

**P407 Advanced Proficiency Module**

**Managing Asbestos in  
Buildings, the Duty Holder  
Requirements**

**Report requirements**

Issue 1.1 | May 2018

## P407 Report submission process

In order to be awarded the P407 qualification, candidates are required to submit a written report to BOHS. The submitted report should demonstrate that the candidate can critically apply their knowledge to improve the management of asbestos in their premises.

Candidates can choose to complete and submit one of the following types of report:

- Option 1: Writing an asbestos management plan for a premises.
- Option 2: Critical review of an existing asbestos management plan.
- Option 3: Investigation report for an asbestos-related incident.

The report must cover work which has been undertaken within three months of the date of submission, and must not have previously been submitted for examination purposes. Where it is not practicable to submit a report that is less than three months old, some variance may be allowed by notifying the BOHS offices in writing.

### Authorship requirements

The submitted report must be the candidate's own work, which should be certified by completing a Certificate of Authorship form. Please note that reports received without a completed Certificate of Authorship form will **not** be accepted for marking.

Only one asbestos management plan per employer can be accepted; therefore a second candidate from the same employer would be required to submit one of the other types of document listed above.

### Report content

When writing the report, candidates should check their work against the **P407 Report requirements** on pages 5-14 of this document. This directly relates to the criteria that the report marker will mark against for each report, so it is important that you include all sections relevant to your report. It also includes a list of common errors for each type of report.

In general, all reports should include the following sections:

- The aims and objectives of the task being carried out.
- A unique number by which the report can be identified.
- Numbered pages.
- The author's signature and date of report submission.

The report must also correspond to the requirements of HSE publications *HSG227: A comprehensive guide to managing asbestos in premises* and *L143: Managing and working with asbestos*.

There is no restriction on the minimum or maximum length of the report. For the purpose of confidentiality, reports may be edited to blank out the name of the company/organisation

commissioning the report. However, the report and the Certificate of Authorship must give the full address of the premises where the task was carried out. All such details will be maintained within the strictest confidence.

Where reference is made in the report to legislation, approved codes of practice or other guidance, this must be current and not refer to any out-of-date documentation.

### **How to submit the report**

Candidates must submit their first report to BOHS within **three months** of the date they sat the P407 Written Theory examination, to ensure that learning has not diminished. The assessment is a highly technical document to write; therefore candidates are encouraged to start the report as soon as possible to ensure they have the maximum time available to complete it.

Part 1 - Certificate of Authorship section in the Report Submission Form must also be completed and submitted alongside the report. This can be downloaded from the BOHS website at: <http://www.bohs.org/qualifications-training/bohs-qualifications/asbestos-qualifications>, underneath the P407 header. Please ensure you select the correct report submission form for the type of report you are submitting.

The Certificate of Authorship form certifies that the report is the candidate's own work, and written by them alone. Any reports submitted without a Report Submission Form will be automatically rejected.

All documents relating to a report (including the Report Submission Form) must be saved and submitted as **one document**, for ease of submission and marking. If your report is split into separate files, it will not be accepted for marking. The file should be saved with an acceptable file name, with the candidate's name, report title and submission date, as shown below:

- **Bob Smith P407 Asbestos Management Plan for Downend School 01.05.2018**

Candidates can submit their reports through one of the following options:

- **Option 1:** For files **less than 10MB** in size, email directly to [asbestosreports@bohs.org](mailto:asbestosreports@bohs.org)
- **Option 2:** For files **more than 10MB** in size, request a Dropbox link by emailing [asbestosreports@bohs.org](mailto:asbestosreports@bohs.org)
- **Option 3:** For printed documents, post to **Reports Section, BOHS, 5/6 Melbourne Business Court, Millennium Way, Derby DE24 8LZ**

BOHS cannot accept liability for non-receipt of posted reports, so we recommend that posted reports are sent by recorded/special delivery or via a courier service

### **Marking, results and re-submissions**

BOHS will contact the candidate within two weeks of the report submission date, to confirm receipt of the report and an anticipated time estimate for marking. After it has been processed, candidates will receive their result in writing from BOHS. The result is given as a pass or fail.

