Vehicle
Certification
Agency

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Conformity of Production (CoP) clearance for GB/UKNI Type Approval

Vehicle Certification Agency

Contents

1. Normative references

EU and National legislation, accreditation and certification standards

- ISO/IEC 17021-1:2015 - Conformity assessment — Requirements for bodies providing audit and certification of management systems
- ISO 9001:2015 – Quality management systems requirements
- Regulation (EU) 2018/858 of the European parliament and of the council of 30 May 2018 on the approval and market surveillance of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles, amending Regulations (EC) No 715/2007 and (EC) No 595/2009 and repealing Directive 2007/46/EC
- Commission implementing Regulation (EU) 2020/683 of 15 April 2020 implementing Regulation (EU) 2018/858 of the European Parliament and of the Council with regards to the administrative requirements for the approval and market surveillance of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles

Notified national technical regulations

- The Motor Vehicles (Designation of Approval Marks) Regulations 1979 as amended;
- The Motor Vehicles (Type Approval) Regulations 1980 as amended;
- The Motor Vehicles (Type Approval for Goods Vehicles) (Great Britain) Regulations 1982 as amended; The Motor Vehicles (Type Approval) (Great Britain) Regulations 1984 as amended;
- The Agricultural or Forestry Tractor and Tractor Components (Type Approval) Regulations 1988 as amended; The Motor Vehicles (EC Type Approval) Regulations 1998 as amended;
- The Motor Cycles Etc. (EC Type Approval) Regulations 1999 as amended;
- The Non-Road Mobile Machinery (Emission of Gaseous and Particulate Matter) Regulations 1999 as amended.
- The Road Vehicles (Approval) Regulations 2020 as amended
- The Road Vehicles and Non-Road Mobile Machinery (Type-Approval) (Amendment) (EU Exit) Regulations 2019 as amended.

UNECE documents

- E/ECE/TRANS/505/Rev.3 – Agreement Concerning the Adoption of Harmonized Technical United Nations Regulations for Wheeled Vehicles, Equipment and Parts which can be Fitted and/or be Used on Wheeled Vehicles and the Conditions for Reciprocal Recognition of Approvals Granted on the Basis of these United Nations Regulations.

Note: All normative references are the latest editions unless otherwise specified. In the event of changes to directives, regulations or standards these scheme rules will be reviewed and updated. Changes will be notified to scheme participants as outlined in section 11. VCA operates to standard terms and conditions for the work the agency undertakes. Some requirements are reproduced here.

1.1. Application in Law

VCA is an executive agency of the United Kingdom Department for Transport appointed by the Secretary of State for Transport. Hence, in the context of applicable Regulations, the Department for Transport and the Secretary of State for Transport is taken to include VCA.

Fees charged by VCA are governed by

- The Motor Vehicles (Type Approval and Approval Marks) (Fees) Regulations 1999 (S.I. 1999 No. 2149) as amended by
- The Motor Vehicles (Type Approval and Approval Marks) (Fees) (Amendment) Regulations 1999 (S.I. 2003 No. 2258)

and by other specific Regulations as are applicable. If there is any conflict between these terms and those Regulations then the Regulations shall prevail. These terms and conditions shall be governed by and interpreted in accordance with English law and shall be subject to the jurisdiction of the Courts of England and Wales.

1.2. Conditions Relating to the Issue of GB, UK(NI) and United Nations (UN) Conformity of Production

Relevant legislation is listed in the Normative Requirements section above. Conformity of Production is issued by VCA under the terms of the applicable statutory Regulations and ECE Regulations (under the terms of the United Nations 1958 Agreement) referenced therein:

In particular (but not to the exclusion of other requirements):

1.2.1. Conditions

Conformity of Production may be withdrawn at any time and while held is subject to the conditions in 1.2.2 for vehicle parts of 1.2.3 for motor vehicles.

1.2.2. Conditions for Motor Vehicle Parts

1.2.2.1 The holder of the Conformity of Production clearance shall put the approval mark described in the Motor Vehicles (Designation of Approval Marks) Regulations 1979 as amended only on Motor Vehicle Parts that: a. have been manufactured, assembled or completed in factories under his control and b. conform in all material respects with the samples, which were tested before the relevant type approval was issued and c. have been manufactured whilst suitable Conformity of Production clearance was in place.

1.2.2.2 The holder of the Conformity of Production clearance shall mark his products in the manner set out in the relevant Regulation/Directive as given in the Motor Vehicles (Designation of Approval Marks) Regulations 1979 as amended together with:

a. the approval number allocated by the Secretary of State for Transport.
b. his name or trademark
c. any other markings specified in the appropriate notified national technical regulations

1.2.2.3 The holder of the Conformity of Production clearance shall be prepared at any time to satisfy Department for Transport officials or agents of the Department, that the quality of the part being produced and marked or intended to be by him with the approval marking conforms in all material respects with that of the samples tested as the appropriate notified national technical regulations require.

1.2.2.4 The holder of the Conformity of Production clearance undertakes to admit duly authorised officials or agents of the Department at all reasonable times to any premises in which parts marked or intended to be marked are being manufactured, assembled or stored and to permit any such official or agent to inspect parts and all records relating to them and their production processes.

1.2.2.5 In addition to the officials or agents referred to in 1.2.2.4 above, the holder of the Conformity of Production clearance must permit access, on request, to UKAS representatives assessing VCA's performance in carrying out conformity assessment activities.

1.2.2.6 The Conformity of Production may be suspended or withdrawn by the Secretary of State for Transport at any time without any particular length of notice being given and in the event of that being done the holder will absolve the Secretary of State from any claim for damages or compensation.

1.2.3. Conditions for Motor Vehicles

1.2.3.1 The holder of the Conformity of Production clearance shall put the approval mark described in the Motor Vehicles (Designation of Approval Marks) Regulation 1979 as amended only on Motor Vehicles fitted with Motor Vehicle parts which Motor Vehicles as fitted with such parts conform with the type of Motor Vehicle approved by as on behalf of the Secretary of State for Transport and only on Motor Vehicles that: a. have been manufactured, assembled or completed in factories under his control and b. conform in all material respects with the type of Motor Vehicle, which was tested before an approval certificate was issued and c. have been manufactured whilst suitable Conformity of Production clearance was in place.

1.2.3.2 The holder of the Conformity of Production clearance shall mark motor vehicles of the type approved. In the matter set out in the relevant Regulation/Directive using the authorised approval mark as given in the Motor Vehicles (Designation of Approval Marks) Regulation 1979 as amended together with the approval number allocated by the Secretary of State for Transport.

1.2.3.3 The holder of the Conformity of Production clearance shall mark Motor Vehicles of the type approved in the manner set out in the relevant notified technical Regulation using the authorised approval mark which comprises a lower-case letter g followed by the number 11 together with the approval number allocated by the Secretary of State for Transport.

1.2.3.4 The holder of the Conformity of Production clearance shall be prepared at any time to satisfy Department for Transport officials or agents of the Department that Motor Vehicles of the type approved which have been produced and marked or that are intended to be marked by him conform in all material respects with the type of vehicle approved.

