
Examiners' Report

NEBOSH NATIONAL DIPLOMA IN OCCUPATIONAL HEALTH AND SAFETY

UNIT A: MANAGING HEALTH AND SAFETY

JULY 2019



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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 learners annually and are offered by over 600 Learning Partners, 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) Accreditation regulatory requirements.

This report provides guidance for learners and Learning Partners for use 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.

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General comments

Many learners are well prepared for this unit assessment and provide comprehensive and relevant answers in response to the demands of the question paper. This includes the ability to demonstrate understanding of knowledge by applying it to workplace situations.

There are other learners, however, who appear to be unprepared for the unit assessment and who show both a lack of knowledge of the syllabus content and a lack of understanding of how key concepts should be applied to workplace situations, which is an essential requirement at Diploma level.

This report has been prepared to provide feedback on the standard date examination sitting in July 2019.

Feedback is presented in these key areas: responses to questions, examination technique and command words and is designed to assist learners and Learning Partners prepare for future assessments in this unit.

Learners and Learning Partners will also benefit from use of the 'Guide to the NEBOSH National 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 A 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.

Unit A

Managing health and safety

Question 1 **Outline** how the following societal factors could influence an organisation's health and safety standards and priorities:

- (a) economic climate; (3)
- (b) Government policy; (2)
- (c) business risk profile; (2)
- (d) migrant workers. (3)

This question assessed learners' knowledge and understanding of learning outcome 1.2: Outline the societal factors which influence an organisation's health and safety standards and priorities.

In part (a) learners were able to identify that a poor climate could place health and safety at a lower priority. However, many were unable to expand upon this to give a more in-depth outline and gain more marks.

In part (b) government policy was discussed along the lines of having new laws introduced or enforced, whereas the question was endeavouring to identify the influence rather than the physical mechanisms used. As such, too many learners discussed examples of safety legislation or the enforcement system and missed the opportunity to concentrate on initiatives or policy development.

In part (c) some learners showed limited understanding in relation to how an organisation's 'business risk profile' could be an influence. Others had a clear understanding on the principles of business risk profile but often missed the opportunity to express the view that higher risks equate to more control and vice versa. Better answers outlined how the public perception of industry activities can impact standards.

Part (d) was more fully answered but opportunities were still missed to gain marks. Language barrier was a common answer, but not expanded upon to outline that this was not checked by the employer and training was not adapted.

Overall, many learners were awarded relatively low marks for this question. Several learners missed the opportunity to gain marks by not providing the necessary amount of discussion required by the 'outline' command word.

Question 2	(a) Outline how regulations are made under the Health and Safety at Work etc Act 1974.	(6)
	(b) (i) Outline the <i>purpose</i> of cost benefit analysis as it applies to proposed regulations.	(1)
	(ii) Outline the <i>principles</i> of cost benefit analysis as it applies to proposed regulations.	(3)

This question assessed learners' knowledge and understanding of learning outcome 2.4: Outline the status and procedure for creation of UK Acts, Regulations and Orders.

Overall answers to this question were very limited.

In part (a) some learners appeared to misunderstand the question and outlined how a UK Act is made, with long discussion on green and white papers. Better answers recognised Section 15, the powers of the Secretary of State and the necessary consultation.

In part (b) learners demonstrated a very limited understanding on both the purpose and principles of cost benefit analysis, as applied to proposed regulation. For (b) (i) many missed the concept of value to society and in (b) (ii) matters of timescale and conversion of costs and benefits to monetary values was completely missed.

Question 3	A Health and Safety Executive (HSE) inspector visits a small, limited company. The inspector finds an unguarded machine and decides to serve a prohibition notice on the employer.	
	(a) Outline the legal criteria that must be satisfied in order for a prohibition notice to be lawfully served.	(2)
	(b) If the employer chooses to appeal against the notice:	
	(i) Identify the effect of the bringing of the appeal;	(1)
	(ii) Identify the timescale within which an appeal must be made;	(1)
	(iii) Identify the possible outcomes of the appeal.	(2)
	(c) At a subsequent visit the inspector discovers that the unguarded machine is still in use by an employee as instructed by the Operations Director. The prohibition notice is still in force. The inspector decides to bring a prosecution against the Operations Director under Section 37 of the Health and Safety at Work etc Act 1974 for breaching the prohibition notice.	
	(i) Outline the legal criteria that the inspector would need to satisfy to bring a successful prosecution.	(3)
	(ii) Identify the maximum penalties that would be available on conviction of the Operations Director.	(1)

This question assessed learners' knowledge and understanding of learning outcome 3.3: Explain the responsibilities and powers of enforcing agencies and officers and the range of options related to enforcement action, their implications and appeal procedures.

