



Product Safety Focus Group Joint Guidance with the British Blind and Shutter Association (BBSA) on Internal Window Blinds

Enquiry:

Norfolk Trading Standards have been working with the BBSA to establish a document which can be used to provide Trading Standards Officers with a reference guide to ensure consistency of enforcement on the standards implemented for internal window blinds.

The attached Guidance was presented to the Product Safety Focus Group and there was a majority in favour of adopting this document as a point of reference for officers in the field.

Guidance

STANDARDS AND REGULATION

On 27 July 2011 the EU issued a Decision (2011/477/EU) entitled: "*Commission Decision on the safety requirements to be met by European standards to address certain risks posed to children by internal blinds, corded window coverings and safety devices pursuant to Directive 2001/95/EC of the European Parliament and of the Council.*"

This mandated CEN to revise the only standard for internal window blinds to reflect the requirements of this Decision and this has led to a revised standard and two test method standards being released by CEN on 19 February 2014.

On 28 February 2014 BSI published these standards in the UK:

- **BS EN 13120:2009+A1:2014** – *Internal blinds – Performance requirements including safety*
The amendments predominantly affect Section 8, Safety in Use, Section 15, Information for Installation and Use and Section 16 Marking
- **BS EN 16433:2014** – *Internal blinds – Protection from strangulation hazards – Test methods*
- **BS EN 16434:2014** – *Internal blinds – Protection from strangulation hazards – Requirements and Test methods for safety devices*

In essence the standards define a "safe product" and therefore compliance with these standards affords a presumption of conformity with the General Product Safety Regulations, 2005.

REQUIREMENTS OF THE STANDARDS

The child safety requirements of these standards (which cover every type of internal window blind) run to some 45 pages and in summary require:

- Safety devices for preventing any cords or chains from creating a hazardous loop
- The testing of all safety critical systems of internal blinds
- The testing of blinds using safety systems
- The fitting of safety devices on cords or chains at the point of manufacture
- Limitation on cord and chain lengths
- Warnings and instructions
- Packaging and point-of-sale

The standards are at attestation level 3 permitting self-testing. Many larger companies are using external test houses as well.

WHICH PREMISES ARE AFFECTED?

The EU Decision and standard deal with internal blinds with cords and chains that could create a hazardous loop *"intended to be installed in premises where children 0-42 months are likely to have access or to be present."*

Our view is that this means that professionally installed blinds must be compliant in **ALL** homes and **ALL** public buildings irrespective if children are present at the time. This view is based on the typical lifetime of window coverings and the use of the word "likely" in the EU Decision.

Commercial buildings should be subject to a risk assessment to ascertain if child safe blinds are required.

MAKING EXISTING WINDOW BLINDS SAFER

Existing blinds that are installed are not covered by the new standards but we strongly urge those responsible for or using blinds in all homes and public buildings to consider making existing blinds safer by using compliant retrofit safety devices.

At the very least cords and chains should be kept out of reach of babies and small children.

Retrofit safety devices must be compliant with BS EN 16434:2014.

"...all reasonably foreseeable environments where young children have access to or are likely to be present, such as, for example, homes, hotels, hospitals, churches, shops, schools, nurseries, and public places in general. Blinds and window coverings to be fitted in offices or any other place, which is transformed from its initial destination and where young children are likely to be present, shall also be subject to the present requirements."

CURTAIN TRACKS

The EU Decision also has requirements for curtain tracks.

ADVICE FOR TRADERS

If an internal window blind has cords or chains that could create a hazardous loop and the destination of that blind is unknown or could be where a child 0-42 months is present or likely to have access you must supply and/or fit a compliant product. Compliance is achieved through testing.

“Although at the time this standard has been published no standard exists for draperies, test methods specified in the present standard may be used for such products.”

- Always try to sell and install products that do not have cords or chains to operate them or have concealed or tensioned cords (safe by design)
- Ensure all corded internal blinds are compliant with the BS EN 13120:2009+A1:2014
- Ensure retail environments (shop and on-line) have appropriate point-of sale information and compliant display products to aid customer choice
- If fitting blinds ensure non-integral safety devices are always installed in all homes and all public buildings

Our view is that a consumer cannot remove the trader’s responsibility to install a safe product by signing a disclaimer. So if a non-integral device is required it must be installed by the professional installer. Such advice should have been given to the consumer before they made their purchase decision.

