

**WHIRLPOOL UK APPLIANCES LIMITED'S RESPONSE TO  
REGULATION 28 REPORT TO PREVENT FUTURE DEATHS**

**DATED 7 MARCH 2018**

We are writing to provide Whirlpool's response to the Regulation 28 Report to Prevent Future Deaths dated 7 March 2018 arising out of the inquest into the death of Mrs Elizabeth Marion Griffin.

Before we address the report, we would like to take the opportunity to say how very sorry we were to learn of this tragic incident and would like to pass on our sincere condolences to the friends and family of Mrs Griffin.

We have reviewed carefully the comments of the Coroner set out in the Regulation 28 Report, and respectfully provide the following responses to the "Matters of Concern" raised in that report.

**WHIRLPOOL'S PRODUCT SAFETY PROCESSES**

The Coroner raised concerns over the length of timing of the safety campaign for the DWF Series 3 Dishwashers. We welcome the opportunity to provide some context to that safety campaign and Whirlpool's product safety processes.

The safety campaign was conducted in full cooperation with Trading Standards by Indesit Company UK Limited. At all times Indesit responded promptly to the information that was available to it.

In terms of Whirlpool's systems and procedures to deal with future issues that may arise, we take the opportunity to outline the following details of those systems and procedures which now apply following Whirlpool's acquisition of Indesit.

Whirlpool has a comprehensive set of policies, procedures, and guidelines in place for field monitoring, field safety investigations, analysis, risk assessment, and reporting potential safety hazards associated with its products in order to inform an expeditious decision on a field corrective action. These systems have been developed and refined over decades, and Whirlpool keeps those systems under review as part of its commitment to continual improvement.

Whirlpool's approach to product safety governance starts with senior leadership oversight, with a specially designated Executive Safety Committee. The membership of Whirlpool's Executive Safety Committee includes members of the Whirlpool senior leadership team from a cross-section of the company. This team is responsible for the decisions regarding the need to undertake field corrective actions for potential product safety risks that have been identified.

Whirlpool's Governance Model is implemented through formal corporate policies which define Whirlpool's position and philosophy on product safety, formally puts in place the product safety system, defines clear roles and responsibilities for all employees and functional groups, requires pre-market risk assessments, post-sale monitoring of product performance and safety, requires risk assessment of potential issues that are identified on units already with consumers, and defines required communication protocols for these risks. The Governance Model is supported and implemented through multiple corporate and functional policies and procedures.

Another important aspect of product safety governance at Whirlpool is the built-in system of checks and balances. Whirlpool has established an independent Global Product Safety Team which operates separately from product development, engineering, and commercial teams. The independence from the product development, engineering, and commercial teams allows this team to make unbiased decisions that are focused first on safety. This team has a direct link to the Whirlpool senior leadership team.

Whirlpool requires a continual assessment of risk of potential safety hazards throughout the lifecycle of the product, from product development, to marketing, to disposal. This includes a formal and comprehensive pre-market risk assessment and safety audit, and continuous field monitoring of field hazard incidents and allegations.

Whirlpool's approach to monitor product performance in the field is a broad approach, practiced globally, that considers all reports that we receive involving our product where the consumer perceives their safety may be at risk.

Whirlpool receives information and data about potential product safety incidents from multiple sources, including among others, consumers, Trading Standards, Fire & Rescue Services and insurance companies.

When this initial contact occurs, every effort is made to gather as much information as possible regarding the appliance, the consumer, and the alleged incident. This allows us to both assist the consumer wherever we can, and it also allows us to investigate the matter in more depth.

Regardless of the source of the information, all such cases are channelled through to a dedicated team in the UK to ensure that we have a consistent approach with our initial investigation process throughout. We wish to make it clear that there is no reluctance on the part of Whirlpool to consider, and, as appropriate, place due reliance on information received from sources external to Whirlpool. Indeed, information from external sources is vitally important, including information received from experts not appointed by or on behalf of Whirlpool.

If an alleged incident description references any concerns of safety, efforts are made to arrange a visit to the consumer's home by a qualified service engineer to further assess the reported experience; to gain additional facts; and to better understand the alleged event. This access to the product allows for further assessment of the consumer's description and provides a better understanding and refinement of the physical facts to determine if our product may have behaved in a potentially unsafe manner.

