PRIMARK®

PENNEYS
Operated by PRIMARK®

Metal Control Policy

April 2011
Issue 2

Primark Stores Ltd - Metal Control Policy

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Section A - An introduction to metal control

Why is metal control important?

Primark Stores Ltd have a duty to its customers to provide safe, quality products. This duty is drawn both from our company values and from EU legislation.

EU laws stipulate that poor quality and safety of products sold in our stores could result in serious legal action against the company. The Consumer Protection Act 1987 makes it a criminal offence to supply consumer goods that fail to comply with general safety regulations (General Product Safety Regulations 1994).

This means that any kind of contamination of our products which poses a risk to our customers' safety is completely unacceptable. We have therefore produced this guide regarding safe working practices and procedures for metal control to help you to eliminate the risk of metal contamination.

What areas does metal control cover?

Needles – sewing machine, knitting machine and hand sewing . Kimball gun needles, blades, knives, scissors and other tools for cutting.

Any sharp instrument used during production which can cause harm or is serious safety risk

All processes that require needles (including storage, issue, use and disposal) need precise control. These policies are not difficult to put in place but rely on clear instruction to and cooperation of all workers, supervisors and managers.

Scissors, knives and cutting blades

- Scissors of all sizes are used in many sections of a factory so they need to be used responsibly. Scissors must be securely attached to work stations or issued and collected at the beginning and end of each day.
- Cutting room blades, needles and scissors, must be issued and collected at the beginning and ed of each day.

Pins, staples, nails and metal components

You need to list all the metal items you use in your factory. This should include pins and staples as well as metal components that you might apply to garments during the manufacturing process. Some examples include: poppers in babywear, studs and rivets in denim, and buttons on garments.

Examples of situations where trims can provide a risk of metal contamination:

- Rolls of lace that are secured by pins
- Brand labels which are attached with safety pins
- Documents with staples
- Sub-contracted processes: Embroidery and beading, where adequate controls are not established.
- Small fasteners like snap fasteners can easily be dropped into pockets or baby grows with enclosed feet. Ensure your quality control inspection includes turning enclosed areas inside out to remove any loose items.

What needs to be in place for an effective Metal control policy?

Having an effective metal control policy requires a number of procedures to be established.

- **A procedure for replacing worn and broken needles:** Clear documented procedures that cover all the processes, using all types of needles in your manufacturing sites – internal and external. Suggested procedures are provided in this document (see Section C).
- **The control of metal tools and small component parts used in the production process:** Clear documented procedures that cover all other areas of risk for metal contamination in your manufacturing sites – internal and external. Suggested procedures are provided in this document (see Section C).
- **A metal detection procedure:** Clear documented procedures for your methods of detecting metal contamination. Suggested procedures are provided in this document (see Section C).
- **Training of all relevant employees:** All workers in the manufacturing unit must be properly trained in order for the metal control policy to be effective.
- All new staff must be trained on metal control procedures. It must be part of your induction training programme.

Management support and constant policing of the procedures:

An effective metal control policy requires constant monitoring and checking. This can be done in a number of ways:

- Cleaning staff to report any sharp metal pieces found during cleaning
- Regular checks of the production areas on floors, work surfaces and drawers
- Check record sheets for accuracy or mistakes
- Periodically carry out the self assessment checklist (provided in this document – see Section E) to review the whole process, including external locations if used.

All management must be fully committed to initiating these procedures - it is critical to establish them into everyday practice.

Metal control policy, must be incorporated into your own internal policies.

What are the consequences of poor metal control?

The injuries resulting from metal contamination can range from scratches and cuts to fatal injury if bits are swallowed by children. Therefore, we need your commitment to implementing effective procedures in all manufacturing sites used for Primark/Penneys production and maintaining these procedures to the highest standards with constant monitoring and regular, effective training.

Section B - So how good are your metal control procedures?

You may already be running what you consider to be good metal control procedure, in which case this will also satisfy Primark's requirements?

You can have good written procedures but are they really working in practice?

