

Making toys at home for Mothers' Union purposes

This fact sheet discusses the safety aspects we need to be aware of when making toys at home and distributing/selling these to people who are not always known or connected to us.

Definition of a Toy

'Products designed or intended, whether or not exclusively, for use in play by children under 14 years of age'

All toys supplied in the UK must meet a list of essential safety requirements which are set out in the Toy (Safety) Regulations 2011 and to prove that these requirements are met, all toys should be traceable, carry a CE mark, have clear instructions for use, and warnings where necessary.

Decorative items such as folk/cultural dolls intended for adult use are not considered toys and do not have to fulfil the same requirements as those for toys. However such items should be clearly marked as 'This is not a toy' or 'Intended for adult use only' or 'For decorative purposes only' to indicate that they are not toys and are therefore not intended for children.

There are clear guidelines and safety standards which have to be met when making toys for children's use. These are set out in BS EN71. Please take time to read these before embarking on any activities which involve making toys for children under the age of 14. However, as makers of toys at home, all the requirements of this safety regulations might not be relevant, but it is your duty to ensure you know what the requirements are and that your toys meet these. Parts 1st, 2nd, 3rd and 6th of the Standard are worth mentioning and are given below.

Part 1: Mechanical and physical properties

This standard contains requirements for the design, strength, performance and labelling of toys.

Part 2: Flammability

This standard contains requirements and test methods to assess the flammable characteristics of some toys and ensure toys are made of materials which are flame retardant.

Part 3: Migration of certain elements

This means limitation of chemicals that can be used in toys which could be dangerous if swallowed or chewed by a child, such as lead, cadmium and mercury.

Part 6: Graphical symbol for age warning labelling

This standard describes the proper use of the under 3 year pictogram on toys.

What does this mean to a homemade toy

- Toys must be strong enough to withstand the stresses and strains it could be expected to undergo during normal use.
- Toys should be designed and constructed in way that any accessible edges, protrusions, cords, fastenings or movable parts do not cause injury.
- Toys should be made of non flammable/flame retardant material or material that burns slowly if it ignites.
- Toys should be clean and hygienic.
- Toys and component parts intended for use by children under 3 years should be marked appropriately and be of such dimensions to prevent them being swallowed or inhaled.
- Toys and their packaging must not present risk from strangulation, suffocation or choking.

How can you meet these requirements

An ideal way to meet the requirements of the Toy (Safety) Regulations is to quality test all your products which can be considered as toys, even if your intention is not for the product to be used in such a way. In other words the law does not protect you, just because your toys state that they are not toys. Before embarking on making toys, always contact your local Trading Standards Office which can be found on [Local Trading Standards Office](#) .

Below are some steps you could consider taking to ensure your toys are safe for children's use. Please remember these are only guidelines and depending on the toys you are making these steps will need to be adopted. ***Test every different type of toy separately for conformity.***

- Agree the intended age group the toy will be used by and the measurements of the toy.
- Form a working group to test the toy for its appropriateness, durability and safety.
- Make a list of all the components you will need to make the toy. Make sure this list includes the make and model of the components and a list of reputable suppliers if possible. This way you can avoid counterfeits. Use only products that carry a CE mark or Kitemark, making sure your toys carry any warning already on the components/materials used in the production. This ensures that the components are already safety tested.
- Agree a step by step process or pattern you will follow to make the toy.
- Ask the group or other toy makers to make the toy, making sure you can identify the maker of each toy. This needs some sort of batch numbering.
- Test the toy. This can be done by the same group by swapping the toys so that the tester and the maker are not the same or by an independent group. Test should include normal wear and tear actions the toy will be subjected to during normal play
 - Pull, stretch, throw and squeeze the toy to see if any parts can cause injury, break or come undone during normal play
 - Test to ensure that its flammable properties adhere to the required standards
 - Use a magnet or other device to see if the toy has anything in it that it should not
 - Check/test the toy to see if its materials are made of (dyes/chemicals) that will not harm children. Please be aware that while a single component might not cause a threat, multiple components could.
 - Test the toy for hazards such as strangulation and choking
 - If there are button or eyes pull at these to see if they will break or come apart
 - If the toy can be washed, wash the toy to see if it can withstand washing
 - If the toy has any moving parts test these to make sure they are safe for children's use and follow safety guidelines
 - Carry out any other tests you consider necessary
- List all defects you have found and correct these and quality test the toy again and again until you are satisfied the toy is safe to use for its intended purpose.
- Revise your lists and also the pattern according to the latest agreed process.
- Agree a batching process by which you will identify the maker to the toy.

