



Quality Schedule

**FRAQS 205 - The NSI Quality Schedule for the application of
BS EN ISO 9001:2015 to the NSI Life Safety Fire Risk Assessment
Gold Certification Scheme**

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NSI Life Safety Fire Risk Assessment (LSFRA) Gold, is an approval scheme combining Quality Management System (QMS) Certification and Product Certification (PC). The NSI LSFRA Gold Scheme holds accreditation from the United Kingdom Accreditation Service (UKAS) for both QMS and PC.

The QMS element of the LSFRA Gold scheme calls for compliance with BS EN ISO 9001, the British, European & International Standard for QMS.

The PC element of the LSFRA Gold scheme calls for compliance with the BAFE Fire Protection Industry document SP205 for Life Safety Fire Risk Assessment and satisfies the BAFE requirement that Certification Bodies operating a fire risk assessment scheme must demonstrate and maintain a specific UKAS PC Accreditation for BAFE SP205.

The BAFE SP205 scheme has been developed for organizations that provide fire risk assessment services in respect of life safety. The BAFE document, together with the NSI requirements, are designed to give confidence in the quality and relevance of the services being provided and to give assurance that fire risk assessments are carried out in accordance with BAFE SP205. This requires certificated organizations to employ risk assessors who are competent and, where required, security screened to a minimum standard such as BS 7858.

Compliance with BS EN ISO 9001:2015, this Quality Schedule, and BAFE SP205 is a condition of any NSI LSFRA Gold approval.

1 Introduction

1.1 Quality Schedules are designed for particular sectors of industry and are used to amplify the requirements of the QMS Standard (BS EN ISO 9001) and to provide an agreed basis for audit.

1.2 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 now 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 enables greater flexibility to be applied to the requirements for processes, documented information, and organisational responsibilities.

1.3 BS EN ISO 9001:2015 includes 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).

Documented information required includes: (1) the scope of the quality management system, (2) information necessary to support the operation of processes, which will 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 Use of a NSI LSFRA Gold approved company (called “you” or “organization” in this Quality Schedule) provides a high level of assurance that:

- a) all commissioned Life Safety Fire Risk Assessments will be carried out by competent fire risk assessors on behalf of an organization that has been assessed as compliant with the requirements within the BAFE document SP205.
- 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 fire safety industry, such needs having been agreed in consultation with insurers, fire and rescue services, building control, 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 this Quality Schedule.

2 Scope

- 2.1** Compliance with this Quality Schedule is a condition of NSI LSFRA Gold approval.
- 2.2** This Quality Schedule sets out the criteria for auditing the QMS of organizations engaged in the provision of fire risk assessments for the purpose of life safety and does not in any way diminish the NSI Regulations or the defined Scheme Criteria.
- The NSI LSFRA approval scheme or the BAFE SP205 scheme does not include risk assessment for the purposes of property protection or business continuity.
- 2.3** The full requirements of BS EN ISO 9001:2015 apply and, additionally, you must adhere to the requirements of this Quality Schedule.
- 2.4** This Quality Schedule retains the alignment with the main clause numbers of BS EN ISO 9001:2015. Certain requirements are included from the Standard for emphasis and they do not detract from the need for you to comply with all the requirements of the Standard. Where there are no additional requirements, this is stated.
- 2.5** 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, the following definitions also apply:

- 3.1 Complaint** means an expression of dissatisfaction made to an organization, related to its product or service, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected
- 3.2 Security screened** means having been adjudged suitable for working in the fire risk assessment industry following completion of security screening
- See BS 7858 regarding completion of limited security screening, pending completion of full security screening.*
- Mandatory security screening to BS 7858 is not a requirement of either the NSI LSFRA scheme or the BAFE SP205 scheme but must be completed if there is a contractual requirement.*
- 3.3 Staff personnel** means the managing partners of the organisation, the sole proprietor of the organisation or, in the case of a limited company, the directors of the organisation and employees from whose remuneration the organisation deducts Income Tax and National Insurance contributions.

4 Context of the organization

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 you must consider the following:

- a) the internal and external issues affecting the QMS (clause 4.1),
Issues to consider are for example, changes in technology, the introduction of new standards, or changes to standards, new legislation and personnel changes,
- b) the requirements of any relevant interested parties affecting the QMS (clause 4.2),
Interested parties may include shareholders, trade bodies, certification bodies, fire & rescue services and insurers,
and
- c) the organization's 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).

