

Examiner's report

Qualifications Framework

Stage 2: Product Safety

Written Examiner's Report May 2024

General

A total of nine candidates sat this examination during this round, and overall marks were in line with previous cohorts, ranging from 32% to 68% post moderation, with all but two candidates achieving a pass mark.

The standard of handwriting generally meant that the examiner was able to read scripts without significant difficulty, which is appreciated.

There was still some basic knowledge missing, or misapplied, but generally the standard was good and candidates are to be applauded for their hard work in learning what must be accepted as a complex subject area.

Section A

Q1

This question was attempted by two candidates. There appears to be some knowledge of RAMS but carrying out risk-based assessments, undertaking rapid intervention where there is serious risk and collaboration with Ports and Borders authorities was missed.

Q2

This question was attempted by four candidates and there were some good answers, but also confusion with PAS 7100 – 7050 assists in the development of a Product Safety Management Plan and 7100 with the incident plan.

Q3

This was a very popular question, being attempted by seven candidates. Unfortunately, there appears to be some misunderstanding of the specific compliance notice provided for under NLF regulations, with different regulatory frameworks and different effects cited by candidates.

Q4

This question was answered by all candidates, but with varying degrees of success. There appears to be a general ignorance of the process of designation, and that any presumption of conformity is rebuttable. Some reasonable answers and examples provided, however. It is noted that a typographical error led to the omission of the specific marks allocated to the part a and part b of the question, but there is no indication that this effected the standard of answer provided.

Q5

This was attempted by five candidates and there were some good answers provided, although most could have been clearer on defining product specification before design verification and then putting in place the necessary procedures, including inputs, processes and outputs, to maintain product specification

Q6

There seems to be some confusion with the GPSR and the NLF, and the applicability of the NLF to the UK market. Marks were missed in relation to placing on the market and making available on the market, but generally answers received a pass mark.

Section B

Q7

This was attempted by six candidates, but there was no mention of definition as a producer if repairing or refurbishing, or producer's obligations under GPSR, or PAS 7050 in relation to this type of business. Many good answers in relation to checks which may be carried out on inspection, however.

It would be helpful if candidates split their answers up into (a), (b) and (c) to assist in the marking process. There were some excellent discussions on practical checks

Q8

This question was attempted by seven candidates and there appears to be some confusion over the category of PPE – the manufacturer decides the categorisation and marks this on the product. Motorcycle gloves will be Cat 1 if only intended to protect against weather, or Cat 2 if intended to offer other protection. There was a lot of good answers around what conformity assessment looks like, but too little discussion of how product and documentation are tied together using traceability systems.

Q9

This question was only answered by one candidate and required a discussion of design risk assessment and management, the hierarchy of control, and the use of design standards by manufacturers, and then use of tools such as PRISM for decision making by regulators, where product hazards are identified.

Q10

A generally well answered question by the four candidates who attempted it with good use of case law, although it is clear that some candidates had run out of time at this stage. It needs to be emphasised however that the burden of proof for a statutory defence to be successful in avoiding criminal liability is on the balance of probabilities, and not the standard criminal one of beyond all reasonable doubt.