

# 5. Corrective Action Submission

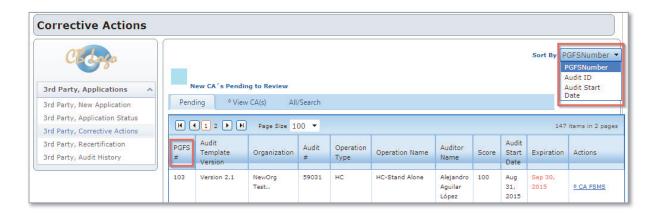
After the audit is scheduled for the auditor, the auditor will visit your operation(s) at the agreed date and submit preliminary audit reports to the PrimusGFS system within 15 days. The auditor will also report the non-conformance questions that are found during the auditing process. As the auditee/client, you will be able to view these non-conformance questions and submit corrective actions for these questions in the PrimusGFS system within 30 days from the audit start date. After you log in the PrimusGFS system, in the "3rd Party, Applications", click 3rd Party, Corrective Actions to access the corrective action section. The section offers you tools to view non-conformance questions, and to submit corrective actions.



"3rd Party, Corrective Actions" section shows all the audits with different status of corrective actions submission progress which is separated by three tabs: **Pending, View CA(s)** and **All/Search**.

- <u>Pending:</u> This tab lists the audits that are in need of submitting corrective actions or the
  audits that are not reviewed/closed by the CBs. You can submit corrective actions in this
  tab if the CAs phase has not expired.
- View CA(s): This tab lists the audits whose corrective actions have been reviewed and closed by the CB. You can only view the corrective action and responses from the CB, but cannot submit corrective actions in this tab.
- <u>All/Search:</u> This tab can offer the option to search all the audits with CA progress saved
  in the system. Different search criteria can be applied to make it an easier search. Based
  on the search results, you can either submit corrective actions or view the corrective
  actions and responses.

Audits can be organized using the list displayed in the upper right corner <u>"Sort by"</u>, or by clicking the column header for better data management.



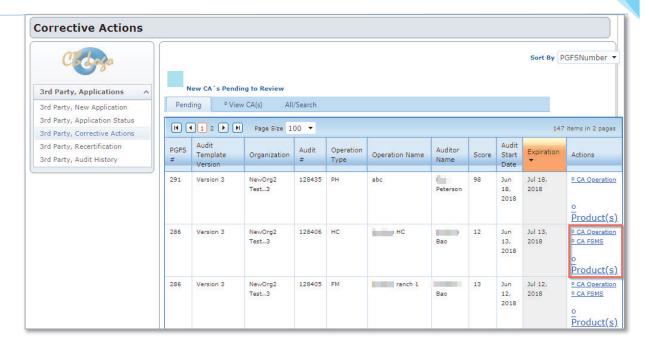
The tabs in the corrective action module share some common columns. They are:

- PGFS #: PrimusGFS registration number assigned to the audit.
- Audit Template Version: The PrimusGFS Version.
- Organization: Organization details including; organization name, location and contact(s).
- Audit #: The audit identification number that is assigned to this audit.
- Operation Type: The operation module that the audit is conducted.
- Operation Name: Names of operations to be audited.
- Auditor Name: The auditor who performed the audit.
- Score: The audit score at the current progress.
- Audit Start Date: The first date when the audit was performed.
- **Expiration:** The date when the CA phase has expired; the auditee cannot submit CAs after this date. This is not available in the "View CA(s)" tab.
- Actions: Displays the links of actions that can be done under the tab. The actions can be different in different tabs. There are:
  - CA FSMS: The link to submit corrective action(s) in Food Safety Management System (FSMS) module.
  - **CA Operations**: The link to submit corrective action(s) for operation modules: GAP/GMP.
  - Product(s): Displays the product(s) of the audit. This is not editable.
  - View CA(s): The link to view all the submitted CA(s) and the responses from the CBs.

