

 African Certification and Testing (Pty) Ltd Quality Procedure	No.	QP07
	Revision No.	05
	Effective Date	28-03-2025
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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 client, in house and from other interested 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 evaluation.

3.0 Responsibility

3.1 **Systems Quality Manager** is responsible for receiving the complaint and appeal from the clients / other interested parties. They in consultation with the director(s) and evaluators are responsible for handling, validating and analysis of the complaint and appeal to the satisfaction of the clients / other interested 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 African Certification and Testing . staff members
Incident investigation and analysis	Systems Quality Manager
Handling of complaint and appeal and submission to committee	Systems Quality Manager
Review, analysis and decision for closing	Systems Quality Manager Impartiality Committee

4.0 Description of activity

4.1 Evaluation Incidents

4.1.1 For the purposes of this document “Evaluation incidents” are defined as complaints, suggestions, observations and opportunities for improvement. Evaluation incidents data is entered into the Corrective Action System for proper treatment (QP04). This procedure describes the methodology by which **African Certification and Testing** collects and processes incident reports; and communicates the impact to staff members.

4.1.2 **African Certification and Testing** recognizes that incidents occur in daily operation that collectively have an impact on the evaluation process. In order to properly analyze and address system, issues a consistent and thorough process for collection of information is vital.

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4.2 Complaints

Complaints are incidents of grievance or dissatisfaction with **African Certification and Testing**. Complaints may be:

- internal in nature – raised by a **African Certification and Testing** staff member with regard to internal service, operations or employee performance
- external in nature – raised by **African Certification and Testing** clients, suppliers or other affiliated organizations
- written
- verbal
- complaints raised by client's or stake holders

4.3 Terminology used in this procedure for incidents

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

4.3.1 Suggestions

African Certification and Testing 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

African Certification and Testing recognizes that the client may have some reservations or may not agree with the conduct of evaluators, Evaluation findings, certification committee decision and / or overall interaction with **African Certification and Testing** staff. Client is free to communicate the same to **African Certification and Testing**.

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.

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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 Systems Quality Manager for further action. In case of internal source, the incident report shall be filled by the staff member and submit to Systems Quality Manager.
- 4.4.2 Systems Quality Manager shall contact (telephone, email, letter) the external source to acknowledge the receipt of information within 5 working days of receipt. He/She shall understand the issue in details from the source (to avoid any error in writing the report). He/She 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 **African Certification and Testing** (a system / procedure or a person) or a **African Certification and Testing** certified companies (client). In case of suggestion / opportunity for improvement, it is for **African Certification and Testing** to study the suggestion and decide.
- 4.4.4 Upon receipt of a complaint or appeal, the Systems Quality Manager confirms whether the complaint or appeal relates to certification activities for which ACT is responsible. The incident report (F20) is used for this confirmation.
- If the Systems Quality Manager confirmed that the complaint or appeal related to certification activities for which ACT is responsible it is addressed as per the procedure for corrective and preventive actions (QP04).
- 4.4.5 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,
 - Name of client / other interested parties,
 - Description of complaint and appeal,
 - Reference of services against, which complaint and appeal is raised along with the reference, date and other details,
- 4.4.6 Client / other interested parties' complaint and appeal incident report are issued to the Management Representative for analysing the root cause.
- 4.4.7 Systems Quality Manager validates the complaint after checking necessary back-up records or personal interview of evaluators / staff members (who were involved in to job).

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4.5 Handling of Complaint and Observations

- 4.5.1 Upon receipt of a complaint the Systems Quality Manager shall confirm whether the complaint relates to certification activities ACT is responsible for. If so, ACT will deal with it.
- 4.5.2 If the complaint relates to a certified client, the Systems Quality Manager shall examine the complaint and consider the effectiveness of the certified management system. In such a scenario, the Systems Quality Manager shall approach Impartiality Committee to provide decision on the appeal. The decision on the appeal shall be taken based on the decision by the Impartiality committee. Results of the appeal will be reported to the Board of Directors.
- 4.5.3 ACT shall refer any complaint about a certified client to that client in an appropriate time, based on the nature and severity of the complaint
- 4.5.4 Whenever possible the Systems Quality Manager acknowledges receipt of a complaint
- 4.5.5 In case of a complaint / observation against **African Certification and Testing**, Systems Quality Manager analyses the issue to determine if there is system error or person error. He/She shall determine the root cause and determine correction, corrective and preventive action. The possible complaints are –
- Administration – problems with appointments, certification files, certificates issued or issued late,
 - Evaluators / subcontractor problems with incomplete evaluation or surveillance documentation
 - Agents – problems with general compliance with **African Certification and Testing** administration or evaluation procedures
- 4.5.6 The correction is effected immediately to satisfy the complainant. This may include training / counseling the person involved. The corrective action 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 is sent out to all 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.
- 4.5.7 In case of a complaint / observation against a client, the Systems Quality Manager studies the complaint and discusses with the evaluators (last evaluation). If the complaint is found genuine and valid i.e. indicates a system failure, the complaint is sent to the client for a response. No confidential reports or information will be sent to complainants without written permission from the client. Adequate time is given to the

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client for response. If required, Systems Quality Manager follows-up with the client for the response. Depending on the response, Systems Quality Manager may decide to –

- Write to the complainant about the response and asks for his response.
- Ask further clarification from the client
- Depute evaluators to personally visit the client and investigate for system failure. Such visit shall be considered as special visit and charged to client.
- Request a joint meeting with client, complainant and **African Certification and Testing**

4.5.8 Systems Quality 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 client file for records and the same is passed to evaluators during next evaluation. The details of all complaints and action taken (Corrective Action) are discussed in Management Review and IC meeting.

