

Quality Procedure

No.	QP07
Revision No.	1
Date	4-1-2020

Procedure For Complaint and Appeal

1.0 Purpose

The purpose of this procedure is to describe handling of incident, complaint and appeals received from the candidate / certified person, in house and from other parties.

2.0 Scope

This procedure covers all complaint and appeal received at Individuals by any means, like written, verbal, e-mail etc. It also includes adverse findings during examination.

3.0 Responsibility

3.1 **Certification Director** is responsible for receiving the complaint and appeal from the candidate / certified persons / other parties. They in consultation with the office staff and examiners / invigilators are responsible for handling, validating and analysis of the complaint and appeal to the satisfaction of the candidate / certified persons / other parties.

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

Activity	Responsibility
Completion and submittal of incident report records for entry into the Corrective Action System	All V2 Consulting Limited staff members
Incident investigation and analysis	Certification Manager
Handling of Appeala and Submission to Appeal subcommittee ^{Note} (for appeals)	Certification Director
Appeal review, analysis and decision	Appeal Subcommittee Note

Note: Refer to Appendix 1 for the Constitution, terms of Reference and Method of Working for the ICP Appeals Subcommittee.

4.0 Description of activity

4.1 Examination Incidents

- 4.1.1 For the purposes of this document "Examination incidents" are defined as complaints, suggestions, observations and opportunities for improvement. Examination incidents data is entered into the Corrective Action System for proper treatment (QP04). This procedure describes the methodology by which V2 Consulting Limited collects and processes incident reports; and communicates the impact to staff members.
- 4.1.2 V2 Consulting Limited recognizes that incidents occur in daily operation that collectively have an impact on the examination process. In order to properly analyze and address system issues a consistent and thorough process for collection of information is vital.

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4.2 Complaints

Complaints are incidents of grievance or dissatsifaction with V2 Consulting Limited . Complaints may be:

- internal in nature raised by a V2 Consulting Limited staff member with regard to internal service, operations or employee performance
- external in nature-raised by V2 Consulting Limited candidate / certified persons, suppliers or other affiliated organizations
- written
- verbal
- complaints raised by candidate / certified person's or stake holders

4.3 Terminology used in this procedure for incidents

The incidents and complaints are considered as any of the below 4 things and procedure describes the system for handling the same.

4.3.1 Suggestions

V2 Consulting Limited 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

V2 Consulting Limited recognizes that the candidate / certified person may have some reservations or may not agree with the conduct of examiners / invigilators, Examination findings, certification committee decision and / or overall interaction with V2 Consulting Limited staff. Candidate / certified person is free to communicate the same to V2 Consulting Limited , Appeal subcommittee and this is treated as an appeal from the candidate / certified person.

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 in analyzing current practice. Opportunites for Improvement are often collected internally, but input from external sources is also beneficial.

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4.4 Receipt of Incidents

- 4.4.1 The incident may be reported by any means verbal or written. In case of an external source, the incident report may be received by any staff member. The staff member shall fill the Incident report recording all the information and details of the complaint. The filled report shall be submitted to Certification Director for further action. In case of internal source, the incident report shall be filled by the staff member and submit to Certification Director.
- 4.4.2 Certification Director shall contact (telephone, email, letter) the external source to acknowledge the receipt of information within 14 working days of receipt. He shall understand the issue in details from the source (to avoid any error in writing the report). He may decide to personally meet the initiator, depending on the severity and seriousness of issue.
- 4.4.3 In case of Complaints and Observations, it may be against V2 Consulting Limited. (a system / procedure or a person) or a V2 Consulting Limited candidate or certified person. In case of suggestion / opportunity for improvement, it is for V2 Consulting Limited **to** study the suggestion and decide.
- 4.4.4 All such incidents received by any means or by any one is first of all recorded in the Incident report with the details of;
 - Complaint and appeal Sr. No.,
 - Mode of receipt,
 - Received by.
 - Name of candidate / certified person / other parties,
 - Description of complaint and appeal,
 - Reference of services against, which complaint and appeal is raised alongwith the reference ,date and other details.
- 4.4.5 Candidate / certified person / other parties' complaint and appeal incident report are issued to the Certification Director for analysing the root cause.
- 4.4.6 Certification Director validates the complaint after checking necessary back—up records or personal interview of examiners / invigilators / staff members (who were involved in to job).

4.5 Handling of Candidate / certified person Complaint and Observations

- 4.5.1 In case of a complaint / observation against V2 Consulting Limited, Certification Director analyses the issue to determine if there is system error or person error. He shall determine the root cause and determine correction, corrective and preventive action. The possible complaints are
 - Administration problems with appointments, certification files, certificates issued or issued late,

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- Examiners / invigilators / subcontractor problems with incomplete Examination or surveillance documentation
- AEC problems with general compliance with V2 Consulting Limited administration or Examination procedures
- 4.5.2 The correction is effected immediately to satisfy the complainant. This may include training / counseling the person 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 email is sent out to all staff detailing the issue and remedial action (for information). A copy of the complaint and investigation details is maintained in the respective individual's personnel file for reference at the performance appraisals.
- 4.5.3 In case of a complaint / observation against a candidate / certified person, the Certification Director studies the complaint and discusses with the examiners / invigilators (last Examination). If the complaint is found genuine and valid i.e. indicates a system failure, the complaint is sent to the candidate / certified person for a response. No confidential reports or information will be sent to complainants without written permission from the candidate / certified person. Adequate time is given to the candidate / certified person for response. If required, Certification Director follows up with the candidate / certified person for the response. Depending on the response, Certification Director may decide to
 - Write to the complainant about the response and asks for his response.
 - Ask further clarification from the candidate / certified person
 - Depute an examiners / invigilators to personally visit the candidate / certified person and investigate for system failure. Such visit shall be considered as special visit and charged to candidate / certified person.
 - Certification Director shall ensure that the complainant submitting the complaint receives progress report related to the complaint being reviewed.
- 4.5.4 Request a joint meeting with candidate / certified person, complainant and V2 Consulting Limited. Certification Director 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 candidate / certified person file for records and the same is passed to examiners / invigilators during next Examination. The details of all complaints and action taken (Correction, CAPA) are discussed in Management Review and IC meeting.

