1.0 Purpose

The purpose of this procedure is to describe handling of incidents, complaints and appeals received from the clients, in-house, and from other parties.

2.0 Scope

This procedure covers all complaints and appeals received from individuals by any means, like written, verbal, e-mail, etc. It also includes adverse findings during evaluation.

3.0 Responsibility

3.1 **Quality Manager** is responsible for receiving the complaint and appeal from the client / other interested parties. Quality Manager and Technical Manager, in consultation with the office staff and evaluators is responsible for handling, validating and analysis of the complaint and appeal to the satisfaction of the clients / other interested 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	All staff members **of ASTC-TI**
Incident investigation, and analysis Handling of complaints	Quality Manager
Handling of complaints and appeals and submission to committee	Technical Manager
Review, analysis and decision for closing	Technical Manager Quality Manager

4.0 Description of Activity

4.1 Evaluation Incidents

4.1.1 For the purposes of this document “Evaluation incidents” are defined as complaints, suggestions, observations and opportunities for improvement. Evaluation incident data is entered into the Corrective Action System for proper treatment (SP04). This procedure describes the methodology by which ASTC collects and processes incident reports, and communicates the impact to the staff members.

4.1.2 ASTC-TI recognizes that incidents occur in daily operation that collectively have an impact on the evaluation process. In order to properly analyze and address system issues, a consistent and thorough process for collection of information is vital.

4.2 Terminology used in this procedure for incidents

The incidents and complaints are considered as any of the following five situations, and this procedure describes the system for handling the same.

4.2.1 Appeals

Appeals refers to any client's (a person or organization) disapproval towards all decisions made by the ASTC-TI in relation to the certification process.

4.2.2 Complaints

Expression of dissatisfaction, other than appeal, by any person or organization to ASTC-TI, relating to the activities of that body, where a response is expected. Complaints may be:

- Internal in nature – raised by a staff member of ASTC-TI with regard to internal services, operations or employees' performance.
- External in nature – raised by clients of ASTC-TI, suppliers or other affiliated organizations.
- It could be in a Written or Verbal form.
- Complaints raised by clients or stakeholders.

4.2.3 Suggestions

ASTC-TI 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.

4.2.4 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.

Opportunities for Improvement

Opportunities for improvement are incidents where the system has not failed, yet greater operational efficiency may be obtained by analyzing current practices. Opportunities for improvement are often collected internally, but input from external sources is also beneficial.

4.3 Receipt of Incidents

4.3.1 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 format, recording all the information and details of the complaint. The filled report format shall be submitted to the Quality Manager for further action. In case of internal source, the incident report format shall be filled by the staff member and submitted to the Quality Manager.

4.3.2 Quality Manager shall contact (by telephone, e-mail, letter) the external source to acknowledge the receipt of information within 5 working days of receipt. He shall understand the issue in detail from the source (to avoid any error in writing the report). He may decide to personally meet the initiator, depending on the gravity and seriousness of issue.

4.3.3 In case of Complaints and Observations, it may be against ASTC-TI (a system / procedure or a person) or ASTC-TI certified companies (client). In case of suggestion / opportunity for improvement, it is for ASTC-TI to study the suggestion and decide.

4.3.4 All such incidents received by any means or by anyone 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 client / other interested party,
- Description of complaint and appeal,
- Reference of services against which complaint and appeal is raised along with the reference, date and other details.

4.3.5 Clients / other parties' complaints and appeal incident reports are submitted to the Quality Manager for analyzing the root cause.

4.3.6 Quality Manager validates the complaint after checking necessary backup records or personal interview of evaluators / staff members (who were involved in the job).

4.4 Handling of Complaints and Observations

4.4.1 In case of a complaint / observation against ASTC-TI. Quality Manager analyzes the issue to determine if there is a system error or any person's error. He determines the root cause as well as correction, corrective and preventive action. The possible complaints are –

- Administration related – it includes problems with appointments, certification files, certificates issued, or late issue of certificate;
- Evaluators / subcontractors related – it includes problems with incomplete evaluation or surveillance documentation;
- Agents related – it includes problems with general compliance with ASTC-TI administration or Evaluation procedures.

4.4.2 The correction is effected immediately to satisfy the complainant. This may include training / counseling of 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 e-mail 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 personal file for reference during the performance appraisal.

4.4.3 In case of a complaint / observation against a client, the Quality Manager studies the complaint and discusses with the evaluators (last evaluation). If the complaint is found genuine and valid, i.e. it indicates a system failure, the complaint is sent to the client for a response. No confidential reports or information will be sent to complainants without written permission from the client. Adequate time is given to the client for response. If required, Quality Manager follows-up with the client for the response. Depending on the response, Quality Manager may decide to –

- Write to the complainant about the response and ask for his response.
- Ask further clarification from the client
- Depute evaluators to personally visit the client and investigate for system failure. Such visit shall be considered as special visit and charged to client.
- Request a joint meeting with client, complainant and ASTC-TI.

4.4.4 Quality Manager 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 client file for records, and the same is passed to evaluators during next evaluation. The details of all complaints and action taken (Correction, CAPA) are discussed in Management Review and IC meeting.

4.5 Handling of Appeals

Any client may appeal against the certification decision. Where an appeal is received, the following procedure will be followed.