1.2.3.5 The holder of the Conformity of Production clearance undertakes to admit duly authorised officials or agents of the Department at all reasonable times to any premises in which the Motor Vehicles of the type approved which have been or are intended to be marked are manufactured, assembled or stored and to permit any such official or agent to inspect the Motor Vehicles and all records relating to them and their production processes.

1.2.3.6 In addition to the officials or agents referred to in 1.2.2.4 above, the holder of the Conformity of Production clearance must permit access, on request, to UKAS representatives assessing VCA's performance in carrying out conformity assessment activities.

1.2.3.7 The Conformity of Production clearance may be suspended or withdrawn by the Secretary of State for Transport at any time without any particular length of notice given and in the event of that being done the holder will absolve the Secretary of State from any claim for damages or compensation

2. Terms and definitions

The VCA maintains a list of commonly used terms in the field of type approval. Additionally, legislation referred to in section 1 contains definitions relating to all aspects of vehicle type approval.
Selected terms related to Conformity of Production are also recorded below.

Approval Authority

'approval authority' means the authority in a country with competence for all aspects of the type-approval of a vehicle, system, component or separate technical unit, for the authorisation process for parts and equipment, for issuing and, if appropriate, for withdrawing or refusing approval certificates, for acting as the contact point for the approval authorities of other countries, for designating the technical services, and for ensuring that the manufacturer has suitable conformity of production
VCA is the designated UK Type Approval Authority.

Assembly Plant
Assembly plant is a facility that produces parts or vehicles which can hold type approval.

Audit
An audit is a systematic documented process where obtained evidence is evaluated to determine whether criteria are met.

Calibration
Calibration is the documented comparison of a measuring device against a traceable reference device.

Certificate of Conformity
Certificate of Conformity is the document issued by the manufacturer which certifies that a produced vehicle conforms to the approved type of vehicle and complies with all regulatory acts that were applicable at the time of its production.

Certification Body
In the context of this scheme, the Certification Body is VCA Conformity of Production department

Change Control
Change control is a documented process that identifies how proposed changes to the product are managed. For CoP this includes product changes, legislative changes and administrative changes.

Conformity of Production (CoP)
Conformity of Production is a means of evidencing the ability to produce a series of

products that exactly match the specification, performance and marking requirements outlined in the type approval documentation. Whether you are a manufacturer, or the agent applying for approvals on behalf of a manufacturer, and whatever your product is, suitable CoP arrangements must be made.

Control plan
A control plan is a document that outlines the checks and tests that are conducted to verify ongoing compliance to the legislation

Corrective Action
Corrective Actions are improvements to an organisation's processes taken to eliminate causes of nonconformities.

Document Control
Document control is the use of practices that ensure that documents are created, reviewed, distributed, and disposed of in an organised and verifiable manner.

DVSA
DVSA is an executive agency of the Department for Transport. They are responsible for driving tests, MOT tests, carrying out tests to make sure lorries and buses are safe to drive, carrying out roadside checks on drivers and vehicles, and monitoring vehicle recalls.

Effective Personnel
The effective number of personnel consists of all personnel (permanent, temporary, and part-time) involved in the following key Conformity of Production activities.

- End of line CoP checks
- Creating template for Certificates of Conformity
- Determination of RMI fields
- Monitoring GB/UKNI Type Approval legislation
- Change control process in relation to CoP (not design)
- Person responsible for CoP competency recording
- Quality manager
- Purchasing manager for components

Great Britain (GB)
Region consisting of England, Wales and Scotland

Manufacturer
Manufacturer is the organisation responsible for the Type Approvals and Conformity of Production.

Manufacturer's Representative
manufacturer's representative' means any natural or legal person who is duly

appointed by the manufacturer to represent the manufacturer before VCA and to act on the manufacturer's behalf.

Major Non-conformance (NC)
A major NC is issued where there is evidence of systemic breakdown, lack of 'change control' process, or where there has been actual shipments of non-conforming material (or the potential for such).
Note: a number of minor non-conformities associated with the same requirement or issue could demonstrate a systematic failure and therefore constitute a major non-conformance

Minor Non-conformance
A minor NC is issued where there are minor lapses in requirements

Multi-stage
Multi-stage is where a number of manufacturers are involved in completing a vehicle, with each manufacturer holding approval for the elements that they complete.

Non-conformance
Nonconformance is the failure to meet one or more requirements.

OBD (Vehicle on-Board Diagnostics)
'vehicle on-board diagnostic (OBD) information' means the information generated by a system that is on board a vehicle or that is connected to an engine, that is capable of detecting a malfunction, and, where applicable, is capable of signalling its occurrence by means of an alert system, is capable of identifying the likely area of malfunction by means of information stored in a computer memory, and is capable of communicating that information off-board

Preventative action
Preventative action is a change implemented in part of a quality management system to ensure that nonconformances do not occur.

Quality Management System
A Quality Management System is a formal system that documents processes, procedures and responsibilities for achieving quality policies and objectives.

Quality Manual
Quality manual is a set of documents that define and communicate a manufacturers Quality Management System

Quality Policy
Quality Policy is the intensions and directions of an organisation in relation to quality as expressed by the top management

Recall
The action taken to identify product for repair or re-engineering in order to return it back to compliance

Root Cause
Root Cause is the factor that led to a nonconformance.

Type Approval
Vehicle type approval is the confirmation that production samples of a type of vehicle, vehicle system, component or separate technical unit will meet specified performance standards. It is demonstrated through type approval markings applied to products by the manufacturer or in the case of vehicles, by a Certificate of Conformity (CoC) issued by the manufacturer. Additionally, vehicles claiming conformance to vehicle type approval will have the approval number marked on the vehicle identification plate (VIN Plate)

UKNI
United Kingdom Northern Ireland

3. General requirements

The VCA operates to standard terms and conditions that apply to all certification schemes.

VCA is the designated UK Type Approval Authority for automotive products and also a designated Technical Service for type approval testing and Conformity of Production in the United Nations (UN) scheme. VCA is also responsible for certification under UK type approval schemes.

As the UK Type Approval Authority, the Vehicle Certification Agency has the responsibility to issue UK type approvals on behalf of the Secretary of State for Transport under the UN and the UK type approval schemes.

Vehicle Certification Agency has its own in-house Technical Service which can undertake Conformity of Production validation for most UN regulations.

3.1. Management of impartiality

The impartiality of VCA operations is guaranteed in a number of ways.
All the members of the Board are appointed using Civil Service procedures which contain checks to ensure unbiased selection.
The Board, through the Chief Executive, acts on behalf of the Secretary of State for Transport and reports to Ministers who are responsible to Parliament and the public for their actions. All members of the Board and the staff of VCA are required, under Civil Service codes, not to engage outside their normal work in any directly related

business. Support to VCA may be provided on an ad-hoc basis by external people/bodies. The impartiality of these persons is considered before they provide any such support.

