek to impose must always be:

1. reasonable
2. consistently applied and enforced (you can't come down hard on one employee's breach yet ignore another's); and
3. appropriate to the role performed by an employee.

Health and safety legislation requires that employers must protect the health, safety and welfare at work of all their employees, as far as is reasonably practicable; it also states that employees have a duty to take care of their own health and safety and that of others who may be affected by their actions at work.

Employees must co-operate with employers and co-workers and comply with reasonable requests made by them, to help everyone meet their legal requirements.

Where RPE has been identified as a control measure, for any task, it is important that the RPE is adequate and suitable.

To ensure that the selected RPE provides adequate protection for individual wearers, the Approved Codes of Practice supporting the Control of Substances Hazardous to Health Regulations and the Control of Asbestos Regulations stipulate that tight-fitting RPE must be 'fit tested'.

This helps to ensure that inadequately fitting face pieces are not used. Ill-fitting face pieces can create inward leakages of airborne contaminants.

Individual face fit tests are required to ensure that the appropriate RPE is available.

The tests require individuals to be clean shaven as this affects the seal of the mask to the face and its ability to perform correctly.

Once individuals have had their face fit test, they must ensure that whenever the task that they are doing requires the use of a close fitting mask, they are clean shaven so that the

mask performs correctly.

If a member of staff is found wearing a mask and is not clean shaven, for their own safety they will be stopped from working until they have shaved.

In accordance with Health and Safety legislation and guidance, provision has been made for those who for either religious or medical reasons are unable to wear close fitting masks and we have even extended this to those people who have had a substantial beard for a number of years. This is done by way of powered hood respirators.

It is in all our interests to ensure that we comply with all relevant Health and Safety Legislation and regulations.

Your fit test doesn't last forever – after your initial fit test it is good practice to regularly repeat fit testing. 282/28 is not prescriptive on the re-test period, although it guides those doing licensed asbestos removal to re-test annually. The only stipulations are that you should be re-tested when you 'lose or gain weight', 'undergo substantial dental work' or 'develop any facial changes. However, because it can be difficult to accurately measure these changes, industry best practise is to re-test regularly, usually at 2 year intervals, dependant on the risk of exposure and frequency that RPE is worn.

The one question that nearly always comes up is in relation to facial hair.

What do I do if I have an employee with facial hair?

Can I fit test them with facial hair and just see if they pass?

The answer is very simple - close fitting RPE that must be fit tested for cannot be worn with facial hair of more than 24 hour's growth. That means clean shaven when **worn** as well as **tested**. You can't just turn up for your fit test clean shaven, pass the fit test and then decide next week you will wear it with a beard. You have to wear your mask clean-shaven for it to be effective and to be compliant.

What can you do then if you have facial hair or persons working with you have facial hair, and Respiratory Protection is required?

You have one of two choices.

First option you have is to change your or your employees job scope. Find a job that doesn't require the use of RPE or engineer something into the task that removes the requirement for respiratory protection.

Second is to use a loose fitting powered air hood, a quick example would be something like [this](#). Here the system protects the user by providing a clean air flow into a loose fitting hood, rather than relying on a seal to the face. We will cover in more detail the use of Powered Air systems in our upcoming article.

The one thing that you absolutely cannot do is potentially expose you or your staff to respiratory hazards.