Complaints Management

1. Aim and objective

The process describes the systematic recording and processing of complaints through the individual stages. Complaints are prioritised and processed in a manner that is appropriate to the individual case being handled.

Professional processing of complaints is key to maintaining customer satisfaction. Containment action mitigates further damage and establishes communication with the complainant while suitable corrective actions are derived from the root cause analysis. The individual stages in the process are an important component of continual improvement.

Complaints management is a component of ISO standards ISO 17020 and ISO 17065.

2. Scope

The process is to be applied to all clients of bio.inspecta AG and q.inspecta GmbH as well as their subsidiaries at the complaints stage. The handling process for appeals is not a component of the complaints management process description. The instruction on legal remedies contained in the inspection or certification report respectively forms the basis of an appeal.

3. Process responsibility

- The Divisions responsible implement the complaints management process.
- The Head of QM draws up process instructions and evaluations to fullfil the requiremts to relevant standards as ISO 17065 cap 7.13.

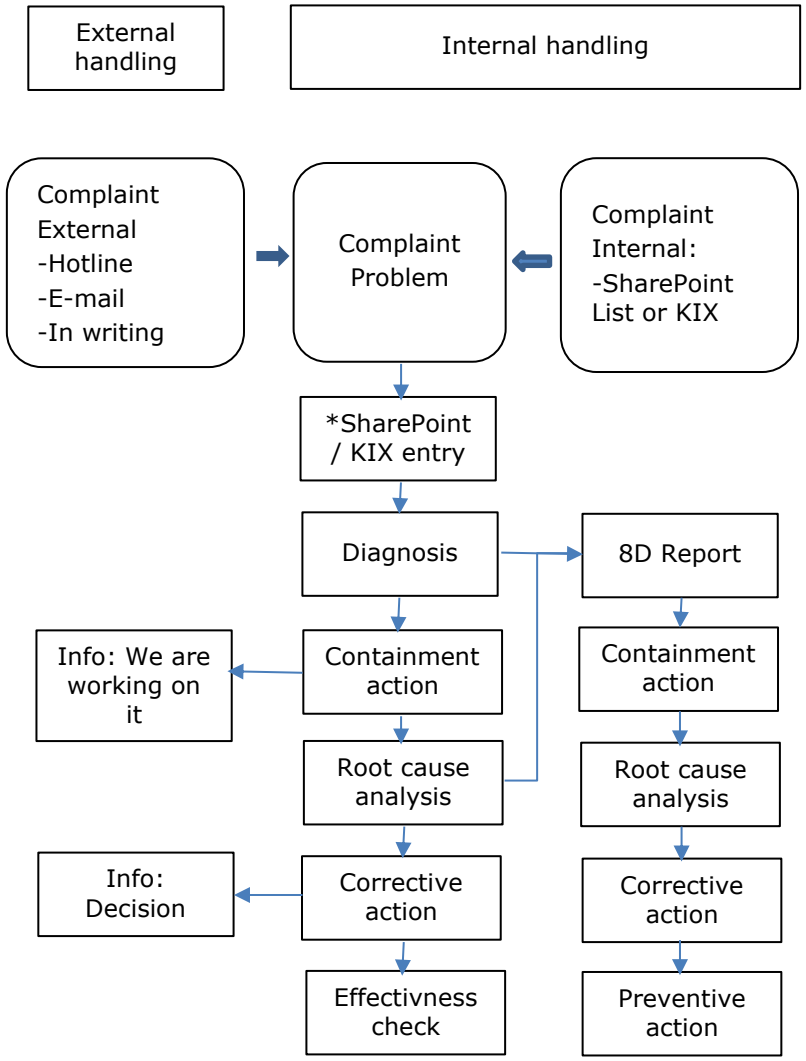
4. Process indicators

- Number of complaints
- 1-1-1 rule for reaction times through to completion (1 day for containment action – 1 week for root cause analysis and corrective action – 1 month for preventive actions)
- Number of 8D Reports created
- Evaluation of complaints by problem category

5. Related documents

- Ecert under client correspondence
- SharePoint List complaints
- KIX-ticketing tool
- 8D Report template
- Divisions' internal PIs (QM documents)

6. Complaints process sequence

Activities	Description / responsibility
	Problem (existing deviation of actual state from target state) Complaint could be internal where client complains to inspector who passes on complaint via internal SP Problem entry. Facts only (target state – actual state) Can I/am I allowed to solve the problem myself? Do I know the root cause? Escalation 8D method (to QM) Feedback to complainant Where necessary, Head of Division must clarify: Why did the problem arise? Is it a constantly recurring problem? Is the root cause critical for us? Correct problem (normally an individual case) Prevent recurrence of problem and eliminate systemic cause.

