



Rock Fall®

INDUSTRY DEFINING SAFETY FOOTWEAR

**Rock Fall
Product
Safety
Incident Plan**

Product Safety Incident Plan

Rock Fall endeavour to always supply the highest quality product but on the occasion that we receive information about a potential safety issue relating to our products we will act upon that information ensuring an effective response.

A safety complaint is when a product has caused an injury or a where it has been identified that a product has a potential to cause injury.

Aims:

1. Stop Distribution and sale of the affected product
2. Notify affected parties
3. Remove product from market, warehouse and distribution
4. Dispose of Product
5. Analyse what happened and implement a CAP to prevent it happening again
6. Evaluate the success of the recall

Traceability Plan:

Rock Fall can trace their products via the product label which is securely attached to each pair of boots sold. This label identifies the style and the batch code.

Customer contact information is captured via the OrderWise stock system and includes the customer's name and contact details.

Product Safety Monitoring Plan:

All orders/batches delivered on all styles are QC due diligence checked. These checks are conducted and documented by the QA and Compliance Manager and identify any potential product safety issues that may arise during the products use. Styles are also due diligence tested to EN ISO standards based on risk assessment, these tests are conducted by 3rd party test houses.

Warehouse, Sales, Operations and Shop staff feedback any information relating to product safety that they may notice to the Operations Manager.

Sales and marketing staff feedback information directly from the customers, including general comments, faulty goods and reports of incident and accidents. This incoming information is documented via e-mail correspondence, completion of Returns Forms and recorded in the Returns Report on OrderWise.

Note that returns may be for manufacturing faults or over ordered stock and not necessarily product safety issues, this returns information is analysed to assess if any persistent returns could result in a product safety issue.

Other possible sources of information include consumer bodies, regulators, third party safety specialists, insurance companies, social media and on-line product reviews.

If a customer reports an issue they will be requested to complete a customer Product Safety Reporting Form (Appendix 1)

Legal notification Plan:

If it becomes clear that a product may have been placed on the market that is unsafe and will potentially need a product recall, then it is Rock Fall's responsibility to notify the relevant MSA. (Market Surveillance authority), BSIF, within 24 hrs. Rock Fall must provide all the information on any action taken, precise details to identify the product and batch, traceability information and a full description of the risk that could be posed.

Incident Management Plan:

If a potential safety incident is identified a Product Safety Response Form will be completed (Appendix 2)

All the available information is assessed by the QA Manager and Operations Manager and a decision is made on the level of response required:

EXAMPLE SCENARIOS:

Major Safety Complaint resulting in serious injury:	Two Safety Complaints received no injuries reported:
Red Alert- action taken must be immediate	Facts to be reviewed by the QA Manager, with team input, to include: Risk assessment, complaint received, test data, inspection reports, samples, EN ISO standard, 3rd party input.
Facts to be reviewed by the Recall Team to include: Risk assessment, complaint received, test data, inspection reports, samples, EN ISO standard, 3rd party input.	No further action required - contained incidents without risk to health or red alert follow product recall corrective action plan
Product recall corrective action plan to be implemented	

All Investigations will be documented and a Product Safety Report (Appendix 3) completed and issued when necessary.

Recall Team:

Richard Noon (Director) and Matthew Noon (Director) will review all the information available to them to assess the potential risk to the consumer. If they are not available, then the Operations Manager and QA and Compliance Manager will be called upon.

A risk assessment will be conducted and documented to establish the severity of the potential hazard and the potential harm to health resulting from the hazard. In some cases, the risk is obvious, and a risk assessment is not required before corrective action is taken. It may be that a 3rd party authority is required to make an assessment. Rock Fall would look upon SATRA to provide that assistance. If the potential risk to health is identified as a particular risk (e.g. Fire) an independent specialist in the risk involved would be considered.

Product Recall Risk Assessment:

The Recall Team will carry out the risk assessment.

Gather all the information available including technical files, product history, pictures, samples, reports. All information and evidence to be kept together in one file.

- Describe the hazard/s
- Identify the consumer at risk
- Describe Injury scenario
- Determine the severity of the possible injury
- Determine the probability of the injury scenario

- Overall assessment to determine the risk level
 - Serious Risk
 - High Risk
 - Medium Risk
 - Low Risk
- The risk assessment will be documented and will be completed using the risk assessment form (Appendix 4)

Product Recall Corrective Action Plan:

A decision must be made by the Product Recall Team on how to proceed within 24 hours of the first alert to the incident using all the available evidence.

