



## **17<sup>th</sup> UKAS Asbestos Technical Advisory Committee – Summary**

**Thursday 28<sup>th</sup> August at UKAS  
(Feltham)**

**Issue 2 – Replacing Issue 1 dated December 2014 following 18<sup>th</sup> TAC Meeting**

### **Minor change to HSE Update (4):**

- **Pg. 4, 'HSE Inspection Programme', Third bullet point: 'Analysts are chosen on the day of visit'**

### **Minor change to Survey Reporting (5)**

- **Pg. 5, 'Access Restrictions': 'Surveyor needs to state that full survey cannot be done and that the final report is of limited value:'**

#### **Attendees:**

Wendy Smith, UKAS (WS – Chair (stand –in))

George Sanders, UKAS (GS – Secretary)

Helen Ratcliffe, Health & Safety Executive, Asbestos Policy Unit (HR)

Martin Gibson, Health & Safety Executive, HM Principal Specialist Inspector (MG)

Laurie Davies – Health & Safety Laboratory/ Independent technical assessor (LSTD)

Colette Willoughby, British Occupational Hygiene Society (BOHS)/Independent  
Technical Assessor (CW)

Rob Blackburn – Asbestos Removal Contractors Association (RB - ARCA)

Arran Cobley – Hampshire County Council (AC)

#### **Apologies:**

Garry Burdett - Health & Safety Laboratory (GB - HSL)

Jonathon Francis - Representing Asbestos Testing and Consultancy (JF - ATaC)

Craig Bell - Health & Safety Executive (CB - HSE)

Sue Burbeck – Adams Environmental Ltd (SB - Chair)

John Richards – Royal Institution of Chartered Surveyors (JR - RICS)

#### **Guest Speaker:**

Paul Johnson – BOHS (PJ - Head of Qualifications)

### **1 Welcome/Apologies**

Paul Johnson – BOHS, joined to aid discussion point under Item 7 only

### **2 Minutes of 16<sup>th</sup> Meeting**

Minutes agreed

Redacted minutes to be published shortly

### **3 UKAS Update**

Summary:

#### **Company Wide:**

The publication of ILAC P15 which is used in conjunction with ISO/IEC17020:2012 and the withdrawal of ILAC A4 (UKAS bulletin dated 10/7/14 on the website relates to this announcement)



#### Industrial Chemistry, Asbestos and Forensics (ICAF) Section Resource

2 new AMs recruited since the last meeting, one of which will be undertaking Lead Assessor role for some asbestos assessment. The section head count is now at 18

#### Technical resource

Since the last meeting 3 trainee TAs have been undergoing monitoring and evaluation in the role of Technical Assessor (1 is for surveying only, the other 2 are both survey and testing). 1 has completed all training and is authorised and another is expected to complete training and authorisation over the next couple of weeks. This will be monitored closely over the months leading up to calendar year end as another TA may be required. Rob Jackson (IB only) retired from UKAS work last month. We currently have: 9 TAs for test and IB (plus 1 trainee), 2 for IB only (plus one trainee) and 1 TA for test only

#### TA mentoring programme

2 monitoring's completed and another planned for 2014 – awaiting report from mentor

#### Responsibilities

There are no changes, WS remains ACM, GS remains Asbestos TFP, MW as TA mentor, RJB as Divisional Technical Director

#### Accredited Organisations

171 asbestos test laboratories, 159 asbestos inspection bodies

#### ISO/IEC17020 transitions

149 to be completed before Feb end 2015, 62 are still to transition (there have been some resignations since the monitoring of this commenced in 2013)

#### Applications / Resignations / Grant

5 applications since the last meeting (2 test only, 1 test and IB, 2 IB only). 1 resignation from accreditation; several withdrawal of applications. 4 new grants of accreditation since the last meeting - all of them asbestos IB.

Following the previous meeting the Terms of Reference for the Asbestos TAC have been updated and to be authorised.

Timeline for course/qualification acceptance in draft and to be discussed between HSE and UKAS.

## **4 HSE Update**

HSE will shortly have a new Chief Executive: Richard Judge who comes to the position with a Chartered Engineering background

Steering Committee has been set-up to investigate a route for more commercialism through the HSE. Possible options include; commercial advice; inspection service for mature H&S Management Systems, which HSE charge for.



There is a rolling programme of looking at asbestos publications to reduce duplication and simplification. Documents being aimed to specific markets within the industry with the possibility of different versions to accommodate accordingly

HSE to review HSG247, Asbestos: The licensed contractors' guide. The Asbestos Liaison Group (ALG: <http://www.hse.gov.uk/aboutus/meetings/committees/alg/>) is assisting The Policy Unit to update this document.

### Campaigns

Confirmed that an asbestos campaign is to start 25<sup>th</sup> September/early October.

