



Department for
Business, Energy
& Industrial Strategy

Office for Product
Safety & Standards



Supporting better product recalls

Code of practice
on consumer
product safety
related recalls
and other
corrective actions



PAS 7100:2018
Part I: Business
Part II: Regulators

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Contents

Foreword	ii
Introduction.....	iv
Part I – Code of practice for business	1
1 Scope.....	1
2 Terms and definitions	1
3 Regulatory context	4
4 Advance planning for corrective actions	4
5 Managing a corrective action	12
Part II – Code of practice for Regulators	18
1 Scope.....	18
2 Regulatory context	18
3 Effective regulatory arrangements	19
4 Support to business to develop a PSIP.....	20
5 Support to business incident investigation and risk assessment.....	21
6 Support to business to implement corrective action	21
7 Support businesses to review/ revise PSIP	22
Annexes	
Annex A (Informative) Regulatory context for corrective action required of businesses.....	23
Annex B (Informative) – Risk assessment methodologies.....	25
Annex C (Informative) Product safety incident plan (PSIP) assessment checklist	35
Annex D (Informative) Checklist of actions prior to launching a corrective action.....	37
Annex E (Informative) Checklist for conclusion of corrective action	38
Annex F (Informative) Checklist for review of corrective action process	39
Annex G (Informative) Corrective action announcements – Guidance on content and layout	40
List of tables	
Table B1 – Hazards, typical injury scenarios and typical injuries.....	27
Table B2 – Consumers	32
Table B3 – Severity of injury	32
List of figures	
Figure 1 – Typical corrective action sequence	12
Figure G1 – Example product recall notification, recommended content and display features.....	40
Figure G2 – Example of a model direct corrective action notification	41
Figure G3 – Examples of recall notification using social media	42

Foreword

Development of this PAS was sponsored by the Department for Business, Energy and Industrial Strategy (BEIS) following a recommendation of the Working Group on Product Recalls and Safety (WGPRS). Its development was facilitated by BSI Standards Limited and it was published under licence from The British Standards Institution. It came into effect on 7th March 2018.

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- Association of Manufacturers of Domestic Appliances (AMDEA)
- Association of Chief Trading Standards Officers (ACTSO)
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- British Toy and Hobby Association (BTHA)
- BSI Consumer and Public Interest Network
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- London Fire Brigade
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A PAS is a document that standardizes elements of a product, service or process. PASs are usually commissioned by industry leaders – be they individual companies, SMEs, trade associations or government departments. A PAS responds to emerging needs within a sector, through a collaborative and robust process of knowledge sharing and consensus building, around the correct solutions. A PAS offers a rapid route to standardization, typically taking nine to twelve months from launch to publication. This PAS is not to be regarded as a British Standard. It will be withdrawn upon publication of its content in, or as, a British Standard. A PAS can be considered for further development as a British Standard, or constitute part of the UK input into the development of a European or International Standard.

Use of this document

As a code of practice, this PAS takes the form of guidance and recommendations. It should not be quoted as if it were a specification and particular care should be taken to ensure that claims of compliance are not misleading.

Any user claiming compliance with this PAS is expected to be able to justify any course of action that deviates from its recommendations.

It has been assumed in the preparation of this PAS that the execution of its provisions will be entrusted to appropriately qualified and experienced people, for whose use it has been produced.

Presentational conventions

The provisions of this PAS are presented in roman (i.e. upright) type. Its recommendations are expressed in sentences in which the principal auxiliary verb is “should”.

Commentary, explanation and general informative material is presented in italic type, and does not constitute a normative element.

Where words have alternative spellings, the preferred spelling is of the Shorter Oxford English Dictionary is used (e.g. “organization” rather than “organisation”).

The word “should” is used to express recommendations of this PAS. The word “may” is used in the text to express permissibility, e.g. as an alternative to the primary recommendation of the clause. The word “can” is used to express possibility, e.g. a consequence of an action or an event.

Notes are provided throughout the text of this PAS. Notes give references and additional information that are important but do not form part of the recommendations.

Contractual and legal considerations

This publication does not purport to include all the necessary provisions of a contract. Users are responsible for its correct application. Compliance with a PAS cannot confer immunity from legal obligations.

Introduction

The development of this Publicly Available Specification (PAS) has been informed by the work of the Working Group on Product Recalls and Safety (WGPRS) and associated behavioural insight research into the effectiveness of product recalls.

