

July 2015

# Examiners' Report

## NEBOSH International Diploma in Occupational Health and Safety (Unit A)



---

# Examiners' Report

## NEBOSH INTERNATIONAL DIPLOMA IN OCCUPATIONAL HEALTH AND SAFETY

### UNIT IA: INTERNATIONAL MANAGEMENT OF HEALTH AND SAFETY

**JULY 2015**

---



## CONTENTS

Introduction	2
General comments	3
Candidate performance	4
Learning outcomes	4
Examination technique	15
Command words	16
Conclusion	17

# Introduction

NEBOSH (The National Examination Board in Occupational Safety and Health) was formed in 1979 as an independent examining board and awarding body with charitable status. We offer a comprehensive range of globally-recognised, vocationally-related qualifications designed to meet the health, safety, environmental and risk management needs of all places of work in both the private and public sectors.

Courses leading to NEBOSH qualifications attract around 50,000 candidates annually and are offered by over 600 course providers, with examinations taken in over 120 countries around the world. Our qualifications are recognised by the relevant professional membership bodies including the Institution of Occupational Safety and Health (IOSH) and the International Institute of Risk and Safety Management (IIRSM).

NEBOSH is an awarding body that applies best practice setting, assessment and marking and applies to Scottish Qualifications Authority (SQA) regulatory requirements.

This report provides guidance for candidates which it is hoped will be useful to candidates and tutors in preparation for future examinations. It is intended to be constructive and informative and to promote better understanding of the syllabus content and the application of assessment criteria.

© NEBOSH 2015

Any enquiries about this report publication should be addressed to:

NEBOSH  
Dominus Way  
Meridian Business Park  
Leicester  
LE19 1QW

tel: 0116 263 4700  
fax: 0116 282 4000  
email: [info@nebosh.org.uk](mailto:info@nebosh.org.uk)

## General comments

---

Section 1.4 of the August 2011 edition of the Guide to the NEBOSH International Diploma in Occupational Health and Safety ('the Guide') makes it clear that the standard of this Diploma is comparable to Honours degree level. A qualification at this level requires a significant amount of input from the candidate, both in terms of studying the core material supplied by their course provider and in terms of reading around the subject.

The Diploma has a minimal pre-entry requirement, which is set out at section 1.7 of the Guide. Candidates are assumed to have a broad basic knowledge of health and safety that is provided by a level 3 qualification in Occupational Health & Safety, in particular the NEBOSH International General Certificate. However, it should be borne in mind that a level 3 award is significantly lower than a Diploma and that a considerably higher degree of academic attainment is therefore expected at Diploma level.

Health and safety is a broad-ranging subject that requires the development of a wide set of skills. While it will take considerable time to attain the experience necessary to advise effectively, that experience should be underpinned by a thorough understanding of the principles set out in this Diploma syllabus. It is expected that candidates for the NEBOSH Diploma will spend a significant amount of time reading around the subject using resources such as the HSE website and the freely downloadable information that it contains, such as Industry Guidance and Approved Codes of Practice.

It is recommended that prospective candidates consider carefully whether they have the necessary study skills to embark on an award at this level. Study is demanding and examinations provide a thorough test of understanding.

The examinations for the Diploma assess not only core knowledge but also the ability to apply that core knowledge. It is therefore incumbent on the candidate to ensure that they understand the material and can do more than simply recite it.

Those enrolling on the Diploma must have the necessary skills in English comprehension and writing. The minimum standard of English required for candidates is set out at paragraph 1.8 of the Guide. Where such skills are lacking they should be developed and improved before attempting the Diploma course and certainly before sitting the Diploma examinations.

It must be stressed how important it is for candidates to take responsibility for their own learning and to study diligently throughout the course. Attempting to study for an award at this level without having studied effectively or without the underpinning ability to read, comprehend and apply information will almost inevitably lead to failure.

This report has been prepared to provide feedback on the standard date examination sitting in July 2015.

Feedback is presented in these key areas: examination technique, command words and learning outcomes and is designed to assist candidates and course providers prepare for future assessments in this unit.

Candidates and course providers will also benefit from use of the 'Guide to the NEBOSH International Diploma in Occupational Health and Safety' which is available via the NEBOSH website. In particular, the guide sets out in detail the syllabus content for Unit IA and tutor reference documents for each Element.

Additional guidance on command words is provided in 'Guidance on command words used in learning outcomes and question papers' which is also available via the NEBOSH website.

Candidates and course providers should also make reference to the Unit IA 'Example question paper and Examiners' feedback on expected answers' which provides example questions and details Examiners' expectations and typical areas of underperformance.

## Unit IA

### International management of health and safety

#### Candidate performance

This report covers the examination sitting in July 2015.

