

SSQS 101 - THE NSI QUALITY SCHEDULE FOR THE APPLICATION OF BS EN ISO 9001:2015 TO NACOSS GOLD APPROVAL



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Compliance with BS EN ISO 9001, the British, European and International Standard for Quality Management Systems, is mandatory for any United Kingdom Accreditation Service (UKAS) Accredited Quality Management Systems (QMS) Certification. The Standard can be applied to virtually any organisation whether they are manufacturing a product or supplying a service.

This Quality Schedule provides guidance and clarification on the application of BS EN ISO 9001:2015 in relation to NSI NACOSS Gold approval.

NACOSS Gold approval is for organizations that design, install and maintain electronic security systems (intruder and hold-up alarms, CCTV systems, access control systems, security fog systems, scaffolding alarm systems) and includes all associated activities such as planning, commissioning and handover.

NACOSS Gold approval requires organizations to hold Certification from NSI in respect of the Quality Management System (QMS) and all the relevant Product Standards including NSI, British, European and International standards and codes of practice required by end users and other stakeholders including the police and the insurers.

NSI holds UKAS Accreditation for both Management Systems (MS) and Product Certification (PC). Consequently the NACOSS Gold Certificate awarded to organizations holding NACOSS Gold approval displays two UKAS Crown and Tick logos.

This Quality Schedule provides guidance and clarification on the application of BS EN ISO 9001 in relation to the relevant Product Standards and the fact the services are provided in a security environment. Consequently compliance with BS EN ISO 9001 and this Quality Schedule is a condition of any NACOSS Gold approval.

Issue 8 of this Quality Schedule has been issued to reflect changes that have taken place with the introduction of ISO 9001:2015.

NATIONAL SECURITY INSPECTORATE

Sentinel House, 5 Reform Road, Maidenhead, Berkshire SL6 8BY

Telephone: 01628 637512

Fax: 01628 773367

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1 Introduction

- 1.1 The 2015 standard is based on the quality management principles described in ISO 9000, which are customer focus, leadership, engagement of people, process approach, improvement, evidence-based decision making and relationship management.

There is a stronger focus on leadership and commitment to the quality management system (see BS EN ISO 9001:2015 Clause 5).

The concept of risk-based thinking has been implicit in previous editions of ISO 9001. However the risk-based thinking applied to the 2015 edition has enabled greater flexibility to be applied to the requirements for processes, documented information and organizational responsibilities.

- 1.2 The requirements for maintaining six documented procedures has been removed and is replaced with a requirement to maintain documented information required by the Standard and documented information determined to be necessary to ensure the effectiveness of the quality management system (see BS EN ISO 9001:2015 Clause 7.5).
- 1.3 The terms 'documented procedure' and 'record' have been replaced throughout by the term, 'documented information'.

Where BS EN ISO 9001:2008 would have referred to 'documented procedures' to define control or support a process, this is now expressed as the requirement to 'maintain' documented information

Where BS EN ISO 9001:2008 would have referred to 'records' this is now expressed as the requirement to 'retain' documented information.

Documented information required by the 2015 standard includes: (1) the scope of the of the quality management system, (2) information necessary to support the operation of processes, which will probably require maintained information (documented procedures) and retained information (records), (3) the quality policy and (4) where appropriate organisational knowledge.

More detailed information on the structure, terminology and concepts introduced by the new standard can be found in BS EN ISO 9001:2015 Annex A.

- 1.4 This Quality Schedule has been produced to clarify and supplement the requirements of BS EN ISO 9001:2015 and provide an agreed basis for audit to ensure that:
- a) security systems are designed, installed and maintained by technically competent and security screened personnel to the appropriate Product Standards and contractual service agreements are fulfilled;

Product Standards for electronic security systems include PD 6662 / BS EN 50131 / BS EN 50136 for intruder and hold-up alarm systems and security fog device/systems, BS 8418 / BS EN 62676-4 or NSI Code of Practice NCP 104 / BS EN 50132-7 for CCTV systems, NSI Code of Practice NCP 109

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or BS EN 50133 for access control systems, and NSI Code of Practice NCP 115 for scaffolding alarm systems.

- b) there is a commitment to customer satisfaction and continual business improvement derived from the implementation of a QMS designed specifically to meet the needs of the electronic security systems industry, such needs having been agreed in consultation with insurers, police (NPCC, Police Scotland and PSNI), installers, trade associations and professional institutions.

- 1.5 The scope of the organization's approval is detailed on the NSI Certificate of Approval, and is referenced to the Quality Schedule.

2 Scope

- 2.1 This Quality Schedule sets out the criteria for auditing the QMS of organizations engaged in the design, installation, and maintenance of electronic security systems and does not in any way diminish "the NSI Rules of NACOSS Gold".
- 2.2 The full requirements of BS EN ISO 9001:2015 apply and, additionally, you must adhere to the requirements of this Quality Schedule.
- 2.3 In common with previous practice, this Schedule retains the alignment with the main clause numbers of the BS EN ISO 9001 Standard. Certain requirements are included from the Standard for emphasis and they do not detract from the need for you to comply with all of the requirements of the Standard. Where there are no additional requirements this is stated.
- 2.4 Requirements of this Quality Schedule you must satisfy are shown in normal text and are further emphasised by the use of "shall" or "must". Where additional guidance is given it is reproduced in italics and often further emphasised by the use of "may" or "can" within the text.

3 Definitions

In addition to the definitions in BS EN ISO 9000:2015 the following definitions apply:

- 3.1 **non-NSI security system service provider** means a security system service provider that is not an NSI approved company
- 3.2 **security screened** means having been adjudged suitable for working in the security systems industry, following completion of security screening

See BS 7858 regarding completion of limited security screening, pending completion of full security screening.

- 3.3 **sub-contractor** means an individual or company external to the organization that enters into an agreement or contract with the organization to supply processes, products and/or services means an individual or company external to the organization that enters into an agreement or contract with the organization to supply processes, products and/or services

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This definition applies, irrespective of the contractual arrangements or parties involved, to all individuals performing work for your organization who are not staff personnel.

BS EN ISO 9001 (see clause 8.4) uses the term “external provider” and this includes “sub-contractors”

- 3.4 Staff personnel** means the managing partners of the organization, the sole-proprietor of the organization, or (in the case of a limited company) the directors of the organization and employees from whose remuneration the organization deducts Income Tax and National Insurance contributions.

4 Context of the organisation

4.1 Understanding the organization and its context

No additional requirements apply to this clause of BS EN ISO 9001:2015.

4.2 Understanding the needs and expectations of interested parties

No additional requirements apply to this clause of BS EN ISO 9001:2015.

4.3 Determining the scope of the quality management system

Whilst there is no requirement in BS EN ISO 9001:2015 to hold a quality manual there is a requirement to maintain documented information that describes the scope of the QMS. When determining the scope the following must be considered:

- a. the internal and external issues affecting the QMS (clause 4.1),

Issues to consider are for example, changes in technology, the introduction or changes to standards, new legislation and personnel changes.

