AUDIT PROCEDURES

HWA Charter



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DISCLAIMER: It is not possible nor the intention of the Charter Audit to check the veracity and/or accuracy of all technical documentation. Compliance with the requirements of the HWA Charter Scheme is the opinion of the auditors. It shall not be construed as implying compliance with any other relevant legislation, standards or marking requirements that may be subject to independent scrutiny or audits by other third-party organisations. The auditors shall not be held responsible for any errors or omissions arising from the Charter audit. If a Charter Member disagrees with the opinion of the auditor and such disagreement cannot be resolved between the two parties, the issue shall be referred to the Hot Water Association management for adjudication.

The HWA Charter is managed and promoted by:

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1. INTRODUCTION & PURPOSE

The HWA Charter puts in place all the elements that are required to ensure that hot water products are supplied in a way that they meet the terms set out in the Charter Code of Practice. The Charter receives widespread support from water heating appliance manufacturers and suppliers of related products. It is managed and promoted by the Hot Water Association (HWA).

The HWA Charter Code of Practice requires that members of the Scheme:

- Supply fit for purpose products clearly and honestly described
- Supply products that meet, or exceed, appropriate standards and building and water regulations
- Provide clear instructions for the installation, commissioning, use, removal, and disposal of products
- Provide pre and post sales technical support
- Provide clear and concise warranty details to customers

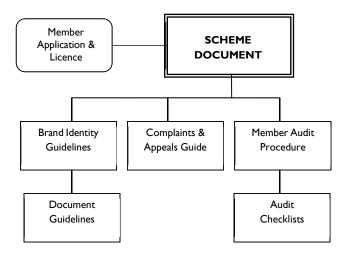
A key Scheme requirement is that Charter Members are subjected to regular independent audits and governance to ensure they continue to meet the requirements of the HWA Charter. Audits shall be repeated every two years.

2. SCOPE

The HWA Charter is focused on hot water storage equipment and related ancillary products (i.e. electrical, electronic, or hydraulic controls that are integrated in, supplied with, or pre-plumbed onto hot water storage vessels).

3. SCHEME STRUCTURE

The Scheme Document sets out the principles and requirements of the HWA Charter and refers to a hierarchy of other documents designed to aid in delivering the aims of the Charter. The following figure indicates the overall documented structure and the link between the various Scheme documentation.



The Scheme is operated by the Hot Water Association (HWA) who may subcontract specific functions to one or more suitable bodies.

Members of the HWA may become Charter Members provided that they supply products within the Scope of the Charter and fully adhere to all relevant Charter requirements.

The management system operated by the HWA for the Charter is based on the general principles of the quality management systems standard ISO 9001 but has been adapted specifically to apply to the operation of the Scheme.

4. INITIAL AUDIT METHODOLOGY

In order to become and remain a Member of the HWA Charter a product supplier must satisfy the requirements of the HWA Charter Scheme Document at all times. To demonstrate this Members shall be periodically audited against the relevant requirements of the Scheme to ensure continued compliance. Section 5 details the elements that will be checked during the audit with references to the relevant sections and clauses within the Scheme Document.

Controls and ancillary equipment manufacturers and suppliers will undergo a reduced audit procedure as many of the requirements for hot water storage equipment are not relevant and cannot be practically evidenced. Section 5 details the elements that will be checked during the audit with references to the relevant sections and clauses within the Scheme Document.

Applicants / Members are required to declare at the request of the auditor the ranges or categories of current or proposed products that are to be in scope for the Scheme by completing a Pre-Audit Questionnaire & Product Listing form. This will be sent to Members prior to arranging an audit and must be returned before an audit date can be arranged.

Audits may be conducted remotely (via video conferencing) or by an arranged visit. Because of the nature of some product types not all the requirements may apply to every Member.

Where Charter Members are encouraged to display the HWA Charter Member logo on customer accessible media such as promotional materials, technical documentation, product and packaging labelling, etc. it must adhere to the requirements of the HWA Brand Identity Guidelines document. Customer accessible media should also display the principles of the HWA Charter Code of Practice.

5. SCHEME ELEMENTS TO BE CHECKED

The following elements detailed in the HWA Charter Scheme Document will be assessed during the Audit:

HOT WATER STORAGE PRODUCTS

Scheme administration requirements Clauses 5.1 to 5.4 Product documentation related requirements Clauses 6.1 to 6.8

Energy related products requirements Clauses 7.1 to 7.6

(Where applicable the requirements of Directly heated and Indirectly

heated products will be assessed)

HWA Heat Pump cylinder spec requirements

Factory production control requirements

Clauses 8.1 to 8.3

Clauses 9.1 to 9.3

Spare Parts and Warranty related requirements

Clauses 10.1 to 10.3

Installer / Customer support requirements

Clauses 11.1 to 11.9

Scheme audit requirements

Clauses 12.1 to 12.4

ANCILLIARY CONTROLS MANUFACTURERS AND SUPPLIERS

Scheme administration requirements

Clauses 5.1 to 5.4

Product documentation related requirements

Clauses 6.1 to 6.8

Factory production control requirements

Clauses 9.1 to 9.3

Spare Parts and Warranty related requirements

Clauses 10.1 to 10.3

Installer / Customer support requirements

Clauses 11.1 to 11.9

Scheme audit requirements

Clauses 12.1 to 12.4

6. DOCUMENTS TO BE PROVIDED

The following documents will need to be examined by the auditor relevant to the products under audit. Products to be audited will be randomly selected from the Product Listing section of the Pre-Audit Questionnaire & Product Listing form. These will be notified to the company being audited prior to the audit date. It will be useful for as much of the documentation listed to be provided prior to the audit to enable the auditor to carry out some preparatory analysis.

