



Code for Construction Product Information

MERCHANT AND DISTRIBUTOR VERSION

FOREWORD

*Merchants and Distributors of Construction Products who commit to sign up to the “Code for Construction **Product Information**”, are agreeing to abide by the clauses in this code to help give confidence to those in the supply chain using the **Construction Product Information** supplied, that it is Clear, Accurate, Up-to-Date, Accessible, and Unambiguous. In adopting the principles of the Code, **Merchants and Distributors** are supporting the construction industry’s need for greater accuracy and clarity in terms of the **Product Information** being supplied upon which installation decisions are based.*



Please note:

This Code for Construction **Product Information - Distributor Version** should be read in conjunction with the code for Construction **Product Information - Manufacturer Version** to understand the full extent of the code.

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 **Merchants and Distributors** of **Construction Products** to have a webpage within their control, where **Product Information** can be accessed. If any personal data is sought to access such **Product Information** as detailed in clauses [to be inserted], then the **Merchant or Distributor** 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).

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’ could include a system or kit.

Merchant

A **Merchant** is defined as “any natural or legal person that takes a **Construction Product** from a **Manufacturer**, and places it on the market in its original form, i.e., without modification or change to brand, trademark or name”. The term **Merchant**, used in this definition and throughout the document, can be interchanged with distributor, wholesaler, or retailer.

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.”

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.

Information Creation Clauses 1- 3

Merchants reproducing a Manufacturer's **Product Information** have the responsibility to ensure that the information is up-to-date and accurate and is not reproduced in a way that would affect its interpretation.

Clause One

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

Clause one applies where a **Merchant** extracts original **Manufacturer Product Information** and reproduces it into new **Product Information**. Should a **Merchant** not do this and instead pass on **Product Information** in its original form (with the exclusion of elements covered in clause 3) from the **Manufacturer**, then clause one does not apply.

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
- Must be able to demonstrate that there is a process to ensure that any **Product Information** created is using up-to-date **Manufacturer's Product Information** at the time of creation
- There must be an audit trail: keep records of processes undertaken, documentation reviewed, including input from internal and external third parties, including noting dates of Manufacturers' documents used
- 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 demonstrate, a process for issuing the **Product Information** to all appropriate internal and external channels

Guidance for Clause One:

Product Information as stated in the definition above is any information given in writing, in print, online, electronically or in an advertisement. Therefore, examples of creating new Product Information may include extracting original **Product Information** and condensing/editing into content for ecommerce platforms, catalogues, technical documentation, and advertisements.

It is important to highlight that Clause One requires named individual(s) within the Merchant to be the named responsible person and named competent sign off person when creating the **Product Information**. Where a Merchant is using third party content within their **Product Information**, ensure to keep records of or reference the source. Where Merchants are using third-party marketing agencies or consultants to help create **Product Information** the Merchant remains the responsible person for sign off.

Clause Two

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

Clause two details the requirements of a Merchant when maintaining version control of published information.

There are three instances of version control:

A. Where a **Merchant** reproduces a **Manufacturer's Product Information** into their own **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 the latest version of a Manufacturer's **Product Information** being used within Merchant's **Product Information**
- 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 receiving updated information from the Manufacturer, updating the Merchant's **Product Information** that is affected and subsequently updating all appropriate internal and external channels within a reasonable

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
- Separate 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)
- Using statements like '**Product Information** from **Manufacturer X** as at 01/01/2021'

B. Where a **Merchant** reproduces a **Manufacturer's Product Information** in part or in full

Minimum requirements

As above for A). with the additional requirement to be clear about the latest version of a Manufacturer's **Product Information** being used within Merchant's **Product Information** and the terms that have been edited/removed.

C. Where a **Merchant** reproduces a **Manufacturer's Product** original **Product Information** and upon receipt of latest version, replaces the original **Product Information**

- Demonstrate timely access to and publication of latest **Product Information** version, once received from the Manufacturer
- 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 Merchant

Guidance for Clause 2:

In scenario A) a **Merchant** is extracting original **Product Information** and condensing/editing to form their own **Product Information**.

