

SOP 11 Complaints, Appeals and Feedback Process Mérieux NutriSciences Certification LLC

Document Name	SOP 11_Complaints and Client Feedback		
Document Type	<input checked="" type="checkbox"/> Standard Operating Procedure <input type="checkbox"/> Guidance Document <input type="checkbox"/> Work Instruction		
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Revised By	Anmarie Schwanke	Approved By	Tom Spoden
Countries	Global		
Date of Issue	5/25/22	Version	12
Distribution	<input type="checkbox"/> All Staff <input type="checkbox"/> Auditors <input type="checkbox"/> Program Managers/ Schedulers <input type="checkbox"/> Technical <input type="checkbox"/> Administration <input type="checkbox"/> Sales and Marketing		

1.0 Purpose

To describe the procedure for handling and resolving complaints/challenges/appeals and analysing records for trends.

2.0 Scope

This SOP is to be used across all MNCert offices in response to a complaint, challenge or appeal.

3.0 Definitions

Term	Definition
Complaint	<p>Concerns submitted by a client or other party regarding:</p> <ul style="list-style-type: none"> • Fault with a Company report or service; • Unsatisfactory turn-around time; • Unsatisfactory behaviour of staff; • Poor communication by the Company; • Non-adherence by the Company to written procedures agreed to with the client or other party; • Non-adherence by the Company to its internal procedures; • Any other event to which the client or other party objects. <p>Complaints are independent of audit results and do not affect the audit scoring outcome.</p>

Customer feedback	Feedback from clients or other parties that does not indicate an objection or fault as defined above. This can include unsolicited positive letters, suggestions for MNCert improvement, etc.
Dispute	Occurs when a site is not in agreement with a finding during the audit process. The dispute is discussed during the audit process or closing meeting and resolved between client and auditor.
Challenge	A dispute from a site regarding audit outcomes that cannot be resolved at the auditor level. Challenges are elevated to the Program Manager or Technical Manager for resolution. Challenges are resolved prior to a Certification Decision.
Appeal	A formal disagreement pertaining to a Certification Decision or outcome. Appeals are resolved after a formal Certification Decision.
Supporting Office Manager	The person responsible for the operational supervision and performance of an audit activity.

4.0 Requirements

4.1 Responsibility

Position	Responsibility
Auditor	<ul style="list-style-type: none"> • Received initial dispute during the audit • Attempts to resolve dispute with site through reference to audit standard, guidance document
Program Manager	<ul style="list-style-type: none"> • Receives challenges from site when a dispute with the auditor cannot be resolved • Program Manager will review evidence provided
All personnel	<ul style="list-style-type: none"> • Receives complaints and records details on complaint form • Refers complaint to appropriate Manager / compliance team member
Technical Manager/Compliance Manager	<ul style="list-style-type: none"> • Verifies complaint • Advises the Director/Certification Manager/ Audit Program Manager for logging complaint in MNCert System Management Database • Ensures complete records are made on complaint form • Investigates complaint or delegates task to appropriate personnel • Decides on action and close-out with Director/Certification Manager/ Audit Program Manager • Conducts a root cause analysis
Director/Certification Manager/ Audit Program Manager	<ul style="list-style-type: none"> • Decides on action and close-out • Logs complaints into database • Provides complaints trend analysis reports from MNCERT System Database

VP of Technical Services	<ul style="list-style-type: none"> • Decides on action and close-out • Monitors complaint status and close-out • Reviews complaints trend analysis • Manages Formal Appeals to the Advisory Board or the Accreditation Body.
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4.2 Introduction

Complaints, disputes, challenges, and appeals are all forms of client feedback that need to be recorded and acted on. As such, this SOP details the various ways feedback is categorized and dealt with in MNCert.

All complaints are viewed by clients as a problem originating at MNCert. While the cause of the problem may not originate at MNCert, as the Certification Service Provider, we shall take ownership of the issue and shall be responsible for gathering and verifying all necessary information to validate the appeal and facilitate a satisfactory response. MNCert will be responsible for all decisions at all levels within the complaint procedure and will also ensure that no discriminatory action be taken against the complainant as a result of the submission, investigation, or decision of complaints.

Some client complaints may result from incorrect or incomplete information regarding MNCert certification services. Therefore, it is essential to provide education to clients about the practicalities of providing certification services. Each Critical Office Manager and the Certification Manager or Audit Program Manager has responsibility for this educative task.

Receipt shall be acknowledged within 5 days of receipt of the complaint or challenge. Initial response will be given within 10 days. A full written response shall be given to the customer at the conclusion of any investigation. Appeals and challenges shall be concluded within 20 days of receipt.

If the complaint related specifically to IFS, the entire timeline should be concluded within one week.

All complaints, disputes, challenges, and appeals shall be dealt with as confidential documents where possible.

5.0 Complaints

Complaints shall be acknowledged, accepted courteously and dealt with efficiently, simply and in a timely manner. Complaints shall be investigated whether they are perceived to be a problem caused by MNCERT or not. Clear, courteous and adequate communications with the complainant shall occur.

Where a complaint is received from a user or third party relating to an issue or situation pertaining to a MNCERT certified client, the Certification Manager or Audit Program Manager shall initially advise the originator that it is MNCERT policy to inform the client concerned. A decision will then be made to determine whether the circumstances relate to a certification issue and if not the originator shall be advised accordingly.

If the complaint does relate to a certification issue and is deemed to be valid, then the situation shall be advised to the client concerned along with a request for information.

If the appropriate Manager / Compliance Team member is not the person who received the complaint, this person shall refer the complaint to the appropriate Manager. The following information shall be recorded:

- Complaint referred to: Name of appropriate Manager or delegate
- Verification of Complaint Comments: any additional information obtained from the conversation with the complainant

The appropriate Manager shall log the complaint into the MNCERT System Management Database for management of tracking. This page is used to document details of the complaint investigation.