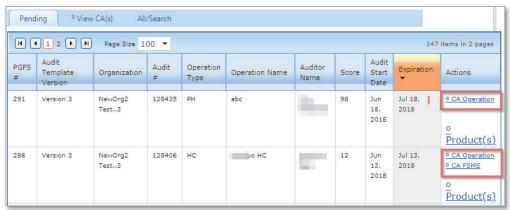
# 5.1 **Submit the Corrective Actions**

The user can view and submit corrective actions for all modules under the "Pending" tab. The tab is default while clicking **3**<sup>rd</sup> **Party, Corrective actions**. The user should see the corrective action phase expiration date in the "Expiration" column, set to thirty (30) calendar days after the audit date.

- If the CA phase is not expired (the expiration date is in black color), the user can go ahead and submit CAs.
- If the CA phase is already expired (the expiration date is in red color), the user has to contact with the CB first to extend or reopen the CA phase to submit CAs.



- a. To access to the "Corrective Actions" page:
  - i. Click **CA Operations** or **CA FSMS** to access to the corrective actions page.
    - **CA FSMS:** The link to submit corrective action(s) in Food Safety Management System (FSMS) module.
    - CA Operations: The link to submit corrective action(s) for operation modules: GAP/GMP.

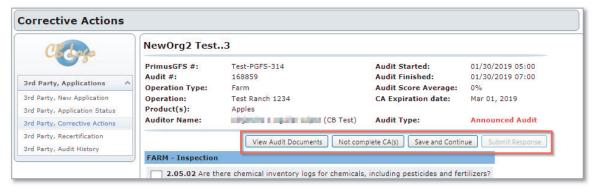


In the "Corrective Actions" page, the brief information of the audit is listed at the top which is not editable. There are four tabs below the audit information:

• <u>View Audit Documents:</u> By clicking the tab, the user can view the current audit documents (including preliminary report).



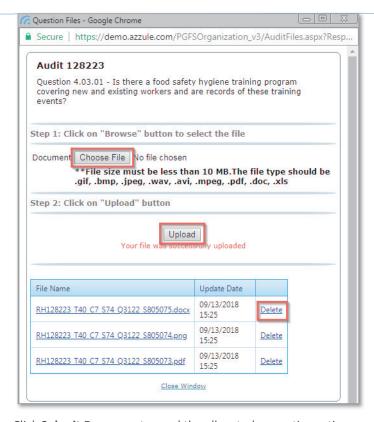
- Not complete CA(s): By clicking the tab, the user decides not to complete corrective actions for the non-conformance questions. There is a confirmation window for the user to confirm the activity after clicking the tab.
- <u>Save and Continue</u>: The tab that the user can use to save the corrective action responses and continue to work on the next questions. Please note that the corrective actions are not submitted to auditors/CBs by clicking this tab.
- <u>Submit Response</u>: The tab is initially grayed out unless the checkbox in front of the question is selected. With the selection of the question, the "Submit Response" button will turn from gray to black and be activated so that the user can click the tab to submit CAs of this question for auditor/CB to review.



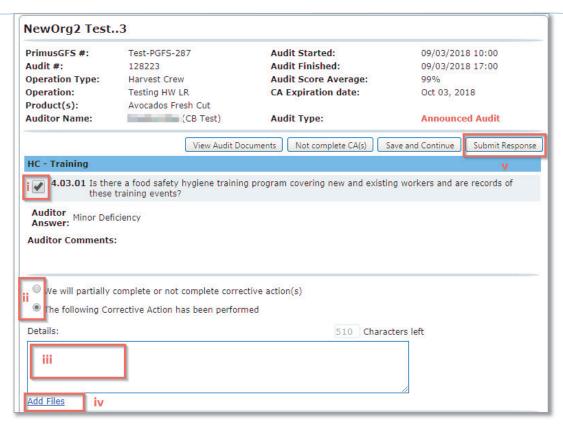
Below the tabs, all the questions where a non-conformance was raised are listed.

