



RG 8

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Accreditation of Bodies Surveying for Asbestos in Premises

CONTENTS

SECTION	PAGE
1 Introduction	3
2 Inspection Service	3
3 Administration Requirements (ISO/IEC 17020, Clause 3)	4
4 Independence, Impartiality and Integrity (ISO/ IEC17020, Clause 4)	5
5 Confidentiality (ISO/IEC 17020, Clause 5)	5
6 Organisation and Management (ISO/IEC 17020, Clause 6.2, 6.3, 6.4)	5
7 Quality System (ISO/IEC 17020, Clause 7.2)	6
8 Personnel (ISO/IEC 17020, Clause 8)	6
9 Facilities and Equipment (ISO/IEC 17020, Clause 9.1)	6
10 Inspection Methods and Procedures (ISO/IEC 17020, Clause 10.1, 10.2, 10.5, 10.8)	7
11 Handling of Inspection Samples and Items (ISO/IEC 17020, Clause 11.4)	11
12 Records (ISO/IEC 17020, Clause 12.3)	11
13 Inspection Reports and Certificates (ISO/IEC 17020, Clause 13.1, 13.2)	11
14 Subcontracting (ISO/IEC 17020, Clause 14.2)	11
15 Complaints and Appeals (ISO/IEC 17020, Clause 15.2)	11
16 Co-operation (ISO/IEC 17020, Clause 16)	12
References	13

CHANGES SINCE LAST EDITION

Numerous since the previous edition, changes include update to reference documentation and update/clarification on UKAS policy as a result of the publication of HSE guidance HSG264 Asbestos: The Survey Guide.

1 INTRODUCTION

- 1.1 The purpose of this publication RG 8, is to give guidance on the application of certain clauses of ISO/IEC 17020:1998 - *General Criteria for the Operation of Various Types of Inspection Bodies*¹, Accredited inspection bodies are required to comply with all the requirements of ISO/IEC 17020.
- 1.2 RG 8 should be read in conjunction with ISO/IEC 17020 and IAF/ILAC-A4:2004 *Guidance on the Application of ISO 17020*².
- 1.3 RG 8 has been produced by UKAS and a working group consisting of representatives from the Health and Safety Executive, local authorities, professional bodies, contractors, training organisations, laboratories, inspection bodies and customers.
- 1.4 RG 8 shall be used for accreditation of bodies inspecting for asbestos in premises as noted in the *Control of Asbestos Regulations*³ (CAR). It is intended to provide guidance to Inspection Bodies who will assist ‘duty holders’ in meeting their statutory obligations by selection of ‘competent bodies’ for the purposes of the Regulations
- 1.5 Unless stated otherwise, the terms used in this publication are consistent with terms used in the CAR, ISO/IEC 17020 and HSE guidance HSG264⁴ *Asbestos: The Survey Guide*.
- 1.6 Accreditation to ISO/IEC 17020 of an inspection body should not be confused with personnel certification, where a certification body issues a certificate of competence to an individual to undertake specified tasks. ISO/IEC 17020 and this RG 8 set out ‘competence criteria’ for the organisation, including those individuals who perform technical functions within it.

2 INSPECTION SERVICE

- 2.1 Inspection bodies may be accredited for one or more of the following types of surveys:
 - (a) Management Survey: to locate, as far as reasonably practical, the presence and extent of any suspect asbestos containing material (ACM) in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.
 - (b) Refurbishment and Demolition Survey: to locate and describe, as far as reasonably practicable, all ACMs in the area where refurbishment work will take place or in the whole building if demolition is planned.

Details of the work scope covered under each type of the above surveys are described in HSG 264.

- 2.2 Inspection bodies may also be accredited for priority assessment by providing technical support services when assisting the “duty holder” in the development of an asbestos management plan - It is important to remember that this element of accreditation is a “support service” and the ultimate responsibility for the management of asbestos in premises lies with the “duty holder”. Inspections bodies should consider the guidance in HSG 227 for priority risk assessment procedures and ensure that clear, traceable, robust records of dialogue between the inspection

body and its customer have been established: it is important to demonstrate that the customer has identified the use of the surveyed areas, not the surveyor.