In part (a) many learners were able to gain marks for the legal criteria to be satisfied; although some learners did miss the opportunity to outline the requirement for risk of serious personal injury and others offered points relevant to an improvement notice.

In part (b) better answers clearly set out the timeframes, the immediate effects of the appeal and its outcomes. Limited answers did not fully identify the effect of bringing the appeal, did not give the correct timeframe, nor explored the outcome of the appeal beyond cancelling the notice.

In part (c) (i) the legal criteria to be satisfied for a successful prosecution led to difficulties among learners. Too many answers gave a non-legal subjective-based discussion on the criteria for a civil claim. Few learners could outline Section 37 of HSWA and/or the consent and connivance. In part (ii) learners often confused organisation and individual penalties.

Question 4 A large transport organisation has recently suffered an incident in which several passengers died. The subsequent investigation criticised the organisation for putting profit before safety.

Outline how the Board of Directors could lead the development of a safety culture that values health and safety with equal importance to other areas of risk.

(10)

This question assessed learners' knowledge and understanding of learning outcomes 9.2: Explain the organisational benefits of effective health and safety leadership; 9.7: Explain health and safety culture and climate; 9.8: Outline the factors which can both positively and negatively affect health and safety culture and climate; 9.6: Explain the role, influences on and procedures for formal and informal consultation with employees in the workplace; and 9.5: Explain the requirements for managing third parties in the workplace.

The focus of this question was on how the Board of Directors of an organisation can lead to the development of a safety culture. Learners needed to outline good examples of how this could be done.

Few learners were able to understand that a Board's role is more about the concepts and direction rather than day-to-day safety tasks. Therefore, comments such as providing training and writing risk assessments missed the main points being asked for. Learners missed the opportunity to demonstrate strategic decision-making requirements of the Board and translate this into real-world examples.

Many learners incorrectly focused on how the organisation could improve safety through development of their employees, or focused upon management systems such as risk assessment, procedures, accident reporting and training.

Question 5 Routine, situational and exceptional are all categories of violations in the workplace.

(a) **Distinguish** between routine, situational and exceptional violations.

(4)

(b) **Outline** how *situational* violations can be minimised.

(6)

This question assessed learners' knowledge and understanding of learning outcome 10.3: Explain the classification of human failure.

In part (a) better answers were able to adequately distinguish between the three types of violation. Although limited answers lacked understanding of exceptional violations with examples not always relating to the concepts. Additionally, some learners delved into discussion based upon slips, lapses and errors rather than violations.

In part (b) better answers outlined a reasonable range of ways to minimise this type of violation. Marks were gained by those who included ergonomics, working environment and equipment as well as behavioural awareness and monitoring.

There was however a tendency to either focus on only a few examples, such as supervision and risk assessments therefore limiting overall marks, or to explore one concept and ignore others. Limited answers did not link the answer to the situational violation.

Question 6

A manufacturer wants to introduce a permit-to-work system at a factory that operates continuously over three shifts.

Outline the essential features that will make an effective permit-to-work system at the factory.

(10)

*An outline of the content of the permit-to-work form is **not** required.*

This question assessed learners' knowledge and understanding of learning outcome 8.3: Explain the development, main features and operation of safe systems of work and permit-to-work systems.

Better answers were given by learners who adhered to the guidance to **not** outline the content of a permit-to-work form. Some good points were outlined such as record management, monitoring, training and communication arrangements. However, opportunities to gain marks were missed by learners not breaking down a feature into more detail or conflating two or more features into one general point that was not specific enough to be mark worthy; for example, training of permit issuers and training of permit receivers.

Limited answers did not heed the guidance and outlined the permit-to-work form or answered a different question about the benefits of a permit-to-work system.

At Diploma-level wider knowledge and a strategic approach on systems and procedures is expected.

Question 7

A manufacturing organisation has designed and installed a large oven for use in an industrial process. The oven has a power-operated door that closes and locks automatically when the oven is switched on. There is no means of releasing the door lock from inside the oven and there is no alarm.

