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HKIAS Supplementary Criteria No. 1

Consumer Product Inspection

0 Introduction

- (a) This document serves to clarify and supplement the requirements of HKIAS 003:2017 for the accreditation of an inspection body performing consumer product inspection. This criteria document should be read in conjunction with HKIAS 003:2017 and other relevant criteria documents.
- (b) Accreditation is granted for specific stages of inspection (e.g. pre-production, during production, pre-shipment, etc.) for specific products and using specific inspection methods. Accreditation for generic inspection methods covering a broad range of different designs for the same types of product may also be granted. The products covered by the generic inspection method will be detailed in the scope of accreditation.

1 Scope

(No additional explanation)

2 Normative references

(No additional explanation)

3 Terms and definitions

The term “shall” is used throughout this document to indicate those provisions which are mandatory. The term “should” is used to indicate guidance which, although not mandatory, is provided by HKAS as a recognised means of meeting the requirements.

4 General requirements

4.1 Impartiality and independence

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- 4.1.1 The inspection body shall implement an effective preventive system to safeguard against any threat or inducement which may affect the inspection results obtained by its personnel. The system may include a combination of the following elements:
- a. Job rotation for inspectors;
 - b. Arranging an unannounced on-site observation by the inspection body's designated person (e.g. an auditor, a supervisor or a person who is familiar with the inspection method and procedure) to check the performance of the inspector when he/she is performing inspection. The external organisation (e.g. factories, warehouses, etc.) involved shall be requested to cooperate to ensure the effectiveness of the unannounced on-site observation. For example, upon the arrival of the inspection body's designated person at the factory's entrance, the factory shall not inform the inspector working on-site and shall fully cooperate with such designated person. Such cooperation of the external organisation should be sought prior to commencing the inspection;
 - c. Taking disciplinary action against inspectors who are practising impropriety and/or reporting to an appropriate regulatory authority for follow-up;
 - d. Asking inspectors to record their inspection activities and findings in detail;
 - e. Asking the representative of the external organisation at which the inspection is performed to sign to acknowledge the inspection body's policy on improper influence before the inspection is commenced. After completion of the inspection activities, the representative of the external organisation may be asked to explicitly declare in the inspection record whether the concerned inspector(s) has/have requested for or accepted any benefit in whatever form;

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- f. Obtaining and reviewing feedback from the external organisation on the conduct and performance of the inspector(s);
- g. Providing immediate feedback channel for the inspector(s) to report attempt of the representative of the external organisation to exert improper influence. After completion of the inspection activities, the inspector shall explicitly declare in the inspection record whether the representative of the external organisation has offered or attempted to offer any advantage in whatever form;
- h. Considering reporting to an appropriate regulatory authority the improper influence that the external organisation had attempted to exert on its inspector(s). Where the law allows, the inspection body may draw its client's attention to such matter;
- i. If the number of samples to be inspected is huge and/or the samples to be inspected are complicated, the inspection body should consider using more inspectors working for a single day instead of using fewer inspectors working for several days to avoid the need for overnight stay near the premises at which inspection activities are performed;
- j. Where overnight stay is unavoidable, the inspector(s) should avoid contacting the representative of the external organisation after working hours. Where situation allows, the inspector(s) should stay far away from the premises where inspection activities are performed and should not inform the external organisation of the place of stay; and
- k. In the document setting out the relationship between the inspector(s) and the representative of the external organisation, explicitly state that the decision made by the inspector(s) is subject to review by the inspection body and that the opinion of the external organisation, if any, may be taken into consideration during the review.

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4.1.2 If impropriety still occurs despite implementation of the preventive system, the inspection body shall investigate the root cause of the problem and take appropriate action to strengthen its system.

4.2 Confidentiality

(No additional explanation)

5 Structural requirements

(No additional explanation)

6 Resource requirements

6.1 Personnel

6.1.1 HKIAS operates an approved inspector system and an approved signatory system for consumer product inspection. The nominated inspector and nominated signatory shall hold a higher diploma in engineering, technology or science discipline or a higher academic qualification issued by a higher education institute in Hong Kong. If the nominated inspector or nominated signatory holds an academic qualification which was conferred by an educational institution outside Hong Kong, the inspection body shall provide supporting evidence to substantiate that such qualification is equivalent to or higher than the minimum requirement stated above.

6.1.2 The nominated inspector and nominated signatory shall have at least three and five years of related work experience respectively.