As an independent, impartial provider of conformity assessment services VCA undertakes to advise prospective customers of any potential impartiality issues affecting the project. VCA employees are bound by the Civil Service Code and these requirements are covered in internal processes.

If a customer perceives any threats to impartiality they should notify VCA as they occur. Failure to manage risks to impartiality has the potential to invalidate any product certification or at least require additional assessment and mitigation activities with potential cost implications for one or both parties.

3.2. Liability and financing

VCA operates as a financially viable business on a cost-recovery basis with the aim to operate at a small operating profit and meet strategic DfT objectives, VCA business plans, legal and accreditation requirements. The VCA's long-term financial strategy is to:

- continue to meet our agreed cost recovery agenda;
- generate agreed surplus in line with the Business Plan; and
- generate sufficient cash to fund investment.

VCA publishes annual accounts and business plans. These are all in the public domain.

3.2.1 Liability

If the customer fails to satisfy any VCA requirements either prior to inspection such that VCA cannot proceed, or otherwise such that VCA cannot issue the required approval, report, or other documents, then VCA will not be liable for any costs caused to the manufacturer. The manufacturer will be liable for VCA costs. In the case of the customer cancelling the contract, the customer will be liable for any VCA costs incurred to date. General liability falling to VCA through any fault or error in the service provided by VCA shall be limited to the monetary value of the contract for that service. Dates agreed for completion of contracts are given in good faith but VCA accepts no liability for late delivery no matter what the cause.

3.2.2 Insurance

VCA and its staff are covered by Crown Indemnity for the actions of VCA staff. VCA and the Crown accept no liability for the actions of non-VCA staff. Where VCA staff are required to attend or be within facilities or vehicles operated by customer staff, the customer must provide evidence of adequate motor and public liability insurance.

3.2.3 Fees

VCA fees will be charged in accordance with VCA's established fee schedules, based on time charges and/or fixed rates, dependent upon the service provided. The charging rate will be established in advance of work commencing. The fee may be agreed as a fixed contract price in advance of work commencing but, in that case, VCA reserves the right to amend the contract price to take into account any additional work that was not included in the contract work specification. Further information on charges relating to Conformity of Production can be found on the VCA website.

3.2.4 Payment of Fees

Customers known to VCA will be invoiced on completion of the work. Customers not known to VCA will be subject to credit checking and may be required to pay estimated fees in advance of work commencing. Payment will be required within 30 days of invoicing. Should invoices remain unpaid, VCA reserves the right to refuse to undertake further work until payment is received, including payment in advance for further work.

3.3. Non-discriminatory conditions

VCA operates its policies and procedures in order to not discriminate in any manner, and not to impede or inhibit access by customers/suppliers for assessment verification and certification services. VCA accepts contract work from all appropriate parties, without prejudice.

3.4. Confidentiality

Except as required by law or these certification scheme rules, all information provided to VCA by the customer relating to an approval or other work will be regarded as secret processes, designs and information of a technical nature, which necessitate a high degree of confidentiality. Both the customer and VCA acknowledge that disclosure of that information may prejudice the commercial interests of the customer and of VCA, such that both the customer and VCA are obliged to maintain that confidentiality. However, once approval has been issued, VCA will make available approval documentation and information, on request and without reference to the manufacturer or his representative, to the United Kingdom Department for Transport, other UK Government Departments, the Police, Courts and other official enforcement bodies in the United Kingdom, and to other Approval Authorities and relevant official bodies in other countries, and to others as required by law or any professional or regulatory obligation. If approvals are transferred to a new manufacturer from the declared manufacturer, VCA will require written confirmation of the transfer from a Solicitor, Liquidator, or Official Receiver before VCA will discuss the approval with the new manufacturer.

Where the law requires information to be disclosed to another party, the customer is informed of information provided as permitted by law. Customer confidentiality is achieved through:

- VCA employees and sub-contractors are required to sign a confidentiality agreement prior to undertaking any assessment, verification or certification activity
- Inclusion of a confidentiality clause within the contract between the VCA and the customer
- Inclusion of a confidentiality clause within the contract between the VCA and any sub-contractor that it employs

In accordance with regulatory requirements some customer information is published in the public domain (Section 6.8).

3.5 Conflicts of interest

If you are aware of any conflicts of interest which may affect your nominated VCA inspector, please raise your concern with the quality manager at complaints@vca.gov.uk within 3 days of receiving confirmation. If no concerns are raised within 3 days, VCA will automatically consider the plan accepted.

4. GB/UKNI Conformity of Production requirements

4.1. Quality System

The manufacturer and their assembly plants must have a quality system that covers the processes and resources required to achieve conformity of production. The manual should contain a quality policy and communicate the objectives to the relevant parties both internally and externally.
An ISO 9001:2015 Quality System is not required, but guidance on key elements of a Quality System can be found in ISO 9001:2015. Clauses listed below (4.2 – 4.19 excluding 4.12, 4.13 and 4.14) must however be part of the Quality System.
This clause (4.1, Quality System) will be assessed at each audit.

4.2. Control Plans

GB/UKNI type approval legislation requires documented control plans for each approval that specify intervals in which tests or associated checks necessary to verify continued conformity with the approved type are conducted.
These control plans are owned and controlled by the manufacturer.
The frequency of the testing should be a suitable period based on risk, and not exceed any requirements contained in any of the pieces of legislation you hold approvals to. Although the nature of inspections and tests is partially indicated in the legislation, it will also be specific to the nature of your product and its method of production.
Further information can be found on the VCA website.
In summary,
This control plan must:
a. Be owned and controlled by the approval holder
b. have a document reference, version level, be dated and be part of, or referenced

within, your Quality Management System
c. contain references to the legislation the item is tested / checked against
d. explain what tests and checks are to be done including the inspection of marking
e. outline the test frequency
f. identify who conducts the test
g. indicate the pass / fail criteria

This clause (4.2, Control Plans) will be assessed at audit with data checked at audit and annual review meeting / audit.

4.3. Supplier Selection

There must be in place a process, or set criteria, to allow suppliers to be selected. This not only includes the supply of parts for the build, but also covers external test facilities and third party contractors.
Further guidance can be found in ISO 9001:2015 clause 8.4.
This clause (4.3, Supplier Selection)will be assessed at each audit.

4.4. Incoming Goods

Incoming goods critical to the compliance of the product should be periodically checked to ensure that they continue to meet the required specification. This includes checking component approvals, or in the case of multi-stage build vehicles, the base vehicle chassis approval / extension level. Nonconforming product should be segregated from conforming product.
Further guidance can be found in ISO 9001:2015 clause 8.4.
This clause (4.4, Incoming Goods) will be assessed at stage 2 and recertification audits and may be sampled during surveillance visits.

4.5. Nonconforming manufactured product

Suitable processes must be in place to identify nonconforming product. There must also be in place a documented recall process that can identify affected product in the event of nonconforming product being released. This process, although may reference DVSA, must provide for information to be sent to VCA.
Further guidance can be found in ISO 9001:2015 clause 8.7.
This clause (4.5, Nonconforming Product) will be assessed at stage 2 and recertification audits and may be sampled during surveillance visits. Additionally recall information will be analysed during the annual review meeting / audit.