When determining the scope of the QMS to meet the requirements of BS EN ISO 9001:2015 organisations 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 organisation 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 permits organisations to omit requirements relating to the design and development aspects of BS EN ISO 9001:2015 Clause 8.3 "Design and development of products and services" provided the organisation does not

undertake these activities. 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 Establishing 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, the BAFe SP205 scheme, industry agreed Codes of Practice (e.g. PAS79-1), any relevant British, European or International Standards (e.g. BS 8674, BS 9792), and applicable legal and/or statutory requirements.

For any management systems certification, accredited Certification Bodies (CBs) 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 organisation is required to identify and comply with all relevant statutory requirements applicable to the 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.

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 that they are generally aware of the primary legislation that impinges on their area of responsibility and authority.

5.2.2 Communicating the quality policy

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

5.3 Organizational roles, responsibilities and authorities

As detailed within the ISO 9001 Standard, you must define and communicate responsibilities and authorities within your organization.

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

In a large organization with various departmental interfaces, responsibilities and authorities can be defined through documented items such as, a schedule of key personnel or an organizational chart

The BAFF SP205 scheme requires that all organizations, except those as classified as "Sole Traders" under the SP205 scheme are required to prepare, document, and retain a job description for all those who are involved in the management and production of fire risk assessments which specifies the organisational requirements in respect to technical skills, knowledge, experience, and behaviours and which are commensurate with the following roles.

6 Planning

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*
- *organizational restructuring*
- *use of sub-contractors or contracted-in resource*
- *changes within legislation*
- *introduction of new government guidance*

7 Support

7.1 Resources

7.1.1 General

Whilst you must maintain adequate competent resources, you may not always be able to provide a complete service using your staff personnel and may have to use subcontractors or a contracted-in resource. 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 subcontractors.

7.1.2 People

You must adopt a documented policy statement in relation to the security screening of personnel who visit customers' premises for the purpose of carrying out life safety fire risk assessments. The documented policy statement must cover staff personnel and also sub-contract personnel. A copy must be available to customers and prospective customers on request.

NSI LSFRA Gold is not prescriptive as to the content of the policy statement. However, you must be clear to your customers whether or not you ensure all personnel visiting customers' sites, or having access to confidential information, are security screened in accordance with BS 7858 or to another security screening standard as may be required under contractual obligations.

Your internal procedures and practices must ensure that any contractual obligations regarding use of security screened personnel are met.

Identity cards

All staff, including sub-contractors, coming into contact with customers and their representatives must carry an identity card or other equivalent means of identification. Such identity cards must as a minimum include the name and a current photograph of the individual, the name of the organization represented and a contact telephone number for verification purposes.

You must have evidence of control in respect of issue, control and withdrawal of identity cards.

Dependent upon the client base and the type of sites visited you may also need to consider incorporating additional information on the identity cards, for example issue and expiry dates, signature and so on, and have clearly defined procedures to recover identity cards from leavers.

If you permit another company to issue identity cards for the sub-contractors they are supplying to your organization, 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

Where a virtual office is used, the requirements of OP2-085 "Requirements for use of a Virtual Office Environment" must be met.

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:

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

Specific aspects of legislation may apply in some cases and NSI approval will not normally be granted if there are any areas of nonconformity with regard to applicable legislation.

7.1.5 Monitoring and measuring resource

You must maintain a register of all instruments and equipment used for measurement, inspection and testing purposes and where relevant you must retain up-to-date records of calibration.

Whilst it is not usual for life safety fire risk assessments to require the use of measuring equipment, a client specification may, for example, require the determination of fire alarm sound pressure levels throughout the premises.

Where an organization uses measuring devices for "indication purposes only" these are not subject to formal calibration procedures and control.

7.1.6 Organizational knowledge

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

7.2 Competence

In accordance with clause 7.2 of BS EN ISO 9001:2015, you must determine the necessary competence of persons doing work under your control that affects the performance and effectiveness of the QMS and you must ensure these persons are competent on the basis of appropriate education, training and experience.

Where applicable, you must take actions to enable people to acquire the necessary competence and you must evaluate the effectiveness of the actions taken.

You must ensure the relevant competency requirements required by the BAFE SP205 scheme and BS 8674 "Built environment – Framework for competence of individual fire risk assessors – Code of practice" are incorporated into your management system.

You must retain appropriate documented information as evidence of competence.

Training records must normally include the identity of the trainer and trainee and include evidence to substantiate that staff have the necessary fire risk assessment competence with respect to the scope of the assessments they are expected to carry out.

