

ICTS sàrl - Quality Procedure	QP07	Revision 2.0
	Date	08-03-2019
Certification of Persons - Procedure for Complaint and appeal		

1.0 Purpose

The purpose of this procedure is to describe handling of incident, complaint and appeals received from the candidate / certified person, in house and from other parties.

2.0 Scope

This procedure covers all complaint and appeal received at Individuals by any means, like written, verbal, e-mail etc. It also includes adverse findings during examination.

3.0 Responsibility

3.1 Compliance Manager is responsible for receiving the complaint and appeal from the candidate / certified persons / other parties. Compliance Manager, in consultation with the office staff and examiners / invigilators, is responsible for handling, validating and analysis of the complaint and appeal to the satisfaction of the candidate / certified persons / other parties

3.2 The overall responsibility to execute this procedure is given below:

Activity	Responsibility
Completion and submittal of incident report records for entry into the Corrective Action System	All Certi-Trust staff members
Incident investigation and analysis	Compliance Manager
Handling of Appeal and Submission to Appeal subcommittee (for appeals)	CEO
Appeal review, analysis and decision	Impartiality Committee

4.0 Description of activity

4.1 Examination Incidents

4.1.1 For the purpose of this document "Examination incidents" are defined as complaints, suggestions, observations and opportunities for improvement. Examination incidents data is entered into the Corrective Action System for proper treatment (QP04). This procedure describes the methodology by which Certi-Trust collects and processes incident reports; and communicates the impact to staff members.

4.1.2 Certi-Trust recognizes that incidents occur in daily operation that collectively have an impact on the examination process. In order to properly analyze and address system issues a consistent and thorough process for collection of information is vital.

4.2 Complaints

Complaints are incidents of grievance or dissatisfaction with Certi-Trust Complaints that may be:

- internal in nature – raised by a Certi-Trust staff member with regard to internal service, operations or employee performance
- external in nature – raised by Certi-Trust candidate / certified persons, suppliers or other affiliated organizations
- complaints raised by candidate / certified person's stakeholders

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4.3 Terminology used in this procedure for incidents

The incidents and complaints are considered as any of the below 4 elements and procedure describes the system for handling the same.

4.3.1 Suggestions

Certi-Trust recognizes that positive feedback is as important as negative. Suggestions are vital in identifying preventive action and system improvement. As with complaints, suggestions may be internal or external in nature, written or verbal.

4.3.2 Appeals

Certi-Trust recognizes that the candidate / certified person may have some reservations or may not agree with the conduct of examiners / invigilators, Examination findings, certification committee decision and / or overall interaction with Certi-Trust staff. Candidate / certified person is free to communicate the same to Certi-Trust Impartiality Committee and this is treated as an appeal from the candidate / certified person.

4.3.3 Observations

Observations are witnessed incidents of service / operational deficiency, malfunction and or failure. Observations are often made by individuals independent of the activity witnessed and therefore objective in nature. Observations also play important role in identification of preventive action and system improvement.

4.3.4 Opportunities for Improvement

Opportunities for Improvement are incidents where the system has not failed, yet greater operational efficiency may be obtained in analyzing current practice. Opportunities for Improvement are often collected internally, but input from external sources is also beneficial.

4.4 Receipt of Incidents

4.4.1 The incident may be reported by any means – verbal or written. In case of an external source, the incident report may be received by any staff member. The staff member shall fill the Incident report recording all the information and details of the complaint. The filled report shall be submitted to Compliance Manager for further action. In case of internal source, the incident report shall be filled by the staff member and submit to Compliance Manager.

4.4.2 Compliance Manager shall contact (telephone, email, letter) the external source to acknowledge the receipt of information within 5 working days of receipt. Compliance Manager shall understand the issue in detail from the source (to avoid any error in writing the report). Compliance Manager may decide to personally meet the initiator, depending on the gravity and seriousness of issue.

4.4.3 In case of Complaints and Observations, it may be against Certi-Trust (a system / procedure or a person) or a Certi-Trust certified company (candidate / certified person). In case of suggestion / opportunity for improvement, it is for Certi-Trust to study the suggestion and decide.

4.4.4 All such incidents received by any means or by any one is first of all recorded in the Incident report with the details of;

- Complaint and appeal sr. No.,
- Mode of receipt,
- Received by,

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- Date,
- Name of candidate / certified person / other parties,
- Description of complaint and appeal,
- Reference of services against, which complaint and appeal is raised along with the reference, date and other details,

4.4.5 Candidate / certified person / other parties' complaint and appeal incident report are issued to the Compliance Manager for analysing the root cause.

4.4.6 Compliance Manager validates the complaint after checking necessary back-up records or personal interview of examiners / invigilators / staff members (who were involved in to job).

4.5 Handling of Candidate / certified person Complaint and Observations

4.5.1 In case of a complaint / observation against Certi-Trust, the Compliance Manager analyses the issue to determine if there is system error or person error. Compliance Manager shall determine the root cause and determine correction, corrective and preventive action. The possible complaints could be:

- Administration – problems with appointments, certification files, certificates issued or issued late,
- Examiners / invigilators / subcontractor problems with incomplete Examination or surveillance documentation
- Agents – problems with general compliance with Certi-Trust administration or Examination procedures

4.5.2 The correction is affected immediately to satisfy the complainant. This may include training / counseling the person involved. The CAPA is discussed with management during next Management Review. Appropriate action is taken based on discussions (change in procedure / formats, training to all personnel etc.). An email may be sent out to all concerned staff detailing the issue and remedial action (for information). A copy of the complaint and investigation details is maintained in the respective individual's personnel file for reference at the performance appraisals.

