

## 1.0 Purpose

The purpose of this procedure is to ensure that processes are in place to identify and control non-conforming services, products, materials, equipment, procedures, and unintentional events that do not conform to the specified requirements of IMS Integrated Management System or customer requirements.

Corrective and preventive actions shall be put in place to prevent a similar recurrence.

This procedure applies to all activities and controls required to maintain the on-going quality performance of IMS.

## 2.0 Responsibility

The Heads of Departments are responsible for ensuring that non-conformances are identified, and effective corrective and preventive actions are implemented in accordance with the documented procedures.

## 3.0 Definitions

### **Incident:**

An incident is an undesired event that could or does result in financial loss. Incidents include accidents, non-conformities, damages and near misses.

### **Near Miss:**

An unplanned event that did not result in accident, injury, illness, or damage, but had the potential to do so.

### **Non-Conformance:**

A non-conformance is defined as being a non-fulfillment of a specified requirement which is outlined in the Integrated Management System documentation, and/or Customer complaints.

### **Major Non-Conformity:**

Major Non-Conformity is an identifiable finding where a total absence of a required system element or function is observed, or where a system is in place, but a significant number of non-conformities are present within it.

### **Observation:**

This is not treated as a “non-conformity” but is a comment on the IMS for reference and guidance only. It will be issued on a non-conformity form to assist in the development and continuous improvement of the IMS Management System.

### **Concessions:**

NCPL does not design or develop any products and services under Section 8.3 and therefore concessions are not required.

## **4.0 Procedures**

All NCPL personnel are responsible for identifying and reporting non-conformities and incidents including personal injury, fatalities etc. The appropriate Heads of Departments are responsible for monitoring areas under their responsibility, and to identify and control non-conformities in accordance with the procedures that follow:

- Identify the non-conformity.
- React in a timely manner, and as appropriate take action to control and correct it, and deal with the consequences, including mitigating adverse environmental impacts.
- Review the non-conformity and determine the cause.
- Determine if similar non-conformities exist or could potentially occur.
- Implement any actions needed.
- The Procedure for Corrective and Preventive Actions shall be followed as required.
- Make changes to the IMS if necessary.
- The appropriate incident report form shall be used whenever possible and practicable.

- The Heads of Departments are responsible for ensuring that quality related problems and Customer complaints are resolved, and for allocating a serial number to each incident report.
- The Heads of Departments will keep the Chief Executive Officer informed of major Non-Conformance and associated proposed corrective and preventive actions.
- An Incident Report shall:
  - Identify and record non-conformances.
  - Record the root cause analysis – statistics.
  - Evaluate that corrective actions are sufficient to prevent recurrences.
- In cases where a delivered service is non-conforming by failure to meet customer requirements; but the delivered service can still be utilized by the customer, the appropriate Heads of Departments shall obtain a written agreement from the customer to seek approval for use of such services.
- Terms are agreed and documented between the appropriate Head of Departments and the customer and then shall be approved by the CEO. Non-conforming services may also be reworked to meet the specified customer requirements.

## **5.0 Non-Conformance & Incident Reviews**

Monthly reviews and analysis of Non-conformances, incidents and associated Corrective Actions as needed shall be made by the Heads of Departments to identify trends. These are discussed during Management Reviews /BSR.

The responsibility for ensuring the follow-up to verify the effectiveness of the corrective action or preventive action lies with the Heads of Departments.

Reviews of Non-conformances and incidents may take into consideration the following:

- Actions taken for each recorded non-conformance.
- Investigating the root cause of a non-conformance.
- Identification of trends and appropriate measure to prevent.

- Evaluation and determination of actions to be taken to eliminate the cause of non-conformances.
- Control of nonconforming product to prevent unintended use.
- Applying controls to ensure that corrective actions are taken and are effective.
- Taking action to mitigate any environmental impact caused.
- Analyzing all procedures, practices, records, audit results, and customer complaints of non-conformances.
- Implementing and recording changes in procedures resulting from corrective and preventive actions: and
- Target date for implementation of identified corrective action(s) or preventive action(s).
- Records of the review shall be kept.

## **6.0 Records**

- Incidents Reports.
- Incidents Log.
- Monthly Meeting Review Records.