#### b. To submit corrective actions:

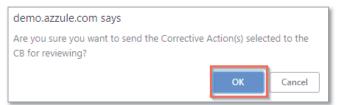
- i. Select the checkbox in front of the question you are submitting a corrective action for.
- ii. Select the option for possible response:
  - If the user is confident that the response will be sufficient to be corrective actions, the user can select "The following Corrective Action has been performed".
  - If the user does not have enough evidence as the corrective actions, the user can select "We will partially complete or not complete corrective action(s)".
- iii. Type any comments or explanations in the text box.
- iv. If needed, the user can attach files by clicking **Add Files**. In a pop-up window, the user can choose a file from own computer and click **Upload** to attach the file as part of the corrective actions. The user can upload multiple files for a question and can delete uploaded files. Close the window to return to the previous page.



v. Click **Submit Response** to send the allocated corrective action response(s) to the CB for review.



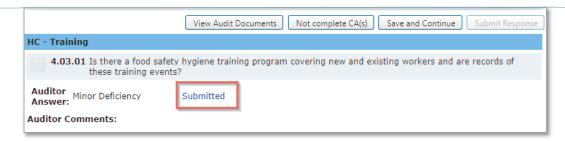
vi. Click **OK** to confirm the submission.



Note: A user can send one question's corrective action response or multiple questions' corrective action responses at one time. When deciding to send a corrective action response, the auditee user should check the box located in the top-left near the question number for each corrective action they wish to send.

Once a corrective action response is submitted to a CB for review, it can no longer be edited by the auditee user. The submitted question will be marked as **Submitted**.





### c. To not submit any corrective actions

If the user does not wish to complete <u>all or the rest of</u> the corrective actions, the user can click on **Not complete CA(s)** tab.



Click **OK** to confirm the activity, then the system will automatically submit the response to the CB/auditor. The questions will be marked as **Submitted**.

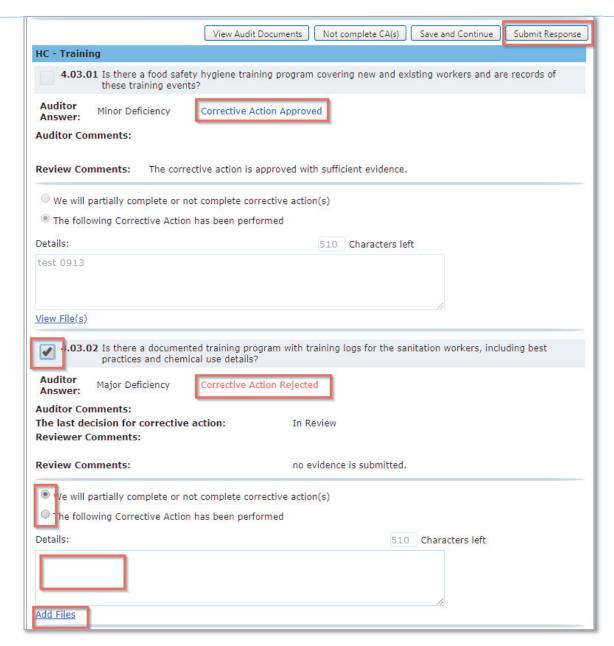


## d. Resubmit corrective actions after CB/Auditor's review

The auditee user should note that if the certification body or the auditor does not accept a corrective action response, the auditee does have another chance to respond to the non-conformance as long as the thirty (30) days since the audit date have not elapsed. Auditees are urged to respond to non-conformances correctly in their first response in order to give the CB ample time to properly review corrective action work.

- If the corrective action is approved, there is no need to submit more responses to that question.
- If the corrective action is rejected, the user can follow the same way as mentioned above to submit corrective actions for CB/auditor to review again.





Auditee users should be aware that CBs reserve the right to require that corrective actions be reviewed and verified by conducting on-site corrective action verification visits. This is especially the case if a large number of non-conformances are scored, an automatic failure is detected, a potentially high-risk food safety issue is detected, or an issue is detected that has historically been a concern with a particular process and/or product. CBs will communicate with auditees to book the corrective action follow-up visit, and if possible, will try to send the same auditor that conducted the audit.