If the information provided continues to lead the team to believe that the product's behaviour may have resulted in it failing in a potentially unsafe manner, then, wherever possible, arrangements are made to retrieve the product and return it to our Product Safety Team for a detailed inspection, here in the UK. Retrieving the product allows Whirlpool to conduct a more robust engineering inspection in a laboratory environment with the intent to identify and confirm the root cause that may or may not be consistent with the consumer's reported experience. If retrieval of the product is not possible (for example where the product cannot be released to us for legal reasons), where appropriate, throughout the country Whirlpool routinely uses third party, (independent) forensic engineers to support this work and examine the appliance on our behalf.

In some instances, the physical product may not be available or may not require a field replacement; however, the details of the report are still documented in our system and can be used qualitatively when an engineering investigation is performed.

Whirlpool's process is structured to funnel, along with other pertinent information, all machine inspection reports into one central database, irrespective of whether the report was generated by a Whirlpool employee or an independent forensic expert.

Every alleged incident that is reported to Whirlpool is investigated and at the end of the investigation, if safety-related in nature, is reviewed by the team of dedicated product safety engineers, and is judged on the merit of the information available, irrespective of the source of that information (be it internally or externally gathered information), including where appropriate with the further support of external experts. After this review, the incidents are categorised into a structured and searchable database so potential field safety hazards, that may require further action, can be identified, monitored, and assessed.

#### **Action taken or proposed to be taken**

Whirlpool continues to apply the processes described above on an ongoing basis, and will continue to carefully monitor reports from the field, and from other sources, which may involve risks associated with its products. These reports are dealt with promptly and without undue delay.

We trust that this additional information and further explanation helps in addressing any concerns that were raised during the course of evidence at the inquest.

## **ENCOURAGING REGISTRATION FOR ALL CONSUMERS**

The AMDEA (Association of Manufacturers of Domestic Electrical Appliances) 'Register My Appliance' scheme (at [www.registermyappliance.org.uk](http://www.registermyappliance.org.uk)) provides a central portal for consumers to register not only their kitchen appliances but also all electrical appliances in their home.

Whirlpool continues to be a prominent advocate within AMDEA both to promote consumer awareness of the scheme and to communicate to consumers why registration is so important. It features on our websites and across our consumer literature. We are proud to have the highest consumer appliance registration rate in the industry and one of the largest consumer databases.

### **Action taken or proposed to be taken**

Whirlpool participates in 'Register My Appliance' day, which takes place annually in January. The event provides the ideal opportunity to promote the purpose and benefits of the scheme and to encourage registration by consumers. We use the event as a platform to launch specific Whirlpool initiatives around registration of appliances. For example, in the lead up to the last campaign, Whirlpool offered prizes to encourage registration among consumers.

Whirlpool encourages registration of its products via both online and offline methods. Consumers are able to call a freephone number (0800 597 8557) if they do not feel comfortable using the online portal and prefer human interaction. Consumers who call the freephone number will speak to dedicated trained advisors who are available seven days a week. The advisors will login to the online registration portal to enter the consumer's details.

Whirlpool places a prominent coloured sticker on the front of every new product sold, which encourages consumers to register their products. Consumers are encouraged to call the freephone number or to register online. The sticker has been designed to make it highly visible to consumers, so they are more likely to register.

As part of its ongoing commitment to encouraging registration, Whirlpool includes details of the registration freephone number in its marketing materials both before and after sale.

Whirlpool continues to pursue initiatives to improve registration rates both for its own products, and within the industry generally. Over the past year Whirlpool has engaged in dialogue with key stakeholders including consumer advocacy groups and government agencies to consider options for addressing this important issue. For example, Whirlpool is actively leading discussions within the industry on how to improve consumer awareness of the 'Register My Appliance' site, make the site easier to navigate, and make the importance of registration clearer. In recent consumer communications, Whirlpool has also worked with consumer advocacy groups and charities to encourage registrations among more vulnerable members of society who may prefer human interaction to online registration.

Whirlpool will continue that dialogue, and intends to work to maintain its role as a leading industry player in this area.

### **PUBLICATION OF THIS RESPONSE**

As the Regulation 28 Report was published, Whirlpool thinks it appropriate for this Response to be published.

For and on behalf of **Whirlpool UK Appliances Limited**

Dated: 2 May 2018