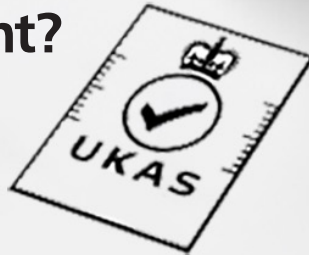


# Why are UKAS approved third-party certification schemes important?



Throughout the course of our work with door manufacturers, we often provide help and support with fire testing. One of the areas that can often cause some bafflement is UKAS-accredited third-party certification (TPC) schemes. TPC schemes are not a legal requirement, but they are recommended in Building Regulations and by the Government. We thought it might be helpful to look at these schemes in more detail and outline their benefits.

## What is UKAS?

UKAS is the National Accreditation Body for the United Kingdom. It is appointed by Government to assess and accredit organisations that provide services such as certification, testing and inspection. In short, UKAS 'checks the checkers'.



## What does accreditation mean?

When an organisation receives UKAS accreditation to operate a certification scheme, it essentially represents formal, third party/independent recognition that the organisation is competent to run a certification scheme. Some of the TPC schemes we have come across in the course of our work are:

- BlueSky
- BRE
- BSI
- BuildCheck
- Certifire (WarringtonFire)
- IFCC (IFC Certification Ltd)
- Q-Mark (BM Trada)

## What is third-party certification (TPC)?

TPC is formal, independent recognition that a prescribed standard of performance has been achieved. The third party is the certifying body. In the fire door industry, there are several different certifying bodies that run certification schemes for products and services. Those bodies have been assessed by UKAS to check that they are competent to run those schemes.

Each body/scheme has a scope which lays out what their standards are. The schemes always go above and beyond the basic legal requirements – this is the whole point of TPC: it's a belt-and-braces approach that provides additional assurances of consistent quality.

It is worth noting that Rutland recently conducted a study of European fire door certification and found that third-party certification is not widely recognised in Europe. In fact, some UK TPC schemes are based on the BS 476-22 testing standard which has never been a recognised standard in Europe.

“It's a belt-and-braces approach that provides additional assurances of consistent quality.”





## What is the difference between accreditation and TPC?

It's important to note that 'Test Reports' and 'Field of Application Reports' written by UKAS accredited bodies or labs are not TPC. For example, a UKAS-accredited laboratory may run a test on a product and issue a test report – this gives a one-off result at a UKAS-accredited laboratory only – it is not third party certified yet.

TPC is a process rather than a one-off test. As well as primary testing, TPC schemes will often include:

- Examining test evidence – a committee will often look closely at results
- Annual and ongoing product testing of randomly selected products
- Observation of manufacture and assembly (of door sets for example)
- Audits of documentation, training, complaints procedures
- Random checking of any of the above

## Does a certification body have to be accredited?

You do not have to be UKAS-accredited to run a certification scheme, but it is UK Government policy to recommend using an UKAS-accredited body wherever possible when seeking certification.

TPC schemes also apply to services as well as products. Fire door installers who are part of a TPC scheme will be inspected on site 2-3 times a year, depending on the scope of the scheme they are participating in. The scheme will look at levels of training and competence as well as record keeping of installations, purchasing and other operating procedures.

Each TPC body must remain rigidly impartial in the operation of its scheme. Many will have a committee which examines recommendations and has the power of veto. TPC bodies are allowed to explain the scope of their rules but they are not allowed to give advice or explain what a participating company needs to do in order to comply. This prevents the TPC body inadvertently giving away processes or procedures that they might have seen carried out at other participants' premises.

## Is UKCA/CE marking third party certification?

Component parts under a harmonised or designated standard will often also carry a CE/UKCA marking. From November 2019 external fire doorsets, where there is a harmonised or designated standard, have carried the CE/UKCA mark. These 'external fire doorsets' are sometimes used internally as apartment entrance doors where they are not separating the external climate from the internal - in this situation the same product will sometimes also have a TPC sticker because CE/UKCA marking cannot be used on

internal fire doorsets due to there being no harmonised or designated standard for internal doorsets. This can give rise to confusion – what's the difference?

