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Asbestos Removal Management Institute

Competency within the Asbestos Removal Industry

This document contains the development work undertaken by the core members of the Asbestos Removal Management Institute (ARMI): the Asbestos Control & Abatement Division (ACAD), Asbestos Removal Contractors Association (ARCA) and the National Federation of Demolition Contractors (NFDC). The Health and Safety Executive (HSE) and its Asbestos Liaison Group (ALG) were fully consulted. HSE endorses this guidance as describing a sensible and appropriate approach to managing training and competency.

This guidance aims to assist licence holders managing health and safety in asbestos work. In particular, it provides a standard industry approach to assessing and maintaining competency at all levels, including direction on how to carry out Training Needs Analysis (TNA) for staff. Following the guidance offers one way to manage training and competency, but licence holders may comply with legal requirements by taking any other equally effective action.

armi GUIDANCE DOCUMENT

Competency within the Asbestos Removal Industry

Introduction

This document provides guidance on how to produce a competency management system and can be applied to all categories of asbestos licence holder (LH).   LHs are legally required to have effective management arrangements in place: this guidance describes a practical approach to managing competency and training that has been designed specifically to meet the needs of the asbestos industry. LHs are free to use alternative, equally effective, management approaches in order to comply with the law.

Asbestos Licence Holders (LHs) often ask 'what is competence and how is it assessed?' Most LHs will already be doing "competency assessment", but probably in an informal and less structured way than described here. Competence is simply the ability to perform a task to a specified standard; competence assessment involves using a range of methods to measure performance against that standard.

Competencies are the skills, abilities, knowledge and behaviours that lead to successful performance. A defined set of competencies, related to performance standards for each role in your business, will demonstrate the standards of work that your organisation expects and values. Competency assessment is continuous and helps to identify training and support needs. For example, further training and support will be needed if:

- There is evidence of complacency or bad practice (behavioural issues);
- When work methods change;
- Where new knowledge or skills are required;
- Where skills decline over time ('skills decay').

> *A competency-based approach benefits both the organisation and the individual's personal development. If carried out correctly it will be key to an organisation's overall capability and will lead to improved customer service and confidence.*

This guidance describes a process of continuous performance management, which can be applied to all types of LH and all employee positions. It will help LHs achieve and maintain compliance with legal requirements and will also help to identify training needs for specific individuals.

Legal Requirements

This ARMI guidance provides a practical system for the effective, on-going management of these issues in a way that meets individual and organisational needs.

The Control of Asbestos Regulations 2012, accompanying Approved Code of Practice and guidance (see below) set out requirements regarding the content, timing and duration of training. In practice, a competency-based assessment process can be one way of demonstrating "effective management arrangements" and identifying training needs.

These legal duties are an employers' responsibility and cannot be delegated. Employers can nominate others to do all or part of the work to assist them in complying with some or all of their duties.

- **The Management of Health and Safety at Work Regulations 1999**
    - Regulation 5 requires employers to make appropriate arrangements "for effective planning, organisation, control, monitoring & review of preventive and protective measures" and put them into practice. Effective management arrangements are a fundamental requirement for all LHs, encompassing

all other aspects of health and safety (including training and competency assessment). The law does not specify any one particular way of achieving "effective" arrangements. ARMI considers that a competency-based approach to employing, supporting and monitoring staff will be central for effective management and that the six-step process described here addresses the essential elements. This guidance describes one way of approaching the subject, but LHs can comply with legal requirements by adopting any other equally effective approaches.

■ **Control of Asbestos Regulations 2012**

◆ Regulation 10 requires employers to ensure that anyone liable to disturb asbestos during their work, or who supervises such employees, receives the correct level of information, instruction and training to enable them to carry out their work safely and competently, without risk to themselves or others.

◆ Regulation 18 requires that every employer must ensure that only competent employees enter a respirator zone; and that adequate supervision is provided for any employees who enter a respirator zone. A competent employee means an employee who has received adequate information, instruction and training.

■ **The Health and Safety at Work etc. Act 1974**

◆ Employers have a general duty to provide information, instruction, training and supervision to those working under their control. The nature of supervision etc required will be strongly influenced by the competence of employees.

Competence does NOT simply mean that the operative / supervisor / manager has a current training certificate.

A competent individual has the experience, training, skills and expertise appropriate for the job at hand. Training is delivered in accordance with "Training Needs Analysis": this means that the employer assesses an individual's actual performance and provides additional training (where needed) on the basis of that assessment. This will be more difficult to do (and demonstrate to the enforcing authorities) where the licence holder chooses to employ staff on a casual, or temporary basis.

It is very important to remember that 'training' can be provided in many ways and is not only formal, classroom-based presentation. Training means providing information and instruction, leading to new knowledge, new skills and abilities or to changes in behaviour. A line manager verbally coaching and correcting work practices on a live site is a form of training. Training could also include teaching, tool-box talks, discussions and demonstrations.

Overview

This document describes a six-step process. Competency tables form the basis of the approach. Detailed guidance on each step is provided for reference and appendices provide examples of what the process may look like, in practice.

Six steps of the competency cycle

1. Establish the employees' roles and duties. Identify the relevant skills and competencies for the position using the competency tables.

2. Agree performance standards in relation to relevant competency elements and the employees' duties.

3. Collect evidence of the employees' performance and compare with the desired performance standard.

4. Produce Training Needs Analysis (TNA) based on the gaps identified between the employees' performance and the required performance standards.

5. Provide training to close performance gap(s).

6. Carry out on-going assessment to ensure continued competency.

The Competency Tables (see following Tables 1-3) define key elements associated with carrying out asbestos work in compliance with legal requirements and industry guidance. The three Tables address:

1 **core practical removal competencies;**

2 **supervisory roles and;**

3 **management functions.**

The Tables provide a common reference point for industry, although LHs may wish to expand on this in more detail in their own documents and procedures.

Six steps have been described to make the overall process of competency management clear. In practice, the process can be flexible and often informal. Steps 3-5 (get evidence, TNA, train) may often merge together: for example, where a visiting manager observes an operative wearing coveralls incorrectly and immediately advises on correct practice. Similarly, some steps will be repeated less frequently than others: for example, once roles have been identified (step 1) they will only need to be revisited in the event of promotion, company restructuring, or during an annual review etc.

