



RG 8

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Accreditation of Bodies Surveying for Asbestos in Premises

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CHANGES SINCE LAST EDITION

Numerous since the previous edition, changes include reordering of document to reflect changes to the order of ISO/IEC17020:2012 clauses, update to reference documentation, addition of requirements for accreditation of re-inspections of known asbestos and update/clarification on UKAS policy as a result of the publication of ISO/IEC 17070:2012.

1 INTRODUCTION

- 1.1 The purpose of this publication RG 8 is to give guidance on the application of certain clauses of ISO/IEC 17020:2012 - *Conformity assessment – Requirements for the operation of various types of bodies performing inspection*¹. Accredited inspection bodies are required to comply with all the requirements of ISO/IEC 17020:2012.
- 1.2 RG 8 should be read in conjunction with ISO/IEC 17020:2012 and ILAC-P15:06/2014 *Application of ISO/IEC 17020:2012*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 It should be noted that this RG 8 is not intended to give guidance to organisations conducting surveys for asbestos in marine vessels.
- 1.6 Unless stated otherwise, the terms used in this publication are consistent with terms used in CAR, ISO/IEC 17020:2012 and HSE guidance HSG264⁴ *Asbestos: The Survey Guide*.
- 1.7 Accreditation of an inspection body to ISO/IEC 17020:2012 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 17020:2012 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 inspection:
 - (a) Management Survey: to locate and describe, 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 Survey or 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.
 - (c) Reinspections: UKAS considers reinspection of known asbestos, conducted on behalf of the client as part of the “Duty to Manage” defined in the CAR, to be an accredited service of the inspection body. These reinspections should be conducted by a qualified and authorised surveyor in accordance with this RG 8 as review of Material Assessments will be required. Should additional survey and sampling be required during this work, this will become a management survey.

Details of the work scope covered under each type of the above surveys are described in HSG 264. Surveys may combine any and all survey types depending on the needs and plans of the duty holder. For combined surveys the scope of the duty holder's requirements must be clearly described within the report.

- 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”. Inspection bodies should consider the guidance in HSG 227⁵. A *comprehensive guide to Managing Asbestos in Premises, Appendix 3*, 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 and/or 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*⁶ 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*⁷, 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 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 IMPARTIALITY AND INDEPENDENCE (ISO/IEC 17020 Clause 4.1)

- 3.1 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 is given in Appendix A of ISO/IEC 17020.
- 3.2 It is important to ensure the impartiality and independence 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.
- 3.3 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 Appendix A.3(a) of ISO/IEC 17020) within the organisation to ensure adequate segregation of responsibilities and accountabilities through appropriate reporting structures.

Inspection bodies shall document steps taken to identify and address risks to impartiality on an ongoing basis from whatever source, including links to other organisations, its activities and/or its relationships (including personnel).

4 CONFIDENTIALITY (ISO/IEC 17020, Clause 4.2)

- 4.1 Confidentiality agreements shall be legally enforceable – i.e. encompassed within the employees signed Contract of Employment, formally issued Staff Handbook or other signed document.
- 4.2 Where the inspection body utilises the services of “contracted-in” surveyors or outside support services (e.g. IT or HR services, etc.), who may be able to access the records of the inspection body, risks to confidentiality of client data should be considered and suitable agreements included in the contractual arrangements with the support service provider.

5 ADMINISTRATION REQUIREMENTS (ISO/IEC 17020, Clause 5.1)

- 5.1 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 reinspections and priority assessments this will also be reflected in the UKAS accreditation schedule along with the in-house methods used by inspection bodies for performing priority assessments.
- 5.2 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.
- 5.3 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. Larger organisations may choose to set aside specific reserves in lieu of insurance cover. These reserves must be commensurate with the level of cover generally provided through insurance within the asbestos inspection sector.
- 5.4 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.

6 ORGANISATION AND MANAGEMENT (ISO/IEC 17020, Clause 5.2)

- 6.1 The persons who perform supervisory activities of the asbestos surveyors should have the expertise shown in Section 7.2 below.

- 6.2 Monitoring of the performance of surveyors should include on-site witnessing of surveys and reinspections conducted under the “duty to manage”. On-site witnessing of surveys and reinspections should be carried out by suitably trained staff who are technically competent, authorised to conduct on-site witnessing and are sufficiently independent to carry out the witnessed surveys objectively.
- 6.3 The inspection body’s programme for witnessing surveyors should be designed so that a representative sample of surveying activities are covered on a 12 monthly basis 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 survey, refurbishment survey, demolition survey and reinspections), 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 PERSONNEL (ISO/IEC 17020, Clause 6.1)

- 7.1 The inspection body should ensure that all persons undertaking surveys and/or reinspections should have as a minimum the qualifications, experience and knowledge set out in Tables 1 and 2, unless they are working under the direct supervision of appropriately qualified and authorised persons.
- 7.2 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.
- 7.3 Property sectors should be defined by the inspection body and 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.
- 7.4 Changes to authorisations should be dated and a record kept of changes to ensure visibility of authorisation at any given date.

