

BTTG® Publicly Available Information for ISO/IEC 17065 - Product Conformity Certification

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1. Types of certification schemes

Shirley Technologies Limited, trading as BTTG®, is an Approved Body, accredited by United Kingdom Accreditation Service to ISO/IEC 17065:2012 (accreditation number 5368), to provide product conformity certification to the following UK legislation:

PPE - The UK Personal Protective Equipment Regulations

BTTG® is Approved Body 0338 for the Personal Protective Equipment Regulations (Regulation (EU) 2016/425 as brought into UK law and amended), appointed by BEIS (The Department for Business, Energy and Industrial Strategy). BTTG® is appointed for:

Module B: Type-examination

Module C2: Supervised product checks at random intervals

Module D: Quality assurance of the production process

CPR - The UK Construction Products Regulations

BTTG® is Approved Body 0338 for the Construction Products (Amendment etc.) (EU Exit) Regulations 2019, appointed by DCLG (Department for Communities and Local Government). BTTG® is appointed for:

Annex V: Test Laboratory (AVCP) System 3

Annex V: FPC Certification Body (AVCP) System 2+

Annex V: Product Certification Body (AVCP) System 1

Marine Equipment - The UK Marine Equipment Regulations

BTTG® is Approved Body 0338 for The Merchant Shipping (Marine Equipment) Regulations 2016, appointed by the Maritime and Coastguard Agency. BTTG® is appointed for the approval of Fire Protection Equipment:

Module B: UK Type Examination

Module D: Production QA

Module E: Product QA

Module F: Product Verification

Details of BTTG®'s scope for each scheme can be found on the UKAS schedule of accreditation, available from:

https://www.ukas.com/wp-content/uploads/schedule_uploads/00011/00295/5368Product%20Certification.pdf

2. Granting Certification (Initial Certification)

In general terms, product certification is granted when BTTG® concludes that:

- the product and any relevant documentation complies with the requirements of the legislation
- the requirements of any specified Designated Standard, Technical Specification or International Instrument are met
- any relevant approved guidance is complied with

Certification of products manufactured is granted when BTTG® concludes that:

- the product has been selected by BTTG® or its representatives successfully
- the selected product meets the requirements of the legislation
- any specified Designated Standard, Technical Specification or International Instrument are met
- any relevant approved guidance is complied with
- the selected product matches the original approved model or type

Certification of the client's system for controlling the production or product is granted when BTTG® concludes that:

- if relevant, the performance of the product has been established by BTTG® based on type-testing
- the production and other relevant sites have been successfully audited by BTTG®
- the manufacturer's factory production control system ensures conformity of the manufactured product with the declared performance or approved model
- any nonconformities are cleared to BTTG®'s satisfaction

Certificate validity

- PPE Module B Certificates are issued with a validity of a maximum of 5 years.
- PPE Module C2 approval reports are issued with a validity of 1 year.
- PPE Module D Certificates are issued with a validity of 3 years.
- CPR System 1 and 2+ Certificates are issued with no expiry date.
- Marine Equipment Module B Certificates are issued with a validity of a maximum of 5 years.

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- Marine Equipment Module D and E Certificates are issued with a validity of 3 or 5 years.
- Marine Equipment Module F Certificates are issued for each tested lot or batch, and with no expiry date.

CPR System 3 test reports are issued by BTTG®'s testing laboratories, and accredited to ISO/IEC 17025. The client (the manufacturer) is responsible for ensuring that they have the necessary testing in order to UKCA mark their product.

3. Refusing Certification

The decision to refuse certification is made by one of BTTG®'s Certification Managers. For product certification and product selection and testing, this may occur when:

- the product does not meet the requirements of the legislation or the relevant standards and specifications
- the product no longer conforms with the original approved model
- the specified technical documentation does not meet the requirements of the legislation or the relevant standards and specifications

For factory production control systems, this may occur when:

- BTTG® concludes that the quality system cannot ensure that the production conforms with the approved or declared model

4. Maintenance of Certification

For any major nonconformity or other situation that may lead to suspension or withdrawal of certification, one of BTTG®'s Certification Managers will determine whether certification can be maintained.