This will not be a 'Hidden Killer' campaign and is based on Insight research with behavioural considerations conducted outside of the HSE.

The HSE is implementing its first 'app' for smart phones in this campaign, called: 'Beware Asbestos App'. This will be staying after the Campaign (expected to last around 6 months). 'App' will have a trimmed down version of what is required. It is hoped that this will reach the Trades personnel (who are at risk) in a more effective way.

Additionally, pictorial information of where to find asbestos containing materials (acms) and a kit including a Type 5 coverall (no RPE) will be available. A number of stakeholders are involved including: Small Business Trade Association, and; IOSH electrical contractors

### Occupational Health:

- Much bigger profile now and particularly in the Construction sector
- Consultation period recently on proposals (CD273) to exempt self-employed persons from section 3(2) of the Health and Safety at Work etc. Act 1974, except those undertaking activities on a prescribed list, (which was requested by Ministers) will be subject of course to parliamentary scrutiny. Helen's unit has raised the issue of potential gaps in that list.
- Theoretically, supply of older articles with asbestos has not been permitted since 2009, e.g. Train carriages and museum items. HSE has been awaiting reinstatement of its previous powers and is now able to begin issuing certificates of exemption, e.g. to museums to allow transactions of artefacts to occur as required
- Chief Scientist has been considering the continuing inclusion of white asbestos within CAR, specifically asbestos cement. However as per previous two individuals acting in the role of Chief Scientist Regulation controls on white cement were appropriate and to remain accordingly

### HSE Inspection programme

As confirmed at the last meeting in March the 4SC Inspection campaign is ongoing with on-site and HO visits. Report to be produced by the end of this financial year.



Some queries were raised by the Committee and the following points were clarified:-

- Practicalities of unannounced site visits not possible: HO visits are planned (not unannounced)
- As part of the visits all aspects of 4SC work including; management, training and work completed over a period of time on a single analyst to be reviewed, with analyst reports and slides being taken away to support the review process
- A number of variables are being incorporated into the selection of Labs and analysts respectively, including; geographical spread and known issues. Analysts are chosen on the day of visit.

#### Regulations/Approved Code of Practice (ACoP)

Revised ACoP not yet published in hard copy due to guidance affected by research being finalised, (ventilation and negative pressure).

## 5 **Survey Reporting**

### Quality of survey inspection reports

The quality of survey reports has been a concern for some time and evidence from the review of reports for BOHS examination purposes confirmed that they are generally computer generated with little input from the surveyor: Containing little data associated with reasons for the survey and extent of survey for example. Many come from accredited bodies and generally all are of poor quality on first submission.

Further inaccuracies exist, such as:

- A survey report being titled as R&D but detail within stated refurbishment only.
- Detail in Exec Summary with a huge table on access limitations, although scoping document states that access was required

Indicates poor planning on substantial surveys: Surmise many are done as desk-top reviews only.

When reports are rejected they will be modified and then re-submitted for further examination review. This process allows for the same report to be marked/examined up to three times and typically it will take up to the third submission before the report is actually acceptable. Reissued reports are often only produced for examination purposes and will contain modifications which the organisation's report format doesn't normally include

### **Reporting Issues -**

#### Contract Review:

The average survey report is not understood by newcomers to the industry. HSG264 states that it should be easily understood. Issue of missing detail could be explained if surveyor is new, but use of templates tends to provide much detail of no consequence and only small amounts of useful data. Surveyors will concentrate on the survey work with little thought to how they relate to the customer/end user. Although Refurbishment or Demolition surveys tend to be satisfactory if they 'sit' on top of a management survey the



Committee consider the aspect of contract review to be inadequately implemented.

#### Access Restrictions:

Surveyor needs to state that full survey cannot be done and that the final report is of limited value: Usually client will require as much to be done as possible within constraints of operations. However contract review process is ultimately not being completed as required. A statement at the beginning of the report is required, to be clear why not done.

#### Exclusions:

In addition to accessibility 'possible debris' is cited, but legally need to include debris. Further exclusions are written into reports but reference to previous exclusions agreed prior to work(s) being undertaken also need to be included.

#### Omissions:

Sampling strategy described as following HGS264, but strategy is surveyor dependent and varies between survey companies. Examples of number of samples being stipulated within contract review were cited by members. It's agreed that this potentially limits professional judgement of the surveyor. Sampling strategy good in guidance documents and wouldn't expect clients to determine the sampling required.

Members suggested whether an example of a survey template should go in Guidance? Anecdotal evidence would suggest that there is a demand for this. However current Guidance is considered satisfactory, it's the interpretation of the Guidance, along with time on-site for surveyor(s), which can add pressures and affect the approach taken.

#### Assessment by UKAS

UKAS confirmed that UKAS assessors are expected to raise improvement actions, if statements in survey reports were not easy to understand and clear.