- b. the requirements of any relevant interested parties affecting the QMS (clause 4.2),

NOTE – interested parties may include shareholders, trade bodies, certification bodies, police forces and insurers.

and

- c. the organizations products and services affected by the QMS.

plus

- d. any justifications where the organization has determined that requirements of the standard are not applicable to the scope of the QMS (clause 4.3).

BS EN ISO 9001:2008 permitted organizations to apply exclusions to parts of clause 7 (Product realization) if the requirements could not be applied to the organization’s QMS due to the nature of the product or service. Therefore previous issues of SSQS 101 accepted the exclusion of the development aspects of clause 7.3 but not the design aspects.

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When determining the scope of the QMS to meet the requirements of BS EN ISO 9001:2015 organizations may omit ANY requirement, which is not applicable to the determined scope of the quality management system and does not affect the organisation's ability or responsibility to ensure the conformity of its products and services and the enhancement of customer satisfaction. Where an organization determines that a specific requirement does not apply to the scope of their QMS the justification is to be included within the scope of the QMS.

NSI will continue to permit organizations to omit requirements relating to the development aspects of BS EN ISO 9001:2015 Clause 8.3 Design and development of products and services provided the organization does not undertake these development activities" after the word "services". Where other requirements are not determined to be applicable these are to be justified within the scope of the QMS.

4.4 Quality management system and its processes

No additional requirements apply to this clause of BS EN ISO 9001:2015.

5 Leadership

5.1 Leadership and commitment

5.1.1 General

No additional requirements apply to this clause of BS EN ISO 9001:2015.

5.1.2 Customer focus

No additional requirements apply to this clause of BS EN ISO 9001:2015.

5.2 Policy

5.2.1 Developing the quality policy

In addition to the requirements of this clause of BS EN ISO 9001:2015, the Quality Policy must include a commitment to comply with this Quality Schedule, with industry agreed Codes of Practice, any relevant Product Standards, police force policies on response to security systems (NPCC, Police Scotland and PSNI) and applicable legal requirements.

Accredited Certification Bodies (CBs) for any management systems certification must comply with UKAS requirements to withhold or withdraw approval from companies if any breaches of applicable legislation are found. This is reflected in BS EN ISO 9001:2015 where an organization is required to identify and comply with all relevant statutory requirements applicable to product(s) and/or service(s) provided (also expressed as legal requirements).

NSI, as a United Kingdom Accreditation Service (UKAS) accredited CB, does not recommend approval (or continued approval) to BS EN ISO 9001 if there are known breaches of legal requirements that relate directly to the product or service provided.

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You must include a commitment in your Quality Policy that it is your intention to comply with applicable legal requirements and periodically to evaluate compliance with the same as an input to management review. Appropriate management must also demonstrate they are generally aware of the prime legislation that impinges on their area of responsibility and authority.

For example if an operations manager deploying installation engineers was unaware of the health & safety legislation relating to working at height then it could hardly be argued they are competent to perform their duties. This would not only be an issue in terms of the potential for legal nonconformity, but also in terms of compliance with clause 7.2 Competence.

5.2.2 Communicating the quality policy

No additional requirements apply to this clause of BS EN ISO 9001:2015.

5.3 Organisational roles, responsibilities and authorities

As detailed within the ISO 9001 Standard, you must ensure that responsibilities and authorities for relevant roles within your organization are assigned, communicated and understood within the organisation.

The size and complexity of an organization has a bearing on how such responsibilities and authorities are assigned and communicated.

In large organizations with various departmental interfaces it may be necessary to create job descriptions, schedules of key personal responsibilities and/or include this within other documented information to ensure responsibilities and authorities are effectively communicated. In very small family run organizations, provided management and staff can demonstrate on interview a common understanding of everyone's prime responsibilities and authorities, it may not be necessary to have them fully documented.

Notwithstanding the above, NACOSS Gold specifically requires certain responsibilities are clearly assigned:

- (1) for a nominated designer(s)' see clause 8.3 Design and development of products and services
- (2) for the person(s) who is (are) nominated as being responsible for all aspects of intruder and hold-up alarm system performance (commonly referred to as Systems Performance Executive(s) – see BS 8473)

BS EN ISO 9001:2008 required that an individual from within the organisation's management team be nominated to act as the Quality Management Representative (QMR). The 2015 revision does not make the appointment of a QMR a specific requirement but there remains a need for top management to assign the responsibility and authority for maintaining the quality management.

Whilst this does not forbid the organisation from appointing a sub-contracted quality consultant into this role, top management within the organisation should consider the risks associated with managing the appointment in this way and identify the means to mitigate the potential impact.

6 Planning for the quality management system

6.1 Actions to address risks and opportunities

No additional requirements apply to this clause of BS EN ISO 9001:2015.

6.2 Quality objectives and planning to achieve them

No additional requirements apply to this clause of BS EN ISO 9001:2015.

6.3 Planning of changes

No additional requirements apply to this clause of BS EN ISO 9001:2015.

However, the following are examples of situations where changes to the quality management system should be considered:

- *acquisitions and joint ventures*
- *introduction of new technologies*
- *organisational restructuring*
- *use of sub-contractors*

7 Support

7.1 Resources

7.1.1 General

Whilst you must maintain adequate security screened and competent resources, you may not always be able to provide a complete service using your staff personnel and may have to use sub-contractors. Clause 8.4.1 of BS EN ISO 9001:2015 requires you to be able to demonstrate you have established criteria for selection, evaluation and re-evaluation of suppliers of both product and services including sub-contractors.

7.1.2 People

A condition of approval under NACOSS Gold is that all personnel (directors and staff and so on) in “relevant employment” (as per the definition in BS 7858) are security screened in accordance with BS 7858.

Personnel who have been recruited prior to 1 January 2007 and who have been security screened to earlier editions of BS 7858 will not necessarily have always been subjected to a financial history or criminality check. This is acceptable and it is not our policy that organizations should subject existing security screened staff to the additional checks, unless information is received that suggests there are reasons for so doing.

You must not allow any sub-contractors in relevant employment to have access to confidential information about a customer, their premises, their property, or about any security system, until they have been security screened.

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You must not use sub-contractors at customer premises until they have been security screened.

Where limited security screening of an individual in accordance with BS 7858 has been completed sufficient for commencement of conditional employment, and full security screening is in progress but is not yet completed, such an individual may be treated for the purposes of this Quality Schedule as having been security screened. However this temporary concession on employment must not extend beyond the limited time period allowed in BS 7858 for completion of full security screening.

Where you contract directly with an individual sub-contractor, you must carry out the security screening.

This does not stop you from using the services of a third-party security screening service or bureau. However your organization (to whom the sub-contractor is directly contracted) must see and review the security screening documents and form an employment decision.

Where you contract with another company or agency to supply you with individuals to work for your organization as sub-contractors you must ensure security screening is carried out in accordance with BS 7858.

In some cases this will require you to audit the security screening files of the other company or agency to check they comply with BS 7858.

