



Instructions and Guidelines

Control of Nonconformity
Continual Improvement & Corrective/Preventative Actions
Container and Cargo Examination Facilities (CEFs)
September 2010

**This Instruction & Guideline refers to Practice Statement No:
PS2009/22 – Inspection and Examination of Sea Cargo**

Published date:	1 March 2011
Availability:	Internal and External
Subject:	Control of Nonconformity
Purpose:	Sets out the procedures for identifying and reporting of nonconformities at CEFs
Owner:	National Director Cargo
Category:	Operational
Contact:	National ISO coordinator, Sea Cargo Improvement

The electronic version published on the intranet is the current Instruction and Guideline

Summary of main points

- Sources and Reporting of Nonconformities at CEFs
- Control of Nonconformities
- Continual Improvement & Corrective and Preventative Actions

This Instruction and Guideline applies to staff in:

- Container Examination Facilities in Brisbane, Fremantle, Melbourne and Sydney
- Cargo Examination Facilities in Adelaide, Darwin, Launceston, Newcastle, Townsville

The Quality Management system is applied in Cargo Examination facilities in Launceston, Newcastle, Townsville and Darwin although these sites are not required to be certified.

Introduction

This Guideline should be read in conjunction with the Practice Statement 2009/22. This Instruction and Guideline describes the sources and types of incidents and breakdowns that constitute nonconformity at CEF, its recording and reporting arrangements.

Instructions and Guidelines

SOURCES AND REPORTING OF NONCONFORMITY

Under the ISO 9001:2008 Standard (the Standard), the Quality Management System (QMS) must develop strategies that enable the identification of any instances of nonconformity within the CEF.

Incidents of nonconformity may be brought to the attention of CEF staff by any of the following methods:

- Key Performance Indicators (KPIs);
- Stakeholder feedback;
- Involvement in an incident/near incident;
- Result of audit activity;
- Staff ideas/suggestions.

Given the complexity of the CEF inspection process, a number of potential sources of nonconformity have been identified

Equipment Breakdowns/Deficiencies

Incidents of CEF equipment breakdowns or service deficiencies (e.g. Contractors) that have an impact on CEF operation and its ability to meet throughput targets, should be reported to a Team Leader/ Supervisor who will inform the appropriate Competency Assessment and Training Officer (CATO). Technology and Enforcement Capability Section will be contacted, if required.

NOTE: To improve the effectiveness and efficiency of processes as well as to provide data for analysis and improvement activities, where practical, all other general issues/incidents/equipment failures that occurs in the normal course of work and subsequent actions should be recorded in the relevant CEF recording/reporting mechanism (for example, CEF Incidents/Issues Register, *Attachment A*) and reported to RMRM for further actions.

Radiation Safety Incidents

A Radiation Safety Officer (RSO) has been contracted to provide expert advice and support in radiological matters. In addition to the RSO, a CEF officer has been trained to act as the Radiation Safety Awareness Officer (RSAO) to provide on-site training and guidance to CEF staff.

Any incidents should be reported immediately to the RSAO or a Team Leader/Supervisor. The CEF Manager, in consultation with the RSAO and/or the RSO, will ultimately determine the danger/threat posed by any radiation incident.

Further information on radiation safety incidents and how they are to be handled are outlined in the CEF's *Radiation Safety Management Plan*.

Environmental Incidents

Environmental incidents include any event that has the potential to impact on the quality of the environment and are discussed in detail in the CEF's *Environment Management Plan*. An incident would include any unplanned release of chemicals into the air, sewers, storm-water drains or soil.

Environmental incidents are to be reported through Team Leaders/Supervisor or directly to the CEF Manager.

Occupational Health & Safety (OH&S) Incidents

All accidents, mishaps, dangers or near incidents must be reported as soon as is practicable.

Reporting should be made to the Regional OH&S Coordinator (ROHSC) through Team Leaders/Supervisors and in accordance with the *Customs and Border Protection Incident Reporting Checklist*. All OH&S incident reports are to be completed through the HRIS system which can be accessed via the Customs and Border Protection desktop. If an event is to be referred to Comcare, it must be done by a Supervisor or Manager using the *Comcare Notifiable Incident Form*.

Customs Incident Reporting Centre (CIRC)

Any incidents that arise during an examination that have the capacity to interrupt or affect Customs business, including security incidents, must be reported to the Customs Incident Reporting Centre (CIRC) on telephone **1800 303 387**.

Employee Assistance Provider (EAP)

If required, the Customs Employee Assistance Provider (EAP), OSA Group, is available to work with staff involved in a critical incident. Trained counsellors can be deployed to a workplace within 2 hours.

The OSA Group's contact number is **1300 361 008**, 24 hours – 7 days.

