

Procedure for Complaint and Appeal

1.0 Purpose

The purpose of this procedure is to describe the process by which **TSL Certification Services International Ltd.** (TSL CSI) handles incidents, complaints and appeals received from its clients, internally and other interested parties.

2.0 Scope

This procedure covers all complaints and appeals received from individuals whether written, verbal, e-mail, adverse findings seen during evaluation/assessment/audit.

3.0 Responsibility

3.1 **The Certification Manager (CM) or authorized designate** is responsible for receiving the complaint and appeal. Management Representative, in consultation with the other authorized TSL CSI's personnel is responsible for handling, validating and analyzing 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 submission of incident report/ records for entry into the Corrective Action System	All staff members of TSL CSI
Incident investigation and analysis	Management Representative /Impartiality Committee
Handling of complaints and appeals and submission to committee	Certification Manager
Review, analysis and decision for closing	Certification Manager

4.0 Description of activity

4.1 Evaluation/Assessment/Audit Incidents

4.1.1 For the purposes of this document "Evaluation/Assessment/Audit incidents" are defined as complaints, suggestions, observations and opportunities for improvement. Evaluation/Assessment/Audit incident data is entered into the Corrective Action System for action (QP04). This procedure describes the methodology by which **TSL CSI** collects and processes incident reports, and communicates the impact to the staff members.

4.1.2 **TSL CSI** recognizes that incidents may 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 dissatisfaction with **TSL CSI**. Complaints may be:

- Internal in nature – raised by a member of **TSL CSI** with regard to internal services, operations or employees' performance.
- External in nature – raised by TSL CSI's clients, suppliers or other affiliated organizations.
- Written
- Verbal

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- Complaints raised by clients, accreditation bodies, scheme owners or other stakeholders

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 same.

4.3.1 Suggestions

TSL CSI 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 in written or verbal form.

4.3.2 Appeals

TSL Certification Services International Ltd. recognizes that the client may have some reservations or may not agree with the conduct of evaluators/assessors/auditors findings, certification committee's decision and / or overall interaction with the staff at **TSL CSI**. In the spirit of openness and transparency clients are encouraged to communicate these or any other feedback to **TSL CSI**.

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 by analyzing current practices. Opportunities for improvement are often collected internally, but input from external sources is also beneficial.

4.4 Receipt of Incidents

4.4.1 An incident may be reported by any means – verbal or written. If from an external source, the incident report may be received by any authorized TSL CSI's staff member. The authorized personnel shall complete the incident report form, recording all the information and details of the complaint. The filled report format shall be submitted to the Management Representative for further action. In case of internal source, the incident report format shall be filled by the staff member and submitted to the Certification Manager or authorized designate.

4.4.2 The Certification Manager shall contact (by telephone, e-mail or letter) the external source to acknowledge the receipt of information within five (5) working days of receipt. This information shall be retrieved directly from the complainant in order to obtain det and first-hand information from the source. (to avoid any error in writing the report). Depending on the gravity and urgency of the complaint TSL CSI may decide to personally meet the initiator.

4.4.3 Should the Complaints and Observations being made is against **TSL CSI** (a system / procedure or a person) or TSL Certification Services International Ltd. certified companies (client). And the outcome is a suggestion / opportunity for improvement, it is for **TSL CSI** to study the merit of these suggestions and make their decisions.

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

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

4.4.5 Clients / other parties' complaints and appeal incident reports are submitted to the Designated Representative for analyzing the root cause.

4.4.6 Manage validates the complaint after checking necessary backup records or personal interview of evaluators/assessors/auditors / staff members (who were involved in the job when complaint/appeal was raised).

4.5 Handling of Complaints and Observations

4.5.1 In the event of a complaint / observation against **TSL CSI**, the Certification Manager or designated Representative analyzes the matter to determine if it was a system error or personnel error. A determination is made to conduct root cause as well as correction, corrective and preventive action. The possible complaints are: –

- Administrative related – it includes problems with appointments/schedules, certification files, certificates issued, or late issue of certificate;
- Evaluators/contractors related – contains errors with incomplete evaluation/assessment/audit or surveillance documentation or late reports beyond the required timelines;
- Agents related – includes problems with general compliance with **TSL CSI's** administration or certification procedures

4.5.2 The correction is conducted immediately to satisfy the complainant. This may include training / counseling with the person(s) involved. The CAPA is discussed with management during next Management Review Meeting (MRM). Appropriate action is taken based on discussions (change in procedure / forms, training to all personnel, etc). The decision is communicated (via e-mail, memo or utilizing any other means of communication) to all staff detailing the incident and remedial action (for information). A copy of the complaint and investigation details is maintained in the respective individual's personal file for reference during the performance appraisal.

