Since Issue 4 the following sections have been updated:-

- [6] Survey Reinspections
- [7] 4SC – Arrangement

The updated sections reflect:

- Removing recent operational reference to the self-declaration process relating to reinspections
- 4SC arrangements – the addition of reporting criteria for non-licensable activities and the need to record failures
- A change to accepted qualifications demonstrating competency

As part of UKAS’s commitment to providing a valid accreditation service to the asbestos sector UKAS reviews its asbestos-related policies, procedures and requirements on an ongoing basis through the Asbestos Technical Advisory Committee (a list of committee members and summary of minutes are available on the UKAS website www.ukas.com Asbestos). UKAS also continues to discuss the assessment of the requirements of ISO/IEC 17020, ISO/IEC 17025 and sector-related publications, to ensure a consistent assessment approach, during its regular Asbestos Technical Assessor meetings.

UKAS will publish Technical Bulletins relating to accreditation within the asbestos sector to ensure all applicant and accredited organisations are aware of any necessary clarifications, interpretations, updates or changes to UKAS policy, requirements where issues have been raised, discussed and agreed at the above meetings. The content of these bulletins will be incorporated into relevant UKAS Publications (i.e. LAB 30 and RG 8) at their next revision.

The following items are included in this bulletin:

[1] Colour Blindness Testing
[2] Field Blank Samples
[5] Surveying for Asbestos in Marine Vessels
[6] Survey Reinspections
[7] 4SC – Arrangements
[8] Lab 30 Qualification

1. Colour Blindness Testing
Organisations conducting colour blindness assessments in-house must use the correct colour plates and have a member of staff competent to accurately interpret the results. Where identified records must clearly demonstrate continuing suitability of an individual as an analyst with assigned condition.

2. Field Blank Samples
Organisations need to define a ‘job’ to ensure field blanks are sufficiently traceable.
3. Multi-site Accreditation, Satellite Offices and Temporary Sites

Accredited organisations are reminded of the requirements within the UKAS Agreement to inform UKAS of any significant changes within their organisation and operations. Two changes to note here are key staff and location changes. This includes changes in Technical and Quality management and any changes to the operational locations. UKAS must be notified of all offices associated with the accredited organisation and confirmation that work is / is not undertaken at or away from that office (including any aspects of contract review). The Assessment Manager will then determine if this needs to be included on the schedule of accreditation and included within the 4 year accreditation cycle. UKAS must also be made aware of temporary site office / laboratories set up for longer term contracts (those >8 weeks) e.g. power stations, and sites including non-UK domicile locations. Please ensure all this information is communicated to your UKAS Assessment Manager as soon as it is known (e.g. staff notice given, contract agreed etc): If unsure of the significance of the change then please bring to the attention of your Assessment Manager. Further information on multi-site accreditation can be found within UKAS publications TPS 51 & TPS 59 (www.ukas.com publications).

4. Asbestos Qualifications

UKAS has previously set its policy on asbestos surveyor and analyst qualifications following input and recommendations from its Asbestos Technical Advisory Committee. This policy is stated in UKAS publications LAB 30 for testing and RG 8 for inspection, which require that all analysts and surveyors must hold formal recognised qualifications (in addition to demonstrable knowledge, experience and in-house training) in order to be authorised to undertake specified asbestos activities.

The main providers of qualifications recognised by UKAS are the British Occupational Hygiene Society (BOHS), through its Proficiency Modules and more recently the Asbestos Testing and Consultancy (ATAC) Level 3 qualifications administered by the Royal Society for Public Health (RSPH).

In 2014 the BOHS notified UKAS of an intent to revise the P402 module to remove the requirement for candidates to submit two field reports for assessment as part of the qualification. Additionally, for those surveyors who wish to improve their report writing skills and to gain formal recognition of these skills, it was also proposed to introduce an optional report writing module. The proposed changes were reviewed by UKAS and discussed at the UKAS Asbestos TAC (August 2014). UKAS can confirm that the revised P402 qualification is accepted. The RSPH Level 3 Certificate in Asbestos Surveying remains unchanged.

