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OPERATING PROCEDURE

COMPLAINTS



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1. OBJECTIVE

To review and resolve client complaints and to take whatever action is required to prevent a recurrence of that deficiency.

2. SCOPE

The scope of this procedure shall cover the following:

- i) Receipt of formal complaints from GCL International Assessment Pvt Ltd (GCL) registered clients/applicants;
- ii) Receipt of a formal complaint from a user of the GCL registered client.
- iii) Receipt of a formal complaint from a trade body, agency or accreditation body.
- iv) Receipt of verbal complaints and anonymous complaints

3. RESPONSIBILITIES

Director

- Shall be responsible for ensuring that all Impartiality Committee members have access to GCL-PORTAL.
- Shall ensure that review of complaints is put on the agenda for all Impartiality Committee Meetings and Management Review Meetings.
- Shall be responsible for verifying the effectiveness of the corrective action taken through review of Internal Audit Reports and information on the GCL-PORTAL system.
- Shall ensure that the co-ordination of all complaints is in accordance with the procedure identified within this document.
- Shall ensure that all complaints are closed-out in a reasonable time period.
- Shall ensure that all service complaint records requiring action are completed, specifying corrective action taken to bring about a satisfactory conclusion to the complaint.

All Personnel (All Offices)

- Shall ensure that all complaints received are put directly into the GCL-Portal system.
- Shall be responsible for recording complaints in the GCL-PORTAL system.

4. METHOD

General System



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- All complaints received by any person will be recorded into GCL-PORTAL-GIS (Global Improvement System). This log of complaints is one centralised log. All offices can see all the complaints in the system not only the ones that relate to their region/territory.
- The procedure for complaints has been published on the public area of the GCL web site. There is
 also a form on the public area where clients, their personnel, interested parties... can complete a
 complaint. All complaints from the web site come direct to the Director for logging in GCL-PORTALGIS.
- The GCL Scheme rules which are given to all clients with the quotations/contract also show the procedures for complaints.

Complaints against GCL Personnel

GCL shall deal with complaints to GCL. A formal procedure shall be used to record all complaints received and shall specify the investigation route, the method by which the complaints are dealt with and shall detail how to implement corrective action to eliminate the cause.

Complaints Received by GCL Registered Clients

- GCL shall require that as part of their documented System, the GCL Client maintains a record of all customer or other complaints.
- GCL shall require that, where a supplier has recorded customer complaints, evidence of action taken to deal with the complaints is made available to the assessment team.

Complaints Received by GCL about Registered Clients

Complaints received by GCL from a user of GCL's Client or organisation's products and/or services will be recorded and investigated. This may be done immediately or during the next planned annual Visit, this shall be at the discretion of the Director.

Note for all complaints: complaints raised via the GCL website are automatically distributed to the following personnel:

- Director
- Chair of the IC

Recording Complaints

- On receipt of a complaint the recipient shall enter it into GCL-PORTAL-GIS (Global Improvement System). The system itself allocates a number for tracking purposes. The source and description of the complaints are forced fields and therefore have to be completed. When the complaint has been submitted, GIS send an auto-email to the Director, so that he is aware of it. The Director logs into GCL-PORTAL to review the complaint.
- The complainant is sent an email within 5 working days of receipt of the complaint by the Director, this is recorded in GCL-PORTAL and that the complaint is being investigated. The outcome of the complaint shall also be recorded on the same portal



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Investigating Complaints

The Director (or designated person) shall investigate all complaints. The record of the investigation in coordination with the office who received the complaint will be recorded by the Director.

Corrective/Preventive Action

- After the investigation has been complete and the root cause has been determined corrective
 action/preventive will be determined and recorded within the GCL-PORTAL system. The information
 on all complaints will be viewable by all GCL offices as corrective action may apply outside of the
 office that received the complaint.
- The complainant will be informed of the outcome of the complaint and of any corrective/preventive action that has been taken if the complaint is deemed justified from the investigation.
- The report shall be written so as not to breach the confidentiality agreement in effect and shall be issued within 10 days of the rendering of the decision.
- GIS will be updated to show that a communication has taken place with the complainant.

Corrective Action/Preventive Verification

- The Director shall be responsible for verifying the completion of the corrective/preventive action taken, and update GCL-PORTAL.
- The Impartiality Committee and Management Review Members shall review the all complaints raised within GCL-PORTAL as well as a report on any trends to ascertain:
 - i) The continued effectiveness of the corrective actions since the last meeting.
 - ii) The repetitive nature of subsequent complaints.
- The output of the Impartiality Committee and Management Review shall demonstrate that all complaints
 have been dealt with and that any corrective/preventive action that was required as a result of the
 complaint have been effectively implemented.

Monitoring Corrective/Preventive Action

All corrective action taken shall be monitored by the internal auditor during the scheduled audits. Monitoring shall be conducted until the deficiency has been eliminated or reduced to a pre-determined acceptable level.

Communicating the outcome of the investigation

• A member of senior management (who have not been involved in the complaint and have not partaken in the investigation) shall be appointed by the <u>Director</u> to review the investigation findings and any



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recommendations. These personnel shall be responsible for communicating the outcome of the investigation and subsequent decision to the complainant.

• Throughout the investigation and the outcome of the complaint, the IC shall be kept informed of all progress.