An employee of the manufacturing organisation, accompanied by a contractor's employee, entered the oven to perform a maintenance task. They were locked in when the oven was switched on by another member of staff who did not know that they were inside. Both men suffered serious burns as a result. Staff had not been given training on the risks associated with using the new oven and there were no written instructions for cleaning and maintenance.

- (a) **Outline** the possible breaches of the Health and Safety at Work etc Act 1974 that may have been committed by the manufacturing organisation. **(8)**
- Use an example of case law to support your answer.
- Section numbers or regulation numbers are **not** required.*
- (b) The injured parties intend to bring an action in the tort of negligence (delict in Scotland) against the manufacturing organisation.
- Outline** what the injured parties will need to show for their claims to succeed. **(8)**
- Use an example of case law to support your answer.
- (c) **Identify** the two main types of damages the injured parties may claim **AND give** an example of what may be claimed under **EACH** type. **(4)**
-

This question assessed learners' knowledge and understanding of learning outcomes 3.1: Explain the key requirements of the Health and Safety at Work etc Act 1974 and the Management of Health and Safety at Work Regulations 1999; and 4.2: Explain the criteria required to establish a successful civil action for breach of statutory duty and negligence, the main defences available and the procedure for assessment of damages under civil law.

In part (a) some learners were able to sufficiently outline the breaches of the HSWA to gain good marks. Other learners gave limited answers in which the breaches were not coherently expressed, and section numbers without further outline were given, and in some cases with a duplication of answers. Some learners provided a widespread answer, including breaches of regulations for which marks could not be awarded. The case law used to support the answer was often not relevant; for example, a civil case was used, or the learner missed the opportunity to draw out the legal point in the case.

In part (b) many learners were able to provide the three basic civil law tests, although some missed the opportunity to gain marks by not providing a sufficient outline and simply stating the tests. At Diploma-level a deeper knowledge is expected. Many learners did not develop their answers further by considering reasonableness and foreseeability. Better answers linked the case law to the tests thereby gaining more marks.

In part (c) better answers correctly identified the types of damages and gave correct examples. Limited answers gave incorrect examples of the damages or rephrased the damage types. Some learners also adopted a widespread approach in an attempt to gain marks.

Question 8	An organisation is considering assessing its health and safety culture prior to implementing a programme of cultural change.	
(a)	Outline what should be considered when assessing the organisation's current health and safety culture.	(10)
(b)	Identify methods the organisation can use to gather information when assessing current health and safety culture.	(2)
(c)	Outline factors influencing the success of a cultural change programme.	(8)

This question assessed learners' knowledge and understanding of learning outcomes 9.7: Explain health and safety culture and climate; 9.8: Outline the factors which can both positively and negatively affect health and safety culture and climate.

In part (a) several learners were able to outline a reasonable range of points to consider when assessing an organisation's culture. Most learners included various management issues but wider individual and systems issues were often omitted. Some learners missed the opportunity to gain more marks by overly elaborating on a small number of issues rather than offering a breadth of points.

In part (b) most learners identified at least one method to obtain data to assess the current health and safety culture of an organisation. Better answers included multiple methods. Some learners did not acknowledge the command word and proceeded to provide a detailed outline.

In part (c) several learners provided an outline around four factors. Opportunities to gain marks were missed by not providing a broad range of factors and instead concentrating on a limited few. Typically, learners were able to provide commitment, training and resources, but answers were often simplistic and discussion on other factors, such as engagement strategies, and overcoming resistance to change were overlooked. Learners appeared to find it challenging to relay information at a management or strategic level.

Question 9

The management of a chemical store with major on-site and off-site hazard potential is analysing the risks and controls associated with a particular storage facility and potential containment failure. Following containment failure ($f=0.5$ per year), an automatic failure detection mechanism should detect the release. Once detected, an alarm sounds followed by a suppressant being dispersed. Finally, in order to reduce the consequences of the event an operator is required to take manual control measures following the release of the suppressant. As part of the analysis, the organisation has decided to quantify the risks from the containment failure and develop a quantified event tree from the data.

Activity	Frequency / reliability
Process containment failure	0.5 per year
Failure detection	0.98
Alarm sounders	0.99
Release suppression	0.8
Manual control measures activated	0.7

- (a) **Outline** why constructing an event tree could be helpful. (3)
- (b) Using the information provided in the above table, **demonstrate** the sequence of events following process containment failure using a simple event tree. (6)
- (c) **Calculate** the frequency of an uncontrolled release resulting from process containment failure. (6)
- (d) **Outline** what should be considered when determining whether the frequency of the uncontrolled risk is tolerable. (5)
-

This question assessed learners' knowledge and understanding of learning outcome 7.5: Explain the principles and techniques of failure tracing methodologies with the use of calculations.

