

## **PP-D008**



## PAINTING CONTRACTOR CERTIFICATION PROGRAM BUSINESS MANAGEMENT SYSTEM CRITERIA

Editorial Note: This version of the document has clarified frequency of taking environmental measurements

#### 1. SCOPE

- a) This Document applies to organisations wishing to seek accreditation to the PCCP® scheme (the Scheme) that do not have an external third-party verified quality management system conforming to AS/NZS ISO 9001.
- This Document forms a sub-set of other PCCP Documents that detail full accreditation requirements eg PP-D013 for protective coatings; PP-D033 for pavement marking.
- c) It needs to be noted that PCCP is a trademark registered with IP Australia and is owned by CSIRO and is protected by law. Unauthorised use is prohibited.

#### 2. PURPOSE

- a) The objective of this document is to provide applicant contractors with information relating to what is required in the way of business management systems; Safety, Health, Regulatory, Environmental and Quality (SHREQ) as part of achieving PCCP accreditation.
- b) The implementation of any SHREQ system has the added benefit of improving the business by the establishment of formal business control processes.
- c) Although it is not mandatory for PCCP contractor organisations to hold external accreditation against eg AS/NZS ISO 9001, they are required to conform to certain minimum criteria in order to ensure customer confidence and consistent high quality, accurate services.
- d) This document defines a scaled-down version of SHREQ systems suitable for PCCP applicant organisations and acceptable to the Scheme.
- e) Applicants need to take particular note of Notes 1 & 2 in clause 7 below.

#### 3. **DEFINITIONS & ACRONYMS**

## 3.1 Terms

There are no terms requiring special definition.

## 3.2 Acronyms

BMS Business management systems

CSIRO Commonwealth Scientific and Industrial

Research Organisation

CVS CSIRO Verification Services

EMS Environmental management system

Key products and services

EO Executive Officer, PCCP
ITE Inspection and test equipment
ITP Inspection and test plans

PCCP Painting Contractor Certification Program

QMS Quality management system

SHREQ Safety, Health, Regulatory, Environmental and

Safety (management systems)

SMS Safety management system SWMS Safe Work Method Statement

## 4. AUTHORITIES & RESPONSIBILITIES

- The Manager, CVS is accountable for the adherence of CVS to these criteria and their equal application to all applicants
- The Executive Officer, PCCP (EO) is responsible for the implementation and promulgation of the process for Recognition.

#### 5. REFERENCED DOCUMENTS

The documents listed below are either referenced in this document or provide important and relevant additional information:

- a) PP-D001 How PCCP Operates
- b) PP-D012 PCCP Recognised Training Courses
- c) PP-T001 Technical Note Calibration of inspection and test equipment

The above documents may be accessed from the PCCP web site:

Painting Contractor Certification Program (csiro.au)

 d) AS/NZS ISO 9001: 2008 Quality management systems – Requirements.

available for purchase from the SAI-Global web site at: <a href="https://infostore.saiglobal.com/">https://infostore.saiglobal.com/</a>

## 6. BUSINESS MANAGEMENT SYSTEMS

## 6.1 General

- a) A business in control of all of its key compliance activities – Safety, Health, Regulatory, Environmental and Quality (SHREQ) – is more likely to be able to provide its customers with the confidence it is a professional, long-term partner.
- b) The SHREQ system shall be integrated into a unified single system that uses common elements such as corrective actions for all parts – Quality, OH&S and Environmental.
- c) The implemented SHREQ system complying with these requirements shall be applied to all business activities, not just those related to PCCP® services or processes.
- d) The SHREQ system shall be part of the daily business operations and shall be integrated into the normal daily activities.

