



COMPLAINTS AND APPEALS

ISO	17021-1:2015	9.7-8
	17065:2012	7.13
	14065:2013	9, 10
UNFCCC	CDM ACC. STD V7	14

Revision	Comment on the changes	Review	Approval	Date
3.16	Added Appendix 8 - RSPO	J Tang	CER MS Committee	September 4, 2020
3.15	Definitions and clarification on records	F Boigelot	CER MS Committee	July 7, 2020
3.14	FSC: additional document created (FSC Complaint notification) to officially close a complaint – ASC: reference to ASI for any appeal or disputes – Appendix 7 for MSC	E Gruber	S Ter-Horst	June 18, 2020
3.13	Update of Appendix 5- Aerospace further to UKAS finding	P Firth	S ter-Horst	June 5, 2020
3.12	Complaints procedure (QESIS management) for Climate Change added in Appendix 1	S Pednekar	S ter-Horst	August 23, 2019
3.11	Update of Appendix 3 on IATF.	S.Tuffanelli	Sebastiaan ter-Horst	August 6, 2019
3.10	In § 1 wording “Complaints and Appeals Management” Policy” replaced by wording “This Complaints and Appeals Procedure”	M Timkin	CER MS Committee	February 22, 2019
3.9	Update of CDM Accreditation Standard version number from 6 into 7	R.Sharma	F. Joly	January 2, 2019
3.8	Clarification of responsibilities for QESIS management of complaints and appeals	F. Boigelot	F. Joly de Bresillon	October 8, 2018
3.7	2 points updated on IATF procedure for Appeals.	A. Mihalova	F. Joly de Bresillon	April 23, 2018
3.6	Complaints managed by BV Certification on-line form	E Gruber	P. Jeanmart	March 15, 2018
3.5	Further clarification on when make a complaint public on § 4.2	F. Gomes	F. Joly-de-Brésillon	March 07, 2018
3.4	QESIS replaces IAM	M. Picouleau	F. Joly-de-Brésillon	February 14, 2018
3.3	FSC: Modification of responsibilities in case of complaints - Precision on FSC appeals management	E Gruber	F. Joly-de-Brésillon	February 13, 2018
3.2	Copy of Dispute procedure shall be made available to the client on request added in Climate Change dispute process	R.Sharma	P. Jeanmart	January 24, 2018
3.1	Appendix 6 added (specific rules for ASC schemes)	E Gruber	P. Jeanmart	January 3, 2018
3.0	Revision in Disputes as per CDM Acc Standard requirements	F. Joly	P. Jeanmart	Nov 15, 2017
2.0	Details added when a complaint concerns a scheme managed by a Hub organization (§2.2) – NC ASI 46175	E Gruber	P. Jeanmart	May 17, 2017
1.8	Replaced ISO/TS 16949 by IATF 16949 and Rules 4th by Rules 5th Removed IATF complaints process to align with generic process requirements.	A. Mihalova	P. Jeanmart	February 23, 2017
1.7	“CER Global Accreditation Manager” replaces “Technical Direction” Added reference to template for Complaints registration (§2.1)	R. Sharma	P. Jeanmart	February 10, 2017
1.6	Removed mandatory recording of complaints in IAM tool in §2.1	S. Reemers	P. Jeanmart	January 17, 2017

1.5	Added link to website complaints and appeals policy "CER Technical Director" replaced by "CER Accreditation Manager" Amended Appendix 4 FSC: replace Global Coordinator by FSC Technical Expert, §2 and 3 Amended Appendix 2 – SA8000 services to include references to SAAS Procedure 201A:2015	S. Reemers	P. Jeanmart	December 19, 2016
1.3	Added instructions for Aerospace Series – Appendix 5	T. Douce	P. Jeanmart	May 30, 2016
1.2	Updated instructions for ISO TS 16949	A. Mihalova	P. Jeanmart	April 27, 2016



Website > About Us > Our business > Certification > About Us
Bureau Veritas Certification Policy > Customer Appeals and Complaints Management
<http://www.bureauveritas.com/home/about-us/our-business/certification/about-us/default/about-us-content>
<http://www.bureauveritas.com/home/about-us/our-business/certification/about-us/complaints-management>

CER MS > Procedure "Confidentiality"



Bureau Veritas Website <http://www.bureauveritas.com>



Complaints Register?

Template

Notification complaint and appeal (for FSC, MSC and ASC)

1 Scope

This procedure defines how to manage complaints and appeals, received from customers and other external bodies, to ensure they are handled in a professional and timely manner.