If a report has not passed, Part 2 of the Report Submission Form will be completed by the report marker and returned to the candidate with feedback and further information required. A report will generally be rejected when it contains misleading or inconsistent information, or there is information missing. Candidates will then have **one month** to amend the report and re-submit to BOHS.

For re-submissions, candidates should fill in the column next to the marker's feedback on the Report Submission Form, to outline which sections they have changed in their report and what the changes are. The marker will then review the report to decide if it is now complete. If it is still incomplete, the marker will provide further feedback on the Report Submission Form.

Due to the high knowledge level required for writing these types of reports, it is normal for candidates to correct and re-submit their report at least once before they pass the qualification. If candidates do not understand the feedback given, or require further guidance on report writing, they should contact their training provider in the first instance for advice.

### **Timescale for completion**

The report must be successfully completed (i.e. passed) within 12 months of the Written Theory examination date. Candidates who do not pass within 12 months will be required to provide evidence of steps taken to improve their knowledge and report, such as one-to-one tuition with their training provider. Candidates who do not provide this evidence will be required to re-take the whole qualification.

### **Misleading documentation and plagiarism**

BOHS has the right to refuse to accept reports where misleading documentation or plagiarism has been submitted. This includes using unacknowledged text or prepared material from the Internet and other sources. Where there is evidence that a candidate has fraudulently submitted a report or documentation, BOHS may bar any further submissions from that candidate.

If evidence of plagiarism or the submission of misleading documents is found after the award of a Proficiency certificate, BOHS has the right to withdraw the qualification. Candidates may appeal in writing against report rejections or certificate withdrawal through the general appeals procedure.

### **Time extensions**

Time extensions for report submissions will be considered in exceptional circumstances, such as:

- Serious illness.
- Severe disability.
- Involuntary unemployment.
- Employment restrictions.

Candidates should submit a request in writing in order to be considered for a time extension,

outlining the reasons they require more time. In the cases of illness or disability, a brief description of the illness/disability and an estimate of the expected duration (if known) should be included. In the case of involuntary unemployment, an indication of the expected duration of the unemployment should be included. All requests will be treated in the strictest confidence.

Where working restrictions are imposed (e.g. working offshore), we will accept a request for a time extension from your employer or supervisor.

## P407 Report writing requirements

### Option 1: Writing an asbestos management plan

#### Overview

It is expected that any asbestos management plan submitted for the purpose of this qualification will be for an organisation, and not just for a single building managed by that organisation. It is perfectly acceptable to submit an asbestos management plan where the organisation only owns or operates a single premise, but it is also important to remember that the management plan must detail how the organisation **generally** manages asbestos, and therefore should be applicable to any other premises subsequently owned or operated by the organisation.

The entire report should be **clear and unambiguous**. It should be possible for anyone outside of the organisation to understand how they manage their asbestos.

#### Content of the report

The report should include the items detailed below:

##### Introduction

The introduction to the report should include:

- A **title page** that clearly states that the report is an asbestos management plan, and which organisation/premises it is for.
- An **introduction** which details when the management plan was produced, the latest revision date and who the author is.

##### Aims of the asbestos management plan

At the beginning of the report, there should be a description of what the plan is trying to achieve (sometimes referred to as an asbestos policy). This should include the overall aims of the organisation, and how these aims are going to be achieved.

##### Job titles, roles and responsibilities of persons who manage asbestos

The Control of Asbestos Regulations 2012 states that the duty holder has the responsibility to manage asbestos within any non-domestic property that the organisation owns or occupies. This is detailed fully within Regulation 4 (1).

As such, the management plan should identify who the duty holder is for the organisation and what their specific responsibilities are. There may be instances where an organisation has more than one duty holder, and as such each of these roles should be defined in the same manner as well as the interaction between them.