- Decide whether it is an isolated issue and take action to deal with the individual affected.
- Decide whether there is a potential risk to health.
- Decide if the product(s) need to be recalled and how that will be implemented.
- Decide whether to Isolate stock in warehouse.
- Establish how will customers be contacted, directly and or via distributors.
- Establish how faulty goods are to be recalled or if they are to be replaced.
- Contact distributors and ask them to isolate stock.
- Establish how customers are recompensed. E.g. product replacement.
- Decide how returned products are to be disposed of.
- Decide whether other styles may be affected, for example, if using a common component.
- Inform supplier of the affected product and issues that have arisen, isolating and reviewing components where necessary.

Communication Plan:

An effective communication document and media plan will be distributed to all relevant parties within 24hrs of a product recall decision. The Marketing Manager, Paul Wilson and team will be responsible for this with guidance from the directors

The communication will be sent out to the following within 24 hrs of a decision to product recall.

- The MSA
- Internal staff
- Customer, distributors, suppliers
- Consumers
- Media

Contact List (Appendix 5)

Consumers and media will not be contacted until the other parties are briefed and ready to deal with enquiries.

Records must be kept of parties contacted and responses given.

The communication plan created will include:

- A specific Frequently Asked Questions and general Q&A for distributors and end-users will be created at rockfall.com/recall this will remain available for 12 months
- Electronic mail communications to all current customers
- General notices on social media
- Account Managers will call all distributors that have ordered the affected batch within 48 hours after a product recall decision.

For recall documents and communications guidelines see (Appendix 6)

Training Plan

It is important that managers communicate the importance of reacting to any potential incident to all members of the staff and for those team members to know what is required from them.

As such Rock Fall will conduct annual training to communicate to staff members what their responsibilities are and what action may be required from them. If staff members change or there are new starters, the product recall plan must be communicated to them.

This training will be documented.