- 2.3 Where the inspection body intends to develop its surveying activities into unfamiliar sectors, such as domestic, commercial and industrial, then it should define the approach to developing its capability.
- 2.4 Where an inspection body is accredited for Management and/or Refurbishment/Demolition Surveys, ISO/IEC 17020 accreditation will cover the sampling of bulk material for the presence of asbestos. UKAS will use its Publication LAB 30, *Application of ISO/IEC 17025 for Asbestos Sampling and Testing*⁵ and the relevant HSE guidance for the assessment of the sampling of bulk material under laboratory/site testing conditions. Laboratories that hold UKAS accreditation to ISO/IEC 17025, *General Requirements for the competence of testing and calibration laboratories*⁶, for the sampling of bulk materials may obtain accreditation to ISO/IEC 17020 by seeking an extension to its scope to include the surveying activities.
- 2.5 An inspection body that does not have its own facilities for the sampling of bulk materials for the presence of asbestos may be accredited to ISO/IEC 17020 for Management and/or Refurbishment/Demolition surveys. Such an inspection body will be required to demonstrate that it has formal contractual arrangements with organisations accredited for the sampling of bulk material in accordance with the guidance given in this RG 8.
- 2.6 Samples taken by an accredited organisation shall be analysed by a laboratory holding UKAS accreditation to ISO/IEC 17025 for the appropriate testing activities.

3 ADMINISTRATION REQUIREMENTS (ISO/IEC 17020, Clause 3)

- 3.1 The UKAS accreditation schedule will state the type of survey for which accreditation is granted, as defined in HSG 264. Where inspection bodies are accredited for priority assessments this will also be reflected in the UKAS accreditation schedule along with the in-house methods used for inspection bodies for performing priority assessments.
- 3.2 The precise scope of the survey should be detailed in a survey plan or a confirmation letter to the inspection body's customer. If any of the services offered by the inspection body are not covered by UKAS accreditation, then this should be made clear to the customer. If the inspection body provides re-inspection services these shall be clearly defined within the contract review process to ensure the customer is fully aware of the services being provided.
- 3.3 The accounts of an organisation shall be independently compiled or audited as per legislative requirements.
- 3.4 Suitable insurance cover shall be obtained by the inspection body. These include Employers Liability, Public Liability and Professional Indemnity insurance. Inspection bodies shall ensure that cover for 'bodily injury' and 'property damage' is included within the Professional Indemnity insurance policy.
- 3.5 The inspection body's terms and conditions of business shall form part of the controlled documents system and shall be conveyed to the customer prior to the commencement of any works.

4 INDEPENDENCE, IMPARTIALITY AND INTEGRITY (ISO/IEC 17020, Clause 4)

- 4.1 Inspection bodies operating as Type A, B or C bodies as defined in ISO/IEC 17020 may be accredited for surveying of asbestos in premises. Guidance on the definitions of Type A, B & C inspection bodies are given IAF/ILAC-A4:2004.
- 4.2 It is important to ensure the independence, impartiality and integrity of all types of inspection bodies, when carrying out surveys of asbestos in premises. Therefore, when providing inspection services it is imperative that no inducement is offered or implied, in particular with regards to reducing the charge for the survey in return for the opportunity to carry out any resulting work. Also, the inspection body should be able to demonstrate valid reasons for any proposed course of action. It should be clear, for example, why a certain number of samples were taken for a premises survey or why a particular type of recommendation was proposed.
- 4.3 Where an inspection body or its staff are involved in asbestos remedial works, consultancy and/or project management of asbestos related activities or other similar activities, the inspection body is likely to be considered as Type C. A Type C inspection body is required to have 'safeguards' (see Annex C of ISO/IEC 17020) within the organisation to ensure adequate segregation of responsibilities and accountabilities through appropriate reporting structures.

5 CONFIDENTIALITY (ISO/IEC 17020, Clause 5)

- 5.1 No specific guidance given to this clause.

6 ORGANISATION AND MANAGEMENT (ISO/IEC 17020, Clause 6.2, 6.3, and 6.4)

- 6.1 The persons who perform supervisory activities of the asbestos surveyors should have the expertise shown in Section 8.2 below.
- 6.2 Monitoring of the performance of surveyors should include on-site witnessing of surveys. On-site witnessing of surveys should be carried out by suitably trained staff who are technically competent and are sufficiently independent to carry out the witnessed surveys objectively. The inspection body's programme for witnessing surveyors should be designed so that a representative sample of surveying activities are covered each year and that, as a minimum, each of the surveyors engaged in surveying is witnessed at least once in this period for each type of survey (i.e. management, refurbishment, demolition) for which they are authorised. Consideration should also be given to ensuring these audits cover the range of property types that the surveyor is authorised to inspect.