Where training records are held electronically and do not include actual signatures to confirm attendance, you must be able to demonstrate clearly by alternative means the individuals did attend the referenced training session(s), for example diary entries, invitations to attend at certain times and dates, rostering records, timesheets, issue of certificates of attendance and so on.

Sub-contractors

The SP205 scheme recognises that some fire risk assessors may be employed on a part time, temporary, or sub-contracted basis.

The BAFE SP205 scheme recognises that some approved organizations use "contracted-in resource" who are individuals employed on a part time, temporary or zero hours contract basis but come under the direct control and supervision of the approved organization and operate to the approved organization's management system and processes/procedures. These individuals are considered to be "employees" of the approved organization and are not considered to be "sub-contractors".

You may use sub-contractors only as permitted by the BAFE SP205 scheme 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 procedures and controls in place within the QMS to ensure adequate skill, experience, training and so on.

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

You must retain sufficient in-house expertise 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 such as BAFE SP205 and with all your organization's procedures 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

You must ensure your QMS includes the documented information required by BS EN ISO 9001:2015 and the documented processes/procedures required by the BAFE SP205 scheme.

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

You must have robust and secure backup arrangements for any documentation or records held electronically.

You must hold backups of retained information securely. Where data is backed up to a physical device (e.g. portable hard drive) these should be stored in a fire resisting data safe.

Where data is backed up to a cloud backup service, it is recommended the service provider is certificated to BS EN ISO/IEC 27001.

We draw your attention to the General Data Protection Regulation (GDPR) and the Data Protection Act (DPA).

For companies considering, or already using, 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.

You must have ready access to all documentation and records for the purposes of receiving NSI LSFRA Gold audits and so on.

Control of retained documents

Your QMS must include information security policies for the protection of retained information held on portable electronic devices (such as laptops, tablets, 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 retain documented information in respect of fire risk assessments including any evidence gathered during the course of undertaking the fire risk assessment for the period as defined in the BAFE SP205 scheme document.

Complaint information

You must retain documented information in respect of complaints for a minimum of 2 years after the date the fire risk assessment was carried out.

8 Operation

8.1 Operational planning and control

You must develop processes/procedures as required by the BAFE SP205 scheme document for the provision of life safety fire risk assessments.

8.2 Requirements for products and services

8.2.1 Customer communications

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

8.2.2 Determining the requirements related to products and services

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

8.2.3 Review of requirements related to products and services

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).

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 this will be taken as the agreement unless the customer notifies otherwise in writing.

You must retain documented evidence of contract reviews for a minimum of two (2) years after the fire risk assessment was carried out.

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

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

We accept that clause 8.3 of BS EN ISO 9001:2015 does not normally apply to companies solely providing fire risk assessments for life safety. Either the customer will specify the design of the risk assessment or a design which uses, or is similar to, the publicly agreed specification PAS 79-1 or BS 9792 will usually be suitable and sufficient.

Compliance with the remaining clauses of BS EN ISO 9001:2015 should provide adequate assurance that the organization has the appropriate processes in place to carry out an effective contract and specification review in order to plan, execute and maintain an effective service in accordance with the specified requirements.

8.4 Control of externally provided processes, products and services

8.4.1 General

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

8.4.2 Type and extent of control

You may use sub-contractors only as permitted by the BAFE SP205 scheme document (see 7.2). You must:

- a) Maintain a register of all sub-contractors, which must clearly show the services they can supply.
- b) Record clearly 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 (where required) and whose competency is demonstrated.

- d) Audit and monitor sub-contractors as required by the BAFE SP205 scheme.
- e) Instruct sub-contractors on the organization's policies, procedures, work instructions and records 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 NSI to have the right to audit the work carried out by sub-contractors and interview such sub-contractors to confirm their competence.

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

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

8.5.2 Identification and traceability

You must maintain a system for uniquely identifying each risk assessment, associated enquiries, contractual documentation, notes, photographs, observations and evidence gathered through third parties. You must minimise the potential for mis-filing and ensure documentation in relation to each contract and the QMS can be readily achieved.

8.5.3 Property belonging to customers or external providers

Where an organization is in possession of keys to a client's property you must ensure you have suitable processes/procedures in place for their safe keeping.

8.5.4 Preservation

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

8.5.5 Post-delivery activities

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

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

Your retained documentation for control of nonconforming output must provide for potential failure to:

- (a) Determine the client's requirements accurately at the enquiry stage.
- (b) Deliver a life safety risk assessment that fails to meet relevant legislative requirements or the requirements of the BAFE SP205 scheme.
- (c) Deal with nonconforming outputs identified through the internal audit process.

