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History of document

Description of modifications	Release	Pages
This is the first edition of the document	1	7
Inserting paragraph dedicated to 4.4 OBSERVATIONS MANAGEMENT (OSS)	2	5
Insertion of reference to other methods of recording evidences	3	4, 5, 7
Insert of improvement plans, integration to root cause analysis process and escalation in treatment process	4	3, 4, 5
This is the first edition of the document	1	7



1. Scope

The following procedure establishes criteria of classification and the treatment of non-compliance and customer complaints are defined.

This procedure can be applied to all the products/ services of the organization.

2. References

CODE	DESCRIPTION
MAQ80	Measurement, analysis and improvement
PRO85	Corrective actions and Improvement Plans

3. Terms and definitions

Codes and acronyms used by organization are shown in MAQ30 section. They are also defined:

NC	Non conformity
RNC	Report of nonconformity
CA/ AC	Corrective action
CC/ RC	Customer complaint
oss	Observation

4. Management of nonconformities

Nonconformities for each process are defined in the respective procedures. The Report of nonconformity is handled according to the following paragraphs.

4.1. Classification of Nonconformities (NC)

The NCs concern the Integrated Management System and in particular:

- all the processes of the Integrated Management System,
- characteristics of quality of the product / service,
- integrity and efficiency of plants and equipment,
- safety and health of the workplace.



NCs are classified and managed according to the following table, which defines, for each type of NC, responsibilities dealing with root cause analysis and treatment, and defines escalation process to be activated on need:

Type of NC	A	В	С
Features of NC	SEVERE	LOW	OF SYSTEM
	NC makes the product / service unusable for the purpose for which it is intended	Slight differences between contract and supply requirements are highlighted	The NCs highlight the inadequacy or inefficiency of IMS procedures or work instructions
	There is a significant economic damage	There is not a significant economic damage	
Example	A delay of delivery causes a cancellation of the order by the Customer.	An incomplete supply causes a customer's complaint	No recordings are available as expected in the procedure
	An error in the development activity leads to remake the project.	An error in the development activity requie slight modifications	Assignement of responsability is not well defined
Compiling NC	Sales	Sales	QMR
(What happened)	Production or testing (responsible function)	Production or testing (responsible function)	
Correction (remedy)	Sales> QMR	Sales> QMR	QMR
(What to do right	Production or testing > QMR	Production or testing > QMR	
away)	(responsible function)	(responsible function)	
Corrective Action	Sales> QMR	Sales> QMR	QMR
(What to do to solve the problem definitively)	Production or testing > QMR (responsible function)	Production or testing > QMR (responsible function)	
Resp. Check AC execution	QMR as Responsible of the Group of Check	QMR as Responsible of the Group of Check	Responsible of the Group (different from QMR)

Note: The sign> indicates who decides if the previous one is unavailable.

In each case of being unable to effectively perform the NC compilation, who detects the NC should promptly communicate the event to his direct responsible, in order to start the treatment process.

NCs are annotated on MOD83 or other operational forms provided by the company (ticketing systems, 8D Report, EWS Report, MOD831) and QMR provides for progressive numbering of models.



4.2. Report of nonconformity (RNC)

The RNC reported on MOD83 is subdivided into 4 parts:

- first part: it describes the detected NC and it identify the author and the date of the detection;
- second part: it describes **the results of the analysis of NC root cause**, the measure taken to remedy the NC, who decided it and who did it and when;
- third part: it describes, when it is found that NCs are critical and / or repetitive and referring
 to results of analysis of NC root cause, the AC adopted to avoid NC repetition, who decides
 AC and the response to effectiveness AC;
- Customer Satisfaction Analysis (limited to Customer Complaints).

RNCs can be registered and specified in reports, drawings, tickets and other internal and external documents.

The ACs are kept under control by QMR.

4.3. Treatment of nonconformities (NC)

The treatment of NCs is the immediate measure to adopt in case of detection of NC, in accordance with responsibilities defined in §4.1. The treatment of NC can be:

- segregation and rejection if it is not possible to implement corrective treatments,
- acceptance under concession by the Customer. The concession of the Customer need to be confirmed and documented,
- remaking in order to correct the nonconformities or the nonconforming features,
- **substitution or integration** of an incomplete supply or requirement and so on.

4.4. Observations Management (OSS)

In the event that Observations are made as IMS-based surveys and defined as anomalies that have no impact on the management system at the moment, but which may, in time, degenerate into nonconformity and be kept under control (eg situation surveys indicating potential risk or danger, clarifications or notes to draw the attention of the Organization or auditor for future evaluations), the organization is required to register (MOD83), to analyze the causes, define any actions to resolve them and implement these actions.



5. Customer complaints

Detection of Customer Complaint (RC)

Complaints can be registered by every person in the organization on the RNC MOD83 form.

In the report could be added the following information:

- a written communication from the Customer (fax or letter)
- additional drawings and documents to explain the complaint,
- technical documents

Customer Complaints are always handled as severe NC.

5.1.1 Management of Complaints regarding SA8000

The internal and external interested parties may submit their complaints / suggestions concerning the topic covered by the SA8000 also to the SPT and / or the SA8000 Workers' Representative..

Employees can also submit complaints and suggestions anonymously

The SPT with periodic frequency:

- collects modules,
- verify the truthfulness of the complaint and the proposals for improvement,
- with the Workers' Representative for the SA8000, carries out a preliminary analysis of the causes that generate the complaint.

If necessary, they initiate a corrective action aimed to implement an improvement plan, indicating the liability and the timing of it. The QMR provides to the employee or to the external staff who has filed the complaint (if he or she has declared his / her identity) the communication of the ongoing improvement plan or the implementation of the remedial action to the problem ensuring that it will be managed within 30 days from reception. If the complaint does not have a "paternity" (anonymous complaint) SPT publishes the solution adopted by posting the ongoing improvement plan or the implementation of the remedial action to the raised issue.

Alerts, complaints or proposals of improvement can be addressed to SGS Italia Spa Certification Body:

- e-mail: sa8000@sgs.com (anonymous mailbox)

- e-mail: laura.ligi@sgs.com

- fax: 051 6389926

Alerts and complaints can be submit to SAI (Social Accountability International located in New York and it represents the entity issuing the Standard SA 8000) to the address SAI-SAAS — SOCIAL ACCOUNTABILITY INTERNATIONAL:

- 220 East 23rd Street, Suite 605, New York, New York 10010 USA
- fax (212) 684-1515
- Email saas@saasaccreditation.org



NB: We suggest to submit complaints and suggestions firstly to Microtest Srl.

If case of unresolved or unsatisfactory solution you can contact the SGS Certification Body directly. If also in this case the reply is not satisfactory we suggest to contact SAI.

5.1. Customer Satisfaction

The last section of MOD83 form includes a short questionnaire in order to monitor the Customer Satisfaction.

6. INDICATORS

Some indicators are listed below.

INDICATOR	MEASUREMENT	FREQUENCE
Type of NC and RC	Number of RNC for each class Number of RC for the object of the complaint	Six-monthly
Satisfaction of RC	In order to compute the answer assign 1,3,5 or 7	Six-monthly
Reaction time	hours / days employed to answer to a RC	Six-monthly

7. Records

Records are organized as follows:

TYPE OF DOCUMENT	RESPONSABILE OF RECORD	RETENTION OF RECORDS	TIME OF RETENTION
MOD83 – Nonconformity report / Customer complaint	Process Owner	QMR	3 years
MOD831 – Tester Board Nonconformity Material form	Process Owner	QMR	3 years