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- e) The SHREQ system shall be constantly improved through analysis of activities and doing them in a better way.
- f) The organisation may outsource its SHREQ system activities (in both the developmental stage and the ongoing daily monitoring stage) to an external person or organisation. In such cases, the roles, responsibilities and limits to authority of the person or organisation shall be defined and documented.
- g) The document hierarchy will typically be, in descending order of importance;
  - i) <u>Policies</u> documents that describe W<u>hat</u> it is that the organisation is trying to achieve. These will be broad goals and objectives
  - ii) <u>Procedures</u> documents that provide details of the <u>Who</u> and <u>When</u> (responsibilities, accountabilities, and steps to be taken to ensure compliance). Procedures may also reference detailed Work Instructions.
  - iii) <u>Work Instructions</u> documents that describe <u>How</u> the organisation intends to go about achieving the policy, in step-by-step detail, and
  - iv) <u>Records</u> documents that provide evidence of activities undertaken.

## 6.2 Quality management systems (QMS)

- The Applicant shall be able to demonstrate its commitment to the provision of consistently high quality goods and service/s by having in place a working quality management system.
- b) The purpose of a quality management system is that it imposes a level of discipline and professionalism on the Applicant that will benefit not only the Applicant but also the client. This "discipline & professionalism" revolves mostly around documentation ("doing what we document and documenting what we do") and records (evidence of compliance).
- c) Option A is to implement and abide by the QMS described in this document (clause 7). This is an 'entry-level' induction into QMS. It contains the key elements required to run a professional competent coatings application business and it satisfies the PCCP accreditation requirements. It does not however, permit the contractor to claim any QMS compliance such as ISO 9001.
- d) Option B is to apply for and achieve a fully compliant ISO 9001 accreditation through an external JAS-ANZ accredited body such as SAI Global, NCSI or an approved equivalent. Depending on the applicant organisation's current situation, this may be a more lengthy and expensive process than Option A. However, it does allow the contractor to claim AS/NZS ISO 9001 compliance.

- e) Applicants choosing Option B shall undergo periodic shortened PCCP audits as many elements will already be covered by the ISO 9001 auditors. A copy of the external ISO 9001 audit report shall be inspected as part of the PCCP audit.
- f) A current certificate from the auditing body shall be provided as evidence of compliance.

#### 6.3 OH&S management systems (SMS)

- a) In a similar fashion to QMS, contractors may choose to achieve either external OH&S accreditation to an approved standard eg ISO 18001 or AS 4801 or internal accreditation via a PCCP developed alternative.
- SMS minimum requirements for PCCP accreditation are detailed in clause 8 below.

#### 6.4 Environmental management systems (EMS)

- a) In a similar fashion to QMS and SMS, contractors may choose to achieve either external accreditation to an approved standard eg ISO 14001 or internal accreditation via a PCCP developed alternative.
- EMS minimum requirements for PCCP accreditation are detailed in clause 9 below.

## 7. QMS REQUIREMENTS

**Note 1** – Applicants deemed to comply with the requirements for quality management systems detailed below <u>are not accredited against AS/NZS ISO 9001 and may not claim or imply such accreditation in any manner.</u>

Note 2 – The implementation and adherence to this QMS may with some additional application, eventually lead to a successful application for AS/NZS ISO 9001 accreditation.

#### 7.1 Control over Documentation

- a) Control over all documentation types detailed in 6.1e above is critical if an organisation is to be in control of its activities & outputs. Documenting what you do and doing what you document ensures consistency of actions, training and output.
- b) Documentation shall be appropriate to the scale, risk and complexity of the activity.

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#### 7.1.1 Policies

- a) The organisation shall document the policies that drive the organisation, and which comprise their QMS. Typically, these will be related to, but not necessarily limited to, Quality, OH&S, a Vision or Mission statement and an Environmental policy.
- b) Typically, the policies will be collated in a manual(s) e.g. Quality Manual or Business Control Manual.
- c) The policies shall be endorsed by the chief executive of the organisation, dated and regularly reviewed (typically annually) to ensure continued relevance.

## 7.1.2 Key Documents

- a) The organisation shall consider and identify documents that have a direct bearing or impact on the quality of the product or service the organisation provides to its clients. Such documents are called Key Documents.
- b) All corporate policies are Key Documents. Some activities, processes, procedures and practices are considered Key, and documentation related to them shall be considered Key Documents. Similarly, some forms recording Key Activities are considered Key Documents.
- c) Key Documents shall be Controlled version controlled for changes; distribution control; authorisation etc. The organisation shall be able to demonstrate that the correct versions of Key Documents are available at all points in the organisation where they are required to be used and that all previous versions are not able to be used.
- d) The organisation shall maintain a manual of Key Documents. The manual shall be appropriate to the size, risks and services provided to clients.
- Records shall be legible, securely stored and readily accessible as and when required.
- All records shall be traceable to specific job(s) and client. Traceability shall include identification of customer supplied test coupons or items.