4.6. Competency

The manufacturer and their assembly sites must have a procedure for determining and recording competency of the staff conducting activities relating to conformity of

production. It is the sites responsibility to ensure that persons are competent on the basis of appropriate training, education or experience and that appropriate documented information is retained as evidence to support this assessment.
Further guidance can be found in ISO 9001:2015 clause 7.2.
This clause (4.6, Competency) will be will be assessed at stage 2 and recertification audits and may be sampled during surveillance visits.

4.7. Calibration

If any of the tests or checks required to demonstrate Conformity of Production require the use of equipment, then the equipment used must be calibrated. This calibration must be to international or national measurement standards. Calibrated items must be identified in order to determine their status and safeguarded from damage or deterioration that would invalidate the calibration status. If any external equipment is used, such as a weighbridge, this too must be included.
Further guidance can be found in ISO 9001:2015 clause 7.1.5.
This clause (4.7, Calibration) will be will be assessed at stage 2 and recertification audits and may be sampled during surveillance visits.

4.8. Change Control

Although change control will form part of your Quality System with respect to document control, we need evidence that suitable change control exists in relation to your type approval(s). This is change control with respect to legislation, design/manufacture and relevant administrative factors (i.e. address or CoP responsible person changes).
For legislation, it must cover how legislation is monitored to ensure that the product and its associated type approval paperwork continue to meet the requirements.
For design/manufacture, it must cover checking the implications on the approval by proposed changes to the design, manufacturing process or component parts.
In summary, this document must:
a. have a document reference, version level and be dated
b. Be part of, or referenced within, the Quality Management System
c. Describe how often the legislation is checked
d. Indicate where up to date copies of the legislation are sourced, including website addresses if appropriate.
e. Identify who is responsible for checking the legislation
f. Describe how changes to the legislation are compared against the product and paperwork
g. Describe how the impact of proposed change in design and manufacture process is evaluated in relation to the type approval, and outline how this is recorded.
h. Explain the action that is taken if there is an impact
i. Identify that changes can only be implemented after the type approval has been amended.

Further guidance can be found in ISO 9001:2015 clause 8.2.4.
This clause (4.8, Change Control) will be assessed at each audit.

4.9. Conformity Assurance

Manufacturer's / assembly plants should complete checks during the manufacturing process to ensure that the end product conforms. This is particularly important in areas where a final check cannot determine compliance.
This clause (4.9, Conformity Assurance) will be assessed at each audit.

4.10. Manufacturing Facility and Environment

The facility that is being used to manufacture the type approved product and/or check for compliance as part of control plan checks must be suitable for purpose. Sufficient light and space must be available to ensure that the necessary checks can be made accurately.
Further guidance can be found in ISO 9001:2015 clause 7.1.4.
This clause (4.10, Manufacturing Facility and Environment) will be will be assessed at stage 2 and recertification audits and may be sampled during surveillance visits.

4.11. Manufacturer's Representative Mandate

Manufacturers established outside of Great Britain must appoint a single representative established within Great Britain to represent the manufacturer before the VCA if seeking a GB approval. Likewise, Manufacturers established outside of Northern Ireland must appoint a single representative established within Northern Ireland or Europe to represent the manufacturer if seeking a UKNI approval . A mandate covering this appointment must be in place.

This document must:

a. be signed and dated by a member of the senior management team for each company
b. Confirm that the representative has access to the UK type approval and its attachments including certificates of conformity
c. Confirm the representative can, and will, if requested by the VCA, supply all information, documentation and any other technical specifications, including access to software and algorithms, that are necessary to demonstrate the conformity of production of a vehicle, system, component or separate technical unit
d. Confirm the representative can, and will, cooperate with the VCA or the market surveillance authority, at their request, on any action taken to eliminate the serious risk posed by vehicles, systems, components, separate technical units, parts or equipment covered by the mandate
e. Require the representative to immediately inform the manufacturer about complaints and reports relating to risks, suspected incidents or

noncompliance issues that relate to vehicles, systems, components, separate technical units, parts or equipment covered by the mandate

f. Allow the representative to terminate the mandate without penalty if the manufacturer acts contrary to its obligations under the Statutory Instrument.

Further guidance can be found in 2018/858/EU Article 15 and SI 2022 No. 1273 Part 4 Chapter 1.

This clause (4.11, Manufacturer's representative Mandate) will be assessed at stage 2 and recertification audits and may be sampled during surveillance visits. Changes to, and the contents of, mandates will also be analysed during the annual review meeting / audit.

4.12. Manufacturer's Marking

In addition to the statutory plate fixed to their vehicles and type-approval marks fixed to their components or separate technical units, manufacturers shall indicate their name, registered trade name or registered trademark and their contact address in GB and/or UKNI on their vehicles, components or separate technical units made available on the market or, where that is not possible, on the packaging or in a document accompanying the component or separate technical unit. Website addresses, QR codes, Radio-frequency identification (RFID) or access through human machine interfaces (HMI) are not permitted in isolation and may only accompany a physical address. Vehicles must be physically marked.

Further guidance can be found in 2018/858/EU Article 13, para 8 and SI 2022 No. 1273 Part 4 Chapter 1.

This clause (4.12, Manufacturer's Marking) will be assessed at each audit.

4.13. Importers Marking

Importers shall indicate their name, registered trade name or registered trademark, and their contact address on the vehicle, component, separate technical unit, part or equipment, or, where this is not possible, on its packaging or in a document accompanying the component, separate technical unit, part or equipment. Website addresses, QR codes, Radio-frequency identification (RFID) or access through human machine interfaces (HMI) are not permitted in isolation and may only accompany a physical address. Vehicles must be physically marked.

Further guidance can be found in 2018/858/EU Article 16, para 5 and SI 2022 No. 1273 Part 4 Chapter 1.

This clause (4.13, Importers Marking) will be assessed at stage 2 and recertification audits and may be sampled during surveillance visits.

4.14. Market Surveillance Representative

For the purposes of GB type-approval of vehicles, systems, components and separate technical units, a manufacturer established outside GB shall appoint a

single representative established within GB for the purposes of market surveillance, who may be the same as the representative appointed for the purposes of item 4.11 above. Similarly, for UKNI type-approval of vehicles, systems, components and separate technical units, a manufacturer established outside NI shall appoint a single representative established within NI or Europe. The requirements for this document are as points a-f in 4.11 above.
Further guidance can be found in 2018/858/EU Article 13, para 4 and SI 2022 No. 1273 Part 4 Chapter 1.
This clause (4.14, Market Surveillance Representative) will be assessed at stage 2 and recertification audits and may be sampled during surveillance visits.

4.15. Complaints Procedure

Manufacturers shall examine any complaints they receive relating to risks, suspected incidents or noncompliance issues with the vehicles, systems, components, separate technical units, parts and equipment that they have placed on the market.
Manufacturers shall keep a record of such complaints, including for each complaint a description of the issue and the details needed to precisely identify the affected type of vehicle, system, component, separate technical unit, part or equipment, and, in the case of substantiated complaints, manufacturers shall keep their distributors and importers informed thereof.
Further guidance can be found in 2018/858/EU Article 13 para. 7 and SI 2022 No. 1273 Part 4 Chapter 1.
This clause (4.15, Complaints Procedure) will be assessed at each audit.

