



# ***Complaints and Appeals Management for Certification Services***

*Bureau Veritas Certification Policy - TQR I&F Division*



***Move Forward with Confidence***



## INTRODUCTION

The purpose of this Bureau Veritas Certification policy is to establish a standard and structured process for the management of Complaints and Appeals received by Bureau Veritas Certification. The purpose of this policy is to communicate the standard process to all operations to ensure that all appeals and complaints are handled in a professional and responsible manner.

### 1. Definitions

The definitions used by Bureau Veritas Certification are the following:

#### **Complaint**

(ISO/IEC 17000:2020, 8.7): expression of dissatisfaction, other than appeal (8.6), by any person or organization to a conformity assessment body (4.6) relating to the activities of that body, where a response is expected.

#### **Appeal**

(ISO/IEC 17000:2020, 8.6): request by the person or organization that provides, or that is, the object of conformity assessment (4.2) to a conformity assessment body (4.6) for reconsideration by that body of a decision (7.2) it has made relating to that object.

### 2. Complaints

Common Process Steps

#### **2.1 Receipt and Acknowledgement**

Complaint can be written (Formal Letter, Email, Website) or verbal (Phone Call, Feedback during sales visit or audit). The process of management of the complaints registered in our website is the following:

- The acknowledgment of the complaint is done automatically
- On HO level, the dispatch of the email is done. If this is a complaint, this is transferred to a generic mailbox (groupqhseinbv@bureauveritas.com)
- Then the complaint is transferred to the QHSE manager concerned for investigation and actions.

Complaints are handled at contracting entity level. An audit may be initiated to proceed with investigation, and the client shall be notified with reasons for the audit.

The complaint form and the complaint/appeal process are publicly available in the same languages as the public certification summaries published by Bureau Veritas Certification.

Upon receipt, complaints and appeals are acknowledged to sender within five working days, unless otherwise specified.

The Recipient of the complaint is either the person who received it directly or the one who entered the information. They are assigned to the validator who will determine the severity and decide actions according to this rating

#### **2.2 Responsibility**

Personnel who investigate complaints and appeals are always different from those who carried out the audits and made certification decision, without discrimination against the appellant or complainant.

- If (LTM) Local Technical Manager was involved, then a person, internal and independent, is appointed
- If Local Technical Manager was not involved; he or she can carry out the investigation.

Unless otherwise specified, LTM is the default channel for complaints and appeals.

### 2.3 Resolution process

The resolution process includes the following steps.

- Investigation, and analysis of the situation,
- Structured response (root cause analysis, correction, corrective action) if the severity is rated high
- Implementation of correction and corrective action,
- Information to the client of findings and actions taken,
- Monitoring of results: check if the solution is implemented and effective,
- Record and traceability of documents,
- Follow up on sustainability of results and of resolution.
- The timeframe for resolution is four weeks, unless otherwise specified in appendices. However, this may be affected by responsiveness of the client or other third parties.

Bureau Veritas retains the anonymity of the complainant in relation to the client if this is requested by the complainant and shall treat anonymous complaints and expressions of dissatisfaction that are not substantiated as complaints as stakeholder comments and address these during the next audit.

When the formal investigation and resolution of the complaint cannot be completed within 4 weeks, a progress update of the investigation shall be provided to the complainer until the situation is resolved.

On case-by-case basis, BVC, the Complainant and the Client shall decide if information needs to be made public. There must be formal authorization from Complainant and Client when the decision is to make the complaint public.

Any instances where failure to publicly disclose the complaint could affect other stakeholders, should be made public.

Examples of these instances are complaints about:

- Defects that could have catastrophic consequences (injuries, death, etc.).
- Failures in environmental management systems that could cause severe damage to environment and stakeholders.
- Quality of food products; etc.
- A final written response is provided to the complainant
- Specific complaints and appeals handling procedure are applied for following schemes based on scheme owner requirements and a copy of these can be made available on request from LTM
  - IATF 16949
  - SA8000
  - CDM

## 3. Appeal Process

Appeals are dealt at the level where certification decision making was done (Critical Location, Hub, ICC) and coordinated by Local Technical Manager with concerned Accreditation Manager and CL, Hub, or ICC to maintain impartiality.

Appeals related to QHSE schemes are communicated to CER Accreditation Manager.

PS: for ASC, MSC and FSC, the complainant can refer the complaint to ASI, if the issue has not been resolved through the full implementation of BVCH 's own procedures, in case of disagreement with the conclusions or dissatisfaction by the way BVCH handled the complaint. As the ultimate step, the complaint or appeal may be referred to the scheme owner.

For ASC: email: [complaints@asc-aqua.org](mailto:complaints@asc-aqua.org) - Mailing Address: Aquaculture Stewardship Council, Daalseplein 101, 3511 SX Utrecht, The Netherlands

## Appendix 10 – IFS

All IFS complaints should be handled according to the IFS Annex 4, version 3 of the Framework Agreement:

The appeals shall be finalized within 20 working days of receiving information from the assessed site. A letter confirming receipt of the complaint shall be issued within a maximum of five (5) working days. An initial response shall be given within ten (10) working days of receiving the complaint. A full written response be given after the completion of a full and thorough investigation into the complaint.

