

James Walker	Title: Counterfeit, Fraud and Suspect Items	Date: Oct 12, 2023	Rev: 1	Page: Page 1 of 3	Document No: QPD02 Approved by: Quality Manager
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REASON FOR UPDATE: New procedure

ASSOCIATED DOCUMENTS: [QSM1](#), [DEF STAN 05-135](#), [F508](#), [QPD52](#), [QPD101](#), [JW CFSI Compliance Statement](#)

1. **PURPOSE**

- 1.1 To provide a procedure for the detection, mitigation and prevention of suspect, fraud and suspect items.

2. **SCOPE**

- 2.1 This document applies to all those involved with the sourcing and procurement of components and the subsequent associated receipt and inspection activity.

3. **RESPONSIBILITY**

- 3.1 The Quality Manager is responsible for updating and communicating the details within this procedure.

4. **PROCEDURE**

4.1 **Definition of CFSI (Counterfeit, Fraudulent and Suspect Items)**

4.1.1 Materiel (or other suspect items) whose origin, age, composition, configuration, certification status or other characteristic (including whether or not the materiel has been used previously) has been falsely represented by;

- a) misleading marking of the materiel, labelling or packaging;
- b) misleading documentation; or
- c) any other means, including failing to disclose information;

except where it has been demonstrated that the misrepresentation was not the result of dishonesty by a supplier or external provider within the supply chain

4.2 **Roles and Responsibilities**

4.2.1 **Top Management**

James Walker & Co Ltd recognises that counterfeiting and fraudulence of parts is a serious global issue and as such, we have taken action to mitigate, and where possible, prevent counterfeit, fraudulent and suspect items use and their inclusion in product(s) delivered to our customers.

4.2.2 **Management Representative**

The James Walker & Co Ltd Quality Manager has been appointed as the representative who, irrespective of other responsibilities, has the responsibility and authority within the organisation to:

- a) ensure that the arrangements required to manage the risk of CFSI in both the organisation and supply chain are implemented and maintained.
- b) report to top management any concerns regarding CFSI within the organisation and supply chain.

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c) promote awareness of the risk of CFSI in the organisation and the supply chain.

4.3 Competence, training awareness

The organisation has identified and trained appropriate persons in the awareness and prevention of counterfeit, fraudulent and suspect items.

4.4 Purchasing

4.4.1 The organisation only procures parts from an internally controlled approved suppliers list where criticality of supply forms part of the risk assessment criteria.

4.4.2 Where a supplier in to the organisation does not maintain their own CFSI mitigation process, the requirements are flown down and acknowledgement requested in accordance with internal procedure F508.

4.5 Test and Verification

4.5.1 The organisation has determined the inspection and test requirements for the acceptance of incoming parts and material in accordance with internal procedure QPD52.

4.5.2 Where there is suspicion of counterfeit or fraudulent items, additional testing shall be considered to confirm if it is counterfeit.

4.6 Control and Reporting of Non-Conforming Parts or Items

4.6.1 CFSI at goods receiving stage shall be subject to internal quarantine procedures in accordance with QPD52.

4.6.2 The parts or items should not be returned to supplier to prevent the risk of it being re-introduced into the Supply Chain.

4.6.3 Escalation of CFSI parts or items shall be via the Quality Department for the purpose of further investigation and reporting as appropriate to;

- a) the customer
- b) the supplier of the material
- c) the owner of the Intellectual Property Rights of the genuine material
- d) appropriate information / data gathering organisations including, but not limited to:
 - 1) British Electrotechnical and Allied Manufacturers' Association (BEAMA).
 - 2) Anti-Counterfeiting Forum
 - 3) Medicines and Healthcare Products Regulatory Agency (MHRA).
- e) National Law Enforcement Authorities (see note).

Note: In the UK the occurrences of counterfeit materiel are to be reported to the Police and Trading Standards.

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4.7 Obsolescence

The organisation has implemented a robust management of change control procedure (QPD101) including where material or part obsolescence is a factor.

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