The general product safety regulations and product specific safety regulations require that new and used consumer products placed on the market in the United Kingdom must be safe, with the responsibility for ensuring that safety being borne by businesses across the supply chain.

The responsibilities imposed by the legislation include duties to:

- place only safe products on the market, supported by information on their correct use;
- warn consumers about potential product-related risks;
- monitor the safety of products;
- inform the relevant Market Surveillance Authority (MSA) if a safety issue is identified;
- take effective corrective action where necessary.

Although the vast majority of products are safe and do not become the subject of corrective action, the availability of a planned course of action is critical to ensuring a timely and effective response should a safety issue or potential safety issue arise.

Businesses may experience potential recall situations rarely and this PAS is intended to make it easier for them to prepare for and deal with, such situations.

Part 1 is intended for businesses offering non-food consumer products for sale and covers monitoring, assessing, notifying and correcting unsafe products, including through a recall or other corrective action if required, with emphasis on the preparation of a product safety incident plan (**PSIP**) by businesses, in advance of actual need. The PAS also provides guidance for businesses on activities required should a need for corrective action arise.

Part 2 is intended for Market Surveillance Authorities and covers the assistance that should be available to businesses from such regulators (**MSAs**) to support them in meeting their responsibilities in respect of consumer product safety issues.

The PAS provides practical guidance for businesses and does not replace or override any of the legal duties to which businesses or regulators are subject.

Part I – Code of practice for business

1 Scope

This PAS consists of two parts, Part I sets out a code of practice for businesses, providing practical guidance to help them:

- prepare to manage a possible safety related product recall or other corrective action;
- establish mechanisms to monitor the safety of consumer products;
- investigate any potential product safety issue;
- establish mechanisms to deal with any product safety issue identified;
- review corrective action programmes to ensure that product safety responsibilities continue to be met.

The PAS is focussed on non-food consumer products and is intended for use by producers, importers and distributors irrespective of type or size. It is accepted that smaller organizations could need to adjust the scale of activity associated with any product recall or other corrective action undertaken, but the principles that underpin this code are equally applicable whatever the size of organization and are to be adhered to in all such undertakings. The content of this PAS could also be relevant for business to business supply.

The PAS assumes that businesses placing products on the market, including following repair or refurbishment, will have already addressed their responsibility to supply only safe products and guidance on this is not provided.

The PAS is not intended to conflict with existing sector specific schemes (e.g. automotive, medicines, medical devices) which are to be referred to in respect of the product categories covered.

2 Terms and definitions

For the purposes of this PAS, the following terms and definitions and abbreviations, apply:

NOTE Definitions for which a legislative source is identified are not necessarily presented in the normally accepted format for standards.

2.1 authorised representative

natural or legal person established within the Community who has received a written mandate from a manufacturer to act on its behalf in relation to specific tasks with regard to the latter's obligations under the relevant Community legislation

(Derived from: Regulation (EC) No 765/2008)

2.2 consumer

individual member of the general public purchasing or using property, products or services for private purposes

(Source: ISO 2600:2010)

2.3 consumer product

means a product which is intended for consumers or is likely, under reasonably foreseeable conditions, to be used by consumers even if not intended for them and which is supplied or made available, whether for consideration or not, in the course of a commercial activity and whether it is new, used or reconditioned and includes a product that is supplied or made available to consumers for their own use in the context of providing a service

(Source: GPSR, SI 2005 No 1803)

2.4 corrective action

action undertaken with the intention of removing potential for harm and to reduce risk from a product which is not a safe product

(Derived from: ISO 10393:2013)

2.5 distributor

natural or legal person in the supply chain, other than the manufacturer or the importer, who makes a product available on the market and whose activity does not affect the safety of the product

(Derived from: Regulation (EC) No 765/2008 and GPRS, SI 2005 No 1803)

NOTE throughout this PAS, distributor is used in a manner that includes retailer.

2.6 harm

physical injury or damage to the health of people, animals, or damage to property

2.7 hazard

potential source of harm

NOTE the term hazard can be qualified in order to define its origin or the nature of the expected harm (e.g. electric shock hazard, biological hazard, crushing hazard, cutting hazard, toxic hazard, fire hazard, asphyxiation hazard).