For learners choosing this question, most were confident on the mathematics necessary and consequently good marks were gained in respect to parts (b) and (c). However, this was not always the case and a few learners made significant calculation errors or could not replicate the event tree correctly.

In part (a) very few learners were able to correctly outline the main benefits of event trees. Answers were too general and lacked sufficient detail to gain marks.

In part (b) most learners were able to construct the tree to a satisfactory design to depict the sequence of events. However, some learners could have made better use of the space afforded by the examination booklet in laying out the sequence.

In part (c) many learners were able to gain marks for partially or in some cases fully correctly carrying out the calculation. Most errors were based on calculation – for example adding rather than multiplying, or not converting a decimal number to a frequency.

In part (d) many answers showed a limited understanding in the determination of tolerability. In general, the answers lacked the breadth of factors to obtain good marks with learners concentrating on one or two areas. Some were able to outline the risk/consequence of a release and cost issues, and a few added environmental or health aspects but could not consider wider factors in determining tolerability.

Question 10 An organisation operating in the oil and gas sector employed 5 000 people in 2016. The number of employees has reduced to 4 000 in 2017 and 3 000 in 2018. The table below shows the accident history of the organisation over the past 3 years.

Year	2016	2017	2018
Number of accidents	14	15	14
Number of hours worked	8 000 000	6 400 000	4 800 000
Days lost due to accidents	65	75	90

- (a) **Calculate** the accident frequency rate for **EACH** of the years. **(6)**
Show your calculations at EACH step.
- (b) **Comment** on why the organisation should be concerned about the accident frequency rate. **(2)**
- (c) Human reliability can impact accident rates.
- Outline** ways in which:
- (i) organisational factors can contribute to improving human reliability; **(6)**
- (ii) job factors can contribute to improving human reliability. **(6)**

This question assessed learners' knowledge and understanding of learning outcomes 10.5: Explain how organisational factors can contribute to improving reliability; 10.6: Explain how job factors can contribute to improving human reliability; and 5.2 Explain the use of quantitative methods in analysing loss data.

In general, part (a) was answered well with most learners gaining full marks; those who did not often confused the number of hours worked with days lost.

In part (b) most learners identified that the accident frequency rate rose despite a reduction in employees and hours. Better answers were able to expand on this to consider the severity aspect and greater lost time.

In part (c) learners missed the opportunity to gain good marks due to a limited understanding of the differences between organisational and job factors that contribute to human reliability. As a result, factors were outlined in the wrong category. Also, some learners gave too much detail to a small number of factors instead of outlining a broad range of examples. The marks available should signpost the learners that a similar breadth of answer is required in parts (c) (i) and (ii).

Question 11	An organisation is due to have an external certification audit of its health and safety management system against a recognised standard. The information from the audit will be used in a formal review of health and safety performance.	
(a)	Outline the purpose of health and safety management system auditing.	(4)
(b)	Describe the in-house safety practitioner's role in this external audit.	(6)
(c)	Outline the purpose of a health and safety management performance review.	(2)
(d)	(i) Outline possible <i>inputs</i> to the health and safety management performance review.	(6)
	(ii) Outline possible <i>outputs</i> from the health and safety management performance review.	(2)

This question assessed learners' knowledge and understanding of learning outcomes 6.3: Describe the variety of health and safety monitoring and measurement techniques; and 6.4: Explain the need for and process of reviewing health and safety performance.

In part (a) the purpose of management system auditing was not fully understood by most of the learners. Limited answers lacked breadth and explored the definition of an audit or its contents rather than its purpose. Better answers outlined points on identification of strengths and weaknesses and supporting continuous improvement.

Part (b) produced mixed answers. Better answers described a reasonable range of activities that the practitioner would be involved in linked to the external audit. More marks could have been gained for considering prior planning issues and the final report. Limited answers placed too much emphasis on general day-to-day roles rather than specifically for the purposes of audit, were overly simplistic, or concentrated on one or two points.

Part (c) appeared to challenge learners and it appeared that the purpose of management performance review was not well understood. Some learners considered it could help establish gaps and areas for improvement.

