Document Number: BNL-GEN-SOP003-EN

Document Title: GEP 1103 - Treatment of complaints

Document Notes:

Document Information

Revision: 25	**Vault:** BNL-GEN-DOC-rel
Doc Type: BNL-GEN-MASTER-EN	**Status:** Release

Date Information

Effective Date: 14 Apr 2023	**Release Date:** 14 Apr 2023
Next Review Date: 14 Apr 2026	**Expiration Date:**

Control Information

Author:	**Owner:**
Previous Number:	**Change Number:** BNL-GEN-DCR0353-EN

Signature Manifest

Document Number: BNL-GEN-SOP003-EN **Revision:** 25
Title: GEP 1103 - Treatment of complaints
Effective Date: 14 Apr 2023

All dates and times are in Europe/Brussels.

GEP 1103 - Treatment of complaints

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GEP 1103 - Treatment of complaints

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1. Objective

The purpose of this procedure is to lay down complaint handling so as to ensure that deficiencies are pointed out, registered and resolved in order to avoid reoccurrence and thus improve the effectiveness of the quality assurance system. The internal or external complainant should also be informed about the findings and the conclusion of the investigation.

On simple request, any interested party can receive an uncontrolled copy of the procedure on the treatment of complaints (GEP 1103). This procedure is also publicly accessible through the SGS Website (http://www.sgs.be/nl-NL/Our-Company/About-SGS/SGS-in-Brief/SGS-in-Belgium/Quality-in-Belgium.aspx for Belgium and https://www.sgs.nl/nl-nl/our-company/about-sgs/sgs-in-brief/sgs-in-netherlands/quality-in-the-netherlands for the Netherlands).

If another method has been laid down within a sector, either globally within the sector, or in consultation with a customer, or in contracts, agreements, covenants, standards, or through any other external source, and this method is in accordance with all applicable (legal) provisions, rules and regulations, this method shall take precedence over the provisions of this procedure, provided the local method is described in a sectorial or operational procedure.

2. Definitions

Complaint (internal or external):

a) Any written (letter, mail, fax, ...) comment expressing displeasure or dissatisfaction about the performance or execution of an order, as well as any verbal comment and/or question that has been confirmed in writing by the complainant on request of the recipient, and that cannot be categorized under b., must be regarded as a complaint and therefore be recorded and handled as a complaint.
b) A comment and/or question that is promptly verbally or with a form of direct communication (mail or other communications platforms) resolved, and does not trigger any special investigations, interventions or structural changes shall not be regarded as a complaint and hence not be recorded.

In practice, there are 6 types of complaints:

1. Formal complaints (see a.), both external and internal (OFI in the IF-database);
2. Complaints in connection with a claim (notification of liability) (OFI);
3. Complaints in connection with an appeal (BNL) or objection (NL) (OFI);
4. Complaints about certificate holders (only applicable in departments under ISO 17021 and/or ISO 17065) (CACC in the IF-database);
5. Revised reports, reports in which content was changed from the originally issued report (database “Revised reports” on the QHSE teamsite);
6. Credit notes, notifications of a financial or accounting nature, which fully or partially cancel the amount of a previously issued invoice (CN records on the QHSE teamsite).

3. Procedure

3.1 Complaint handling

All complaints must be carefully handled to:

- satisfy the complainant as much as possible;
- prevent SGS' reputation from being harmed;
- draw lessons from them;
- Confidentiality is guaranteed at all time.

The following additional expenses related to complaints handling should be determined, if possible and considered useful:

- the consequences of the complaint;
- investigation of the causes;
- required action.

This is needed to support complaint prevention efforts with economic figures.

The SGS (BNL) Group is responsible for all decisions at every level of the process of treating complaints. The submission of complaints, the investigation and the decision about it should not lead to discriminatory measures against the complainant.

The flowchart in 3.3 provides a general overview of the complaints handling process. “Customer is also to be read as “complainer”.