4.16. Approvals Withdrawal Procedure

Where the production of a particular type of vehicle, system, component or separate technical unit is definitively discontinued, the manufacturer shall notify VCA that without delay.
Where a GB/ UKNI type-approval certificate is due to become invalid, the manufacturer shall notify VCA without delay.
Further guidance can be found in 2018/858/EU Article 35 para. 4 and 5 and SI 2022 No. 1273 Part 4 Chapter 1.
This clause (4.16, Approvals Withdrawal Procedure) will be assessed at stage 2 and recertification audits and may be sampled during surveillance visits. The operation of the procedure will also be analysed during the annual review meeting / audit.

4.17. Procedure for Identifying Economic Operators

There must be a process in place that records who has supplied you with a vehicle, system, component, separate technical unit or part. This may be via a purchasing system, and if so, this must be explained along with confirmation that data is backed up and retained for 10 years after production ceases. If you employ assembly plants

with their own purchasing, you are responsible for ensuring that this information is available for product they have built.
Additionally, these records must identify who you supplied the vehicle to.
Further guidance can be found in 2018/858/EU article 21 and SI 2022 No. 1273 Part 4 Chapter 1.
This clause (4.17, Procedure for Identifying Economic Operators) will be assessed at stage 2 and recertification audits and may be sampled during surveillance visits.

4.18. Procedure for Retaining CoP Records

There must be a process in place to compile and retain (for a period of 5 years) inspection records of tests and checks undertaken that are sufficient to demonstrate:

(a) Conformity of Production to the approved type
(b) compliance of certificates of conformity
(c) that the data in certificates of conformity issued by the holder are correct.

Further guidance can be found SI 2020 No. 818 Part 2 para 7 and SI 2022 No. 1273 Part 4 Chapter 1.
This clause (4.18, Procedure for Retaining CoP Records) will be assessed at stage 2 and recertification audits and may be sampled during surveillance visits.

4.19. Certificate of Conformity

Vehicle manufacturers must have a process for the generation of certificates of conformity. This certificate must be supplied in paper format with the vehicle, be the correct format / on the correct template, and have suitable security measures (see legislation in section 1). There must be a mechanism to produce duplicate certificates if requested.
In the case of multi-stage vehicle manufacturers (other than first stage) the certificates supplied at the previous stage(s) must be attached.
Further guidance can be found in 2018/858/EU articles 36 and 37 and SI 2022 No. 1273 Part 4 Chapter 1.
This clause (4.19, Certificate of Conformity) will be assessed at stage 2 and recertification audits and may be sampled during surveillance visits. Additionally, certificates will be checked for accuracy at annual review meeting / audit.

4.20. Provision of OBD information and Repair and Maintenance Information

Manufacturers shall provide to independent operators unrestricted, standardised and non-discriminatory access to vehicle OBD information, diagnostic and other equipment, tools including the complete references, and available downloads, of the applicable software and vehicle repair and maintenance information. Information shall be presented in an easily accessible manner in the form of machine-readable and electronically processable datasets. Independent operators shall have access to the remote diagnosis services used by manufacturers and authorised dealers and repairers.

Data must be available no later than six months after the whole vehicle approval has been issued. A charging structure must in place as indicated in the legislation mentioned in section 1 of this document, with VIN, OE parts numbers, OE naming of the parts, validity attributes (valid-from and valid-to dates), fitting attributes and, where applicable, structuring characteristics identified on the database.
In the case of manufacturers who hold EU type approval, please note that it will be necessary to identify the GB/UKNI approval number in addition to the EU approval number for any given model.
Further guidance can be found in 2018/858/EU Chapter XIV and SI 2022 No. 1273 Part 4 Chapter 1.
VCA staff must be given free unlimited access to access whether this clause (4.20, Provision of OBD information and Repair and Maintenance Information) has been satisfied, and it will be assessed at stage 2 and recertification audits and may be sampled during surveillance visits. Additionally, access etc will be checked at annual review meeting / audit.

4.21. Reusability, recycling and recovery

(M1 and N1 vehicles only excluding SPV, N1 multistage and medium and small series vehicles)

Satisfactory arrangements and procedures, in accordance with point 3 of Annex 5 to UNECE Regulation 133, must be in place to manage properly the reusability, recyclability and recoverability of M1 and N1 vehicles. A certificate named "Certificate of Compliance with Annex 5" (the "certificate of compliance") must be granted to the manufacturer to cover their arrangements and procedures. A check that the certificate is in place, is suitable, and in date will be made as part of the CoP checks. Further guidance can be found in Statutory Instrument 2022 NO. 1273 Part 3 Schedule A1 and UNECE R133.
This clause (4.21, Reusability, recycling and recovery) will be assessed at stage 2 and recertification audits and may be sampled during the annual review meeting / audit.

5. CoP Certification Process

5.1. Pre-application

Prior to the formal application, VCA have a number of engineers and auditors that are available to discuss any points or answer any specific questions on the scheme. This may take the form of informal discussions or more formalised "gap analysis". Questions relating to predicted timescales and costs can also be had at this stage.

5.2. Application

Formal application requires completion of a VCA application form, followed by VCA's

provision of a quotation (this may be to confirm or revise the initial estimate) Mutual agreement to proceed is then established using a contract linked to the quotation and agreement to specific terms and conditions that will apply for the certification period (usually three years) once a certificate has been issued. A purchase order may also be required to facilitate invoicing arrangements.
The application form contains a number of key questions that VCA require in order to determine how the Conformity of Production is to be assessed. In the case of vehicle manufacturers, a pre-meeting check sheet will be sent to assist with this activity.
The application will be assessed by a Compliance Engineer in order to develop an audit programme that covers all of the sites and subjects that you require. An audit programme for the full certification cycle of 3 years will be developed to clearly identify the audit activities required to demonstrate that the Manufacturers management system fulfils the requirements for certification to GB/UKNI Conformity of Production.
The audit programme for the initial certification consists of a two-stage initial audit (stage 1 and stage 2 as below), surveillance audits in the first and second years following the certification decision, and a recertification audit in the third year prior to expiration of certification. The first three-year certification cycle begins with the certification decision. Subsequent cycles begin with the recertification decision
The determination of the audit programme and any subsequent adjustments shall consider the size of the manufacturer and the number of effective personnel (see definitions), the scope and complexity of its management system, products and processes as well as demonstrated level of management system effectiveness and the results of any previous audits.

5.3. Stage 1 (also known as GB/UKNI CoP Phase 2)

Once a formal application has been made a compliance engineer will be assigned and be responsible for arranging an evaluation of documentation (document review) and in many cases an "on site" audit of the systems applicable to each assembly plant. The documentation is reviewed against the requirements of this publication (specifically section 4) to verify that an appropriate system has been established. During this review the responsibility for key CoP operations will be determined and recorded to ensure that the correct elements are being assessed at the correct locations.