In part (d) the inputs and outputs proved challenging for many learners with too much emphasis often placed upon reactive data sets rather than active indicators in (d) (i) and could not go beyond reports in (ii). Several inputs were overlooked making answers limited. Many learners appeared not to recognise the mark distribution between (i) and (ii) and gave a similar amount of discussion for both parts when (i) was worth more marks.

Examination technique

The following issues are consistently identified as the main areas in need of improvement for learners undertaking Diploma level qualifications:

Learners misread/misinterpreted the question

NEBOSH questions are systematically and carefully prepared and are subject to a number of checks and balances prior to being authorised for use in question papers. These checks include ensuring that questions set for the Diploma level qualifications relate directly to the learning outcomes contained within the associated syllabus guides. The learning outcomes require learners to be sufficiently prepared to provide the relevant depth of answer across a broad range of topic areas. For example, a learner could be asked about the causes of stress, or could be asked about the effects of stress, a question could require a response relating to the principles of fire initiation, or a question could require a response relating to the spread of fire. Therefore, a learner should focus not only on the general topic area (eg stress, fire), but also the specific aspect of that topic to which the question relates.

Examiners suggest that while many learners do begin their answer satisfactorily and perhaps gain one or two marks, they then lose sight of the question and include irrelevant information. Although further points included in an answer can relate to the general topic area, these points are not focused on the specific learning outcome and marks cannot be awarded. However, some learners appear to misread or misinterpret several questions. This situation is more likely due to learners preparing for the examination with a number of stock answers obtained through rote-learning, that again can provide answers that are loosely associated with the topic matter but do not provide answers specific to the question. Such an approach is clearly evident to an Examiner and demonstrates little understanding of the topic matter and marks are not awarded.

Examiners noted a tendency on the part of many learners to write about things that were not asked for, despite the fact that guidance as to what to cover had been given in the question. An example is a question where learners were instructed that there was no need to make reference to specific control measures and yet did so. In another example learners wrote about selection of PPE when the question wording had clearly stated that this had already been undertaken. Another example was where learners wrote about barriers to rehabilitation without relating them to the bio-psychosocial model, even though the question specifically asked them to do this.

Some learners wrote large amounts of text on a single topic where only one mark could be awarded. Learners did not recognise that the amount of marks awarded to each section gives an indication of the depth of the answer required.

It would therefore appear that a sizeable number of learners misread some of the questions, to their disadvantage. This should be a relatively easy pitfall to overcome; learners should ensure that they make full use of the 10 minutes reading time to understand what each question requires. Learners are advised to allow sufficient time to read and re-read the question in order to determine the key requirements. Underlining or highlighting key words can assist in keeping focused and simple mind maps or answer plans can also be useful. An answer plan will often be helpful in ensuring that all aspects of the question are attended to; maps and plans should be kept simple so as not to use up too much examination time; if all aspects are not dealt with it will be difficult to gain a high mark. Learners should not assume when they see a question that it is exactly the same as one that they may have seen in the past; new questions are introduced and old questions are amended. It is therefore of the utmost importance that questions are read carefully and the instructions that they give are followed.

It may help if, when preparing for the examinations, learners write out their answers in full and ask a tutor or other knowledgeable third party to mark their work. In so doing, issues with understanding can be noted and remedial action taken.

Learning Partners and learners should note that various means are used to draw attention to keywords in examination questions. These means include emboldened and italicised text and the use of words in capitals. These means are intended to draw the learner's attention to these words and this emphasis should then be acted upon when making a response. These devices can often assist in giving guidance on how to set out an answer to maximise the marks gained. For example: **Identify THREE** things to be considered **AND** for **EACH**.....

Learners often have a reasonable body of knowledge and understanding on the topic covered by a question, but they have not been able to apply this to the examination question being asked. This could be because sufficient time has not been taken to read the question, noting the words being emphasised.

When preparing learners for examination, or offering advice on examination technique, Learning Partners should stress that understanding the question requirements and the sub-structure of the response to the question is the fundamental step to providing a correct answer. Rather than learning the 'ideal answer' to certain questions effort would be better spent in guided analysis on what a question requires. The rote learning of answers appears to close the learners' minds to the wider (and usually correct) possibilities.

Learners repeated the same point but in different ways

There are instances where learners repeat very similar points in their answers, sometimes a number of times. This is easily done in the stressful environment of the examination. However, once a point has been successfully made and a mark awarded for it, that mark cannot be awarded again for similar points made later in the answer. In some cases, particularly where questions had more than one part, learners gave an answer to, say, part (b) of a question in part (a), meaning that they needed to repeat themselves in part (b) thus wasting time.