Staff turnover and daily production pressures can have significant negative impacts on the standards of procedures.

We have included a checklist that should be used regularly to test your standards.

If you have any negative points from the self assessment checklist then you need to review your procedures and carry out re-training, using this guide to reinforce your factory's standards.

The self assessment checklist is available in Section E.

Section C - Metal control procedures

Needle Control

This section provides procedures for a variety of situations involving sewing and knitting needles.

Sewing and Knitting Needle Control

This needle control policy covers the strict control of all needles to ensure that the only ones in use are for the manufacturing process and that the disposal of all worn or broken needles is carried out by authorised personnel.

- The only needles allowed at work stations are those currently needed to operate the machine process. No spare needles should be held at machine point.
- New needles are kept in a locked location only to be accessed by trained, authorised personnel.

Worn and damaged needle replacement

- Needles which are worn or damaged but not broken are to be collected and a new needle must be issued by the authorised personnel.

- Old needles are to be disposed of into a sealed jar or tin with a small opening in the top. The jar must be kept in the secure location and disposed of responsibly. For manual and automated knitting machine needles, sealed disposal containers can be placed near the machines.

- The number of worn or damaged needles should be counted and used to update the needle audit report (see Section F).

Broken needles

- When a needle breaks, the operation must be stopped and the supervisor informed.
- All the needle pieces must be located and checked against a whole needle to make sure all the pieces have been found.
- The pieces must be immediately attached to the record sheet with clear adhesive tape and fully recorded with all information (see Section F).
- A new needle may only be issued when it is confirmed that all the needle pieces are found.
- If all needle pieces cannot be found then the product being worked on and any other work in close proximity must be placed into a bag or box and taken to the isolation area for further checking.
- The workplace must be checked with a hand-held metal detector or magnet before work restarts. The hand-held detector must be calibrated and operating correctly, using the 1.2mm test piece before being used.
- Check for the missing needle pieces in the isolation area. If found, all the pieces are to be recorded on the record sheet as normal. If not found, the products must be placed in a polythene bag and deposited in the secure reject box ready for disposal later.
- When the workplace is confirmed as ***clear***, then a new needle can be issued – the policy must be ***'one needle out, one needle in.'***
- Record sheets should be kept for a minimum of one year.

Other situations

Machine maintenance

- Machine operators must remove all needles from the area in and around machines. Machines that are not in use must also be cleared of needles.

Embroidery

- Machine embroidery embellishment must be controlled in the same way as main production processes, whether within your factory or at a sub-contracted specialist unit. Ensure the same procedure is applied and regularly monitored.

Sample room

- The same needle procedures should be implemented in sample rooms.

An example of a broken needle record sheet is provided in Section E. Record sheets must be kept for a minimum of one year and be provided for inspection upon request.

Hand Sewing Needle Control

The issue of hand sewing needles is just as important as control of machine needles.

- Hand sewing needles are to be issued to necessary workers and logged in a record book. At the end of the work session, or day, the issued hand needles must be returned and accounted for.
- Hand sewing needles are not to be used as a tool: e.g. removing fabric flaws. Alternative tools must be provided, such as a quick unpick. The issue of such tools should be logged and returned at the end of each working period.

Kimball gun needles

- Kimball gun needles need to be controlled and disposed of in the same way as worn and broken sewing machine needles.

Metal tools and trims

This section covers some of the other metal items in a production environment that are a potential safety risk. This is not a comprehensive list as you may have specialist equipment that is not covered in this document.

Ensure that you make a risk assessment of your particular working environment and that you put controls in place that cover all potential problem areas or processes.

Blades and knives, scissors and snips

Knives, blades, scissors and snips can be used in every area of the factory from cutting rooms to warehouses. For example: A knife that is lost in a shipping carton can result in a bad injury for someone working in the receiving warehouse.