In addition to the duty holder, most organisations will have other employees who have key roles in the management of asbestos, even though their specific job title might not suggest so. For example, a Project Manager will engage contractors to carry out work within a

building, and as such they will be required to undertake actions within the management plan in order to suitably manage asbestos. Those involved in the procurement of contractors may be separate to the individuals who manage the works, but they too have responsibilities.

All of these individuals should be identified and their duty with regards to asbestos should be detailed within the management plan, as well as the lines of communication and responsibility.

### **Regular monitoring and reviews of the management plan**

There must be a procedure in place to ensure that the management plan is reviewed in line with Regulation 4 (10) of the Control of Asbestos Regulations 2012. Details should be provided of how this review will be undertaken and the outcome. This should also include a timetable for annual reviews.

### **Locations and conditions of ACMs**

The management plan needs to detail how the location and condition of any known or presumed asbestos-containing materials (ACMs) are recorded. This should detail what happens to the information that is recorded once an asbestos survey has been undertaken, and other appropriate information such as inaccessible areas and presumptions.

### **Priority assessments**

Each survey report will include a material assessment for all asbestos sampled or presumed. However, the overall risk rating for the material is calculated by adding a priority assessment to the material assessment. The calculation for the material assessment is documented within *HSG264 Asbestos: The Survey Guide*.

Priority assessments are not as prescriptive, although there is an example contained within *HSG227: A comprehensive guide to managing asbestos in premises*. It is the responsibility of the organisation to determine how they undertake their priority assessments, and this should be detailed within the plan. This would also include who carries out the assessments, and how they carry them out.

### **‘Table of priority’ and timetable for action**

Within the plan there should be included a ‘table of priority for action’ and an associated ‘timetable for action’. These two pieces of information can be combined into a single document or table. It should be stressed that this is not a replication of the asbestos register; this should focus on areas of weakness that have been identified within the plan from a review, audit or gap analysis. It may also include items designed to give assurance that the management plan is effective.

The ‘table of priority for action’ must be specific to the management plan submitted and should not be generic. It should include items such as:

- A review of the training supplied to in-house staff.
- A review of documented procedures, quality assurance checks on the work undertaken by analytical companies and asbestos removal companies.
- A review of planned refurbishment work and if the procedure detailed within the management plan was followed.

Please note that these are only examples, and are not expected to be the only items included within the submitted management plan.

### **Management options**

Appendix 5 of *HSG227: A comprehensive guide to managing asbestos in premises* gives a list of management activities for known asbestos-containing materials. The submitted management plan is expected to include these options and set out the basic principles as to when each option would be used. Additional narrative may also be included to explain where deviation from the plan may be acceptable, as having a prescriptive method of management may not suit all conditions.

### **Monitoring arrangements**

Regulation 4 (9) of the Control of Asbestos Regulations 2012 requires that any known or suspected asbestos-containing materials are inspected on a regular basis. The management plan should define:

- How this is undertaken.
- Who undertakes the inspections.
- How the period is determined.
- What would trigger an earlier re-inspection.
- What happens to the information following the re-inspection.

### **Job titles and responsibilities of all employees involved**

As detailed within the earlier section of this guidance, all employees must co-operate with the duty holder to enable them to comply with the requirements of the Control of Asbestos Regulations 2012. In order to achieve this, the management plan should identify all job roles that could impact upon the duty holder and specify what their responsibilities are. For example, there could be a statement to the effect that all employees have a responsibility to report to the relevant person any suspected damage to a known or presumed asbestos-containing material.

### **Training arrangements for employees and contractors**

Regulation 10 of the Control of Asbestos Regulations 2012 defines the different types of training that would be expected to be delivered to individuals, dependent upon the requirements of their job role. Based upon training needs analysis the organisation should detail what training they would give to their employees. There may be instances where the organisation wishes to go over and above the requirement of this regulation. While this is perfectly acceptable, details of the training package and who it would be delivered to still needs to be specified within the plan.