In principle the receiver of a complaint is responsible for recording it. This implies him or her to record it or to pass it on for recording.

However, depending on the situation and the business, it may be deemed appropriate for Lab and/or Operations to record/handle complaints autonomously.

Complaints should preferably be handled through the Customer Services of a Business Unit. For this purpose, one or more individuals shall be designated responsible for the initial response to a complaint. They shall also be in charge of recording it and notifying the relevant services and/or people. The IF-system allows for an automatic confirmation mail to the customer, but the use of this functionality is not mandatory. Whatever the approach used, the department involved remains responsible for the demonstration of such a confirmation.

A complaint shall always be treated by another person than the one(s) directly involved in the complaint. The Operations Manager(s) of the department(s) concerned shall ultimately be responsible for the proper handling of complaints. For that purpose, every department involved does its own (part of) the investigation. The different investigations are then consolidated into a final answer. In principle, contact with the customer about an external complaint shall be the task of Customer Services, but this may be arranged autonomously per business line or per site, under the responsibility of the Business Unit Manager. The implementation of corrective actions shall be the responsibility of the designated employee.

A root cause analysis shall always be performed for each complaint handled (also refer to procedure GEP 1104 - Improvements) and the scope of the issue shall be examined in order to take the corrective actions that are needed to prevent the issue from reoccurring. Otherwise it suffices to make a correction.

The respective quality manager(s) should always be informed, insofar as the department is involved. As far as the registration was not done by QA or HSE, the quality manager(s)/safety officer(s) will be informed automatically when using the IF-system.

The quality manager will then see to it that investigations are started up in a timely manner and the customer receives an answer.
QA or HSE will also investigate whether a complaint is recurrent. In this matter GEP 1112 applies.

The legal department shall take over all handling proceedings of complaints that are linked to, or result in, a claim, considering the specific nature of such claims. All communications about the situation shall also be added to the complaint file. A claim is always recorded in duplicate. A first record as a complaint, a second as a claim, using the copy function of the IF-system. The claim-IF allows for the legal treament of the claim, without any interference of the internal investigation. The complaint-IF allows for the simultaneous internal investigation and documentation of the complaint, independent of the claim. The delais given in GEP 1104 do not apply to the claim-IF, but certainly for the complaint-IF. The claim-IF can only be closed out after approval of the legal department.
This implies that the corresponding reports and samples of a claim quarantined separately. The samples can only be destroyed after instructions in writing from the customer(s) or agreement from the legal department to close out the IF involved.

A complaint shall be closed by the quality manager of the department. In principle, a complaint can only be closed out when the customer agrees with the response and the root cause and corrective actions included in it. If the customer does not respond within 2 weeks, this is considered as an acceptance of the response and the complaint can be closed out provided that the corrective measures have been implemented or are imbedded in the system (e.g.reffering or being part of another IF).

In order to shorten the processing time of the actual complaint handling, (time-consuming) actions may be disconnected from the close out of the complaint itself. To this end, a copy of the complaint is taken and converted into an IMP (improvement action), for further monitoring of the realization of the actions.

Where applicable, internal audits shall pay special attention to the process of closing actions for improvements, and complaints in particular. In the process of handling or closing the complaint, a cause code shall be assigned on the basis of all available data and their analysis. The cause codes and subsequent processing of complaints are described in procedure GP 1104 - Improvements.

In case of a complaint regarding a certificate holder regarding the certification activities under ISO 17021 and/or ISO 17065, for which a certification department is responsible, this department shall send the complaint within a reasonable time frame to the certificate holder. When investigating the complaint about the certificate holder, the effectiveness of the certified management system shall be taken into account. When applicable, the certifcation department, together with the certificate holder and the complainer, shall determine if and to what extent the complaint and the solution shall be made public.

A complaint in connection with an appeal or objection (in short appeal) is treated as described in GEP 1116. Every appeal is recorded in an IF, as OFI, and marked as “appeal”.

