

## **HS309 Corrective Action Procedure**

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Policy Hierarchy link		Work Health and Safety Act 2011 Work Health and Safety Regulation 2011 UNSW Work Health and Safety Policy			
Responsible Officer		Director, UNSW Safety and Sustainability			
Contact Officer		Manager, UNSW Health & Safety			
Superseded Documents		OHS309 Corrective Action Procedure v4.2			
File Number		2016/00369			
Associated Documents		HS329 Risk Management Procedure HS307 Hazard and Incident Reporting Procedure HS312 Inspection, Testing and Monitoring Procedure HS714 Supervisors guide for managing reported hazards and incidents			
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4.3	Director, UNSW Safety and Sustainability		24 February 2016	24 February 2016	

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# 1. Purpose and Scope

The purpose of the Corrective Action Procedure is to outline the process for ensuring that action required to fix deficiencies identified from any hazard identifying activity is documented and tracked until completed. Such hazard identifying activity includes inspections, testing, audits, as well as hazard and incident reporting.

This procedure applies to all workers, students, contractors and visitors at UNSW workplaces.

## 2. Definitions

**Corrective action:** Any action taken to eliminate or remedy an undesirable situation or condition.

**Hazard:** Hazard is a situation or thing that has the potential to cause harm to people, property or the environment.

**Hierarchy of risk control:** The ways of controlling risks ranked from the highest level of protection and reliability to the lowest.

**Incident:** A Health & Safety incident is any unplanned event which occurs in the course of UNSW work which could result in:

- · Work illnesses;
- Uncontrolled fire and explosion;
- Physical injuries;
- Equipment plant or property damage;
- Dangerous occurrences which could have, but did not injure any person;
- Exposure to hazardous substances or circumstances;
- Minor injuries;
- Any other incident that could put employees or plant at risk.

Reportable incidents are an event as listed in the Work Health and Safety Act that require reporting to the regulator WorkSafe NSW (refer to the UNSW Hazard and Incident reporting procedure). However all events that leads to an injury, illness or possible injury/illness must be reported to UNSW.

#### 3. Procedure

## 3.1 Identify corrective actions

Activities that identify corrective or preventative action opportunities include:

- Conducting workplace inspections
- Testing, inspecting, and monitoring of plant and equipment
- Consulting with workers, students and others
- Non conformances from HSMS internal audits
- Non conformances from self audit tool (SAT)
- Following up on hazard reporting and investigating the causes of incidents
- Addressing any non-conforming product prior to purchase and use
- Screening of contractors, service providers and labour hire employees
- Investigating H&S complaints
- Reviewing H&S system failures

When hazards, incidents and audits are recorded on the on-line reporting system the associated corrective actions are recorded electronically and a corrective action register can be generated from this information. Refer to HS714 for detailed guidance on how to use the online reporting system.

## 3.2 Implement corrective actions

Use the Hierarchy of Risk Controls (refer to the UNSW Risk Management Procedure) to identify the most appropriate action to be taken consistent with the level of risk.

Corrective actions must be discussed with people affected prior to implementation.

In situations where many corrective actions are identified at once (e.g. following a H&S workplace inspection), the corrective actions should be assigned a priority rating according to identified risk so that those posing the highest risk are addressed first.

There should be a record of corrective actions implemented e.g. on online reporting system, in meeting minutes etc.

## 3.3 Assign responsibility for carrying out corrective actions

Responsibility, authority and accountability for corrective actions are designated as follows:

- When assigning corrective actions, the competency of the person to whom the action is assigned must be taken into account. Advice should be sought from personnel with specific expertise as appropriate.
- Facilities Management is responsible for corrective action relating to building and grounds infrastructure.
- Facilities Management is responsible for corrective action relating to plant and equipment associated with building infrastructure and grounds.
- At UNSW Canberra, Defence Support Group is responsible for corrective actions relating to building and grounds infrastructure and all plant and equipment associated with building infrastructure and grounds.
- The Managers of Schools and Units are responsible for corrective action relating to plant, equipment, hazardous substances, dangerous goods, work procedures (including training), in their day-to-day operations
- Supervisors or nominated responsible persons are responsible for ensuring corrective actions from hazard and incident reports are completed.

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- Nominated responsible persons for corrective actions from workplace inspections are responsible for ensuring the corrective actions assigned to them are completed by the date recommended.
- The online system sends regular email reminders to responsible persons of corrective actions that require action.
- Corrective actions not completed in a timely manner shall be reported to the Head of School or work unit. The Head of School or unit will then contact the person(s) responsible for the corrective action to ensure completion.
- A report of the corrective actions shall be generated from the on-line reporting system and be monitored by local level 3 Health & Safety Consultation Committee
- Any corrective action that cannot be fixed by the local area needs to be escalated to the Faculty / Division (level 2 Health & Safety Committee) or the Level 1 Health & Safety Committee.

Worker / Auditor/ Online hazard Health & Safety Supervisor reporting system Committee (s) Inspector Hazard /Incident Email Decide on reported notification to corrective supervisor action **Implement** Record of corrective corrective action action Review corrective action Corrective **Close off** action status corrective report action **Review status** report

Figure 1. Process and responsibility for corrective action

## 3.4 Review and monitoring of corrective action

- Corrective actions are reviewed and monitored by school or unit H&S committee (Level 3) by monitoring the corrective action status report. All new hazards should be documented in the school or unit hazard and risk register.
- Faculty and Divisional H&S Committees (Level 2) review and monitor corrective actions beyond the scope of schools and units.
- The UNSW H&S Committee (Level 1) reviews and monitors corrective actions beyond the scope of faculties, schools, and units.
- Effectiveness of implemented corrective actions are assessed as being appropriate by re-inspections, audit follow-up, re-testing of plant and equipment, consulting with workers and reviewing UNSW hazard, incident and workers compensation statistics.

# 4. Review & History

This procedure shall be reviewed in accordance with the HSMS Review Procedure.

Versid	Authorised by	Approval	Effective	Sections
10.0.	riumonoou by	Date	Date	modified
1	Director, Risk Management Unit	April 2003	April 2003	New Document
2	Director, Risk Management Unit	May 2003	May 2003	Minor formatting
3	Director, Human Resources	June 2007	June 2007	Reference to UNSW OHS Risk Assessment and Control Procedure added
3.1	OHS Manager	22/6/2007	22/6/2007	Remove reference to OHS Governance Model and UNSW Register of Delegations
3.2	OHS Manager	30/7/08	30/7/08	Clarification of responsibility of supervisors in the changes to part (d) & addition of parts (e) & (f). Amendment to part (d) to include Faculty/Division and Corporate review of corrective actions. Amendment of part (c) to clarify who communicates the completion of corrective actions to the person who reported a nonconformance.
3.3	OHS Manager	28/7/2009	28/7/2009	Minor updating to all sections. No substantive changes.
4.0	Director, Human Resources	10/12/2010	10/12/2010	Section 3.3 changed to reflect process of new online reporting system
4.1	Director, Human Resources	18/01/2013	18/01/2013	Removed reference to old legislation. Updated flow chart. Referenced the SAT Updated Branding Logo in accordance with UNSW Branding Guidelines. Modified the document identifier from OHS to HS in accordance with WHS legislation review
4.2	Director, UNSW Safety and Sustainability	30 April 2014	30 April 2014	Reviewed for administrative updates
4.3	Director, UNSW Safety and Sustainability	24 February 2016	24 February 2016	Reviewed for administrative updates

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