One possible reason for this might be that learners have relatively superficial knowledge of the topic - a view supported by the low marks evident in some answers. It appears that, faced with a certain number of marks to achieve and knowing that more needs to be written, but without detailed knowledge, learners appear to opt to rephrase that which they have already written in the hope that it may gain further marks. Another possible reason is a failure to properly plan answers, especially to the Section B questions - it would appear that learners sometimes become 'lost' in their answers, forgetting what has already been written. It may be due either to a lack of knowledge (so having no more to say) or to limited answer planning, or to a combination of the two. When a valid point has been made it will be credited, but repetition of that point will receive no further marks. Learners may have left the examination room feeling that they had written plenty when in fact they had repeated themselves on multiple occasions, therefore gaining fewer marks than they assumed.

Learners sometimes think they have written a lengthy answer to a question and are therefore deserving of a good proportion of the marks. Unfortunately, quantity is not necessarily an indicator of quality and sometimes learners make the same point several times in different ways. Examiners are not able to award this same mark in the mark scheme a second time. The chance of repetition increases when all marks for a question (eg 10 or 20) are available in one block. It can also happen when a significant proportion of the marks are allocated to one part of a question.

This issue is most frequently demonstrated by learners who did not impose a structure on their answers. Starting each new point on a new line would assist in preventing learners from repeating a basic concept previously covered, as well as helping them assess whether they have covered enough information for the available marks.

As with the previous area for improvement ('misreading the question') writing an answer plan where points can be ticked off when made, or structuring an answer so that each point made is clearly shown, for example by underlining key points, can be of great use. This technique aids learners and makes it much clearer in the stress of the examination for learners to see which points have been made and reduce the chances of the same point being made several times. Learning Partners are encouraged to set written work and to provide feedback on written answers, looking to see that learners are able to come up with a broad range of relevant and accurate points; they should point out to learners where the same point is being made more than once.

Learners are advised to read widely. This means reading beyond course notes in order to gain a fuller understanding of the topic being studied. In that way, learners will know more and be able to produce a broader and more detailed answer in the examination. Learners may also find it helpful to read through their answers as they write them in order to avoid repetition of points.

Learning Partners should provide examination technique pointers and practice as an integral part of the course exercises. Technique as much as knowledge uptake should be developed, particularly as many learners may not have taken formal examinations for some years.

Learners produced an incoherent answer

Learners produced answers that lacked structure, digressed from the question asked and were often incoherent as a result. In many cases, there seemed to be a scatter gun approach to assembling an answer, which made that answer difficult to follow. Answers that lack structure and logic are inevitably more difficult to follow than those that are well structured and follow a logical approach. Those learners who prepare well for the unit examination and who therefore have a good and detailed knowledge commensurate with that expected at Diploma level, invariably supply structured, coherent answers that gain good marks; those learners who are less well prepared tend not to do so.

Having good written communication skills and the ability to articulate ideas and concepts clearly and concisely are important aspects of the health and safety practitioner's wider competence. Learners should be given as much opportunity as possible to practice their writing skills and are advised to practice writing out answers in full during the revision phase. This will enable them to develop their knowledge and to demonstrate it to better effect during the examination. It may help if learners ask a person with no health and safety knowledge to review their answers and to see whether the reviewer can understand the points being made.

Learners did not respond effectively to the command word

A key indicator in an examination question will be the command word, which is always given in **bold** typeface. The command word will indicate the depth of answer that is expected by the learner.

Generally, there has been an improvement in response to command words, but a number of learners continue to produce answers that are little more than a list even when the command word requires a more detailed level of response, such as 'outline' or 'explain'. This is specifically addressed in the following section dealing with command words, most commonly failure to provide sufficient content to constitute an 'outline' was noted. Failure to respond to the relevant command word in context was also a frequent problem hence information inappropriate to the question was often given.

Course exercises should guide learners to assessing the relevant points in any given scenario such that they are able to apply the relevant syllabus elements within the command word remit.

Learner's handwriting was illegible

It is unusual to have to comment on this aspect of learner answers, as experienced Examiners rarely have difficulties when reading examination scripts. However, Examiners have independently identified and commented on this as an area of concern. While it is understood that learners feel under pressure in an examination and are unlikely to produce examination scripts in a handwriting style that is representative of their usual written standards; it is still necessary for learners to produce a script that gives them the best chance of gaining marks. This means that the Examiners must be able to read all the written content.