You must ensure all sub-contractors are security screened in accordance with BS 7858 (as above) except that, if your organization agrees, sub-contractors who have not been security screened may be used at customer premises for the following:

- Sub-contractors (previously designated Class M in NACP 3) experienced in the security systems industry and representing the manufacturer of security system equipment or the manufacturer's authorised agent. You must use such sub-contractors (previously Class M) only for the surveying, inspecting, testing and commissioning of security systems and for the preventive and corrective maintenance of security systems, provided you are satisfied it is appropriate to do so, and they are accompanied at all times by a member of the staff personnel of your organisation
- Sub-contractors (previously designated Class X in NACP 3) used only for specialist skills from allied trades and having no access or only relevant limited access to confidential information about a customer, their premises, their property or about any security systems
- Sub-contractors (canvassers) engaged solely to visit customer premises for the purpose of generating a sales lead (that is, with the sole aim of obtaining the customer's agreement to accept an appointment for a surveyor or other security advisor to visit). Such individuals will not enter the customer premises under any circumstances or be given access to any confidential information about the customer or their system.

We recommend the local police alarms administrator(s) should be informed when canvassers are due to operate in their area.

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Where the above exceptions are used, you retain responsibility for the conduct and integrity of the sub-contractors, and for your decision to allow the exceptions to security screening being used.

Identity cards

You must have evidence of control in respect of issue, control and withdrawal of identity cards for all staff personnel and sub-contractors who have been security screened (see clause 7.5.3 of this Quality Schedule and clause 5 of PD 6662:2010).

If you permit another company to issue identity cards for the sub-contractors they are supplying, you must ensure (for example through written agreement with the other company and subsequent audit) that identity cards are properly issued, controlled and withdrawn.

7.1.3 Infrastructure

No additional requirements apply to this clause of BS EN ISO 9001:2015.

7.1.4 Environment for the operation of processes

No additional requirements apply to this clause of BS EN ISO 9001:2015. However we draw your attention to the following note in the standard:

NOTE Environment for the operation of processes can include physical, social, psychological, environmental and other factors (such as temperature, humidity, ergonomics and cleanliness).

7.1.5 Monitoring and measuring resource

Where you engage sub-contractors (whether they are directly or indirectly engaged) you must seek assurance that all measuring devices are and remain appropriately calibrated and retain sufficient documented information to evidence this.

7.1.6 Organisational knowledge

No additional requirements apply to this clause of BS EN ISO 9001:2015.

7.2 Competence

The requirements for competency in clause 7.2 of BS EN ISO 9001:2015 states that, 'the organization shall determine the necessary competence of person(s) doing work under its control that affects its quality performance'.

It is not our intention to be too prescriptive regarding how such competency should be demonstrated, but this and the following clause suggest it is useful in most organizations to develop job descriptions for each identified role and include them in a person or job specification which can detail the required level of qualifications, experience, skills, attributes and so on that an ideal job holder should have. Reviewing candidates against the person or job specification then enables an organization to demonstrate it does endeavour to recruit the right people for each identified role in the organization.

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BS EN ISO 9001:2015 states “the organization shall ensure that these persons are competent on the basis of appropriate education, training or experience”.

The above text makes it much clearer that competency is not achieved just by providing training. The fact someone receives training does not guarantee they will be competent in carrying out their duties and therefore there has to be a system for confirming competency.

Again it is not our intention to be too prescriptive, but we suggest you should consider a probationary period for all new employees and review their competency formally before granting confirmed employment. The objective here is to identify and address any areas where competency is not immediately indicated and which could indicate a need for further training/development. Thereafter, you should have a process of verifying on-going competency which could include feedback from internal and external audit, formal staff appraisal/evaluation and so on.

You must retain appropriate documented information to evidence the competence of your people.

In determining and being able to demonstrate the availability of the necessary competence within your organization a training programme must be established that includes, where relevant:

- surveying skills
- installation skills
- inspection and test skills
- quality and/or business management training
- internal auditing skills
- product specific training.

You must be able to demonstrate the effective operation of the above training programme and provide assurance as to who attended the training.

It is not mandatory for personnel to attend external training courses. However, we recommend that selected personnel should attend such courses if the organization does not possess the necessary skills in a given area.

Sub-contractors

You must use sub-contractors only where this Quality Schedule permits (see below) and only where the individuals involved are adequately skilled, experienced, trained, briefed, organised, supervised and monitored. If you engage one or more sub-contractors directly, or you engage an individual or other company to supply sub-contractors, you must ensure there are suitable and adequate processes in place within the QMS to ensure adequate skill, experience, training and so on.

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You must have written agreements with the sub-contractors covering confidentiality of information, training and assignment to agreed tasks.

You are allowed to sub-contract the following tasks:

- generating a sales lead
- other pre-contract stages (see below)
- installing a security system
- inspecting, testing, commissioning and/or handing-over a security system
- preventive and/or corrective maintenance of a security system
- specialist skills from experienced allied trades

“Other pre-contract stages” means:

- discussing or advising upon security needs and risks
- carrying out a risk assessment
- surveying a site or premises with a view to specifying a security system
- designing or specifying a security system
- preparing a quotation for the supply of a security system (or for the supply of modifications to an existing security system)
- other pre-contract discussions or negotiations taking place subsequent to one or more of the above stages.

You must retain sufficient in-house expertise (proprietors, directors and PAYE employees) to verify an acceptable service has been provided and have evidence to show the adequacy of sub-contractors' work is validated periodically. By adequacy we mean compliance with all the relevant Product Standards and with all your organization's processes and requirements.

7.3 Awareness

No additional requirements apply to this clause of BS EN ISO 9001:2015.

7.4 Communication

No additional requirements apply to this clause of BS EN ISO 9001:2015.

7.5 Documented information

7.5.1 General

No additional requirements apply to this clause of BS EN ISO 9001:2015.

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7.5.2 Creating and updating

No additional requirements apply to this clause of BS EN ISO 9001:2015.

7.5.3 Control of documented information

Within the general practices of controlling documented information:

- a) you must make provision to list the issue status of external documents including those called up in the Rules of NACOSS Gold, Police Force Policies (NPCC, Police Scotland and PSNI) and other applicable standards and regulations.
- b) you must make provision to list the issue status of internal documented information pertinent to your QMS.
- c) if documented information is held electronically, you must observe the following safeguards and protocols:

- (1) Where a document includes a customer signature, the document must be held electronically as a facsimile copy, including a facsimile copy of the signature.

Alternatively, traceability from a customer signature on a hard copy to an electronically held document will be acceptable. Where documents held electronically require authorisation (say customer specification) then issue status must be allocated and access rights controlled by password entry at appropriate levels of authorisation.

If you introduce other arrangements, you must demonstrate that the above principles of authorisation and agreement are upheld.

It is your responsibility to determine whether specific contractual documents are required legally to be originals.

- (2) You must have robust and secure backup arrangements and you must keep to these arrangements.
- (3) You must hold backups of retained information securely (preferably in a fire-resistant container or at a secure off-site location).

We draw your attention to the Data Protection Act (DPA).