6.1.3 A structured training program for inspectors shall cover the following aspects:

- a. Requirements of the inspection body's management system and code of conduct;
- b. Principle and practice of inspection;
- c. Inspection methods and procedures, sampling methods and procedures and their selection;
- d. Acceptance criteria and classification of defects;

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- e. Interpretation of inspection requirements, standards and product specifications for the products to be inspected;
- f. Statistical techniques and sampling plans;
- g. Identification of samples and sub-samples;
- h. Preservation of samples and environmental condition requirements for sampling and inspections;
- i. Principle and operation of relevant equipment, including automatic ones. The criteria for their selection, including accuracy requirements for a given inspection. Where it is necessary to use equipment not under the control of the inspection body to conduct inspection or sampling, the inspectors shall be trained to conduct the necessary on-site verification checks;
- j. Understanding the factors affecting the accuracy of inspection results, including those contributed by the sampling and inspection method, the equipment and competence of the inspectors;
- k. Recording of the inspection details and results;
- l. Checking of inspection results;
- m. Drawing conclusion based on inspection results; and
- n. Introduction to the manufacturing technology of the products to be inspected, including the quality control and quality assurance practice, and the characteristics of the products.

6.2 Facilities and equipment

- 6.2.1 For measuring equipment which has significant effect on the inspection results, the inspection body should use those under its control to perform inspection. Where this is impracticable, the inspection body may use equipment not under its control provided that the inspector has verified that the equipment is suitable for the purpose before use, including its functionality, measurement range, accuracy and calibration status. The inspection body shall ensure that records of verification are kept, standard verification procedures are provided and the inspectors are trained to conduct the verification check. Where necessary, the inspector shall be provided with the necessary reference standard to conduct the verification check.

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6.2.2 To ensure that the necessary equipment is available on-site, the inspection body shall consult beforehand the responsible person of the premises where inspection activities take place to confirm whether suitable and adequate equipment is available.

6.2.3 When an inspector brings his own equipment, he shall perform a verification check on arrival at the site to ensure that its functions have not been affected by transportation. Such verification check shall be recorded.

6.3 Subcontracting

(No additional explanation)

7 Process requirements

7.1 Inspection methods and procedures

7.1.1 The inspection body shall provide documented work instructions containing the following information, whenever applicable, to each inspector prior to commencing any inspection activity:-

- a. What are to be inspected, including the stage of inspection (e.g. pre-shipment), identification of the product, the quantity of the product, the premises where inspection activities are performed, the contact person of the premises, the inspection time/date and any other relevant general information;
- b. The sampling method, including the sampling plan and the sample size;
- c. The inspection method, including features of the product to be examined;
- d. The equipment to be used;
- e. Instruction for recording inspection finding;
- f. Detail and quantity of any production samples to be drawn and sent back to the inspection body for further examination or testing;
- g. The method for affixing identification mark to each inspection sample and sub-sample, where necessary;

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- h. The acceptance criteria, including the workmanship standard, classification of observed defect and client provided reference sample, shall be provided to the inspector. The inspection body shall have a system for identification of the reference sample to avoid confusion; and
- i. Any special requirements and instructions relevant to the inspection, e.g. instruction manual for measuring equipment to be used, environmental condition requirement and preservation of the collected samples.

7.1.2 Before carrying out an on-site inspection, the inspector shall brief the responsible person of the external organisation on the purpose and procedures of the inspection and solicit his cooperation.

7.2 Handling inspection items and samples

7.2.1 Where there is a need to identify the exact source or origin of an individual sample, the inspection body should assign a unique code to each sample and record the details of its origin, e.g. the carton number, the production line number, the time and date when the sample is taken from the production line, etc.

7.2.2 Where it is necessary to send the sample to a laboratory for testing or retain the sample for reference, the inspection body shall ensure that it is uniquely identified to avoid confusion.

7.2.3 Where there is a need to keep the inspected samples, e.g. to show what defect has been observed, consent of the client shall be obtained. Procedures for disposal of the retained samples shall also be agreed with the client. Before disposal, the samples may have to be destroyed to an extent such that the confidentiality of the client's information is maintained.

7.3 Inspection records

7.3.1 To facilitate future retrieval of records, it may be useful to include the report number, or an equivalent identification number on every document relating to that inspection.

7.3.2 Supplementary information required for the interpretation of the recorded data shall also be kept.

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7.4 Inspection reports and inspection certificates

7.4.1 Before issuing the final inspection result to the client, the inspection body shall ensure that the following items have been properly checked:

- a. The instructions of the client of the inspection body have been accurately and comprehensively executed;
- b. Proper inspection and sampling methods have been used;
- c. The inspection has been performed by qualified inspectors;
- d. The measuring equipment used is suitable and properly checked and calibrated;
- e. Samples have been obtained according to the sampling plan, including the location, size, environmental condition, etc.;
- f. Samples and where necessary, sub-samples have been properly identified;
- g. Data transfer, calculation and conclusion have been correctly made;
- h. The inspection findings have been properly recorded and all records are traceable;
- i. All the necessary data required for reaching the conclusion, including results from laboratory or subcontractor, have been obtained;
- j. Each observed defect has been properly classified;
- k. The conclusion has been properly derived from the inspection findings; and
- l. Information included in each report or certificate is correct.

The inspection body shall maintain record to authenticate that the results have been properly checked.

7.5 Complaints and appeals

(No additional explanation)

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7.6 Complaints and appeals process

(No additional explanation)

8 Management system requirements

(No additional explanation)