In summary, LHs should match an individual's current role to the topics and competency elements contained in the tables. It is important to refer to the tasks performed by that individual, not their job title. For example, a senior manager in a small company might also act as a supervisor and occasionally an outside man: in this case, topics and competencies from all 3 tables will be relevant. For each competency, the LH and employee should agree the expected performance standards (based on standard procedures, industry guidance, training programmes etc.). The LH then measures performance against those standards on an on-going basis (and when carrying out performance appraisals etc.), identifying any training and support needs that may be appropriate.

Table 1: core practical competencies

Topic	1 - Health effects	2 - PPE & RPE	3 - Setting Up	4 - Controls	5 - Decontamination	6 - Effective teamwork & communication
Outline	Health effects associated with asbestos work are understood.	Personal and respiratory protective equipment is used, stored and maintained correctly.	A safe and secure site enables the asbestos / ancillary work to be carried out in accordance with plan of work.	Techniques ensure that asbestos exposure (and other relevant health and safety risks) is prevented or minimised.	Effective decontamination of people, plant and premises.	Works with others to ensure work is carried out in an appropriate manner.
Elements	1.1. As outline	2.1 RPE worn correctly 2.2 RPE care and maintenance 2.3 PPE worn correctly	3.1 Build simple/small enclosures 3.2 Build large/complex enclosures 3.3 Appropriate siting of H-Class vacs and equipment, waste & transit routes, signage etc 3.4 Ancillary work carried out without disturbing asbestos / negative impact on other control measures.	4.1 Relevant techniques for specific role, eg removing screwed AIB, injecting pipework etc. 4.2 Orderly work practices 4.3 Waste handling	5.1 Demonstrates personal decontamination procedures 5.2 Demonstrates plant decontamination procedures	6.1 Follows the plan of work 6.2 Works constructively with colleagues, management, clients etc. as necessary
Skill / performance level required	Information understood; demonstrated in attitude / application across other competencies.	Demonstrates correct checking, fitting, cleaning and storage routines.	Demonstrates sound enclosure construction and orderly set up.	Demonstrates appropriate use of equipment, materials and techniques; appropriate bagging, handling and storage; ensures work area is clean and tidy.	Demonstrates ability to decontaminate self and equipment.	Follows plan of work & informs line management where risk assessments / plans / procedures differ from site reality; near miss reporting etc.

Performance standards: set out in company procedures, roles & responsibilities, Contractors' Guide, training content, ACoP, industry guidance etc.
Competency evidenced by: one to one discussion, practical demonstration, management observation & appraisal, photographic evidence, qualifications etc.

Table 2: supervisory roles

Topic	1 - Reviewing / confirming plan of work	2 - Implementing the plan	3 - Site organisation & control	4 - Cleaning	5 - Effective teamwork & communication
		Effective site supervision: coordinating & organising work			
Outline	Determine the adequacy of assessments and plans provided for work.	Implement plans of work to ensure appropriate working methods used; safe & healthy site achieved.	Set up and maintain sites in accordance with plan of work; all tests, checks and any supporting documentation are correct and current.	Ensure site and DCU ready for clearance and clearances obtained.	Works with others to ensure project is carried out in an appropriate manner.
Elements	1.1 Assess suitability of plans and assessments against site conditions and client requirements. 1.2 Ensure plan of work is available, correct and current and being followed on site.	2.1 Implement management plans for work. 2.2 Troubleshoot any matters arising	3.1 Site is orderly and clean. 3.2 DCU correctly set up and working. 3.3 Air management (visual / smoke tests; ventilation and NPU measurement; safe NPU discharge; suitable leak test location). 3.4 Relevant personnel and equipment records 3.5 Daily/other checks are completed.	4.1 Ensures relevant ACM removed afarp, site is thoroughly cleaned and is ready for 4SC 4.2 Takes remedial action as necessary to deal with clearance failures/issues.	5.1 Communicates plan of work (and any amendments) to workers. 5.2 Works constructively with others. 5.3 Ensures changes to plan of work are authorised where appropriate and notified to relevant people (in-house / enforcing authority) 5.4 Encourages input from operatives on working methods, procedures and arrangements.
Skill / performance level required	Able to assess site conditions against plan of work and supporting risk assessments, including emergency arrangements. Any necessary amendments are accurate, auditable and within agreed remit / level of responsibility. Works to a suitable and adequate plan of work which reflects client's requirements, site layout, sequence of works, control methods in use.	Implementation of plan is consistent and accurate, working in controlled and safe manner: confirmed by audit, management visits, records etc. Demonstrates initiative to deal with issues as they arise – maintains appropriate standards and control, with appropriate input from management and audit trail as necessary.	Clean, orderly site; demonstrates correct set up (and identifies faults, rectifying as necessary). Ensures site documentation and record keeping is available, correct and current (fit test, medicals, NPU, class H vacs etc). Appropriate daily checks done in timely way and recorded in accordance with management arrangements.	Demonstrates ability to ensure ACMs removed, surfaces cleaned (as far as reasonably practicable) and clearance obtained.	Planned work matches client's expectations; information shared with client on completion. Plan of work clearly communicated to operatives. Works constructively with operatives, management, analysts, other contractors, regulator and clients to ensure control maintained. Informs line management where risk assessments / plans / procedures differ from site reality. Assists management in collection of site performance information & in reviews of general management arrangements.

Performance standards: set out in company procedures, roles & responsibilities, Contractors' Guide, training content, ACoP, industry guidance etc.
Competency evidenced by: one to one discussion, practical demonstration, management observation & appraisal, photographic evidence, qualifications etc.