For companies considering the use of cloud computing services we draw your attention to the Information Commissioner's Office (ICO) guidance on the use of cloud computing in relation to compliance with the DPA.

- (4) You must have ready access to all documented information for the purposes of our NACOSS Gold inspections/audits/surveillance visits.

Control of retained documents

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You must include information security policies for the protection of retained information held on portable electronic devices (such as laptops, tablets, PDAs, memory sticks) and you must ensure your personnel, including any sub-contractors, keep to these policies.

For example devices should be password protected and/or have their hard drives encrypted. Also there should be restrictions on leaving devices unattended in vehicles and/or in premises that are not alarmed.

Contract information

You must maintain a system of uniquely identifying contracts and related documentation to minimise the potential for mis-filing and ensure documentation in relation to each contract and the QMS can be readily retrieved.

You must retain information in respect of contracts (including survey, design, quotations, amendments, system records, commissioning and handover documents and also, as appropriate, maintenance, disconnection, historical and false alarm records) for the life of the contract plus a minimum of two (2) years, except where permitted otherwise in the relevant Product Standard.

Information on the use of sub-contractors

You must retain detailed and complete information (or copies of such information) relating to all pre-contract visits to customer premises made by sub-contractors and all work carried out by sub-contractors. This information must include all necessary details of the risk assessment and design of a security system and of the security system installation as installed.

Where you use (or authorise the use of) sub-contractors to visit customer premises at a pre-contract stage, you must keep (or cause to be kept) a detailed log (or other suitable information) sufficient to identify unambiguously by name (or other such detail) each individual sub-contractor who has visited each premises and the date(s) and approximate time(s) of his or her visit(s).

It is sufficient if the detailed log (or other suitable information) is kept by a company working for or under your organization, provided you have access to the log, and you review and audit the log for accuracy at least twice a year for its suitability and adequacy.

NSI Certificate of Compliance

For the avoidance of doubt, you must issue the NSI Certificate of Compliance for the security system irrespective of whether or not you have used sub-contractors for any of the work.

Complaint information

You must retain information regarding complaints for the life of the contract plus a minimum of two years and you must ensure this information is readily available to our auditors.

Training information

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See BS EN ISO 9001:2015 clause 7.2 for training information.

Security screening information

For security screening information see clause 7.1.2 of this schedule.

8 Operation

8.1 Operational planning and control

You must develop processes for the design, installation, and maintenance of electronic security systems to take account of the need for the QMS to incorporate all the product and regulatory requirements of the industry. The extent and form of documented information required must take account of the need to provide evidence:

- a) that contractual obligations are agreed and understood by all parties
- b) that system design specifications reflect the level of security required
- c) of the competency of staff personnel and sub-contractors
- d) that components used on installations meet the technical requirements of the industry
- e) of in-process and final inspections including regulatory handover and maintenance documentation
- f) of adequate planning and monitoring of installation work including project management techniques where appropriate
- g) of adequate administrative and technical support to installation personnel on site
- h) of the appropriate level of on-site supervision, particularly on long running contracts

Activities for process control must be consistent with the specified installation requirements for security systems.

Requirements for intruder and hold-up alarm systems are found in BSI PD 6662, BS EN 50131 series, BS EN 50136 series, BS 8243, BS 8473, BSI DD 263, NACP 2 and NACP 11. Requirements for closed circuit television systems (CCTV) are found in NACP 2 and either NCP 104 / BS EN 50132-7 or BS 8418 / BS EN 62676-4 and requirements for access control systems are found in NACP 2 and either NCP 109 or BS EN 50133. Requirements for scaffolding alarm systems are found in NCP 115.

8.2 Requirements for products and services

8.2.1 Customer communications

The following requirements apply in addition to the requirements of this clause of BS EN ISO 9001:2015:

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Management of complaints

You must deal promptly with all complaints and in an appropriate manner including sending the complainant an acknowledgment the matter is receiving timely attention.

You must have a suitable register of complaints, which must include the date of receipt, complainant details, summary of the complaint, and a complaint reference number or code.

You must register all complaints promptly and then investigate and action them at an appropriate level of seniority.

You must find the root causes of complaints so that corrective actions are effective in preventing further occurrences. The decision on the appropriate course of action (or actions) must be documented.

When all reasonable steps have been taken to restore confidence, complaints must be closed down by entering a date of closure in the complaint register.

Complaints must be included in the review of nonconformities (see 9.3.2) and consequently clauses 10.1 and 10.2 of BS EN ISO 9001:2015.

We draw your attention to the guidelines in BS ISO 10002:2014 – Quality management – Customer satisfaction – Guidelines for complaints handling in organizations, including guidance for small businesses given in Annex A of BS ISO 10002:2014.

BS ISO 10002 defines “complaint” as “expression of dissatisfaction made to an organization, related to its products, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected”.

Such expressions of dissatisfaction could be made in a number of different ways for example in writing, including email, or orally on the telephone.

We draw your attention to the guiding principles given in clause 4 of BS ISO 10002:2014, which are recommended for effective handling of complaints:

- *visibility (well publicised information about where to complain)*
- *accessibility (easily accessible to all complainants)*
- *responsiveness (immediate acknowledgement and addressed promptly)*
- *objectivity (equitable, objective and unbiased)*
- *charges (free of charge)*
- *confidentiality (protected from disclosure except where consented)*
- *customer-focused approach (open to feedback and commitment to resolve)*
- *accountability (for and reporting on the organisation’s actions and decisions)*

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- *continual improvement (permanent objective of the organization)*

8.2.2 Determining the requirements related to products and services

The following requirements apply in addition to the requirements of this clause of BS EN ISO 9001:2015.

Maintenance Contracts

You must have a policy as an installer of intruder and hold-up alarm systems that each customer entering into a contract for the installation is required also to enter into a maintenance service agreement running for at least one year from the date of installation of the system.

The following exceptions are permitted:

- a) where you have on file evidence your customer has declined the offer of a maintenance contract (and the provisions of the relevant NPCC, Police Scotland or PSNI policy on police response to security systems do not apply).
- b) where you have evidence the contract was for installation only.
- c) where you install a system for use in connection with your own operations (for example to supervise premises you occupy). The obligation to carry out maintenance remains. However the requirement for a formal service agreement is waived. Maintenance must be carried out as if such a contract existed between you as supplier and you as user of the security system.

You may terminate a maintenance service agreement (including termination prior to the end of the first year) if any of the following circumstances arise:

- d) tenure of the supervised premises changes hands;
- e) payment is overdue, your customer having been duly invoiced and a reminder having been sent containing a warning notice to the effect that non-payment will lead to discontinuation of maintenance service (and normally to disconnection of monitoring also – see below).
- f) your customer has applied in writing to be excused from the agreement;
- g) the maintenance service agreement is transferred with your agreement to another NSI approved company.
- h) exceptionally, where your customer has acted unreasonably, made unreasonable demands on your organization, or is guilty of a substantial breach of contract.