- All new and used cutting blades for band knives and straight knives must be kept in a locked cupboard with access only by the cutting room supervisor.
- Records must be kept of new blades in stock, issued blades and returned blades so that every blade is accounted for.
- Under ***NO*** circumstances can old blades be turned into knives for use in the production area.
- Old blades must be disposed of responsibly on a regular basis.
- Where knives are needed to open containers, these should have a retractable blade, be numbered and stored at the end of each day in a secure cupboard.
- Small scissors and snips must be tied to work stations – this applies to ***ALL*** areas used for cutting, sewing, inspection, pressing, warehouse, etc.
- Large scissors in the cutting room and sample room are to be numbered and stored in a secure cupboard at the end of each working day. The supervisor responsible for scissors must check all have been returned.

Pins and staples

A ***'metal-free zone'*** must be applied to all childrens wear production areas. The risk of injury to children is the most serious, as swallowing sharp metal objects can result in serious injury and even death.

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- Pins and staples must not be used anywhere in the production area, including the sample room.
- Tape and magnets should be used to attach notices to notice boards.
- Documents issued into the production areas must not use staples to affix samples or extra pages. Plastic clips or tape are possible solutions.
- Trims (such as rolls of lace) that are secured with pins should be removed before being sent to the production area. Ask suppliers to use alternative methods wherever possible.

Small metal component parts

Rivets, snap poppers, studs and metal buttons need to be controlled in the production area so that loose ones cannot become trapped in pockets or other enclosed parts of the garment.

Where it is not possible to automatically feed these items during the attaching process, then work areas must be set up to contain these small metal parts.

- Work benches with raised sides to prevent small metal components from dropping onto the floor.
- The issue of trims in smaller manageable containers can help prevent accidental loss of these small sharp metal trims.
- Poppers (snap fasteners) used in the production of baby garments are very high risk and needs careful control.

REMEMBER:
One needle issued for one needle returned.
Metal Control is EVERYONE's responsibility – training is essential.

Metal Detection

Metal detection is part of the overall Metal Control Policy and must not be viewed as a replacement for an effective needle control policy.

Primark Stores Ltd require the following to be placed through a metal detector:

- ***ALL* children's wear**: Children's clothing, accessories and footwear: ***ALL MUST*** be 100% metal detected before being packed into cartons.
- Adult lingerie and underwear, adult nightwear and adult swimwear: ***ALL MUST*** be 100% metal detected before being packed into cartons.

Adult clothing, such as outer wear, blouses, shirts, trousers etc are not mandatory but if you have a metal detector then it is good practice to use this for all production. This good practice helps maximise the return on this valuable piece of equipment.

When used on children's wear, adult lingerie and underwear, adult nightwear and adult swimwear the metal detector should include the following features:

- A conveyor belt type detector where the garment passes through an aperture of no more than 127mm in height.
- The conveyor automatically stops and sounds an alarm when metal is detected.
- The metal detector can detect ferrous metal of 1.2mm.
- The machine must be located away from other sources with magnetic fields such as clutch break mechanisms in sewing machines and ceiling fans. Ideally this should be recommended by the machine supplier.
- The position of the detector must allow a direct flow of all products through the machine so that no garments miss this important checking stage. Ideally the metal detection area should be in a separate area between final QC and Packing. No childrens garments or garments requiring metal detection should pass directly to Packing. (See Section F).
- The machine should only be operated by trained personnel, ideally trained by the machine supplier.
- The metal detection machine should be serviced by the machine supplier every 6 months.

Photographs can be seen in the ***Photograph Guide*** in Section F.

Metal Detection Procedure

Calibration

Metal detection machines are sensitive instruments and need daily calibration when in use

- The machine should be calibrated when switched on and then at least 4 times per day.
- A 1.2mm test piece provided by the machine supplier should be used to test if the machine is detecting correctly. It should be fed through 3 times at the left side, centre and right side of the conveyor belt.
- If the test piece is not detected then the service engineer must be called in to fix it.
- If the calibration is successful then the machine can be used for production checking.
- Each daily calibration must be recorded on a record sheet – an example is provided in Section E.

