

UKAS Transition Strategy for Evaluation and Recognition of HSG248 'Asbestos: The Analysts' Guide'

Transition – Recap

In recognising HSG248 Second Edition for accreditation purposes, a few risks have been ascertained in the proffered changes, which are considered to be too high to accept solely on the grounds of a self-declaration by those CABs affected. However, it is recognised that a full assessment, although more comprehensive and undertaken as part of scheduled activities, would take too long.

The following is therefore considered to be a more blended approach. Designed to provide sufficient flexibility to give the required confidence that:

- UKAS accredited Conformity Assessment Bodies (CABs) continue to uphold the technical requirements associated with the First Edition, whilst working towards the revisions as detailed in the second edition of HSG 248,
- All CABs may transition at the same time, thereby promoting an even commercial playing field.

Transition – Overview

As detailed during the UKAS/HSE webinar in May, the process of transition will be conducted outwith the scheduled assessment process. In essence this will be a remote activity with Laboratories providing a self-declaration⁺; the '+' referring to supporting evidence. Split into defined timelines/'windows', (see separate Doc T) this is intended to provide a defined benchmark towards all laboratories, whilst expediting the process for recognition purposes.

Laboratories can verify that the following aspects have been upheld where relevant:

- Training and Competence
- Review of Requests, Tenders and Contracts
- Methodology of sample/test activities
- Handling of test items
- Technical records
- Ensuring the validity of results
- Reporting
- Management system documentation

Self-Declaration would be a suitable means to satisfy the majority of these. Based on key changes UKAS assessors need to check laboratory compliance, with policy and procedure/process being updated as and where required and implemented.

However, to support verification of those medium/high risk aspects and until such time when a scheduled assessment is conducted, the Laboratory, in addition to the self-declaration, is required to submit evidence in support of the action it takes. This will enable UKAS to have confidence that the changes/new requirements as documented in HSG 248, ([Second Edition - Amended July 2021](#)), 'Asbestos: The Analysts' Guide', have not only been revised, but have been implemented as required.

The effectiveness of implementation will be subject to subsequent laboratory internal audit(s) but also assessed at the next scheduled assessment in 2022 (February onwards).

Transition – Detailed Process

- i. Laboratories to download Declaration, Doc D* (as linked on this webpage via separate placeholder)
 - ii. Laboratories to review and complete Doc D between now (August) and 30th November. Completion will involve:
 - a. A gap analysis of HSG 248 Second Edition, to support existing management system documentation and applied technical methodologies
 - b. Provide supporting evidence of implementation - clearly labelled, identifying what has been provided and its location within the record(s) provided
 - c. Either embed** evidence directly into Doc D or clearly identify from/to Doc D via separate attachment (e.g. within an email)
 - d. Confirmation of all relevant aspects being upheld***
- * Following review post webinar, Doc D is now the amalgamation of Docs A and B respectively that were described previously
- ** Where embedded directly into Doc D, please ensure records are in Microsoft Word format to enable all IT devices to access relevant files
- *** Some labs may already be implementing said changes, however evidence of implementation is still required
- iii. Laboratories to submit completed/signed Declaration with evidence from 1st September to 1st December to UKAS at: [Customer Services](#), detailing in the Email subject header:

X Submission/ 2021 HSG 248 Transition Self Declaration/ Accreditation Schedule number/ Customer name

Where 'X' is the submission Number by Lab e.g. 1st or 2nd

- iv. UKAS will review the Declaration and evidence and:
 - a. Will acknowledge in response as approved, if satisfactory. The CAB's schedule will be updated by the prescribed transition date. Or,
 - b. If submitted and found that the declaration/evidence is either incomplete, insufficient and/or not signed/dated appropriately, the declaration will be returned, with justification on what detail(s) was missing

Any laboratory which misses the 1st December date with their first submission cannot be guaranteed that their accreditation will be updated on the prescribed date for transition, (1st February 2022).

- v. Where necessary the Laboratory will resubmit Doc D (fresh template) clearly identifying it as Submission 2 in the file name and within the check-box in Doc D, (Submission 2) with provided detail on what has been actioned.

It is envisaged that most labs will complete the process within 2 submissions, (second submission may incur additional cost).

Those that do not will be contacted and managed on a case-by-case basis. However, the timeline of the process is such that UKAS will not be able to guarantee transition by the assigned date for those labs that require more than 2 submissions.

Transition – Costs

The cost of HSG248 transition work will be a minimum of 0.5 day of effort (around £475 plus VAT) but this will depend on the size of the organisation and may lead to additional chargeable work being necessary in the case of poor submissions. The majority of customers will be levied 0.5 Day, but this will be determined on a case-by-case basis and communicated to each customer if different to this.

In addition, as this process will be via desk-top review, there will be no T&S component.

Transition – Post 1st February 2022

Whilst acknowledged that the submission of evidence will go some way to demonstrate implementation of the changes, it is accepted that the effectiveness of said implementation will need to be ascertained post transition.

Subsequent scheduled events (in 2022) will therefore aim at changes where relevant to laboratories. The aim will be to not add effort to these subsequent assessments, unless the scope changes, or issues are identified that require an extra assessment to be conducted. Ultimately assessments will be undertaken to ascertain the required degree of confidence in competence and conformity.

It must be stressed that the subsequent assessments post transition, will be assessing the effectiveness of the implemented changes. Any organisation found not having implemented the changes as confirmed in the self-declaration or via the evidence submitted, will face sanctions, which may affect their accredited status.

Transition – Contacts

Transition Queries: George.Sanders@ukas.com

Technical Queries: Louise.Wainwright@ukas.com

General Queries/
Submission of Declaration/Evidence: customerservices@ukas.com

Subject Line detail in email:
Accreditation number/Customer name/HSG 248 Transition

END