You must be able to show how non-conformance is controlled and who has responsibility to deal with each situation. It must be possible to identify the available options, in each situation, to assist in determining the correct course of action.

9 Performance evaluation

9.1 Monitoring, measurement, analysis and evaluation

9.1.1 General

You must have a process for the management of complaints (see clause 10.2). This process must cover all complaints whether they are from directly contracted customers or from other parties. This process (or a separate one) must also cover situations where we contact you about a complaint made to us about your organization.

9.1.2 Customer satisfaction

You must monitor customer perceptions to assess how effectively their requirements are being met.

Sources of information on customer perception could include:

- *the outcome of customer satisfaction surveys*
- *the number of risk assessments arising from recommendations*
- *letters of commendation received from satisfied customers*
- *retention of contracts*
- *complaints against your organization*
- *other sources as determined by you*

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, wherever possible, 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)
- suppliers of products (including services) (see clause 8.4)
- core business processes such as the time taken to provide the customer with the completed risk assessment from the time the initial contract to carry out the assessment was accepted

Timescales may well be incorporated into the contract in which case they can be used as the benchmark when analysing data.

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 9.3.2).

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:

- a) *unsatisfactory life safety risk assessments*
- b) *failure to meet contract conditions*
- c) *disputed charges*
- d) *lack of timely response to enquiries and complaints*
- e) *behaviour of staff personnel*
- f) *behaviour of sub-contractors (if used)*
- g) *other (use text)*

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

9.2 Internal audit

The requirements are as specified within BS EN ISO 9001:2015, with the clarification that the audit programme must include auditing of Lead Assessors, fire risk assessors and subcontractors to the requirements of the BAFE SP205 scheme.

Your capability to monitor standards of life safety fire risk assessment provision is an auditable element of NSI LSFRA Gold and you must be able to demonstrate you can identify all your own nonconformities.

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 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 of the organization to be present at the management review meetings if, when interviewed on actual audit, they can demonstrate awareness of all the significant issues raised at the meetings.

9.3.2 Management review inputs

Top management must review the organization's QMS, which must include, but not be limited to, the following areas as appropriate to the scope of the fire risk assessments carried out:

- The status of actions from previous management reviews
- Changes in internal and external issues that are relevant to the quality management system (including new, or changes to, legislation, and changes in Government guidance etc).
- 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
 - non-conformities and corrective actions

- monitoring and measurement results
 - results of internal and external audit
 - the performance of external providers (including suppliers and sub-contractors)
 - effectiveness of continual improvement initiatives
- Adequacy of resources (including human, equipment and facilities)
 - The effectiveness of actions taken to address risks and opportunities
 - Planned changes (internal & external) that could affect the organization
 - Opportunities for improvement (including assessment of new software and hardware)
 - Review adequacy of Quality Policy and Quality Objectives
 - Competency evaluation and training needs including Continuing Professional Development
 - Infrastructure (when appropriate)
 - Evaluation of legal compliance

9.3.3 Management review outputs

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

Clause 10.2 of BS EN ISO 9001:2015 makes clear the need to take action to eliminate the causes of nonconformities in order to prevent recurrence and that nonconformities include customer complaints.

You must have an effective process (or processes) for the development and implementation of appropriate corrective actions where a nonconformity is discovered in order to prevent a recurrence of the nonconformity.

Nonconformities include substandard fire risk assessments, poor service performance and justifiable 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 and customer complaints.

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 10002:2018 – Quality management – Customer satisfaction – Guidelines for complaints handling in organisations, including guidance for small businesses given in Annex B of BS ISO 10002:2018.

BS ISO 10002 defines "complaint" as an "expression of dissatisfaction made to an organisation related to its product or service, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected".

Such expressions of dissatisfaction can 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 10002:2018 which are recommended for effective handling of complaints:

- *Commitment (committed to defining and implementing a complaints-handling process).*
- *Capacity (sufficient resource to deal with complaints effectively and efficiently).*

- *Transparency (well publicised information about where, and how, to complain).*
- *Accessibility (easily accessible to all complainants).*
- *Responsiveness (immediate acknowledgement and addressed promptly).*
- *Objectivity (equitable, objective, and unbiased).*
- *Charges (free of charge).*
- *Information integrity (handling of complaints and data collection).*
- *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).*
- *Improvement (permanent objective of the organisation).*
- *Competence (personnel have the necessary competence to handle complaints).*
- *Timeliness (complaints resolved in a timely manner).*

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 QMS.