(Derived from ISO/IEC Guide 51:2014, 3.2)

2.8 importer

natural or legal person who places a product from a third country on the UK market

2.9 making available on the market

supply of a product for distribution or consumption, in the course of a commercial activity, whether in return for payment or free of charge

2.10 manufacturer

natural or legal person who manufactures a product or has a product designed or manufactured, and markets that product under his name or trademark

(Source: Regulation (EC) No 765/2008)

2.11 market surveillance authority (MSA)

regulator with enforcement responsibilities in relation to non-food consumer product safety regulations, including local weights and measures authorities in England, Scotland and Wales (often referred to as trading standards), district councils in Northern Ireland and the Secretary of State (Department for Business, Energy and Industrial Strategy)

NOTE For the purposes of this code of practice, only the enforcement of product safety regulations is relevant whilst recognising that MSAs also cover the enforcement of other regulatory provisions.

2.12 placing on the market

the first making available of a product on the market

NOTE this would include the actions of any professional in the supply chain whose actions changed the safety characteristics of a product.

2.13 primary authority

statutory scheme under which a local authority can enter into a partnership agreement with a business or group of businesses to provide assured regulatory advice on which the business subject to legal safeguards is entitled to rely

NOTE a local authority having entered such a partnership with such a business or group of businesses is then described as the primary authority.

2.14 producer

- a) the manufacturer of a product, when established in a Member State, and any other person presenting himself as the manufacturer by affixing to the product his name, trade mark or other distinctive mark, or the person who reconditions the product;
- b) when the manufacturer is not established in a Member State:
 - i) if he has a representative established in a Member State, the representative,
 - ii) in any other case, the importer of the product from a state that is not a Member State into a Member State;
- c) other professionals in the supply chain, insofar as their activities may affect the safety properties of a product

(Source: GPSR, SI 2005 No 1803)

NOTE any third party who in the course of business, whether for profit or otherwise, repairs or refurbishes a product, places that product on the market when it is subsequently offered for sale supply.

2.15 recall

measure aimed at achieving the return of a product other than a safe product, that has already been supplied or made available to consumers

(Source: GPSR, SI 2005 No 1803)

2.16 risk

combination of the probability of occurrence of a hazard generating harm in a given scenario and the severity of that harm

(Source: EU general risk assessment methodology)

2.17 risk assessment

process of quantification of the level of risk

2.18 safe product

product which under normal or reasonably foreseeable conditions of use including duration and, where applicable, putting into service, installation and maintenance requirements, does not present any risk or only the minimum risk compatible with the products use considered to be acceptable and consistent with a high level of protection for the safety and health of persons, taking into account the following points in particular:

- i) the characteristics of the product, including its composition, packaging, instructions for assembly and, where applicable, for installation and maintenance;
- ii) the effect on other products where it is reasonably foreseeable that it will be used with other products;
- iii) the presentation of the product, the labelling, any warnings and instructions for its use and disposal and any other indication or information regarding the product;

- iv) the categories of consumers at risk when using the product, in particular children and the elderly

NOTE The feasibility of obtaining high levels of safety or the availability of other products presenting a lesser degree of risk shall not constitute grounds for considering a product to be "dangerous".

(Source: GPSR, SI 2005 No 1803)

2.19 supporting regulator

national regulator or government department that has a statutory role in Primary Authority of providing support to a primary authority in its provision of advice to business, or its development and management of an inspection plan for a business. The following are specified as supporting regulators:

- the Health and Safety Executive;
- the Food Standards Agency;
- the Gambling Commission;
- the Competition and Markets Authority; and
- the Secretary of State, in relation to his regulatory functions concerning weights and measures and product safety regulation

(Derived from Primary Authority Statutory Guidance)

2.20 withdrawal

any measure aimed at preventing a product in the supply chain from being made available on the market

(Source: Regulation (EC) No 765/2008)

Abbreviations, acronyms and initializations

The following representations are used in this document:

BEIS	UK Government Department for Business, Energy and Industrial Strategy
GPSR	General Product Safety Regulations (Implementing the General Product Safety Directive in the UK)
ICSMS	information and communication system for market surveillance (database)
MSA	market surveillance authority
OECD	organisation for economic development and cooperation
PAS	publicly available specification
PSIP	product safety incident plan
RAPEX	rapid alert system for non-food consumer products
WGPRS	working group on product recall and safety

3 Regulatory context

Summaries of the regulatory requirements to supply only safe products complying with the general product safety requirement and also with product specific safety regulations, are set out in **Annex A** together with details of product liability under civil law.

