Incident investigation, Non-conformity, Corrective and Preventive actions

IMS-IP-P-09 | Revision No. 0 | Dated. 01-08-2011

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1.0 Purpose

The purpose is to define a procedure and responsibilities for reporting, investigating and recording IMS Incidents and other IMS non-conformities. The procedure also aims to define corrective and preventive actions taken on IMS related nonconformities.

2.0 Process Owner

MR is the process owner of this procedure. He is responsible to:

- Ensure effective implementation of this procedure.
- Ensure that the procedure remains updated and available to all concerned

3.0 Responsibility for Reporting Incidents, Accidents and

Near Misses.

- It is the responsibility of the employee who experiences an incident, accident or near miss to report the occurrence.
- Department Heads are to ensure that all incident, accident or near miss occurring in their Department is reported.
- Anyone who only observed / witnessed an incident, accident or near miss should also report the occurrence.
- Hiding or not reporting an incident, accident or near miss is a serious non conformance, which
 must be looked into and conditions created where employees are encouraged to report incidents
 and not hide them.

5.0 Method of Reporting (All Incidents, Accidents and Near Misses)

Incidents, Accidents and Near misses are reported in any of the following manner:

- a. Filling form IMS-IP-F-07 (Pink slip) and submitting it to Departmental Head or MR.
- b. Filling IMS-IP-F-07 and sending it by e mail to Department Head or MR.
- c. Contractor's employees / visitors can also Fill form IMS-IP-F-22 (Pink slip) and submit the same to Departmental Head or MR.
- d. Any employee who cannot file the form in writing can report the incident, accident or near miss, verbally to his Supervisor who will fill and submit the form on his behalf.
- e. IMS-IP-F-07 may also be raised for any Environmental hazards identified during walk around audits.

6.0 Investigation & Corrective Actions on Incident, Accident and

Near Miss

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- a. In every incident the incident scene must be secured (cordon off the area) in order to carry out the investigation.
- b. Department head himself or his nominated person/team investigates the reported Hazard or near miss.
- c. In every incident involving injury to personnel (above first aid case), fire or equipment damage beyond rupees 0.5 million, the participation of Safety department representative in the investigation team is obligatory. In all such cases the Safety Manager/MR shall be informed immediately.
- d. The individual/s carrying out the incident investigation use IMS-IP-F-08 to record the findings.
- e. For every incident, accident and near miss, both immediate and root cause must be identified and addressed.
- f. The Investigation, root cause and corrective actions required must be identified within five working days of raising NCR/Incident Report.
- g. Corrective actions shall ensure that the cause of the nonconformity is eliminated and that it does not re-occur.
- h. After completion of corrective actions, the IMS-1P-F-07 and IMS-IP-F-08 are sent to MR.
- i. MR or his designated person reviews the effectiveness and adequacy of actions taken and closes out the investigation if found satisfactory.
- j. MR or his designated person requests for further actions if the corrective actions taken are not effective.
- k. MR or his designated person communicates and shares the event and its findings with all departments for information as well as taking any actions / checks at their end.

7.0 Log of Incidents, Accidents, Near miss

- Each Departmental Head/coordinator maintains incidents record, accidents and near misses of his/her Department on IMS-IP-F-10.
- MR views all logs and follows up if an investigation is delayed without due reason.
- MR uses this log for overall performance, trends and weaknesses of IMS system.

8.0 Non-conformances and Corrective actions

- A non conformance is any non-fulfillment, error, deviation or non-compliance to a specified IMS requirement of a standard, manual, procedure or SOP.
- When IP team identifies a missing IMS control (that was already identified as an existing control in the risk assessment register.)
- When any employee reports a hazard that on investigation is found to be a hazard because of a missing IMS control (that was already identified as an existing control in the risk assessment register.)
- An IMS nonconformance identified during an internal IMS audit
- Any employee may raise (Pink Slip) to describe a non-conformity observed. Such cases are investigated and recorded on IMS-IP-F-08. Procedure for handling pink slip described above.
- Non-conformance reports raised during IMS audits are written and investigated on IMS-IP-F-09
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- Corrective actions shall ensure that root cause is investigated and the cause of the nonconformity is eliminated and that it does not re-occur.
- Auditor / MR or his designated person follows up to verify effectiveness of corrective actions and closes out the NCR
- Corrective actions are taken without undue delay.

9.0 Corrective Actions on Non-Conformances raised during Internal IMS Audits

- Auditor raises NCR on IMS-IP-F-09 and hands over to Department Head or his nominee.
- Department Head/his nominee investigate the root cause of NCR.
- Department Head/nominee corrects the problem and takes corrective actions to eliminate the cause of non-conformance. (So that the problem does not reoccur).
- Auditor / MR or his designated person follows up to verify effectiveness of corrective actions and closes out the NCR
- MR or his designated person maintains a record of all audit NCRs.

10.0 IMS Preventive Actions

These are actions taken before an accident has actually occurred. These actions involve all personnel and managers to pro-actively look out for potential sources of errors, potential hazards and potential violations. Preventive actions therefore need conscious effort at identifying potential problems. This could be done in many ways.

- a. Any employee observing any sources of errors, potential hazards and potential violations. These may be reported on Pink slip
- b. Through discussions / suggestions/ concerns exchanged during IMS meetings.
- c. Based on incident trends or any other performance trends
- d. Through feedback from any interested parties.
- e. Potential non-conformances are also raised on IMS-IP-F-09 and kept as a record by MR or his designated person.

11.0 Records

Record No	Record Name	Maintained by	Retention Period
IMS-1P-F-07	Pink Slip	MR	2 years
IMS-IP-F-08	Investigation and corrective actions for Hazards and Incidents	MR	2 years
IMS-IP-F-10	Log of Incidents, accidents and near miss	Dept Head/Dept Coordinator /MR	2 years
IMS-IP-F-09	Non-conformance report	MR	2 years

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