



Guidance for Nonconformity Reports (NCRs) Applicable to the Older Version of a Standard, but not the Newer Version of a Standard, During the Last Year of a Standard's Transition Period

When a standard is revised, there is generally a multi-year period for certified clients of that standard to transition from the old version of the standard to the new version. During these transitions, sometimes an auditor finds a nonconformity to the old standard that is not applicable to the newer standard. This work instruction is to provide guidance regarding NCRs when this happens during the final 12 months of any transition period. This guidance is for the use of Orion clients, auditors and staff.

Write the NCR If Requirement is Not Met

If an Auditor is performing an audit to the older version of the standard and finds an NCR that would not be an NCR if the audit was to the newer version of the standard, the Auditor must still document it as an NCR. For example, an ISO 9001:2008 audit where the client doesn't have a Quality Manual. At the next audit, to ISO 9001:2015, the client will transition and won't need the Manual, but as of now, the standard requires it, and so it must be written as an NCR.

The only exception to this is if the client can demonstrate that the requirement is being met, but in a different way. For example, if the client can show that they have a collection of documented information that could be considered the Quality Manual. It need not be a 50 page document containing all the sections in ISO 9001:2008, it just needs to meet the basic requirements. As another example, a client may have dismantled their preventive action program, but can demonstrate that their new risk program fulfills all the requirements for preventive action. For both of these examples, no NCR needs to be written, since the requirements of the standard are being met.

Grading the NCR

If the length of time until the transition deadline is 12 months or less, AND if the NCR would not be an NCR to the later version of the standard, AND if the risk to the management system from this NCR is low, an Auditor may take this into account when determining the severity of the NCR. For example, the lack of a Quality Manual at this stage in the client's certification would not normally pose a high risk to the effectiveness of the management system. For this reason, the NCR could be graded as a minor, instead of a major NCR.

If the NCR poses a high risk to the effectiveness of the management system, the NCR must be graded as a major NCR.

NCR Response and Review

For major NCRs, the severity of the NCR and the shorter due date for completion of corrective actions means that these NCRs will most likely be handled in the traditional way.



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For minor NCRs, the due date for the completion of corrective actions may fall after the deadline for transitioning to the newer version of the standard. These situations may be handled as follows.

1) Correction:

Correction is always required. Corrections are defined as the actions taken to eliminate a nonconformity. An equivalent control is also acceptable. The only option other than the client providing a Correction to address the lack, for example of a Quality Manual, would be for the client to schedule their Upgrade Audit prior to the time that the evidence of Correction is due. In that case, instead of completing the usual correction, such as providing a Quality Manual, the client could submit their upgrade to the new version of the standard as their Correction.

2) Cause:

Cause is always required. While there are numerous potential causes for this type of NCRs, in many cases the cause will be that the client failed to maintain the integrity of the existing process while transitioning to the new requirements. We will use this as our example in the text below.

3) Corrective Action:

Corrective Action is always required, and must fit with the identified cause. For the example above, a corresponding corrective action might be to review and adjust the management system to comply with the requirements and ensure the integrity of the management system for future changes. If the deadline for completion of this corrective action is after the client's upgrade audit, then the corrective action can apply to ISO 9001:2015, not ISO 9001:2008 and the transition to the new standard can be used as evidence for both parts of the corrective action, since that would include the implementation of section 6.3 "Planning of Changes."