The provision of monitoring services must be conditional upon the system being and remaining the subject of a maintenance service agreement. Where maintenance service is discontinued (whether due to expiry of the maintenance service agreement or otherwise) you must cease monitoring the system within thirty days of the cessation of

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maintenance service, having first notified your customer by writing to them at their last known address.

In all cases where maintenance service is discontinued, you must inform your customer immediately by writing to them at their last known address.

Permission to use sub-contractors

You must ensure sub-contractors are used at customer premises only to the extent that the written contract expressly allows, and then only as permitted in this Quality Schedule.

Organizations wanting to use sub-contractors may either (a) specifically tell particular customers that part (or the whole) of their contract may be sub-contracted and carried out by people who are not staff personnel of the organization, or (b) may include in their usual contract conditions a statement that sub-contracting may take place.

This Quality Schedule does not restrict an organization from bringing onto customer premises representatives of the manufacturer or supplier of equipment or components used in a security system for the purpose of advising the organization or assisting with the resolution of an identified fault or problem, provided that a member of the staff personnel of the organization accompanies such representatives at all times.

Use of sub-contractors at customer premises pre-contract

Where a sub-contractor visits customer premises before a contract has been entered into (for example as part of the selling process, and/or to undertake a survey and/or a risk assessment), it is important there must not be any scope for ambiguity or misunderstanding about which company the sub-contractor is representing, and which company's services the sub-contractor is promoting.

The "Group Rules" state that NSI approved companies may not operate in partnership or association with non-NSI security system service providers (except if NSI has allowed a special exemption, which is allowed only in limited special circumstances). The "Group Rules" are intended to safeguard members of the public and to minimize the risk of misunderstandings and complaints. Members of the public who believe that they are dealing with a representative of one or more NSI approved companies are entitled to expect the security system services they receive as a result of their contact with such persons will be in full accord with NSI requirements and will be provided by an NSI approved company.

It follows that a representative acting (in relation to the customer) on behalf of one or more NSI approved companies must not at the same time be acting (in relation to the said customer) for any non-NSI security system service provider.

During all their dealings with the customer, the sub-contractor must work solely on behalf of one or more NSI approved companies, and specifically when they are attending the customer premises, they must not display or promote the security or fire safety products or services of any non-NSI security system service provider.

You must have in place adequate safeguards to ensure a sub-contractor (canvasser) visiting solely for the purpose of generating a sales lead does not offer security advice or opinions and does not engage in "other pre-contract stages" (see above).

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If sub-contractors representing your organization visit customer premises at a pre-contract stage you must ensure the processes and contract terms are suitable and adequate to ensure the above safeguards and restrictions concerning the use of sub-contractors are complied with.

Confidentiality declarations

Sub-contractors having access to confidential information about a customer, their premises, their property or about any security system need to have signed a declaration (which must be held on file by the organization through whom they are engaged) in which the sub-contractor agrees to be bound by the requirements of confidentiality of your organization. In this declaration the sub-contractor agrees they will not at any time release information about your organization, or about its clients, to any third-party without this having been agreed beforehand, and further agreeing to be bound by this even after the certificate has expired or been cancelled and after they are no longer used by your organization.

Code of ethics regarding selling and pre-contract stages

In all cases where your organization uses sub-contractors (or permits or authorises their use) to visit customer premises at a pre-contract stage, you must develop and adopt a written code of ethics and good practice in relation to visits to customer premises and the selling of security systems, and you must make effective provision for the provisions of the code of ethics and good practice to be taught to all relevant sub-contractors, and for the code of ethics to be enforced.

You must observe and maintain high standards of fairness and integrity and you must not allow your sub-contractors to engage in misleading, unfair or pressurised selling techniques.

8.2.3 Review of requirements related to products and services

Associated practices in respect of the agreement for the system design specification are set out in clause 8.3.

For guidance, relevant requirements may be found in NACP 2 (all security systems), in PD 6662, BS EN 50131, BS EN 50136, BS 8473, NACP 11, BS 8243 and BSI DD 263 (intruder alarm systems); in BS 8418 / BS EN 62676-4 or in NCP 104 / BS EN 50132-7 (CCTV systems); in NCP 109 or in BS EN 50133 (access control systems); and in NCP 115 (scaffolding alarm systems).

a) General

The identity of the persons allocated responsibility and authority to carry out contract reviews must be clearly defined and communicated within the organization (clause 5.3 of BS EN ISO 9001:2015 refers).

b) Review

Reviews must be undertaken:

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- (1) Before submission of any tender or quotation, to confirm the requirements are adequately defined and documented and your organization has the capability and resources to meet the requirements including any statutory and regulatory requirements.

For example we draw your attention to Security Industry Authority (SIA) licensing regulations in the United Kingdom and to Private Security Authority (PSA) licensing regulations in the Republic of Ireland.

- (2) After receipt of the customer's reply to any tender or quotation, or on receipt of purchase order; to ensure any changes requested by the customer are resolved.

There must be evidence, by means such as stamp or signature, of all reviews.

You must make clear in appropriate documentation whether or not your organization accepts oral confirmation of orders and, if so, your policy must require you to send a written statement to the customer stating your understanding of the agreement and confirming that this will be taken as the agreement unless the customer notifies otherwise in writing.

- c) Amendment to contract

On completion of the installation, your processes must ensure all amendments are agreed, documented and authorized and the requirements of the contract (including, if appropriate, a remote signalling connection and notifications to third parties) are completed.

- d) Documented information

You must retain documented evidence of contract reviews for the life of the contract plus a minimum of two (2) years.

Certain contract information may need to be held for a longer period to satisfy HM Revenue and Customs and VAT requirements and so on.

- e) Customer liaison

You must maintain effective customer liaison through the life of the contract.

Clause 8.2.2 of BS EN ISO 9001:2015 makes it clear that statutory and regulatory requirements shall be determined and a new NOTE in the Standard references that supplementary services such as recycling or final disposal are post-delivery activities and must also be considered.

With any accredited management system certification there is increasing recognition that certification ought to give a level of assurance that the approved organization is aware of relevant legislation and is essentially compliant. The reference to recycling or final disposal is a useful pointer to the increasing raft of environmental legislation that applies to organizations whether or not they choose to implement an Environmental Management System. For example electronic and electrical equipment can no longer be sent to landfill (the WEEE Regulations apply) and manufacturers of certain types of

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equipment are obliged to have or participate in a take back scheme for the old equipment.

We recommend you should maintain a consolidated list of the legislation you believe is relevant to your organization (see also clause 7.5.1).

8.2.4 Changes to requirements for products and services

No additional requirements apply to this clause of BS EN ISO 9001:2015.

8.3 Design and development of products and services

8.3.1 General

We consider the detailed selection, placement and configuration of products and the interconnection to meet the specified requirements for a particular installation is application design rather than development (such as conceptual design of new products). For this reason the word 'development' has been excluded from the sub-headings of this section on design (and therefore differs in this respect from the corresponding clauses in BS EN ISO 9001).

If you sub-contract design work you must retain sufficient in-house expertise to verify that all designs, and all subsequent installations, meet the relevant Product Standards.