#### 7.2 Management responsibility

- a) The organisation shall be able to demonstrate that top management is committed to, and aware of the QMS and its activities by records being available of regular reviews of elements of the system.
- The reviews by top management shall include results of audits, actions taken on non-conformances, customer feedback, complaint analysis etc.
- Top management shall follow up actions and maintain records of actions and reviews.

- d) Top management shall ensure QMS training is part of routine induction training and subsequent refresher training.
- Top management shall ensure that all employees are aware of, supportive of, and committed to, the QMS.

#### 7.3 Control over Personnel

- Top management shall provide the resources necessary to make the QMS work effectively for the organisation. These resources shall include human, equipment, training, skills and experience.
- b) Top management shall appoint a person to oversee the development and implementation and ongoing maintenance of the QMS. The roles, responsibilities and limits to authority of that person shall be defined and documented.
- c) Key personnel in the organisation shall have documented job descriptions detailing roles, responsibilities & limits to authority.
- d) The organisation shall document the organisational structure including reporting lines and job titles and names of incumbents. Care must be taken to ensure position titles in organisational charts, job descriptions and other documents are clear and unambiguous and use the same terminology.

## 7.4 Control over jobs

- a) The organisation shall document the procedure it goes through to accept or tender for jobs. The procedure shall include roles, responsibilities and limits to authority for staff.
- The procedure shall include an assessment of risks associated with taking on the job – financial, WHS&E, political etc.
- c) Risk minimisation activities shall be implemented where appropriate and risk acceptance shall be defined. Higher levels of risk may require higher levels of acceptance e.g. managing director.
- Records of risk consideration and approval need to be kept. (See Note 3 below for additional guidance)
- e) The organisation shall ensure that all job-related documentation including client specifications and test methods are available at the site of the work prior to commencement of work.
- f) The organisation shall ensure that skilled and experienced supervision is present during job execution so that the customer's desired level of quality is achieved on the job.
- g) The organisation shall ensure that operators with the required skills and experience to deliver the

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customer's desired level of quality are assigned to the job.

- h) Inspection and test plans (ITPs) shall be established for each job and shall identify stages of each job with Hold, Witness, Test points etc. identified as appropriate. Pass/fail criteria for each stage shall be identified including authorisation for proceeding.
- i) When undertaking Key processes such as abrasive blasting and painting, product application for Linemarking or Flooring the organisation shall verify environmental conditions are appropriate to the activity. Weather conditions shall be recorded; temperature, relative humidity and Dew Points shall be recorded every 3 hours. Approval for the activity to proceed shall be given according to established criteria and records kept.
- j) The organisation shall ensure that skilled, experienced and appropriately qualified personnel are available to carry out inspection and test activities as identified in the ITP as and when required. Accredited training courses for coating inspectors are identified in PCCP Document PP-D012 on the web site.
- Note 3: Risk minimisation activities should not just be limited to OH&S risks, an activity that is normally well covered due to legislative and regulatory pressures. Sometimes, job taken on involve unusual risks legal, financial, product etc. The majority of 'normal' risks are covered by existing documentation eg ITPs and SWMSs but sometimes risks associated with jobs involve unusual risks eg working under or over water, in confined spaces, on foreign soil etc. Someone with the requisite skills, knowledge and experience shall make an assessment whether there are any unusual risks and whether any existing documentation shall be changed to minimise these To minimise unnecessary paperwork, consideration should be given to only considering non-OH&S unusual risks for 'Significant' jobs. (OH&S risks of course need to be considered for all jobs).
- Note 4: Significant jobs could be defined by their size e.g. >\$500K; % annual turnover or they could be for a Significant client.