The number of survey reports reviewed on assessment varies: To be selected by the assessor. Report templates are requested from customers via the PAAD form and are to be reviewed by Technical Assessors prior to assessment. UKAS to review and discuss this again to ensure focus on this area of the accreditation standard.

The process for continuous improvement was limited to an organisation at present. UKAS will investigate the possibility of reviewing the number of findings raised against reporting in past assessments for the sector Acknowledged that findings may relate to the actual report under review and/or a more fundamental approach to be taken by an organisation

#### Assessment by HSE

The numbers of survey reports seen each year by HSE staff is random. Process for continual improvement needs to be further discussed.



Suggested that specified reporting guidance is made available to clients who request surveys. The HSE confirmed that this had been taken forward internally for review

## 6 **ATaC Update** – Summary/update provided following meeting

### Key points (2014):-

- Asbestos Surveying: 48 candidates – surveying failures around 10%
- Asbestos air monitoring: 33 candidates – with failures around 30%
- Duty Holders course – 5 candidates

## 7 **BOHS Update**

### **Proposed amendments to the asbestos modules:**

BOHS introduced the proposed plans for the asbestos modules. These were discussed by members and feedback given to BOHS, further feedback will be passed to BOHS in the coming weeks. Note there is no planned change to the educational standards, as described in the syllabuses, and the level of attainment required by candidates will not change.

### **General BOHS Update:**

#### Key Points:

- Reporting Issue:

P402 being split as of 1<sup>st</sup> September 2014. Decision was made for a number of reasons:-

- Increasingly, surveyors are no longer responsible for writing reports
- Reports continue to be of a poor quality
- A new approach is needed to raise the standard of reporting
- Committed to enhance qualification system with turn-around in a more-timely manner: Up to 12 months for getting qualification when submission of report was required.

Currently the P405 Management course looks at using survey reports more than what to expect. Reports need to be fit for client and not just style and quality. However, noted that the P405 is attended by a mix of clients, consultants and/or contractors, (number of candidates is up but split not known). Syllabus contains detail on asbestos removal with remediation aspects. The P407 would be required for clients, but the P405 needs to go with this, (as a pre-requisite). Covering surveying, the P407 deals with how to use report information.

- P402 refresher failure rate dramatically reduced: 0% on Management and 13% on Refurbishment & Demolition. Acknowledged that there is no recourse at present or mechanism to track. Also the number of failures may be due to length of time since original qualification which may lead to failures due to modern day differences
- Figures over last year: pass rate for P Modules is consistent. P401 and P403 practical was around 59%, but now 66% for the P401 and 60% for the P403, so slightly improved
- Results turnaround was discussed and noted that delays can be caused by waiting for practical assessment results





- **Results Turnaround Times January – July 2014**

Timescale	%	Total %
Within 1 week	7	7
Within 2 Weeks	33	40
Within 3 Weeks	31	71
Within 4 weeks	22	93
Within 5 weeks	7	100

**8 Lab 30**

UKAS acknowledged that Lab 30 is currently out for public consultation until 19<sup>th</sup> September.

**9 RG8**

UKAS acknowledged that RG8 (Ed 4) is out for public consultation until 31<sup>st</sup> August.

There was a discussion over the minimum UKAS requirements for reinspections with regard to qualifications and experience. The idea of the P402 (or equivalent) being required for solely 'condition monitoring' along with 6 months experience was suggested by some Members as onerous. However overall the committee felt anything less than this and the issue becomes more subjective and harder to assess when on-site. Also as soon as further inspection(s) is required the need for suitable contract review becomes apparent and transparency in the process is needed. IBs' will have the option to gain accreditation for this activity if so desired: Minimum requirement for the P402/equivalent will be required, until such time that a more suitable qualification is available.

A poll of ARCA's members noted that when questioned, surveying companies would more often than not not take out to site keys to enable access to duct covers etc. Although a requirement of the Guidance it was considered that such access tools would only be required if specified by the customer prior to the work, (regardless of type of survey). Consideration of CI 8.1 of RG8 was given in light of how process was client specified. However given issue of accessibility is discussed at contract review, then statement was considered to be satisfactory.

**10 AOB –**

- i. HSE requested guidance with matrix on visual assessment times to support HSG248 revision. Realistic times needed for Stage 2 concerning typical enclosures types + areas – UKAS aims to provide some information to HSE to support the HSG248 revision
- ii. Technical Assessor observed a recent clearance of a hygiene facility as poorly executed by the analyst. Although suitably attired (PPE/RPE) the process did not reflect expectations for enabling a clearance certificate for the



hygiene unit to leave site. UKAS had stopped the process as the analyst had proceeded to turn the pumps on.

Wider issue has been recently discussed externally and training provision noted as lacking with regard to adequate visual inspection and dust disturbance.

Next Meeting: 11<sup>th</sup> February, 2015 is planned

Venue: UKAS, Feltham