#### Section A – all questions compulsory

- Question 1**
- (a) **Give** the meaning of the term '*health and safety culture*'. (2)
- (b) **Outline** organisational factors that may act as barriers to the improvement of the health and safety culture of an organisation. (8)

This question is designed to assess candidates' knowledge of learning outcomes 6.1 and 6.7 of the syllabus. *Explain the internal and external influences on health and safety in an organisation; and Outline the factors which can both positively and negatively affect health and safety culture and climate.*

In part (a) Examiners were looking for candidates to link together shared attitudes within the workforce and behaviour of employees with regard to health and safety.

Often candidates recognised that culture is influenced by shared values, attitudes and beliefs however few were able to make the link to subsequent behaviour in the workplace.

Part (b) of the question required candidates to *outline* organisational factors that may act as a barrier to improving health and safety culture and therefore attempted to test candidates understanding of culture and those areas that make cultural improvement difficult. This seemed to make the question difficult for candidates as many answers were presented in the form of how to improve the culture rather than the difficulties of improving culture. On the other hand there were a good number of candidates that referred to issues such as lack of management commitment, inadequate resources and high staff turnover as barriers and picked up marks accordingly.

Overall the response to this question was not good and it seems that knowledge of culture, what influences it and what are the barriers to cultural improvement was not well understood by candidates.

In order to gain high marks in this question Examiners were expecting candidates to give information around, unclear roles and responsibilities which leads to a lack of understanding of what is expected behaviour by workers, lack of confidence in management which can cause workers to be sceptical of management initiatives, poor or ineffective communication arrangements which leads to a lack of understanding of worker requirements, ineffective leadership of health and safety which creates a perception of lack of importance of priority for safety in comparison with other business requirements, etc.

---

<b>Question 2</b>	(a)	<b>Distinguish</b> between prescriptive legislation and goal-setting legislation.	<b>(2)</b>
	(b)	<b>Outline TWO</b> benefits <b>AND TWO</b> limitations of:	
	(i)	prescriptive legislation;	<b>(4)</b>
	(ii)	goal-setting legislation.	<b>(4)</b>

---

This question covers learning outcome 8.1: *Describe comparative governmental and socio-legal, regulatory and corporate models*. Since the International qualification does not focus on a single country's legal system a broad understanding of standards, principles in relation to laws and legal systems is a crucial part of the International Diploma syllabus.

For the most part candidates were able to make the distinction between prescriptive legislation and goal setting legislation by stating that prescriptive laws set specific standards to be complied with and goal setting laws set a goal or target to be achieved.

In the second part of the question candidates either wrote a good, clear account of benefits and limitations that gained good marks or they demonstrated a lack of understanding of the terms beyond that required in part (a).

In order to gain good marks Examiners were looking for candidates to offer two limitations and two benefits for each. A difficulty encountered by the Examiners with answers to this question was the fact that many candidates provided only a limited response whereas an outline was required by the question, eg a benefit of prescriptive legislation may be: that it does not require detailed interpretation by experts and that it is easy to enforce since the requirements are set out in the law and it is therefore clear what has to be done to comply. There were numerous examples of candidates answering the question by saying: easy to enforce, does not require a high level of expertise. While both these points are relevant they do not answer the question and are therefore not mark worthy.

---

<b>Question 3</b>	ILO-OSH 2001 gives guidelines on occupational safety and health management systems.	
	(a)	<b>Outline</b> requirements for a health and safety policy. <b>(5)</b>
	(b)	<b>Outline</b> key objectives of a health and safety policy. <b>(5)</b>

---

This question assessed the learning outcomes specified in Elements 1.3 and 1.4 of the syllabus: *Explain the principles and content of effective health and safety, quality, environmental and integrated management systems with reference to recognised models and standards; Outline the role and responsibilities of the health and safety practitioner.*

Course providers should note that the *ILO-OSH 2001 Guidelines on Occupational Health and Safety Management Systems*, is specifically identified in the *tutor references* section of the syllabus.

It appeared that not many candidates were aware of the guidelines or their requirements for a health and safety policy. Of equal concern was the fact that few candidates could relate to what requirements were likely to be in place for the policy.

The ILO-OSH Guidelines in Section 3.1.1 state that:

*The employer, in consultation with workers and their representatives, should set out in writing an OSH policy, which should be:*

*(a) specific to the organization and appropriate to its size and the nature of its activities;*

- (b) *concise, clearly written, dated and made effective by the signature or endorsement of the employer or the most senior accountable person in the organization;*
- (c) *communicated and readily accessible to all persons at their place of work;*
- (d) *reviewed for continuing suitability; and*
- (e) *made available to relevant external interested parties, as appropriate.*

Marks were available in part (a) to candidates who were able to get across any of these elements of the requirements, that are common to most management systems in relation to the health and safety policy. It was expected that the generic nature of the requirements would yield reasonable marks for candidates that understood the need for a health and safety policy.

