

Personal Protective Equipment at Work Regulations 2025 Consultation Report

PUBLIC CONSULTATION RESULTS

Health and Safety Inspectorate

Version Control

1	Health and Safety Inspectorate (HSWI)	13/05/2026	Initial
2	HSWI	01/06/2026	Review

Personal Protective Equipment at Work Regulations 2025 Consultation Report

<https://consult.gov.im/environment-food-and-agriculture/personal-protective-equipment-at-work-regulations>

This report was created on Wednesday 13 May 2026 at 09:11

The activity ran from 29/10/2025 to 31/03/2026

Responses to this survey: 9

EXECUTIVE SUMMARY OF RESPONDENT COMMENTS:

Respondents showed strong overall support for the proposed Personal Protective Equipment (PPE) Regulations, particularly the move to align with UK standards, which is seen as a practical way to improve consistency, clarity, and worker protection. However, this support is clearly conditional on delivery with respondents repeatedly highlighting the need for a proportionate, well-paced implementation that would reflect the Island's scale and would avoid placing undue burden on smaller organisations.

While the draft proposals were generally considered clear, there was a consistent underlying message that practical guidance, tailored examples, and accessible support would be critical to enabling compliance in real-world settings. Concerns centred on capacity and cost, including limited training and occupational health provision, pressure on consultancy and support services, and the challenge of aligning implementation with fixed budgeting cycles, particularly for public bodies and smaller employers.

There was also a strong theme around the cumulative impact of wider regulatory change, with respondents urging a coordinated, joined-up approach to avoid duplication and escalating costs. Overall, respondents were supportive of the policy intent but emphasised that achieving the desired safety outcomes would depend on clear guidance, realistic timeframes, and coordinated support mechanisms that would make compliance achievable in practice.

We asked:

The Department of Environment, Food and Agriculture (DEFA) has been reviewing specific UK Health and Safety legislation to form a judgment on whether the Island would benefit from greater alignment with UK Health and Safety Executive (HSE) standards. As part of that process, consideration has also been given to whether this UK HSE legislation would enhance public and worker safety for offshore energy developments. This process has culminated in public consultation of specific draft legislation, with the starting point for most of the legislation being existing UK legislation.

DEFA has welcomed stakeholder and public feedback on the proposed health and safety legislation, and where appropriate any associated guidance documentation, through this public consultation process.

You Said:

Respondents support aligning with UK standards to improve consistency and protection, but stressed that implementation must be proportionate, properly supported, and realistic in terms of cost, capacity, and timing, particularly for smaller organisations, supported by clear guidance, practical tools, and a coordinated approach to avoid undue burden.

We did:

The DEFA Health and Safety at Work Inspectorate (HSWI) is grateful to all those who took the time to consider and respond to this consultation.

Due to the December 2025 holiday period and the limited number of initial responses received, it was decided to extend the closing date of the outstanding health and safety legislation consultations to 31 March 2026.

The consultation process and responses received informed the Department's assessment of the benefits of the proposed legislation. All consultation responses were considered in detail, alongside direct engagement with relevant Manx businesses. The consultation process has therefore informed the Department's decision making. Having considered all available information, the Department has decided to pause the introduction of this tranche of legislation until further notice.

Further engagement between DEFA HSWI and the UK Health and Safety Executive (HSE) will take place in June 2026. Should the Department subsequently decide to proceed with the introduction of any of the draft legislation, this will first be reviewed against the latest position of the relevant UK legislation and updated where necessary. If any substantive changes are made as a result, a further public consultation exercise may be undertaken.

Personal Protective Equipment at Work Regulations 2025 Consultation Report

CONSULTATION QUESTIONS

Question Number	Title	Total Responses
1	Do you agree that the Isle of Man should follow UK standards and processes for health and safety laws and its regulation?	9 (100.00%)
2	Are there any parts of the legislation being consulted upon that require more clarity to aid understanding and assist with compliance?	8 (88.89%)
3	Is the proposed implementation strategy and timescale for the introduction of the Personal Protective Equipment at Work Regulations 2025 appropriate for industry readiness?	9 (100.00%)
4	Are there any specific support mechanisms (e.g. guidance, training, transitional arrangements) that would help you or your organisation prepare for the new legislation?	9 (100.00%)
5	Do you have any other comments on the draft Personal Protective Equipment at Work Regulations 2025 legislation attached to this stage of the overall consultation process?	6 (66.67%)
6	Is there anything else you'd like to tell us about the proposed changes or the consultation process?	7 (77.78%)