The training requirements for contractors undertaking work on site should also be included. This would normally only be relevant for non-asbestos contractors as they would be dealt with separately, although should the organisation wish to detail it this would also be acceptable.

### **Mechanism for communicating information about ACMs**

Within the management plan there must be details of how information with regards to the location and condition of asbestos-containing materials is passed on to those who need to



know. This would include reference to the different types of surveys and when they would be used, where the asbestos register is held and how the organisation's employees and any relevant contractors can access it.

### **How work on the fabric of any buildings or services will be controlled**

The plan should include details on how any work that disturbs the fabric of any building or services be controlled, and how this is planned with regards to asbestos-containing materials. This should also cover who will be appointed for asbestos remediation work, including:

- How contractors will be selected to undertake asbestos removal/repair work.
- How consultants/laboratories will be selected for undertaking asbestos surveys, asbestos testing and air monitoring, including four-stage clearance testing.

### **Common errors**

**✗ The report does not clearly identify the lines of responsibilities with each person having a defined role.**

What is required is a managerial organisation chart that shows the link from the duty holder through to the lower levels of management staff. This is often not supplied.

**✗ The report does not include a table for priority for action**

Most candidates either don't supply this or just include the survey recommendations.

Examples of what could be included are:

- A review of the training supplied to in-house staff.
- A review of documented procedures, quality assurance checks on the work undertaken by analytical companies and asbestos removal companies
- A review of planned refurbishment work to audit the procedure detailed within the management plan.

Each table should be relevant to the organisation's management plan and it wouldn't be expected that these example are the only ones.

**✗ The report does not identify how contractors will be selected to undertake asbestos removal/repair work**

Most candidates use the fact that the contractor has a license issued to them from the HSE as proof that they are competent. Others will state that their procurement department have sourced them through a framework. However, neither of these will test the contractor's competence.

There needs to be some information included that will confirm the contractor's competence, such as:

- References from similar organisations.
- A sample method statement for some work that may be undertaken on site.
- An interview/presentation given by the contractor at tender stage.

Similar criteria can be used for the selection of analytical firms as the possession of UKAS accreditation doesn't guarantee competence.

A good working example of an asbestos management plan can be downloaded from the HSE website: <http://www.hse.gov.uk/asbestos/assets/docs/managementplan.pdf>

## P407 Report writing requirements

### Option 2: Critical review of an existing asbestos management plan

#### Content of the report

A critical review should be presented as a report. There is no prescribed layout that the report needs to follow, but it would be expected to include the sections below.

#### Introduction

The introduction section of the report should provide information about the critical review. This should include information such as:

- A title page that clearly states that the report is a critical review of an asbestos management plan, and who the review was for (organisation, individual, etc.)
- The name of the person who undertook the review.
- The reason the review was undertaken.
- The date of the review and the final report.
- The date the management plan was last reviewed (if applicable).

#### Main section

The main body of the report needs to examine all the essential elements that are required for an asbestos management plan. This covers all the items listed for Option 1: Writing an asbestos management plan, on pages 5-8 of this document.

However, it is not acceptable to simply state whether each section is compliant or not. Evidence should be discussed within this part of the report that details the conclusion that was reached. The candidate will be expected to detail **why** each element of the management plan reviewed is either compliant or not. Where a section is not compliant, suitable recommendations must be provided as to the improvements required.

#### Conclusion

The report should include a conclusion section; this could be likened to an executive summary or a survey report. This section should include:

- An overview of the management plan that has been reviewed.
- Actions required and when they need to be completed by.
- The mechanisms in place for any recommendations that have been made within the critical review, and how they will be assessed once they have been implemented.

**Common errors:**

**✗ There is a lack of narrative within the critical review.**

Statements will be made throughout the review with no information to back it up, such as: 'this section of the management plan is compliant'.

The candidate needs to explain whether each area of the management plan being reviewed is either compliant or not. They should also explain their reasoning for this.