CE/UKCA marking is a minimum mandatory requirement under Construction Products Regulation (CPR). The UKCA (UK Conformity Assessed) marking came into effect on 1 January 2021 and in January 2023 will replace the CE (European Commission) marking within the UK.

One of the main differences is that CE/UKCA marking is a mandatory requirement when there's a harmonised or designated standard, whereas TPC schemes are undertaken by companies on a voluntary basis because they want to go above and beyond the minimum legal standards of compliance.

Another big difference between CE/UKCA certificates/primary fire test reports and TPC is CE/UKCA certificates, primary test reports and field of application reports are not placed in the public domain or published by the notified or conformity assessment body - CE/UKCA certificates and test reports are held by the door manufacturer and, if they wish, self-declared by the manufacturer. Whereas TPC certificates are placed in the public domain by the UKAS accredited certification body and anyone can access this information online.

TPC bodies have control to withdraw or suspend certification if they find non-conformance or lack of audit testing and other non-compliance with their scheme requirement and this will be seen in the public domain. This is powerful. TPC is impartial and a completely independent voice saying, 'this product is safe to use'. CE/UKCA does not have this dynamic level of control around non-conformance and value engineering (cutting costs) could occur unchecked in the manufacture and installation of fire doors where there is no external auditing.



## Three key benefits of TPC

Being part of a TPC scheme is an involved and ongoing process and requires a not insignificant investment of time – for example, it can stop a production line as something is pulled off for testing. Participants do need to set aside a number of days per year to accommodate the scope of the scheme. However, at Rutland we think this investment of time is worthwhile. For us, the benefits of TPC are threefold:



1

Most importantly, **it's about doing things right**, and when it comes to fire and life safety, there's no other way to do it. Anything less may cost lives. **It's more than compliance**; it's doing your level best to make sure your product will always perform as required.



2

Adhering to a TPC scheme ensures that the most **rigorous standards are upheld** on a consistent basis. **It requires good discipline** to follow such a framework, and at Rutland we are a better-run organisation because of it.



3

From a sales point of view, having TPC on your product is **a mark of quality**, which will differentiate it from those that have merely met the minimum standard.

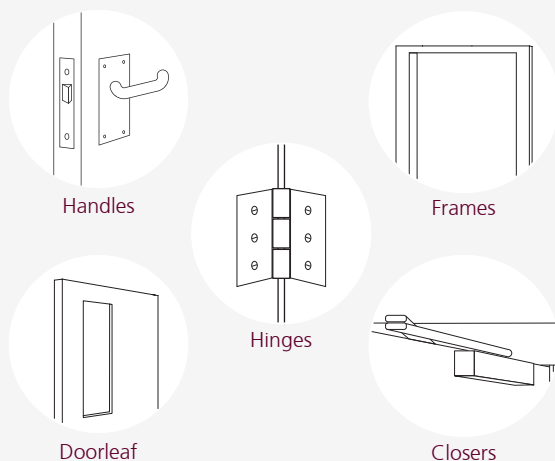
## Third party certification schemes for fire doors

Broadly speaking, there are two different ways of third-party certifying a fire door:

### **A** Door assembly route

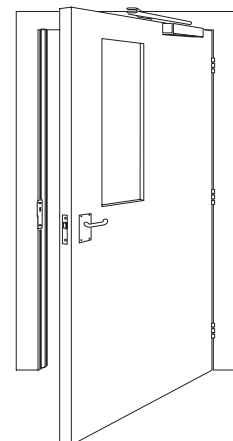
The first and still commonly used route of third party certifying a door is ensuring that each individual component of the final doorset is third party certified. It can be time-consuming gathering these documents, but it must be done if the intention is for the entire door assembly to be third party certified. Door assemblies don't tend to be used as external fire doorsets since CE/UKCA became mandatory and requires a doorset to be supplied under the responsibility of a single supplier.

The TPC on the doorleaf will generally dictate the specification of the other component parts on the doorset. Those component parts can theoretically be part of a different TPC scheme, as long as they meet the requirements set out by the third-party certifier of the doorleaf. However, be aware that some TPC schemes do insist on certain component parts being part of the same TPC scheme, so it pays to check this out well in advance.