Metal detection in production

- Garments should be packed wherever possible and put on the conveyor one at a time.
- When successfully passed through the detector, each item can be packed into cartons but should be kept in the quarantine area until the next successful calibration. Only then can the goods be released for shipping. If the detector fails the next calibration then the goods in the quarantine area will need to go through again when the machine is fixed.
- Any item which fails the metal detection should be taken to a designated inspection area and checked. When the metal piece is found, the garment can be re-checked and only put to stock if it successfully passes through the detector.
- If the metal piece is not found then the item must be cut up and placed in the secure reject box.
- A separate record must be kept of metal detection failure - an example is provided in the Section E.
- Record sheets should be kept for a minimum of one year.

REMEMBER

Metal detection is part of the control policy and not a replacement for good needle control practices

Section D - Penalties; Non compliance

In the event that a needle or any other sharp or unsafe object is found in a garment, product or shipment, Primark Stores Ltd will take the follow actions.

First Offence;

- The supplier will incur a penalty fine of USD $5000.
- ***All*** of the ***FACTORIES*** used by the supplier which are nominated for the production of Primark product will be subject to an immediate and fully comprehensive inspection of all needle and metal control policies and procedures within the factory / factories.
- The inspection will be at the expense of the supplier.
- Primark Stores Ltd will nominate the 3rd party company which will carry out the inspection.
- Time scales for corrections of non compliance with the needle and metal control policy will be agreed accordingly by Primark Stores Ltd.

Second Offence;

- The supplier will incur a penalty fine of USD $5000.
- ***All*** of the ***FACTORIES*** used by the supplier which are nominated for the production of Primark product will be subject to an immediate and fully comprehensive inspection of all needle and metal control policies and procedures within the factories.
- The inspections will be at the expense of the supplier.
- Primark Stores Ltd will nominate the 3rd party company which will carry out the inspection.
- Time scales for corrections of non compliance with the needle and metal control policy will be agreed accordingly by Primark Stores Ltd.
- ***ALL*** of the ***FACTORIES WILL*** be subject to a further 3rd party inspection to validate agreed improvements.

Third Offence;

- The supplier will incur a penalty fine of USD $5000.
- Primark Stores Ltd will no longer permit the use of the factory / factories which continue to fail to comply to Primark's 'Metal Control Policy'. These factories will be ***DIS-ENGAGED.***

SECTION E
Self Assessment Checklist for Metal Control Standards

Assessed Site Details						
Factory name and location						
	Subcontractor		Own facility			
Areas checked	Yes	No	Summary of findings			
Sample Room						
Cutting / parts preparation						
Weaving/Knitting						
Assembly/sewing						
Finishing						
Packing						
Specialist process/machinery						
Overall standard acceptable?						

Checklist for Metal Control Standards – Needles/Scissors/Metal items in general				
Ref	Check Point	YES	NO	Comments
N1	Is there a secure location for keeping needles?			
N2	Is there a secure location for keeping other metal items?			
N3	Is there a trained, authorised person to issue needles or other metal tools?			Name :
N4	Do the authorised people fully understand the procedure?			
N5	Is there a needle record sheet for broken needles?			
N6	Is it correctly and accurately completed?			
N7	Are all broken needles included on the record sheet?			
N8	Do workers understand the metal control procedure in this area?			
N9	Is there a clear procedure for dealing with missing broken needle pieces?			
N10	Are there any spare needles at the machines?			
N11	Are there any broken needles on the floor?			
N12	Are there any untied small scissors at machines?			
N13	Are there any old cutting blades being used as knives?			
N14	Are there any other sharp metal items in the work area?			Detail :
N15	Has training been given to personnel for Metal Control?			Date of last training :
N16	Are there pins or staples used in this area?			