The ILO-OSH Guidelines go on to set out the main objectives of the health and safety policy as being:

- (a) *protecting the safety and health of all members of the organization by preventing work-related injuries, ill health, diseases and incidents;*
- (b) *complying with relevant OSH national laws and regulations, voluntary programmes, collective agreements on OSH and other requirements to which the organization subscribes;*
- (c) *ensuring that workers and their representatives are consulted and encouraged to participate actively in all elements of the OSH management system; and*
- (d) *continually improving the performance of the OSH management system.*

Again marks were available for candidates that could capture these areas in the context of the health and policy.

In many instances in both Parts (a) and (b) there were examples of candidates providing a list of ideas, that while hitting the right subject areas in some cases, does not answer the question that requires an *outline*.

Course providers should ensure that candidates are well prepared technically for the examination as well as academically aware in order to be able to provide the Examiners with mark worthy points in the examination.

---

<b>Question 4</b>	<b>Outline</b> how good quality information can be obtained when interviewing a witness to a workplace accident.	<b>(10)</b>
-------------------	--	-------------

---

This question assesses the learning outcome from Element 2.4: *Explain loss and near miss investigations; the requirements, benefits, the procedures, the documentation and the involvement of and communication with relevant staff and representatives.*

A core aspect of the health and safety practitioner's role, interviewing witnesses is a key skill that, in theory, should be common knowledge to students of health and safety and practising professionals.

Examiners were expecting an *outline* of points such as the timing of the interview, the environment, competence of the interviewer, establishing rapport using appropriate language and questioning techniques such as open and closed questions to establish facts and not apportion blame being just some of the mark worthy areas.

Overall the response to the question was good with many candidates gaining good marks. However, as with previous questions and a common theme throughout this examination, candidates did offer appropriate subject areas but without the necessary *outline* and therefore marks were limited in an area where there was clearly knowledge that could have attracted better marks.

Course providers and candidates are reminded that the level of study of the Diploma requires candidates to have and be able to demonstrate the understanding and application of established techniques and research in the areas of study.

---

**Question 5**     **Outline** the rights and responsibilities of worker representatives as set out in the International Labour Organisation Convention No.155 and Recommendation 164.

---

**(10)**

The learning outcome of Element 6.4 is: *Explain the role, influences on and procedures for formal and informal consultation with workers in the workplace.* This question set out to assess candidates' knowledge in this area with specific reference to the ILO Convention and Recommendation.

As with Question 3 on the examination, the documents are referenced as being key areas of knowledge although their mention in the question seemed to put off many candidates.

Article 19 of Convention 155 and Paragraph 12(2)(a)-(j) of Recommendation 164 sets out the rights and responsibilities of worker representatives.

In many cases the rights and responsibilities are generic in nature and do not fall far from what would reasonably be expected within the workplace. Examples include:

- be given adequate information on safety and health matters, enabled to examine factors affecting safety and health, and encouraged to propose measures on the subject;
- be consulted when major new safety and health measures are envisaged and before they are carried out, and seek to obtain the support of the workers for such measures;
- be consulted in planning alterations of work processes, work content or organisation of work, which may have safety or health implications for the workers;
- be given protection from dismissal and other measures prejudicial to them while exercising their functions in the field of occupational safety and health as workers' representatives or as members of safety and health committees;
- be able to contribute to the decision-making process at the level of the undertaking regarding matters of safety and health;
- have access to all parts of the workplace and be able to communicate with the workers on safety and health matters during working hours at the workplace;
- be free to contact labour inspectors.

In order gain good marks candidates were expected to offer the technical content in the context of the worker representative by way of an *outline*. All too often candidates seemed to be under the impression that all they were required to do was provide a list of keywords to earn the marks. This is not the case this level of qualification.

Candidates are required to demonstrate a systematic understanding of their field of study and the key aspects from within it. This cannot be done by providing lists, or by requiring the Examiner to assume knowledge as it is not effectively presented in the answers.

Course providers and candidates are advised to ensure that they fully understand the academic and assessment requirements of the qualification in order to realistically achieve the standards required of the Diploma qualification.



---

**Question 6** Competence may be considered as the ability to perform adequately in a given role.

**Describe** arrangements to help ensure competence in an organisation. **(10)**

---

Learning outcome 7.4 was the subject of this question: *Explain appropriate methods for improving individual human reliability in the workplace.*

The *explain* descriptor in the learning outcome should suggest to course providers and candidates that this area requires a detailed understanding of the subject area such that candidates are prepared in the examination to illustrate their answers with appropriate detail. A response that consists primarily of *provide training* does not satisfy this requirement.

In the Guidance Document Managing for Health and Safety, HSG65, 2013, the HSE define competence as “*Competence is the ability to undertake responsibilities and perform activities to a recognised standard on a regular basis. It combines practical and thinking skills, knowledge and experience.*” (HSE, 2013).