Some simple things may help to overcome handwriting issues. Using answer planning and thinking time, writing double-line spaced, writing in larger text size than usual, using a suitable type of pen, perhaps trying out some different types of pens, prior to the examination. In addition, it is important to practise hand writing answers in the allocated time, as part of the examination preparation and revision. Today, few of us hand-write for extended periods of time on a regular basis, as electronic communication and keyboard skills are so widely used. Learning Partners should encourage and give opportunities for learners to practise this hand-writing skill throughout their course of study. They should identify at an early stage if inherent problems exist. These can sometimes be accommodated through reasonable adjustments, eg by the provision of a scribe or the use of a keyboard. Learners with poorly legible handwriting need to understand this constraint early in their course of studies in order for them to minimise the effect this may have.

NEBOSH recommends to Learning Partners that learners undertaking this qualification should reach a minimum standard of English equivalent to an International English Language Testing System score of 7.0 or higher in IELTS tests in order to be accepted onto a Diploma level programme.

For further information please see the latest version of the IELTS Handbook or consult the IELTS website: <https://www.ielts.org/about-the-test/test-format>

Learners wishing to assess their own language expertise may consult the IELTS website for information on taking the test: <http://www.ielts.org>

Learning Partners are reminded that they must ensure that these standards are satisfied or additional tuition provided to ensure accessible and inclusive lifelong learning.

Learners did not answer all the questions

It has been noted that a number of learners do not attempt all of the questions on the examination and of course where a learner does not provide an answer to a question, no marks can be awarded. Missing out whole questions immediately reduces the number of possible marks that can be gained and so immediately reduces the learner's opportunity for success. There can be several reasons for this issue: running out of the allocated time for the examination, a lack of sufficient knowledge necessary to address parts of some questions, or in other cases, some learners have a total lack of awareness that the topic covered in certain questions is even in the syllabus.

If learners have not fully studied the breadth of the syllabus they may find they are not then equipped to address some of the questions that are on a question paper. At that late stage there is little a learner can do to address this point. Responsibility for delivering and studying the full breadth of the syllabus rests with both the Learning Partner and the individual learners and both must play their part to ensure learners arrive at the examination with a range of knowledge across all areas of the syllabus.

Lack of technical knowledge required at Diploma level

In Section A, learners must attempt all questions and it was clear that some struggled with those requiring more detailed and technical knowledge. For example, it is not acceptable that at Diploma level, learners have no knowledge of the principles of good practice that underpin COSHH. Unfortunately this was often found to be the case in responses to questions.

In Section B, where learners have a choice of questions, many sought to avoid those questions with a higher technical knowledge content. For example questions on radiation, lighting and vibration. Practitioners operating at Diploma level need to be confident with the technical content of the whole syllabus and this does require a significant amount of private study, particularly in these areas of the syllabus that are perhaps less familiar to them in their own workplace situations.

Learners provided rote-learned responses that did not fit the question

It was apparent in those questions that were similar to those previously set, that the learners' thought processes were constrained by attachment to memorised answer schemes that addressed different question demands.

While knowledge of material forms a part of the study for a Diploma-level qualification, a key aspect being assessed is a learner's **understanding** of the topic and reciting a pre-prepared and memorised answer will not show a learner's understanding. In fact, if a learner gives a memorised answer to a question that may look similar, but actually is asking for a different aspect of a topic in the syllabus, it shows a lack of understanding of the topic and will inevitably result in low marks being awarded for that answer.

Command words

Please note that the examples used here are for the purpose of explanation only.

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

Explain

Explain: To provide an understanding. To make an idea or relationship clear.

This command word requires a demonstration of an understanding of the subject matter covered by the question. Superficial answers are frequently given, whereas this command word demands greater detail. For example, learners are occasionally able to outline a legal breach but do not always explain why it had been breached. A number of instances of learners simply providing a list of information suggests that while learners probably have the correct understanding, they cannot properly express it. Whether this is a reflection of the learner's language abilities, in clearly constructing a written explanation, or if it is an outcome of a limited understanding or recollection of their teaching, is unclear. It may be linked to a general societal decline in the ability to express clearly explained concepts in the written word, but this remains a skill that health and safety professionals are frequently required to demonstrate.

