1. Introduction

This procedure describes the process of identifying and evaluating non-conformities and the associated corrective actions in order to aid the continual improvement of our business and to prevent recurrence.

2. Scope

This procedure ensures that non-conformities are identified, recorded, and analysed in a consistent way to ensure that patterns and trends are identified.

The non-conformities could be from internal and external audits or inspections (via paper copies or through CSN), management review, non-conforming products or supplier issues. And where appropriate root cause analysis and corrective action is undertaken. The monitoring of corrective actions will enable performance to be evaluated and provide improvement opportunities.

Corrective action may include revision of working practices and procedures, evaluation of suppliers or replacement of plant and equipment.

3. Responsibilities

All NY Highways employees are able to raise appropriate non-conformances via the CSN Audit App, NCR Report. Non-Conformances can also be raised as a result of IMS Team Audits or a Directors Safety Tour.

The **IMS team** are responsible for assigning an identifying number if not raised in CSN App. to the NCR and ensuring that it is logged on the NCR Spreadsheet.

They will then communicate and discuss the NCR with the recipient and agree and log actions and a close out timescale.
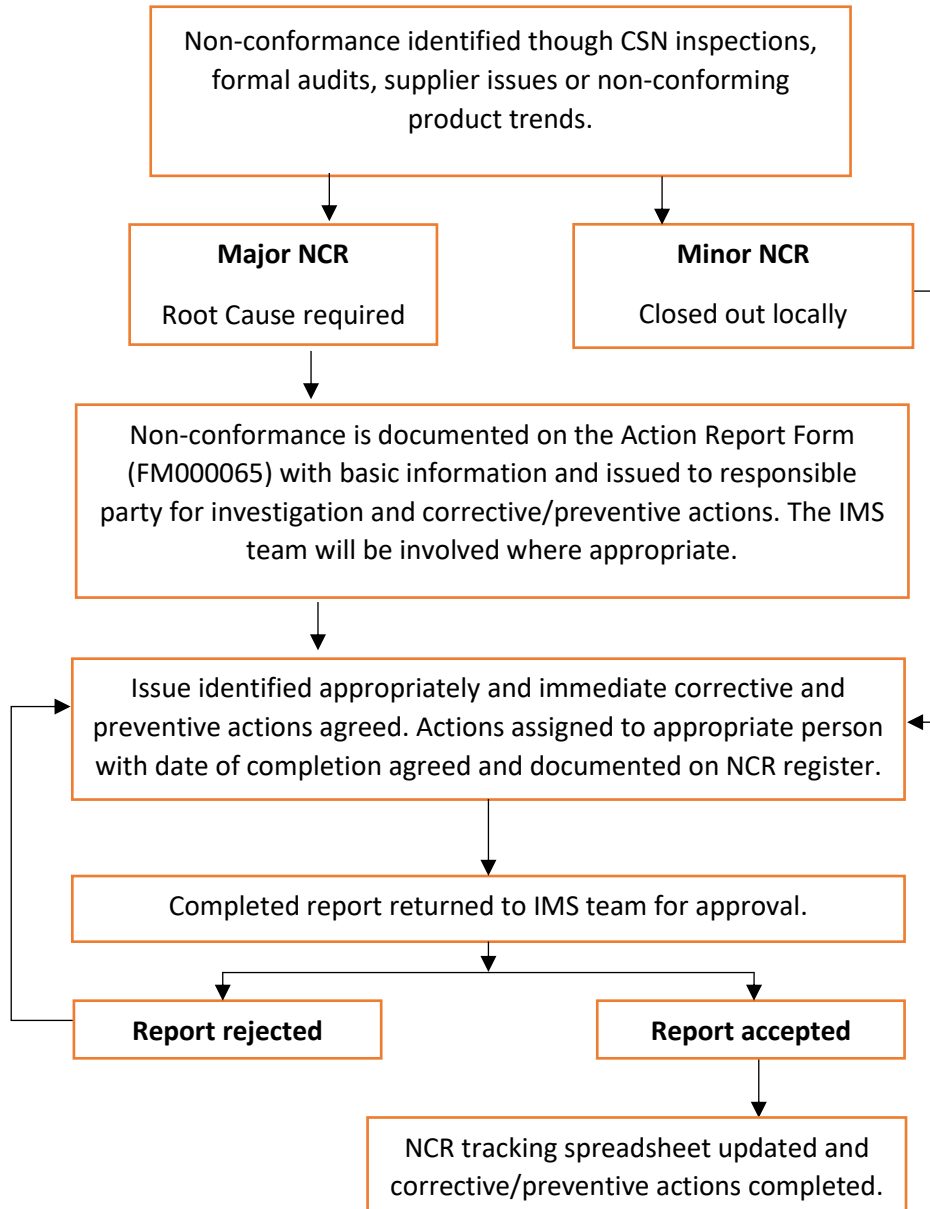
They will monitor the effectiveness of this process through audit and NCR review and raise any concerns with the Senior Management Team.

Attendees of the Weekly Safety Meeting will assign each NCR as "Major" or "Minor" Minor NCRs will be closed out by the local team, and an Action Report Form generated for "Major" NCRs. Where a number of "Minor" NCR are recorded against a similar issue or supplier it may be decided to treat this as a "Major" NCR and follow the Action Report Form route.

All Managers are responsible for ensuring that the root cause is determined (majors only), corrective and preventative action is implemented.

4. Procedure

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┌─────────────────────────────────────────┐
│ Non-conformance identified though CSN    │
│ inspections, formal audits, supplier     │
│ issues or non-conforming product trends. │
└─────────────────────────────────────────┘
        │                         │
        ▼                         ▼
┌──────────────────┐    ┌──────────────────┐
│    Major NCR     │    │    Minor NCR     │
│ Root Cause       │    │ Closed out       │
│ required         │    │ locally          │
└──────────────────┘    └──────────────────┘
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Major NCR — Root Cause required

Minor NCR — Closed out locally

Non-conformance is documented on the Action Report Form (FM000065) with basic information and issued to responsible party for investigation and corrective/preventive actions. The IMS team will be involved where appropriate.

Issue identified appropriately and immediate corrective and preventive actions agreed. Actions assigned to appropriate person with date of completion agreed and documented on NCR register.

Completed report returned to IMS team for approval.

Report rejected

Report accepted

NCR tracking spreadsheet updated and corrective/preventive actions completed.

Definitions

Conformity – the fulfilment of a requirement.

Non-conformity – the non-fulfilment of a requirement.

Minor Non-conformities, possible examples:

- Single minor events and small errors that can be easily corrected
- One unauthorized document alteration
- One missing document e.g. Waste document

Major Non-conformities, possible examples:

- Multiple and/or reckless violations
- Many unauthorised alterations to documents
- Multiple missing or unsigned documents
- Problems that negatively affect operations and processes

Analysis

A summary of the numbers (major and minor) and trends of NCRs will be reported at every management review meeting.

The Senior Management Team will be involved and informed about the issues raised. Where required issues will be discussed at the Monthly SLT meeting.

Informal reviews of NCRs may also take place.

Records

- Non-conformance reports
- NCR Register
- Action Reports
- Audit Reports
- Actions Register

Review

This document will be reviewed biennially or if changes to the process or responsibilities occur or following significant and relevant changes in UK legislation. Related information is on the Comms Hub.