



**Control of Corrective and Preventive Action
Reporting (CPAR)**

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1 Introduction

1.1 Scope

This procedure sets out Intelfort's controls for corrective and preventative actions to correct non-conformances and take advantage of opportunities to continually improve.

1.2 Terms and Definitions

- "Staff" and "users" means all of those who work under our control, including employees, contractors, interns etc.
- "We" and "our" refer to Intelfort Nigeria Limited
- The Intelfort "Integrated Management System Manager" is the manager responsible for the management systems under which the "non-conformity" has been reported.

1.3 Responsibilities

The System Manager is responsible for all aspects of the implementation and management of this procedure, unless noted otherwise.

1 Procedure

The CPAR system is used to address all of the following:

- Typical management system performance non-conformities
 - Failure to establish objectives and targets.
 - Failure to define responsibilities required by the management system, such as responsibilities for achieving objectives and targets.
 - Failure to periodically evaluate compliance with compliance obligations.
- Typical performance non-conformities:
 - Targets are not achieved.
 - Maintenance requirements are not performed as scheduled.
 - Permitted limits are not met.
- staff reports of problems or potential problems, be they with equipment, procedures, processes or infrastructure.

- Staff suggestions for improvement.
- Adverse trends associated with non-conformities.
- Internal and external audit findings
- Action items arising from management review.
- Any other reported problem or suggestion

All staff are empowered and encouraged to submit a corrective or preventive action request when they discover an existing or potential non-conformity against our requirements and procedures, our customer's requirements, or compliance obligations.

In addition, staff are encouraged to submit suggestions for improvement using the CPAR system.

2 CPAR Process

See above under "Definitions" to determine who the appropriate "System Manager" is for the management of a particular CPAR.

The CPAR system utilizes two forms:

- The **CPAR Form**, which is used by staff to request corrective action (addressing existing problems) or preventive action (addressing potential problems), or to submit suggestions for improvement.
- The **CPAR Log**, which is used to track CPARs and to provide trend data for subsequent management review.

The member of staff requesting action completes Part 1 of the CPAR Form and then submits it to the System Manager.

The System Manager assigns each CPAR to those staff who are best able to analyze and resolve the issue. Where a single member of staff is assigned the task that member of staff is referred to as the 'Assignee'. Where multiple staff are assigned, one of that group will be appointed 'team leader' and the team leader is referred to as the 'Assignee'.

The System Manager monitors progress and should further resources or other management action become required, will take any necessary actions.

Once the action plan has been determined, the Assignee implements the plan, updating the CPAR Form as the plan progresses.

Once the action is complete, and the Assignee considers that the issue has been resolved, the Assignee signs and dates the CPAR Form and returns it to the System Manager who updates the CPAR Log accordingly.

The System Manager identifies trends relating to non-conformances and reports on those trends at environmental management reviews.

Where such trends are identified, or the System Manager so decides, then the Corrective and Preventive Action Reporting (CPAR) system is used to investigate the root cause of the trend.

3 Verification

The System Manager performs independent verification of the actions taken, including giving consideration to the following:

- Has the action plan removed the root cause(s)?
- Has the action eliminated the original issue reported?
- Were any related documents updated as necessary?
- Was additional training identified and given if required?
- Does the internal audit schedule require amendment?
- Were all interested parties properly notified of the actions taken?

Where the System Manager determines the issue has not been satisfactorily addressed, the CPAR Form is re-assigned for further action.

2 Records

Records retained in support of this procedure are listed in the **Controlled Records Register** and controlled according to the **Control of Management System Records Procedure**.