For product certification

Certification is maintained provided that the client complies with the conditions of certification:

- The address of the client is that which appears on the certificate
- The certificate has not been transferred or assigned to another organisation
- The certificate has not been lost, duplicated or altered without the authorisation of BTTG®
- The client is not promoting certification for products or services other than those covered by the certificate
- The client is not claiming compliance with other standards through the use of the certificate or audit report other than that appearing on the certificate

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- Certificates or promotional materials associated with them are not promoting erroneous or misleading information
- The client must investigate complaints associated with the certified products. Records of such complaints, and actions taken, must be kept by the client and made available to BTTG® when requested
- Production is limited to the site(s) notified to BTTG® at the time of certification
- Any change to the product or quality manual / quality plan shall be immediately notified to BTTG®
- For Category III PPE, the client must maintain Module C2 or Module D approval with an Approved Body

Renewal of product certification must be requested by the manufacturer before the Certificate expires. If required, declarations and relevant retesting must be submitted.

For factory production control systems

Surveillance activities include on-site auditing of the client's management system. Surveillance audits are on-site audits, but are not necessarily full system audits.

Certification is maintained provided that the client complies with the conditions of certification:

- The address of the client is that which appears on the certificate
- The certificate has not been transferred or assigned to another organisation
- The certificate has not been lost, duplicated or altered without the authorisation of BTTG®
- The client is not promoting certification for products or services other than those covered by the certificate
- The client is not claiming compliance with other standards through the use of the certificate or audit report other than that appearing on the certificate
- Certificates or promotional materials associated with them are not promoting erroneous or misleading information
- The client must permit ongoing surveillance and access to documentation and records, and access to the relevant equipment, location(s), area(s), personnel and client's subcontractors
- The client must investigate complaints associated with the certified products or services. Records of such complaints, and actions taken, must be kept by the client and made available to BTTG® when requested
- The client must allow participation of observers during surveillance audits when requested

For factory production control certificates with an expiry date, a re-assessment of the system must be completed by BTTG® before the certificate can be re-issued. This re-assessment audit will normally be conducted at least 3 months before the certificate expiry date to allow for closure of any corrective actions and the reissue of the certification.

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5. Suspension of Certification

Suspension of certification occurs when BTTG® believes that:

- the product no longer meets the requirements of the legislation or relevant standards and specifications
- misuse of the certification has seriously breached the conditions of certification
- the client's quality system has persistently failed to meet certification requirements
- the client has not enabled surveillance audits or recertification audits to be conducted at the prescribed intervals
- the certified client has requested the suspension of a certification
- there is a dispute over certificate ownership

The client will be required to:

- Cease promoting their certification on advertising material
- Submit corrective action, if appropriate
- If relevant, allow access to BTTG®'s audit team to conduct an investigatory audit, if this is deemed appropriate, prior to lifting the suspension

Suspension is limited to a maximum period of 6 months before certification withdrawal commences. If certification is suspended, the client's certification is temporarily invalid:

- Certified product must not be sold or released.
- The client must discontinue its use of all advertising matter that contains any reference to the certification. BTTG® will restore the suspended certification if the issue that has resulted in the suspension has been resolved.

Where evidence is submitted or audits performed, one of BTTG®'s Certification Managers will determine whether certification can be reinstated, or whether the scope of certification or product performance or classification should be limited or reduced, or certification should be withdrawn.

6. Withdrawing Certification

BTTG® may withdraw certificates in the following cases:

- The client informs BTTG® in writing that the certification is no longer required, or that they do not wish to maintain the validity of the Certificate;
- Wind-up of the client without a legal successor;
- Unauthorised use of the Certificate;
- The client is in breach of the certification agreement;
- The product no longer conforms to the original approved model;
- Production has been moved to a different production site without the approval of BTTG®;
- The client does not accept scheduled surveillance or re-assessment audits;
- A serious non-conformity reoccurs in two consecutive audits;
- Non-conformities raised in the audits are not corrected within the time limit prescribed by BTTG®;
- The maximum period of a suspension has ended and corrective actions required were not carried out.