4.5.3 In case of a complaint / observation against a client, the Management Representative reviews the complaint and discusses with the evaluators/assessor/auditor (last evaluation/assessment/audit). 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, Certification Manager follows-up with the client for the response and depending on the response may decide to –

- Communicate directly (written) with the complainant regarding the outcome and request a response.
- Request further clarification from the client.
- Send evaluators/assessor/auditor to personally visit the client's facility and investigate the system failure. Such visit shall be considered as 'Special' and will be charged to client.

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- Request a joint meeting with client, complainant and **TSL CSI**.

4.5.4 The CM shall communicate with the complainant at the end of the process, detailing the findings and formally closing the complaint. A copy of the correspondence is retained on the client file for records and will be given to the evaluators/assessors/auditors during next evaluation. The details of all complaints and action taken (Correction, CAPA) are discussed in Management Review and Impartiality Committee meeting.

4.6 Handling of Appeals

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

4.6.1 The Executive Director will appoint the members of the appeals committee. Under the leadership of Executive Director, the committee will hear the appeal and determines the outcome. If the Executive Director is a member of the evaluation / certification team, a decision shall be made regarding nomination of an investigating officer for the appeals process. In this case, the Executive Director shall request that either the Impartiality Committee and / or **TSL CSI** to provide decision on the appeal. The decision on the appeal shall be taken based on the decision by **TSL CSI** committee and the Impartiality committee. Results of the appeal will be reported to the **TSL CSI's** Board Members.

- 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 client about its plan of action for investigation and action.
- 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 shall be identified and taken based on Incident report – Corrective action procedure **QP-04** is implemented.
- A copy of the investigation report shall be sent to the client.
- If further ambiguity is detected, a review by the Board of Directors shall be conducted and an appropriate decision shall be made.
- If the matter remains opened and unresolved TSL CSI shall refer such incident to the accreditation board for its comments/recommendations.
- All appeals made are collated and analyzed on an annual basis.
- Necessary corrective and preventive actions shall be taken based on the appeal trend.
- Appeals trends in addition to corrective and preventive action taken shall also be reviewed as inputs of the Management Committee and Impartiality Committee meetings.
- The Certification Manager shall ensure that details with respect to the appellant and actions thereon are not shared with the evaluation team members.
- The Certification Manager shall ensure that no discriminatory action is taken against the appellant.
- The client is made aware of the appeal process and its details are made available during the contractual process, at the evaluation/assessment/audit and again upon request.

4.6.2 In case of an appeal made by a client against a decision made by evaluators, lead evaluators or certification decision committee, the appeal shall be recorded by Designated authorized Representative and forwarded to the Appeal Committee. The Committee shall review the appeal and investigate (which may include discussion with concerned client, respective evaluators / lead evaluators and review of evaluation report). The Appeal Committee may also send any other lead evaluators to visit the site to determine the validity of the appeal. The decision taken by the Appeal Committee shall be communicated to the

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client and to the CM for necessary action. The case is also discussed during the next MRM and Impartiality Committee meetings. In special cases, the case may also be discussed with Impartiality Committee members on one-to-one basis.

4.7 Handling of Suggestions / Opportunity for improvement

- In instances of suggestion / opportunity for improvement, the source is predominantly internal, and the concerned staff member completes the incident report form and submits it to the CM. Other sources may be from internal / external evaluation/assessments/audits.
- The CM reviews the suggestion to determine any conflict with ISO/IEC 17065 and **TSL CSI's** Policy. If the suggestion is in conflict, TSL CSI communicates this to the initiator. However, the suggestion is also discussed in Management Review. In case the suggestion is found to be not in conflict, the suggestion is evaluated for possible benefits and the impact on other processes.
- The suggestion is accepted on the basis that it may be beneficial and does not adversely impact any other process. The CM determines the changes in existing documentation and implements them through the Document Change process (**QP-02**).
- If any client or interested party enquires about TSL CSI's appeal / complaint handling process the request is forwarded to the CM, who will communicate the appeal and complaint handling process of **TSL CSI's** 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 Designated authorized Representative / Certification Manager 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 authorized personnel shall contact these organizations and provides them with all relevant information.

4.8.2 Every client's complaint and appeal are recorded. The records are maintained by the Certification Manager. When there are copies of written communication, reports and other documents related to a complaint and appeal, these records are organized, filed, and identified with the complaint and appeal number in addition to records of the corresponding corrective or preventive actions. The records of investigations concerning certification services are maintained by Certification Manager. The Certification Manager recommends the need for taking corrective and preventive action to prevent future complaint and appeal, and concerned personnel informed accordingly.

4.8.3 All the complaints and appeals received by **TSL Certification Services International Ltd.** shall be closed within ten (10) working days after receipt of the complaint and appeal. The Certification Manager is authorized personnel for closing of complaint and appeal.

5.0 References

5.1	QP-01	Procedure for control of documents
5.2	QP-04	Procedure for corrective and preventive action
6.0	F-20	Incident Report
7.0	F-21	Incident Log

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