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| **.BREGAI** | **BRE Global Assurance (Ireland) Limited Procedure** | Doc No: | XP107 |
| Rev No: | 0.2 |
| Compliments, Complaints and Appeals | | Date: | 9 Apr 2021 |
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***This procedure addresses (in whole or in part) the following clauses:***

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| **Standard:** | **17065** | **17025** | **17020** | **17021** | **17024** | **9001** | **14001** | **27001** | **45001** |
| **Clause:** | 7.13 | 7.9 | 7.5  7.6 | 4.7  9.8  9.9 | 9.8  9.9 | 8.2.1  10.2 | 10.2 | 9 | A9 |

# Purpose / Scope

This document provides mandatory procedures as well as guidance and help on how to handle complaints, compliments and appeals received by any part of the BRE Global Ireland. This document applies to all staff.

In general, *solicited* feedback gained from Customer Satisfaction Surveys, etc. is not included in the scope of this procedure. Exceptions will be made in extreme cases, e.g. it may be beneficial to handle some particularly poor feedback as a Complaint.

# Definitions

## Compliment

Any expression of *satisfaction* made to or about BRE Global Ireland by an external party, related to our products, services, or personnel.

## Complaint

Any expression of dissatisfaction, doubt or disappointment made to or about BRE Global Ireland or BRE Group, related to our products, services, personnel, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected.

Note: It is frequently difficult to determine whether a communication should be categorised as a complaint, particularly for ‘complaints about BRE’. The following general guidance shall be applied:

* Not a Complaint

A communication that is more focussed on working toward a solution than complaining about the lack of a solution.

* Complaint (takes precedence over Not a Complaint guidance)

A communication requesting input from someone other than the usual BRE contact (Group Compliance, Line Manager, etc.).

## Internal Complaint –

Essentially as above, but raised from within BRE Group.

## Information

Borderline cases (not quite a Complaint) may be recorded for Information. No immediate action is taken. However, it may assist with identifying issues.

## Appeal

A request by the provider of:

* the object of conformity assessment (certification); or
* the object that has been tested or assessed;

for reconsideration of a decision made by BRE relating to that object.

# Background

Complaints and compliments are welcome since:

* Compliments highlight where we are doing things right. Good practices can be shared to improve other parts of the business.
* Complaints highlight where there may be opportunities for improvement.
* Complaints and compliments may arise from any of our activities.

Appeals arise only from a decision to refuse or revoke certification (including certification suspension and withdrawal) or a decision related to testing or assessment.

***All complaints shall be immediately brought to the attention of the*** BRE Global Ireland Quality Manager

# Roles and Responsibilities

BRE Global Ireland Quality Manager

The BRE Global Ireland Quality Manager is the complaints-handling management representative for BRE Global Ireland, and will coordinate the following activities.

All complaints shall be copied to:

* The relevant Business Director(s); and
* If the complaint has implications to BRE Group to the Group Director with responsibility for Risk & Compliance.

Complaints making reference to legal action and/or financial compensation shall additionally be copied to the BRE Group Company Secretary.

The BRE Global Ireland Quality Manager is also responsible for:

* The assessment of complaints (consulting others as necessary) in terms of:
  + health and safety implications,
  + severity / impact, and
  + the need for immediate action.
* overseeing the nomination of the investigator / primary contact for each complaint;
* monitoring the progress of complaint investigations.

The BRE Global Ireland Quality Manager shall also monitor the performance of the complaints handling process and report to senior management on a routine basis, including:

* number and nature of complaints received;
* progress with ongoing complaint investigations;
* time to resolve complaints;
* recurrent problems resulting in complaints;
* trends in number or nature of complaints.

## The Investigator

The BRE Global Ireland Quality Manager shall appoint an investigator as follows:

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| --- | --- |
| 1. Complaints about BRE Global Ireland | BRE Global Ireland Quality Manager |
| 1. Complaints about a BRE client | The relevant Business Area |
| 1. Complaints about a 3rd party that is not a BRE client | BRE Global Ireland Quality Manager |
| 1. Complaints about the complaints process itself | BRE Global Ireland Quality Manager |
| 1. Complaints about other BRE Group companies | BRE Group Compliance |

When nominating an Investigator, care shall be taken to avoid Conflicts of Interest. In general terms, the Investigator must be independent of the subject of the complaint and must have been so for a minimum of 2 years. See XP116 Procedure for Managing Impartiality for further guidance.

# Compliments Procedure

Compliments shall be logged in the Feedback Database, and summarised in frequent reports to the business.

# Complaints Procedure

See Figure 1.

Complainants shall be asked to confirm the details of their complaint in writing.

All complaints shall be logged in the appropriate folder in Sharepoint, and all information required for a complaint investigation shall be collected and stored under the unique Feedback reference number (Cnnnn).

All correspondence with the complainant shall include the Feedback reference number (Cnnnn) in the title, and shall be copied to the BRE Global Ireland Quality Manager and stored in the specific Cnnnn folder.

All information received from a complainant, or as a result of a complaint investigation, shall be maintained strictly confidential. Should it become necessary to disclose information, written agreement shall be obtained from the complainant.

