Procedure for Complaint and Appeal

1.0 Purpose

The purpose of this procedure is to describe the handling of incidents, complaints and appeals received from the clients, in-house, and from other parties.

2.0 Scope

This procedure covers all complaints and appeals received from individuals by any means, like written, verbal, e-mail, etc. It also includes adverse findings during the certification process.

3.0 Responsibility

The Managing Director shall make decisions on complaints and appeals and may appoint independent personnel (those who are not part of certification activity related to the complaint/appeal) to handle the investigations and maintain appropriate records related to complaints and appeals.

3.1 The overall responsibility to execute this procedure is given below.

Activity	Responsibility
Completion and submission of incident report/ records for entry into the Corrective Action System	All staff members of **IMQ GULF**
Incident investigation and analysis	Respective Dept. Manager
Handling of complaints and appeals	As appointed by-Managing director
Review, analysis and decision for closing	Managing Director / Op. Manager/ Quality Manager
Communication of decision on complaint/ appeal to complainant/ appellant	Quality Manager/ Op. Manager
Maintaining records related to complaints & Appeal	Quality Manager

4.0 Description of activity

4.1 Evaluation Incidents

4.1.1 For the purposes of this document “Evaluation incidents” are defined as internal and external complaints, suggestions, observations and opportunities for improvement. Evaluation incident data is entered into the Corrective Action System for proper treatment (IMQG/QP/04). This procedure describes the methodology by which **IMQ GULF** collects and processes incident reports, and communicates the impact to the staff members.

4.1.2 **IMQ GULF** recognizes that incidents occur in daily operation that collectively have an impact on the certification 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 dissatsifaction with **IMQ GULF**. Complaints may be:

- Internal in nature – raised by a staff member of **IMQ GULF,** with regard to internal services, compliance to IMQ Gulf Impartiality norms, operations or employees' performance.
- External in nature – raised by clients of **IMQ GULF**, suppliers or other affiliated organizations.
- Written
- Verbal
- Complaints raised by clients or stakeholders on the services provided.

4.3 Terminology used in this procedure for incidents

The incidents and complaints are considered as any of the following four things, and this procedure describes the system for handling the same.

4.3.1 **Suggestions**

IMQ GULF 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**

IMQ GULF recognizes that the client may have some reservations or may not agree with the conduct of certification personnel, evaluation and audit findings and / or overall interaction with **IMQ GULF** staff. Client is free to communicate the same to **IMQ GULF**.

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**

Opportunites for improvement are incidents where the system has not failed, yet greater operational efficiency may be obtained by analyzing current practices. Opportunites 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 the case of an external source, the incident report may be received by any staff member or Quality Manager. The staff member shall fill the incident report format, recording all the information and details of the complaint. The filled report format shall be submitted to the Quality Manager for further action. In the case of internal sources, the incident report format shall be filled in by the staff member(complainant) and submitted to the Quality Manager.

4.4.2 The decision on the complaint is taken by, or reviewed and approved by, individual(s) not previously involved in the subject or certification activities of the complaint.

4.4.3 Handling of Complaints and Appeals is primarily handled by the Quality Manager. However, it is also ensured that, if the Quality Manager has been involved in the certification activity of a client; he/ she shall not be involved in the review, approval and decision making of the complaint or appeal. For such cases, an independent authority in IMQ Gulf is appointed to handle the activity of complaint/ appeal handling.

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

4.4.5 In case of Complaints and Observations, it may be against **IMQ GULF** (a system / procedure or a person) or **IMQ GULF** certified companies (clients). In case of suggestion / opportunity for improvement, it is for **IMQ GULF** to study the suggestion and decide.

4.4.6 All such incidents received by any means or by anyone is first recorded in the Incident report with the details of:

- Complaint and appeal sr. no.,
- Mode of receipt,
- Received by,
- Name of client / other interested party,
- Description of complaint and appeal,
- Reference of services against which complaint and appeal is raised along with the reference, date and other details.

4.4.7 Clients / other parties' complaints and appeal incident reports are submitted to the Quality Manager to analyze the root cause.

4.4.8 Quality Manager validates the complaint after checking necessary backup records or personal interview of staff members (who were involved in the job).

4.5 Handling of Complaints and Observations

4.5.1 In case of a complaint / observation against **IMQ GULF**, the appointed personnel analyze the issue to determine if there is a system error or any person's error. He determines the root cause as well as correction, corrective and preventive action. The possible complaints are –

- Administration related – it includes problems with appointments, certification files, certificates issued, or late issue of certificate;
- Certification Personnel / subcontractors related – it includes problems with incomplete evaluation, auditing or surveillance documentation;
- Process related – it includes problems with general compliance with **IMQ GULF** administration or certification procedures
- Internal incidents/complaints: it includes issues related to maintenance of impartiality in certification activity, possible conflicts, performance of staff, discrimination, ethics and behavioral, etc.