7 QUALITY SYSTEM (ISO/IEC 17020, Clause 7.2)

- 7.1 The inspection body's quality manual should indicate where in the quality system the requirements of ISO/IEC 17020 are addressed. When implementing the quality system the inspection body should consider the guidance given in this RG 8, IAF/ILAC A4, HSG 264 and HSG 248⁷ *Asbestos: The analysts' guide for sampling, analysis and clearance procedures*.

8 PERSONNEL (ISO/IEC 17020, Clause 8)

- 8.1 The inspection body should ensure that all persons undertaking surveys should have as a minimum the qualifications, experience and knowledge set out in Tables 1 and 2, unless they are working under the close supervision of appropriately qualified persons.
- 8.2 The persons responsible for the supervision of technical activities, in addition to the qualifications, experience and knowledge specified in Tables 1 and 2, should have experience in:
- (a) All areas of asbestos survey work including survey planning, resourcing, technical specifications, quality control and reporting and;
 - (b) Asbestos containing material assessment criteria.
- 8.3 Records held by the inspection body should indicate the competence of surveyors to perform survey work in different sectors, such as domestic, commercial and industrial, in which the inspection body's surveyors are authorised to perform surveys together with relevant evidence to support their authorisation.

9 FACILITIES AND EQUIPMENT (ISO/IEC 17020, Clause 9.1)

- 9.1 An example of a Survey and a Sampling Equipment Checklist is included in HSG 264.
- 9.2 For accreditation for Management and/or Refurbishment/Demolition surveys, the necessary equipment should include the items required to make good (where required) those areas from where the samples are removed. Sufficient equipment, or a means of cleaning equipment, should be available to minimise the possibility of cross-contamination and to minimise the risk of contaminating the area where samples are taken.

10 INSPECTION METHODS AND PROCEDURES (ISO/IEC 17020, Clause 10.1, 10.2, 10.5, and 10.8)

- 10.1 The general requirements for working with asbestos are specified in the CAR and these are amplified in the *Approved Codes of Practice* L143⁸ and L127⁹. The methods of surveying, sampling and assessment of asbestos containing materials are described in HSG 264 and HSG 248.
- 10.2 Based on the requirements in the above-mentioned documents, the inspection body should develop its own procedures, instructions, checklists etc, as necessary, to enable the surveyors to perform asbestos surveys effectively and consistently.
- 10.3 It should be noted that HSG 264 recommends quality assurance checks on building surveys be carried out on a regular basis by randomly reviewing a percentage of areas surveyed and subsequent assessment. These quality assurance checks should be conducted by surveyors, or suitably experienced staff, without prior knowledge of the areas to be re-surveyed to provide an unbiased assessment; subsequent comparison data of the two surveys shall be recorded.
- 10.4 During the review of contracts/instructions from the client by the inspection body, consideration should be given to the sector (e.g., domestic, commercial, industrial) in which surveying work is to be undertaken and the capability of the inspection body to provide surveying work in that particular sector.
- 10.5 Building surveys are covered by health and safety legislation including the CAR, and any persons managing such work will need to ensure that they have assessed the risks and put in place suitable control measures to minimise exposure to themselves and others. As other hazards may be present on-site, site-specific hazards should be identified and risk assessed prior to carrying out the survey. Common hazards may include, working at heights, potentially unsafe structures and confined spaces. If in any doubt, advice should be sought from a competent health and safety practitioner. Anyone carrying out an asbestos survey has a duty to take responsible care of themselves and others who may be affected by their actions.

Table 1

Qualifications, Experience and Knowledge Requirements for Organisations / individuals