Complaints shall be reviewed to confirm that investigation by BRE Global Ireland is appropriate, e.g. Complaint about BRE Global Ireland, about a BRE Global Ireland client, about use of BRE Global Ireland marks or logos, etc.

In general terms, a typical complaint investigation shall have an initial focus on resolving the specific issue – the Correction and, once that has been completed, the complaint can be closed. Where appropriate, the issue shall subsequently be logged in the Improvement Action folder in Sharepoint for further actions including a Root Cause Analysis and Corrective Action.

Complaints about a certified client/product/service shall include consideration of the effectiveness of the certified management system. The BRE Global Ireland Assessment Services provider shall be notified of any specific concerns to be followed up in audits.

Complaints about a certified client/product/service shall include consideration of the requirement for the public sharing of details, e.g. counterfeit certificates/products, etc. There may be circumstances where it is appropriate to discuss this requirement with the certified client and/or the complainant.

Complaints concerning the conformity assessment activities of BRE Global Ireland may be escalated to the Impartiality Committee where considered necessary. The decision to escalate will be taken by BRE Global Ireland’s Managing Director, and consideration will be given to whether:

* the complaint concerns the impartiality of BRE Global Ireland
* the complaint has become stuck, with no resolution in sight
* the complaint has become protracted to the point that considerable involvement from BRE Global Ireland Quality Manager could pose a risk to the impartiality.

# Timescales

Complaints shall be handled in accordance with the following KPI’s, as agreed with top management and the BRE Global Ireland Impartiality Committee. All timescales are with respect to the date that the complaint was received into BRE Global Ireland.

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| **Action** | **Timescale** | **Target** |
| Issue an acknowledgement to the complainant | 2 working days | 90% |
| Issue first significant response to complainant | 10 working days | 80% |
| Close complaint | 60 working days | 70% |

Whilst close attention is paid to the first 2x KPIs, it is acknowledged that the closure of a complaint is frequently influenced by issues outside the control of BRE Global Ireland.

# Figure 1: Complaints Procedure overview



# Appeals

See Figure 2 for general appeals.

Appeals may be made only by the provider of the object of certification, assessment or testing.

The appellant shall lodge an appeal by writing to the BRE Global Ireland Quality Manager, clearly setting out the grounds for the appeal and enclosing a cheque for €300 (alternative payment methods can be arranged). This fee covers the administration cost of opening an appeal and is refundable where the Appeal Panel finds in favour of the Appellant.

The BRE Global Ireland Quality Manager shall inform the relevant Directors of an appeal as soon as it is received.

The appeal shall be reviewed by the BRE Global Ireland Quality Manager. If the situation can be resolved, within 14 working days of receipt, the appeal is terminated and the fee refunded.

Where the appeal is not resolved as described above, the BRE Global Ireland Quality Manager shall inform the Chairman of the Impartiality Committee of the appeal. This marks the commencement of a Formal Appeal.

The Chairman of the Impartiality Committee shall define the constitution of the Appeal Panel. An Appeal Panel shall consist of, at least, 3x members of the Impartiality Committee who have no direct interest in the decision.

The BRE Global Ireland Quality Manager shall arrange an impartial secretarial service to assist the Chairman with arrangements, minutes, and output reports/letters concerning the appeal.

Provisional arrangements shall be made for the Appeal Panel to meet within two months of receipt of the appeal.

The Appellant shall be given not less than 14 days’ notice of the date set for the Appeal Hearing, advised of the constitution of the Appeal Panel, and invited to be present.

The Appellant has the right to state objections to the constitution of the Appeal Panel within 2 working days of receipt of the invitation. Objections shall be considered by the Chairman of the Impartiality Committee and the constitution of the Appeal Panel shall be amended if considered necessary.

The BRE Global Ireland Quality Manager shall prepare a comprehensive information pack containing all that the Appeal Panel will need to consider including, but not limited to, the following:

* The Scheme Document and/or associated Standards
* Relevant Management Systems Procedures
* A timeline, with links to evidence, covering the specifics of the Appeal
* An outline summary of all the above

The information shall be provided to the members of the Appeal Panel in a timescale that permits a thorough review prior to the Appeal Hearing - typically, not less than 14 days before the Appeal Hearing.

The BRE Global Ireland Quality Manager shall ensure that key personnel are available on the day of the Appeal Hearing for interview by the Appeal Panel as may be required. Note that it is highly likely that the Head of Compliance will also be required for interview.

The Appeal Panel shall meet at the agreed time/location, conduct the Appeal Hearing, and reach a decision on whether or not the appeal is upheld. It is very important throughout an appeal that any decision taken is fair, transparent, does not result in any form of discrimination.

The Appellant shall be provided with formal notice of the Appeal Panel’s decision.

# Figure 2: Appeal Procedure overview



# Associated Documents / Systems:

- SharePoint folder

XP102 Control of Records (incl. records retention and disposal)

XP107E Complaints and Appeals Procedure (External)

XP109 Corrective Actions

XP109 Preventive Actions

XP116 Procedure for Managing Impartiality