A review of appeal and complaint process is done during annual Management Review.

This Complaints and Appeals Procedure is public and available for external people on Bureau Veritas websites, translated in local language for local websites.

The appendices define additional instructions for the following products:

- Appendix 1 - Climate Change disputes
- Appendix 2 - SA8000 Services
- Appendix 3 - IATF 16949
- Appendix 4 - FSC Services
- Appendix 5 – Aerospace
- Appendix 6 – ASC Farm
- Appendix 7 – MSC
- Appendix 8 - RSPO

2 Definitions

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

3 Common process for both complaints and appeals

Acknowledgement and Record

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

- They shall be recorded in QESIS; 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 (see corrective actions section for details).

For complaint and appeal received from a complainant or appellant, which is not a BVC client, due consideration shall be given whether it is appropriate to answer, taking into account potential liability. In such cases, content of the answer is coordinated with client.

This process is subject to requirements for confidentiality.

Responsibility

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

- If LTM was involved, then a person, internal and independent, shall be appointed
- If LTM was not involved; he or she can carry out the investigation.
- If an appeal concerns one scheme managed by an ICC/Hub, the investigation must be conducted by ICC/Hub, in cooperation with the Head-office and the local country.

Unless otherwise specified in appendices, LTM is the default channel for complaints and appeals. CER Accreditation Manager is notified depending upon severity and is responsible for Complaints/received at I&F TQR. For Complaints/Appeals received at SSC, it is managed by the Accreditation support manager.

Accreditation Managers are informed of complaints related to their product, and shall make sure specific requirements are met.

In case of a critical risk (possible litigation, insurance declaration, court summons, loss of image, accreditation) the complaint is transferred to regional or I&F Division legal contact.

Resolution process

The resolution process includes the following steps.

- Investigation, including business impacts and analysis of the situation,
- Structured response (root cause analysis, correction, corrective action), if the severity is rated high (see corrective actions)
- 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.

The closure timeframe in QESIS for CAPA associated to high severity rating is 90 days, after which escalation process is started.

For all complaints received from an Accreditation Body or a Scheme Owner on an Accreditation held by BVCH SAS or BVCH SAS UK Branch, the effectiveness of corrective actions has to be verified at the next internal audit (not by sampling)

Some products require additional instructions, defined in appendices.

4 Appeal process

Appeals are dealt at the level where decision making was done (Critical Location, Hub, ICC).

Appeals related to QHSE schemes are communicated to CER Accreditation Manager, and included in the preparation of BVCH Impartiality meeting.

See appendices for specific Appeal Panels.

5 Complaint process

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.

Timeframe

An initial response shall be made to the complainant within five working days, unless another specific timeframe is defined in Appendices.

Responsibilities

Certification Manager is responsible overall for the effective management of the complaint and shall

- Consider customer feedback
- Take vital role for the corrective action

Local Technical Manager (LTM) is the main person involved in the resolution of the complaint and shall

- Consider customer feedback and initiate corrective action for the complaint
- Record and maintain the customer complaint in QESIS with full evidence of acknowledgment and also final response to the complainant
- Take vital role for the corrective action
- Communicate the action taken to complainant, if not previously involved in the subject of the complaint.
- Ensure the effectiveness and timely manner of customer complaint process

All sector specific databases shall be updated with necessary records in stipulated timeframe.

On case-by-case basis, BVC, the Complainant and the Client shall decide if information needs to be made public. There has to 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.

The decision on making the complaint public or not shall be recorded.

Appendix 1 - Climate Change disputes

CDM accreditation standard, Version 07.0, 14.2

1 Disputes

A dispute is a disagreement between a DOE and a client, regarding the DOE recommendation, and / or decisions made.

. The procedure consists of the following steps:

- Acknowledgment receipt is sent to the disputant
- Upon receipt LTM gathers and verifies necessary information in order to evaluate validity of the dispute,
- LTM investigates and decides what actions are to be taken
- Results of investigations are communicated to the disputant in an appropriate time.
- Appropriate correction and corrective action shall be taken.

Persons engaged in the disputes handling process are different from those who carried out the validation, verification or certification activities.

Disputes and subject of disputes shall be kept confidential.

In case the appellant is not satisfied with the appeals panel decision, appellant has the option of making a complaint to the concerned accreditation body.

Copy of Dispute procedure shall be made available to the client on request

Complaints related to Climate Change, received from a customer, certification body, or an auditor for CDM/GS/VCS activity are recorded in QESIS with the respective country product manager being the primary contact and CDM Quality Manager as an additional contact.