ACTIVITY	QUALIFICATION	ACCREDITATION	STATUTORY REQUIREMENT
A Person carrying out an asbestos survey	Individuals to hold British Occupational Hygiene Society (BOHS) ¹⁰ P402 or Royal Society for the Promotion of Health (RSPH) ¹¹ Level 3 Certificate in Asbestos Inspection Procedures or CoCA (Certificate of Competency in Asbestos) or Cert Occ. Hyg. Or Dip Occ. Hyg.(which must include an asbestos module) plus relevant experience as in UKAS RG8 or qualifications required by the accredited personnel certification scheme	Recommended that the individual works for an organisation accredited as an Inspection Body to ISO/IEC 17020 and/or the individual holds personnel certification for asbestos surveying from a Certification Body that is accredited to ISO/IEC 17024	Not currently a requirement of CAR 2006
B Company carrying out an asbestos survey	Individuals to hold qualifications as detailed in A above. At least one member of the company must hold P402 plus have passed S301 (not necessary to hold the CoCA but this is strongly encouraged) or CoCA or equivalent qualification.	Recommended accreditation as an Inspection Body to ISO/IEC 17020	Not currently a requirement of CAR 2006
C Person taking a bulk sample	There is no formal UKAS requirement for this activity outside of surveying (see A above), but individuals are strongly recommended to hold BOHS P402 or RSPH Level 3 Certificate in Asbestos inspection Procedures or higher, or work under supervision of qualified surveyor	Recommended that the individual works for an organisation accredited as an Inspection Body to ISO/IEC 17020 or laboratory to ISO/IEC 17025 and/or holds personnel certification for asbestos surveying from a Certification Body accredited to ISO/IEC 17024	Not currently a requirement of CAR 2006
D Company taking a bulk sample	At least one member of the company must hold P402 plus S301 (not necessary for full CoCA but this is strongly encouraged) or CoCA or equivalent qualification. For individuals refer to C above.	Recommended accreditation as an Inspection Body to ISO/IEC 17020 or Testing laboratory to ISO/IEC 17025	Not currently a requirement of CAR 2006

E Person analysing a bulk sample	Individuals to hold BOHS P401 or higher (e.g. CoCA)	Works for or is an organisation holding Accreditation to ISO/IEC 17025	CAR 2006 applies
F Company analysing a bulk sample	Individuals to hold BOHS P401 or higher (e.g. CoCA)	Accreditation to ISO/IEC 17025	CAR 2006 applies

Note Accreditation for sampling can be achieved through ISO/IEC 17025 for testing laboratories or when carried out as part of a survey through ISO/IEC 17020 for Inspection Bodies. UKAS employ the same assessment criteria for both standards.

Table 2

Qualifications, Experience and Knowledge Requirements for Asbestos Surveyors

Types of Survey	Minimum Qualification	Minimum Experience	Knowledge
Management Survey	BOHS Proficiency Certificate in 'Building Surveys & Bulk Sampling for Asbestos' or other more wide ranging qualifications approved by BOHS (<i>See notes below</i>) or RSPH Level 3 Certificate in Asbestos Inspection Procedures	<p>- Six months appropriate experience in surveying in buildings, followed by</p> <p>- New Surveyor - At least five Management surveys for asbestos covering each category of building type as defined in Section 8.3 during which competence should be assessed by a fully qualified surveyor.</p> <p>- Experienced Surveyor – For authorisation to undertake all management surveys - At least one audit for each property type (one domestic, one commercial, one industrial) For authorisation to undertake management surveys in one property type at least two audits of the surveyor inspecting that property type, If authorisation is to be extended to other property types, a minimum of one further audit in that property type is required For both of the above scenarios one further audit to be completed within 3 months of authorisation.</p>	<ul style="list-style-type: none"> • Familiarity with the range, location and use of asbestos products, types of premises (for example domestic, commercial, industrial survey areas / properties) and age of premises. • Knowledge of the homogeneity of products and appropriate sampling strategies and their health & safety ramifications. • Familiarity with the current regulations, ACoP and guidance.
Refurbishment and Demolition Surveys	Same as for Management Survey	<p>- Six months appropriate experience in surveying in buildings, followed by</p> <p>- New Surveyor - At least five refurbishment /demolition surveys covering each category of building as defined in Section 8.3 during which competence should be assessed by a qualified surveyor. A spread between refurbishment and demolition surveys is required.</p> <p>- Experienced Surveyor -</p>	<ul style="list-style-type: none"> • Same as for Management Survey • Knowledge of building construction, voids within buildings, health and safety considerations of opening up any aspects of survey areas and equipment considerations for undertaking Refurbishment / Demolition surveys.

For authorisation to undertake all refurbishment / demolition surveys - At least one audit for each property type (one domestic, one commercial, one industrial)
 For authorisation to undertake refurbishment / demolition surveys in one property type at least two audits of the surveyor inspecting that property type, If authorisation is to be extended to other property types, a minimum of one further audit in that property type is required
 For both of the above scenarios one further audit to be completed within 3 months of authorisation. A spread between refurbishment and demolition surveys is required.

Notes:

The BOHS Proficiency Certificate in 'Building Surveys and Bulk Sampling' [P402] can be gained by successfully completing the written examination, practical assessment and the submission of two acceptable survey reports.