The Annex also sets out the specific responsibilities of producers, importers and distributors with respect to product safety.

4 Advance planning for corrective actions

4.1 Context

Advance planning is essential to enable a business to act efficiently and quickly if, as and when questions as to the safety of a product arise. This section of the PAS is intended to provide practical guidance on the preparation of a product safety incident plan (**PSIP**).

A **PSIP** should be in place and include the entirety of policies, organization and plans required to deliver an effective recall or other corrective action. Producers, importers and distributors operating in the UK should each have a **PSIP** in place.

4.2 Senior management commitment

It is essential that the UK senior management of the business commit to the development and operation of a **PSIP**. This commitment will be at Board level, where this exists or, with the owner or most senior decision maker in the business. There needs to be clarity as to who is responsible and accountable for development and operation of the **PSIP**.

The **PSIP** will ensure that the organization is prepared to deal with any incident potentially requiring corrective action should it arise and is committed to devoting sufficient resources to it. Where possible, the **PSIP** should be referenced in the organization's quality management system e.g. implementing ISO 9001.

Key elements of this **PSIP** commitment include:

- allocation of responsibility for leading and developing the **PSIP**;
- preparing a business policy statement setting out commitment;
- securing support for the **PSIP** within the business;
- engagement with relevant supply chain partners;
- internal publication and dissemination;
- arrangements for periodic review;
- formal senior management or business owner endorsement.

4.3 Developing a PSIP

A **PSIP** should be developed with input from persons having relevant expertise of the following areas:

- design and ergonomics;
- devising product instructions;
- production;
- technical (including IT);
- quality assurance;
- risk management (including insurance liability considerations);
- purchasing;
- supply chain management /logistics/ distribution;
- sales;
- marketing;
- customer services;
- product servicing;
- public and corporate relations;
- web communication and website management;
- product legal compliance;
- risk assessment and evaluation;
- finance.

In smaller organisations, several functions may be the responsibility of one person.

Some of these functions may be carried out or supported by external organisations.

Businesses are encouraged to consult the relevant **MSA** (through Primary Authority where applicable) in development of their **PSIP**.

Assistance will be available from a range of other sources including trade associations and similar bodies.

4.4 Contents of the PSIP

4.4.1 PSIP elements

A **PSIP** should include the following elements where appropriate:

- product and customer traceability plan (4.4.2);
- product safety monitoring plan (4.4.3);
- legal notification plan (4.4.4);
- risk assessment plan (4.4.5);
- corrective action decision plan (4.4.6);
- communications plan (4.4.7);
- training plan (4.4.8);
- testing plan (4.4.9);
- review plan (4.4.10).

The **PSIP** should set out responsibilities and actions (who, what, where, when, why and how) in respect of each of the above.

4.4.2 Traceability plan

4.4.2.1 Product Traceability

General product safety regulations and product sector specific regulations, contain traceability marking requirements that must be followed where applicable.

Being able to identify products and their key components can be central to the ability to successfully withdraw or recall them from the market place. The extent of traceability information required and the form it should take should be determined on the basis of risk.

This traceability information should identify: the producer or manufacturer of the item; the general product identifier (e.g. model reference); and a specific identifier for the product or series of products (e.g. serial number, batch reference, date of manufacture).

Deciding what form the traceability information should take, where it should be positioned on the product to facilitate easy access, and the best way of including this information so that it remains legible after use all, need to be considered within the design process. Consideration should be given to the durability of markings to enable them to withstand general wear and tear and, where practical and appropriate, fire and /or water damage.

The design process should include deciding which parts, components, sub-assemblies etc. are likely to play an important part of the safety of the final product, since these too will need traceability information to be included about them. This information is likely to be vital to the manufacturer, should a corrective action become necessary, as it not only allows cross-checking against complete products but also because it could affect spare parts held in stock or made available to third parties.

Providing the information on the product itself is required wherever possible, since packaging is usually discarded.

4.4.2.2 Customer traceability

The **PSIP** should allocate responsibility for ensuring that customer contact information is systematically captured.

The level of traceability that is possible will vary depending on the product type and method of sale.

Consumers should be asked to consent to their contact details being recorded, without having to opt in or out for their details being used for marketing purposes, making it clear that this is for use only in the event of need for contact arising in respect of product safety. Such records should be kept entirely separate from registration for warranty or marketing purposes.