Consequently the arrangements that could be in place to ensure competence include such arrangements as:

1. Clearly defined job roles to ensure that standards of performance and competence levels are clear and measurable;
2. Procedures for recruitment or selection for job roles is such that experience and ability form part of the criteria ensuring competence is maintained;
3. Arrangements to ensure that workers receive adequate training and opportunities to develop experience in the relevant tasks;
4. Arrangements to monitor performance of workers and subsequent intervention plans to ensure that performance standards are maintained in line with the job role requirements;
5. Arrangements for introducing training following changes to job specifications including substances and equipment;
6. A system to check the suitability and competence of contractors to fulfil outsourced roles;
7. Arrangements to ensure that adequate cover is provided in case of staff absence such as vacations and sickness;
8. Adequate resource availability and allocation to provide adequate arrangements for providing information and effective communications to workers in relation to work activities and job roles.
9. Arrangements for testing both skills and decision making for safety critical roles such as vehicle or machinery operation;
10. Arrangements for health promotion and health surveillance schemes to ensure that workers are monitored in terms of being physically able and capable of completing job roles and not adversely affected by the role.

There were examples of candidates that had interpreted the question as requiring a definition of or explanation of what competence was. Clearly this type of answer is unlikely to attract even moderate marks since the question required knowledge of organisational arrangements to ensure that workers were competent to fulfil roles.

## Section B – three from five questions to be attempted

**Question 7** A manufacturing organisation with major on-site and off-site hazards is analysing the risks and controls associated with a particular process and containment failure. Following process containment failure, a failure detection mechanism should detect the release. Once detected an, alarm should sound and a suppressant should be discharged. Additionally, in order to prevent an uncontrolled release, an operator is required to activate manual measures following the discharge of the suppressant. The organisation has decided to analyse the risks associated with an uncontrolled release from the process using an event tree based on the table below.

Activity
Process containment failure and release
Failure and release detection
Alarm sounders
Release suppression
Manual control measures activated

- (a) Using the information provided in the above table, **construct** and event tree that shows the sequence of events following the process containment failure **AND indicate** where an uncontrolled release may occur. (6)
- (b) **Outline THREE** benefits **AND THREE** limitations of event tree analysis. (6)
- (c) **Outline** the methodology for a 'cost benefit' analysis for the process described. (3)
- (d) **Outline** factors that should be considered in order to determine whether the frequency of an uncontrolled release would be tolerable. (5)

The Event Tree Analysis (ETA) along with other advanced risk assessment techniques and failure tracing techniques are regular questions on the International Diploma. Assessing the learning outcome from Element 4.1 and 4.4 this question gave candidates an opportunity to demonstrate their understanding of data interpretation and application of the event tree.

The Learning Outcomes for Element 4.1 and 4.4 are: *Describe how to use internal and external sources of information in the identification of hazards and the assessment of risks; Explain the principles and techniques of failure tracing methodologies with the use of calculations.*

As a section B (optional) item it was expected that candidates would gain good marks and indeed this question, whilst not the most popular was the highest scoring question of section B. However, there were some interesting points of note.

The lack of numbers and lack of requirement to calculate a frequency or likelihood of occurrence seemed to throw some candidates. The aim of the question is to establish candidates' understanding of the construction, use and limitations of event trees as well as judgement in terms of risk tolerability.

The ETA diagram was generally well done with most candidates gaining high marks for this and also for outlining the benefits and limitations of the technique that include:

- Provides a visual representation of the sequence of events;
- Useful therefore in identifying points of potential failure and subsequent points of intervention to mitigate the consequences;
- Can be used with quantities to calculate the likelihood and frequency of occurrence.
- Limitations on the other hand could have included:
- Theoretical paths only are considered as well as excluding partial operation or failure of a control measure;
- The process of ETA can be complex and time consuming requiring expert input and the data used can be difficult to obtain or not reliable.

Candidates that failed to provide the *outline* asked for, eg *this method is using risk assessment process* were not awarded high marks

Fewer candidates, however provided good answers to parts (c) and (d). The concept and methodology of cost benefit analysis does not seem to be well understood. For 3 marks Examiners were looking for candidates to express a process of quantifying loss in terms of monetary values, quantify the cost of improvements in terms of monetary value and a comparison the two outcomes. Candidates could also have made reference to the value of money overtime, eg a monetary value today is worth less in the future due to inflation, also the cost of borrowing capital to make improvements would be worth a mention, although these concepts seemed too advanced for candidates of the Diploma.

Similarly in part (d) few candidates mentioned tools like using numerical risk data or published tolerability data such as in *Reducing Risks Protecting People*, the results of a Cost Benefit Analysis study or the impact on production of the cause of the release. Candidates did however pick up a mark or two by mentioning the proximity of the plant to homes and the health implications of a release.