Table 3: management functions

Topic	1 - Policy, procedures & management arrangements	2 - Directing & supporting work	3 - Monitoring, measuring & review	4 - Leadership & worker involvement
Outline	Clearly described arrangements help the organisation consistently meet legal requirements and good practice.	Site-specific assessments and plans of work minimise risks to health and safety; managers provide adequate resources and administrative support for work, enabling plans to be followed and good practice to be demonstrated.	Actual performance measured against stated policies, procedures, site-specific plans and client feedback, ensuring that work is carried out safely and minimising risks to health.	Genuine leadership and demonstration of active engagement with staff.
Elements	1.1 Clear statement of general policy 1.2 Clear roles and responsibilities 1.3 General procedures are suitable for business activities 1.4 Clear policy for induction, training, and on-going performance appraisals at all levels. 1.5 Clear, measurable targets 1.6 Commitment to routine review	2.1 Site-specific risk assessment 2.2 Suitable and sufficient plan of work 2.3 Accurate notifications 2.4 Resources & Staffing 2.5 Record keeping	3.1 Appropriate monitoring and measuring strategies 3.2 Routine review (job completion) 3.3 Routine review (general management arrangements)	4.1 Lead by example 4.2 Seek feedback 4.3 Effective communications 4.4 Continuous improvement
Skill / performance level required	Arrangements are appropriate for the size and complexity of the business. They reflect the full range of work undertaken, addressing all significant risks (asbestos and non-asbestos). Roles and responsibilities are clear at all levels, they are linked to competency management arrangements and performance appraisals. Training is based on Training Needs Analysis, staff development is considered at all levels.	Site-specific assessments record significant findings and identify practical control measures for plans. Plans provide clear instruction, guiding the work of supervisor and operatives; used by management to assess the performance of site teams and enabling analyst to verify cleanliness. Accurate, timely notifications (& amendments) made to the relevant authorities. Appropriate number of suitably skilled and experienced operatives / supervision provided for planned work. Inductions / training / medical / face fit requirements are in place and reviewed at appropriate intervals. Appropriate equipment & materials are supplied. Effective inspection, maintenance, testing, cleaning, storing, charging and reporting regimes are in place for all equipment (RPE, vacs, NPUs etc). Orderly record keeping enables auditing of effective maintenance, training needs etc.	Audits, safety tours, hold-points in plans, check lists & site diaries etc. actively test: (a) the adequacy of assessments / plans and (b) site progress against plans. Completed works, job files and client feedback are routinely reviewed in order to troubleshoot and guide future improvement. Monitoring & measuring activities are recorded in a consistent way and are used in performance reviews, competency assessments and periodic management reviews. Arrangements are reviewed at defined intervals (or sooner, in the event of changes, incidents, etc); arrangements are revised and developed as necessary.	Site presence is used to reinforce policy & procedures, plan of work etc. Systems for encouraging input and feedback (informal / formal); management arrangements and working procedures are informed by feedback from operational staff, ensuring that they match actual practice. Genuine two-way communication on risk assessments / plan of work / general procedures, between management, supervision and operatives. Roles and responsibilities are meaningful and clearly communicated. Reasonable targets are set and communicated; these form part of performance appraisals.

Performance standards: set out in company procedures, roles & responsibilities, Contractors' Guide, training content, ACoP, industry guidance etc.
Competency evidenced by: one to one discussion, practical demonstration, management observation & appraisal, photographic evidence, qualifications etc.

Guidance: the six steps of the competency cycle

1 Establish roles

1.1 Establish each employee's role and identify relevant competencies using the competency tables.

- LHs consider the particular role and personal development needs of each employee, using relevant topics and elements from all three Tables, as necessary. For example, an experienced 'senior' Operative might use elements from both Tables 1 and 2; Contracts Managers and Directors in small organisations may use a collection of competencies taken from all three Tables. An example of this process is provided in the appendix.

2 Agree performance standards

2.1 Agree performance standards to support the relevant competencies identified in Step 1.

- A range of existing materials and guidance can be used to form the basis of performance standards: HSE guidance, industry guidance, training materials, occupational standards etc. These materials can be cross-referenced or copied into company general procedures etc. They should develop over time as the organisation learns from the process and how it works, in practice, with its own employees.

- Standards should be clearly defined, auditable and measurable. They represent an agreement on expected performance between the organisation and the staff carrying out assigned roles. Worker involvement should be encouraged when standards are being developed as those carrying out the work are best placed to ensure that the standards reflect actual practice.

- Employers should focus on 'outcomes' when producing standards, i.e. the performance standard should describe what competent performance looks like, what it achieves and what an individual will need to do to demonstrate competent performance.

2.2 Performance standards describe the types of competencies (knowledge, skills and behaviour) required by the employer and the level of performance the employer expects.

- The performance standard should include a description of required knowledge, skill and behaviour and what this means, in practice. For example, standards for controlled removal techniques would include consideration of the materials (types and applications of asbestos products) employees are expected to work upon and the environments employees are expected to work in.

- Performance standards can include examples of effective (and ineffective) behaviours, to help understanding and consistency.

3 Collect evidence

3.1 Collect evidence of the employees' performance.

■ Organisations are already collecting evidence, monitoring and recording performance issues on a day-to-day basis; this may provide much of the evidence required for a competency management system. Even in the smallest organisations there can be records kept in site files and diaries etc.

■ Observation of natural workplace performance should be the primary form of evidence to demonstrate required knowledge, skills and behaviour. A wide range of evidence is available and LHs should consider operational constraints and the 'best fit' for testing different types of competencies. For example, observation of an operative performing RPE checks can demonstrate an ability to follow RPE checking procedures, but oral questioning might be used to confirm that the health consequences of not following procedures are understood. In practice, a range of methods will be used for each competency. In addition to observation, other evidence gathering methods might include:

◆ Oral questioning;
◆ Simulation exercises / tasks;
◆ Written examination (this is unlikely to be appropriate for practical competencies).

■ Evidence may be obtained through a variety of sources, some more formal than others. LHs should ensure that where possible a range of evidence sources is used and that LHs are able to demonstrate a systematic, robust approach. Sources of evidence may include:

◆ Management review of job files, site diaries, hold points and other data collected during site work;
◆ Supervisors site reports;
◆ Feedback from line manager / colleagues / clients;
◆ Audits (internal and external and management site visits);
◆ Exposure records;
◆ Exceptional reports, incidents, incentive/reward schemes;
◆ One-to-one appraisals;
◆ HR reports;
◆ Qualifications (NVQ's, RSPH Qualifications etc.).

■ Given the importance of observation, site audits (and management site visits / inspections) are an invaluable tool for assessing competencies. However, 'audits' must be designed carefully, so that they test the relevant competencies. The design of any assessment process must provide a valid and sensitive measure of the type of competence required and ensure that different assessors would give similar results in similar circumstances.