### **B** Doorset route

This is the second route to TPC or CE/UKCA marking where the door manufacturer gathers all the different certified components, assembles the doorset at the factory, and fire tests the complete doorset. The doorset leaves the factory as a life-saving device.



The doorset tends to have one certificate with a number of scope documents known as 'Field of Application' backing that certificate. For those then taking it to market or installing it, there is one identification mark that says this is a TPC doorset and every component on it is contained within that one document.

As well as carrying the identification (labels/plugs) required by the certification body, there may be another label which has a QR code or tracking pin so that it is easier to trace back to the installer and manufacturer and see more detail. It's a good system and less confusing than each component having different documentation. We believe there is less room for error using this system, particularly when it comes to maintenance further down the line. Even if future legislation doesn't go as far as making this approach mandatory, it's likely that stipulations from insurance companies will – increasingly they are already insisting on this approach.

## Definitions

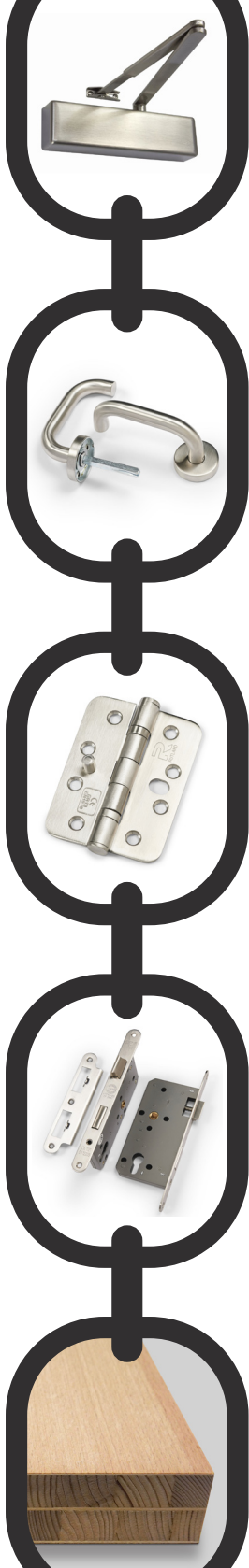
**Door assembly** - frame, door leaf or leaves and their necessary hardware supplied as individual component parts, usually un-machined, and placed on the market by more than one legal entity.

**Doorset manufacturer** - a manufacturer of a complete doorset that has generated their own ITT and places the product on the market.

**Doorset assembler** - a manufacturer of a complete doorset that uses cascaded manufacturing information, ITT, DIAPs, EXAPs and Classification Reports from a Systems House in order to place a product on the market.

**Doorset** – complete, fully machined, no further site work required, supplied from one legal entity, fire and/or smoke capability, under the responsibility of a single supplier.

- Door leaf
- Door frame/architrave
- Side screen / fan light
- Intumescent Seals
- Smoke seals
- Hardware
- Door closer
- Glass and glazing system
- Thresholds



## Don't break the chain

An important point to note is, whatever route has been used to assemble a doorset, if a specifier/building owner/door manufacturer has gone to the effort and expense of ensuring a doorset is third party certified (and having the additional assurance that TPC provides), any subsequent changes, however small, must not break that certification chain. For example, replacing a damaged hinge with a substitute that is not third party certified would mean the entire doorset would lose its certification. For this reason, it is recommended that specifications are as clear and unambiguous as possible, in order to achieve and maintain the assurances that third party certification provides.

## How will new legislation influence third-party certification?

The Building Safety Bill has now reached committee stage in the House of Lords and is expected to get Royal Assent in May 2022. The Bill is likely to focus on ensuring that the specification and certification of life saving devices such as fire doors is nailed down at design level, moving the emphasis and responsibility to much earlier in the process rather than at a post-build inspection level. At Rutland we believe the direction of travel will be to quite rightly rely increasingly on the rigour of TPC schemes to provide additional assurances that life safety is uppermost in any construction project. View our webinar [Third Party Certification Explained](#).

### Discuss your specific requirements with Rutland

Rutland provides specialist support with preparation for smoke, fire and security testing of doorsets and door assemblies. Please make contact if you would like to hear more about our support.

Call 01246 261491 or email [sales@rutland.co.uk](mailto:sales@rutland.co.uk) to start a conversation.

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