Complaints can also result in certification withdrawal and will be judged by one of BTTG®'s Certification Managers on a case by case basis.

Upon withdrawal of certification, the client must discontinue its use of all advertising matter that contains any reference to the certification.

7. Expanding the scope of Certification

A client wishing to expand the scope of certification must submit an application with details of the requested extension. BTTG® will review the application and any submitted documentation. An additional audit may be necessary, or it may be combined with a surveillance audit. Additional product tests may be necessary.

8. Reducing the scope of Certification

The scope of certification may be reduced in the following circumstances:

- At the client's request
- Following suspension of the certification
- If the client has persistently or seriously failed to meet the requirements for those parts of the scope
- If the product no longer meets the declared or tested performance or classification

9. BTTG®'s fees and status

BTTG® is an independent testing and certification organisation, owned by its management and staff. Fees are charged for all certification work.

10. Rights and duties of applicants and clients

For certification of products, the applicant must not have submitted the same product for certification to any other Approved Bodies.

For certification of product and production quality control systems for specific products, the applicant must not have applied to another Approved Body for approval of the system for those products.

PPE Module B

Clients must place BTTG®'s name, approved body number and address on the user information for any certified product.

Clients must include BTTG®'s name, approved body number and address on their Declaration of Conformity.

PPE Module C2 and D

Clients must place BTTG®'s approved body number on the PPE, beside the UKCA mark, for PPE manufactured during the validity of the certification.

Clients must place BTTG®'s name, approved body number and address on the user information for any certified product. Clients must include BTTG®'s name, approved body number and address on their Declaration of Conformity.

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CPR System 1, 2+ and 3

Clients must include BTTG®'s name and approved body number on the Declaration of Performance. Clients must place BTTG®'s approved body number on the CE label.

Marine Equipment Module B

Clients must include BTTG®'s name, approved body number and address on their Declaration of Conformity.

Marine Equipment Module D/E

Clients must place BTTG®'s approved body number on the marine equipment, beside the Red Ensign mark, for marine equipment manufactured during the validity of the certification.

Clients must include BTTG®'s name, approved body number and address on their Declaration of Conformity.

Marine Equipment Module F

Clients must place BTTG®'s approved body number on the marine equipment, beside the Red Ensign mark, for the batches or lots of marine equipment manufactured listed on the Certificate.

Clients must include BTTG®'s name, approved body number and address on their Declaration of Conformity.

11. The use of BTTG®'s name and certification mark and approved body number

For the PPE, CPR and Marine Equipment certification schemes, BTTG®'s certification mark is our approved body number, 0338. Information and requirements for the use of BTTG®'s name and approved body number is included in our Certification Terms and Conditions, which can be found on our application forms, questionnaires and certificates for each scheme.

General rules

- The client must only make claims consistent with the scope of certification,
- The client must not make any misleading or unauthorised comments regarding the certified product or the certification body.
- The client must upon suspension, withdrawal, or termination of certification discontinue the use of all advertising matter that contains any reference thereto and take action to return the certificate to BTTG®.

Use of the Approved Body Number

The Approved Body Number must only be used:

- In direct association with products or systems covered by the certification.
- by holder(s) of the certification.
- Use of BTTG® Approved Body Number does not extend to other companies which are:
 - part of the same corporate group as the Certificate holding company: or
 - named in a Certificate, for example as a supplier.
- Particular care must always be taken to avoid the association of the BTTG® Approved Body Number with other products or systems or schemes and with claims or information not contained in the BTTG® document.

UK Personal Protective Equipment Regulations

The UK Conformity Mark consists of the letters 'UKCA', in the form given in Annex II of Regulation (EC) No 765/2008 as brought into UK law and amended, followed by the number of the approved body involved in production control monitoring (Module C2/D).

UK Construction Products Regulations

The UK Conformity Mark consists of the letters 'UKCA', in the form given in Annex II of Regulation (EC) No 765/2008 as brought into UK law and amended, followed by the last two figures of the year in which the mark was first affixed and BTTG®'s approved body number.