For the handling of complaints received by the IFS Offices, the basis for complaint management is described in the IFS Framework Agreement with certification bodies: If the complaint relates to the quality of the content of IFS audits or IFS audit reports, IFS MANAGEMENT will ask the certification body to provide a statement on the cause and the measures introduced to rectify the problem within 2 weeks. If the complaint relates to the quality of IFS Assessments or the content of IFS Assessment reports, the IFS Offices require the certification body to provide a statement on the cause and the measures identified to rectify the problem within two (2) weeks.

If the complaint relates to administrative errors, e.g., in IFS certificates and/ or IFS reports based on typing mistakes or in the IFS database based on an oversight or by accident, IFS MANAGEMENT will ask the certification body to provide a statement and rectify the problem within 1 week. The certification body may ask IFS MANAGEMENT providing an argumentation to extend this period. The statement must be issued in writing by email or post. If the complaint relates to administrative errors, e.g. in IFS Assessment reports, IFS Certificates or in the IFS Database, the IFS Offices ask the certification body to provide a statement and rectify the problem within one week. The statement shall be issued in writing, by e-mail or post.

## Appendix 11 – SEDEX Audits

### Templates – SMETA Appeal form

### 1 Purpose

The purpose of the Appeal Procedure is to provide our Suppliers / Clients with unbiased, fair, and rationally prompt resolution process about the disputes raised by the Supplier / Client during or post the SMETA audit / Sedex Virtual Assessment. The appeal procedure can be made available to clients on request

### 2 Appeal Process Steps

This procedure defines the Appeal process steps for SMETA audits / Sedex Virtual assessments.

- If there is a disagreement between the Site Management and Auditor during the closing meeting on all the non-conformities or any of the non-conformities raised by the Auditor, the site management signs in the dispute box of the CAPR and states their reasons why agreement was not reached with the corresponding non-conformity serial number against which they have a dispute.
- The concerned Technical Reviewer (during the technical review process) would bring such disagreement noted in the CAPR to the attention of Global Social and Customized Audits Manager / Technical Expert (herein after referred as Technical Governance Team).
- Alternatively, in case above process is not followed viz. reason is not mentioned in the dispute box of Signed CAPR by the Site Management, the Supplier / Client can raise objections about any of the non-conformities raised by the Auditor after the Audit is carried out.
- Technical Governance Team would forward Appeal Form to the Auditor. Post Auditor and Supplier incorporates the respective comments in the Appeal Form along with Audit information, the same will be forwarded to the Technical Governance Team for their review.
- Based on the comments made by both parties viz. Auditor and Supplier and the local law / ETI Base Code Requirement in the Appeal form, the duly filled Appeal form is reviewed by the Technical Governance team. In case, there are any clarifications which needs to be sought from the Auditor, the same is being put forward to the

local network country / Auditor prior to arriving at the decision. Post getting the necessary clarifications, appeal decision is being made by the Technical Governance Team as to whether the concerned non-conformities are valid or need to be removed / downgraded to observation.

- The final decision is let known to the Network Country who in turn forwards the same to the Supplier. In case, the NCs are downgraded / removed, the Revised CAPR is being sent to the Supplier through the Network Country / Auditor for their acknowledgment / signature. Revised CAPR shall be uploaded on Sedex Advance platform along with the Audit Report.
- Further, in case, the Final Appeal Decision of the Technical Governance Team is not agreeable to the Supplier, they can raise their grievance to the Sedex Grievance Team. On receiving the grievance, Sedex will get the comments / explanation as to the situation on the day of Audit from both the parties and then take a final decision on the issue raised.

Audit Team will clearly communicate to the Site Management Representatives during the audit that our company has an "Appeals Procedure" in place. Should they or the Client wish to challenge any or all the findings raised during the audit, their appeal would be considered, and the due process would be followed.

### 3 Appeal Handling

The Appeal would be handled by Technical Governance Team who will have no role to play in the audit including auditing / reviewing the report under dispute. Member of the BVCH TQR team responsible for SEDEX scheme would approve the appeal decision and Global Social and Customized Audits Manager would be the back-up in his absence.

In no case, the Appeal decision would be made and approved by the same personnel.

### 4 Timeline for Appeal process

Stage	Action	Timeline
1	Technical Governance Team receives an appeal from the Supplier / Client challenging any or all the findings raised during a said audit	Initiation date
2	Technical Governance Team may request any further clarifications / details from the Auditor with respect to the filled Appeal form. Clarifications would be put across by Auditor within 5 working days of the clarifications being sought by Technical Governance Team	Within 30 calendar days of initiation date.
3	Technical Governance Team will relay the Appeal decision post approval from Member of the BVCH TQR team responsible for SEDEX scheme OR Global Social and Customized Audits Manager to the local network country / Auditor.	Within 30 calendar days of initiation date.

Technical Governance Team shall log all appeals /disputes and records will be duly maintained for future reference.