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HKIAS Supplementary Criteria No. 1

Consumer Product Inspection

1 INTRODUCTION

- 1.1 This document serves to amplify and interpret the requirements of HKIAS 003 for the accreditation of consumer product inspection. This criteria document needs to be read in conjunction with HKIAS 003 and other relevant criteria documents. The following sections set out specific technical criteria for selected clauses of HKIAS 003. This document also provides guidance for selected aspects. For areas not covered in this document, the principles stipulated in HKIAS 003, HKAS 002 and other relevant supplementary criteria documents shall apply.
- 1.2 Accreditation is granted for specific types of inspection (e.g. pre-production, during production, pre-shipment, etc.) for specific products and using specific inspection methods. Inspection bodies may apply for accreditation for one or more inspection method and one or more product type. 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.

2 TERMS AND DEFINITIONS

- 2.1 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.

3 PERSONNEL (HKIAS 003 Clause 6.1)

- 3.1 HKIAS operates an approved inspector system and an approved signatory system for consumer product inspection. The minimum academic qualification for a nominee for approved inspector and approved signatory shall be a higher diploma in engineering, technology or science discipline issued by a higher education institute in Hong Kong or equivalent qualification.
- 3.2 Nominee for approved inspector and approved signatory shall have at least three and five years of related work experience respectively. In exceptional circumstances, extensive experience in consumer product inspection, say more than 10 years, in lieu of academic qualification may be accepted.

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- 3.3 For nominee holding an academic qualification conferred by an educational institution outside Hong Kong, the inspection body shall provide supporting evidence to substantiate that such qualification is equivalent to or above the minimum requirement stated above.
- 3.4 To safeguard against any threat or inducement on the inspection body's personnel which may affect the inspection results, the inspection body shall implement an effective preventive system. 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. auditor, supervisor or person 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 and legal sanction against inspectors practising impropriety;
 - d. Asking the inspector to record the inspection activities and the findings in detail;
 - e. Asking the representative of the external organisation to sign to acknowledge the inspection body's policy on improper influence before the inspection is started. After completion of an inspection, the representative of the external organisation may be asked to explicitly declare in the inspection record whether the inspector has requested or given any benefit in whatever form;
 - f. Obtaining and reviewing feedback from the external organisation on inspector's conduct and performance;
 - g. Providing immediate feedback channel for inspector to report attempt of the representative of external organisation to exert improper influence. After completion of an inspection, 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;

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- h. Considering taking legal sanction against the external organisation attempting to exert improper influence. Where necessary, the inspection body should bring the matter to the attention of its client and make resolution with its client;
- 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 where inspection activities take place;
- j. Where overnight stay is unavoidable, the inspector should avoid contacting the representative of the external organisation after working hours. Where situation allows, the inspector should also stay far away from the premises where inspection activities take place and not to inform the external organisation of their place of stay; and
- k. In the document setting out the relationship between the inspector and the representative of the external organisation, explicitly state that the decision made by the inspector 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.

Inspection bodies are reminded that if impropriety still occurs despite implementation of their preventive system, they shall investigate the cause of the discrepancy and strengthen their system.

3.5 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;
- 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;

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- 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.

4 FACILITIES AND EQUIPMENT (HKIAS 003 Clause 6.2)

4.1 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.

When sufficient confidence has been established on the fitness for purpose of the equipment provided by the external organisation, equipment verification process may be simplified. For example, when:

- a. the inspection body has a long term working relationship with the external organisation and previous verification records confirmed that specific equipment provided by the external organisation has a stable and consistent performance over an extended period of time;

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- b. periodic verification is carried out to monitor the reliability of the equipment, and the verification result confirmed the continually stable and consistent performance of the equipment. Records of such verification are documented and analysed;
- c. the equipment has been calibrated by a competent organisation (e.g. accredited calibration laboratory) to provide the necessary measurement traceability; and
- d. the inspector has been trained to understand the information included in calibration report or certificate to determine the relevance and adequacy of the calibration.

Justification for any simplification to the equipment verification process or the continuation of any simplified verification regime shall be documented.

- 4.2 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.
- 4.3 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.

5 INSPECTION METHODS AND PROCEDURES (HKIAS 003 Clause 7.1)

- 5.1 Documented work instructions containing the following information shall be provided to each inspector prior to commencing inspection:-
 - a. What are to be inspected, including the type of inspection (e.g. pre-shipment), identification of the product, the quantity of the product, the premises where inspection activities are to take place, 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;

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- g. The method for affixing identification mark to each inspection sample and sub-sample, where necessary;
 - 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.
- 5.2 The samples selected for inspection shall be representative of the batch of product.
- 5.3 Where the sampling is labour intensive, the inspection body shall make prior agreement with the external organisation to ensure that sufficient manpower is available to assist the inspector.
- 5.4 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.

6 HANDLING INSPECTION ITEMS AND SAMPLES (HKIAS 003 Clause 7.2)

- 6.1 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.
- 6.2 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.
- 6.3 Where there is a need to keep the inspected samples, e.g. to show what defect has been observed, consent of the owner shall be obtained. Procedures for disposal of the retained samples shall also be agreed with the owner. Before disposal, the samples may have to be destroyed to an extent such that the confidentiality of the client's information is maintained.

7 INSPECTION RECORDS (HKIAS 003 Clause 7.3)

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- 7.1 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.
- 7.2 Supplementary information required for the interpretation of the recorded data shall also be kept.

8 INSPECTION REPORTS AND INSPECTION CERTIFICATES (HKIAS 003 Clause 7.4)

- 8.1 Before issuing the final inspection result to the client of the inspection body, 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 checker shall sign on the record sheet to authenticate that the results have been properly checked. Other alternative means of authentication providing equivalent assurance is also acceptable.