Once entered into the system the complaint will be monitored by the Compliance Team to ensure that appropriate action is taken to resolve it and close it out in an appropriate and timely manner.

The complaint shall be thoroughly investigated with remedial action selected to enable the complaint to be resolved. Remedial action shall be taken speedily.

If the complaint pertains to a certification decision the Certification Manager or Audit Program Manager shall exclude them self from involvement and escalate the issue to the MNCERT Vice President or Technical Manager.

Remedial actions may be:

- Amending the text of a client report; without changing the technical outcomes usually these changes are typographical errors only
- Changing an invoice
- A review of audit outcomes by an independent qualified auditor
- Re-audit
- Other action acceptable to both the Company.

The appropriate Manager shall decide on remedial action to be taken to resolve the complaint. The complainant is notified of the action to be taken and if satisfied, that action is implemented. If the complainant is not satisfied the matter is referred to the Managing Director.

6.0 Disputes

A dispute occurs when a finding during an audit is not agreed upon between the client and the auditor. A dispute can occur during the course of the audit or during the closing meeting. The auditor will attempt to resolve the dispute with the client by referencing the standard requirements or any accompanying guidance documents which may help in understanding the finding.

If the client still does not agree with the finding the dispute is elevated to the relevant qualified Program Manager who will review all evidence provided by both the client and the auditor. If the auditor is not aware that the client has elevated the dispute, the Program Manager will inform the auditor of the situation and the outcome of the review.

If the dispute cannot be resolved with the Program Manager review, the dispute becomes a challenge and must be documented in writing (see 7.0 Challenges).

7.0 Challenges

Challenges are when an audited site objects to a finding or the scoring of an audit. Challenges should use FORM 63 to document that challenge. Challenges can occur through email or over the phone however if the challenge is easily fixed such as a typo or other minor issue.

All challenges shall be logged in the Complaint/Challenge/Appeal Log, FORM 3. Once logged, challenges shall be sent to trained and approved technical reviewers who are able to review challenges and accept/deny. It is up to the reviewer to determine if there is enough information to make a decision on the challenge. If more information is required, the reviewer may reach out to the site and/or the auditor to find more info.

The auditor should be made aware of all challenges when they are received as well as the outcome of the challenge review. Any comments from the auditor related to the challenge shall be recorded in the Complaint/Challenge/Appeal Log.

The individual processing the technical aspects of the challenge and making a challenge determination shall also not be the individual making the certification decision. Those functions must be done by separate individuals.

If the challenge cannot be resolved to the satisfaction of the customer, the Director in consultation with the Technical Manager/Certification Manager and the appropriate Supporting office (where necessary) shall try to resolve the issue. The appellant should be invited to formally present their case to the Director. Where the Director cannot resolve the issue to the satisfaction of the appellant, the details of the challenge shall be presented to the Vice President of Technical Affairs. The appellant should be invited to formally present their case to the Vice President. Once the decision of the Vice President is made, the decision is final and the report and certificate are completed with the final decision in being reflected. Further appeals can occur after the report and certificate are created and the appeal process below is followed from that point on.

NOTE FAIR FARMS PROGRAM: If the site and MNCert cannot reach an agreement and resolve the issue, this will be referred to the Scheme Owner for a final decision. The Scheme Owners' decision is final and cannot be appealed.

8.0 Appeals

Appeals occur after a certification decision has been made. Every disagreement prior to the certification decision is either a complaint or a challenge.

A technical individual resolving an appeal shall not also make the certification decision.

Clients are provided with guidance on how to make an appeal in the MNCERT Terms and Conditions/Codes of Practice.

The letter or other notification of appeal is passed to the Technical Manager, Certification Manager or Audit Program Manager, who may forward the information to the Director. The Director in consultation with the Technical Manager and the appropriate Supporting office (where necessary) shall try to resolve the issue. The appellant should be invited to formally present their case to the Director. Where the Director cannot resolve the issue to the satisfaction of the appellant, the details shall be forwarded on to the Vice President of Technical Affairs. The appellant should be invited to formally present their case to the Vice President. Where the Vice President cannot resolve the issue to the satisfaction of the appellant, the details shall be forwarded to a nominated Appeals Committee of the Advisory Board. The Vice President submits to the committee any evidence supporting the decision subject to appeal. Individuals actively involved in the audit and certification decision process relating to the complaint shall not be included in the Appeals committee.

Once a decision has been reached, the MNCert informs the client of that decision in writing and the auditor must be informed. This notification shall indicate that the client has the option to notify the scheme owner or the Accrediting Body if they are unhappy with the outcome of the appeal. The Accrediting Body, may only review the effectiveness of the MNCERT appeals process. The Accrediting Body cannot alter the decision reached by the Committee.

All correspondences associated with the appeal are filed in the job file. The resolution is recorded in the MNCERT Complaints register.

Note: Appeals regarding decisions on the suspension and/or withdrawal of the SQF Certification by MNCERT **shall not** delay the decision to suspend or withdraw the Certification.

Where the situation is not resolved through the Appeals process and results in a formal dispute, the Director shall advise the Mérieux NutriSciences Group Legal Division and seek guidance on further action.

9.0 Monitoring

9.1 Monitoring Reports

As appropriate Supporting offices shall ensure that the complaint is resolved in a timely manner with outcomes reported to the Certification Manager/ Audit Program Manager MNCERT.

9.2 Complaint Analysis

Complaints/Challenges/Appeals shall be analysed for trends and conformance with Company quality indicators. The Certification Manager will ensure that analysis occurs and that the results of the analysis are presented at management meetings, management review meetings and other meetings as required.