



18th UKAS Asbestos Technical Advisory Committee - Summary

**Wednesday 11th February 2015 at UKAS
(Feltham)**

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)
John Richards – RICS (JR - Royal Institution of Chartered Surveyors)
Gerald Hudd – Independent Technical Assessor (GAH)
Steve Platkiw – ATaC (SP)

Apologies:

Garry Burdett - Health & Safety Laboratory (GB)
Craig Bell - Health & Safety Executive (CB)
Sue Burbeck – Chair (SB)

Guest Speaker:

Richard Burton – RSPH (RB - Qualifications)

1 Welcome/Apologies

Richard Burton – RSPH, joined to aid discussion point under Item 5 only.

Need for the committee to consider nominating and agreeing a vice chair.

Gerald Hudd replaces Bob Webster as the TA representative
Steve Platkiw replaces Jon Francis as the ATaC representative

2 Minutes of 17th Meeting

Minutes agreed but HSE noted two minor points for clarification/update in Section 5.

3 UKAS Update

Company Wide:

UKAS is currently in a consultation period with staff with respect to the proposed structure and process amendments proposed for 2015 – 2016. The consultation period ends in March 2015

Industrial Chemistry, Asbestos and Forensics (ICAF) Section Resource

1 AM left in December 2014 and 1 planned exit for April 2015. New starter AM in March and current advert on website (however it's not envisaged this AM will manage asbestos accreditation work) – Section head count is 18 once recruitment completed.



Technical resource

2 further TAs have been authorised for assessing (1 IB only, the other both Test and IB). We currently have: 10 TAs for test and IB, 3 for IB only and 1 TA for test only.

TA mentoring programme

No changes since last meeting

Responsibilities

There are no changes, WS remains ACM, GS remains Asbestos TFP, Mark Wagstaff as TA mentor, Rob Bettinson as Divisional Technical Director

Accredited Organisations

174 test laboratories, 160 inspection bodies

ISO/IEC17020 transitions

All 149 completed before Feb end 2015

Applications / Resignations / Grant

7 new applicant received since the last meeting (mix of test and IB). WS confirmed that extension to scopes (ETS) were separate from the feedback relating to applications and that these were associated mainly with new sites

Lab 30 and RG8 are now reissued

Technical Bulletin is also being revised for a new issue.

UKAS Agreement

All accredited organisations to be reminded of their UKAS Agreement content with specific focus on:

- Significant changes – including relocation (there have been a number of organisations who have relocated and not informed UKAS until after the event, but believe their accreditation remains in place)
- Significant quality incidents – e.g. failure in RICE / AIMS

Accreditation process was reaffirmed;

- A new applicant would not be granted accreditation without all four stages of a 4SC being witnessed
- For existing Labs, the need for all 4 Stages would depend on the individual circumstances of Lab

Unannounced Assessments

UKAS to implement an unannounced visit programme for 2015-2016. Organisations to be randomly selected for a full or partial unannounced assessment. The aim is for this to be zero cost to the customer, assuming the unannounced visit reveals no significant issues. These will be both office and on-site wherever possible, without causing disruption to the Labs. This is a pilot in the short-term, so numbers not



known at present, but process should enable numbers of unannounced visits to be established in the long-term.

All members agreed to progress on Unannounced process.

4SC Failures

4SC failure rate monitoring on UKAS assessments indicates that over half are failing during the process.

Guidance sought on what would indicate a failure. The revised HSG248 may contain a table to indicate examples to address this. Acknowledged that analysts were more than likely to 'fail' a 4SC if being observed by UKAS, so better definition with pass/fail criteria for analysts is observed to be an improvement.

Generally observed that most laboratories still retain a paper based reporting system, therefore the reporting of failures (and at which stage) is not immediately transparent. The Asbestos Technical Bulletin to reflect the need for such data capture going forwards.

4 HSE Update

European Commission (EC) doing a review of H&S. Each member state conducted a detailed evaluation to lead to a possible deregulation proposal.

