

HASLIN

Non-conformance and Corrective Action

SEQ-PR-065

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1. Scope

This procedure describes the processes for ensuring action(s) required for the rectification of any non-conformance, whether it relates to safety, environment, quality or other aspects of management. The procedure covers the following aspects of non-conformance and corrective action management:

- Sources of non-conformance and corrective action
- Issuing NCR/CAR Form
- Assessment of corrective action
- Implementation of corrective action
- Review of the adequacy and effectiveness of corrective action
- Corrective action records

2. Application

This procedure is applicable to all Haslin employees and sub-contractors. Although this procedure is primarily intended to be used for managing safety, environmental and quality related corrective actions, it can be used for managing corrective actions related to other aspects of business.

3. References

ISO 9001: 2015 Section 10.2

ISO 45001:2015 Section 10.2

4. Definitions

Corrective Action – short term action to resolve problem

Preventive Action – to prevent a problem from reoccurring

5. Legal responsibilities

NIL

6. Procedure

6.1. Sources of Non-conformance and Corrective Action

A non-conformance may arise from any of the following sources:

- Customer review or complaint
- Community complaint
- Non-conforming work or goods
- Workplace WHS consultation
- Site inspection
- Internal audit
- External audit
- Incident investigation
- Risk assessment
- Review of SEQ Management System

The person(s) identifying a non-conformance must ensure that the non-conformance is an outcome of a genuine failure to comply with a regulatory, customer or Haslin requirement.

Nonconforming product should be clearly labelled as non-conforming or separated until corrective action is agreed.

Uncontrolled when printed



A non-conforming product that has the potential for the health safety of site personnel or an impact on the environment must be quarantined in a safe and environmental manner to be disposed of in accordance to a local registered waste facility. (Refer to SEQ-PR-024 Waste Management)

6.2. Issuing NCR/CAR Form

Once a non-conformance is identified, it should be documented in a NCR/CAR Form (SEQ-FM-003) as clearly and specifically as practicable. Where practicable, a corrective action should be identified in consultation with the relevant work group and workplace health and safety committee. While identifying a corrective action consideration must be given to the following hierarchy of risk control:

- Elimination
- Substitution
- Engineering control
- Administrative control
- Personal protective equipment.

Person(s) identifying or issuing a corrective action must also consider the following:

- Cost implications
- Risk reduction capability of the recommended corrective action
- Potential impact of the recommended corrective action on Haslin's SEQ Management System or associated policies and procedures

A NCR/CAR Form should be issued by the person who identified the non-conformance or deficiency. The person issuing NCR/CAR Forms must ensure that:

- A NCR/CAR Form is completed for each corrective action and forwarded to the person responsible for implementing the corrective action(s)
- A copy of the each NCR/CAR Form is forwarded to Haslin's HSEQ Manager for entering records on Haslin's Central SEQ Database
- The recommended timeframe for implementing the corrective action(s) is either agreed with the person responsible for implementing the corrective action(s) or is practically reasonable
- Records of the NCR/CAR Form(s) issued are maintained for follow-up.

6.3. Assessment of Corrective Actions

Where a recommended corrective action is likely to involve one or more of the following, the corrective action must be forwarded to the HSEQ Manager for a review and endorsement prior to implementing or issuing it to the person responsible for implementing the corrective action:

- The cost of the corrective action is \$10,000 or more
- The corrective action may not reduce the risk to 'as low as reasonably practicable' level
- The corrective action may require amendment of Haslin's SEQ policies, procedures or management system.

The HSEQ Manager shall assess such corrective actions, where required discuss with the Managing Directors, and advise as soon as practicable whether any changes to the recommended corrective action(s) are required or not.

6.4. Implementation of Corrective Actions

Upon receipt of a NCR/CAR Form the person responsible for implementing the corrective action shall ensure that:

- The corrective action is included in the local NCR/CAR Register
- The justification of the NCR/CAR Form is assessed
- The timeframe for implementing the corrective action is mutually agreed with the person who issued the NCR/CAR Form
- The corrective action is implemented within the agreed timeframe, preferably in consultation with the affected work group members
- Failure to implement a corrective action within agreed timeframe for any genuine reason is notified to the person who issued the NCR/CAR Form and the Manager Safety, Environment and Quality
- The register has a **status column open or closed** and should be populated to indicate progress, or items closed



6.5. Review of the Adequacy and Effectiveness of Corrective Actions

The person responsible for implementing a corrective action shall ensure that the adequacy and effectiveness of the implemented corrective action is reviewed by a competent person. After completion of this review the relevant NCR/CAR Form should be completed, signed off and forwarded to the Manager Safety, Environment and Quality.

6.6. Corrective Action Records

Each Haslin workplace and worksite must maintain a NCR/CAR Register in accordance with SEQ-TP-009. The Register should be up-to-date with current status of each corrective action included in it.

Haslin's Corporate Office in Sutherland shall maintain central records of all safety, environment and quality related NCR/CAR Forms.

6.7. Preventive Action

Based on the root cause investigation preventive Action required to eliminate potential causes of nonconforming product may not be applicable in all cases. However in cases where the preventive action is determined will consider: Changes to System Procedures, Work Instructions, Quality Plans, and Supplier removal, changing the activity to eliminate, installing barriers/alarms/engineered solutions to minimise or isolate the risk. Where applicable, the person responsible for preventive action is to list the action taken to correct the situation. Consultation of the NCR will be conducted where applicable to all stakeholders.

6.8. Upon delivery to Customer

In situations where the nonconforming material has been identified upon delivery, its status will be reviewed. Decisions on the disposition of nonconforming materials and/or products will be made by Project Manager with the client. Project Manager may seek additional guidance from Manager Safety, Environment and Quality to determine final disposition.

7. Training

NIL

8. Relevant Templates, Forms and Checklists

SEQ-FM-003 NCR/CAR Form

SEQ-TP-009 NCR/CAR Register