---

#### Question 8

An organisation has decided to introduce a permit-to-work system for maintenance and engineering work at a manufacturing plant that operates continuously over three shifts.

- (a) **Outline** key issues that will need to be addressed when introducing and maintaining an effective permit-to-work system. (10)

- (b) A year after the introduction of the permit-to-work system, a regular routine inspection shows that many permits-to-work have not been completed correctly or have not been returned.

**Outline** possible reasons why the system is not being properly adhered to. (10)

---

This question assessed candidates' knowledge of permits-to-work (PTW), introduction and maintenance as well as the practical reasons why the system may degenerate. PTW's are covered in learning outcome 5.3 on the syllabus: *Explain the development, main features and operation of safe systems of work and permit-to-work systems.*

The question proved popular and was answered by around 93% of candidates sitting the examination. This may be a reflection of the likelihood that PTW's are commonly used to support safe systems of work in many organisations.

Answers to the question were variable in quality with many candidates choosing to explain what a PTW is, which was not required in the question. This suggests that candidates may have learned PTW as a standard answer and delivered the content irrespective of the question.

There were many examples of good, well thought out answers to part (a) that covered areas such as; providing a clear definition of the job areas where the PTW would apply and ensuring that each PTW was identifiable with a unique reference to avoid confusion. Provision of appropriate information on the PTW form such as hazards, controls and persons responsible clearly identifiable on the documentation; development of the PTW system covering operation of the system in terms of permit requests, allocation, cancellation, extensions, etc to ensure that the permit is properly managed throughout the process and not lost or not handed back following work completion; where multiple permits were likely to be in operation the process for recording and displaying permits as well as the process for completion and handover of permits between shifts would need to be completed prior to introducing the PTW system. Additionally arrangements would need to be in place to cover training of persons directly involved with the PTW system along with a system to monitor individual performance to ensure that systems were effectively maintained and training interventions such as refresher brought in as required when identified during monitoring activities; other monitoring should be in place to allow for auditing and checking of the operation of the system over time. Finally it would of course be necessary to involve the workers through consultation on the development of and the implementation of the new PTW system.

In part (b) Examiners were looking for candidates to provide some insight into the reasons that health and safety systems may deteriorate, in this particular case in relation to the PTW system. Again many candidates were able to allude to areas such as *lack of training and monitoring of the system, poor culture, production pressures, etc* and managed to collect marks. However it was evident once again that candidates seemed to be unaware or unable to provide the required level of detail to gain high marks as many resorted to lists or very brief accounts of the issues. In order to earn high marks Examiners are looking for candidates to demonstrate a level of understanding that reflects study at level 6, ie an in depth understanding of the specific topic and learning outcome. Answers that are limited to statements such as: *method statements not attached, risk assessments missing; complacency*; do not satisfy the examination requirement for marks.

---

<b>Question 9</b>	(a)	<b>Explain</b> the objectives of:	
	(i)	active health and safety monitoring;	<b>(5)</b>
	(ii)	reactive health and safety monitoring.	<b>(4)</b>
	(b)	<b>Outline</b> a range of active health and safety monitoring methods.	<b>(5)</b>
	(c)	<b>Outline</b> examples of reactive performance data that could be used to benchmark health and safety performance.	<b>(6)</b>

---

This item is based on learning outcomes Element 3.2 and 3.3: *Explain the need for, and the objectives and limitations of, health and safety monitoring systems; Describe the variety of monitoring and measurement techniques.*

This question proved a popular option on the paper with over 90% of candidates electing to answer it.

Answers to this question seemed to vary from very good answers that were well thought out and comprehensive to those candidates who were confused between the differences between active and reactive monitoring. Additionally, as with other answers on this examination sitting there were examples where candidates appeared to have a broad understanding of the subject however lacked either the knowledge or the technique to construct answers that were required by the action verbs *explain and outline*.

In part (a) of the question, Examiners were expecting candidates to provide an explanation of the objectives of both active and reactive monitoring. Candidates that explained that the objectives of active monitoring was to provide a view of current performance in relation to health and safety, provide information about and evidence of performance in practice and to identify hazards and risks before any loss events occur and therefore prevent an occurrence gained high marks.

In relation to reactive monitoring candidates were expected to explain that reactive monitoring uses tools to measure historic performance and identify the consequence of hazards in the workplace as well as identifying the causes of failure. Additionally reactive performance can be used to gather data over time and therefore be used to compare performance over time by analysing trends and benchmarking performance against other standards.

There are of course large areas of overlap between active and reactive monitoring in terms of the objectives and Examiners were able to award marks for these areas of overlap if they were covered in either area of explanation. In particular, areas of overlap which were worthy of marks included: providing a basis for continual improvement and measuring legal compliance. Also both monitoring techniques can be used to demonstrate organisational commitment to improving health and safety standards and consequently improving morale within the workforce.