Produce a Training Needs Analysis (TNA)

4

'Training' can be provided in many ways and is not only formal, classroom-based presentation. A line manager verbally coaching and correcting work practices on a live site is a form of training. Training could also include teaching, tool-box talks, discussions and demonstrations.

4.1 Produce TNA by comparing actual performance of employees (assessment evidence) with desired performance (performance standard).

■ Training Needs Analysis (TNA) involves a continuous comparison between the existing knowledge (or behaviours or skills) and desired knowledge. It will often be informal and will be considered by line managers on an ongoing basis: training, in all its forms, should always be provided on the basis of TNA. A training need is a requirement for knowledge, skills, or a change in behaviour to enable satisfactory performance.

■ Assessors use a range of assessment methods to compare the individual's performance against the standards. Assessors will confirm competence (or otherwise), identify strengths, weaknesses and training needs, making appropriate records of any judgements made. For example, assessment findings might be summarised in a 'competency matrix' or 'personal log book', which clearly identifies where the expected performance level for each competency element has or has not been met.

■ Assessors might use evidence to determine a range of training needs. For example, where an experienced asbestos removal operative fails to follow the company's decontamination procedures, there could be a training need to refresh the process and confirm that the employee is able to follow it. This example may also highlight training and support needs for the supervisor involved, as he is expected to implement plans and work methods and maintain site control. Similarly, it may be that the company's procedures were not correct, or that training was not delivered well: this could be performance evidence for the manager responsible for writing and maintaining those procedures.

4.2 Use competent assessors to carry out TNA.

■ Supervisors and managers etc. should already be assessing competence on a day-to-day basis and are therefore well placed to act as 'assessors'. All assessors need to be instructed in the assessment process and have an appropriate level of knowledge and experience in the competency being assessed. Experience and knowledge of the subject gives the assessor credibility. The level of expertise required depends on the form of assessment. For example, in-house coaching is likely to be adequate for an assessor carrying out "on the job observation" of simple tasks.

■ An assessor should be someone who has sufficient contact with the individual, with the opportunity to observe and monitor actual performance in the working environment.

◆ A line manager is well placed to assess competence as s/he observes (and is responsible for) performance on a daily basis;

◆ Feedback should be given to individuals on a regular basis and training needs will be identified during the course of the assessment;

◆ LHs management arrangements will include clear guidelines for assessors on what should be recorded and how.

4.3 Determine the appropriate mechanism for addressing competency gaps.

■ Where demonstrated performance does not meet the expected performance level, consider what actions may be necessary. Minor issues will normally be addressed by immediate site action, for example by a site supervisor or visiting contracts manager etc. However, repeated minor issues and major skills gaps may require formal training.

5 Provide Training

5.1 Training content (and delivery method) is based on TNA.

■ Training is delivered to fulfil individual needs: both content and method of delivery will vary depending on the nature of those needs. For example, for those with extensive training requirements, training may involve formal classroom teaching combined with practical training. For others, it could be delivered as part of other health and safety updates and in minor cases, it will be addressed verbally by line managers. As further examples, a tool-box talk might refresh experienced workers on particular removal standards; managers' meetings might be used to "peer review" plans of work. As described above (section 4.2), a one-off minor issue might be immediately addressed via coaching / instruction / direction from the site supervisor or visiting manager.

In general terms, training will:

◆ Provide new information, e.g. changes in legislation and work practices (such as use of new equipment or wetting techniques);

◆ Remind employees of the risks they face working with asbestos;

◆ Reinforce procedures such as the use of hygiene facilities, use and maintenance of RPE and how to use controlled removal techniques;

◆ Share good practice and eliminate bad practice.

5.2 Training is provided at appropriate intervals.

■ Individual training needs should be met on an ongoing basis: training will be delivered as and when required. LHs should not wait for 'annual refresher' dates to address performance issues. Appropriate intervals for training depend on the nature of training needs: for example if a Contract Manager's sketch for a plan of work is lacking in detail, then immediate coaching would be given on the agreed standards for sketches. Similarly, where an operative is not wearing PPE correctly, the supervisor would be expected to immediately address this issue. Where repeated or complex issues are identified, more formal training will be necessary. For example, where there are repeated issues with the quality of planning, a contract manager might be scheduled to attend more formal training on planning and assessment.

■ It is essential for recently trained employees (particularly those new to asbestos related work) to put their newly acquired skills and knowledge into practice on the job as soon as possible. Employers, supervisors and managers will play an important role in coaching new employees by reinforcing good work practices and correcting bad ones. See also section 6, which discusses on-going assessment.

■ The Approved Code of Practice accompanying the Control of Asbestos Regulations 2012 requires refresher training to be given every year, or more frequently where gaps have been identified by training needs analysis. As described above, many performance issues may be addressed by immediate action. Training should never be delayed until an 'annual refresher' date where more prompt action is appropriate. In practice, routine refresher sessions will form part of an organisation's management arrangements. Such refreshers would review the organisation's management arrangements (the standards, methods of assessment etc) and, as a minimum, they will provide training on:

◆ **individual (and team performance) against management arrangements, and;**
◆ **where things have gone wrong, and;**
◆ **provide an opportunity to share good practice.**

5.3 Training is delivered by suitably competent people.

■ All training should be provided by instructors who are competent, i.e. they have adequate personal practical experience in the licensed asbestos sector, theoretical knowledge of all relevant aspects of the work and the ability to deliver effective training courses.

■ To be fit for purpose, training must reflect the LH's own policies, procedures and standards.

6 On-going assessment

6.1 Competency is monitored and assessed on an on-going basis.

■ Line management continually monitors the performance of staff against the agreed performance standards. Arrangements for the on-going assessment of competency should be reflected in general systems for measuring performance (site audits, safety tours etc.). TNA should be regarded as a process for sustaining competence, personal development and continuous improvement.

■ The frequency and type of monitoring / assessment depends on the likelihood of "skill decay" and the safety criticality of the task. For infrequent tasks, normal day-to-day work may not provide any opportunities for performance to be demonstrated. In such a case, it may be necessary to set tasks, run simulations or exercises. On the other hand, day-to-day work can provide good performance evidence for routine, frequent tasks, such as decontamination procedures or preparing plans of work. See section 3, above for sources of evidence and assessment methods.

