



Albemarle County Public Schools

Subject:

Nonconformance, Corrective and Preventive Action

Document No.: EMS-10	Issue Date: 5/23/2013	Expiration Date: 5/23/2014	Last Revised: 6/29/2009	Page: 1 of 3	Prepared By: LCS	Approved By: JPL, JT, JD, GS
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1.0 PURPOSE

The purpose of this procedure is to establish and outline the process for identifying, and documenting EMS nonconformances, and for implementing corrective and preventive actions to mitigate their environmental impacts and prevent their recurrence.

2.0 SCOPE

This procedure applies to nonconformances and corrective and preventive action activities associated with Albemarle County Public School Division’s EMS.

3.0 DEFINITIONS

nonconformance - non-fulfillment of an EMS system procedure (such as this one).

Nonconformances are typically identified during internal EMS audits and are classified into two categories: major and minor. **Major nonconformances** reflect a complete breakdown or absence of following an EMS system procedure; a number of minor nonconformances against the same EMS procedure; or a minor nonconformance from a previous audit that has not been addressed. **Minor nonconformances** reflect that a given component of an EMS written procedure is not being implemented according to the procedure.

corrective action - action to eliminate the cause of a detected nonconformance. It is generally a reactive process used to address problems after they have occurred and been identified.

Corrective actions may be triggered by a variety of events, including:

- EMS audits;
- EMS Management Reviews;
- Monitoring and measurement results;
- Communication with regulators;
- Complaints (internal or external); or
- Deficiencies from compliance audits.

deficiency - a finding that appears to represent an incomplete requirement relating to an environmental aspect, and triggers the need for a corrective action.

observations – an observed weakness of the EMS and an opportunity for improvement – usually identified during an EMS audit.

preventive action - action to eliminate the cause of a potential nonconformance. It is generally a proactive process intended to prevent potential problems before they occur or become more severe. Preventive action focuses on identifying negative trends and addressing them before they become significant. Events that might trigger a preventive action include:

- monitoring and measurement results;



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- trends analysis;
- objectives and targets status;
- response to emergencies and close calls; or
- anticipated changes in laws or regulations.

4.0 RESPONSIBILITY AND AUTHORITY

4.1 EMS Steering Committee

- Review the status of any existing/identified nonconformances and corrective and preventive actions as part of EMS Management Review (see EMS-09, Management Review)

4.2 Environmental Compliance Manager (ECM), or designee

- Track and record all identified nonconformances in Nonconformance Log, EMS-10-R-01
- Coordinate corrective and preventive actions related to nonconformances
- Communicate nonconformances to EMS Steering Committee during Management Review process

5.0 REQUIREMENTS AND PROCEDURES

5.1 Nonconformances, corrective/preventive actions, and observations are logged and tracked by the ECM using the Nonconformance Log. The log includes the following required information:

- The source of or circumstance under which the nonconformance was identified (e.g., EMS audit, compliance assessment, individual observation);
- The type of citation (nonconformance, corrective action, observation) and its classification (major, minor, or simply observation);
- A summary of the finding and a description of the issue;
- A notation of whether a timely resolution occurred;
- A description of the suspected cause and a recommended solution;
- A timeframe expected for the resolution to be implemented;
- An update as to whether/when the nonconformance has been addressed

5.2 The ECM evaluates any identified nonconformances and the need for corrective or preventive action(s).



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- 5.3 Once the corrective/preventive action(s) have been completed, the ECM will log the investigation/correction details into the Nonconformance Log.

NOTE: Corrective and prevention actions can be initiated without an associated nonconformance.