Upon successful completion of this stage, an Initial Assessment certificate will be issued outlining the sites and subjects applicable for the manufacturer. **This document will permit the issuance of GB/UKNI type approvals but will not constitute GB/UKNI CoP clearance / certification.** Full clearance will require progression through the following section.

If more than 12 months elapses between a stage 1 and stage 2 audit then a review may be conducted to verify that no significant changes have been made along with

checking key operations are being undertaken.

5.4. Stage 2 Audits (also known as GB/UKNI CoP Phase 3)

The stage 2 audits are carried out to agreed and pre-arranged schedules to confirm that procedures have been implemented in accordance with the requirements. For the assessment, VCA assessors evaluate the quality management system for the capability to deliver consistently controls necessary to ensure the manufactured product meets requirements. Key elements of assessment include

- Review system documentation used to establish controls
- Review and evaluate system records including test evidence used to:
  demonstrate product meets requirements
  demonstrate the quality management system remains effective
- improvement actions including corrective actions are being taken
- Independent testing or witness of product testing.

The assessment will include all clauses of section 4 of this document.
Where the system does not meet the requirements, the detailed points will be recorded as nonconformances and discussed with the organisation's representatives. A formal final meeting is held to convey the assessor's findings. Before a certification decision is made, and before the certification is issued, all nonconformances will require appropriate corrective action to have been taken and a final check made that applicable contractual and certification terms are signed in relation to the scope assessed.
If multiple assembly plants are included on the CoP application, and these share all of the elements of section 4, it is possible to reduce the number of sites requiring an audit before certification is granted. In these instances, the sample size is the square root of the number of sites rounded up to the next whole number. If the sites are not the same legal entity as the Manufacturer, then all sites shall have a legal or contractual link with the Manufacturer and be subject to a single management system, which is laid down, established and subject to continuous surveillance and internal audits by the Manufacturer. This means that the Manufacturer has rights to require that the sites implement corrective actions when needed in any site.
If not all elements of section 4 are shared, then each site must be audited.
If multiple type approval manufacturers are part of the same legal entity it may be possible to grant a group certificate to GB/UKNI CoP.

5.5. Surveillance Audits

To confirm that each of the manufacturers assembly plants maintain the quality system in accordance with the standard, surveillance audits will be carried out yearly. These visits will be on-site at least once every three years and remote on

years not visited.
If during audit serious issues are found, then more frequent visits may be required at one or more sites.
The schedule will be agreed with the manufacturer and will be adjusted to give priority to the areas where nonconformances were raised previously. Not all clauses of section 4 will necessarily be evaluated at surveillance audits. For certification to be continued, any nonconformances will be reported and followed-up.

Additionally, vehicle manufacturers will be required to hold an annual review meeting / audit to look at areas that full solely under manufacturer responsibility (i.e. Certificates of conformity) as well as quarterly meetings if emissions approvals are held.

Quarterly meeting content

- Informal discussion and not an audit
- Likely to be conducted with the Manufacturer but could be their representative
- Required for all vehicle manufacturers with emissions approvals but could be required for other subjects in the future
- “Touch point” to understand upcoming changes (sites, scopes, names)
- Cover progress against testing requirements (emissions)
- Aim is to reduce last minute problems
- Should be around 1 hour in duration
- Likely to be conducted via videocall

Annual review meeting / audit details

Areas that will be assessed during this activity include:

- ISO performance / Audit results
  - NC’s raised
  - RC / CA / PA
- CoP test schedules
  - Completion rates for proceeding year
  - Schedule for upcoming year
- Test data sampling
  - Review of tests conducted (non-emissions)
  - Sample of test reports (internal and external)
- Recalls / Nonconformance
  - Completion rates of campaigns
  - Nonconformances identified during CoP tests
- Certificates of conformity
  - Check of content (One per vehicle type minimum)
- RMI and OBD
  - Access to information
  - Updates

5.6. Re-assessment / Re-certification Audits

After each three-year certification period, if the certification is to continue, a formal re-certification review is necessary. Towards the end of the period, VCA and the manufacturer will jointly review the surveillance visits, their results and effectiveness. This is to determine the status of the systems and identify additional assessment activities needed to confirm full conformance to the standard at that time of renewal. Normally, the additional assessment needed (including a document review) is added to the last planned surveillance visit. Any nonconformances will be reported and followed-up as above. All clauses of section 4 of this document will be re-assessed at recertification.

For any nonconformity, VCA shall define time limits for correction and corrective actions. These actions must be implemented and verified prior to the expiration of certification.
When recertification activities are successfully completed prior to the expiry date of the existing certification, the expiry date of the new certification will be based on the expiry date of the existing certification. The issue date on a new certificate shall be on or after the recertification decision.
If the VCA has not completed the recertification audit or is unable to verify the implementation of corrections and corrective actions for any major nonconformity prior to the expiry date of the certification, then recertification shall not be recommended, and the validity of the certification shall not be extended. The Manufacturer shall be informed and the consequences will be explained.
Following expiration of certification, VCA can restore certification within 3 months provided that the outstanding recertification activities are completed, otherwise at least a stage 2 shall be conducted. The effective date on the certificate shall be on or after the recertification decision and the expiry date shall be based on prior certification cycle.

All outstanding nonconformances must be closed at the time of re-certification, the contract terms renewed and a new surveillance schedule produced for the next three-year certification period. A new certificate will then be issued.

If multiple assembly plants are included on the CoP application, and these share all of the elements of section 4, it is possible to reduce the number of sites requiring an audit before recertification is granted. In these instances, the sample size is the square root of the number of sites rounded up to the next whole number. If the sites are not the same legal entity as the Manufacturer, then all sites shall have a legal or contractual link with the Manufacturer and be subject to a single management system, which is laid down, established and subject to continuous surveillance and internal audits by the Manufacturer. This means that the Manufacturer has rights to require that the sites implement corrective actions when needed in any site.
If not all elements of section 4 are shared, then each site must be audited.

If Conformity of Production is allowed to lapse then the manufacture of product carrying a label indicating approval (i.e. approval label or VIN plate) cannot be undertaken until Conformity of Production is resumed. During the period in which you do not hold Conformity of Production Certification, your approvals will not be valid.

5.7. Reporting

VCA provides an assessment report from each audit that includes

- a brief description of the Manufacturer / Assembly plant
- a statement of the requirements to which conformity has been assessed
- an executive summary of the overall findings (conclusions) of the assessment, including comments on the effectiveness of the customer's production process controls and management system associated with production of the product, and a summary of findings identified during the assessment
- details and results of evaluation activities carried out
- details of personnel and equipment used in assessment
- Information on fulfilment of requirements
- Identification of any inspection and testing activity including witness

5.8. Production samples

Where in the course of surveillance VCA selects samples for inspection and testing. The samples shall be:

- taken in accordance with the standard;
- representative of production;
- identifiable to allow for product traceability

5.9 Combining GB/UKNI Audits with EU/ECE Audits

With the agreement of VCA, it may be possible to combine GB/UKNI audits with those for ECE and/or EU. In these circumstance additional time will be allocated, and charged, to cover this. Please note that VCA must conduct these audits and we can only guarantee acceptance of audits with approval authorities for which VCA are an appointed Category C technical service.

