



CORPORATE PROCEDURE

CHECKING AND CORRECTIVE ACTION

1 Aims of the procedure

1.1 The aim of this Corporate Procedure is to outline what measures are in place to ensure that breaches of health and safety are reviewed and corrective action taken so as to minimise reoccurrence. These measures shall be both qualitative and quantitative in approach and be appropriate to the needs of Neath Port Talbot County Borough Council (NPTCBC).

2 Responsibilities

2.1 Corporate Directors

Corporate Directors are responsible for enforcing this Corporate Procedure and where necessary following the status of the non-conformity. In addition they are to ensure that persons under their control shall investigate and follow through any corrective actions raised within their sphere of control.

2.2 Heads of Service

Heads of Service shall comply with this procedure in as much as ensuring that non-conformities and observations are identified, investigated and any issues resolved.

2.3 Governing Bodies of Schools Maintained by Education Authority

There is a shared overall responsibility for health, safety and welfare between the LEA, governing body and Headteacher.

2.4 Managers/ Headteachers

Managers/ Headteachers are responsible for ensuring the implementation of this Corporate Procedure within their workplaces to comply with management guidance.

2.5 The Corporate Health and Safety Manager

The Corporate Health and Safety Manager shall follow the relevant sections within this procedure and in particular ensure that the internal OHSAS 18001 audits are undertaken.

3 Nonconformities

3.1 For the purpose of this procedure and to meet the requirements of OHSAS 18001 the term of non-conformity will relate to:

“Any deviation from work standards, practices, procedures, regulations, management system performance etc. that could directly or indirectly lead to injury or illness, property damage, damage to the workplace environment or a combination of these”.

4 Recording and Reviewing Non-conformities

4.1 NPTCBC shall maintain where appropriate individual documents or electronic data bases to record details of non-conformities so as to allow for a periodic review by senior management in each Directorate.

4.2 The recording of non-conformities shall include Site Safety Inspections ([CF/07/01](#)), Accident / Incident report forms ([CF/09/01](#)) and results of internal and external audits ([CF/01/01](#)).

4.3 A copy of these forms shall be retained in the non-conformance register database until they are reviewed and actioned, then they shall be archived as appropriate in accordance with corporate procedure [CP/13/01](#) records and records management.

4.4 Review non-conformities, for particular patterns or data trends and report and document them at the senior managers team meetings.

5 Non-conformity Review and Corrective Action

5.1 The person who holds the Non-conformance Record File must: -

- review it, at frequent intervals, to see how to deal with the nonconformities that are reported.
- carry out the most appropriate corrective action that suits the urgency of the situation.
- where required arrange a visit to determine the extent of the problem and to authorise suitable corrective action.

- report to the risk and insurance manager as soon as possible when an incident, accident or other non-conformity may incur actual or probable financial cost, litigation or bad press as a result of negligence or inappropriate advice. In these instances, do not admit liability, settle, make or promise any payment / rectification of the problem until advised to do so by the above person.
- carry out in a way that is appropriate to the magnitude of the problem and the risk encountered all necessary corrective and/or preventative action relating to health and safety matters, that may arise from accidents, inspection and/or testing, or from the review meeting,

5.2 When the corrective action has been satisfactorily completed; the person holding the Non-conformance Record File must note the action that was taken then sign-off the item in the file.

6 Corporate Health and Safety Group Meetings

6.1 The corporate health and safety group shall meet quarterly and will usually be chaired by the Corporate Health and Safety Manager. The group are made up of the corporate health and safety officers employed by NPTCBC and shall, if required to do so, undertake part of that meeting.

6.2 The health and safety group will review the H&S Policy annually and will make recommendations for improvements in process and systems and will report such recommendations for amendment to the Corporate Directors group meeting through the Corporate Health and Safety Manager.

6.3 Each attendee at the meeting will record any action points that require their attention. They will attend to these points with the urgency agreed, before the next meeting. Each individual will keep their copy of their action points, indicating the action they have taken.

7 Management Review

7.1 The Senior Management Team Review for each Directorate, will be chaired by the relevant Corporate Director, and will normally be held at intervals of not more than one month. The Corporate Director and the various Heads of Service associated with that Directorate will attend this meeting. Where necessary, other members of the management team may be co-opted to assist in the review.

7.2 The meeting will set, review and where appropriate, suggest amendments to the corporate health and safety management system, objectives and supporting documentation. It will identify the standard to be achieved and how this will be done. Where such amendments have taken place it shall be the

responsibility of the Directorates to notify its employees, stakeholders and other interested parties.

7.3 The Senior Management Team meeting will also consider as a minimum the following: -

- the actions taken as a result of the previous meeting;
- the Directorates health, safety and training performance against its objectives and how these may be developed;
- any new or changed legislation and/or standards that are relevant;
- any long term employee absence from work;
- the performance of suppliers and/or sub-contractors ;
- non-conformity trends;
- the results of internal & external audits;
- any corrective action that is required as a result of the meeting.

7.4 Each attendee at the meeting will record any action points that require their attention. They will attend to these points with the urgency agreed, before the next meeting. Each individual will keep their copy of their action points, indicating the action they have taken.