

# Corrective and Preventive Action

## Introduction

This document sets out work health and safety (WHS) guidelines for Participating Agencies (hereafter Agency/s) of the Across Government Facilities Management Arrangements (AGFMA) to develop and maintain a process for applying Corrective and Preventive Action (CAPA). Effective implementation of CAPA enables improvement of tasks and activities, and opportunity for rectification of issues or non-conformance associated with a task or activity.

The objective of implementing a process for CAPA is to:

- Eliminate non-conformities which are identified through inspection and audit programs
- Eliminate the cause/s of an identified non-conformance
- Enhance WHS outcomes for Agencies and Contracted Workers

## CAPA Process

CAPA processes have many and varied definitions and are often used interchangeably, however the nationally recognised terminology as it is referred to in Australian Standards is:

**Corrective Action** - action to eliminate the cause of a realised nonconformity and to prevent recurrence.

**Preventive Action** – action to eliminate the cause of a potential nonconformity, or other potential undesirable situation; and to prevent occurrence.

The analytical aspects of a CAPA process also align with the recognised Plan Do Check Act (PDCA) cycle depicted in Figure 1.



Figure 1 PDCA Cycle

## How to Identify a CAPA

Prior to initiating a corrective action, attempts should be made to correct the problem using routine measures such as a requirement of WHS legislation or a manufacturer's specification, etc. If these measures or controls are not successful, a more thought out corrective action may be required. A corrective action may be initiated as a result of:

- Hazard reports
- Incident investigation reports
- Workplace inspection or audit findings
- Inspection, testing, repair and maintenance reports
- Issues raised at WHS meetings, committee meetings or by Health and Safety Representatives
- Complaints
- Changes to procedures, processes, systems or documentation
- Legislative changes
- Adverse trends
- Management reviews
- Risk assessments

The preventive action process, comprises the implementation of controls to ensure that preventive measures continue to work. Preventive action means identifying not only potential problems, but also opportunities for improvement. With changes that are enacted through a preventive action process, controls should be included to prevent and check for possible nonconformities.

## Raising a Corrective or Preventive Action

Agencies should develop systems (procedures) for the documentation or recording of CAPAs, ideally using a **Corrective Action Report (CAR)** Form or appropriate software program; either of which should include the following as a minimum:

- A description of the issue identified
- Priority for action (high, medium, low)
- Responsibility for the action
- Suggested controls or actions
- Action taken to resolve the issue
- Sign off and close out of action.

An issue may be raised by any person including an Agency employee, contracted worker or visitor, however when completing a CAR, the person should consult with the Agency Representative of the Designated Location to ensure accuracy and proper completion. CAR's should be raised for any corrective or preventative action identified that cannot be closed out immediately, if not already documented on a form corresponding to the type of issue identified (e.g. hazard report, audit, incident investigation, etc.). For example, if a corrective action process is included in an Incident Investigation Report it may be unreasonable to raise a separate CAR.

Along with the defined process to identify corrective action, a predefined risk-based prioritization eliminates small nonconformities that Agencies can rectify when they identify an issue without initiating corrective procedures. Agencies may already have this criteria defined in their WHS Risk Management process e.g. matrices that include frequency (likelihood) e.g. highly likely, likely, unlikely etc. and impact (consequence) (minor injury, moderate injury, major injury etc.).

A CAR may also be raised by representatives of organisations which are external to the Agency. For example, if an Agency is audited by an external auditing body for WHS system conformance or certification, the auditing body may have an embedded CAR process. Notwithstanding, this information should be captured in the Agency's internal reporting system e.g. **Register**.

## Implementing a Corrective or Preventative Action

A completed CAR should be forwarded to the responsible Manager/Supervisor for action and close out in consultation with the worker who raised the issue and all other affected Workers. If this includes a Contracted Worker, consultation should also be undertaken with the relevant Facilities Management Service Provider. Managers/Team Leaders may also consult the Agency's WHS Representative, particularly in identifying and implementing controls.

## Registers

It is recommended that corrective actions recorded on a CAR be transferred onto a Register for ease of reporting to WHS Committees, Agency Focus Groups, monitoring and review meetings, etc. The Register supports activities which progress all CAPAs through a monitoring and close out phase, and is also beneficial for monitoring trends and effectiveness of control measures.

Typically, the Agency's WHS Manager is responsible for maintaining the Register of recorded corrective and preventative actions issued, including those documented on alternative forms such as hazard reports or incident investigation reports. The WHS Manager should also periodically review the Register and follow up on outstanding corrective and preventative actions as required.

## Summary of Roles and Responsibilities

Role	Responsibilities
Participating Agency Chief Executives	<ul style="list-style-type: none"> <li>Endorse the development and implementation of a CAPA process.</li> </ul>
Participating Agency Managers/Supervisors	<ul style="list-style-type: none"> <li>Participate in the CAPA process.</li> <li>Assign actions or implement actions.</li> <li>Manage CAR registers where required.</li> </ul>
Facilities Management Service Providers	<ul style="list-style-type: none"> <li>Participate, where relevant, in the processes outlined in this guide note.</li> </ul>
Contracted Workers	<ul style="list-style-type: none"> <li>Where an issue cannot be resolved immediately, notify the Agency representative.</li> <li>Participate, where relevant, in the processes outlined in this guide note.</li> <li>Implement any safety action recommended by the Agency for the Designated Location.</li> </ul>