6.2 Competency is formally reviewed on an annual basis

■ There should be formal reviews for all employees in the form of performance appraisals. Formal appraisals should be carried out annually (at least); more frequent appraisals will be necessary for a new employee during their probation period. In all cases, an immediate review should take place where:

◆ work methods change;

◆ the type of equipment used to control exposure changes;

◆ the type of work carried out changes significantly;

◆ gaps in competency are identified.

■ As described above, monitoring and assessment should be on-going. Where appropriate, information, training updates or other management action (e.g. new working techniques or changes to legislation) should not wait for annual refresher training, which may be too far in the future. Evidence of delegates' successful completion of basic training should be provided to external training providers before enrolling them on refresher training.

6.3 Supporting and supervising staff.

■ The level of supervision and monitoring appropriate for an individual depends on their competence and the risks associated with the work they are doing. In the licensed asbestos industry, new employees or temporary / agency staff need increased levels of supervision in order to confirm competency. Increased supervision and support may also be appropriate where an experienced employee is found to be having difficulty meeting performance standards.

- Where individuals have worked in the industry before, a new employer cannot assume that they are competent. For example employees:

  - **may be unaware of their new employer's safety policy and particular systems of work;**
  - **may have received inadequate training in the past;**
  - **may have developed ways of working that do not match their new employers' standards.**

- Induction training, covering in-house health and safety procedures, will always be necessary for new employees. New employees would also be expected to work under very close oversight of senior managers until the company can be satisfied about basic competencies, compliance with company procedures and the standards of work being achieved on site.

- Decisions about supervising and supporting staff should be reflected in job planning and resourcing. For example, an inexperienced Contract Manager would need increased attention if the type of work planned is more complex than he has previously experienced. Similarly, the supervisor (and operatives) chosen for particular work need to have the competencies that reflect the demands of the job. Where direct and immediate supervision of new / agency staff is required this will require a 1:1 pairing with experienced staff.

Appendix: using the competency guidance

The following are illustrative examples of how the guidance might be used, in practice. The examples are intended to promote discussion rather than act as a precise model to follow; they give a skeleton overview of the process when applied to (1) a Contract Manager in a small licensed company and (2) an experienced Operative working in a large organisation. They are intended to illustrate broader points about the process that will be applicable to many different situations.

Example 1 Contract Manager

X has worked for the same small licensed contractor for many years. He reports directly to the Managing Director. There are 5 other people in the company working with asbestos (1 Supervisor and 4 Operatives).

1. Establish roles

X's job title is CONTRACT MANAGER but he has a wide range of duties. He prices, assesses and plans jobs, and also acts as Supervisor on occasion. At busy times he acts as a removal Operative.

Many of the topics across all three competency tables directly apply to X:

- ◆ The Managing Director thinks elements from Table 3 are most important: (2) Directing & supporting work, (3.1 and 3.2) Monitoring, measuring and review and (4) Leadership and worker involvement;
- ◆ Table 2 – all of these supervisory topics apply (during busy times);
- ◆ Table 1 – when he needs to help with practical removal work, all of the competencies in Table 1 are relevant.

> *A "job description" and /or "roles and responsibilities" description should be available for all roles. In practice, the process of reviewing the competency tables ensure that these are up to date. The competency-based process necessarily requires discussion with the individuals concerned about what they do and the standards they are expected to achieve; it is an excellent way of encouraging worker engagement and involvement.*

2. Performance standards

The company has a 'general procedures' file that has been developed over many years. This, along with the Contractors' Guide, industry guidance notes, the Approved Code of Practice accompanying the Control of Asbestos Regulations 2012 and the notes in the Competency Tables ("skills, performance level required") will form the basis of the standards staff are expected to follow. As this is a small company, clarification, refinement and review of these standards is expected to be a gradual process over the coming months / years.

> *Steps 1 and 2 of the competency cycle should identify whether or not the company's policies and procedures reflect what staff are actually being asked to do, on a daily basis. The competency-based approach is likely to involve on-going development and fine-tuning of the way the company records its policies and expectations etc. "Accurate" general procedures can be the focus of health and safety management; they can act as reference point for auditors and for in-house appraisals. They should cover the full range of competencies, including those required for supervisory and management roles.*

As a starting point, the Managing Director and X develop a matrix of relevant competency elements for X's role. They make reference to appropriate supporting material and this forms a basic 'performance agreement'. They will use it as a cover page for a performance/training log. Over time, any areas of uncertainty or doubt are identified and closed out. Over time, the company renews and revises its general procedures and policies, ensuring that these written statements support and reflect actual practice in a clear and measurable way.

For X, they agree that his role in planning work is particularly important: they discuss the way plans are produced and the key features they will expect plans to address. This was previously not covered in their standard procedures document: initially, they review the "job description" and simply say that plans are expected to follow HSE guidance in the ALG memo on plans of work (due to be replaced by a revised HSG247 in 2015).

3. Collect evidence

The company already had a number of formal/informal ways of collecting performance evidence. X and the Managing Director share the same office space and so are in day-to-day discussion about contracts and how they are progressing. The company was already using a) informal site visits by the Managing Director; b) site diaries and job files; c) "Customer satisfaction" reports from clients; d) external (trade association) audits.

The competency-based approach inevitably causes the Managing Director to review these 'evidence' and assessment methods. "Directing and Supporting Work" (planning, in particular) and "Leadership" were identified as the most important parts of X's role and initially the employer focuses on these.

For example, the Managing Director commits to reviewing a sample of completed job files:

- ◆ he will question X, as necessary and explicitly seek feedback from clients about the way jobs progressed;
- ◆ he introduces a requirement for amendments to notifications and plans to be recorded in the job file;
- ◆ he will explicitly seek feedback from supervisors on the content and format of the risk assessments and plans X produces for them;
- ◆ to address the supervisory and core practical competency elements, the Managing Director commits to visiting a small sample of sites, to see work in progress.

As with the other core practical and supervisory competencies, the Managing Director will refer to the 'competency matrix' (produced at steps 1 and 2) when carrying out his job reviews or site visits.

He assesses performance through observation, making brief notes of what is well-demonstrated and anything that requires further examination or questioning. He commits to setting aside an hour every four months (at least) to have a dedicated meeting with X; at these meetings, he will use X's competency matrix to guide discussions.