8.3.2 Design and development planning

In the case of intruder alarms, we draw your attention particularly to the Design clause of European Technical Specification DD CLC/TS 50131-7.

We will consider Design Planning arrangements differing from those set out in 8.3.2 below (for any organization wishing to adopt differing arrangements) provided there is evidence the arrangements adopted ensure the provisions of BS EN ISO 9001:2015, this Quality Schedule and the relevant technical and other Standards, Codes of Practice, regulatory requirements and so on are met. Any organization wishing to adopt alternative arrangements should write to us giving details.

- a) You must adopt controls to ensure:
- (1) The appropriate stages of system design specification development (viz. design planning, design inputs, design controls, design outputs and design changes; see 8.3 of BS EN ISO 9001:2015) are followed.
 - (2) The customer is made aware of and agrees to the limitation (if any) of the demands of the appropriate technical Standard and regulatory requirements of other interested parties (e.g. local authority, police, insurers).
 - (3) The customer is made aware of and agrees to any other limitations to the design (or to the proposed design) in terms of adequacy of detection/control and warning/signalling capability.

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- (4) The requirements of the customer are translated into a system design specification that is appropriate to the premises (or site) where the security system is to be installed and that lists the equipment and components to be supplied, detailing their proposed locations and containing a general indication of their coverage and purpose.
 - (5) The system design specification contains within it a Design Statement, which includes information on any limitations to the design in terms of adequacy of detection/control and warning/signalling capability. (Alternatively, the Design Statement may be a separate document, provided it is clearly referenced within the system design specification).
 - (6) There is consideration of any variations and amendments in the customer requirements as installation proceeds (or arising from practicalities coming to notice as installation proceeds), and documented agreement of such variations or amendments between customer and the organization, in the system design specification, or in properly issued amendments to the system design specification, or in an “as-fitted” system document.
- b) In discharging your responsibility (see 8.3.2 of BS EN ISO 9001:2015) to define the responsibilities and authorities for design and to manage the interfaces between different groups involved in design:
- (1) You must designate one or more suitably competent individual(s) as nominated designer(s)”.
 - (2) Each individual designated by you as a nominated designer must be competent to undertake tasks including:
 - i. acting as the focal point for matters of design of installation.
 - ii. assessing the security factors (for example relating to adequacy of detection/control and warning/signalling capability) influencing the design.
 - iii. being conversant with the products and systems specified, and with any significant security limitations inherent in such products and systems.
 - iv. ensuring that the content of quotations and system design specifications is compatible with the requirements of the applicable Product Standards, regulatory standards, and NACOSS Gold Codes of Practice.
 - v. “Signing Off” designs on behalf of the organization.
 - vi. being conversant with and up-to-date in respect of new technologies, technical Standards, regulatory standards, and national implementation of EU Directives and so on relevant to the design process.

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- vii. being conversant with installation requirements such that system design specifications are professionally compiled and finalised in a manner which gives clear and unambiguous information to the customer and to the installing technician.
- c) *There should be evidence that nominated designers are willing to seek advice and guidance as required from other companies (such as equipment manufacturers) and organisations, and to develop and to keep up-to-date their skills by such means as reading security magazines and journals, attending conferences and workshops.*
 - (1) You may choose to designate one or more suitably competent individual(s) as nominated design technician(s).
 - (2) In respect of all functions relevant to the design process (but not necessarily in respect of his/her other functions), each individual designated by you as a nominated design technician must be responsible to and must work under the authority and supervision of a named nominated designer.
 - (3) Each individual designated by you as a nominated design technician must be competent (within the range of type(s) of work where he/she acts as a nominated design technician) to undertake tasks that include those listed in (ii), (iii), (iv), (v), (vi) and (vii) of 8.3.2 (b)(2) above, except that competence in respect of (vi) is not necessary where there is evidence the effects of new technologies, regulatory standards, national implementation of EU Directives and so on relevant to the design processes of the organization have been adequately considered by a nominated designer and evidence that the constraints within which the nominated design technician operates are such as to ensure these matters are adequately taken into account in the designs prepared and/or “signed off” by the nominated design technician.
- d) In all cases, a site survey (preferably at initial enquiry stage, or at some other stage prior to issue of a quotation and system design proposal, but always at a stage prior to actual commencement of installation) must be undertaken by a nominated designer or by a nominated design technician. Final “sign off” of a system design proposal on behalf of the organization must not occur until such a site survey has been completed.

8.3.3 Design and development inputs

No additional requirements apply to this clause of BS EN ISO 9001:2015.

8.3.4 Design and development controls

No additional requirements apply to this clause of BS EN ISO 9001:2015.

8.3.5 Design and development outputs

No additional requirements apply to this clause of BS EN ISO 9001:2015.

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8.3.6 Design and development changes

No additional requirements apply to this clause of BS EN ISO 9001:2015.

8.4 Control of externally provided products and services

8.4.1 General

In accordance with clause 8.4.1 of BS EN ISO 9001, you must evaluate and select suppliers (including sub-contractors and companies who provide sub-contractors) based on their ability to supply product or service in accordance with your requirements and the requirements of this Quality Schedule, which includes the requirements of the relevant Product Standards. You must establish criteria for selection, evaluation and re-evaluation of suppliers and retain documented results including any necessary actions arising from evaluation and re-evaluation.

Use of sub-contractors

We recommend wherever possible, and particularly in relation to preventive and corrective maintenance of intruder and hold-up alarms, you should set up long-term standing agreements with sub-contractors in order to provide continuity of service meeting the requirements of this Quality Schedule. These agreements should not stand in the way of an initial probationary period or early termination clauses which come into play if a party to the agreement fails to perform adequately or is in default.

If you enter into contracts to supply the monitoring of intruder and hold-up alarms, including intruder alarms from scaffolding alarm systems, you must use only Alarm Receiving Centres (ARCs) approved by NSI (or other ARCs approved by an independent third-party approvals organization acceptable to NSI and complying with the requirements of BS EN ISO 9001 and BS 5979 or BS EN 50518 and BS 8591).

If you enter into contracts to supply the monitoring of CCTV systems (non-BS 8418), you must use only:

- Alarm Receiving Centres (ARCs) approved by NSI for monitoring CCTV systems (or other ARCs approved by an independent third-party approvals organization acceptable to NSI and complying with the requirements of BS EN ISO 9001 and BS 5979 or BS 8591) or;
- CCTV control rooms approved by NSI (or other CCTV control rooms approved by an independent third-party approvals organization acceptable to NSI and complying with the requirements of BS EN ISO 9001 and BS 7958).

In the case of CCTV system installations complying with BS 8418, you must connect them only to monitoring centres that hold NSI ARC Gold approval as Remote Video Response Centres (RVRCs) (or other RVRCs approved by an independent third-party approvals organization acceptable to NSI and complying with BS EN ISO 9001, BS 8418 and BS 5979 or BS 8591).