6. Certification

6.1 Records

VCA gathers evidence of product conformity to prepare a technical file as evidence of the basis for the decision. Records are managed in accordance with VCA's management system procedures.

6.2 Technical Review

When VCA's audit team believe sufficient evidence is available to support a

certification decision they will call for a technical review. The person(s) conducting the review must have sufficient knowledge and experience to understand:

- any report(s) and findings;
- any additional risk arising from multiple findings;
- scheme requirements; and
- test requirements, methods and data
- nonconformity significance and impact on type approval

The audit team make recommendation to the VCA assessment team whether certification should be awarded and, if so, the scope of that certification.

6.3 Certification Decision

Certification decisions are based on records of evidence of conformance with requirements in accordance with section 4 and standards in Section 1.
The audit team will prepare a technical file outlining the findings from relevant audits along with any submissions made including Nonconformance closure. The decision maker will either grant clearance or request further information to be able to make a decision. This information request will be made to the audit team.
In the event that suitable evidence cannot, or will not, be supplied to close any nonconformances certification will be refused.

6.4 Ownership

All approvals, reports or other documentation issued by VCA shall be regarded as owned by VCA.

6.5 Use of the VCA Name

The VCA logo must not be used by third parties.
The VCA name may be used in reference to Type Approval documents obtained from VCA, for example, Type Approval Certificates, Test Reports or Facility Appraisals, and a link to the VCA website is permissible. Further information is available on the VCA website: Use of the VCA logo

6.6 Interpretations and advice

VCA interpretations and advice on Conformity of Production issues will be applicable only to clearance and approvals issued by VCA. VCA makes no commitment to VCA advice or interpretations being applicable to approvals issued by Approval Authorities other than VCA. In offering advice on draft legislation, VCA will not be liable for the effects of subsequent changes to that draft legislation. In interpreting the law, advice given by VCA can be seen only as VCA's opinion. Interpretation of the law in Great Britain is the prerogative of the Courts.

6.7 Directory of certified products

VCA maintains records of manufacturers certified under these scheme rules. This directory is maintained internally.

6.8 Publicly available information

Upon request, VCA will confirm the status of GB/UKNI Conformity of Production certificates that display the UKAS mark. Confirmation will be given of the manufacturers name, city and country location and the scope certified. This information may also be available via UKAS's website.
However, details of any documentation reviewed will not be made publicly available without prior customer agreement. Confidentiality requirements are covered in section 3.4.

7 Claims for certification

Customers may make no claims of certification until Conformity of Production has been issued by VCA. Until this time customers should agree acceptable wording with VCA to reflect project approval status.

After a certificate is issued customers should ensure that information about CoP clearance is complete and accurate. The information included on the certificate for should be used where its absence could be misleading. It must not be implied, deliberately or otherwise, that a product holds type approval by presentation of a conformity of production certificate.

Any certificate conditions should be referenced in any claims for certification unless they have been resolved following certification.

Where post certification activities identify potential nonconformity with requirements the customer shall prevent further active claims to holding certification until the situation is resolved.

8 Use of certification marks

8.1 VCA Logo

All VCA certification documents and marks remain the property of VCA.
VCA, along with all other arms of the UK Government have adopted the Royal Coat of Arms logo. Unlike the previous version of the logo, the Royal Coat of Arms logo may only be used by Government Agencies and certain named third-parties. Use in any commercial context is strictly forbidden.

The legislation that governs the use of the Royal Coat of Arms can be found in the Trade Marks Act 1994 (see Section 99(1) of the Act).

Further guidance can be found here:
https://www.royal.uk/sites/default/files/media/royal_arms_blue_booklet20152.pdf

8.2 UKAS Logo

Upon granting a Conformity of Production certificate to this GB/UKNI scheme, VCA may permit manufacturers to display a certification mark as well as the UKAS mark on documents, advertising material etc. Use of this mark is voluntary and cannot be used on products or their primary packaging. It is paramount that use of the mark does not make misleading statements regarding certification.

If you choose to use the mark, the following conditions apply:

1. The dark and light variation between text and the remainder of the mark should be preserved.
2. The mark should not be altered in any way. The accreditation mark (UKAS Logo) must not be used without the certification mark (VCA text).
3. The marks shall normally have a minimum height of 20 mm. If due to limitations of space a reduction is required, the proportions must be maintained, and the mark must be legible.
4. The mark may be used on correspondence, advertising and promotion, but only as this relates to the Manufacturer, locations and scope of registered activities that are detailed on the Manufacturers Conformity of Production certificate.
5. The mark must not be used to imply we have certified Manufacturer's products and must not be used on laboratory or other test certificates issued by the certified Manufacturer.
6. The accreditation mark must not be used on flags, buildings or vehicles.
7. The accreditation mark must not be used for promotional items such as diaries and calendars.

The Manufacturer commits itself to stop the use of the VCA conformity mark for Conformity of Production if it is justifiably asked to do so by VCA or when the validity period of the Conformity of Production Certificate expires.

When the scope of application of the Conformity of Production Certificate covers only part of the products and services or part of the Manufacturers activities, the Quality System of the Manufacturer must contain a reference and the Manufacturer is obliged to notify this fact to its clients, in cases of supply of products and services not included in the scope of certification of the Conformity of Production certificate. The notification must be carried out before the order of the respective products and services.

Incorrect references to the Conformity of Production certification, certification marks or misleading use of certificates in advertisements, sales brochures, etc. are not acceptable.

VCA may revoke the Manufacturers licence to use the Marks and terminate the Certificate if the Manufacturer fails to comply with any of these terms and conditions,

or if the Manufacturer becomes bankrupt or makes an arrangement with its creditors or enters into liquidation (except for purposes of reconstruction) or has a receiver appointed, or if VCA loses its relevant accreditation.

Subject to availability, a copy of the mark will be supplied upon request after certification has been granted. Details on how to apply will be sent with a copy of the Conformity of Production Certificate.

9 Nonconformity, appeals and complaints

9.1 Nonconformity

For any initial or surveillance assessment VCA informs customers of the names of members of the assessment team with sufficient notice to appeal against the appointment of any team member.

All technical queries raised during assessment and evaluation (Section 6) are managed using the nonconformity process in this section. At all on-site assessments, the team holds opening and closing meetings with the customer's representatives and includes any reports on the current state of nonconformity with requirements.

Where a technical query is identified, VCA provides an opportunity for the customer to question the nature and content of the technical query. For all technical queries forming part of the assessment report VCA agrees with the customer a plan and timetable for responding to and resolving the technical query. This plan shall ensure the customer takes all necessary steps to prevent the provision of nonconforming products and, commensurate with the risks, notify significantly affected parties as soon as practicable.