For a small organisation, it can be challenging to demonstrate independent assessment / quality assurance for the competency judgements that are being made. This is typically addressed in three ways:

1) The company needs to be able to demonstrate that their approach is systematic. In this case, the reference point is the matrix of competencies relating to X's role. The Managing Director can use this as a 'performance/training log' to keep track (brief notes suffice) of what 'evidence' he has for these competencies being demonstrated etc.

2) Internal 'audits', 'safety tours' and management reviews etc must show that the relevant competencies are being monitored.

3) External service providers (training / assessors / auditors): a 'second pair of eyes' can be very effective but the Managing Director needs to make sure that the external provider is measuring and assessing against the Managing Director's procedures and systems. Any reports produced for the company must be in a format that will help with appraisals and TNA.

The Managing Director talks with his external auditors about how they can incorporate the competency elements into their site visits and audit reports. They explore different approaches – for example, they will try carrying out fewer 'general audits' each year, replacing some with audits that explicitly assess the performance of individuals on site (including X) against the relevant competency elements. Given the importance they have placed on X's planning role, they ensure that the external auditors are clear on what the company's expectations are on this subject.

4. TNA

The discussions between the Managing Director and X immediately identify some training needs; X had not received practical training in RPE/PPE use or decontamination for many years. Because of this, his annual refresher training will now always cover Table 1 topics 2 (RPE) and 5 (decontamination) and incorporate a requirement for X to demonstrate these practical skills to an independent assessor. In addition, neither X nor the Managing Director felt comfortable that they were 'up to speed' with guidance on both planning and competency management itself, influencing their ability to identify and meet many of the standards behind competencies in Tables 2 and 3. They will seek training workshops on these particular issues.

In addition to the above, the Managing Director will use his 4-monthly review with X to review the observations and assessments made during that time, using the matrix of competencies as a reference point; they will discuss strengths and weaknesses and identify possible areas for further reinforcement / assessment / assistance, either through formal training, external advice and audit or joint visits. In this case, the Managing Director is not satisfied that X's site visits are demonstrating appropriate "monitoring and measuring" Table 3 – 3.1/3.2.

5. Training

The Managing Director decides to use external trainers to deliver refresher training on practical RPE / decontamination. He will also ask the training providers to provide an update on industry developments (air management, use of electronic planning and auditing systems, leadership & worker involvement).

X's "monitoring and measuring" competencies are addressed through internal 'training' sessions with the Managing Director. They clarify the standard that they both should expect to see (see "Skill, performance level required" for Table 3 – topic 3); as a result they review some job files together and they agree a method for X's site visits to positively test (and document) whether or not plans and assessments are working well, in practice. An outline note of this 'training' is recorded against X's competency matrix.

6. On-going assessment

The Managing Director will continue to collect evidence, as described above, further developed by the external / internal training that has been delivered. The four-monthly meetings assess X's current performance and any areas needing more support, but they are also used to modify and clarify standards, roles and responsibilities, policies and procedures

Example 2 **Experienced Operative**

Y is an experienced Operative working for a large contractor; the employer runs a number of regional offices each supporting a number of operational teams. Operatives will work with various supervisors, depending on the needs of particular jobs; they are line managed by Supervisors on individual jobs, but report to Contract Managers for the purposes of appraisals. The organisation has dedicated H&S and Quality Managers.

1. Establish roles

Y doesn't want to be a Supervisor, but in reality he does take on 'senior' responsibility on site. He often sets up DCUs, and organises paperwork for his Supervisor. He often takes responsibility for checking an area is visually clean, before four stage clearance and frequently takes on responsibilities associated with feeding back site issues to the Contract Manager.

◆ Table 1 – all competency elements are relevant, apart from 3.4 (ancillary work). Under the 'controls' topic, Y refers to all of the techniques that are mentioned in the company's General procedures.

◆ Table 2 – 'Site organisation and Control': elements 3.1 – 3.5 all relevant; 'Effective teamwork and communication' 5.1, 5.2 and 5.3 are relevant.

> *The process of reviewing the competency Tables ensure 'job descriptions' and/or 'roles and responsibilities' are kept up to date for all roles. The competency-based process necessarily requires discussion with the individuals concerned about what they do and the standards they are expected to achieve; it is an excellent way of encouraging worker engagement and involvement.*

2. Performance standards

The company has collated various sources to act as 'standards' for their business. The key practical and management tasks are gathered into a procedures manual. The company is in the process of reviewing and refining these so that each represents a clearly expressed standard, with defined assessment methods.

They have used staff reviews / appraisals to clarify roles and responsibilities. They have used team / management meetings and audits to question whether or not their policies and procedures reflect the competency Tables, making amendments and adjustments where necessary. They get agreement that the standards they have produced are relevant and accurate in the opinion of those expected to follow them.

> *Steps 1 and 2 of the competency cycle should identify whether or not the company's policies and procedures reflect what staff are actually being asked to do, on a daily basis. The competency-based approach is likely to involve on-going development and fine-tuning of the way the company records its policies and expectations etc. "Accurate" general procedures can be the focus of health and safety management; they can act as reference point for auditors and for in-house appraisals. They should cover the full range of competencies, including those required for supervisory and management roles.*

The company develops their own 'competency tables': they have templates for the different roles in the business – Operative, Supervisor, Contract Manager, Assessor, Regional Manager. These are used as the basis for individual log books for each member of staff.

Y's personal record outlines the competencies identified above; for each competency there is a brief outline of what standard of performance is expected and how it will be measured and assessed.

The company stresses two aspects of Y's role, in particular. Firstly, there's an expectation that operatives will always follow appropriate working methods: the decontamination procedure, the 'standard operating procedures' for the full range of asbestos removal tasks, use of ladders, safe erection of tower scaffolds etc and the site-specific measures explained in individual plans of work.

Secondly, Y often carries out visual inspections of the enclosure; steps 1 and 2 have caused some discussion about standards for this important task. As a result, a very simple "procedure" has been added to the company manual detailing expectations (progressive systematic approach, tools to be used etc.).

3. Collect evidence

Supervisors and Contract Managers play a central role in actively assessing Y's performance. Management systems encourage supervisors and line management to note examples of both strong performance and areas in need of improvement in Y's log. To capture Y (and others') performance when carrying out visual inspections (prior to four stage clearance), the company ensures that all analysts are encouraged to provide information on 'initial fails' and that this is accurately recorded in site files.