2 Legal records

BV India Legal Department maintains a record of judicial processes pending against BV India , as well as information of any judicial cases held in the past.

If the subject matter of a judicial process pending, or instituted against BV India, is such that it is incompatible with its functions as a DOE, BV India shall promptly report the matter to UNFCCC secretariat.

Appendix 2 – SA8000 Services

SAAS Procedure 201A:2015

In addition to the company's system to redress complaints, BV and SAAS headquarters provide two additional levels where workers or interested parties can file complaints.

Auditors shall confirm that workers and other interested parties understand and have access to all hierarchy levels of the complaints and appeals process, and that workers are trained in how to use that access.

1 Company Level

Complaints can be filed directly with the factory in question, and may be resolved without the involvement of third party auditors. SA8000 companies are required to establish a complaint procedure that provides workers the option to file a complaint anonymously. Companies are encouraged to establish suggestion boxes or a free mail-in system to facilitate workers expressing their concerns. These complainants shall be able to lodge a complaint anonymously. If names are given, no repercussions shall result. This may encourage an internal discussion and resolution prior to, or instead of, a formal complaint.

The company's Social Accountability Manager shall ensure there is a confidential, accessible and free system for workers to lodge complaints or appeals regarding the company's conformance to SA8000. Also, the corrective Action taken to rectify the complaint shall be communicated to the workers filing the complaint or, in cases of anonymous complaints, to the worker-elected SA8000 representative. In companies where a trade union is present, trade union representatives shall be involved in the complaint processing and settlement procedures.

In some cases, workers may feel the need to take their complaint to the certification body. Such cases include situations where: a) the complaint resolution is not satisfactory to workers; or b) workers feel too intimidated to lodge a complaint directly with management.

2 Bureau Veritas Level

If the company's complaint hierarchy does not satisfactorily address and resolve complaints, workers have access to the appeals procedure, enabling them to bring an appeal before local certification entity that verified the company's compliance with SA8000. Workers' ability to file an appeal shall not rely on their meeting auditors during surveillance visits.

The mechanism for receiving complaints and appeals from workers and interested parties is described also in the General Condition of Services. The following information is given to client and other interested parties:

- address, phone , fax, e-mail of local certification entity
- time for BV reply and action: 30 days

The auditor shall verify that this mechanism and information are known to workers and other interested parties, during SA8000 audits. Local certification entity investigates and sends records of verification details to ICC.

Interested parties including workers unions, trade unions and NGOs can appeal the decision to certify a facility, if it presents objective evidence of serious violation of any element of SA8000.

For example: a community group with evidence that workers are being fired for unionizing could appeal against the company's certification by contacting BVC that approved the certification.

BVC local office records the complaints/appeal, investigates and sends the details to ICC for further actions, (if any) are warranted. ICC may decide to conduct unannounced audits and/or off-site interviews with workers to assess the situation in a more objective way.

All such complaints are dealt as defined in the SAAS procedure 201A:2015 Clause No. 1.13.1

3 SAAS - Accreditation level

Any interested party can also file a complaint or appeal with SAAS about accreditation of Bureau Veritas. The complainant however, shall first seek to exhaust the complaints and appeals process at the company and certification body levels.

All such complaints will be dealt as defined in the SAAS Procedure 201A:2015 Clause No. 1.13.2 and 1.13.3

Appendix 3 - IATF 16949

IATF Automotive certification scheme for IATF 16949, 5th Edition, 2.9

Appeal decision shall be done by the Appeal Panel with involvement of Global Product Manager, an independently assigned POV or Technical advisor and CER Technical Director.

For unusual cases, the Appeal committee will ask another independent POV to challenge the Appeal committee decision and in case of any remaining doubt, a clarification is asked to IAOB. Timing if a major nonconformity is appealed, BVC appeal committee to meet within 10 days to provide first feedback to the client.

- Appeal Panel reviews the case, to make a decision based on appeals and reports submitted by Technical Manager
- Appeal Panel decision is communicated to appellant. It shall be noted that this decision is absolute and final.

The submission, investigation and decision on appeals do not result in any discriminatory actions against the appellant.

Upon request, BVC can inform the appellant that he or she can question decision of Appeal Panel, by raising same appeal to Accreditation Body.

Appendix 4 – FSC Services

1 Filing

The FSC global procedure for the management of complaint and appeal is available on BV HO Website, in English, and several additional languages.

Any FSC complaints and appeals can be recorded on-line by using the link designed for that purpose. The local countries can also have on their own websites another way to record any complaint or appeal received, but the link to the BV HO complaint management has to be mentioned.