## 7.5 Control over Equipment

#### 7.5.1 General equipment

- a) The organisation shall have documented processes for ensuring that all equipment used on the job is serviced regularly and maintained so that the customer's desired level of quality can be achieved.
- Service intervals shall be defined and records of service kept.

#### 7.5.2 Inspection & test equipment (ITE)

- The organisation shall ensure that all measuring and test equipment used during the project or task;
  - i) Is appropriate for the test required
  - ii) Is stored and maintained in a manner which will not affect the results obtained
  - iii) Is where appropriate, calibrated by an authority approved for the purpose
- Guidance as to the need for ITE shall be obtained from the manufacturer's data sheet &/or technical representative.
- The extent of control over ITE shall be appropriate to the criticality of the surface preparation and coating application processes.
- d) Where processes are deemed critical and ITE needs to be used, the organisation shall ensure that personnel operating test equipment are trained, skilled and experienced in the use of the equipment and hold Coating Inspector qualifications – see also clause 7.5j above.
- e) The organisation shall ensure that calibration activities and processes are documented including intervals and acceptance criteria and that they comply with PCCP Document PP-T001.
- f) Records of calibration and training shall be kept.
- g) Where processes are deemed non-critical, the organisation shall decide on the level of testing and measuring to be undertaken and assess the associated risks to business thereof. Justification for such a decision shall be provided to PCCP. In such cases, acceptable alternatives to ITE may be;
  - Use of nearby Bureau of Meteorology (BOM) web sites to access current temperature and humidity data
  - ii) Use of operator skills and knowledge to assess whether or not application conditions are Marginal. Where application conditions are assessed by an experienced operator as clearly well within the acceptable range, measurements may be omitted.
  - iii) Both of the above.

## 7.6 Control over Purchasing

a) The organisation shall have a documented procedure for the identification and handling of Key Products and Services (KPS). KPS are products or services sourced externally that, if supplied in an "out of specification" manner, would impact directly on the quality of the service the organisation provides its customer. Examples of KPS are calibration services, reference standards etc.

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- b) The organisation shall establish and maintain a register of suppliers of KPSs including specifications. Periodic reviews of KPS performance against standards shall be undertaken. These reviews need not be detailed and can be as simple as 'did the supplier over the past 12 months deliver the right quantity, on time with no product faults or complaints?' – Yes/No. Records of the reviews shall be kept and will typically be a yes/no/date column in a spreadsheet.
- Consideration should also be given to documenting criteria necessary for certain KPSs e.g. calibration service providers may need to be NATA accredited for that activity.

#### 7.7 Control over Sub-contractors

- a) The organisation shall have a documented process for how it controls sub-contractors hired to provide Key Services e.g. abrasive blast or spray hands, coating inspectors and/or calibration service providers so that the customer's desired level of quality is achieved.
- b) The process shall include the delivery of training to the sub-contractor in the requirements of the company QMS, WHS&E systems, as & where appropriate.
- Records of the training shall be kept including a signoff acceptance and agreement to abide by company systems & rules.

## 7.8 Identification & traceability

- a) To ensure traceability through the entire job cycle/history, the organisation shall assign a unique identification code to each job and ensure that all documents and records generated are identified with this code.
- The organisation shall ensure that full traceability is ensured by recording full details of activities including;
  - i) batch numbers of paint used
  - ii) identification of test equipment used via e.g. serial numbers or other unique system.

## 7.9 Control over Training

- a) The organisation shall have in place a system for identifying current skills and training of its employees e.g. via a Skills Matrix spreadsheet or database that lists trade and other qualifications, tickets, skills, licenses etc.
- The organisation shall use the skills register to match client/job requirements and to identify training needs of its employees.

- Induction training shall include training in the QMS, its structure & purpose, its support by top management and the organisation's expectations for compliance by new employees.
- d) Induction training shall include a sign off by both trainee and trainer. Trainee sign off shall include a statement of understanding of, and an agreement to abide by, all elements of the training.
- e) The organisation shall use on-going training to reinforce previous training and organisational expectations.
- f) Records of training shall be kept.