Where non-conformances are identified, corrective actions should be identified.

## P407 Report writing requirements

### Option 3: Investigation report for an asbestos-related incident

#### Content of the report

There is no prescribed format that this type of report needs to follow, but it should be presented as a full report. The report should be easy to understand, unambiguous, follow a logical sequence and include an introduction, details of the incident plus a conclusion and recommendations. It should include all of the items listed below.

The report is expected to refer to all health and safety legislation relevant to the incident, and not just be limited to asbestos legislation.

#### Introduction

The introduction should include the following sections:

- A title page.
- The date that the report was produced.
- The date of the incident.
- The aims of the investigation.
- Specific details as to where the incident took place.
- Details of all parties that were involved in the incident.
- The process used to investigate the incident.
- The name of the lead investigator.

#### Main section

The main body of the report for the most part will be a factual record of the events leading up to the incident.

It is required that all pertinent information with regards to the planning of the investigation should also be included, so as to provide a complete picture of the incident. It is likely that this investigation will follow a chronological sequence. The information provided within the report must include, but need not be limited to the sections below:

##### ***Location of the incident***

This should be as specific as possible, and may include a location plan that highlights the area(s) involved.

##### ***Details of materials disturbed***

This should include photographic evidence and confirmation that the material disturbed did contain asbestos. Details of how this confirmation was obtained should also be included within the investigation report (e.g. survey register or bulk certificate).

### ***Specifics of the incident***

This section should clearly identify:

- How the incident was detected.
- Who detected the incident.
- The time the incident was detected.

### ***Immediate action/emergency procedures taken following the incident***

The timescale for the implementation of these actions also needs to be detailed. The actions taken should be matched against those described in the relevant asbestos management plan, with evidence provided.

### ***Post-incident assessment of airborne asbestos***

The results of any air monitoring should be included within the report. It is expected that any monitoring carried out should be appropriate to the incident, with an explanation included of why it was necessary.

### ***Identification of exposed personnel***

The investigation report must clearly identify all people who have been, or could have been exposed to the asbestos-containing material. The advice provided to these individuals must also be included.

### ***Contributory factors***

All contributory factors relating to the incident must be fully detailed to ensure that the root cause(s) can be clearly identified.

## **Conclusion**

The conclusion section should include the items below:

### ***Identification of failings***

The conclusion section of the report should identify the failings that occurred to enable the incident to take place. The root cause should be accurately identified and this must be evidenced from the investigation report.

### ***Overview of incident and investigation***

Within this section of the report, there should also be an overview of the incident and the subsequent investigation. The findings of the investigation should be summarised and suitable recommendations made to rectify any failings identified. It should also identify the person(s) who are responsible for carrying out the recommended actions, and the timescale allocated to complete these actions.

There should also be details on the lessons learned by the organisation from this incident, and how the findings of the investigation are shared to ensure that there is no repetition.

### ***Review of asbestos management plan***

Following the completion of the incident investigation, the asbestos management plan should be reviewed. Evidence within this section of the report should show what changes have been made as a result, and the timescale for implementing these changes.

The actions taken throughout the incident should be as per the emergency details described within the organisation's management plan. Where any variance to this is detected within the investigation, it should be highlighted and appropriately resolved.

***Follow-up***

A method should be identified within the report that allows for the lead investigator to be informed as to when the recommendations have been implemented.

**Common errors:**

**X The main error with this type of report is the investigation.**

The candidate tends to focus on the actual incident rather than why it happened.

For example one report marked was an investigation following an operative cutting into a cement waste pipe during the refurbishment of the kitchen.

The route cause identified by the candidate was that the operative didn't read the report correctly. The fact was that the survey provided was a refurbishment survey but for the bathroom and had been commissioned some years previously. The works should never have commenced with this survey but this didn't appear within the initial investigation.

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Information in this Qualification Specification is correct at the time of issue but may be subject to change.

**BOHS**

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