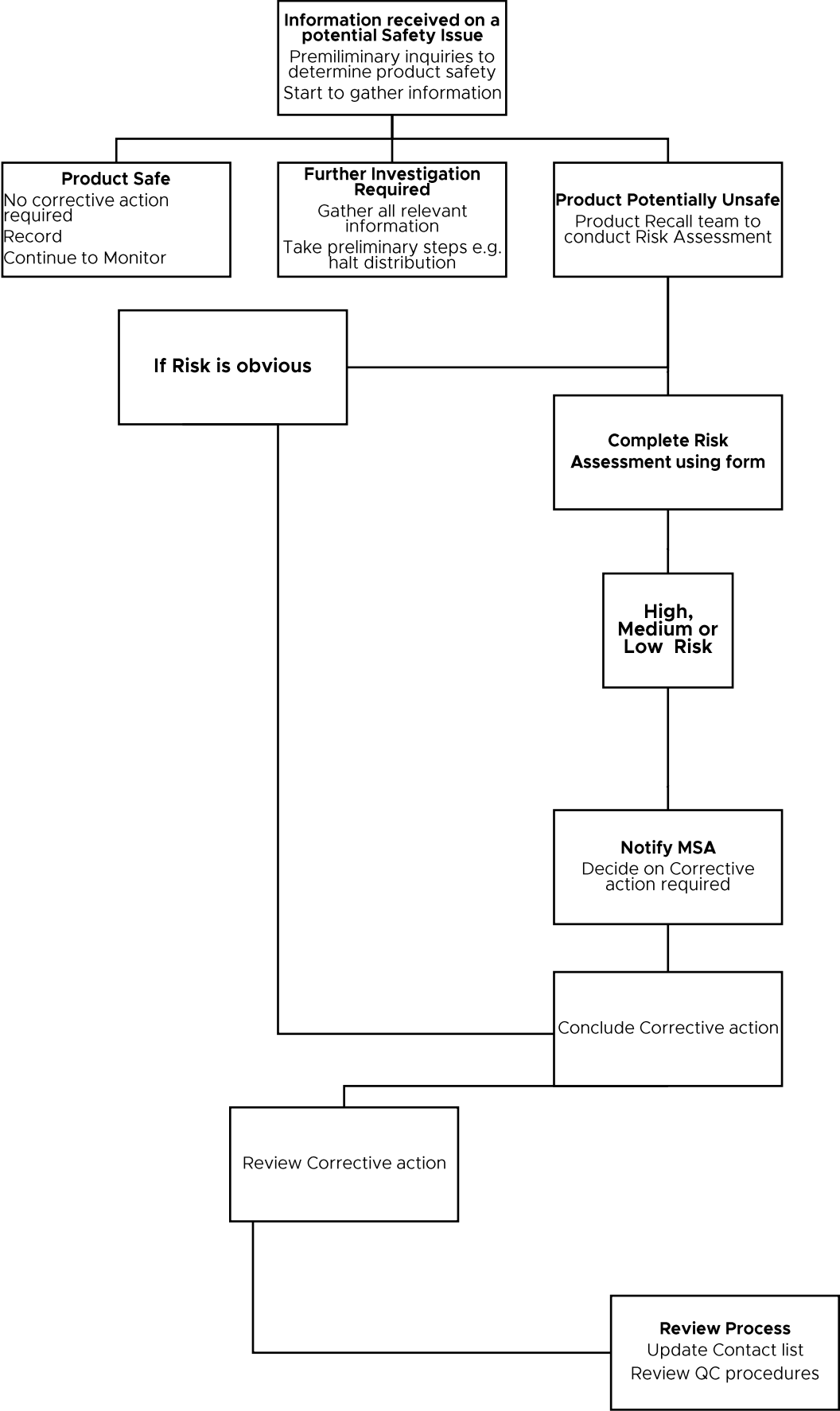
Review Plan

Have all outcomes been achieved:

- Has all product been recalled and received?
- Are all products out of distribution?
- Has the target outcome been achieved?
- Were all communications timely and effective?

This PSIP will be reviewed on an annual basis and this review and its outcomes will be documented.

Product Safety Process





Rock Fall®

INDUSTRY DEFINING SAFETY FOOTWEAR

**Rock Fall Product
Safety Incident Plan
Appendices**

Customer Product Safety Reporting Form



Rock Fall UK Ltd, Major House, Unit 1/3, Wimsey Way,
Alfreton, Derbyshire, DE55 4LS, United Kingdom
T: 01773 608616
E: sales@rockfall.com
W: rockfall.com

For completion by customer

Complaint rec'd by		Position	
Company Name		Date	
Telephone number		Email	
Complaint made by			

Product details

Style Ref	Style Description	Batch Number
Size	Date of Purchase	Method of complaint
		Phone/e-mail/website

Details of Complaint/Issue Found

Please include any supporting information, documents, photographs etc.

Injury involved?	<input type="checkbox"/> Y	<input type="checkbox"/> N	
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Details of Injury:

ACTION

Internal Product Safety Reporting Form



Rock Fall UK Ltd, Major House, Unit 1/3, Wimsey Way,
Alfreton, Derbyshire, DE55 4LS, United Kingdom
T: 01773 608616
E: sales@rockfall.com
W: rockfall.com

For completion by Rock Fall

Complaint rec'd by		Date	
Telephone number		Email	
Complaint made by			

Product details

Style Ref	Style Description	Batch Number
Size	Date of Purchase	Method of complaint
		Phone/e-mail/website

Details of Complaint/Issue Found

Please include any supporting information, documents, photographs etc.

Injury involved?	Y	N	
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Details of Injury:

ACTION

Product Safety Report



Rock Fall UK Ltd, Major House, Unit 1/3, Wimsey Way,
Alfreton, Derbyshire, DE55 4LS, United Kingdom
T: 01773 608616
E: sales@rockfall.com
W: rockfall.com

To be completed by Rock Fall Staff Following investigation

Report Author		Position	
Email		Report Date	
Distributor name and contact		Email	
End-user		Date complaint made	

Product details

Style Ref	Style Description	Batch Number
Size	Date of Purchase	Method of complaint
		Phone/e-mail/website

Details of Complaint/Issue Found

Please include any supporting information, documents, photographs etc.

Investigation results

Corrective Action

Preventative Action Taken

Signed		Date:	
Position			



Rock Fall UK Ltd, Major House, Unit 1/3, Wimsey Way, Alfreton, Derbyshire, DE55 4LS, United Kingdom
 T: 01773 608616
 E: sales@rockfall.com
 W: rockfall.com

RISK ASSESSMENT FORM

REFER TO: EU RAPEX GUIDELINES ON RISK ASSESSMENT AND BSI CODE OF PRACTICE ON CONSUMER PRODUCT SAFETY RELATED RECALLS WHEN COMPLETING THIS FORM

Product Details	Hazard	Customer Risk	Other potential user risks	Harm Scenario	Severity of Injury	Probability of Injury
Image of product			Comments and conclusion			

Contact List

Internal

Richard Noon – Director| Recall team

Matthew Noon – Director | Recall Team

Debbie Slack – Operations Manager

Carol Harris – Quality Assurance and Compliance Manager

Darren Millington – Warehouse Manager

Paul Wilson – Marketing Manager

Shantell Williams - Internal Sales Account Manager

Adam Walker - Internal Sales Account Manager

Paul Seedhouse – Field Sales Manager

Carolyn Coupland – Field Sales Manager

Julia Mason – Order Processor

Wendy Harmieson – Operations Assistant

External

Market Surveillance Authority – *BSIF*

To be confirmed at the time of product recall by the Operations Manager and Sales Teams:

- Suppliers
- Direct Customers
- Distributors



Recall Documents and Communications Guidelines

Appendix 6

We recognise our obligations to due diligence, it is our intention to be at the leading edge of product conformity, doing more than every other safety footwear manufacturer.