The other more wide ranging qualifications provided by BOHS and accepted by UKAS are:

- BOHS Certificate of Competence in Asbestos (*The first stage to reach the qualification of the "Certificate of Competence in Asbestos" is to either pass the examination BOHS Module S301 'Asbestos & other Fibres' or by gaining proficiency modules certificates P401 to P405 inclusive. Then this must be followed by the submission of an acceptable report, which will then allow candidates to proceed to the oral examination. Only on the successful completion of all stages will a "Certificate of Competence in Asbestos" be issued. (For details in obtaining this qualification see BOHS web site at www.bohs.org.uk)*)
- BOHS Certificate of Operational Competence in comprehensive Occupational Hygiene (Cert. Occ. Hyg.), which includes a study of asbestos within the course content.
- BOHS Diploma of Professional Competence in comprehensive Occupational Hygiene (Dip. Occ. Hyg) which includes a study of asbestos within the course content.

Qualifications/experience other than specified above may be accepted but these must be reviewed and agreed by UKAS, on a case-by-case basis.

Any proposed alternative qualifications should therefore be submitted to UKAS for review and agreement.

Where the survey is being carried out by a small team, it is not anticipated that every member of the team must be trained to the same standard. For example, an assistant surveyor may be included in the survey team provided that they are working under the close supervision of a suitably qualified person.

Other support staff that may be involved with the surveying activities should have the relevant level of training for the tasks they are undertaking.

11 HANDLING OF INSPECTION SAMPLES AND ITEMS (ISO/IEC 17020, Clause 11.4)

11.1 Requirements and guidance for handling inspection samples are defined under Sampling Procedures in HSG 264 and HSG 248.

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12 RECORDS (ISO/IEC 17020, Clause 12.3)

- 12.1 Inspection records and survey reports including all relevant supporting data should be retained for a minimum of six years.

13 INSPECTION REPORTS AND CERTIFICATES (ISO/IEC 17020, Clause 13.1, 13.2 and 13.3)

- 13.1 Certain specific information that should be included in the final inspection report is given in HSG 264 and IAF/ILAC-A4:2004 Guidance.
- 13.2 Issued survey reports shall be authorised by the lead surveyor who undertook the survey.

14 SUBCONTRACTING (ISO/IEC 17020, Clause 14.2)

- 14.1 Where an inspection body subcontracts sampling, the subcontractor shall hold UKAS accreditation to ISO/IEC 17025 or ISO/IEC 17020 for sampling of asbestos. Where an inspection body subcontracts asbestos surveying activities, the subcontractor shall hold UKAS accreditation to ISO/IEC 17020 for asbestos surveying in premises. Where an inspection body subcontracts analysis of samples the subcontractor shall hold UKAS accreditation to ISO/IEC 17025 for the appropriate testing activities.

15 COMPLAINTS AND APPEALS (ISO/IEC 17020, Clause 15.2)

- 15.1 The requirement for appeals procedures does not apply for the scope of inspection covered in this document.

16 CO-OPERATION (ISO/IEC 17020, Clause 16)

- 16.1 Participation in the appropriate activities of organisations such as professional bodies, trade associations, or smaller ad-hoc groups could demonstrate compliance with the requirements for co-operation.

REFERENCES

- 1 ISO/IEC 17020:1998, General Criteria for the Operation of Various Types of Bodies Performing Inspection.
- 2 IAF/ILAC-A4:2004 Guidance on the Application of ISO/IEC 17020.
- 3 The Control of Asbestos Regulations 2006 (ISBN 0110751914); HMSO Books.
- 4 HSG 264, Asbestos: The Survey Guide (ISBN 978 0 7176 6385 9).
- 5 LAB 30, Application of ISO/IEC 17025 for Asbestos Sampling and Testing.
- 6 ISO/IEC 17025:2005, General Requirements for the Competence of Testing and Calibration Laboratories.
- 7 HSG 248 - Asbestos: The analysts' guide for sampling, analysis and clearance procedures (ISBN 0-7176-2875-2) .
- 8 L143 Approved Code of Practice CAR 2006 - Work with materials containing asbestos (ISBN 0- 7176- 6206- 3).
- 9 L127 Approved Code of Practice The Management Of Asbestos in Non-domestic Premises, (ISBN 0 7176 6209 8).
- 10 British Occupational Hygiene Society (www.bohs.org.uk)

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