	REFERENCE:	GEN - P - 22	ISSUE:	02
	TITLE:	Summary of evaluation procedures for public access		

Contents


1	Introduction	1
2	Scope of Services	1
2.1	Scope of Accreditation by UK Regulation	2
2.1.1	PER & SPVR.....	2
2.1.2	RCR.....	2
2.1.3	MR.....	2
3	Evaluation of Conformity	2
3.1	Use of Standards & Alternative Solutions	3
3.2	Testing – Witnessing & Laboratories.....	3
4	Complaints and Appeals	4

1 Introduction

1. This document describes the scope of HPi-CEproof's accredited certification services and the methods used to evaluate the compliance of clients' products.

2 Scope of Services

2. HPi-CEproof conducts all its work to a quality management system (QMS) that is accredited by UKAS to ISO 17020.
3. All accredited services relate to certification of products to the following UK Regulations:
 - a) Recreational Craft Regulations (RCR) SI 2017 no 737
 - b) Pressure Equipment (Safety) Regulations 2016 (PER) SI 2016 no 1105
 - c) Simple Pressure Vessels (Safety) Regulations 2016 (SPVR) SI 2016 no 1092
 - d) Supply of Machinery (Safety) Regulations (MR) SI 2008 no 1597
4. All the above legislation may be downloaded from the UK Government's website using the following links:
 - a. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938307/Guide-to-recreational-craft-regulations-2017.pdf
 - b. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/640795/nlf-pressure-equipment-regulations-2016-guidance.pdf
 - c. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/640799/nlf-simple-pressure-vessels-2016-guidance.pdf

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	TITLE:	Summary of evaluation procedures for public access		

- d. <https://www.legislation.gov.uk/ukxi/2008/1597/contents/made>
5. The UK regulations are, in terms of their *essential requirements* and *conformity assessment procedures*, a direct copy of EU product directives. It is pertinent, therefore, to review EU documentation regarding these 2 aspects:
- a. Comprehensive guidance on the implementation of EU product Directives can be found in the EU Commission's official guidance document referred to as *The Blue Guide* which can be downloaded from here:
<http://ec.europa.eu/DocsRoom/documents/18027/>
 - b. Each of the above Directives has a menu of *Conformity Assessment Modules* which are defined in detail in EU Implementing Decision 2014/768/EU which can be downloaded from here:
https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:JOL_2014_315_R_0004
6. The Conformity Assessment Modules define the evaluation required by an Approved Body in UK (Notified Body in Europe). For example, for some modules require only witnessing of pressure or stability testing. For other modules a full design review and monitoring of production is required. Each Directive defines when each module may be applied.
7. HPi-CEproof is not, however, appointed to certify under all conformity assessment modules for all product types within the scope of the directives. The following sections breakdown the scope of HPi-CEproof's accredited work.

2.1 Scope of Accreditation by UK Regulation

2.1.1 PER & SPVR

8. All product types
9. All conformity assessment modules

2.1.2 RCR

10. All product types, including noise and engine exhaust emissions.
11. All conformity assessment modules including *Post Construction Assessment (PCA)*

2.1.3 MR


12. HPi-CEproof is appointed as a Notified Body for just one of the products listed in annex IV of the Directive:

17: Devices for the lifting of persons or of persons and goods involving a hazard of falling from a vertical height of more than three metres.

13. Conformity assessment modules: B (Type Approval)

3 Evaluation of Conformity

14. All the above Regulations set goals in the form of *Essential Requirements*.

	REFERENCE:	GEN - P - 22	ISSUE:	02
	TITLE:	Summary of evaluation procedures for public access		

15. The British Standards Institute (BSi) in conjunction the International Standards Organisation (ISO) and the European Standard Organisation (CEN) has provided the industry with a library of standards that provide a ‘default’ means of measuring conformity of products with the Essential Requirements. In the UK these are known as ‘designated standards’. (They are known as ‘harmonised standards’ in Europe but they are the very same standards in UK and Europe).
16. More details on Designated Standards can be found on the UK Government’s website at: <https://www.gov.uk/guidance/designated-standards>

3.1 Use of Standards & Alternative Solutions


17. In rare cases, designated standards expressly chosen to support the regulations, are mandatory and HPi-CEproof will ensure that these are applied.
18. Where a designated standard is not mandatory, it is for the manufacturer or client to decide how to measure conformity with the goals of the Regulation. Designated standards carry a *presumption of conformity*, meaning that, if the standard is properly applied, the product must be presumed by everyone, including Approved Bodies, to conform with the related Essential Requirements of the Regulations¹.
19. So, where clients apply designated standards, HPi-CEproof will, within the scope of the chosen conformity assessment module, ensure that the standard has been properly applied.
20. Where any means other than designated standards have been chosen by the client, HPi-CEproof will:
- a) Consider whether the alternative solution offers *equivalent safety* to an appropriate designated standard, or if there is no appropriate harmonised standard:
 - b) Conduct a risk assessment of the product to evaluate whether the goals set in the Regulations have been met.
21. In either case, above, HPi-CEproof will then ensure the alternative solution has been properly applied.

3.2 Testing – Witnessing & Laboratories

22. Where the conformity assessment module applied depends upon the result of a critical test², HPi-CEproof will need to be in attendance to witness the test, unless the testing is performed by a laboratory which is formally accredited to conduct those services.

¹ Note that all Regulations include a ‘Safeguard Clause’ that recognises the theoretical possibility that an unforeseen product could comply with an approved standard but still be unsafe. In such cases, authorities have the right to bar the product from the market and HPi-CEproof would be obliged to seek guidance from the authorities if it has reason to believe a product compliant with approved standards was unsafe.

² Where the Approved Body is certifying a specific unit of production (eg Module G or PCA) and compliance cannot be certain without the successful completing of a test, then the test is ‘critical’. Where the module is based on type approval, some tests are performed only to ensure ‘conformity to type’ (eg a system leak test) and these are not deemed critical.

	REFERENCE:	GEN - P - 22	ISSUE:	02
	TITLE:	Summary of evaluation procedures for public access		

4 Complaints and Appeals

23. All Approved Bodies are required to have a documented procedure for Complaints and Appeals in case a client disagrees with an Approved Body's findings or has any other grievance. HPi-CEproof's procedure is available upon request.
24. HPi-CEproof has a Board of Governors, whose members are unpaid and drawn from industry to oversee that HPi-CEproof's operations are consistent, impartial and in-line with industry expectations. Any grievances that cannot be resolved between HPi-CEproof and client may be taken to the Board whose members have an explicit mandate to take any concerns to the authorities that appointed HPi-CEproof.