Where practical and proportionate, and in accordance with data protection rules, producers and distributors should aim to keep records of customers and their purchases. This information should include:

- name, address, postcode, telephone number and email addresses of customers;
- brand, model, serial number, and date of the purchase for the product.

The following may be able to provide some of this information:

- sales records (including for internet transactions);
- records kept by distributors;
- guarantee or registration cards or on-line registrations;
- product delivery information;
- servicing records;
- post-purchase registration schemes enabling consumers to record the products they possess for product safety purposes;
- distributor loyalty card schemes;
- banks and credit card provider records;

- on-line platforms for the sale of second hand goods.

4.4.3 Product safety monitoring plan

Producers, and distributors, within the limits of their responsibilities, are required to establish mechanisms to carry out effective risk-based monitoring of their products. These mechanisms should be sufficient to identify potential product safety issues that might arise during their use.

Where a product is marketed internationally, monitoring should include relevant information that may be available from other markets.

The **PSIP** should set out the arrangements to collect and analyse information on an ongoing basis in respect of each product that a business supplies, including the following as appropriate:

a) Information demonstrating compliance of the product type:

- results of product testing;
- internal quality control procedures;
- information from service engineers or from after sales/repair centres;
- reports on examination of returned components and products.

This information is most likely to be held by organisations having the responsibilities of a producer.

b) Incoming information from customers:

- direct reports of incidents or accidents involving products;
- complaints from consumers, direct or via distributors;
- guarantee / extended warranty claims;
- insurance claims or legal actions;
- media and social media reports following verification.

c) Other potential sources of information:

- **MSAs**, the Fire Service and other regulators;
- information from supply chain partners;
- retail and insurance sector notification of potential issues (arrangements for collation of incident information across sectors for example retail can enable early identification of potential issues);
- residential social landlords;
- service and maintenance organisations;
- consumer bodies and representative organizations;
- third sector specialist safety bodies;
- on-line product reviews;

- developments in legislation or standards concerning the products involved;
- government product recall website;
- trade associations;
- EU RAPEX / OECD / CPSC product recall databases.

The information in b) and c) should be collected by both producers and distributors. It is important that producers and distributors share product safety information and the **PSIP** should establish arrangements for doing so.

It may be advisable, where appropriate, to gather evidence of risks posed by sales to unexpected user groups, inappropriate use of the product and malicious tampering with products.

A holistic approach should be taken to the assessment of incoming information having due regard to the need for validation and verification of information if required.

The **PSIP** should provide for prompt investigation of any information suggesting a product may not be safe.

The **PSIP** should provide for the adequacy and effective performance of the monitoring arrangements in place to be kept under regular review.

4.4.4 Legal notification plan

Producers, importers and distributors, within the limits of their respective activities, are legally required to notify the relevant **MSA** forthwith if they know that a product they have placed on the market or supplied, is unsafe and will need or potentially need, recall or other corrective action. Notification should not be delayed on the basis of completion of a full risk assessment.

UK Government guidance on the notification requirement under the general product safety requirement is available at gov.uk.

This notification must include information on any action taken to reduce risk to consumers and in the case of a serious risk must provide the following:

- information enabling a precise identification of the product or batch of products in question;
- a full description of the risks the product presents;
- all information relevant for tracing the product.

Notification should not be delayed because the business is not yet in a position to provide all of the required information. In this case the additional information should be provided as it becomes available.

The **PSIP** should emphasise the legal duty to notify the **MSA** and allocate responsibility for timely notification.

Best practice is for the **PSIP** to make provision for early sharing of information with the relevant **MSA** (through Primary Authority if applicable) concerning any issue emerging from product safety monitoring activity. This may also assist the business in determining if and when notification is required.

Distributors within the limits of their activities are required to:

- pass on information on the risks posed by a product;
- keep documentation necessary for tracing the origin of the product;
- produce the documentation necessary for tracing the origin of the product;
- cooperate in action taken by a producer or an enforcement authority to avoid the risks.

4.4.5 Risk assessment plan

It is essential that decisions around the need for, and nature of, corrective actions are evidence-based and take into account the severity of each hazard and the risk of harm associated with that hazard.