Now you have an agreed process to make each type of toy. Make sure every toy maker follows the same process to ensure conformity and periodically conduct a 'quality control test' to ensure that your toys are being made according to the instructions you have agreed.

Toy makers should understand the significance of these tests, and also the importance that will be places on the labels we attach to the toys, by users of the toys who will not always know us.

Labelling Guidelines:

All products designed or intended (exclusively or otherwise) for children's play or use must meet the essential safety requirements set out in the Toy (Safety) Regulations 2011 and carry a 'CE' mark which is the maker's declaration that the product satisfies the safety requirements.

CE marking can be done by the toy makers themselves and is not a safety or quality mark aimed at consumers. It is primarily an indicator to enforcement authorities (such as Trading Standards) that the toys bearing the mark are intended for sale in the European Community and give an assurance by the makers that the toys satisfy all the essential safety requirements applicable.

The complexity of self certification depends on the product as each and every component that has gone into making the toy plus the final toy itself needs to comply with the Toy Safety Standard. You can buy the Toy Safety Standard (BS EN71) from British Standard Institution (BSI) or you may be able to get a free copy from the local Trading Standards Office. You can buy a helpful pack called [Self Certification Pack](#) from Conformance.co.uk. You can also use a 3rd party company to test either the components or the full product and produce a Declaration of Conformity to show that your toys reach the appropriate standards and is safe for children.

CE mark can either be a sewn in label on your toy or a tag style label around your toy. CE mark must be at least 5mm in height and must be easily legible and permanent. If the toy is small the CE mark, name and address can be put on a removable label attached to the toy and must state 'Please retain this information for future reference'.

Labels on toys must also carry the name and address of the maker.

There should be clear warning on the label to indicate of any inherent risks such as 'not suitable for children under 3 years due to small parts' or 'could cause choking if swallowed'

In order to be able to put a CE mark on your toys and to ensure good practise, always keep a step by step guide (sometimes called technical file) with the following information

- ✓ A step by step description of the process followed to make each type of toy with a process to identifying the batch the toy has come from.
- ✓ An explanation as to how the toy meets BS EN71 (amended for your own legal requirement in Southern Ireland and Isle of Man)
- ✓ Details of any tests that you (or a third party) have carried out on the toy, purpose of the testing (quality assurance etc.), sample tested with results obtained.
- ✓ A list of all suppliers of materials and components, including their names and addresses that have gone into producing the toy.
- ✓ All documentation you have that your materials and components comply with the BS EN71 requirements.
- ✓ The addresses where the toys are made.
- ✓ Label used on the toy to inform its purpose and limitations.

Mary Sumner House will be happy to help you with any queries, relating to CE marking and also with the production of the appropriate labels for use. As a minimum we recommend the use of labels that will be made available to you by Mary Sumner House, which will state who has made the toy along with contact details in case of queries. Please contact MU@mothersunion.org or telephone and talk to Daylia Brown with your queries in the first instance.

Toys are meant to give children fun and enjoyment. It is our duty to ensure we take good care when producing them and comply with the law and the safety guidelines.

Some useful websites are given below which you might wish to refer to before embarking on making toys for either sale or distribution to third party users (please ensure you refer to the latest legislation and advise).

[How to produce and label toys for children to comply with safety and warning regulations](#)

[C E Marking](#)

[Playing safe. A consumer's guide to the British Standard for toy safety \(BS EN 71 series\)](#)






[Hand Made & Home Made Toys](#) – Conformance also offer a Self Certification pack

[Toys Safety Standards](#)

[Hobby Aid](#)

[BSI Education - You want to make a Toy](#)

Please find below some of the symbols you might come across on toys and their meaning.

Safety Symbol	Meaning
	Does not mean fireproof or flame proof. Components of the toy are made of flame retardant materials
	A <i>self declaration</i> toys must have on them by law. It indicates the toy meets the European Toy Safety Standards. <i>This is not a safety symbol</i> and does not necessarily indicate quality and safety for the consumer
	British Standards Institute Kitemark. This indicates the toy has been <i>independently tested</i> and complies with BS EN 71.
	A principle of Lion Mark scheme is that toys are appropriately marked for use by children of a particular age. This label means that the toy is unsuitable for children under three years of age because it might, for instance, contain small parts or might cause choking or suffocation.
	A voluntary symbol (Lion Mark) developed by the British Toy and Hobby Association (BTHA) and can only be used by members of BTHA as a symbol of toy safety and quality adhering to strict advertising and counterfeiting ethics.