4.5.1 Composition, duties, terms of reference, authority and competence of the committee

General Manager will appoint the members of the appeals committee. The appeal committee consists of General Manager, Technical Manager and one technical personal. The Appeal Committee will identify and select the technical expert panel members based on the technical needs of the appeal, they have the requisite knowledge in the subject area of the appeal.

Technical Manager has the responsibility for ensuring the process outlined in the present procedure is actioned and the appeal is dealt a timely manner. In case Technical Manager was involved in the original activity in question in relation to which the appeal was filed, he or she will not be involved in the appeal resolution process, the deputy and the like down the line will execute the appeal process.

4.5.2 The appeal can be raised within 30 days by the appellant from the date of notification served to the claimant regarding the Certification Decision or Evaluation Decision. If no appeal is received within this timeframe the decision becomes final. Appeals received after the 30-day appeals period will be identified as" rejected" and closed, and the complaint become declined.

4.5.3 Under the leadership of General manager, the committee will hear the appeal and determine the outcome. In case, General Manager is part of the evaluation / certification team, he shall decide the investigating officer for the appeals process. In such a scenario, General manager shall approach Impartiality Committee and/or ASTC-TI team to provide decision on the appeal. The decision on the appeal shall be taken based on the decision made by ASTC-TI team and the Impartiality Committee. Results of the appeal will be reported to the Board of Directors.

- All appeals shall be received by the Technical Manager and details of appeals shall be recorded in the Appeals Register maintained by the Technical Manager.
- Technical Manager shall investigate the appeal made and inform the client about its plan of action for investigation and action thereon.
- An investigation report (Incident Report) for each individual appeal shall be maintained by the Technical Manager. In case, any further corrective action is required, post actions shall be identified and taken based on Incident report – Corrective action procedure SP04 is implemented.
- A copy of the investigation report shall be sent to the client.
- In case of any further ambiguity, the same shall be reviewed by the Board of Directors and appropriate decision shall be arrived at.
- In case the issue still remains open; the same shall be intimated to the accreditation board for its valuable comments.

- Appeal must be reviewed and a final determination made within approximately 15 calendar days of received appeal. The appealed certification decision shall remain effective pending the conclusion of the appeal process.
- All appeals made are collated and analyzed on a yearly basis.
- Necessary corrective and preventive actions shall be taken based on the appeal trend.
- Appeals trend and corrective and preventive action taken shall also be reviewed as part of the Management committee meeting and Impartiality committee meeting.
- Technical Manager shall ensure that details with respect to the appellant and actions thereon are not shared with the evaluation team members.
- Technical Manager shall ensure that no discriminatory action is taken against the appellant.
- The client is made aware of the appeal process and its details are made available to him on request.
- An appeal can be withdrawn at any time until an appeal decision is issued. When an appeal is withdrawn, ANAB will not accept a future appeal on the same decision.

4.5.4 In case of an appeal made by a client against a decision made by evaluators, lead evaluators, the appeal shall be recorded by Quality Manager and forwarded to the Appeal Subcommittee. The Appeal Subcommittee shall review the appeal, and investigate (which may include discussion with concerned client, respective evaluators / lead evaluators and review of evaluation report). The Appeal Subcommittee may also direct any other lead evaluators to visit the site and determine the validity of the appeal. The decision taken by the Appeal Subcommittee shall be communicated to the client and to Quality Manager 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.

Quality Manager shall communicate with the appellant, at the end of the process, detailing the findings and to formally close the appeal.

4.6 Handling of Suggestions / Opportunity for improvement

- In case of suggestion / opportunity for improvement, the source is predominantly internal and the concerned staff member fills the incident report format and submits it to the Quality Manager. The other source may be internal / external evaluation.
- Quality Manager studies the suggestion to determine any conflict with ISO/IEC 17065 Standard and ASTC-TI 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. Quality Manager determines the changes in existing documentation and implements them through Document Change process (SP01).
- If any client or interested party asks for the appeal/ complaint handling process then the request is forwarded to the Quality Manager / Technical Manager. He will inform a client / any other interested party the appeal and complaint handling process of ASTC-TI if any complaints / appeals are received by client/ interested party.

4.7 Closing of complaint and appeal

4.7.1 Depending on the nature of the nonconformity, the Quality Manager / Technical Manager may follow-up with requests for corrective and preventive actions. When the investigation of client's complaint and appeal determines that remote operation or other external organizations contributed to the complaint and appeal, the Technical Manager or his delegate contacts these organizations and provides them with all relevant information.

4.7.2 Every client's complaint and appeal is recorded. The records are maintained by the Quality Manager / Technical 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 concerning product quality or other test characteristics are maintained by Technical Manager. Based on analysis of client / other party's complaint and appeal, necessary actions are taken and client is replied for closing the complaint and appeal. Quality Manager identifies need for taking corrective and preventive action to prevent such complaint and appeal in future, and accordingly concerned person is informed.

4.7.3 All the complaints and appeals received by ASTC-TI shall be closed within 7 working days after receipt of the complaint and appeal. Technical Manager and Quality Manger is authorized for closing of complaint and appeal.

5.0 Related documents and formats

F18 Incident Report

F19 Incident Log