ADVICE FOR CONSUMERS

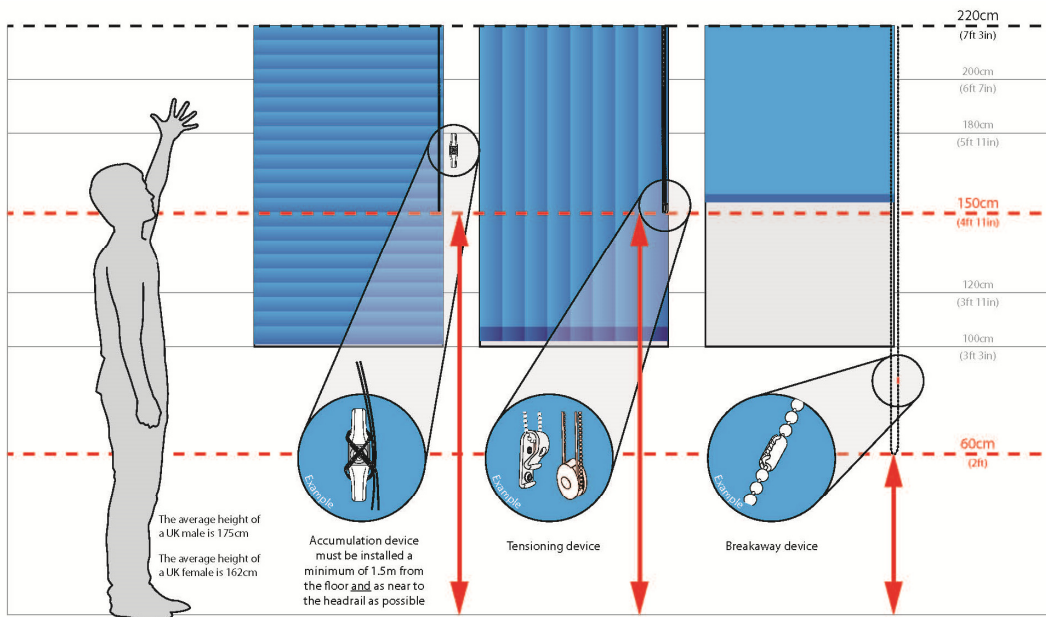
- When buying a new blind always look for one that does not contain cords or chains (for example a spring operated roller blind) or which has concealed cords
- Examine every blind in the home, especially in children’s bedrooms. If any have a chain or cord that is looped or could form a loop then make sure a safety device is used to keep the cord or chain securely tidied away out of the reach of babies and young children. These safety devices are low-cost and easy to retrofit, so you do not have to wait until you replace a blind to improve its safety
- Move cots, beds and any furniture away from windows and blinds – remember children love to climb
- Don’t forget to check for looped cords on curtain tracks and the position of curtain tiebacks too

FURTHER ADVICE FOR TRADING STANDARDS

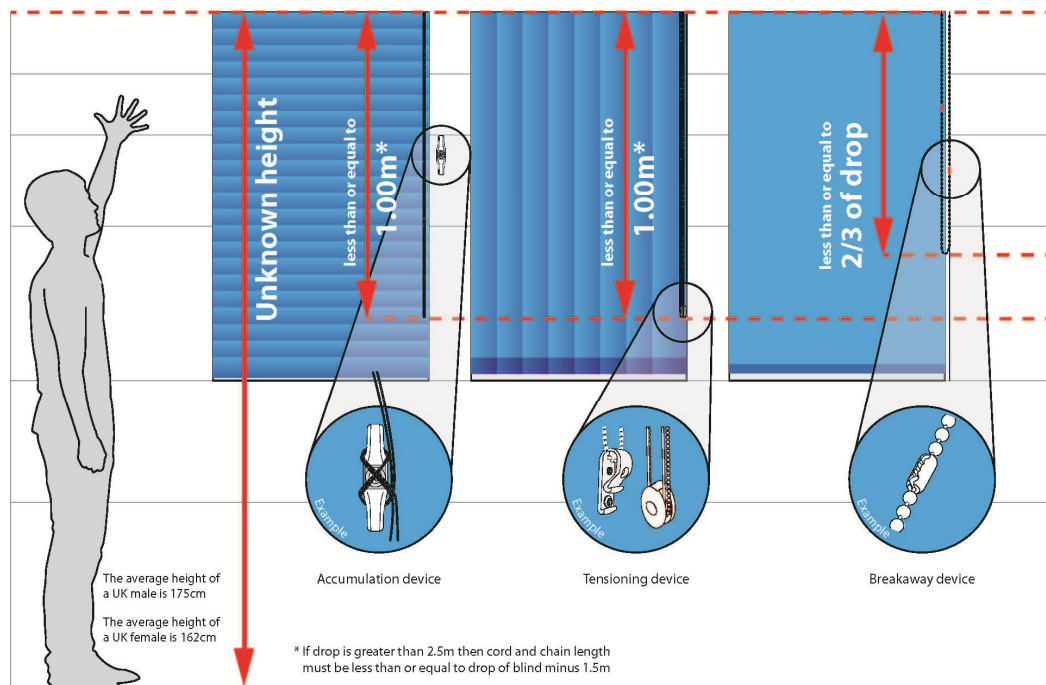
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Appendix 1