Installation Manual

User Instructions

Servicing and Maintenance instructions

Spare parts list

Product fiche (as required by EU delegated regulation 812/2013 Annex IV)

Warranty details

Note: The above may be combined into a single document

Product data label or labels (representative)

Product Energy Efficiency rating label (as required by EU delegated regulation 812/2013 Annex III)

Evidence of the Technical File for each product audited will be requested. The Technical File must show test reports and results supporting the information quoted in the Technical Fiche and on any energy labelling (as required by EU delegated regulation 812/2013 Annex V).

Product marketing materials

Details of any 3rd Party Product certification

Details of any 3rd Party Quality System certification

CE and/or UKCA Declaration of Conformity (must include <u>all</u> relevant product legislation)

Factory Production Control procedures Internal training procedures and records

Procedures for issuing safety warnings, fault notifications or product recalls

Procedures for dealing with and resolving customer complaints Procedures for recording field faults, returns under warranty and analysing results to identify problem trends

Information reproduced on any relevant technical and promotional documentation shall be consistent across all media, including any web based information. Member company web pages will be checked to confirm this.

7. RECORDING THE INITIAL AUDIT OUTCOME

The auditor shall complete an Audit Checklist during the course of the audit recording their findings relating to each of the Scheme requirements. Two Checklist documents exist, that, relevant to the Charter Members company, shall be used as follows:

- Audit Checklist for Hot Water Storage Product manufacturers and suppliers
- Audit Checklist for Hot Water Controls manufacturers and suppliers (including electrical, electronic or hydraulic controls that are integrated in, supplied with, or pre-plumbed onto hot water storage vessels)

Each relevant element of the Audit Checklist shall be discussed between the auditor and the authorized company representative(s) attending the audit meeting. Evidence may be requested to demonstrate how certain elements of the Charter Scheme requirements are met (Section 5 lists examples of information that will need to be assessed).

The auditor shall enter commentary with respect to each element of the Charter Scheme Document assessed. Each element shall be noted as Compliant (C), Non-compliant (NC), or Not Applicable (N/A). Where an element under assessment requires a response to any commentary raised by the auditor an Observation (OBS) shall be noted.

A reference number shall be assigned to each non-compliance or observation raised which shall be used in the list of non-conformances and agreed improvement actions at the end of the Audit Checklist used. Following completion of the audit any non-conformities and/or observations shall be discussed and agreed, and a timescale for resolution agreed (refer to Section 8 of this document or Clause 12.4 of the Scheme Document for acceptable timescales).

A copy of the Audit Checklist shall be supplied to the company authorized representative as a record of the audit discussions. (Note: for clarity this may be a typed-up copy if the auditors' notes were handwritten. In such cases the auditor shall retain the original handwritten copy). The authorized representative shall countersign a copy and return it to the auditor to indicate receipt and acceptance of the Checklist and findings.

8. ISSUE RESOLUTION

The Audit Checklist shall include an overview of any non-conformities and/or observations recorded during the initial audit. These shall be referenced to the relevant element of the audit. Where relevant, actions required to resolve the issue will also be noted

It is the responsibility of the authorized company representative to advise the auditor how any issues raised have been resolved. Where necessary this will require submitting or demonstrating any new documentation, procedures or information to the auditor. It is recognized that often some technical information will be confidential to the member company, in such instances enabling the auditor to view the relevant information electronically or by video sharing would be acceptable provided it satisfies the audit requirements.

Issues shall be satisfactorily resolved by the date agreed at the initial audit. Non-compliance with ErP issues shall be addressed and accepted by the auditor within 4 working weeks of the audit date. Non-compliance with other issues shall be addressed within 6 working weeks of the audit date. This period can be extended at the discretion of the auditor but shall not exceed a period of 12 working weeks from the initial audit date. Where changes to printed documentation are necessary and lead-times and/or stocks mean that an issue cannot be resolved within these timescales an action plan shall be agreed between the Member and the auditor.

9. CLOSING THE AUDIT

Once all outstanding issues have been satisfactorily resolved the auditor shall inform the HWA that the audit has been successfully completed.

It is the responsibility of the HWA to issue Charter Member certification.

NOTE: Compliance with the requirements of the HWA Charter Scheme is the opinion of the auditors. It shall not be construed as implying compliance with any other relevant legislation, standards or marking requirements that may be subject to independent scrutiny or audits by other third-party organisations. If a Charter Member disagrees with the opinion of the auditor and such disagreement cannot be resolved between the two parties, the issue shall be referred to the Hot Water Association management for adjudication.