There is a simplified procedure for recording Revised reports and Credit notes, where only the cause code is provided (see procedure GEP 1104 - Improvements). One acceptable option is to regard them as a complaint, and to handle them as such. If recording and analysing Revised reports and Credit notes yields no further added value, the Business Unit Manager, in consultation with the quality manager, may decide to stop recording and analysing them. This decision shall be recorded in the Business Management Review and approved in the Central Management Review.

3.2 Deadlines and responses to customers

1. Registration: A complaint shall be recorded asap, preferably within 1 working day of its receipt. It is accepted that due to circumstances the registration will be registered up to a maximum of 5 working days later. If the registration falls outside this period, a justification will be given in the IF system.

2. Initial response: After the complaint has been recorded, an IF number is assigned. A first reaction shall be communicated to the customer preferably within 1 working day after the complaint has been recorded, in principle by the recipient of the complaint, and if possible, mentioning the IF number, using the following standard initial response:

Dutch version:

«Wij bevestigen het bericht over uw klacht met betrekking tot (*omschrijving klacht*) van …/…/……. in goede orde ontvangen te hebben. In het kader van ons kwaliteitsbeleid en met het oog op een continue optimalisatie van onze dienstverlening werd uw klacht geregistreerd onder IF (*nummer van de IF*). Deze registratie houdt evenwel op geen enkele wijze enige erkenning van aansprakelijkheid, welke dan ook, in.

We zullen u op de hoogte houden van de bevindingen uit ons onderzoek.

We verzekeren u er alles aan te doen om aan deze klacht zo snel mogelijk gevolg te geven.»

English version:

«We confirm receipt in good order of your complaint regarding (*description of the complaint*) from …/…./…… Given our quality policy and in view of a continuous improvement if our services, your complaint has been recorded as IF (*nr. of the IF*). This registration implies no recognition of any liability of any kind.

We will keep you informed of the outcome of our investigations.

Please be assured we do everything in our power to respond to this complaint.»

French version:

«Suite à votre message du …/…/……, nous accusons réception de votre réclamation portant sur (*description de la plainte*). Dans le cadre de notre politique qualité et en vue d'une amélioration continue de notre service, votre réclamation a été enregistrée sous la référence IF (*n° de l'IF*). Cette régistration ne signifie aucune reconnaissance de responsabilité quelconque.

Nous vous informerons du résultat de notre enquête.

Soyez assuré que nous sommes résolus à répondre à cette plainte le plus vite possible.»

Other, similar standard replies are allowed.

3. Complaint handling follow-up: For Life Sciences, the customer shall in principle receive a final response within 30 days. This deadline is monitored by QA. If this is not possible, the

customer shall be informed and shall receive an interim update, in principle from the recipient of the complaint.