Notes on complaints raised against ACT and a certified client of ACT:

- For the sake of traceability and clarity, all communications with complainants shall be done per e-mail
- The Systems Quality Manager shall ensure that no discriminatory action is taken against the complainant
- The complaint handling process is subject to the requirements of confidentiality as outlined in ISO/IEC 17065 and ISO/IEC 17021
- Complainants will be provided with progress reports and the outcome resulting from the procedure for corrective and preventive action (QP04) during which the decision is communicated by, or reviewed and approved by individuals not subject to the complaint.
- Should the investigation of a complaint exceed a period of 1 month, the complainant will be updated by means of progress reports, sent per mail, on a monthly basis until the complaint has been satisfactorily resolved.
- Whether possible ACT gives a formal notice of the end of the complaint handling process to the complainant
- ACT shall determine, together with the certified client and the complainant, whether and, if so to what extent, the subject of the complaint and its resolution shall be made public

4.6 Handling of Appeals

Any client, who fails to satisfy an evaluation or surveillance, may appeal against the decision. Where an appeal is received the following procedure will be followed.

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4.6.1 Director(s) will appoint the members of the appeals committee under the leadership of Systems Quality Manager who will hear the appeal and determine the outcome. In case, Systems Quality Manager is part of the evaluation / certification team, System Quality Manager shall decide the investigating officer for the appeals process. In such a scenario Systems Quality Manager shall approach Impartiality Committee to provide decision on the appeal. The decision on the appeal shall be taken based on the decision by the Impartiality committee. Results of the appeal will be reported to the Board of Directors.

- All appeals shall be received by the Systems Quality Manager and details of appeals shall be recorded in the Appeals Register maintained by the Quality Manager. The Systems Quality Manager shall acknowledge receipt of the appeal (for example by e-mail).
- Systems Quality Manager shall investigate the appeal made and inform the client 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 Systems Quality 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 client. This report acts as the progress report and the client will be provided with the formal notice on the result of the appeal.
- 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. The full responsibility still remains with ACT, however, the accreditation body may be asked for advice.
- 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.
- Systems Quality Manager shall ensure that details with respect to the appellant and actions there upon is not shared with the evaluation team members.
- Systems Quality Manager shall ensure that no discriminatory action is taken against the appellant.
- The client is made aware of the appeals process which is available as public information on the ACT website.

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4.6.2 In case of an appeal made by a client against a decision made by evaluators, or certification committee, the appeal shall be recorded by Systems Quality Manager and forwarded to Appeal Subcommittee. Appeal subcommittee shall review the appeal, investigate (which may include discussion with concerned client, respective evaluators / lead evaluators and review of Evaluation report). Appeal subcommittee may also direct any other lead evaluators to visit the site and determine the validity of the appeal. The decision taken by Appeal subcommittee shall be communicated to the client and to Systems Quality Manager for necessary action. The case is also discussed during the next MRM and Impartiality Committee meeting. In special cases, the case may be discussed with Impartiality Committee members on one-to-one basis.

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 Systems Quality Manager. The other source may be internal / external Evaluation.
- Systems Quality Manager studies the suggestion to determine any conflict with ISO/IEC 17065 or ISO/IEC 17021, **African Certification and Testing**. Policy. 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. Systems Quality Manager determines the changes in existing documentation and implements through Document Change process (QP01).
- If any client or interested party asks for the appeal / complaint handling process then it is forwarded to Systems Quality Manager. He/She will inform a client / any other interested party the appeals and complaint handling process of **African Certification and Testing** if any complaints / appeals are received by clients / interested party

4.8 Closing of complaint and appeal

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

4.8.2 Every client complaint and appeal is recorded. The records are maintained by the Quality 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

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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 Systems Quality Manager. Based on analysis of Client / Other interested parties complaint and appeal, necessary actions are taken and client is replied for closing the complaint and appeal. Quality 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 Organization will be closed within 7 working days after receipt of the complaint and appeal. Systems Quality Manager is authorised for closing of complaint and appeal.

4.9 Conflicts of Interest

- 4.9.1 In the case of personnel with a conflict of interest, the relevant personnel shall not be involved in the reviewing or approving of the resolution of a complaint should that personnel have been directly involved with that client within the past 2 years. Direct involvement includes consultancy for that client or direct employment.
- 4.9.2 All ACT personnel shall complete the F12 Annual Confidentiality and Impartiality Declaration, on which any conflict of interest (including prior consultancy or employment with a client) shall be declared. This declaration shall be used by ACT to verify that personnel assigned to review or approve the resolution of a complaint have no conflict of interest with the relevant client, in line with 4.9.1. Where a conflict of interest is identified, the complaint shall be reassigned to another suitably competent ACT personnel member with no such conflict.