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8.4.2 Type and extent of control

You can use sub-contractors for any part of the service subject to compliance with BS EN ISO 9001 and the requirements of this Quality Schedule, which includes the requirements of the relevant Product Standards (such as PD 6662 / BS EN 50131 / BS EN 50136 for intruder and hold-up alarm systems).

You must:

- a) Maintain a register of all sub-contractors, which must clearly show the services they can supply;
- b) Retain documented information clearly stating the basis of selection of all sub-contractors;
- c) Conclude formal agreements that adequately cover the services to be provided and make it clear services can only be delivered by named individual sub-contractors who have been security screened and whose competency is demonstrated;
- d) Audit and monitor sub-contractors on the same basis as staff personnel;
- e) Brief sub-contractors on the organization's policies, processes, work instructions and documented information to be completed to verify completion of assigned tasks or service delivery;
- f) Retain overall responsibility for all sub-contracted services even if extensive use is made of sub-contractors;
- g) Allow us to have the right to audit the work carried out by sub-contractors and interview such sub-contractors to confirm their competence;
- h) Retain sufficient in-house expertise, if system design is sub-contracted, to enable you to verify the designs are compliant with the relevant Product Standards.
- i) You must ensure the tool kits used by sub-contractors are adequate for purpose and are consistent with your requirements.
- j) You must require your sub-contractors to allow our auditors to examine and inspect vehicles, office premises, workshops and so on used in the course of sub-contract work, and to co-operate in and facilitate such examinations and inspections.

If you carry out component and equipment repairs, you must carry out these repairs in accordance with UK Regulations covering Electromagnetic Compatibility and then only if you are the component manufacturer, the manufacturer's appointed repair agent, or you have a facility that has been assessed satisfactorily against BS EN ISO 9001 (or an equivalent specification) by a recognised, third-party certification body.

8.4.3 Information for external providers

No additional requirements apply to this clause of BS EN ISO 9001:2015.

8.5 Production and service provision

8.5.1 Control of production and service provision

Maintenance and service provision

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We remind you that maintenance and service must be carried out in accordance with published requirements (e.g. for intruder and hold-up alarm systems, PD 6662, DD CLC/TS 50131-7, DD 263 and relevant parts of NACP 11).

You must provide adequate administrative and technical support to service personnel including any sub-contractors engaged in maintenance and service).

For component and equipment repairs see 8.4.1 of this Quality Schedule.

The following specific requirements apply to maintenance of intruder and hold-up alarm systems:

a) Corrective maintenance

For intruder and hold-up alarm systems, you must have a process for false alarm management in accordance with BS 8473 (British Standard Code of Practice for False Alarm Management).

These processes must be consistent with the provisions of BS 8473 for escalating response; the identification and resolution of troublesome systems including those off Police response; the ongoing performance review by the Systems Performance Executive; and the following requirements:

- (1) The date and time of receipt of every request for corrective maintenance, together with the date and time of arrival on site and of any necessary action must be documented. This documented information must be kept for at least fifteen (15) months after the event to which it refers and the customer provided with a copy.
- (2) Authorisation from the customer for temporary disconnection must be kept for at least three (3) months after reconnection.
- (3) There must be adequate access to spares at all times.
- (4) You must audit all technicians' holdings of spares to ensure continued adequate provision (see BS EN ISO 9001:2015 Clause 9.2).

b) Preventive maintenance

You must have a process for the planning, scheduling and implementation of preventive maintenance and also for the review of preventive maintenance performance.

We draw your attention to the recommendations contained in NSI Technical Memorandum NATM.7 "Guidelines Concerning Routine Maintenance Performance of Installers / Maintainers of Intruder Alarms."

Use of sub-contractors to maintain intruder and hold-up alarms

Where maintenance of intruder and hold-up alarms is sub-contracted, the arrangements must be such that the requirements of this quality schedule and

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the industry standards (for example see DD 263) are met, as well as all other contractual obligations.

It is helpful if the sub-contractor is working under a long-term standing agreement with your organization intended to continue for several years so for example absences due to sickness can be adequately covered.

In-process inspection and testing (for example during commissioning), and final inspection and testing (for example at handover), must be consistent with the requirements of the appropriate European Standard(s) (for example DD CLC/TS 50131-7) and NSI/NACOSS Gold Codes of Practice (e.g. NACP 2, NACP 11, NCP 104, NCP 109, NCP 115) and with specific contract requirements.

Documentation commonly used in the industry includes design and installed system specifications, details of operational checks, handover checklists, completion certificates, certificates of compliance, applications for police response, preventive and corrective maintenance reports, etc. Inspection and test status is established through use of such documentation.

8.5.2 Identification and traceability

Unless customers impose special contractual conditions, your processes must reflect the extent of traceability of equipment and/or components, required for your own purposes, such as for reasons of a warranty.

Where applicable, each business process must contain provision for identifying specific traceability requirements, that is, installation historical log, false alarm history, security screening in progress and so on.

8.5.3 Property belonging to customers or external providers

Processes for the takeover of installations must be consistent with the requirements of NSI Regulations.

BS EN ISO 9001 includes a note to remind organizations that "Customer property can include material, components, tools and equipment, customer premises, intellectual property and personal data".

8.5.4 Preservation

It is important you should follow manufacturers' instructions particularly in relation to the use of batteries and to the use of electronic components sensitive to electrostatic charge.

The "first in, first out" system of stock control is recommended for batteries and other items with a limited shelf life.

8.5.5 Post-delivery activities

No additional requirements apply to this clause of BS EN ISO 9001:2015.

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8.5.6 Control of changes

No additional requirements apply to this clause of BS EN ISO 9001:2015.

8.6 Release of products and services

No additional requirements apply to this clause of BS EN ISO 9001:2015.

8.7 Control of nonconforming outputs

Documented information for the control of nonconforming process outputs, product and services must provide for identification of:

- security systems giving repeated problems (troublesome systems)
- inadequate monthly servicing (maintenance) performance
- temporary disconnections
- non-conforming security system installations
- defective components
- complaints from any parties
- any other type of nonconforming product as determined by the organization

A process should be in place to ensure customers are informed in writing of any known change to the level of police response afforded to a security system.

Means for identifying nonconforming product may be found in other parts of the QMS, for example through technical auditing of systems and through investigation of customer complaints.

Corrective action forms under a corrective action processes may be used as a means for documenting the existence of nonconforming product and ensuring appropriate corrective action is taken.

9 Performance evaluation

9.1 Monitoring, measurement, analysis and evaluation

9.1.1 General

You must have a process for the management of complaints. This process must cover all complaints whether they are from directly contracted customers or from stakeholders including the police and the insurers. This process (or a separate one) must also cover situations where we contact you about a complaint made to us about your organization.

The process for management of complaints can be included in the process(es) for the control of nonconforming product (see 8.7) or can be a stand-alone process.

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9.1.2 Customer satisfaction

You must monitor customer perceptions of the degree to which requirements have been met.