The **PSIP** should include a plan for how incidents will be investigated and risk assessment carried out. The risk assessment should include an identification of hazards associated with the product and an objective assessment of the severity of harm potentially resulting from those hazards. The combination of the probability that a hazard will result in harm, and the severity of that harm, describes the resulting risk.

A documented risk assessment should be undertaken where there is sufficient and reasonable evidence that a hazard would occur under conditions of foreseeable use and known misuse of a product.

Where a risk is immediate and obvious a formal risk assessment may not be necessary before a corrective action decision is taken, but in most cases a more formal risk assessment is required before a decision is made.

This **PAS** recommends the use of risk assessment methodologies as set out in **Annex B**.

Risk assessment needs to be carried out by a person or a small team with relevant competence relating to the methodology of the risk assessment tool being used and relevant knowledge and expertise of the product and hazards involved.

In assessing the severity of the risk and likelihood of its occurrence, specialist expertise may be required. **MSA's** and in particular primary authorities, will be able to assist the business in identifying likely sources of such expertise. In matters involving particular risk (e.g. fire risk), sourcing the expertise of independent specialists in the risk involved should be considered.

The **PSIP** should include consideration of those circumstances in which specialist external expertise should be sought and where such support is likely to be available.

An **MSA** may be asked to advise a business during the risk assessment process.

The **PSIP** should make provision for a full record of any risk assessment completed to be retained setting out the objective evidence supporting the decisions made.

It is likely that the evidence concerning the level of risk presented will change over time, so the **PSIP** should provide for risk assessments to be reviewed and repeated if significant new information becomes available e.g. further accident reports or test results.

4.4.6 Corrective action decision plan

Decisions must be made objectively using all the available evidence in a timely manner to manage the risk from unsafe products.

The **PSIP** should set out clearly how decisions on corrective action will be made, by whom and within what timescales.

The **PSIP** should identify nominated decision makers, consultation requirements that will be followed and contingency plans if nominated decision makers are unavailable.

The **PSIP** should require that corrective action be proportionate to the level of risk posed by the unsafe product in question using accepted guidance.

The **PSIP** should provide for the assessment of the overall level of risk (see **Annex B**), as follows:

a) serious or high risk:

Examples of immediate action that would normally need to be taken:

- isolate producer's own stocks;
- ask distributors to isolate affected products;
- inform suppliers of any affected products or components as components may be used across product ranges;

- set up a communication programme to contact consumers;
- put arrangements in place to deal with affected product.

b) medium risk:

Each situation should be considered on its own merits but in this case corrective actions might be limited to:

- preventing the further distribution of products in the distribution chain;
- issuing revised warnings or instructions to consumers.

c) Low risk:

Again, each situation should be considered on its merits, but in this case it may be sufficient to limit corrective action to changes affecting products in design and production.

In all cases, the corrective action should include taking steps to investigate the root cause of the issue and taking steps to avoid the issue arising again in future.

Consideration should be given in the **PSIP** to arrangements for the safe and lawful disposal of affected products.

The **PSIP** should provide for a nominated individual to keep a record and timeline of key decisions and actions during consideration and implementation of corrective actions.

4.4.7 Communications plan

4.4.7.1 Contacts

The **PSIP** should list the organisations and individuals that may need to be contacted during a corrective action.

It is important to ensure that the relevant contacts are identified in each of these organisations and that information is kept up to date.

The contact list could include:

a) Internal business contacts

- responsible senior management;
- nominated decision makers;
- members of the product safety incident team;
- customer services;
- risk assessment experts;
- manufacturer's representatives and other selling agents;
- repair centres;
- logistics;
- communications.

b) Contacts in other organisations

- Primary contacts
- **MSAs**;
- Commercial customers;
- suppliers;
- distributors;

c) Secondary contacts, as required

- trade associations;
- external legal advisors;
- risk assessment experts;
- medical experts;
- independent technical product experts;
- TV and other relevant media;
- servicing businesses;
- test laboratories;
- insurers;
- call centre agencies;
- waste disposal specialists;
- media advisors.

4.4.7.2 Communications

Effective communication with identified contacts deemed appropriate is central to a successful corrective action.

The **PSIP** should establish mechanisms to ensure a comprehensive communications and media plan is in place that identifies a nominated person as being responsible for it.

The plan should set out how timely and effective messages will be prepared and disseminated to the following audiences:

- the relevant **MSA(s)**;
- internal staff members;
- business customers, distributors and suppliers;
- consumers;
- media – (proactively and reactively).