FSC Complaints and appeals are acknowledged to sender within two weeks. Initial response to the client includes a proposed course of action, within two weeks. Information is sent to the complainant(s) regarding evaluation the complaint and or appeal.

2 Responsibility

Timeframe for resolution of both complaints and appeals is three months.

FSC	Complaint	Appeal
Contact client	LTM	FSC Hub Manager
Registration	LTM	I&F TQR – Forestry
Decision	LTM	I&F TQR FSC Technical Expert
Support	FSC Hub Manager	I&F TQR – Forestry, FSC Hub Manager and LTM

The owner of the compliant has to upload any record generated by the resolution of the complaint (email with the complainant, internal email).

The monitoring of all the FSC complaints and appeals is made by I&F TQR accreditation manager.

3 Discrimination

The submission, investigation and decision on appeals and complaints shall not induce any discriminatory actions against the complainant or appellant.

4 End of the process

The owner of the compliant shall send a final answer to the complainant, using the form Notification letter, and the complainant is invited to refer it to FSC or ASI in case of appeal.

1 Complaints

Complaints related to Aerospace certification scheme, coming from a customer, certification body, OASIS feedback or an auditor, for Aerospace activity are recorded in QESIS with the ICC Operations Manager being the primary contact and International Aerospace Business Director as an additional contact.

The procedure shall ensure:

- All requests for corrective action are responded to within 30 calendar days from receipt of complaint if response requested, the response is provided within 30 calendar days from receipt of complaint by the accredited entity;
- If the CB determines that a short notice audit is necessary, this audit shall be completed within 90 calendar days from receipt of the complaint; and
- An effective corrective action process that provides for containment activities, conformance to the applicable standard is re-established, completion of root cause analysis, corrective actions addressing all root causes, and a completion date for the implementation of all corrective actions is defined. The CB shall be responsible for the resolution of all complaints. Complaints that cannot be resolved by the CB shall be referred to the AB.

2 Appeals

An Appeal decision shall be made by the Independent Appeal Panel/individual specifically agreed to deal with the appeal with the support and involvement of the ICC Operations Manager. The person conducting the appeal must be an independently assigned POV or Technical advisor and CER Global Accreditation Manager. For unusual cases, the Appeal committee will ask another independent POV to challenge the Appeal committee decision and in case of any remaining doubt, a clarification is asked to IAOB. Timing if a major nonconformity is appealed, BVC appeal committee to meet within 5 days to provide first feedback to the client.

- Appeal Panel reviews the case, to make a decision based on appeals and reports submitted by ICC Operations Manager
- Appeal Panel decision is communicated to appellant. It shall be noted that this decision is absolute and final.

The submission, investigation and decision on appeals do not result in any discriminatory actions against the appellant.

Upon request, BVC can inform the appellant that he or she can question decision of Appeal Panel, by raising same appeal to Accreditation Body.

3 Timeframe

Requests for corrective action are responded to within 30 calendar days from receipt of complaint.

If response to feedback is requested, the response is provided within 30 calendar days from receipt of complaint.

If a short notice audit is necessary, this audit shall be completed within 90 calendar days from receipt of the complaint.

Appendix 6 – ASC Farm

ASC Certification and accreditation V2.2

All formal and informal complaints, appeals, concerns or objections related to BV ASC Farm activities, a certificate holder or a certification applicant are kept on file and logged in QESIS.

4 Complaints

The complaint is managed by the BV entity, and if necessary by the Hub manager, or the accreditation manager.

BVC encourages the complainants to submit copies of their complaints to directly to the ASC at:

- Email: disputes@asc-aqua.org
- Mailing Address: P.O. Box 19107 - 3501 DC Utrecht - The Netherlands
- Office Address: HNK Utrecht Centraal, Arthur van Schendelstraat 650 - 3511 MJ Utrecht - The Netherlands

5 Appeals

An Appeal decision is managed by the hub manager, or the accreditation manager if needed.

6 End of the process

The owner of the complaint shall send a final answer to the complainant, using the form Notification complaint and appeal, and the complainant is invited to refer it to ASC or ASC appointed accreditation body in case of appeal.

The monitoring of all the ASC complaints and appeals is made by I&F TQR accreditation manager.

7 Submission during the annual surveillance assessment

The complaints and appeals are logged on form 4. This form is submitted annually no less than 30 days prior to the annual surveillance by the ASC appointed accreditation body's visit, with copies sent to the ASC.