Sources of information on customer perception could include:

- *the outcome of customer satisfaction surveys*
- *the number of sales arising from recommendations*
- *the number of installations taken over by competitors*
- *the number of installations deemed as “troublesome” for reasons attributable to your organization (including shortcomings in sub-contracting arrangements)*
- *complaints against your organization*
- *letters of commendation received from satisfied customers*
- *other sources as determined by you*
- *trends in false alarm performance*
- *warranty claims*

The maintenance of good relationships with customers is a significant factor affecting the success and growth of any business. Concern for the customer should be part of the overall business strategy.

You should set out to avoid complaints. When complaints do occur, the objective should be to come out of each situation with a strengthened relationship with whoever is complaining.

9.1.3 Analysis and evaluation

Your analysis of data must include provision of information relating to: -

- customer satisfaction (see clause 9.1.2)
- external suppliers of products and services (see clause 8.4)
- core business processes

In relation to customer satisfaction, you must analyse the causes of complaints. The analysis must form part of the input to management review (see clause 9.3.1).

The main purpose of the analysis is to assist you in deciding on appropriate corrective action with a view to improving customer satisfaction and reducing future incidence of complaints.

The following analysis of rectified complaints by ‘cause code’ is suggested:

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- *unsatisfactory work (relating to fixing and finishing)*
- *unsatisfactory installation (relating to performance or safety)*
- *disputed service charge*
- *failure to meet service contract (including corrective maintenance)*
- *lack of timely response to enquiries and complaints*
- *dispute over rental/maintenance charge*
- *behaviour of organization's personnel*
- *behaviour of sub-contractors (if used)*
- *accounts dispute (not emanating from one of the items listed above)*
- *other (use text)*

You must examine causes of complaints at appropriate intervals and make (and document) suitable decisions or recommendations regarding corrective action (for example in relation to common causes of complaint).

For the installation and maintenance of intruder and hold-up alarms the following must be followed:

- False alarm statistics reviewed by the Systems Performance Executive on an ongoing basis (see BS 8473). Such statistics and trends must also form part of the Management Review.
- The level of achievement for preventive (routine) maintenance performance. This information must also form part of Management Review (as well as providing the information necessary to deliver any corrective actions that may arise).
- The level of achievement in respect of four hour response to requests for corrective (i.e. emergency) maintenance. This information must also form part of Management Review (as well as providing the information necessary to deliver any corrective actions that may arise).

9.2 Internal audit

The requirements are as specified within BS EN ISO 9001:2015, with the clarification that the audit programme must include:

- a) Technical auditing of the work of each installing technician (including any sub-contractors) using appropriate installation checklists encompassing the specific requirements of the standards and codes of practice for the security systems installed (intruder and hold-up alarms, CCTV and/or access control).

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- b) Technical auditing of the work of each maintenance technician (including any sub-contractors) using appropriate maintenance schedules encompassing the specific requirements of the standards and codes of practice for the security systems maintained, and using installation checklists (as detailed immediately above) to confirm the standard of installations.

You must plan, establish, implement and maintain an internal audit programme, which must include a statement (or statements) of the frequency at which audits shall be undertaken (a minimum of one per technician (including any sub-contractors) over a twelve month period) and the person(s) nominated by the organization to undertake the audits. You must also define the steps to be taken if the installations selected fail to meet the specified criteria and you must include a reference to possible training needs and/or an increase in the frequency and number of audits.

Where you sub-contract to another NSI approved company holding the correct scope of approval for the work being carried out you do not have to audit the work of the other company's technicians provided you can show you have assessed the risk and determined the circumstances when you will carry out audits, for example in relation to high risk premises and/or the occurrence of customer complaints.

Your capability to monitor standards of installation and service is an auditable element of NACOSS Gold and you must be able to demonstrate you are capable of identifying all your own nonconformities.

Selection, auditing and review of sub-contractors

In accordance with BS EN ISO 9001, thorough and effective processes must exist for the selection, auditing and periodic review of sub-contractors.

The level of auditing of sub-contracted work must not be less than the level of auditing that is applied to work undertaken by the organization's own staff personnel.

Where the auditing of the work of sub-contractors is undertaken by a sub-contractor company by, through or under which the sub-contractor is engaged, you must inspect the audit documents and carry out audits of installations to verify the standard of the sub-contracted audits and periodically you must accompany the sub-contractor's auditor on witnessed audits. You must retain information on the audits and checks you carry out.

9.3 Management review

9.3.1 General

The general requirements set out in clause 9.3.1 of BS EN ISO 9001:2015 apply.

We recognise there are different views as to who are the top management personnel who should carry out the management review. Each case has to be considered on its own merit, particularly in large multi-layered organizations such as PLC's. For example it may not be practical or necessary for all Directors to be present at the management review meetings, if when interviewed on actual audit, they can demonstrate awareness of all significant issues raised at the meetings.

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9.3.2 Management review inputs

Top management must review the organisation's quality management system, which must include, but not be limited to, the following areas as appropriate to the type of security systems installed:

- the status of actions from previous management reviews;
- changes in internal and external issues that are relevant to the quality management system (including changes in legislation, changes in police policies);
- information on the performance and effectiveness of the quality management system, including trends in:
 - customer satisfaction and feedback from relevant interested parties (including the analysis of complaints);
 - the extent to which quality objectives have been met;
 - process performance and conformity of products and services (including performance and trend analysis for routine maintenance, response to emergency call outs and false alarms(where applicable);
 - non-conformities and corrective actions;
 - monitoring and measurement results;
 - audit results;
 - the performance of external providers (including suppliers, sub-contractors and alarm receiving centres);
 - effectiveness of continual improvement initiatives
- adequacy of resources (including human, equipment and facilities);
- the effectiveness of actions taken to address risks and opportunities;
- opportunities for improvement (including assessment of new software and hardware);
- review adequacy of Quality Policy and Quality Objectives
- training needs and requirements
- infrastructure (when appropriate)
- evaluation of legal compliance

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9.3.3 No additional requirements apply to this clause of BS EN ISO 9001:2015.

10 Improvement

10.1 General

No additional requirements apply to this clause of BS EN ISO 9001:2015.

10.2 Nonconformity and corrective action

You must have effective process(es) for the development and implementation of appropriate corrective actions where a nonconforming process output, product or service is identified, including false alarms, substandard installations, poor service performance and customer complaints to prevent the recurrence of the non-conformity.

Clause 10.2 of BS EN ISO 9001 makes it clear the organization must take action to eliminate the causes of nonconformities in order to prevent recurrence and that nonconformities include customer complaints.

You must carry out root cause analysis to find the causes of nonconformities in order to support the corrective actions taken in response to nonconformities.

You must retain sufficient documentation to provide evidence of the nature of any nonconformities identified and subsequent corrective actions and you must retain evidence of the results of this corrective action. As a minimum this retained information must include evidence of the review of audit results, service reports, false alarm statistics, and customer complaints.

10.3 Continual improvement

No additional requirements apply to this clause of BS EN ISO 9001:2015.

Measures in 10.2 and 10.3 are not exhaustive. Corrective actions and opportunities for continual improvement may apply to other areas of the quality management system.