In scenario B) this is augmented by the removal and editing of terms not in conformance with the CCPI Merchants and Merchants Code Clause 3.

In Scenario C) a **Merchant** is providing the **Manufacturer's** original **Product Information** with no condensing or editing.

Clause Three

A **Merchant** 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.

Therefore:

The **Merchant** will reject **Product Information** from **Manufacturers** that is incorrect or does not align with the principles of the CCPI, (for example utilising words and phrases that exaggerate or do not accurately represent a Manufacturer's Construction Product's performance or capability).

The **Merchant** will promote the CCPI and recommend or require that **Manufacturers** seek to align with the CCPI and utilise CCPI verification processes.

The **Merchant** MUST ensure that it is clear where a **Manufacturer's Construction Product** is CCPI registered (by reproducing their CCPI numbered logo) and where a Manufacturer's **Construction Product** is not, so that users of **Product Information** produced by a **Merchant** are clear as to which **Manufacturers'** information and processes have been verified.

The **Merchant** will promote the importance and value of the CCPI and the CCPI verification processes to reflect the company's own commitment to product safety and the eradication of misleading claims, thereby ensuring that your customers and clients can rely on the information provided by the company in relation to construction products.

Minimum requirements

- Have in place a clear company policy to reject **Product Information** from Manufacturers that is incorrect or does not align with the principles of the CCPI, (for example utilising words and phrases that exaggerate or do not accurately represent a Manufacturer's Construction Product's performance or capability)
- Have in place a clear company policy to promote the CCPI and recommend or require that Manufacturers seek to align with the CCPI and utilise CCPI verification processes
- Do not use words or phrases that exaggerate and/or do not accurately represent a Construction Product's performance or capability and reject information from Manufacturers that is incorrect or does not align with the principles of the CCPI. (Please see 'CCPI GUIDE TO WORDS AND PHRASES TO AVOID USING' downloadable from www.cpicode.org.uk)
- 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 CCPI guidance on words and phrases to avoid and also refer to the appropriate Trade Association or Industry Body for clarity
- Clearly inform customers of the company's commitment to the CCPI, (using agreed words and phrases with CCPI) and clearly signpost the importance of the CCPI and its verification processes
- Clearly inform all suppliers of the company's commitment to the CCPI, the importance and benefits of the Code and encourage them to confirm to the CCPI
- Ensure that it is clear where a Manufacturer's Construction Product is CCPI registered (by reproducing their CCPI numbered logo) and where a Manufacturer's Construction Product is not, so that users of **Product Information** produced by a Merchant are clear as to which Manufacturers' information and processes have been verified
- Where Manufacturers are not aligned with the CCPI, consider not using the information provided, recommend or require that Manufacturers seek to align with the CCPI and utilise CCPI verification processes

Considerations

- Consider how to train staff on appropriate terminology when providing advice to ensure the accurate representation and/or performance of the Construction Product
- Train staff in the effective use of short copy writing to seek to ensure that social media posting and online social media advertising does not omit appropriate information, (e.g. inappropriate editing supplier information to fit social media post)

Clause 4

A **Merchant** 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 specific **Product Information** so that they are aware of their limitations.

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

Minimum requirements

- Merchants must define a knowledge and competency matrix for all roles that are involved with **Product Information**, including all customer-facing roles
- Show evidence of a maintained training and qualifications register
- Engage with Manufacturers' training programmes and demonstrate support for employees to attend off site training courses applicable to their role
- Demonstrate understanding from all personnel of where, due to competency, they cannot provide **Product Information** and where appropriate refer back to the **Manufacturer**

Considerations

- How you test competence following training given
- How you assess new starters' competence levels
- Consider what competencies and training are required for your employees to relay **Manufacturer's Product Information**
- Consider what competencies and training are required for your employees who are creating new **Product Information**, whether verbal through advice or written through content
- Consider how you extend this out to your own distribution network, i.e., those 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

Ambiguous - open to more than one interpretation; not having one obvious meaning.

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

Webpage – Digital multi-media delivered via the internet.