In part (b) of the question candidates were again expected to provide an outline of active monitoring methods and could have referred to methods such as; auditing, inspections, sampling, health surveillance etc. Of course in order to gain the marks an outline was required rather than a list, which seemed to be the most common approach to the answer.

However, the outline must provide the context and meaning of the method in question. As an illustration an answer that gives the following level of detail **will not** attract marks:

Regular Audits: Auditing of health and safety systems is very important in the performance of a good health and safety system.

Conversely an answer that provides the following level of detail **would** attract marks:

Audits: An independent examination of the management system against an agreed standard.

Part (c) of the question required candidates to give examples of reactive performance data that could be useful for benchmarking. Whilst most candidates were able to mention accident and incident data fewer were able to expand the examples to include such useful data as: Ill-health reports, employee complaints, enforcement action or lost time through absences, etc.

---

<b>Question 10</b>	An organisation has decided to use a behavioural change programme to improve its safety performance.	
(a)	<b>Give</b> the meaning of ' <i>behavioural change programme</i> '.	<b>(2)</b>
(b)	<b>Outline</b> actions that should be taken before the behavioural change programme can be implemented.	<b>(9)</b>
(c)	<b>Outline</b> potential barriers to implementing the behavioural change programme.	<b>(9)</b>

---

Human Factors and Behavioural change is covered in Element 7 of Unit A and specifically in Learning Outcome 7.7: *Outline the principles, conditions and typical content of behavioural change programmes designed to improve safe behaviour in the workplace.*

The documents *Behavioural Safety: Kicking Bad Habits*, *IOSH* and *Reducing Error and Influencing Behaviour*, *HSE* are both key texts in this part of the syllabus and listed in the *tutor references* section.

This optional question from Section B was the least popular of the optional questions with less than 30% of candidates choosing to answer it.

The question was not well answered overall despite the fact that behavioural safety is a key health and safety subject in many organisations. In part (a) Examiners were looking for candidates to link reducing unsafe behaviours and increasing safe behaviours through a defined programme to reduce accidents overall.

In part (b) candidates were asked to outline actions to be taken before the programme is implemented. Examiners were expecting candidates to outline areas such as: consultation with workers and worker representatives in order to communicate the aims, objectives and benefits of the programme; agree what are unsafe and safe behaviours and prioritise those for action, developing measures of the behaviours along with improvement targets and a format for gathering the relevant data. Once agreed the team should then agree a pilot programme to be run followed by a review and subsequent improvements where necessary, communicating the findings to relevant stakeholders including workers and management. Once final amendments are agreed then a final implementation date should be set and the programme rolled out with regular reviews and updates.

Part (c) of the question sought to assess candidates' knowledge of some of the difficulties in implementing such a programme. Key areas where marks were available were where candidates outlined: Failure or lack of consultation with workers; worker concerns about observations not addressed; acceptance of shift of responsibility from management and systems to workers actions; observations which are ineffective due to lack of training; ineffective or lack of feedback to workers; disagreements over safe working practices and their implementation; failure of management to support findings of the programme and encourage/lead safe behaviour; difficulty in maintaining the programme over time where quick changes are not evident; conflict with reward schemes for payment or production.

These are just some of the areas for which marks were available. Many of the points identified above are in fact typical difficulties in implementing any programme of change within the working environment. It was surprising that more candidates were not able to apply an understanding of implementation of initiatives to the behavioural change programme scenario and gain more marks. It seems that candidates are only prepared in specific areas and have difficulty in applying knowledge across other aspects of health and safety management. It is of course unclear to the Examiners as to whether this is a function of the teaching methods employed by course providers generally or whether it is a function of the style of learning with candidates of the International Diploma.

---

<b>Question 11</b>	(a)	In relation to the improvement of health and safety in organisations, <b>describe</b> what is meant by:	
	(i)	corporate probation;	(2)
	(ii)	adverse publicity orders;	(2)
	(iii)	punitive damages.	(2)
	(b)	<b>Outline</b> the mechanism by which the International Labour Organisation (ILO) can influence health and safety standards in different countries.	(8)
	(c)	<b>Describe</b> what is meant by the term 'self-regulation'.	(6)

---

This final question on the question paper aimed to assess the learning outcomes associated with Elements 8.1, 8.2 and 8.3: *Describe comparative governmental and socio-legal, regulatory and corporate models; Explain the role and limitations of the International Labour Organisation in a global health and safety setting; Explain the role no-governmental bodies and self-regulation has in securing common health and safety standards in a global economy.*

This final question was the third most popular in Section B with over 50% of candidates choosing it as their option.

This part of the syllabus, Element IA8, *Regulating Health and Safety* is an important areas of study since it is this subject area that pulls together much of the management system content previously covered and gives detail to the legal reason for managing health and safety. Obviously standards and regulatory models vary between countries and consequently the focus of this part of the syllabus is aimed at legal concepts and models rather than detailed legal requirements.