*The entry can be made directly in the SharePoint list (LTD) or in the ticketing system KIX (AG) or it can be submitted to the Head of Quality Management, using Form 12_066 (language). It is important that all formal and informal complaints, appeals, concerns or objections related to the activities of bi/qi, a certificate holder or a certification applicant are kept in sharepoint or KiX (ISO 17065- 7.13.1).

7. Definition of complaints and appeals, standards

A complaint is always an expression of a complainant's dissatisfaction with the provision of a good or service. At the time of a complaint being made, there must be an immediate reaction so as to contain a complaint's potential impacts and in order to maintain a complainant's satisfaction by establishing contact. Further handling involves the description of the problem (target state v. actual state), the root cause analysis, and the establishment of corrective actions.

ISO 17020 - Chapter 3.9 Appeal
Request by the provider of the item of inspection to the inspection body for reconsideration by that body of a decision it has made relating to that item.

ISO 17020 - Chapter 3.10 Complaint
Expression of dissatisfaction, other than appeal, by any person or organisation to an inspection body, relating
to the activities of that body, where a response is expected.

ISO 17020 – Chapter 7.5 Complaints and appeals - Procedural requirements
7.5.1 The inspection body shall have a documented process to receive, evaluate and make decisions on complaints and appeals.
7.5.2 A description of the handling process for complaints and appeals shall be available to any interested party upon request.
7.5.3 Upon receipt of a complaint, the inspection body shall confirm whether the complaint relates to inspection activities for which it is responsible and, if so, shall deal with it.
7.5.4 The inspection body shall be responsible for all decisions at all levels of the handling process for complaints and appeals.
7.5.5 Investigation and decision on appeals shall not result in any discriminatory actions.

7.1 Differentiation between complaints and appeals at bio.inspecta

Complaints are handled by the Divisions, using KIX-Ticketing tool and for Ltd a SharePoint List "Complaints".
Typical complaints include:

- Incorrect invoicing
- Dissatisfaction with inspection
- Disagreeing with certification decision
- Response time for enquiries, feedback etc. is too long

Appeals are handled in accordance with the definitions set out in the instruction on legal remedies contained in the inspection or certification report respectively.

8. Recording and processing of complaints

The individual Divisions are free to assign tasks, responsibilities and competencies within the Division.
Internal communication should be kept brief and limited to known facts. Under no circumstances should there be any speculation as to why a complaint may have arisen.

8.1 Complaints input

Complaints may reach us in the following ways:

- in writing by post,
- by e-mail (to info address or directly to a member of staff),
- by telephone (hotline, switchboard or directly to a member of staff),
- through social media,
- verbally (for example during an audit).

All correspondence with the complainant is to be filed in Ecert. Additionally, the complaint is to be recorded for processing in the KIX-Ticketing tool and for daughter companies in the SharePoint List under "Complaints". Only the issue at hand (facts) is to be listed in SharePoint (where necessary, reference can be made to the correspondence filed in Ecert). Where a complaint raises more than one issue, each issue is to be recorded as an individual complaint.

Complainants may be clients, authorities, label schemes, third parties etc. Complaints about bio.inspecta clients raised by third parties are also to be recorded in KIX.

8.2 Monitoring the processing status

The Divisions are responsible for processing complaints within set timeframes (1-1-1 rule).
If a complaint is deemed critical, or in case of doubt, the Head of Division is to immediately involve the Head of QM.
The processing of complaints is handled as follows, depending on the topic:

- Technical questions are handled by the hotline
- Personnel questions and financial competence lies with the head of department or his deputy
- Certification decisions are passed on to the head of certification or department in case a certification was done by the head of certification.
- Complaints third parties, also standard holders, are handled by the responsible PM
- General criticism goes to the CEO/QM
- French-speaking Switzerland: all types of complaints unless they concern him or her, or financial issues are handled by the CEO French-speaking Switzerland or the employee in consultation with head of departement
- Complaints in the subsidiaries are handled by the CEO of the subsidiary

When allocating the processing of the complaint, it has to be ensured in all cases that the complaint is not processed by the person directly affected by the complaint. In this case, the case must be passed on to an employee or manager.

8.3 Implementation of containment action

The objective of a containment action is to prevent further damage, to confirm to the complainant that the complaint has been received, and to inform the complainant of the further course of action. In most cases no further damage is to be expected. Monitoring is necessary nonetheless. Examples of situations that could arise: Goods are currently being produced that may potentially be unusable (stop production if necessary). False documents continue to be sent out (put a stop to mailings for the time being).