The title of the P402 module as of 1st September 2014 became the P402: Surveying and Sampling Strategies for Asbestos in Buildings, and the title of the optional reporting module is P402RPT: Report Writing for Asbestos Surveys.

The current P402 Refresher modules remain unchanged.

There has been further consideration of accepted qualifications and, following review and input from stakeholders as represented by the UKAS Asbestos Technical Advisor Committee, we can now confirm that the value of the proposed RSPH Level 4 Certificate in Asbestos Laboratory and Project Management is recognised by UKAS for its intended purpose of preparing individuals for managing asbestos testing and/or survey operations and
this is now being offered by RSPH. The proposed qualification has been designed to provide the necessary support for competence defined in Clauses 8.1.1 & 8.1.2 of LAB 30 Edition 3 and consequently the Tables in LAB 30 will be updated as soon as practicable to reflect UKAS’ recognition of the certificate as above.

Further details on these qualifications can be found at:

**BOHS:** [http://www.bohs.org/education/examinations/proficiency-modules/](http://www.bohs.org/education/examinations/proficiency-modules/)

**ATAC:** [http://www.atac.org.uk/asbestos-testing-consultancy-association-qualifications](http://www.atac.org.uk/asbestos-testing-consultancy-association-qualifications)

**RSPH:** [https://www.rsph.org.uk/qualifications/centres/arca-training-centre.html](https://www.rsph.org.uk/qualifications/centres/arca-training-centre.html)

5. Surveying for Asbestos in Marine Vessels

The UKAS process for assessing and accrediting asbestos inspection bodies was developed at the request of the Health and Safety Executive (HSE) in 2001. The subsequent pilot scheme was based on a programme to support the requirements of MDHS100 in non-domestic premises.

Current schedules of accreditation for asbestos inspection are based on the initial scheme along with subsequent guidance as issued by the HSE. These are supported by ongoing assessment by UKAS of organisations accredited to ISO/IEC 17020 of domestic, commercial and industrial categories of land-based buildings.

For marine vessels used within international waters and registered with the International Maritime Organisation (IMO) the requirements for surveying of such ‘premises’ differ from the current UK guidance as currently published in HSG 264, and which UKAS accreditation of asbestos surveying is currently based. Although UKAS recognises that UK Regulations cover the normal operation of marine vessels in UK waters and docks, separate accreditation will be required for those organisations that wish to undertake surveys of marine vessels to an accredited standard including:

- Cargo vessels
- Passenger vessels, and
- Off-Shore vessels and Facilities

as specified by the Safety Of Life At Sea (SOLAS) Convention Chapter II-1, Regulation 3.5.2 (1974 as amended) for the sole purpose of generating asbestos condition reports, (Initial, Verification and In-service, including management recommendations where appropriate).

This decision has been based on a pilot assessment which was tailored to address the specifics associated with surveying of marine vessels. This identified (amongst other aspects) that the technical competence required to undertake such surveys differed significantly from experiences associated with normal land-based building surveying.

UKAS would be willing to develop an accreditation programme for this sector to meet the needs of its customers and stakeholders (such as the Maritime and Coastguard Agency). However, it does recognise that work will be required in order to ensure the programme is fully effective in determining the competence of asbestos surveying on marine vessels, and in meeting relevant international guidelines and requirements as well the minimum requirements of ISO/IEC 17020. Therefore dependent on feedback from stakeholders, if
sufficient support for such a programme is received then UKAS will look at the viability for setting up a development project and steering committee to take this forward.

Any organisation with a keen interest in participating in such a pilot programme should contact Louise Wainwright at: Louise.Wainwright@ukas.com.

UKAS considers marine vessels at this moment in time to mean boats/ships and (actively) mobile platforms. UKAS understands that a number of Inspection Bodies are involved with surveys within the marine sector. Therefore where IBs have been surveying fixed rigs & platforms, they will be permitted to continue to do so under ‘industrial premises’, so long as competence has been suitably demonstrated. However, IBs should be aware that the UKAS position may change in the future pending input from marine stakeholders if a development project and steering committee is developed.