In this modern age of globalisation it is essential that the safety practitioner or organisational advisor has an understanding of regulatory models including types of legislation and the concept of self-regulation, as it is likely that their organisation will be affected by a range of regulatory models and voluntary codes.

The answers to this question varied in their quality with those that knew the subject gaining good marks and those that did not left guessing at the terms and inevitably attracting only low marks if any.

Part (a) of the question required little more than a basic understanding by the candidate of corporate probation, adverse publicity orders and punitive damages and those that knew these terms fared well. It was clear however that there were candidates who, it seemed, were unaware of the terms but had a guess at what they might mean.

Examiners were looking for candidates to make the following points:

Corporate probation: this is an order imposed by a court as a result of the organisation committing an offence. The order would usually require the organisation to carry out specific acts through the board of directors.

Adverse publicity orders: requires the offender to publicise the fact that they have committed an offence and have subsequently been convicted. The order would usually require the offender to provide details of the offence and actions taken, so seeking to name and shame the offender.

Punitive damages: a financial award in excess of compensatory damages intended to punish the offender for, usually malicious, wrong doing and act as a deterrent to others.

Part (b) of the question related to the influence of the International Labour Organisation (ILO) on health and safety standards. The ILO exerts influence in a number of ways including; creating International Labour Standards through Conventions and Recommendations. Conventions can be ratified by member countries which binds them to the requirements of the convention. The recommendations are used to provide further detail around the requirements for countries to utilise. They are usually aimed at both member country and organisational level giving guidance on improving standards. The ILO will also develop and lead international initiatives supported by NGO's such as the Decent Work Agenda as well as lobbying governments to improve standards. Where conventions are ratified by member countries the ILO may monitor the application of the standards and provide technical assistance where necessary to help implement the spirit of the standards.

In part (c) Examiners were expecting a description of the concept of self-regulation that could have included points around the following: Self-regulation is the term used to describe an organisation's voluntary sign up to a code of conduct or activity. This is often driven by membership of a trade group or other affiliation where the parties are bound by a mutually set of agreed rules set out in a code of conduct or practice. Acceptance of the rules is by voluntary agreement. There would usually be a method also agreed for the resolution of disputes in relation to the code of conduct. Compliance with the code is usually evidenced by independent third party monitoring. The threat of removal from the trade group by removing certification or accreditation of compliance is often used as a form of sanction for non-compliance, eg certification to OHSAS 18001 standard for health and safety management.

Voluntary codes are a key driver in many countries to improve standards and include certification to standards such as OHSAS 18001 for health and safety management, ISO 14001 for environmental management and ISO 9001 for quality management. For many organisations it is the voluntary acceptance of such codes, ie self-regulation that drives market value, customer acceptance and requirements for contracting. Such codes may be present alongside a legislative framework requiring compliance as well as where the legislative framework and enforcement is absent.

## **Examination technique**

The following examination techniques were identified as the main areas of improvement for candidates:

### **Candidates' handwriting was illegible**

In many instances it was noted by Examiners that the handwriting of candidates was often difficult to decipher. Additionally, it appears that the handwriting of candidates tended to vary during the examination but consistently deteriorated towards the end of the examination.

The examination situation is a stressful time for candidates and while the examination is not a test of the English language scripts must be legible for Examiners to mark them fairly. As the examination progresses candidates can become both mentally and physically tired. Key to the examination is preparation and this includes practising intense hand writing for 3 hours in order to build up some stamina that will stand the candidate in good stead during the examination.

### **Candidates misread/misinterpreted the question**

Examiners noted that there was evidence of candidates not understanding the question that was asked and therefore providing an answer that was not relevant to the question.

The range of English language skills demonstrated in the examination by candidates varies enormously. Examiners often find themselves faced with scripts that do not understand the question and often struggle to write a coherent answer in English. Candidates for this examination should satisfy the required IELTS Level 7 language requirements. Course providers are reminded that it is incumbent on them to provide appropriate advice and guidance to candidates to help ensure that they stand a reasonable chance of success in the study of the NEBOSH Diploma.

### **Candidates unnecessarily wrote the question down**

There were numerous examples of candidates unnecessarily writing down the question before starting to write the answer. Writing down the question can be useful to help frame the answer and ensure that the answer is provided in the correct context required. Of course rewriting the question is both time consuming in the examination and can contribute to candidates becoming fatigued.

Good examination technique is followed where the candidate frames the answer in the context of the question, rather than rewriting the whole of the question. As with the other examination technique points above, good examination technique is developed through practice and good preparation.



## **Command words**

The following command words are listed in the order identified as being the most challenging for candidates:

### **Give**

On the whole most candidates responded well to this command word, often by offering a definition. There was evidence where candidates went into too much detail that left those candidates writing large amounts of text for very few marks.