Where a nonconformity cannot be resolved the certification decision will normally be not to certify (Section 6.3) or to withdraw/terminate certification (Section 11).

9.2 Appeals

Where a customer believes a nonconformity has been incorrectly raised or a certification decision is incorrect they are encouraged to use VCA's appeals process. All VCA personnel will be able to provide further information on how to initiate an appeal. Where a customer wishes to raise a confidential appeal they may direct it to the VCA Quality Manager.
All appeals are handled independently in accordance with VCA's management

system up to and including access to VCA's Certification Advisory Committee and the VCA Board. In the event an appeal remains unresolved then VCA will direct a customer to the regulatory appeals process. Reference VCA Complaints and Appeals https://www.vehicle-certification-agency.gov.uk/complaints-and-appeals/

Please note that appeals regarding a decision made by VCA will normally only be considered if received within 10 working days from the date of the decision appealed against.

9.3 Appeals Escalation

If you think you've been treated unfairly or have received poor service from VCA, you can ask for an Independent Complaints Assessor (ICA) to review your complaint. The ICA will provide assurance that the VCA has followed proper procedures.

The department uses the services of Independent Complaints Assessors, who are part-time and are not civil servants. This is a free, independent, and impartial service.

If you want to complain your first step should always be to go to DfT or the agency or body itself to handle the matter. ICAs are there to review the way that the department or agency handled your complaint prior to their final response. Further information on the DfT ICA scheme can be found here: https://www.vehicle-certification-agency.gov.uk/company-policies/independent-complaints-assessors-for-the-department-for-transport/

9.4 Complaints about VCA

VCA maintains a customer complaint system related to the service provided and independent of the appeals process. All VCA personnel will be able to provide further information on how to initiate a complaint. Where a customer wishes to raise a complaint confidentially they may direct it to the VCA Quality Manager.
All complaints are handled independently in accordance with VCA's management system up to and including access to VCA's Certification Advisory Committee and the VCA Board. In the event a complaint remains unresolved then customers may complain to UKAS, the accreditation body for this scheme, again VCA personnel will be able to provide further information on how to do this. Reference VCA Complaints and Appeals https://www.vehicle-certification-agency.gov.uk/complaints-and-appeals/. When making a complaint, please make sure that you provide your full contact details, our work order number, a full description of the problem and an indication of the outcome you are seeking.

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The department uses the services of Independent Complaints Assessors, who are part-time and are not civil servants. This is a free, independent, and impartial service.

If you want to complain your first step should always be to go to DfT or the agency or body itself to handle the matter. ICAs are there to review the way that the department or agency handled your complaint prior to their final response. Further information on the DfT ICA scheme can be found here: https://www.vehicle-certification-agency.gov.uk/company-policies/independent-complaints-assessors-for-the-department-for-transport/

9.6 Complaints about a VCA customer

Customer system

As part of its management system, customers are expected to have a process to identify, capture and resolve complaints relating to the project scope and requirements. The customer should keep records of any complaints it is aware of that relate to compliance with scheme requirements including any actions taken to resolve any nonconformity.

VCA system

Where VCA receives a complaint relating to a customer, project scope and requirements we review the complaint to decide whether the complaint relates to VCA certification activities. If so we acknowledge receipt of the complaint and investigate by gathering necessary information to enable a decision to be made independently on the complaint validity.

VCA will notify the complainant of the result of their complaint and of any follow up activity (subject to confidentiality requirements). In the event the complainant is not satisfied VCA will advise them of routes to appeal or escalate the complaint and will manage or co-operate with subsequent stages.

In the event the complaint requires action with VCA's customer and / or a project then VCA will manage this process respecting any confidentiality requirements.

10 Change management

10.1 Changes affecting certification

VCA's Type Approval and Conformity of Production scheme have been based on

normative references (Section 1). In the event requirements change these scheme rules will be reviewed by VCA and, if necessary, updated. Similarly in the event of changes to VCA processes referenced in these scheme rules (e.g. use of VCA marks) or to scheme rules themselves VCA will review the potential impact on existing customers and notify affected customers at the time of the change. Any necessary transition arrangements are notified at the same time.

Transition arrangements include new designs, modifications to existing designs, additional audits or extended audit surveillance, and expiry of certification previously issued by VCA.

In the event that existing customers are unwilling or unable to meet additional scheme requirements including transition arrangements then VCA will work with the customer to withdraw certification in accordance with Section 11 of these rules.

10.2 Additions or alterations

Conformity of Production clearance is granted to cover specific sites for specific activities. Any changes to the sites that you use, or if you require new subjects on the clearance, need to be added to your Conformity of Production clearance before your type approval. Once the revised type approval has been received, production can commence. Examples of changes that require an update to Conformity of Production clearance are:

Variables	Change
Design	Any change to design
Material	Any change to approved engineering material
Manufacturing method	Any change to approved manufacturing process
Legislation	Addition of new subjects
Personnel	Changes to CoP contact
Manufacturer	Change to Manufacturers name and/or address
Assembly Plant	Change to assembly plants name and/or address
	Addition or deletion of assembly plants

10.3 Alterations to Approved Specification

Once a product has been approved by VCA, the specification of that product embodied in the approval documentation cannot be altered without re-approval by

VCA. VCA must be notified of any deviation from that specification that the manufacturer wishes to implement and will consider whether retesting is necessary in order to approve the deviations. If VCA is not notified, then the deviations will not be covered by the approval.

11 Revoking certification

11.1 Termination, reduction, suspension or withdrawal of certification

Where identified nonconformity or complaint from external parties indicate inability to consistently produce product conforming with requirements VCA will take appropriate action, including but not limited to:

- extraordinary surveillance assessment (in accordance with Section 6)
- additional product testing (in accordance with Section 5.8)
- Re-evaluation of the certification decision (Section 6.3)

The findings from the above actions are handled in accordance with section 9 above.

Where a customer terminates certification or if VCA suspends or withdraws certification all certificates and certification documents shall be returned to VCA. The customer shall cease to make any claims to certification (Section 7) and cease use of VCA marks (Section 8). VCA will contact relevant public and regulatory bodies and withdraw any references to continuing customer certification.

In the event certification is suspended VCA will appoint and communicate to the customer a named VCA employee who will work with the customer during any suspension period. VCA will make clear what is required to:

- end suspension and restore product certification
- manage claims for certification and handle enquiries on product certification

All VCA and customer actions including evaluation and assessment (Section 6) in support of certification reinstatement shall be carried out in compliance with these scheme rules. Reinstatement of product certification requires a further certification decision (Section 6.3).

12. Certificate Acceptance

The Certification Body will issue a Conformity of Production certificate to a Manufacturer that successfully demonstrates to them conformance with this scheme. It is at the discretion of a Type Approval Authority as to whether they accept VCA

CoP Certificates issued in line with this GB/UKNI CoP scheme for issuance of type approval certificates. Acceptance by VCA, as the Type Approval Authority for GB/UKNI approvals, is dependent on holding in date clearance for all relevant sites with suitable scope in place for the approvals sought.