8 Suspension or withdrawal of BVC ASC accreditation

In this case, all logged issues are sent to the ASC appointed accreditation body and ASC as part of the suspension or withdrawal process using FORM 4 no later than the final date of accreditation.

1 Complaints and appeal acknowledgement

Within 10 working days of receiving a complaint or an appeal, BV will provide an initial response to the complainant or appellant, including an outline of the proposed course of action to follow up on the complaint or appeal. BV will keep the complainant or appellant informed of progress in evaluating the complaint or appeal until it is closed.

BV will investigate the allegations and specify all proposed actions in response to the complainant or appellant within 3 months of receiving the complaint or appeal.

2 End of the process

The owner of the complaint shall send a final answer to the complainant, using the form Notification complaint and appeal, and the complainant is invited to refer it to MSC or MSC appointed accreditation body in case of appeal.

In cases where the subject of the complaint or appeal is also being considered through an objections process, this 3-month timeline may be deferred until completion of the objection process.

The monitoring of all the MSC complaints and appeals is made by I&F TQR accreditation manager.

1. Bureau Veritas Impartiality Committee for RSPO

1.1 Bureau Veritas National Office may, whenever relevant, consult or refer the formal complaint to Bureau Veritas' Impartiality Committee for RSPO, such as complaints related to conflict of interest, Bureau Veritas' independence, etc.

1.2 The Committee shall be informed of the complaint and of all the steps taken by Bureau Veritas to resolve the complaint as well as the response provided by the affected stakeholder.

1.3 Bureau Veritas Impartiality Committee will review all the information provided and will make a proposal to the affected Bureau Veritas National Office on how to resolve the dispute.

1.4 Bureau Veritas National Office shall report to the Committee on the outcome once the dispute has been resolved or of any action taken to resolve the dispute.

2. Responding to a formal complaint or grievance

2.1 Once the formal complaint has been investigated, the CER Director or CER Manager from the relevant Bureau Veritas national Office shall respond to the complaint or grievance indicating whenever relevant and appropriate the preventive and/or corrective measures that will be implemented to address the issue raised.

2.2 For all the formal complaints, grievance or disputes received, the relevant Bureau Veritas Certification National Office shall handle the complaint within 60 days of receiving the formal complaint.

2.3 Whenever a complaint cannot be resolved within 60 days, Bureau Veritas shall inform the RSPO Secretariat, including information as to why the complaint cannot be resolved within an appropriate time frame.

3. Referring a formal complaint to RSPO

3.1 A certified operation has the right to raise a formal complaint with RSPO or directly to the RSPO Executive Board, in line with RSPO Grievance Procedure, if it is not satisfied with Bureau Veritas Certification's final response.

4. Recording a formal complaint or grievance

4.1 All formal complaints or grievances received shall be recorded together with all the steps taken to resolve the complaint and all communication with interested and/or directly affected parties. Records shall be kept in Bureau Veritas Qesis system.

5. Appeals

5.1 An appeal may only be made by a client of Bureau Veritas for RSPO certification against a RSPO certification decision made by Bureau Veritas Certification.

5.2 An appeal raised by a client of Bureau Veritas for RSPO certification against a RSPO certification decision made by Bureau Veritas Certification may only be related to:

- Refusal by Bureau Veritas Certification to proceed with an RSPO audit.
- Disagreement with a nonconformity raised by Bureau Veritas Certification during an RSPO audit.
- Changes in scope of RSPO certification proposed by Bureau Veritas Certification.
- A decision to reduce, suspend or terminate the RSPO certification of the certified operation.

5.3 The grounds for an appeal are limited to:

- An appeal based on the fact that Bureau Veritas Certification has not followed its own procedures for RSPO certification or RSPO certification requirements; or

- An appeal based on the fact that Bureau Veritas Certification has incorrectly interpreted the RSPO certification requirements.

5.4 Notifications of appeal shall be received by the Director or Manager of the relevant Bureau Veritas Certification National Office within 30 days of the relevant RSPO certification decision being received by the certified operation.

5.5 The Director or Manager of the relevant Bureau Veritas Certification National Office shall review and respond to an appeal within 60 days of receiving the appeal. In its response, Bureau Veritas Certification shall clearly indicate whether the original decision is maintained or whether based on the elements presented in the appeal that the initial decision has been modified to take into account any new and relevant information provided.

5.6 A certified operation has the right to raise an appeal with RSPO or directly to the RSPO Executive Board, in line with RSPO Grievance Procedure, if it is not satisfied with Bureau Veritas Certification's final response.