SECTION E
Self Assessment Checklist for Metal Control Standards

Checklist for Metal Control Standards – Metal Detection				
Ref	Check Point	YES	NO	Comments
MD1	Is the metal detector located so all items pass through without being missed?			
MD2	Has the metal detector been serviced in the past 6 months?			Last date of service :
MD3	Does the metal detector only detect non-ferrous metal?			
MD4	Is the machine operator trained to use the machine?			Date trained :
MD5	Does the operator have a good knowledge of the working procedures?			
MD6	Is the machine calibrated when in use?			How many times per day :
MD7	Is there a test piece used for calibration?			Size of calibration piece :
MD8	Is a record kept of each calibration?			
MD9	Is the production passed through the metal detector isolated until the next calibration?			
MD10	Is a record kept of the number of items metal detected?			
MD11	If metal is detected, does the conveyor stop and an alarm sound?			
MD12	Is there a record sheet for metal pieces found?			
MD13	Is the machine restarted by a key?			Who has the key?
MD14	Is there an isolation box for items where the metal contamination cannot be found?			

Additional observations

Assessed by – name/company/position	Signature and date

SECTION E

Broken needle record sheet - EXAMPLE ONLY

Date	Style number / Customer	Needle Type	Machine number	Operator name	Actual needle pieces	All needle parts found? Yes / No		If no, action taken	Signature
25/05/2009	1234/Good Designs	Overlock	2788	J.Jones	Stick needle pieces here	√			Signature of responsible person
25/05/2009	1234/Good designs	Lockstitch	2533	L.Baker	Stick needle pieces here		√	Put through metal detector and pieces found	Signature of responsible person

SECTION E

Needle Stock Record Sheet – EXAMPLE ONLY

Date	Needle Type	Issued to : Area	Issued to : Name	Number of needles in stock	Number of needles issued	New balance of needles in stock	Signature
25/05/2009	Blind Hem	Sewing line 2	P.Smith	100	20	80	Signature of responsible person

SECTION E

Daily Machine calibration record			Date: EXAMPLE ONLY	
Time	**Pass**	**Fail**	**Operator Name**	**Signature**
9am	3 x test OK		J.Smith	Signature of trained person
This form is to be used to record one full day of production passed through the metal detector. Use a new form at the start of each new day				

SECTION E

Garments metal detected - record sheet EXAMPLE ONLY

Date	Time- To/from	Worker name	Item description	Style Number	Order number	No. Passed	No. Failed	Signature
25/05/2009	*9am to 11am*	*J.Smith*	*Print top*	*1234*	*PO12345*	*750*	*0*	*Signature of operator*

SECTION E

Metal detected record sheet EXAMPLE ONLY							
Date	**Time**	**Operator name**	**Item description**	**Style No./ Order No.**	**What was found?**	**Location of object and action**	**Signature**
25/05/2009	*1.30pm*	*J.Smith*	*Print top*	*1234/PO 12345*	*Needle piece*	*Neck seam/removed*	*Operator signature*
25/05/2009	*4pm*	*J.Smith*	*Print top*	*1234/PO 12345*	*Not found*	*Item placed in reject bin*	*Operator signature*

SECTION F
Photograph Guide

Conveyor belt metal detector well positioned into a secure isolation area

✓ **CORRECT PRACTICE**

Section F- Photograph Guide

Conveyor type detector placed at the end of the packing area and with some simple barriers can ensure all goods go through the process. This model has an automatic recording system.

✓ **CORRECT PRACTICE**

Section F- Photograph Guide

Secure disposal for items which fail the metal detector process

✓ **CORRECT PRACTICE**

Section F- Photograph Guide

Incorrect positioning with no natural flow from the packing section and no record keeping – a rarely used valuable asset