Maximum cord and chain lengths where installation height known



Maximum cord and chain lengths where installation height not know

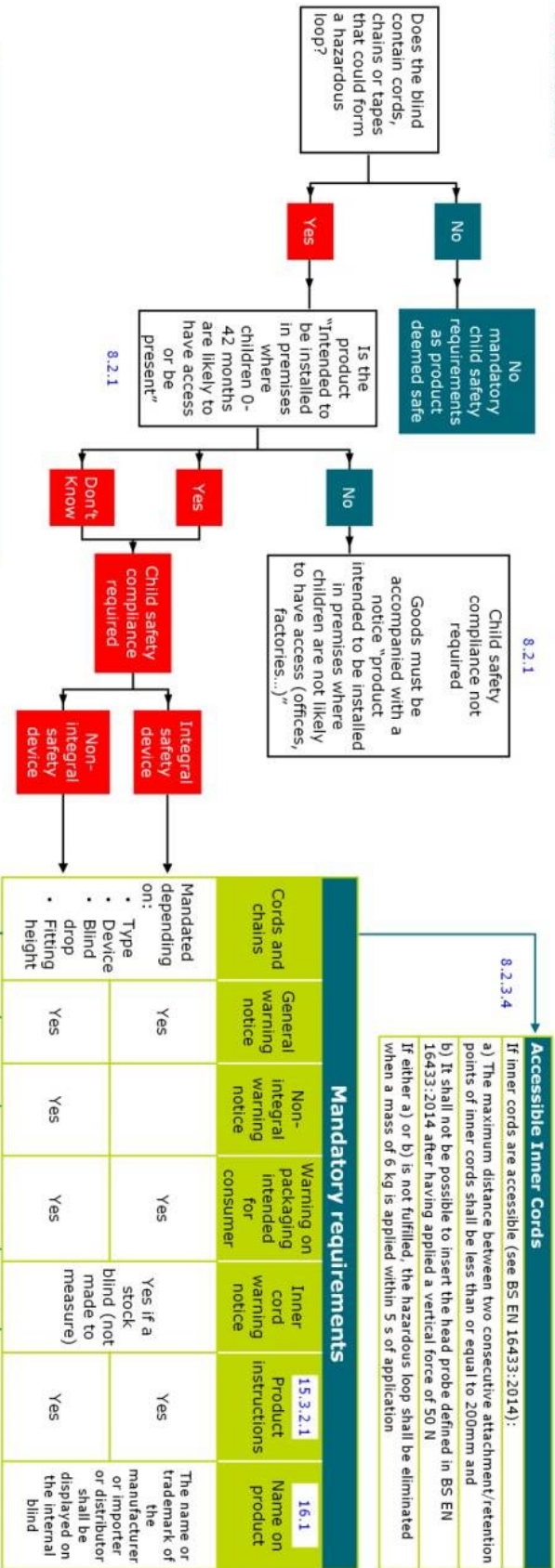


Note:

Where the fitting height is not known these are the maximum cord and chain lengths permissible. However, a professional installer must always install accumulation devices and tension devices a minimum of 1.5m from the floor. So if a consumer measures but requests a professional to install this will probably involve the adjustment of cords and chains on site.

Source: BS EN 13120:2009+A1:2014





Installation Height	Cord Length
Operating loop - Breakaway system	
Known	Distance from floor to bottom of cord shall be at least 0.6m
Not known	Less than or equal to 2/3 of drop
Operating loop - fixed tension system	
Known	Distance from floor to bottom of cord shall be at least 1.5m
Not known but drop less than or equal to 2.5m	Less than or equal to 1m
Not known drop but drop greater than 2.5m	Less than or equal to blind drop minus 1.5m
Pull Cords	
Known	Distance from floor to bottom of cord shall be at least 1.5m
Not known but drop less than or equal to 2.5m	Less than or equal to 1m
Not known drop but drop greater than 2.5m	Less than or equal to blind drop minus 1.5m

15.2.2.2

Children can strangle if this safety device is removed from cords or chains out of reach of children.

15.2.2.3

Children can strangle if this safety device is not used and added to the cord following the instructions and install accordingly.

15.2.2.2

WARNING

Young children can be strangled by loops in pull cords, chains, tapes and inner cords that operate the product.

To avoid strangulation and entanglement, keep cords out of the reach of young children. Cords may become wrapped around a child's neck. Move beds, cots and furniture away from window covering cords.

Do not tie cords together. Make sure cords do not twist and create a loop.

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Product Safety Focus Group

The group has its origins in the former LGR Product Safety Group. Membership includes representatives from the regional product safety enforcement groups, TSI and BIS. The group's purpose is to help co-ordinate regulation of consumer product safety, giving technical and policy support to Local Authorities and other organisations by providing specialist advice. Meeting at least twice a year the group's main form of communication is by email and through the Knowledge Hub.

Association of Chief Trading Standards Officers

The Association of Chief Trading Standards Officers (ACTSO) is the single membership organisation representing Heads of Trading Standards and regulatory services from councils across England and Wales. ACTSO supported by the Trading Standards Institute is focused exclusively on providing a comprehensive co-ordinated leadership forum at the national level whilst assisting members to lead their services both locally and regionally. ACTSO is happy to support and endorse the work of the Product Safety Focus Group.

Disclaimer

Legislation may change over time and the advice given is based on the information available at the time the guidance was produced. It is not necessarily comprehensive and is subject to revision in the light of further information. Only the courts can interpret statutory legislation with any authority. This advice is not intended to be a definitive guide to, nor substitute for, the relevant law. Independent legal advice should be sought where appropriate.

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