4.6 Handling of Appeals

Any candidate or certified person, who fails to satisfy an examination or surveillance, may appeal against the decision. Where an appeal is received the following procedure will be followed.

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- 4.6.1 Certification Director will endeavor to deal with appeals without recourse to committee. Where this is not possible, or where the appellant insists, the matter will be put before a properly constituted appeal subcommittee.
 - 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 candidate / certified person about its plan of action for investigation and action there upon.
 - 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 identified and taken based on Incident report – Corrective action procedure QP04 is implemented.
 - A copy of the investigation report shall be sent to the candidate / certified person.
 - In case of any further ambiguity, the same shall be reviewed by the CMC and appropriate decision arrived at.
 - In case the issue still 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.
 - Appeal trends and corrective and preventive action taken shall also be reviewed as part
 of the Management committee meeting and Impartiality committee meeting.
 - Certification Manager shall ensure that details with respect to the appellant and actions there upon is not shared with the Examination team members.
 - Certification Manager shall ensure that no discriminatory action is taken against the appellant.
 - The candidate / certified person is made aware of the appeals process and is available to him on request.
- In case of an appeal made by a candidate / certified person against a decision made by examiners, invigilators or certification committee, the appeal shall be recorded by Certification Director and forwarded to Appeal Subcommittee. Appeal subcommittee shall review the appeal, investigate (which may include discussion with concerned candidate / certified person, respective examiners or invigilators and review of Examination report). Appeal subcommittee may also direct any other examiners or invigilators to visit the site and determine the validity of the appeal. The decision taken by Appeal subcommittee shall be communicated to the candidate / certified person and to Certification Director for necessary action. The case is also discussed during the next MRM and Certification Management Committee meeting. In special cases, the case may be discussed with Certification Management Committee members on one—to—one basis.

4.7 Handling of Suggestions / Opportunity for improvement

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- In case of suggestion / opportunity for improvement, the source is predominantly internal and the concerned staff member fills the incident report and submits to Certification Director. The other source may be internal / external Examination.
- Certification Director studies the suggestion to determine any conflict with ISO/IEC 17024, V2 Consulting Limited 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 found 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. Certification Director determines the changes in existing documentation and implements through Document Change process (QP01).
- If any candidate / certified person or interested party asks for the appeal / complaint handling process then it is forwarded to Certification Director. He will inform a candidate / certified person / any other interested party the appeals and complaint handling process of V2 Consulting Limited. if any complaints / appeals are received by candidate / certified persons / interested party

4.8 Closing of complaint and appeal

- 4.8.1 Depending on the nature of the non-conformity, the Certification Director / Certification Manager may follow up with requests for corrective and preventive actions. When the investigation of candidate / certified person 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 candidate / certified person complaint and appeal is recorded. The records are maintained by the Certification Director or Certification 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 also having records of the corresponding corrective or preventive actions. The records of investigations that concern product quality or other test characteristics are maintained by Certification Manager. Based on analysis of Candidate / certified person / Other Parties complaint and appeal, necessary actions are taken and candidate / certified person is replied for closing the complaint and appeal. Certification Director 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 complaint and appeal received by Organization will be closed within 42 working days after receipt of the complaint and appeal. Certification Manager is authorised for closing of complaint and appeal.

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5.1 QP01 Procedure for control of documents

5.2 QP04 Procedure for corrective and Preventive action

6.0 Enclosures Nil

7.0 Formats / Exhibits

7.1 F20 Incident Report7.2 F21 Incident log

7.3 F27 Complaints and Appeals

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APPENDIX 1

ICP Appeals Subcommittee

1. Constitution

- 1.1 The ICP Appeal Subcommittee shall be constituted of not less than three ordinary members including the Certification Manager, a member of the ICP Management Committee and one other to be concerned solely with the interests of the complainant or appellant. At least one member of the Subcommittee will have technical expertise relevant to the complaint or appeal under consideration, e.g., for a complaint or appeal concerning an ICP UT Level 2 certificate holder, the Subcommittee will include a member with experience in UT Level 2 or higher.
- 1.2 No person having a direct interest in the complaint or appeal shall serve on the Subcommittee. One of the Certification Management Committee members will chair the meeting of the Subcommittee.

2. Terms of reference

The Subcommittee will be responsible to the ICP Certification Management Committee for assessing individual cases of complaint or appeal.

3. Method of Working

- 3.1 The Head of Certification Services Division will gather all necessary information from the parties concerned in order that the case can be fully assessed by the Subcommittee.
- 3.2 Subcommittee shall be convened by the Head of Certification Services Division within 42 days of receipt of a complaint; a scheduled ICP Management Committee meeting could be used to facilitate such a meeting.

Note: If an appeal or complaint is urgent, the Head of Certification Services Division has the authority to convene a Subcommittee as soon as the appropriate information is gathered.

3.3 The Subcommittee shall take into consideration all of the material submitted when reaching a decision. Where the Subcommittee is able to reach a unanimous decision, the Head of Certification Services Division will implement the decision and submit a brief report of the

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circumstances and decision to the next meeting of the ICP Certification Management Committee.

5.0 If the decision of the Subcommittee is not unanimous, it shall be referred to the next ordinary meeting of the ICP Certification Management Committee whom shall either make a decision by a majority of 75% of attending voting members.

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