Some categories of self-employed may be removed from H&S legislation. Always acknowledged that for asbestos, obligations would not change, although the wider issue is still being considered in Parliament.

The Analyst Guide – Public consultation expected in late Spring- early Summer.

Campaigns

Confirmed that the 'Beware' asbestos campaign still ongoing. With use of an app for the smart phone and despite issues associated with simplification process, evidence is that campaign is reaching relevant Trades: useful/good feedback being received.

There is recognition of a need to move to more digital means of communicating requirements.

Occupational Health:

HSL conducting a pilot on maintenance workers exposure, and how to monitor potential exposure.

Confirmed that a few sites have been identified for the HSL to visit – important to capture what person is actually doing on-site

HSE Inspection programme

Confirmed that the 'Analysts' project is ongoing until the end of March. Feedback on all results to be expected at next UKAS asbestos TAC meeting later in the year.



5. RSPH ATaC Qualification proposal

Qualification titled: RSPH Level 4 Certificate in Asbestos Laboratory and Project Management, put forward by ATaC as an equivalent qualification to the current CoCA and to be considered as a suitable alternative

How it works: - Qualification is RSPH Level 4, which is based at 1st year of a degree level – standard being looked for. Evidence from ongoing pilot indicates it is level 4.

Candidates to qualify need to have a suite of P Modules or RSPH equivalent already in place to get on the course.

Approach is based on a combination of classroom based training and coursework over a defined period relating to Laboratory Management and Project Management respectively. Assignments are signed by the candidates and then internally/externally assessed.

RSPH confirmed that the proposed qualification is at Level 4 – designated by Ofqual. Assessment criteria designed so that candidates meet all criteria. If not then candidates don't pass the course.

The course consists of 130 'blended' hours, which ATaC members claim to prefer, as conducted outside of the classroom, so fitting-in with the 'daily routine'.

Term 'blended' is a relatively new phrase aligned to working with distance working as well as being classroom based with a mentor approach. Assigned by the employer. Learning hours go towards a Certificate: to qualify need at least 120 hours.

Confirmed that once attained the qualification equips an individual for the role prescribed, it's not a role of equivalence.

RSPH confirmed that this qualification can match other qualifications in circulation. It was confirmed that BOHS mapped the P modules to Level 4 and CoCA to Level 5 two years ago. RSPH confirmed that similar mapping can be undertaken with this qualification.

Acknowledged that the proposed qualification does not have a 1:1 interview. RSPH/ATaC suggested that an interview after the assignment process could be undertaken.

Described that the breadth/depth of assignments would give confidence that candidates have completed the work as required.

Acknowledged that trained assessors will carry out assessments, who have ATaC qualifications and previously A1 qualified within the industry.

Acknowledged that the course would take a minimum of 20 weeks: Time for assignment completion only (additional to P modules/ATaC RSPH equivalent)



The link to the Ofqual web-site for further information is: <https://www.gov.uk/government/organisations/ofqual>

Ofqual states that RSPH has to comply with conditions as specified by Ofqual via annual statement.

6. **BOHS**

No changes in organisation

Roadshows at the end of 2014 talked about asbestos in soils qualifications but just for awareness at this time.

Pass rates consistent across all P modules – see summary below. Practical assessment process changed recently, but initial feedback indicates that process is satisfactory.

All Training Providers Jul-Dec 2014

Written Exams

Module	No. Cand.	Pass No	Pass %
P401	89	83	93
P402	378	289	76
P402RM		5	
P402RRD		5	
P403	126	93	74
P404	95	75	79
P405	513	439	86
P407		24	

All Training Providers Jul-Dec 2014

Practical Exams

Module	No. Cand.	Pass No	Pass %
P401	112	71	63
P402	346	316	91
3		60	
3		60	
P403	147	96	65
P404	88	83	94
P405	485	434	89
20		83	