UK Marine Equipment Regulations

The UK Conformity Mark consists of the Red Ensign mark, followed by the number of the approved body involved in Module D, E or F and the year, or the last two figures of the year, in which the mark was affixed.

12. Procedures for complaints and appeals

Complaints

A complaint is any formal expression of dissatisfaction raised with BTTG® in regard to its certification activities, its clients, or its services to clients.

All such complaints will be processed using BTTG®'s procedure for complaints management. If the complaint is not in writing, confirmation will be requested. Complaints will be acknowledged in writing, and investigated. The complainant will be advised of the outcome of the investigation. Complainants have the right of appeal, when a complaint is not resolved to the satisfaction of the complainant.

BTTG® will determine, together with the complainant and the certified client, whether and, if so to what extent, the subject of the complaint and its resolution is made public.

Appeals

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An appeal is a formal review process when a client disagrees with a certification decision made by BTTG®, either to certify or not to certify.

Appeals must be received within 6 weeks of the complainant being advised of the outcome of the investigation into their complaint. If the appeal is not in writing, confirmation will be requested. One of BTTG®'s Certification Managers will review the appeal. If it is rejected, the appellant will be informed of the reasons.

If the appeal is rejected, the complainant may seek a further appeal. An Appeals Panel will be appointed, including BTTG®'s Managing Director and a representative from BTTG®'s Certification Management Committee, which will review the appeal.

Representatives from BTTG®, technical experts, and the appellant will be invited to attend, as deemed necessary. The Appeals Panel will make a decision and set out any appropriate corrective action.

13. **Requests for information**

BTTG® will provide, upon request, information about:

- The geographical areas in which it operates;
- The status of a given certification;
- The name, standard, scope and geographical location (city and country) for a specific certified client.

Requests should be made to BTTG® using the contact details listed above.

14. **Information provided to third parties**

The Regulations for which BTTG® is appointed impose requirements on Approved Bodies for the provision of, or access to, information regarding their certification activities, and the results and conclusions of those activities.

UK Personal Protective Equipment Regulations

Any technical documentation and certification may be accessed by the UK's competent authority, i.e. BEIS (The Department for Business, Energy and Industrial Strategy).

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BTTG® will inform BEIS of any certificates or quality system approvals issued or extended, and any refusal, restriction, suspension or withdrawal of a certificate (Module B) or approval decision (Module C2 or D).

BTTG® will inform other UK approved bodies of any type-examination certificates and extensions or quality system approvals which it has refused, withdrawn, suspended or otherwise restricted, and will provide UK approved bodies carrying out similar conformity assessment activities covering the same kinds of PPE with relevant information on issues relating to negative conformity assessment results.

On request, BTTG® will provide other UK approved bodies with information of type-examination certificates and extensions or quality system approvals which it has issued, and will provide UK approved bodies carrying out similar conformity assessment activities covering the same kinds of PPE with relevant information on issues relating to positive conformity assessment results.

On request, the UK's competent authority BEIS and the other UK approved bodies may obtain a copy of type-examination certificates.

Following a reasoned request, BTTG® may provide other UK approved bodies with a copy of the technical file and the reports of the examinations and tests conducted.

UK Construction Products Regulations

BTTG® will inform the UK's competent authority, DCLG (Department for Communities and Local Government) of any refusal, restriction, suspension or withdrawal of certificates.

BTTG® will inform the other UK approved bodies with relevant information on issues relating to negative and, on request, positive results from assessments and/or verifications.

UK Marine Equipment Regulations

All marine Equipment certification decisions and information are provided to the UK's competent authority, the Maritime and Coastguard Agency, which will publish a list of approved equipment.

BTTG® will, on request, provide the Maritime and Coastguard Agency, and the other UK approved bodies with the

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relevant information concerning UK type-examination (Module B) certificates and additions issued and withdrawn.

The other UK approved bodies may obtain a copy of the UK type-examination (Module B) certificate.

BTTG® will, on request, provide the Maritime and Coastguard Agency and the other UK approved bodies with the relevant information concerning quality-system (Module D/E) approvals issued and withdrawn.