Consumer contact should not commence until the other audiences are briefed and ready to respond.

The communication plan should include how the following will be delivered:

- Q and A for customers;
- communication plans for different media and audiences;
- customer services centre with Freephone telephone access (where necessary);

- corrective action web page and email address;
- list of the businesses and consumers to be contacted;
- list of media including social media to be used.

4.4.7.3 Content of recall and other corrective action announcements

The **PSIP** should include template corrective action announcements.

Announcements need to be clear, concise, factual and easily understandable by all. The reading age for announcements should be kept low and graphics should be used where possible as English may not be the first language of some of the target audience.

A corrective action announcement should always contain:

- a clear heading that draws attention to the announcement containing words 'Important Safety Warning and a description of the corrective action for example 'Product Recall';
- a clear description of the hazard (fire, electrocution, asphyxiation, etc.) and associated or potential, safety risk;
- product identification details such as; brand, bar code, colour, size;
- a photograph of the product;
- details of when and where the product was available for sale;
- a description of the action required by any consumer who believes they have a product covered by the announcement;
- details of arrangements for any proposed refund, exchange or repair;
- a web site address and Freephone number for further information.

Where possible the following additional product information should be included:

- model, batch number, serial number and where they are to be found on the product;
- additional information to ensure consumer safety (e.g. 'Stop using immediately' 'Unplug and do not use', 'Do not use pending repair', 'Do not touch or move'), should be included where necessary.

It can be useful to include a 'checker tool' in online messages and web pages to assist consumers to identify if their product is affected.

Although the use of colour to attract attention is strongly recommended, consideration should be given when using colour that some people may be colour blind.

Announcements should not include words such as 'voluntary', 'precautionary', or 'possible' or contain information that otherwise detracts from the seriousness of the risk being communicated.

Fire hazard should be described as such and not as an 'overheating' or 'quality defect'.

Direct communications by email, text, social media, mail can be very effective. All communications should be marked 'Important safety warning' in large red print where possible. This should appear on the outside of envelopes and in the subject lines of emails.

Further guidance as to the content and layout of corrective action communications is provided in **Annex G**.

4.4.7.4 Communication channels

The **PSIP** should be clear on which communication channels will be used in which circumstances and plans should be in place to enable communications to be developed and implemented rapidly if required.

It is best practice for the action proposed to be discussed with the **MSA** to agree adequacy of the proposed communications plan.

Examples of communication channels that could be used:

- personal contact with affected consumers (by email, letter, text messages, phone);
- recall action web page with links from the home pages of all relevant company websites;
- links to recall page from customer websites;
- links to recall page from professional body web sites;
- social media;
- point-of-sale information (leaflets, mini-posters);
- .Gov.UK and third party recall web sites;
- radio/TV news and consumer programmes;
- media news rooms;
- advertisements in newspapers;
- advertisements in specialist publications or specialist publications;
- telephone services (free-phone contact capability);
- mailshots / door to door leaflets;

- store loyalty schemes;
- trade bodies/consumer owners clubs;
- online platforms for the supply of goods and services.

Use of some of the media mechanisms listed above is not necessary or possible for all corrective actions. The methods selected for each programme should relate to the assessed level of risk, the mechanisms available, the affected product type and the target group of consumers likely to be affected.

Personal contact with affected customers is known to be the most likely method of ensuring effective engagement with a corrective action programme.

E mail addresses tend to remain with customers through changes of residential address.

It is unlikely a single approach will deliver a successful corrective action programme.

It is highly unlikely that an A4 notice at an in-store customer service desk or an advertisement in a single daily newspaper will deliver an effective response because it would most likely be seen by only a very limited audience.

Content gets buried quickly on social media. Make sure that you repost and update often enough to keep your messages easily within view of the people who need to access them.

Even after the majority of recalled product has been accounted for, social media should continue to be monitored for signs that consumers are experiencing problems.

In the case of products subject to seasonal use the **PSIP** should provide for consideration of the need to repeat messaging in the following (and potentially subsequent), years.

If a pro-active media release is not considered necessary, a set of messages should nevertheless be prepared to respond reactively to media and consumer enquiries. The decision to issue a media release should be kept under review in case the scale or nature of the issue subsequently makes it necessary.

The length of time for which information should be readily available for consumers should be agreed with the **MSA**.