Audits by both the internal H&S / Quality team and Contract Managers / Senior management of other teams will actively assess particular groups of competencies on site – this is done through a range of observation and questioning. Again, this is recorded in Y's log book.

Brief quarterly 'catch up' meetings with Y's Contract Manager present an opportunity for discussion in relation to the performance log (though the 'catch up' is also used to discuss other personnel issues such as annual leave, timekeeping, feedback on supervision etc.). The Contract Manager will ensure that all competencies in Y's log book are being considered, directing auditors and supervisors, as necessary.

Office-wide information is analysed and will provide subject matter to be discussed at the team meetings; this takes the form of tool-box talks but can also be an opportunity to, for example, have operatives demonstrate mask checks, or describe decontamination procedure, particular controlled removal methods etc.

4. TNA

There is an annual appraisal system where Y discusses the performance log with his Contract Manager; the Contract Manager is responsible for collating the needs of those in his team and liaising with his Quality/H&S team regarding the best way of closing gaps between actual and required performance levels.

The company has made the decision that practical training (and assessment) in RPE use and maintenance and the use of personal decontamination procedures will be required of all staff working in enclosures. Y's log book shows that he has not carried out any injection work recently; he will be given practical refresher training on this subject.

5. Training

Because of the size of this company, it is feasible to run in-house training sessions on particular practical topics. For example, Y attends a practical training session on the use of injection systems, in a number of simulated removal situations in the training centre. This is run by in-house trainers and is based on the performance standards in the company's procedure manual.

A number of items in Y's log book concern behavioural issues – for example, he has been challenged a number of times about ensuring his work environment is cleaned 'as he goes'. For Y, the issue is covered in one of a series of tool-box talks developed by the company to address particular performance gaps.

6. On-going assessment

The evidence gathering methods described above are used on a continual basis. Recent training and appraisals are used to guide the focus of on-going assessment. For example, when injection equipment is required, Y's Contract Manager is keen to ensure that Y is on the job with an experienced Supervisor who will instruct, monitor and assess how his training is put into practice. When auditors are considering Y's performance at future visits they are looking for evidence that his work is orderly and clean.

Appendix:
assessing performance – example situations

The examples illustrate how typical performance issues might be considered within a competency management system. They are intended for illustration and discussion and are not meant to be definitive. A written description like this can give the (wrong) impression that this is necessarily a complicated, bureaucratic process. In practice it should often be very easy to establish possible performance gaps and take appropriate action. For example, once an individual's 'competency matrix' and recording system has been set up, it should be straightforward to maintain a "performance log". Although these examples list examples of performance gaps and matters in need of improvement, it is also worth stressing the benefit of recording and recognising positive performance. There is no reason why the competency management system should not recognise and reward good practice.

Operative not clean shaven

	SITUATION	POTENTIAL PERFORMANCE GAPS	ACTION (IMMEDIATE & FOLLOW UP)
1	The Supervisor notices an operative is not clean-shaven.	Is the Operative **choosing** not to follow RPE procedure, or does he not understand it? Does he understand how tight-fit RPE works, and what the health effects are? *With reference to the competency tables: "RPE is not being worn correctly" (Table 1, 2.1) and / or "health effects of asbestos etc are not understood" (Table 2 1, 1.1).* *It is possible that this also reflects poor training, induction or recruitment processes (Table 3, 2.4) – ie management failings.*	The Operative is immediately instructed to shave. A note is made in the Operative's performance log. The Supervisor pays close attention to this issue on future shifts. Given the importance of effective RPE, a formal warning might be necessary. Certainly, where repeated, the Supervisor would need to talk to his line Manager about formal disciplinary action. In the longer term, this may be a topic for tool-box talk / group meeting / annual refreshers. If company management reviews have highlighted a number of such issues, management need to question the broader training, induction and recruitment procedures.
2	A visiting Manager (or Auditor, Inspector etc.) observes that an Operative is not clean-shaven.	In addition to the above, we need to ask why the site-supervisor had not already addressed this on site? Line Managers need to investigate the underlying cause: does the supervisor have personal difficulties, leading to poor performance on site? Does the Supervisor lack control? Perhaps he is often unshaven, himself? Did the Contract Manager give him sufficient time or resources for this project (perhaps time is so tight that 'basic' standards checks are being missed)? Does the Contract Manager challenge unshaven Operatives / Supervisors when on site? If he doesn't, then the Supervisor will assume that management doesn't really see this as a serious issue. *The Supervisor may be having difficulty "ensuring appropriate site methods are used" (Table 2, 2.1), he may be failing to "lead by example" (Table 3, 4.1) or he may be struggling to "complete daily / other checks" (Table 2, 3.5). The Contract Manager's approach to directing and supporting work (Table 3, 2.4), his approach to monitoring, measuring and review (Table 3, 3.1) and his leadership (Table 3, 4.1) may be the real underlying issue.*	*In addition* to the immediate actions described in (1) above, there needs to be discussions to identify potential underlying supervisory issues. The visiting Auditor / Manager would be expected to draw attention to expected standards; a note would be made on the Supervisor's performance log. In the longer term line management needs to ensure expected standards are clear and understood. If this (or similar) issues are repeated, it would be reasonable to expect a line manager to meet the Supervisor and record the fact that expected standards have been discussed, refreshed and agreed. Site performance must be reflected in Contract Managers' own performance records: problems associated with site control, monitoring or resourcing would form part of his own performance reviews etc: this could trigger more senior management oversight, refresher training, system reviews etc. ***Poor resourcing, monitoring and leadership by Contract Managers have a fundamental impact on site standards, emphasising the need to have a balanced range of sources of performance evidence.***