## 7.10 Continuous system improvements

- The organisation shall ensure that the SHREQ is continuously improved by implementing each of the following;
  - i) <u>Internal audits</u> periodically reviews of activities shall be conducted by appropriate employee(s) independent of the area being audited to check on compliance with the requirements of this document and the QMS. Records of such audits shall be kept.
  - ii) <u>Non-conformances</u> where the system has been found to have failed, the organisation shall instigate an investigation to determine what corrective action is required to fix the system and prevent repeat occurrences. Records shall be kept.
  - iii) <u>Customer feedback</u> the organisation shall endeavour to obtain feedback from its customers on how it performed in meeting the customer expectations. Feedback shall include customer complaints. Records shall be kept.
- Capturing system failures should be broad enough to ensure all the following are considered and recorded;
  - i) Customer complaints
  - ii) Complaints from members of the public
  - iii) Internal suggestions for improvement
  - iv) Audit non-conformances, internal or external
  - v) On-the-job failure (e.g. poor quality job)
- c) Once the non-conformance has been rectified and the customer is happy (QuickFix), time can be spent analysing Why it went wrong and assigning a Cause Category e.g.
  - Process or document failure (operator followed the procedure exactly but it was incorrect)
  - ii) Plant or equipment failure
  - iii) Human error (requiring retraining)
- d) Management shall review outcomes of the above activities and implement action plans for improving the system. Effectiveness of the action plans shall be



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assessed and records kept of all improvement activities.

- e) This process of continuous improvement is the only means by which any return will be obtained on the investment made in developing the management systems. It is only by a rigorous process of analysis of data collected in NCRs that effective action can be implemented. Hence capturing non-conformances is important and should follow a 3-stage process;
  - Logging the NC in accordance with 7.11b) above and assigning a category
  - ii) Carrying out any 'QuickFix' to keep the customer happy
  - iii) Investigate the true Root Cause and assigning a Category (e.g. equipment failure; process or document failure; human error etc.) and a corrective action.
  - iv) Evaluation of the effectiveness of the corrective action – did it prevent the problem occurring again?
- f) Once sufficient data has been collected, meaningful analysis can take place by producing e.g. bar graphs of sources and root causes. Corrective actions can be arrived at by e.g. management review.

#### 8. SMS REQUIREMENTS

- a) All contractors have a duty of care to protect their employees, full time, part time or casual, subcontractors, visitors and the public in general from any adverse impacts arising from the Applicant's activities.
- In addition to 'common sense' obligations on the contractor, the Applicant also shall identify all legislative and regulatory obligations applicable to their range of activities and develop OH&S plans to comply.
- c) The Applicant may choose whether to implement a scaled-down system acceptable to PCCP or whether to apply for full ISO 18001 / AS 4801 accreditation.
- d) Applicants are required to have a policy defining how they intend to approach this responsibility and associated documented procedures including safe work method statements for all their activities.
- e) Key elements of the Compliance Plan for OH&S are;
  - i) Compliance with the requirements of the harmonised WHS Act (2011)
  - ii) Safe Work Methods Statements for all key
  - iii) PPE issue, training, maintenance plans
  - iv) Ongoing training in OH&S matters e.g. via toolbox talks

 Records of compliance with the SMS plan need to be kept.

#### 9. EMS REQUIREMENTS

- All contractors have a duty of care to protect the environment – air, soil, water, flora, fauna, cultural and heritage sites – from any adverse impacts arising from the Applicant's activities.
- b) In addition to 'common sense' obligations on the contractor, the Applicant also shall identify all legislative and regulatory obligations applicable to their range of activities and develop environmental plans to comply.
- The Applicant may choose whether to implement a scaled-down system acceptable to PCCP or whether to apply for full ISO 14001 accreditation.
- d) Applicants are required to have a policy defining how they intend to approach this responsibility and associated documented procedures for safeguarding the environment from all their activities.
- Key elements of the Environmental Compliance Plan are;
  - i) Environmental damage minimisation procedures e.g. spill control for paints, waste discharge minimisation, reducing use of resources, erosion control etc.
  - ii) Ongoing training in environmental protection matters e.g. via toolbox talks
- Records of compliance with the environmental plan need to be kept.