### **Outline**

Many candidates did not give enough detail to satisfy the command word 'outline' and wrote bullet points or single word answers. Candidates should be able to respond effectively to the command word 'outline'. As required by a Level 6 qualification candidates should be able to demonstrate a detailed understanding of the subject matter and therefore be able to summarise and contextualise technical points in the field of health and safety. Those candidates who did provide good outlines to questions demonstrated understanding of the topic without going into too much detail

### **Explain**

Many candidates seemed to ignore the command word 'explain' and gave sparse and one sentence answers that did not offer a suitable explanation. Those candidates who followed the guidance gave much better answers and were able to explain to the Examiner so that they could understand.

### **Describe**

Many candidates did not understand what was required for 'describe', offering not much more than a list in many cases. Some were able to give detailed answers but often only described one or two points.

In the examination, lists and single word answers will rarely satisfy the requirement of the Examiners in terms of answering the question at this level. It is noticeable that the well prepared candidate has less trouble deciphering command words and tends to gain good marks whereas those candidates who use single word answers will tend not to have the knowledge to write anything further in the context that is required.

For additional guidance, please see NEBOSH's '*Guidance on command words used in learning outcomes and question papers*' document, which is available on our website: [www.nebosh.org.uk/students/default.asp?cref=1345&ct=2](http://www.nebosh.org.uk/students/default.asp?cref=1345&ct=2).

## Conclusion

The feedback from Examiners highlighted that candidates taking the Unit IA examinations in July 2015 needed most improvement in the areas of:

**Element IA1:** Principles of health and safety management. Learning Outcome 1.3: Explain the principles and content of effective health and safety, quality, environmental and integrated management systems with reference to recognised models and standards.

**Element IA3:** Measuring and reviewing health and safety performance. Learning Outcome 3.2: Explain the need for, and the objectives and limitations of, health and safety monitoring systems; Learning Outcome 3.3: Describe the variety of monitoring and measurement techniques; Learning Outcome 3.4: Explain the requirements for reviewing health and safety performance.

**Element IA4:** Identifying hazards, assessing and evaluating risks. Learning Outcome 4.1: Describe how to use internal and external sources of information in the identification of hazards and the assessment of risk; Learning Outcome 4.4: Explain the principles and techniques of failure tracing methodologies with the use of calculations.

**Element IA5:** Risk control. Learning Outcome 5.3: Explain the development, main features and operation of safe systems of work and permit-to-work systems.

**Element IA6:** Organisational factors. Learning Outcome 6.1: Explain the internal and external influences on health and safety in an organisation; Learning Outcome 6.4: Explain the role, influences on and procedures for formal and informal consultation with workers in the workplace; Learning Outcome 6.7: Outline the factors which can both positively and negatively affect health and safety culture and climate.

**Element IA7:** Human factors. Learning Outcome 7.4: Explain appropriate methods of improving individual human reliability in the workplace; Learning Outcome 7.7: Outline the principles, conditions and typical content of behavioural change programmes designed to improve safe behaviour in the workplace.

**Element IA8:** Regulating health and safety. Learning Outcome 8.1: Describe comparative governmental and socio-legal, regulatory and corporate models; Learning Outcome 8.2: Explain the role and limitations of the International Labour Organisation in a global health and safety setting; Learning Outcome 8.3: Explain the role non-governmental bodies and self-regulation has in securing common health and safety standards in a global economy.

With regard to examination technique, candidates sitting this examination should ensure that they give themselves adequate opportunity to be sufficiently prepared for the examination. In terms of preparation it is essential that candidates spend enough time studying, revising and learning the technical content of the material required in the examination, as well as spending time learning and practising good examination technique.

The report has identified areas of the examination where marks have not been awarded to candidates' answers as they have not fulfilled the question criteria. It is frustrating for both Examiners and candidates when marks are not able to be awarded because the candidate has not responded to the command word in the question in an appropriate way, or has not answered the question that was asked.

Additionally, it is clear that there are several candidates who do not have the necessary skills in terms of the command of the written English language to write comprehensive answers to questions. NEBOSH recommends that candidates who enter for this examination are able to satisfy the International English Language Test System score at Level 7 or above. It is important that both candidates and course providers ensure that the necessary language skills are understood in order that there is a realistic chance of achieving success in the examination. Further guidance on the language requirements for the course can be found in the Guide to the International Diploma in Occupational Health and Safety.



nebosh

The National Examination  
Board in Occupational  
Safety and Health

Dominus Way  
Meridian Business Park  
Leicester LE19 1QW

telephone +44 (0)116 2634700

fax +44 (0)116 2824000

email [info@nebosh.org.uk](mailto:info@nebosh.org.uk)

[www.nebosh.org.uk](http://www.nebosh.org.uk)