Amendments to Plans of Work

	SITUATION	POTENTIAL PERFORMANCE GAPS	ACTION (IMMEDIATE & FOLLOW UP)
1	Job file review shows that multiple amendments were made to the plan of work during the course of a project.	Following notification, the plan was changed in a number of ways: * the sketch was re-drawn with new transit / waste routes * method was changed to use steps, rather than tower scaffold (for some areas) * work sequence altered The **Supervisor** was expected to check the plan of work against site reality before the job starts (Table 2 1.1), communicate effectively with management and get authorisation for any changes (Table 2, 5.3). Has this happened? If initial planning and notification was suitable and sufficient, why were such changes necessary (3, 2.2 and 2.3)? Perhaps the **Contract Manager / Assessor** failed to pay enough attention to detail on site, or has a lack of understanding of 'viable' methods of work, or did not communicate clearly with the client? Potentially, the gaps are at **a more senior level.** Are the expected standards made clear to assessors and Contract Managers (Table 3, 1.4) and is their performance routinely measured? Is there a shared understanding of what good plans will look like and how they will be used? In practice, are there enough Contract Managers for the amount of work being undertaken (Table 3, 2.1)? Are Supervisors expected to use their own phones / data allowances to liaise with managers (3, 2.1)?	Job reviews should seek feedback from Supervisors and Contract Managers. In this case, the person carrying out the review needs to establish why changes were made and how they were authorised. If the procedure did not seek authorisation, then the Supervisor's line manager needs to discuss this with the Supervisor and this should be done as soon as possible. A note will be made in the Supervisor's performance log for future reference. Repeated instances might trigger more personalised training workshops for the Supervisor, to improve their performance. More significantly, there are many implications for the performance of senior managers and for the management arrangements generally. Contract Managers' own line managers should be using such evidence when assessing performance. Amendments to plans might be recorded against Contract Managers' performance; repeated instances would require remedial training or workshop sessions on planning. Major failures might reasonably trigger immediate training / review and changes to the role and level of support being provided. Occasional peer review sessions with other Contract Managers would help ensure consistency. Repeated issues might lead to formal training, and formal mentoring by management. Senior management should be able to identify patterns of performance for all of their Contract Managers for all of the key competencies they have agreed. Senior managers will be actively seeking feedback about whether or not work is completed in accordance with plans of work. When general management arrangements are reviewed, senior managers would need to consider how they demonstrate that accurate planning and notification is important to them.

Analyst fails visual inspection (stage 2 of clearance)

	SITUATION	POTENTIAL PERFORMANCE GAPS	ACTION (IMMEDIATE & FOLLOW UP)
1	Analyst fails visual inspection	The Analyst's "stage 2" failure means that Supervisor's visual inspection has not been done to the required standard; the area has not been cleaned as far as reasonably practicable (Table 2, 4). This situation is linked to many other potential performance gaps. Perhaps the supervisor hasn't implemented the plan properly (Table 2, 2.1 and 2.2) and has failed to keep it clean and orderly (Table 3, 3.1). Perhaps the Supervisor has set a poor standard about the expected standard of cleaning (leadership, Table 3, 4.1). The gaps may be at Contract Manager level: its possible that the plan itself needed to be clearer about areas that would be problematic for clearance and the Contract Manager failed to establish and agree standards before the job started; there was not proper discussion between assessor, client and analyst (Table 3, 4.3, table 3, 2.2). It's also possible that the team simply didn't have time & resources to clean the area properly (Table 3, 2.4). There may be an underlying problem where routine management expectations for planning, monitoring etc do not expect plans to address 'difficult' to clean situations. In this case, the gaps are at senior management level, associated with policies, roles & responsibilities, general procedures, etc. (Table 3, 1) and perhaps also with leadership qualities (Table 3, 4).	**SUPERVISOR** – this kind of information from the analyst is extremely helpful and needs to be encouraged. "Failures" should be recorded as part of the job file and would be discussed as part of routine job review in order to identify any underlying causes of the failure. The Supervisor's line manager needs to be sure that performance standards are understood by this Supervisor. Training / workshops etc. may be appropriate to address this and ensure the same standards are being used by all. Repeated examples would trigger more formal training, greater supervision and support or perhaps a review of the Supervisor's role and responsibilities etc. **CONTRACT MANAGER** – visual inspection failures are valid evidence for a CM's performance record. CM's line managers need to satisfy themselves that failures are not being made more likely by weak planning and resourcing. Again, standards need to be clear and agreed. Training / workshops can ensure that different CMs share the same understanding and expect similar approaches when liaising with analysts and clients regarding 'difficult' jobs. **SENIOR MANAGEMENT** - routine reviews of management systems should identify patterns of failure - this will help direct future audits, future training sessions and the company standard procedures etc.

Appendix: definitions

Assessment	The process of documenting knowledge and understanding, skill, and behaviour and attitude.
Assessor	Any individual who collects evidence in relation to the competency elements. This will often be a line manager, or training / quality / health and safety staff employed by the licence holder; where external assessors are used, they will be working in accordance with the LH's competency management arrangements.
Authentic	All work assessed in relation to the training needs analysis has been produced solely by the learner.
Behaviour	The way in which one acts or conducts oneself.
Competence	Any reference to competence, competent persons or competent employees in relation to working with asbestos is a reference to a person or employee who has received adequate information, instruction and training for the task being done and can demonstrate an adequate up-to-date understanding of the work, required control measures and appropriate law. They must also have enough experience to apply this knowledge effectively.
Competency topic	A broad area of asbestos removal related work to which the competency outline relates.
Competency outline	A description of what needs to be achieved for each competency topic.
Competency elements	Knowledge, skills and behaviours that must be demonstrated in order to meet the requirements of a competency topic.
Current	All work assessed in relation to the training needs analysis is still relevant at the time of assessment.
Duties	The tasks required of the employee within their role.
Evidence	Evidence is information upon which an assessor makes a judgement of competency.
Performance standards	A performance standard is a management approved expression of the performance expectation that must be met to confirm a competent level of performance.
Reasonably practicable	This means balancing the level of risk against the difficulty of putting control measures in place (in terms of money, time or trouble): action would not be reasonably practicable where costs are grossly disproportionate to the level of risk.
Role(s)	These identify the responsibilities that employees have within the organisation.
Sufficient	All work assessed in relation to the training needs analysis covers all the assessment criteria.
Training	Any provision of information and instruction: it can be provided in a variety of ways ranging from the very informal (verbal comment) to the formal ('classroom' based course). The acquisition of skills, concepts or attitudes that result in improved performance within the job environment.
Training Needs Analysis (TNA)	Is the process of identifying gaps between the requirements of the role and an employee's actual practice, behaviour and knowledge.

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