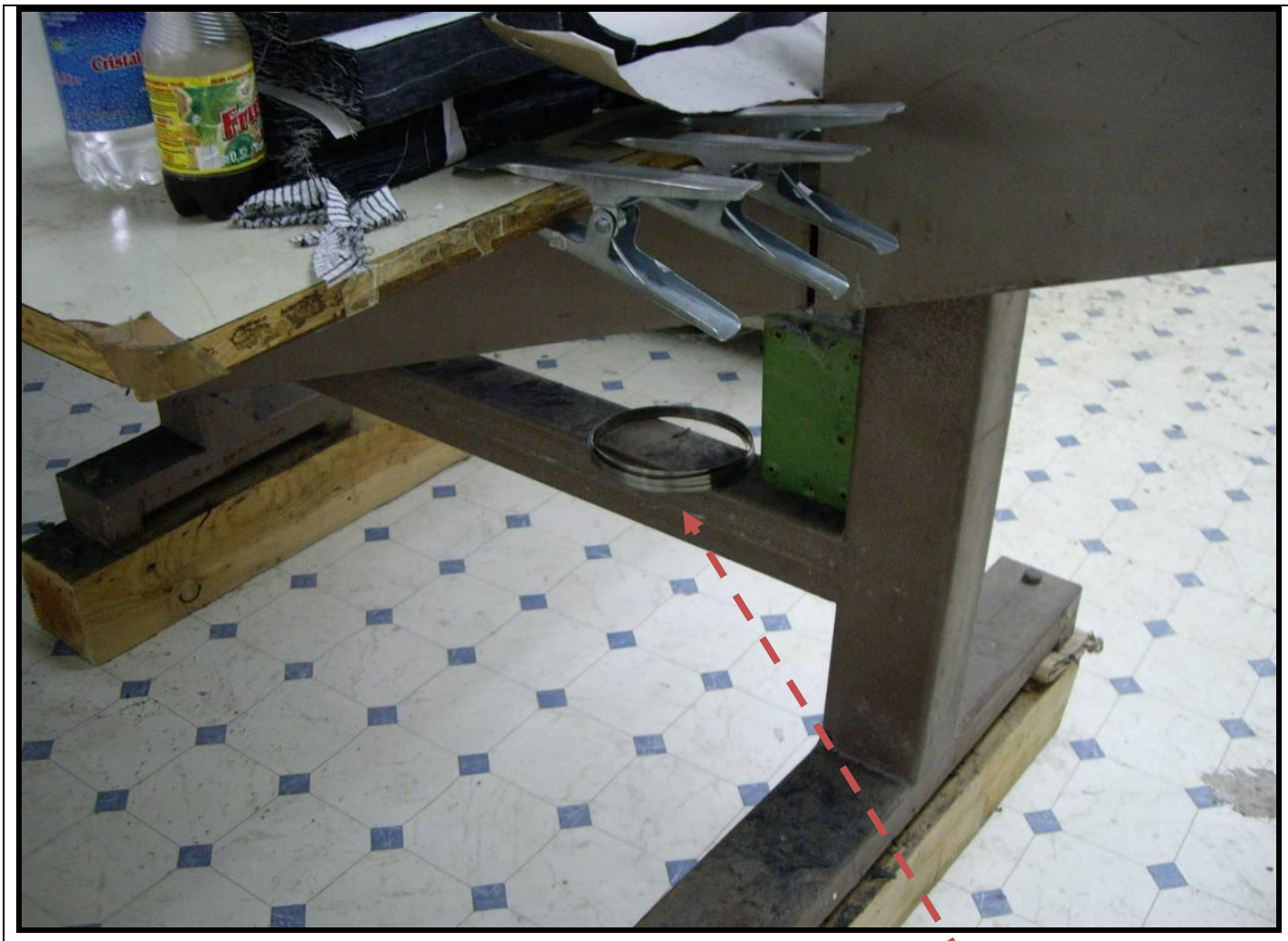
X INCORRECT PRACTICE

Section F- Photograph Guide

Small scissors tied to workplace

✓ **CORRECT PRACTICE**

Section F- Photograph Guide



Band knife blade left in the work place. Should be kept in a secure location

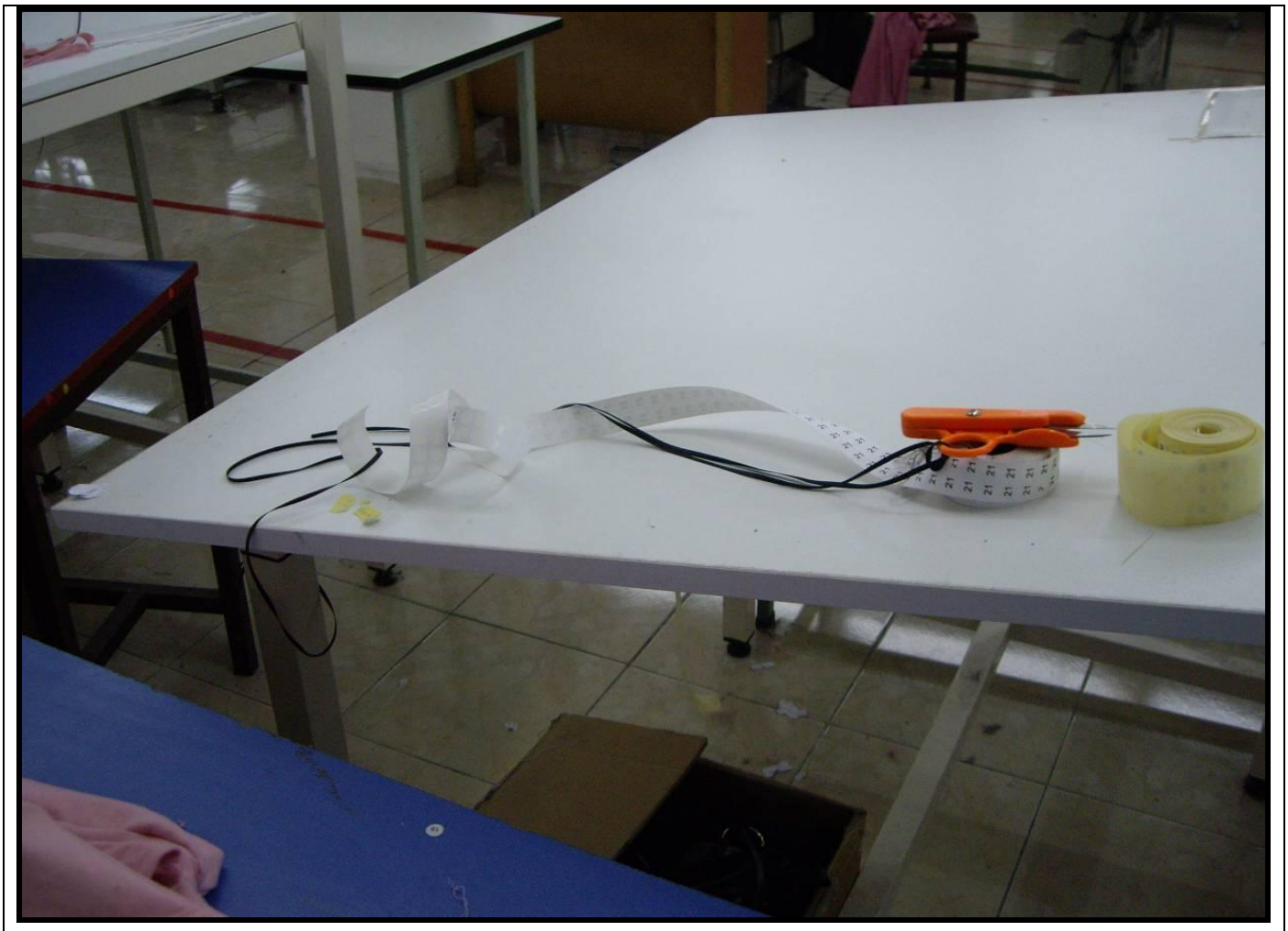
X INCORRECT PRACTICE

Section F- Photograph Guide

Scissors not secured to workplace and screw driver not stored in designated area

X INCORRECT PRACTICE

Section F- Photograph Guide



QC small scissors attached to work bench

✓ **CORRECT PRACTICE**

Section F- Photograph Guide

Lip around work bench for containing small metal trims

✓ **CORRECT PRACTICE**

Section F- Photograph Guide

Clear information about metal free areas

✓ **CORRECT PRACTICE**