The complainant must be contacted within **one working day:**

- We confirm that we have received the complaint (we take the issue very seriously indeed, even if we do not agree with the interpretation presented).
- We explain the steps we have already taken with regard to the issue and outline further steps to be taken (Example: The Division in charge is assessing the complaint and will contact you within the next few days.)
- If the containment action resolves the issue to the complainant's satisfaction, the status can be set to "Completed" without the need for any further entries. Where further activities are required, set the status to "an Bereichsleitung (Attention Head of Division)" and "Vearantwortlich Bereichsleitung (Responsibility Head of Division)".

Contact is normally established by telephone, or by email or post if so requested by the complainant. At all times stick to the facts and do not speculate in any way regarding the complaint by passing on information that is unsubstantiated or outside of your area of competence (e.g. "I'm sure the invoice will be corrected.")

9. Determination of root causes, corrective action

If, following the completion of the containment action, the matter is passed on to the Head of Division, the HoD is in charge of determining why the issue has occurred and what corrective action is to be taken. The HoD coordinates the assessment internally, i.e. with other units within the organisation, decides on the corrective measure to be taken, and contacts the complainant within one week to inform her/him of the corrective measure to be taken. If the corrective measure has not yet been decided upon, the HoD contacts the complainant and informs her/him on the current status and planned steps.

Where the root cause of a complaint may result in further adverse impacts on bio.inspecta which it is essential to examine more closely, the HoD must initialise an escalation to the Process 8D Method and inform the Head of QM.

9.1. Complaint information to related operators

Complaint of operators shall be respected for the future activities (i.e. preparation for audits). Therefore, it needs to be checked if a Pop-up in Ecert for a better transparence is required. Is no value of a Pop-up visible, no Pop-up need to be created.

9.2. Information an Labelgeber

Several label owner require an inforamtion in case of complaints and appeals for the relevant service. In the Share Point Liste under «Betroffene Label» (affected label) label owners which require a information are listed. The PM is to inform and responsible for contact the label owner.

10. Implementation of 8D Report

Where prompted by the HoD, the Head of QM takes over the further coordination and conducts a systematic investigation by means of an 8D Report. The process, including the definition of preventive measures aimed at the systematic elimination of root causes and prevention of recurrence, is to be completed within a period of **one month**.

10.1. Effectiveness check

The QM department does a monthly effectiveness check over the closed complaints in the Share Point list. The target is to detect repeated complaints in there systematic and the definition of preventive actions. Moreover, the corrective action shall be check case by case if they are adequate and if required to do additional action.

10.2. Controlling

The head of Quality control and report the required process parameter to the management board.

11. Impartiality and confidentiality

This section is to serve as a reminder that:

- no confidential information whatsoever (see Process 12_030) must be released to a complainant or a third-party (this is especially pertinent when it comes to complaints made against third parties);
- there must not be a conflict of interest with regard to the complaint in question (for example, where a complainant is dissatisfied with an inspector). Where a member of staff who is handling a complaint notes that a conflict of interest exists s/he must immediately notify this fact using the "Conflicts of interest 1000001" form and pass the case on to another member of staff.

12. Label specific guidelines

12.1 ASC-CAR-7.7.

In case of an objection, the product manager is called in via the procedure 25_010, so that the ASC specific requirements are incorporated.

Complaints for ASC are entered in the Share Point list of bi Pty Ltd as described in chapter 8.1. An independent member of the bio.inspecta/ q.inspecta management is responsible for handling complaints and reports to top management. Bi/qi is responsible for appeals related to certification activities.

For normal complaints and appeals bi/qi is responsible. However in case the complaint process escalates beyond the authority of bio.inspecta AG/q.inspecta GmbH the ASC appointed accreditation body and ASC can be engaged. In this case, the complainant can submit his or her concerns directly to ASC via the e-mail address disputes@asc-aqua.org. For further information see http://www.accreditation-services.com/dispute-management/complaints

The information from the list for ASC must be transferred annually to ASC's FORM 4 form for complaints and sent to ASC and ASI 30 days before the annual audit.

The FORM 4 form is also used for reporting in the event of suspension or withdrawal of ASC accreditation and is sent to ASI and ASC no later than the end date of accreditation.

12.2 MSC

Complaints are recorded in the Share Point list of bi Pty Ltd "Complaints" descriped in ca. 8.1.