	ENVIRONMENTAL, OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM PROCEDURE	Doc. No. : EOHSP-13
	INCIDENTS INVESTIGATION, NON-CONFORMITY, CORRECTIVE ACTION AND PREVENTIVE ACTION	Rev. No. : 00
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1.0 PURPOSE:

To establish, implement and maintain a procedure for:-

- ❖ Handling and Investigating the Non-Conformances.
- ❖ Taking actions to mitigate any Impacts/Risks caused and initiating, completing Corrective action & Preventive Action.
- ❖ Defining responsibility and authority for handling and investigating non-conformances.

2.0 SCOPE:

It encompasses all the Activities, Processes Products & Services covered under EOHS Management System.

3.0 RESPONSIBILITY:

Dept. Heads concerned are responsible for Monitoring, Investigating Non-Conformance and taking Corrective & Preventive actions in their particular area.

4.0 DEFINITIONS: Nil


5.0 PROCEDURE :

5.1 The non-conformance shall be identified as -

- Deviations from the documented procedure / instructions not followed.
- Unsafe practices / unsafe conditions.
- Accidental emissions / discharges.
- Deviation from the norms / specified limits.
- Spillage / Leakage / Emission / Accident / Incident due to improper handling / improper maintenance / deviation from operational control procedures and documented procedures.
- Any incident / accident having a significant impact / risk on the environment, or health or safety of persons.
- Non compliance to applicable legal requirements
- Improper handling of hazardous materials / waste
- Deviation from following the specified OCP's /ERP
- Deviation from the specification mentioned in the operation control procedure

5.2 Respective Team Members shall identify, record non-conformances, incidents and shall take appropriate actions through investigation & analysis.

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Date	02.04.2012	02.04.2012	02.04.2012

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5.3 Respective Team Members shall identify non-conformances; incidents periodically in the Environmental Incident Register (EOHS-RG-05) and Incidents such as Near Misses/ Accidents are recorded in Incident report (EOHS-F-08) accordingly and shall inform the concerned Dept Head to take appropriate actions.

5.4 Concerned HOD / his designated officer shall review / investigate the non-conformances, incidents and decide about the action to be initiated to mitigate immediate impact.

5.5 Initiating corrective and preventive actions as detailed in the subsequent steps shall control the non-conformance identified.

5.6 Respective Dept Heads shall investigate the non-conformance by involving concerned workers / employees and details of investigation are analysed & recorded.

5.7 The Procedure for Corrective & Preventive Action is designed to ensure that appropriate Corrective & Preventive Actions are initiated based on the inputs from the following as appropriate:

- Identified Non-Conformance, incidents
- Internal / External EOHS Audit Results.
- Emergency situations

5.8 The concerned Dept Heads shall analyse the cause of the Non-Conformance and decide the Corrective & Preventive action required to eliminate the cause of actual and potential Non-Conformities.


5.9 The steps involved in initiating Corrective Action shall be -

- ❖ Investigate the cause of Non-Conformance
- ❖ Recording results of investigation
- ❖ Determination of Corrective Actions needed to eliminate the cause of Non-Conformance.
- ❖ Ensure that the Corrective Actions are effective.

5.10 The Steps involved in Preventive action shall be -

- ❖ Analyse all Processes to eliminate potential causes of Non-Conformances
- ❖ Initiate Preventive Actions
- ❖ Ensure that the Preventive Actions are effective.

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5.11 The corrective and Preventive actions shall be taken appropriate to the magnitude of the problem and commensurate with the Environmental impact / OH&S risk encountered.

5.12 The respective Dept Heads along with the concerned worker / employee shall investigate the Non- Conformance.

5.13 EOHS MR / Dept HOD's shall verify the Corrective Action and shall also decide and update the change in any Operational Control Procedure / Work Instruction if necessary, as per the procedure for Document Control.

6.0 DOCUMENT / RECORD REFERENCE:

S.No.	Document /Record Description	Reference No.
1	Environmental Incident register	EOHS-RG-05
2	Incident report	EOHS-F-08
3	Work Permit	EOHS-F-09

7.0 ISO & OHSAS Ref

Clause ref 4.5.3 of ISO 14001:2004 & OHSAS 18001:2007

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