

Procedure for Complaints and Appeals

1.0 Purpose

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

2.0 Scope

This procedure covers all incidents, complaints and appeals received by Management Representative, by means, like written, e-mail etc. from candidate / certified person, in house and from other parties. It also includes adverse findings during examination.

3.0 Responsibility

3.1 **Management Representative** is responsible for receiving the complaint and appeal from the candidate / certified persons / other parties and forwards it to Appeal committee. Appeal committee is 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 submission of incident report records for entry into the Corrective Action System	Management Representative
Incident investigation	Management Representative
Handling of Appeal and Submission to Appeal Committee (for complaints and appeals)	Management Representative
Complaints and Appeal review, analysis and decision	Appeal Committee

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 handling (QP_04). This procedure describes the methodology by which **National Certification Board** collects and processes incident reports; and communicates the impact to all concerned related to them.

4.1.2 **National Certification Board** 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.

4.2 Complaints

Complaints are incidents of grievance or dissatisfaction with **National Certification Board**. Complaints may be:

- internal in nature – raised by a **National Certification Board** member with regard to internal service, operations or employee performance
- external in nature—raised by candidates / certified persons, or other affiliated organizations

4.3 Terminology used in this procedure for incidents

The incidents and complaints are categorized in to the following four categories. Procedure for handling the same is described below.

4.3.1 Suggestions

National Certification Board recognizes that positive feedback is as important as negative ones. Suggestions are vital in identifying preventive action and system improvement. As with complaints, suggestions may be internal or external in nature.

4.3.2 Appeals

National Certification Board recognizes that the candidate / certified person may have some reservations or may not agree with the conduct of examiners, examination findings, appeals committee decision and / or overall interaction with **National Certification Board** personnel. Candidate / certified person is free to communicate the same to **National Certification Board** 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

Opportunities for Improvement are incidents where the system has not failed, yet greater operational efficiency may be obtained in 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 MR fills the Incident report recording all the information and details of the complaint. Management Representative contacts (telephone, email, letter) to the external source to acknowledge the receipt of information within 7 working days of receipt. He/She may decide to personally meet the initiator, depending on the gravity and seriousness of issue.

4.4.2 All such incidents received by any means or by any one is first recorded in the Incident report with the details of;

- Complaint and Appeal Sr. No.,
- Mode of receipt,
- Received by,
- Name of the candidate / certified person / other parties,
- Description of complaint and appeal,
- Reference of services against, which complaint and appeal is raised along with the reference, date and other details,

4.4.3 Candidate / certified person / other parties' complaint and appeal incident report are issued to the Appeal Committee for root cause analysing.

4.4.4 Appeal Committee validates the complaint after checking necessary back-up records or personal interview of examiners / invigilators / staff members (who were involved in the job).

4.5 Handling of Candidate / certified person Complaint and Observations

4.5.1 In case of a complaint / observation against **National Certification Board**, Appeal Committee analyses the issue to determine if there is system error or individual's error. Appeal Committee determines the root cause and determine correction, corrective and preventive actions. The possible complaints are –

- Administration – problems with appointments, certification files, certificates issued or issued late,
- Problems of Examiners with incomplete examination or surveillance documentation
- Problems with general compliance with **National Certification Board** administration or examination procedures

4.5.2 The correction is effected immediately to satisfy the complainant. This may include training / counselling for the person involved. The CAPA is discussed with management during next Management Review Committee meeting. Appropriate action is taken based on discussions (change in procedure / formats, training to all personnel etc). An email is sent out to all concerned 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.

4.5.3 In case of a complaint / observation against a candidate / certified person, the Appeal Committee studies the complaint and discusses with the examiners (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 the response. If required, Appeal Committee follows up with the candidate / certified person for the response. Depending on the response, Appeal Committee may decide to –

- Write to the complainant about the response and asks for his/her response.

- Ask further clarification from the candidate / certified person
- Depute an examiner to personally visit the candidate / certified person and investigate for system failure. Such visit shall be considered as special visit.
- Request a joint meeting with candidate / certified person, complainant and **National Certification Board representative**

4.5.4 Management Representative communicates 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 during next examination. The details of all complaints and action taken (Correction, CAPA) are discussed in IC meeting and Management Review Committee meeting.

4.6 Handling of Appeals

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

4.6.1 Appeal Committee hears the appeal and determine the outcome. Results of the appeal are reported to the Chairman, NCB.

- All appeals are received by the Management Representative and details of appeals are recorded in the Appeals Register maintained by the Management Representative.
- Appeal Committee investigates the appeal 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 is maintained by the Management Representative. In case, any further corrective action is required post actions are identified and taken based on the Incident report – Corrective action procedure QP_04 is followed.
- 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 Chairman, NCB and appropriate decision arrived at.
- All appeals made are collated and analysed on a yearly basis by Management Review Committee.
- Necessary corrective and preventive actions shall be taken based on the appeal trend.
- Appeal trends and corrective and preventive action taken is reviewed in the Management committee meeting.
- Chairman, NCB ensures that no discriminatory action is taken against the appellent.

4.6.2 The candidate / certified person is made aware of the appeals process. In case of an appeal made by a candidate / certified person against a decision made by examiners, Controller of Examination the appeal is recorded by Management Representative and forwarded to Appeal Committee. Appeal Committee reviews the appeal and

investigate, which may include discussion with concerned candidate / certified person, respective examiner and review of Examination report. Appeal Committee may also direct any other examiners to visit the site and determine the validity of the appeal. The decision taken by Appeal Committee is communicated to the candidate / certified person and to Management Representative for necessary action. The case is also discussed during the next MRM and Impartiality Committee meeting. In special cases, the case may be discussed with Impartiality Committee members on one-to-one basis.

4.7 Handling of Suggestions / Opportunity for improvement

- Management Representative studies the suggestion to determine any conflict with ISO/IEC 17024, **National Certification Board Policy**. In case the suggestion is in conflict, the receipt is communicated to the initiator. However, the suggestion is also discussed in Management Review Committee meeting. 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. Management Representative determines the changes in existing documentation and implements after review by Document Review Committee through Document Change process (QP_01).
- If any candidate / certified person or interested party asks for the appeal / complaint handling process then it is forwarded by Management Representative. He / She informs a candidate / certified person / any other interested party about the appeals and complaint handling process of **National Certification Board**.

4.8 Closing of complaint and appeal

4.8.1 Depending on the nature of the non-conformity, the Management Representative 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 Management Representative provides them with all relevant information.

4.8.2 Every complaint and appeal is recorded. The records are maintained by the Management Representative. 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 having records of the corresponding corrective or preventive actions. The records of investigations that concern product quality or other test characteristics are maintained by Management Representative. Based on analysis of candidate / certified person / other party's complaint and appeal, necessary actions are taken and candidate / certified person is replied for closing the complaint and appeal. Management Representative 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 Management Representative closes the complaints and appeals.