4.5.3 In case of a complaint / observation against a candidate / certified person, the Compliance Manager studies the complaint and discusses with the examiners / invigilators (last Examination). If the complaint is found genuine and valid i.e. indicates a system failure, the complaint is sent to the candidate / certified person for a response. No confidential reports or information will be sent to complainants without written permission from the candidate / certified person. Adequate time is given to the candidate / certified person for response. If required, Compliance Manager follows up with the candidate / certified person for the response. Depending on the response, Compliance Manager may decide to:

- Write to the complainant about the response and asks for his response.
- Ask further clarification from the candidate / certified person
- Depute an examiners / invigilator to personally visit the candidate / certified person and investigate for system failure. Such visit shall be considered as special visit and charged to candidate / certified person.
- Request a joint meeting with candidate / certified person, complainant and Certi-Trust.

4.5.4 Compliance Manager shall communicate with the complainant at the end of the process detailing the findings and to formally close the complaint. A copy of the correspondence is kept in the candidate / certified person file for records and the same is passed to examiners

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/ invigilators during next Examination. The details of all complaints and action taken (Correction, CAPA) are discussed in Management Review and Impartiality Committee meeting.

4.6 Handling of Appeals

4.6.1 Any candidate or certified person, who fails to satisfy an examination or surveillance, may appeal against the decision. Where an appeal is received the following procedure will be followed.

4.6.2 The Certification Manager will appoint the members of the Impartiality committee who will hear the appeal and determine the outcome. The decision on the appeal shall be taken based on the decision by Certi-Trust Impartiality committee. Results of the appeal will be reported to the next management review.

- All appeals shall be received by the Certification Manager and details of appeals shall be recorded in the Appeals Register maintained by the Certification Manager.
- Certification Manager shall investigate the appeal made and inform the candidate / certified person about its plan of action for investigation and action there upon.
- An investigation report (Incident Report) for each individual appeal shall be maintained by the Certification Manager. In case, any further corrective action is required post actions identified and taken based on Incident report – Corrective action procedure QP04 is implemented.
- A copy of the investigation report shall be sent to the candidate / certified person.
- In case of any further ambiguity, the same shall be reviewed by the board of Directors and appropriate decision arrived at.
- In case the issue still remains open; the same shall be intimated to the accreditation board for its valuable comments.
- All appeals made are collated and analyzed on a yearly basis.
- Necessary corrective and preventive actions shall be taken based on the appeal trend.
- Appeal trends and corrective and preventive action taken shall also be reviewed as part of the Management committee meeting and Impartiality committee meeting.
- Certification Manager shall ensure that details with respect to the appellant and actions there upon is not shared with the Examination team members.
- Certification Manager shall ensure that no discriminatory action is taken against the appellant.
- The candidate / certified person is made aware of the appeals process and is available to him on request.

4.7 Handling of Suggestions / Opportunity for improvement

- In case of suggestion / opportunity for improvement, the source is predominantly internal, and the concerned staff member fills the incident report and submits to Compliance Manager. The other source may be internal / external Examination.
- The Compliance Manager studies the suggestion to determine any conflict with ISO/IEC 17024 or Certi-Trust Policies. In case the suggestion is in conflict, the same is communicated to the initiator. However, the suggestion is also discussed in Management review. In case the suggestion is found not in conflict, the suggestion is studied for benefits and the impact on other processes.
- The suggestion is accepted if found beneficial and does not adversely impact any other process. The Compliance Manager determines the changes in existing documentation and implements through Document Control process (QP01).

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- If any candidate / certified person or interested party asks for the appeal / complaint handling process, then it is forwarded to the Compliance Manager. He will inform a candidate / certified person / any other interested party the appeals and complaint handling process of Certi-Trust if any complaints / appeals are received by candidate / certified persons / interested party

4.8 Closing of complaint and appeal

4.8.1 Depending on the nature of the non-conformity, the Compliance Manager or the Certification Manager may follow up with requests for corrective and preventive actions. When the investigation of candidate / certified person complaint and appeal determines that remote operation or other external organizations contributed to the complaint and appeal, the Certification Manager or his delegate contacts these organizations and provides them with all relevant information.

4.8.2 Every candidate / certified person complaint and appeal is recorded. The records are maintained by the Compliance Manager / Certification Manager. When there are copies of written communication, reports and other documents related to a complaint and appeal, these records are organized into a file and are identified with the complaint and appeal number and also having records of the corresponding corrective or preventive actions. The records of investigations that concern product quality or other test characteristics are maintained by Compliance Manager. Based on analysis of Candidate / certified person / Other Parties complaint and appeal, necessary actions are taken, and candidate / certified person is replied for closing the complaint and appeal. The Compliance Manager identifies need for taking corrective and preventive action to prevent such complaint and appeal in future and accordingly concerned person is informed.

4.8.3 All the complaint and appeal received by Certi-Trust will be closed within 7 working days after solution has been proposed to the complainant, except if the complainant declares he/she is not satisfied with the answer. If so, it will be treated as per this procedure as a new complaint/appeal. Certification Manager or the Compliance manager is authorised for closing of complaint and appeal.

5.0 References

- 5.1 QP01 Procedure for control of documents
5.2 QP04 Procedure for corrective and Preventive action

6.0 Enclosures None

7.0 Formats / Exhibits

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