When responding to an 'explain' command word it is helpful to present the response as a logical sequence of steps. Learners must also be guided by the number of marks available. When asked to '**explain** the purposes of a thorough examination and test of a local exhaust ventilation system' for 5 marks, this should indicate a degree of detail is required and there may be several parts to the explanation.

Learners are often unable to explain their answers in sufficient detail or appear to become confused about what they want to say as they write their answer. For example, in one question many learners explained the difference between the types of sign, explaining colours and shapes of signs without explaining how they could be used in the depot, as required by the question.

Describe

Describe: To give a detailed written account of the distinctive features of a subject. The account should be factual without any attempt to explain.

The command word 'describe' clearly requires a description of something. The NEBOSH guidance on command words says that 'describe' requires a detailed written account of the distinctive features of a subject such that another person would be able to visualise what was being described. Learners have a tendency to confuse 'describe' with 'outline'. This means that less detailed answers are given that inevitably lead to lower marks. This may indicate a significant lack of detailed knowledge and/or a lack of ability to articulate the course concepts clearly. Learners should aim to achieve a level of understanding that enables them to describe key concepts.

Some learners see the command word 'describe' as an opportunity to fill out an answer with irrelevant detail. If a person was asked to describe the chair they were sitting on, they would have little difficulty in doing so and would not give general unconnected information about chairs in general, fill a page with everything they know about chairs or explain why they were sitting on the chair. Learners should consider the general use of the command word when providing examination answers.

Outline

Outline: To indicate the principal features or different parts of.

This is probably the most common command word but most learners treat it like 'identify' and provide little more than a bullet pointed list. As the NEBOSH guidance on command words makes clear, 'outline' is not the same as 'identify' so learners will be expected to give more detail in their answers. 'Outline' requires a learner to indicate '*the principal features or different parts of*' the subject of the question.

An outline is more than a simple list, but does not require an exhaustive description. Instead, the outline requires a brief summary of the major aspects of whatever is stated in the question. 'Outline' questions

usually require a range of features or points to be included and often 'outline' responses can lack sufficient breadth, so learners should also be guided by the number of marks available. Those learners who gain better marks in questions featuring this command word give brief summaries to indicate the principal features or different parts of whatever was being questioned. If a question asks for an outline of the precautions when maintaining an item of work equipment, reference to isolation, safe access and personal protective equipment would not be sufficient on their own to gain the marks available. A suitable outline would include the meaning of isolation, how to achieve safe access and the types of protective clothing required.

Identify

Identify: To give a reference to an item, which could be its name or title.

Learners responding to identify questions usually provide a sufficient answer. Examiners will use the command word 'identify' when they require a brief response and in most cases, one or two words will be sufficient and further detail will not be required to gain the marks. If a question asks '**identify** typical symptoms of visual fatigue', then a response of 'eye irritation' is sufficient to gain 1 mark. If having been asked to identify something and further detail is needed, then a second command word may be used in the question.

However, in contrast to 'outline' answers being too brief, many learners feel obliged to expand 'identify' answers into too much detail, with the possible perception that more words equals more marks. This is not the case and Learning Partners should use the NEBOSH guidance on command words within their examination preparation sessions in order to prepare learners for the command words that may arise.

Give

Give: To provide short, factual answers.

'Give' is usually in a question together with a further requirement, such as '**give** the meaning of' or '**give** an example in **EACH** case'. Learners tend to answer such questions satisfactorily, especially where a question might ask to 'identify' something and then 'give' an example. The learner who can answer the first part, invariably has little difficulty in giving the example.

Comment

Comment: To give opinions (with justification) on an issue or statement by considering the issues relevant to it.

For example, if learners have already calculated two levels of the exposure to wood dust and are then asked to comment on this the issues would include the levels of exposure they had found, and learners would need to give their opinion on these, while considering what is relevant. The question guides on what may be relevant for example, did it meet the legal requirements, did it suggest controls were adequate, so based on that guidance, did exposure need to be reduced further or did anything else need to be measured or considered? If learners comment with justification on each of these areas they would gain good marks in that part of question.

Few learners are able to respond appropriately to this command word. At Diploma level, learners should be able to give a clear, reasoned opinion based on fact.

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: <https://www.nebosh.org.uk/i-am/a-learner/> - from this page the document can be found by clicking on the relevant Qualification link, then on the 'Resources' tab.