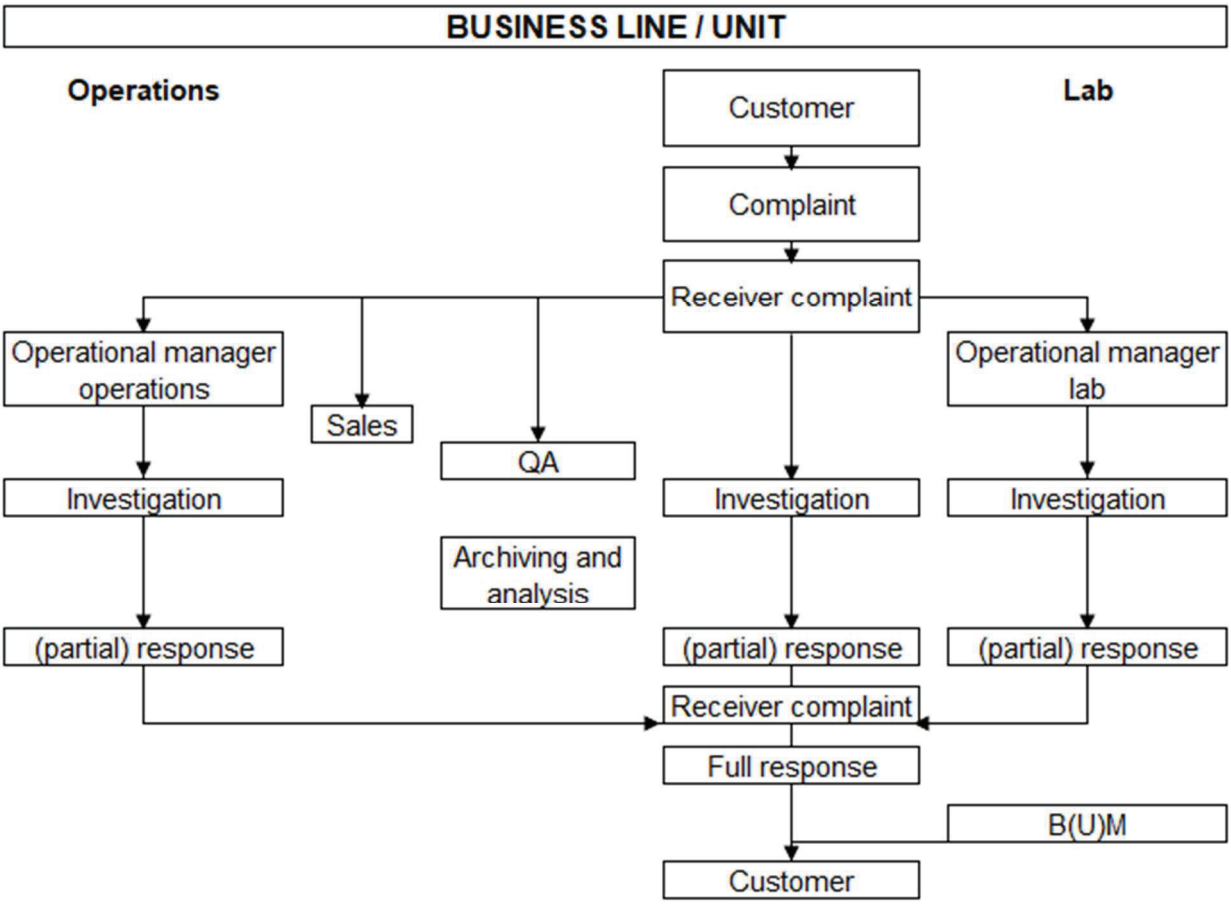
Within the 17025 and/or ISO 14065 accredited departments, a similar approach applies, with the exception of the 30-day term. When the handling of a complaint will take a longer time (e.g. more than one month), the complaining party will receive progress reports every month as long as the treatment is ongoing, insofar as this can be realized.

4. Closing the complaint: In the case of 17025 and/or ISO 14065 accredited departments / activities, the complainant will, insofar as possible, be informed about the outcome of the complaints investigation. The response that will be sent to the customer is either drawn up or reviewed and approved by one or more persons who were not involved in the original lab activities.

   The complainant will, as far as possible, be formally informed about the end of the complaint handling.

5. Claims: For claims, the standard responses as stated in the claims procedure shall be used, not those stated above. The registrator will also see to it that only the “claim reaction” is sent to the customer, with reference to the claim-IF. The deadlines and updates do not apply to claims.

3.3 Complaints handling flowchart



3.4 Reporting

3.4.1 General

Complaints should be reported and handled as soon as possible. All relevant information should be included in the report.

3.4.2 Reporting

The Improvement Form (IF) as described in procedure GEP 1104 - Improvements shall be used for reporting and recording complaints.

4. Recording and archiving

Complaint reports shall be (electronically) archived in a database for at least seven years.

5. Annexes

Database Improvement Forms

Analysis IF's

GP 1103/B 1 - Credit note record - Example;
GP 1103/B 2 - Revised report record - Example.