Further details on OH&S incident reporting can be obtained from the on-site OH&S Coordinator or through the Customs and Border Protection Intranet.

Security Incidents

Examples of a security incident include:

- Alarm activation/trespass;
- Robbery/break & enter;
- Compromised/unauthorized use of IT password;
- Incorrect disposal of Information;
- IT virus attack;
- Loss/theft of Customs and Border Protection property/ID pass;
- Nuisance callers/bomb threat;
- Fire/arson;
- Security containers not locked;
- Suspicious activity;
- Threat/harassment.

This list is not exhaustive. Reference should be made to the *Customs and Border Protection Security Manual* and associated documents and policies for further information.

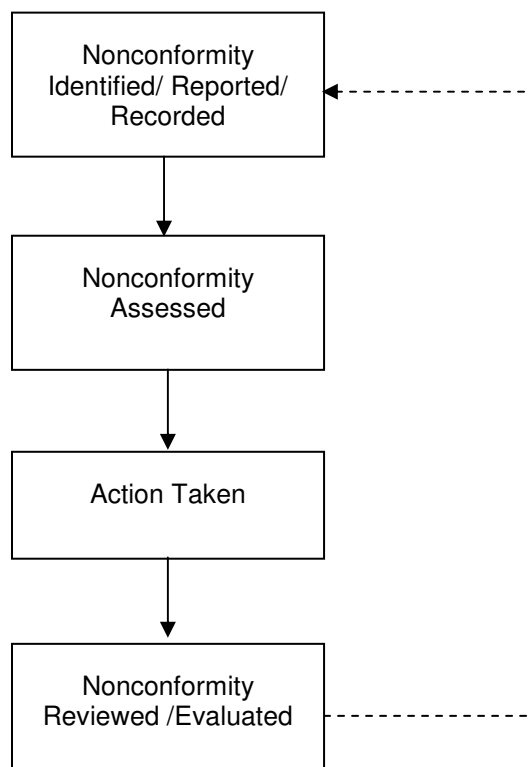
Any security incident is to be reported to the Regional Security Advisor, via a CEF Supervisor/Manager, as a matter of high priority. All security incidents are to be reported on a *Security Incident Report* form.

CONTROL OF NONCONFORMITY

It is a requirement of the QMS that records of nonconformities and any subsequent actions taken shall be maintained.

It is the responsibility of the CEF ISO Coordinator to monitor the handling of nonconformities and ensure the matter is brought to an acceptable resolution.

For the purposes of the *Control of Nonconformity* procedure, the following process flow is in operation:



Nonconformity Identified/Reported/Recorded

To prevent unsafe practices and inaccurate or incomplete results in our inspection and examination roles, the CEF QMS seeks to ensure that any part of the process, which does not conform to procedural requirements, is identified and reported.

Nonconformities are to be recorded in the relevant CEF recording/reporting mechanism (for example, CEF Corrective/Preventative Actions Report, *Attachment B*).

Any nonconformity should be reported as soon as possible and steps taken to rectify or minimise the adverse effects

NOTE: Some types of nonconformity have a specialised reporting process (See the “Sources and Reporting of Nonconformity” section),

Nonconformity Assessed

It is a requirement of the QMS that all nonconformities to be assessed. The size, nature and the associated risks of nonconformity will determine the actions that need to be taken.

Action Taken

All records about decisions made and action taken to correct the identified nonconformity must be retained, all parties involved must be notified.

Nonconformity Reviewed and Evaluated

When nonconformity is corrected, confirmation, based on objective evidence should be provided to ensure that the nonconformity was rectified.

CONTINUAL IMPROVEMENT & CORRECTIVE/PREVENTATIVE ACTIONS

In an atmosphere of continuous improvement, CEF staff are encouraged to be vigilant throughout the various processes in order to identify potential problems or faults before or as they occur and make recommendations for improvements or remedial actions.

Staff are encouraged to make any suggestions for improvement to CEF processes. These can be registered with Team Leaders/Case Officers, or the CEF ISO Coordinator who can raise the issues during Regional Management Review Meeting (RMRMs).

The need to corrective action can arise when an internal or external nonconformity occurs. Examples of sources on information for corrective action consideration include:

- key performance indicators (KPIs);
- customer complaints
- nonconformity reports
- result of audit activity
- outputs from RMRM and TMM
- outputs from data analysis
- stakeholder feedback'
- staff ideas/suggestions.

All instances of Corrective/Preventative actions and subsequent outcomes are to be recorded in the relevant CEF recording/reporting mechanism. (for example, Corrective/Preventative Action Report, *Attachment B*).

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When a need for corrective/preventative actions is identified, strategies must be implemented to eliminate the cause of nonconformity, provide corrective or preventative action to remedy the problem and prevent reoccurrence. Analysis of the causes may suggest some solution. There can be more than one cause for nonconformity or potential nonconformity.