8 FACILITIES AND EQUIPMENT (ISO/IEC 17020, Clause 6.2)

- 8.1 An example of a Survey and a Sampling Equipment Checklist is included in HSG 264.
- 8.2 For accreditation for Management surveys, Refurbishment surveys or 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.

9 SUBCONTRACTING (ISO/IEC 17020, Clause 6.3)

- 9.1 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 accredited asbestos surveying activities, the subcontractor shall hold UKAS accreditation to ISO/IEC 17020 for asbestos surveying in premises and the sub-contractors report shall be issued to the client in its entirety. Where an inspection body subcontracts analysis of samples the subcontractor shall hold UKAS accreditation to ISO/IEC 17025 for the appropriate testing activities.

10 INSPECTION METHODS AND PROCEDURES (ISO/IEC 17020, Clause 7.1)

- 10.1 The general requirements for working with asbestos are specified in the CAR and these are amplified in the *Approved Code of Practice L143*⁸. The methods of surveying, sampling and assessment of asbestos containing materials are described in HSG 264 and HSG 248⁹ *Asbestos: The analysts' guide for sampling, analysis and clearance procedures*.
- 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 safely, 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:
- Shall be a documented second survey conducted by an individual authorised to conduct such quality assurance checks, without prior knowledge of the areas to be re-surveyed to provide an unbiased assessment;
 - Shall include a record of subsequent comparison data of the two surveys, and the significance of discrepancies shall be considered and acted upon where necessary using the organisation's non-conforming work procedure.
- 10.4 Contract review shall be documented and shall include clear evaluation of the scope and limitations of the survey required by the client including a description of any proposed refurbishment works and any changes to scope.
- 10.5 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, the level of intrusion required, additional equipment required and the capability of the inspection body to provide surveying work in that particular sector.
- 10.6 Information obtained from the client, and particularly from third party sources, should be verified during the contract review stage and/or by the surveyor before the survey commences on site. If Priority Risk Assessment is required by the client this data shall also be verified.
- 10.7 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.

- 10.8 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.
- 10.9 Anyone carrying out an asbestos survey has a duty to take responsible care of themselves and others who may be affected by their actions.

11 HANDLING OF INSPECTION SAMPLES AND ITEMS (ISO/IEC 17020, Clause 7.2)

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

12 INSPECTION RECORDS (ISO/IEC 17020, Clause 7.3)

- 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 INSPECTION CERTIFICATES (ISO/IEC 17020, Clause 7.4)

- 13.1 Certain specific information that should be included in the final inspection report is given in HSG 264.
- 13.2 Issued survey reports shall be traceable to the lead surveyor who undertook the survey and signed by a person within the organisation who is authorised to issue reports.
- 13.3 Reissued amended reports should carry a statement within the introduction defining what has changed, and why, together with appropriate version control to identify the amended report.

14 COMPLAINTS AND APPEALS (ISO/IEC 17020, Clause 7.5, 7.6)

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

15 MANAGEMENT SYSTEM REQUIREMENTS (ISO/IEC 17020, Clause 8)

- 15.1 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, HSG 264 and HSG 248

- 15.2 Where the inspection body bases its management system upon the requirements of Option B (ISO/IEC 17020 Clause 8.1.3) it is strongly recommended that certification is through an Accredited Certification Body. If this is not the case, UKAS will not be able to apply the same degree of confidence in the effectiveness of the management system and it is expected that assessment of the management system will require additional effort.
- 15.3 Note that for assessment of inspection bodies adopting Option B for the management system requirements of ISO/IEC17020 for asbestos inspection UKAS will assess consistent fulfilment and implementation of the requirements of ISO/IEC 17020 clauses 8.2 – 8.8 within the certified ISO 9001 system.
- 15.4 The scope of the ISO9001 certification should cover asbestos inspection activities.