4.5.2 The correction is implemented immediately to satisfy the complainant. This may include training/ counseling of the people 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 e-mail is sent out to all staff detailing the issue and remedial action (for information). A copy of the complaint and investigation details are maintained in the individual's respective personal file for reference during the performance appraisal.

4.5.3 In case of a complaint/ observation against a client, the appointed personnel study the complaint and discuss it with the certification personnel. If the complaint is found genuine and valid, i.e. it 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 client for response. If required, the appointed personnel follows-up with the client for the response. Depending on the response, he/she may decide to –

- Write to the complainant about the response and ask for his response.
- Ask further clarification from the client
- Depute independent certification personnel to personally visit the client and investigate system failure. Such a visit shall be considered as special visit and may be charged to client.
- Request a joint meeting with client, complainant and **IMQ GULF**.

4.5.4 The appointed personnel 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 certification personnel during next evaluation and audit. The details of all complaints and action taken (Correction, CAPA) are discussed in Management Review and IC meeting.

4.6 Handling of Appeals

Any client who is not satisfied with the outcome of an audit/ evaluation or surveillance may appeal against the decision. Where an appeal is received, the following procedure will be followed.

4.6.1 Managing Director will authorize the members of decision making of Complaint and appeal. In case, the Quality Manager is part of the certification team, an independent member shall be appointed as the investigating officer for the appeals process. In such a scenario, the Managing Director may also approach Impartiality Committee and / or **IMQ GULF** team to provide decision on the appeal. The decision on the appeal shall be taken based on the decision by **IMQ GULF team**. Results of the appeal will be reported to the Managing Director.

- All appeals shall be received by the Quality Manager and details of appeals shall be recorded in the Appeals Register maintained by the Quality Manager.
- The appointed personnel shall investigate the appeal being made and inform the client about its plan of action for investigation and action thereon.
- An investigation report (Incident Report) for each individual appeal shall be maintained by the Quality Manager. In case, any further corrective action is required, post actions shall be identified and taken based on Incident report – Corrective action procedure IMQG/QP/04 is implemented.
- A copy of the investigation report shall be sent to the client.
- In case of any further ambiguity, the same shall be reviewed by the Managing Director and appropriate decision shall be made.
- In case the issue 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.
- Appeals trend and corrective and preventive action taken shall also be reviewed as part of the Management review meeting and Impartiality committee meeting.
- The appointed personnel handling the appeal process shall ensure that details with respect to the appellant and actions thereon are not shared with the certification team members.
- IMQ GULF ensures that no discriminatory action is taken against the appellant.
- The client is made aware of the appeal process, and its details are made available to him on request.

4.6.2 In case of an appeal made by a client against a decision made by certification personnel, the appeal shall be recorded by Quality Manager and forwarded to the Managing Director. The Managing Director shall review the appeal and investigate (which may include discussion with concerned clients, respective evaluators / auditors, certification Manager and review of evaluation/ audit report). It may require the IMQ Gulf investigation team to visit the site and determine the validity of the appeal. The decision taken by the IMQ Gulf investigation team shall be communicated to the client and to the 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 a one–to–one basis.

4.7 Handling of Suggestions / Opportunity for improvement

- In case of suggestions / opportunity for improvement, the source is predominantly internal, and the staff member concerned fills in the incident report format and submits it to the Quality Manager or Operations Manager. The other source may be internal / external members.
- Quality Manager/ Operations Manager studies the suggestion to determine any conflict with ISO/IEC 17065 and ISO/IEC 17021-1 Standard and **IMQ GULF**'s 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 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. Quality Manager determines the changes in existing documentation and implements them through Document Change process (IMQG/QP/01).
- If any client or interested party asks for the appeal / complaint handling process, then the request is forwarded to the Quality Manager/ / Operations Manager. He will inform a client / any other interested party the appeal and complaint handling process of **IMQ GULF**, if any complaints / appeals are received by client/ interested party.

4.8 Closing of complaint and appeal

4.8.1 Depending on the nature of the nonconformity, the appointed personnel may follow up with requests for corrective and preventive actions. When the investigation of client's 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 client's 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 and are identified with the complaint and appeal number and having records of the corresponding corrective or preventive actions. The records of investigations concerning product quality or other test characteristics are maintained by the Certification Manager. Based on analysis of client / other party's 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 complaints and appeals received by **IMQ GULF** shall be closed within 10 working days after receipt of the complaint and appeal.

4.9 Communication with Regulatory bodies

Records of client complaints and appeals including the actions and decisions, and disputes with IMQ GULF shall be retained and promptly communicated to the applicable regulatory body such as ENAS/MOIAT, GSO, SASO, GAC or EIAC.

5.0 References

5.1	IMQG/QP/01	Procedure for control of documents
5.2	IMQG/QP/04	Procedure for corrective and preventive action

6.0 Enclosures Nil

7.0 Formats / Exhibits

7.1	IMQG/F20	Incident Report
7.2	IMQG/F21	Incident Log