2014	2015
L3 Certificate in Asbestos Surveying 2014 Total candidates – 61	L3 Certificate in Asbestos Surveying 2015 Total candidates – 18
L3 Certificate in Asbestos Air Monitoring Analysts 2014 Total candidates -57	L3 Certificate in Asbestos Air Monitoring Analysts 2015 Total candidates - 2
L3 Certificate in Asbestos Project Management 2014 Total candidates -12	L3 Certificate in Asbestos Project Management 2015 Total candidates -
Level 3 Certificate in Asbestos Management for Dutyholders 2014 Total candidates -5	Level 3 Certificate in Asbestos Management for Dutyholders 2015 Total candidates - 2
Level 3 Certificate in Asbestos Bulk Analysis Total candidates 7	Level 3 Certificate in Asbestos Bulk Analysis 2015 Total candidates
Total Candidates 2014= 142	Total Candidates 2015= 22

7. ATaC

8. Survey Reporting

BOHS looking for reports to be submitted for CoCA that are not computer generated.

Agreed to keep reporting on next TAC agenda.

9. AOB –

i. NPL test slide calibration issues

Some Labs only viewing Band 4 after receipt of new slide(s) from supplier.

Not clear what the process of getting slides certified is and whether labs are checking slides upon receipt

Confirmed by HSL that they don't make or package the slides, with limited association with the processing of slides; they are unmarked from manufacturer. HSL use a Master, which has been in use since late 1970s'. ULO send slides to HSL for calibration. No serial numbers are on the slides



ii. EA Blue Book on the Quantification of Asbestos in Soils and future inclusion in Lab 30 document (GS)

Joint Industry Working Group in Soil, Made Ground, Construction and Demolition Materials (JIWG): Steve Forster (Chair) responded on behalf of the Environmental Industries Commission (EIC) and noted that UKAS is unable to signpost to the forthcoming SCA 'Blue Book' Method of Identification and Quantification of Asbestos in Soils and Associated Materials, which is being led by EIC.

As the SCA Committee is currently working through the final draft of this document, with finalisation and publication not far off, UKAS was requested to consider this in time for the publication of Ed 3 of Lab 30.

Confirmed that the requested missed the publication date for Lab 30

An ACoP for the 'Blue Book' method referenced is not being written by HSE.

Acknowledged that as most of the labs who have contributed to the blue book method are also currently accredited, it is likely that these same labs will wish to be accredited to the revised method when published. UKAS will assess accordingly, but agreed that there is no requirement to reference in Lab 30

iii. Clarification on non-enclosed and / or non-licensed Certificates of Reoccupation sought (RB)

Following the minutes from March 2014 being published and a recent Lab query via the ARCA representative, it was perceived that the UKAS response did not reflect the Regulations. Specifically the statement:

"It was added however that for removal work which was not licensable then the HSE had stated that the CoR cannot be issued."

Legal requirement: Reg 17 regarding cleanliness of all work (N-L + Licensed), ACoP states in para 426, where work is licensable4SC required + CoR to be issued.

Para 428 : Clearance not required for Non-licensed work and so 4SC for enclosure work on N-L work not required, but Certificate of Cleanliness needed – self-certification.

Therefore legal requirement is clear.

Therefore although a CoR is not needed for Non-licensed work, this doesn't then preclude an analyst/Lab from going beyond that. However if a client asks for additional works than that required by the Regulations, confusion could result, although acknowledged that the ACoP is a minimum Standard.

Additional measures if requested by clients may be perceived to be condoning 'red-tape' but the Regs don't specifically prohibit it.

Question:

Can a 4SC or CoR be conducted/issued on non-licensed works?



Answer:

Neither is required for non-licensed works by HSE. 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, then Lab has to inform their client that it is not needed via Contract Review, as part of its accredited management system.

Further confirmed that if no enclosure, then no air test is required. If an air test of an unenclosed work area is required/requested by the client, then this should not include any dust disturbance of that work area.

iv. BOHS Certificate unique numbering

Recent UKAS visit highlighted two certificates with the same identifying number on separate P Certs – P403/P404.

BOHS confirmed that they are uniquely identified, containing a date reference, so certs shouldn't have same identifiers.

Next Meeting: 19th August, 2015

Venue: UKAS, Feltham