Table 1

Qualifications, Experience and Knowledge Requirements for Organisations / individuals

ACTIVITY	QUALIFICATION	ACCREDITATION	STATUTORY REQUIREMENT
A Person carrying out an asbestos survey and/or Reinspection	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 Surveying 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 detailed in table 2	Recommended that the individual works for an organisation accredited as an Inspection Body to ISO/IEC 17020	Not currently a requirement of CAR 2012
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 <ul style="list-style-type: none"> • P402 plus P405 or: • RSPH Level 3 Certificate in Asbestos Surveying plus P405 or: • P402 plus S301/W504 with PLP, or: • CoCA or equivalent qualification (not necessary to hold the CoCA but this is strongly encouraged). 	Recommended accreditation as an Inspection Body to ISO/IEC 17020	Not currently a requirement of CAR 2012
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 Surveying 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	Not currently a requirement of CAR 2012
D Company taking a bulk sample	At least one member of the company must hold P402 or RSPH Level 3 Certificate in Asbestos Surveying plus P405 or CoCA or equivalent qualification (not necessary for full CoCA but this is strongly encouraged).	Recommended accreditation as an Inspection Body to ISO/IEC 17020 or Testing laboratory to ISO/IEC 17025	Not currently a requirement of CAR 2012

Note to Table 1: 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 Inspection	Minimum Qualification	Minimum Experience	Knowledge
Management Survey and/or Reinspection	BOHS Proficiency Certificate in 'Building Surveys & Bulk Sampling for Asbestos' or other more wide ranging qualifications approved by BOHS (See notes below) or RSPH Certificate in Asbestos Surveying	<p>(i)- Six months appropriate experience in surveying for asbestos in buildings, followed by:</p> <p>(ii) New Surveyor - At least five audits of Management surveys for asbestos covering each property sector as defined in Section 7.4 during which competence should be assessed by an authorised technical auditor.</p> <p>(iii) Experienced Surveyor</p> <p>a) For authorisation to undertake all management surveys - at least one audit for each property sector (one domestic, one commercial, one industrial)</p> <p>b) For authorisation to undertake management surveys in one property sector at least two audits of the surveyor inspecting that property type, If authorisation is to be extended to other property sectors, a minimum of one further audit in that property sector is required.</p> <p>(iv) For both (ii) and (iii) above at least 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 Surveys and Demolition Surveys	Same as for Management Survey	<p>(i) Six months appropriate experience in surveying for asbestos in buildings, followed by</p> <p>(ii) New Surveyor - At least five audits of refurbishment surveys or demolition surveys covering each property sector as defined in Section 7.4 during which competence should be assessed by an authorised technical auditor. A spread between refurbishment surveys and demolition surveys is required for authorisation across both survey types.</p> <p>(iii) Experienced Surveyor</p> <p>a) For authorisation to undertake all refurbishment surveys and demolition surveys - at least one audit for each property sector (one domestic, one commercial, one industrial)</p> <p>b) For authorisation to undertake refurbishment surveys and demolition surveys in one property sector at least two audits of the surveyor inspecting that property sector. If authorisation is to be extended to other property types, a minimum of one further audit in that property sector is required.</p> <p>c) A spread between refurbishment surveys and demolition surveys is required for authorisation across both survey types</p> <p>(iv) For both (ii) and (iii) above at least one further audit to be completed within 3 months of authorisation.</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 surveys and Demolition surveys.

Notes to Table 2:

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 RSPH Level 3 Certificate in Asbestos Surveying is offered in collaboration with ATaC and can be gained by successfully completing the written examination and practical assessment.

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

- BOHS Certificate of Competence in Asbestos: *"Certificate of Competence in Asbestos"*, (CoCA): *The BOHS Modules:-*
 - S301 'Asbestos & other Fibres', or:
 - W504 'Assessment and Control of Asbestos' and Personal Learning Plan (PLP)', or:
 - P401 to P405 inclusive.

Then these 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)

- 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.

REFERENCES

- 1 ISO/IEC 17020:2012, Conformity assessment – Requirements for the operation of various types of bodies performing inspection.
- 2 ILAC-P15:06/2014. Application of ISO/IEC 17020:2012 for the Accreditation of Inspection Bodies.
- 3 The Control of Asbestos Regulations 2012 (ISBN 978 0 11 152108 3); HMSO Books.
- 4 HSG 264, Asbestos: The Survey Guide 2012 (ISBN 978 0 7176 6502 0).
- 5 HSG 227, A comprehensive guide to Managing Asbestos in premises (ISBN 978 0 7176 2381 5).
- 6 LAB 30, Application of ISO/IEC 17025 for Asbestos Sampling and Testing.
- 7 ISO/IEC 17025:2005, General Requirements for the Competence of Testing and Calibration Laboratories.
- 8 L143 Approved Code of Practice CAR 2012 - Managing and Working with Asbestos (ISBN 978 0 7176 6618 8).
- 9 HSG 248 - Asbestos: The analysts' guide for sampling, analysis and clearance procedures (ISBN 0 7176 2875 2).
- 10 British Occupational Hygiene Society (www.bohs.org)

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