As such, we have prepared this document for use in the event of a Product Safety Incident, on the following pages you will find recall document examples as well as general communication guidelines and minimum standards.

Contents

Product Recall notice template

Website overview and FAQ minimum standards

Electronic mail Template

Social Media Posting Template

Account Manager telephone call to affected distributors guidelines

IMPORTANT SAFETY WARNING

PRODUCT RECALL



ProMan PM9401A Kansas

This product is sold through safety distributors.

Brand: ProMan

The affected batch numbers are: PO245

This product has been manufactured with a toecap which is 2 sizes smaller than it should be and should not be worn.

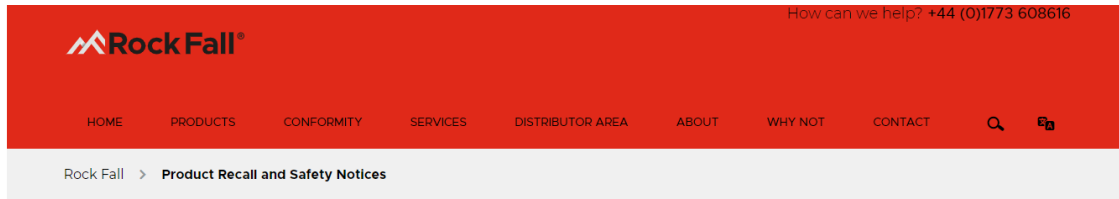
- Stop using the item immediately
- Remove any of the above batch numbers from sale or issue
 - Contact Rock Fall directly

Website: rockfall.com/recall Telephone: 01773 608616 Email: sales@rockfall.com

The Rock Fall senior management team extend our humble apologies that it has been necessary to recall this product and for any inconvenience caused

Website overview and FAQ minimum standards

rockfall.com/recall



Product Recall and Safety Notices

We recognise our obligations to due diligence, it is our intention to be at the leading edge of product conformity, doing more than every other safety footwear manufacturer.

As such, we have prepared this section of our website to house information relating to product recalls and other safety notices.

It includes a history of our safety notices and recalls.

As well as a publicly available document for use in the event of a Product Safety Incident, on the following pages you will find recall document examples as well as general communication guidelines and minimum standards.

We make these available to give our Authorised Distribution Partners and their end-users complete confidence in our Industry Defining Range of Safety Footwear.



Rock Fall Product Safety Incident Plan

Click here to download our product safety incident plan document templates and communications guidelines

READ MORE

Product Recall FAQ Example

Click here to see an **example** of an FAQ

READ MORE



**PO XYZ
EXAMPLE**

A new page should be created for each Product Recall FAQ, this acts as the homepage for all communications relating to the Product Recall.

FAQ questions should be:

- 1) Detailed, specific and relevant to the Recall notice
- 2) Give further information relating to the fault
- 3) Reinforce the corrective actions taken and provide certainty
- 4) Provide further contact information where necessary

Website: rockfall.com/recall Telephone: 01773 608616 Email: sales@rockfall.com

Electronic Mail Template

rockfall.com/recall

[View this email in your browser](#)



IMPORTANT SAFETY WARNING

PRODUCT RECALL NOTICE



ProMan PM9401A Kansas

This product is sold through safety distributors.

Brand: ProMan

The affected batch numbers are: PO245

This product has been manufactured with a toecap which is 2 sizes smaller than it should be and should not be worn.



**PO XYZ
EXAMPLE**

[Full Information and FAQ](#)

The Rock Fall senior management team extend our humble apologies that it has been necessary to recall this product and for any inconvenience caused

Social Media Posting Template

rockfall.com/recall

A detailed, specific social post should be placed on the LinkedIn Company Page and Facebook Company Page, it should also be shared by customer facing staff on their own LinkedIn Profiles.

The image should be accompanied with the following:

“IMPORTANT SAFETY WARNING

All PM9401A Kansas that was manufactured under batch number PO245 has been placed under a general product recall.

This product has been manufactured with a toecap which is 2 sizes smaller than it should be and should not be worn.

For more information, please visit rockfall.com/recall, you will find a specific FAQ page for this case.

The Rock Fall senior management team extend our humble apologies that it has been necessary to recall this product and for any inconvenience caused.”

IMPORTANT SAFETY WARNING



This product has been manufactured with a toecap which is 2 sizes smaller than it should be and should not be worn.



**PO XYZ
EXAMPLE**

ProMan PM9401A Kansas

Account Manager telephone call process to affected distributors guidelines

Account managers will call all distributors that have ordered the affected batch within 48 hours after the product recall decision.

The process for this is as follows:

