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## CODE GUIDANCE

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### FOREWORD

*Manufacturers of Construction Products who choose to sign up to the “Code for Construction Product Information”, are agreeing to abide by the clauses in this code to give confidence to those in the supply chain using their **Product Information**, that it is clear, accurate, up-to-date, accessible, and unambiguous. The **Product Information** can therefore be relied upon when making decisions about using those **Construction Products** at any stage of design, specification, installation, use, maintenance and disposal.*

## Definitions

### Construction Product

A **Construction Product** is defined as “a product, substance or collection thereof, that has been manufactured, refined or processed and declared by its **Manufacturer** for an intended end use for temporary and/or permanent inclusion in a building or civil engineering works, whether as part of new construction, refurbishment or maintenance.”

Note: examples of ‘collection thereof’ include for example a system or kit, and all included bought-in and supplied product.

### Product Information

**Product information** is defined as “any information about a **Construction Product** made available to internal and/or external stakeholders. This includes but is not limited to, **Product Information** given in writing, in print, online, electronically or in an advertisement”.

### Manufacturer

**Manufacturer** is defined as “any natural or legal person who manufactures a **Construction Product**, or has a **Construction Product** designed or manufactured and places it on the market under their own name or trademark”.

Further, the responsibility of the **Manufacturer** is placed on any person who changes the intended use of a **Construction Product** in such a way that different essential or other legal requirements will become applicable, or substantially modifies or re-builds a **Construction Product** (thus creating a new **Construction Product**), with a view to placing it on the market or for putting it into service.”

## Accessing Product Information

For stakeholders of **Construction Products** to make informed decisions as to the design, specification, installation, use, maintenance and disposal of **Construction Products** it is important that they have access to the appropriate **Product Information**. The Code requires all **Manufacturers** of **Construction Products** to have a webpage within the **Manufacturer’s** control, where **Product Information** can be accessed. If any personal data is sought to access such **Product Information** as detailed in clauses 4, 5, 6, 8 & 9, then the **Manufacturer** must process such personal data in accordance with all applicable data protection and privacy legislation in force from time to time in the UK (UK GDPR).

# Information Creation Clauses 1 - 3

Good **Product Information** must be thought through right from the start. There needs to be clear ownership, process, and structure for how **Product Information** is created and managed throughout its life, with consideration to ongoing responsibility when in the hands of third parties. The importance of proper review by competent people, whether internal or external to the organisation, cannot be underestimated.

## Clause One

A **Manufacturer** must have in place a documented sign-off process for creating **Product Information**.

### Minimum requirements

- A named individual(s)/role(s) must be nominated to be responsible for the creation of the '**Product Information**' at its instigation
- The final **Product Information** must be signed off by an appropriately competent person
- There must be an audit trail: keep records of processes undertaken, documentation reviewed, including input from internal and external third parties
- Must have, and be able to demonstrate, a process for issuing the **Product Information** to all appropriate internal and external channels

### Considerations

- Ensure all appropriate internal and external stakeholders have input
- Consider how to demonstrate "looping back" if later comments change the original version
- Consider how you demonstrate sign-off by departments or individuals, where appropriate, prior to final sign-off
- Although it may not be possible in all circumstances, where appropriate, consider adopting digital tools for greater traceability, improved efficiency and record keeping
- Consider a scheduled review of '**Product Information**' wherever it may be held

## Clause One Guidance

It is important to highlight that clause one requires named individual(s) within the **Manufacturer** to be the named responsible person and named competent sign off person when creating the **Product Information**, irrespective of third-party marketing agencies or consultants hired to help create the literature. Where a **Manufacturer** is using third party content within their **Product Information**, ensure to keep records of or reference the source.

The CCPI recognises that there are many ways of providing **Product Information**. Whilst clause one is asking **Manufacturers** to provide evidence of an overarching **Product Information** creation process, there will be specific processes **Manufacturers** will already be following for certain product documentation. Where this is applicable, please provide that detail during audit.

# Clause Two

A **Manufacturer** must have in place a formal version control process for all **Product Information**.

## Minimum requirements

- Where appropriate **Product Information** must show unique identifiers with;
  - » Version identifier
  - » Date of issue
- Have a documented process that sets out your rules for assigning identifiers
- Be clear about how stakeholders can check that '**Product Information**' is the latest version
- Be clear about how stakeholders can access pre-existing **Product Information** relating to previously sold/ discontinued '**Construction Products**'
- Must have, and be able to demonstrate, a process for updating all appropriate internal and external channels within a reasonable deadline pre-set by the **Manufacturer**

## Considerations

- Using unique identifier to also highlight type of **Product Information**
- Ability to confirm this **Product Information** is correct version - e.g., QR code, digital object identifier(s) or similar, to direct to correct information
- Separating process for major (revision) vs minor (version) changes, considering whether the changes affect the meaning, function or intended use; - e.g. revision (1.0 to 2.0) vs version (1.0 to 1.1)

## Clause Two Guidance

For **Product Information** that does not have pre-existing version control requirements, the **Manufacturer** must implement their own version control process. For those **Manufacturers** looking for any guidance on how to label and set metadata, such as identifiers, to **Product Information**, please view ISO 7200.

As with any good version control process there must be timely communication to the channels that relay **Product Information**. We are requiring all **Manufacturers** to be able to update their (contracted) third-party channels within a reasonable timeframe of issuing their new or updated **Product Information**, to ensure access to clear, accurate and up to date **Product Information**.

# Clause Three

A **Manufacturer** must not use misleading or ambiguous wording, phrasing or imagery and must embrace the use of plain English to ensure accurate representation of **Product Information** and performance claims.

## Minimum requirements

- Do not use words or phrases that exaggerate and/or do not accurately represent, a **Construction Product's** performance or capability
- Only use industry terminology and abbreviations, including acronyms, where the competent intended user of the **Product Information** would be expected to understand them
- Do not use imagery that could mislead the user into inaccurate application, representation and/or performance of the **Construction Product**
- Only use product images (real or rendered) that accurately reflect the **Construction Product** being sold. If one **Construction Product** image is used to represent a range, provide a statement of clarity near said image for the user
- Evidence a reference guide for ambiguous words/phrases and the use of correct imagery that can be used in the creation of **Product Information** – this may include referring to relevant Trade Association guidance
- If in any doubt as to which words, phrases or imagery would be appropriate or acceptable, please refer to the appropriate Trade Association or Industry Body for clarity

## Clause Three Guidance

The CCPI aims to operate in the spirit of the Advertising Standards Authority's (ASA) CAP Code where marketing communications is legal, decent, honest, and truthful so that consumer confidence is maintained. Clause three highlights where **Manufacturers** need to pay attention to not mislead consumers.

The full text of the CAP Code is available [here](#).

Consideration could be given to the FLESCH Reading-ease Test and FLESCH Kincaid Test. A tool to help ensure product information is clear and easy to read. The tests are designed to indicate how easy a passage of text, in English, is to read.

## Additional Guidance: Reproduction of Product Information by third parties

Where a **Manufacturer** has direct control over their **Product Information** (for example through a subscription service, or other formal agreement) reproduced on a third-party platform or webpage the **Manufacturer** remains responsible for the **Product Information** and it is their responsibility to ensure that the **Product Information** is reproduced correctly and in accordance with the Code for Construction Product Information.

Where a **Manufacturer** allows their **Product Information** to be reproduced, for example by a merchant, the **Manufacturer** must ensure that they provide updated **Product Information** in a timely manner, however the Merchant remains responsible for ensuring that they update published **Product Information** appropriately.

Where a **Manufacturer** is aware of misleading and/or unauthorised **Product Information** in circulation regarding its **Construction Products**, the **Manufacturer** will make reasonable efforts to remove and/or correct the information.

# Core Information Clauses 4 - 7

*It is imperative that performance and characteristic **Product Information** is clear, up to date and accessible so that it can be relied upon, by competent users, when making product comparisons and selections for their projects and/or intended applications. These clauses draw out the essential **Product Information** required when making such decisions. However, the importance of proper review by competent people, from both supplier and user cannot be underestimated.*

## Clause Four

*A **Manufacturer** must provide valid and demonstrable documentation where claiming compliance to, or achievement of, any Certification, Classification, or Industry Standard.*

### Certification

Offers a high level of scrutiny. Certification is carried out by an independent third-party organisation accredited to ISO 17065 by a National Accreditation Body (such as UKAS). Certification should be carried out in accordance with the schedule of accreditation, which will be published on the Accreditation Body webpage. Certification tasks can include European Technical Assessments and CE marking where appropriate.

**Details of your certification, i.e., a certificate, must be publicly available on your webpage, and/or the certificate number and provider must be stated for a third party to check.**

### Classification

Confirmation of a level of performance based on defined applications as set out in the Classification Report and is based on one or more prescribed tests as identified in a formally published classification standard.

Classification standards are a commonly used part of the European **Construction Products Regulation (CPR)**.

European Classification standards are published by BSI and CEN in response to a European Commission Delegated Act.

**Classification reports are intended to be published in full to get the full context of the classification. Therefore, you must make available, in full, on request and/or where appropriate on your webpage.**

### Industry approved or recognised standard

A formally agreed and publicly available method of determining a level of achievement and/or performance.

This method must be capable of being reproduced by different testing bodies and therefore provides a reliable basis from which comparisons can be made. This allows people to determine a performance requirement without specifying a particular product.

**Test reports are intended to be published in full to get the full context of the test conducted. Therefore you must make them available, in full, on request and/or where appropriate on your webpage.**

# Clause Five

A **Manufacturer** must provide specific documentation when making any product performance claims which are outside of Certification, Classification or Industry Standard tests;

- All stated performance data must be referenced back to a valid dated test or specified technical assessment
- Where a test is referenced, it must state the **Construction Product** tested, the test, date passed, under what standard, where tested and by whom and the last date its validity was reviewed
- Stated performance data must be clear as to whether it is based on calculated and/or tested performance and **manufacturers** must clearly state where tests are laboratory tests;
- Specific properties relevant to intended application must be clear e.g., structural/fire/acoustic/thermal
- Be specific to the intended application and where known, provide examples of limitations or inappropriate applications.

## Minimum requirements

- **Construction Product** performance claims as detailed above must be made available on request, and shared in an appropriate timeframe.\* Or, where appropriate, on your webpage.

\* Where the documentation can be made publicly available, it is expected that manufacturers should respond to the request within 28 days.

## Clause Four and Five Guidance

In clause four, where a Certification, Classification and/or Test report does not cover the demonstrable documentation listed out in clause five, you must provide this additional documentation in context with the performance claimed.

Clauses four and five require that evidence is provided to fully support claims made, so that competent users have sufficient, current, and accurate information to make informed decisions. The sole objective is that any claim made about a **Construction Product** must be substantiated by appropriate, clear, and unambiguous evidence. We do not believe this requirement exceeds the Code of Advertising Practice or the expectations of a competent user. There is no requirement to disclose intellectual property and we recognise that test reports, whether tested against industry harmonised standards or not, can contain confidential information and intellectual property. In this scenario, if not appropriate to publicly share the information, we recommend working under an NDA with appropriate competent users, and/or working with an accredited third-party assessment organisation to obtain technical assessments that evidence any of the claims made.

R&D testing and test reports fall out of the scope of clause 4 and 5. Evidence is only required to fully support final performance claims made on a '**Construction Product**' by the **Manufacturer**.

Where suppliers private label **Construction Products** they are responsible as the **Manufacturer** of said **Construction Product** and are therefore required to provide the evidence for performance claims. Should a Manufacturer not wish to disclose where their product is sourced from, then they should seek to obtain their own branded certifications, classifications, and test reports so that they can provide the evidence required.

Note, we do appreciate that not every part of the industry has access to all options mentioned in Clause 4 i.e., Certification, Classification or Industry approved or recognised standard. We would support such sectors seeking an increase in the offering available to them but this is outside the scope of the CCPI and is likely to be led by sector-specific trade associations.

## Additional Guidance

Certificate and certification are different and should not be confused. A certificate is a way to record the product/output from a certification, classification, or results of a test to a recognised approved standard. Care should be exercised to verify the validity and scope of the certificate, if in doubt contact the issuing body.

Classification is not the same as a product class. A product class may be referred to as a “Type” and is a group or range of **Construction Products** that have a set of defined minimum characteristics and/or performances. There must be clarity as to whether the information being presented is a characteristic rather than a determined performance.

Test reports should not be summarised, other than where allowed through a classification standard. When presenting as evidence all certification, classification and testing should be presented in full or as set out in the relevant standard.

## Clause Six

A **Manufacturer** must make available on their webpage the descriptive and physical characteristics of the **Construction Product**, including, where applicable and not limited to;

- Manufacturer and Product Name
- Product Type
- Code/Model/Reference/SKU
- Description
- Application/Use
- Material
- Weight
- Finish /Colour
- Packaging
- Pack size
- Unit of measure
- Chemical properties/Safety data sheets
- Size/dimensions (product & installation spatial requirement)
- Shelf life

## Clause Four, Five and Six Guidance

When organising and communicating **Product Information**, there are multiple tools available. Consider communicating **Product Information**, where appropriate, through formats such as;

- Declaration of Performance (DoP),
- Environmental Product Declaration (EPD),
- Product Data Sheet (PDS) from a recognised Product Data Template (PDT), and
- Library objects using recognised standards, structures, and classification systems where appropriate.

# Clause Seven

A **Manufacturer** must have a documented process ensuring all changes affecting **Product Information** resulting from changes to the **Construction Product** are identified and reflected in revised **Product Information**.

## Minimum requirements

- The **Manufacturer** must demonstrate an internal process for reviewing the accuracy of the **Product Information** against the manufactured or bought-in product, and that there is a process for Manufacturing or Operations to advise those departments handling **Product Information** of changes brought about by a manufacturing or component change
- If a change is made which would have an impact on the declared **Product Information**, then loop back to clauses #1 and #2 accordingly

## Considerations

- If using third party assessments of quality management systems e.g., ISO 9001 ensure that it is accredited by a National Accreditation Body and that the appropriate control systems are in place
- In addition, include internal communication to those departments handling **Product Information**

# Associated Information Clauses 8 - 9

**Product Information** must take account of the entirety of the product's life cycle and specifically beyond design and supply. These next two clauses deal with the **Product Information** pertinent to handling, installation, operation, maintenance, and disposal aspects of the **Construction Product** together with transparent disclosure of warranty and guarantee information.

## Clause Eight

A **Manufacturer** must publish and make easily accessible, on their webpage clear **Product Information**, where applicable, on handling, installation, operation, maintenance, and disposal of **Construction Products**.

### Handling

Handling of **Construction Products** is the movement of **Construction Products** from the **Manufacturer** to point of installation and includes any intermediary storage in between the two points.

#### Minimum requirements

- Safe manual and mechanical handling
- Safe storage and transport to site to ensure the declared performance has not been compromised

### Installation

Installation of a **Construction Product** is the incorporation of the **Construction Product** into the construction works for temporary or permanent use.

#### Minimum requirements

- Safe installation and access
- Interface with other products
- Installation guidance to achieve tested performance
- Legal requirements
- Specialist equipment and tools
- Specific competence level required for installation
- Implications for maintaining warranties, guarantees and insurance
- Inspection, testing, commissioning, and record keeping requirements
- Sequencing of works

### Operation

Operation of a **Construction Product** is where the completed installation has been commissioned and handed over for use.

#### Minimum requirements

- Clear operating instructions
- Safety guidance
- Competence levels required in operation
- Maintenance requirements and schedule
- Legal requirements
- Limitations of use

## Maintenance

Maintenance of a **Construction Product** is the regular inspection and required interventions to maintain the performance of the **Construction Product** in use.

### Minimum requirements

- Implications for maintaining warranties, guarantees and insurance
- Safe access
- Competence levels required to carry out inspection and maintenance
- Schedule of inspection and maintenance
- Replacement parts
- Legal requirements
- Specialist equipment and tools
- Cleaning requirements
- Record keeping requirements

## Disposal

The disposal of a **Construction Product** is the removal from the site of waste which has occurred due to pre-installation damage, offcuts/damage during installation, post installation damage and end of life disposal.

### Minimum requirements

- End of life information
- Recycling options (including reuse)
- Safe disposal
- Legal requirements
- Environmental hazards

## Considerations

- **Product Information** must be appropriate to audience type
- **Product Information** must be clear and instructional
- Further access to customer technical support
- Provide appropriate access to '**Product Information**' for example, via webpage, QR codes etc

# Clause Nine

*When making any claims of guarantees and/or warranties, the **Manufacturer's** webpage must state what is covered, excluded, and required to comply with its terms. The guarantee/warranty should be transparent, and in a format recognised by the relevant sector of industry.*

## 'Construction Product' Guarantee/Warranty offered by a 'Manufacturer'

A legally binding promise (called either a guarantee or warranty) which is a **Manufacturer's** offer of a specific remedy or a range of remedies to a named recipient and/or may refer to a building (or part of it). Depending on the terms, this could apply if the **Construction Product** does not meet its specification and/or is defective. It aims to provide assurance that the **Construction Product** can perform to the requirements of its intended use subject to correct installation, use and maintenance.

## Minimum requirements

### WHAT IS COVERED?

- Who is offering the guarantee/warranty and how is it underwritten?
- What does the guarantee/warranty cover e.g., **Construction Products**, Installation, Design?
- Who benefits from the guarantee/warranty?
- Length of guarantee/warranty
- What is the principal function(s) and/or performance(s) of the **Construction Product** being guaranteed/warranted?
- What is the value and/or nature of the cover?
- Does the level of cover diminish over time? If so, how?
- Is the guarantee transferable to another building owner, is there a limit to the amount of times you can do this, or a cost attached?

### WHAT IS EXCLUDED?

- What does the guarantee/warranty not cover e.g., **Construction Products** supplied by others, Installation, Design?
- What function(s) and/or performance(s) is expressly excluded from the **Construction Product** being guaranteed/warranted?

### WHAT IS REQUIRED TO COMPLY WITH THE TERMS?

- A clear statement detailing any conditions on who and how the **Construction Product/system** was specified (e.g. has the **Manufacturer** been involved in the specification if it is required under the guarantee)
- A clear statement of the requirements (e.g. maintenance, attendance at inspections, repairs in conjunction with the terms of the guarantee) to maintain continuity to the guarantee/warranty
- What could invalidate the guarantee? e.g. withheld payment of monies related to the project, change of use of the building or modifications to the area without consultation with the guarantee provider

All the above elements are subject to the detailed terms and conditions of the relevant guarantee/warranty which should be made available on request.

## Clause Nine Guidance

**Construction Product** guarantee/warranty offered by a **Manufacturer** is not be confused with the following;

**Durability statement** - The period for which the **Construction Product** will deliver its intended performance in line with appropriate product standards, and assumes that appropriate maintenance has been carried out

**Service Life Statement** - this describes the potential lifespan of the **Construction Product** e.g., when it becomes more economical to replace rather than repair, and/or is no longer fit for purpose

Durability and Service life statements are not legally binding, would not have terms and are merely, statements.

**Insurance Backed Guarantees/Warranties** - (IBG) a project specific insurance policy issued by an insurer for a fixed period. An IBG should not be confused with the annual insurances held by a **Manufacturer** that may underpin their own risk; insurance such as Product Liability and Professional Indemnity Insurance are not IBG. It is therefore important to understand the point under 'what is covered' to be clear who is offering the guarantee and what the mechanism is that they are using to offer the guarantee.

# Support and Competence Clauses 10 - 11

A **Manufacturer** must take responsibility to ensure their people are competent for the role being undertaken, and that access to advice is straightforward. Particular attention should be paid to where a team member is and is not competent to provide **Product Information** so that they are aware of their limitations.

## Clause Ten

A **Manufacturer** must ensure technical helpline contact details (telephone and/or email) are visible and accessible on their webpage.

### Minimum requirements

- Apply appropriate signposting to contact information, e.g., 'Three-click rule', to ensure that users seeking **Product Information** assistance are not put off by the effort required to access it.

### Considerations

- Consider where to place contact information e.g., product page, homepage etc.
- Consider what type of contact offered will deliver access to an appropriate competent person in a timely manner

## Clause Eleven

A **Manufacturer** must have in place a robust training programme (for new and existing personnel) to ensure that anyone conveying **Product Information** is competent to the level of knowledge required for their role.

### Minimum requirements

- **Manufacturers** must define a knowledge and competence matrix for all roles that are involved with **Product Information**, including all customer-facing roles
- Show evidence of a maintained training and qualifications register
- Demonstrate understanding from all personnel of where, due to competency, they cannot provide **Product Information**

### Considerations

- How you test competence following training given
- How you assess new starters' competence levels
- Consider how you extend this out to your distribution network, who are responsible for communicating your **Product Information**
- Consider circulating the CCPI throughout the business for awareness so that everyone understands the impact of their actions on **Product Information**
- Consider using a SKEB (skills, knowledge, experience, behaviour) matrix to establish competence requirements.

## Glossary

**For the purposes of this code the following terms and their respective definitions apply:**

**Accreditation body (AB)** - Provides an independent accreditation service to determine the capability of parties to carry out matters such as testing, calibration, certification, and inspection in accordance with agreed standards. E.g., the United Kingdom Accreditation Service (UKAS) is the National accreditation body for the UK.

**Webpage** – Digital multi-media delivered via the internet.

**Competent/Competence** – application of skill, knowledge, experience, and behaviour consistently to achieve a specific outcome

**Declaration of Performance (DoP)** - Provides information on the performance of a **Construction Product** in a structured format. The DoP is a key part of the UK **Construction Products** Regulation and Conformity Assessments.

**Environmental Product Declaration (EPD)** – A declaration that “quantifies environmental information on the life cycle of a product to enable comparisons between products fulfilling the same function.”

**Product Data Templates (PDT)** - A structured collection of properties that describe a specific product or product type.

**Product Data Sheets (PDS)** - A populated PDT.

**QR Code** – ‘Quick Response’ Code, type of machine-readable optical label that contains links to attached item information.

**Technical Assessment** – Assessments carried out on test evidence whether produced using Extended Fields of Application (EXAP), or written around rules contained within published test standards.