6. Survey Reinspections

The process of a reinspection is (by strict definition) to reassess the condition of previously identified asbestos containing materials (ACMs) only. Accredited IBs use standard methodologies to achieve this, as they would do in completing a normal management survey. Internal procedures and systems in operation by accredited IBs must ensure that they are capable of capturing and dealing with requirements for undertaking reinspections, including those concerning contract review, reporting of this work and training and competency. The minimum requirement for individuals is to hold the P402/RSPH Level 3 Certificate in Asbestos Surveying, with supported documented training and authorisation.

Accredited inspection bodies who decide not to conduct reinspections under their accreditation must not claim accreditation for this activity, either through contract review or reporting processes. When conducted as an unaccredited activity suitable documented measures must be implemented by the accredited IB to ensure that aspects which affect the scope of a reinspection (whilst being conducted on-site) are then covered by the accredited IBs’ policies and procedures, for example, if a previously non-accessed area is accessed and surveyed, or as a result of applying duty of care to previously unidentified suspect asbestos containing material.

The time period for receipt of the self-declaration was set as the 17th July 2015. A number were received after this date and were processed as part of the tranche of schedules updated on the 31st July. Any Inspection Body (IB) which subsequently decides it wishes to be accredited for reinspections, will need to apply via an AC2 as per ETS requirements.

7. 4 Stage Clearance (4SC)

Arrangements
To ensure competence is suitably witnessed during a four cycle accredited cycle, the policy for witnessing the 4SC remains as follows:-

- To observe a 4 Stage Clearance at every scheduled assessment

Whilst recognised that potentially more complex enclosures will not facilitate all 4 stages to be witnessed in one day, a Laboratory is still required to demonstrate competence in the accredited activity and efforts to provide such witnessing needs to be provided to UKAS on an annual basis.
When cooperation by Licensed Asbestos Removal Contractors (LARCs) is not apparent, or when such activities are either not available during assessment or outside the normal working hours, Monday to Friday, then this needs to be reported to the Laboratory’s Assessment Manager in a timely manner. This is to enable alternative arrangements to be considered/implemented and avoid unnecessary costs and delays to the Laboratory’s accreditation being maintained or renewed respectively. UKAS will continue to accommodate the witnessing of the 4SC when practicable. The HSE will be informed of any instances whereby LARCs are not being cooperative.

**Reporting of Non-licensable Works**
Further to the 16th Asbestos TAC meeting minutes (12-03-2014, AOB pt iv) the following statement is to clarify the extent of 4SC reporting.

The HSE has reinforced that 4SC or CoR are not required on non-licensed works. A certificate of cleanliness (different from CoR) should be issued where appropriate e.g. for large scale Textured Coating (TC) removal. Anything more is exceeding requirements, but is not banned. If an organisation wishes to have a 4SC conducted in such scenarios, then the Laboratory has to inform their client that it is not needed via Contract Review.

**Reporting of 4SC Failures**
Evidence from UKAS assessments indicates that accredited laboratories will only highlight a failure where this has been part of a complaint/nonconforming work investigation within the quality system. However UKAS assessment feedback indicates that over half are failing during the process when witnessed as part of on-site visits (at one of the 4 stages) and it's not clear if this is representative of all 4SC undertaken by accredited organisations in the UK.

The occurrence of reported failures is generally not readily available within Organisations’ quality records, especially those with paper based reporting systems. Therefore as part of ongoing continuous improvement Laboratories are now required to facilitate such data capture to enable a more comprehensive review and understanding of the issues being experienced. This is to support the numbers of 4SC data already requested on the pre-annual assessment declaration (PAAD) with the Stage at which the clearance has failed, along with reported justification for the failure. This information is to be used, in conjunction with the HSE, to identify potential root-cause(s) for the issue(s) being established, to enable appropriate corrective action(s) to be implemented accordingly.

**8. Lab 30 Qualification**
Section 9 of Edition 3 of this publication (February 2014) detailed the requirements of asbestos bulk laboratories with regards to the numbers of samples/points permissible to be analysed by laboratory analysts. This has been inserted into Lab 30, edition 3. This policy continues to reinforce the requirements of HSG248, Appendix 2 section on Quality assurance (QA) and quality control (QC). Labs need to ensure their daily additional quality checks meet the requirements of both HSG248 and Lab 30 respectively.