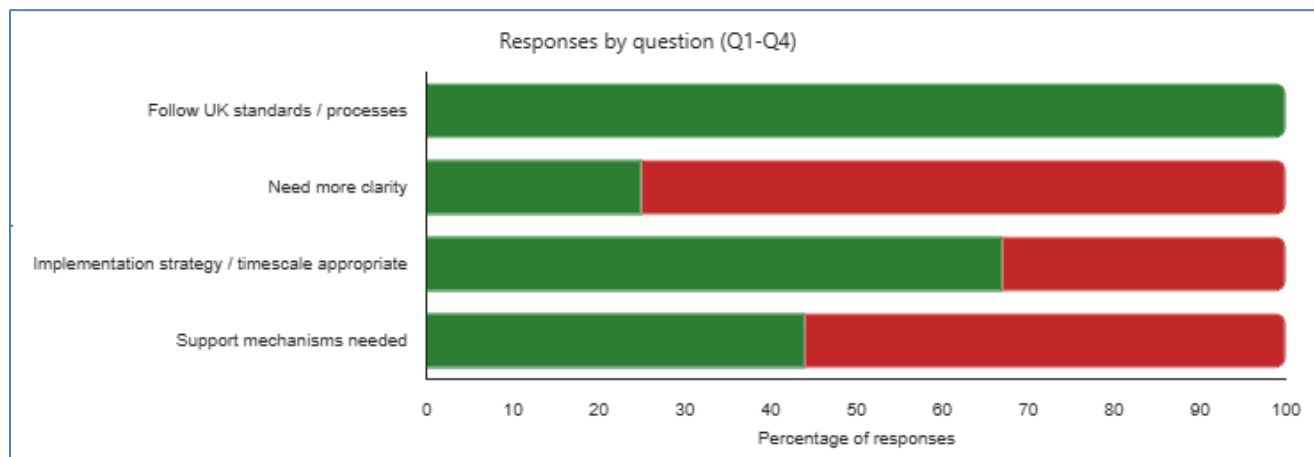


Fig 1:
Question (Q1–Q4) - Percentage of Responses (Yes/Agree, No/Disagree, Not Answered)

CONSULTATION QUESTIONS – INDIVIDUAL SUMMARY OF RESPONSES BY QUESTION

Q1. Do you agree that the Isle of Man should follow UK standards and processes for health and safety laws and its regulation?

Comments strongly supported alignment on the basis that UK health and safety legislation is well-established, evidence-based and already widely used in practice on the Island (including reliance on UK guidance/ACOPs), improving clarity and consistency, particularly where contractors and offshore activities intersect with local work. A recurring nuance was that, while alignment would be welcomed, respondents also wanted the approach to remain proportionate and flexible enough not to unduly burden smaller organisations, with one respondent also asking for technical consistency (e.g., mirrored regulation numbering/structure) to make cross-referencing easier.

Q2. Are there any parts of the legislation being consulted upon that require more clarity to aid understanding and assist with compliance?

Where additional clarity was requested from respondents, it focused less on the legal intent and more on practical, task-based guidance to support compliant implementation in small/public-sector settings, especially around what “proportionate” looks like in terms of PPE assessment/documentation, expectations in mixed/tenant-facing environments (e.g., social housing), delineation of responsibilities where staff and multiple contractors overlap, and clearer signposting on how PPE duties interact with asbestos/legacy risks and biological/infectious hazards. Respondents also asked for worked examples tailored to the types of operations common to local authorities and independent living/communal residential settings.

Q3. Is the proposed implementation strategy and timescale... appropriate for industry readiness?

Supportive responses said the lead-in time would appear to be reasonable to allow employers to review risk assessments, PPE provision and training. However, concerns (including from local authority and housing-related bodies) centred on budget-setting cycles and the difficulty of absorbing new statutory costs without sufficient certainty and lead-in time, particularly where balanced budgets must be set by fixed deadlines or where income/allowances are controlled externally. Respondents also highlighted potential constraints in local training capacity, increased demand on H&S consultancies, and the risk of disproportionate cost impacts on smaller organisations; some flagged that readiness would not only be about PPE procurement but also access to competent advice and specialist capability (e.g., measurement/assessment expertise) where required.

Q4. Are there any specific support mechanisms (e.g. guidance, training, transitional arrangements) that would help you or your organisation prepare for the new legislation?

Responses were mixed (4 “Yes”, 5 “No”), but those requesting support were highly consistent in what would help most. Suggested mechanisms included early publication of final Manx-specific guidance, practical awareness and training sessions (including workshops/forums/focus groups), and clear signposting to existing UK HSE PPE guidance, especially on PPE suitability, maintenance and training expectations. Several respondents asked for templates (PPE assessments, risk assessments and worked examples) covering common local authority and housing activities, plus clearer guidance on PPE for infectious disease/biological risks. There were also repeated calls for central coordination to reduce

duplicated effort and cost (e.g., recommended consultant frameworks), consideration of phased implementation aligned to budget cycles, and, where costs would be unavoidable, exploring financial support or transitional arrangements so compliance does not unduly affect service delivery, rents, or ratepayers.

Q5. *Any other comments on the draft PPE Regulations 2025?*

Additional comments were limited but pointed: with one emphasising that the Regulations would strengthen worker protection by reinforcing employer responsibility to provide suitable, well-maintained PPE at no cost to workers. Others placed the PPE Regulations within the wider programme of H&S legislative reform (e.g., noise/vibration consultations) and urged Government to consider the cumulative administrative and financial burden, particularly for small local authorities and joint boards, rather than assessing each change in isolation.

Q6. *Anything else about the proposed changes or the consultation process?*

Respondents noted a few broader implementation dependencies: limited occupational health capacity on-Island (with a need to increase provision if health surveillance expectations expand) and welcomed extending consistent PPE standards to offshore activities. Process-wise, feedback was generally positive about the clarity of the consultation materials, while reiterating that successful delivery hinges on a coordinated, proportionate, well-supported rollout that recognises small-organisation realities (limited staffing, fixed budget cycles, and accountability to ratepayers/residents) to avoid unintended affordability or service impacts.