Corrective Action

Corrective action must ensure that the nonconformity does not occur again. When corrective action is taken it should be recorded and followed up within a reasonable period to find out whether it has worked. The nature of the problem will determine the actions that need to be taken.

Preventative Action

Where a potential problem is identified, a course of action must be developed and put in place to reduce or eliminate the risk of the problem.

CEF recording/reporting arrangements will record the nature of the action taken.

Corrective/Preventative Actions Review and Evaluation

Following the implementation of a course of action, the nominated officer is responsible for monitoring the outcome of the corrective/preventative action. Monitoring of the action may take the form of:

- Liaising with staff/stakeholders;
- Direct Observation;
- Scheduling audit activity;
- Examining changes in Customs and Border Protection Records.

It is the responsibility of the nominated Action Officer to report back to the next convenient RMRM to provide an update on the evaluation of the implemented strategy. The Action Officer should also be vigilant for any unanticipated outcomes.

While some types of incidents have a specialised review process (See the “Sources and Reporting of Nonconformity” section), review of any nonconformity, including cause analysis will generally occur through the CEF’s RMRMs. A separate Agenda Item is included in all RMRMs for the discussion of any initiated corrective/preventative actions. If further action is required, an Action Officer is to be nominated to implement the process. The timeframe for the implementation of the action should be observed.

For further information on the requirements of the RMRM process, refer to the Instruction and Guideline “Managing the Quality Management System”.

Related Policies and References

Practice Statements:

- Inspection and Examination of Sea Cargo

Other Instructions & Guidelines

- Managing the Quality Management System
- Performance Measures and Clients

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- Document Control and record Management
- Auditing and Monitoring
- Purchasing and Supplier Evaluation
- Complaints Handling Procedures

Key Roles and Responsibilities

National ISO Coordinator, Sea Cargo Improvement, Canberra
 CEF Managers

Copies of this document are controlled. Master copies of the document are on the Intranet. National ISO coordinator is responsible for version control.

Consultation

Internal

The following internal stakeholders have been consulted in the development of these Instructions and Guidelines.

- ISO Coordinators
- CEF Managers
- Sea Cargo Improvement

External

Not required

Approval

Approved on	(date)	(signature)
By	National Director Cargo	
Review Period	This National Guideline is to be formally reviewed biennially by Sea Cargo Improvement Section	

CEF ISSUES/INCIDENTS/FAULTS REGISTER

ATTACHMENT A

Issue/Incident/Fault

- Equipment
- Suppliers
- Security/Staffing/IT/Property
- Documents/Records
- Business Improvement suggestion
- Other

Source

- Staff
- Result of Client Feedback
- Result of Incident
- Other

REPORTING OFFICER	DATE	TIME
ISSUE/INCIDENT/FAULT		
ACTION		

MANAGER/SUPERVISOR/ ISO COORDINATOR:	DATE:	TIME
/...../...../...../.....
ACTION COMPLETE:	YES/NO	
MANAGER/SUPERVISOR ISO COORDINATOR:	DATE:	TIME
...../...../...../...../.....

REVIEWING & EVALUATION OF ACTION TAKEN		
ACTION REVIEWED:	YES/NO	FURTHER ACTION REQUIRED YES/NO
MANAGER/SUPERVISOR ISO COORDINATOR:	DATE:	REVIEW DATE:
...../...../...../...../.....

Nonconformity

- Equipment
- Suppliers
- Security/Staffing/IT/Property
- Documents/Records
- Business Improvement suggestion
- Other

Nonconformity Source

- Result of Internal Audit
- Result of External Audit
- Result of Client Feedback
- Result of Incident
- Other

Corrective Action <input type="checkbox"/>		Preventative Action <input type="checkbox"/>	
REPORTING OFFICER	DATE	TIME	
NONCONFORMITY			
IMMEDIATE ACTION			

NONCONFORMITY CAUSE ANALYSIS CORRECTIVE/PREVENTATIVE ACTION TAKEN			
MANAGER/SUPERVISOR/ ISO COORDINATOR:	DATE:	TIME	
/...../...../...../.....	
ACTION COMPLETE:	YES/NO		
MANAGER/SUPERVISOR ISO COORDINATOR:	DATE:	TIME	
...../...../...../...../.....	

REVIEWING OF EFFECTIVENS OF CORRECTIVE/PREVENTATIVE ACTON			
ACTION EVALUATED:	YES/NO	FURTHER ACTION REQUIRED YES/NO	
MANAGER/SUPERVISOR ISO COORDINATOR:	DATE:	REVIEW DATE:	
...../...../...../...../.....	