

## Contents

|   |   |
|---|---|
| Purpose .....   | 2 |
| References .....  | 2 |
| Definitions .....   | 2 |
| Complaints Procedure.....   | 3 |
| Appeals Procedure.....  | 4 |
| Additional Requirements for Complaints and Appeals involving the ema Accreditations ..... | 5 |
| FSC Complaints, Disputes and Appeals .....  | 5 |
| SFI Public inquiries and official complaints .....  | 6 |
| Complaints and Appeals for Global Food Programs.....                                      | 7 |
| RSPO P&C Program Complaints and Appeals.....  | 8 |
| Disability and Human Services complaints management and notification.....                 | 9 |

## Purpose

This document defines how complaints, appeals and positive feedback shall be received and managed by SAI Global (see definitions).

## References

SAI Global Assurance Quality Manual (Doc 2075)  
Promapp Process – Manage Complaints; Manage Appeals; Manage Positive and Other Feedback

## Definitions

|                        |  |
|------------------------|--|
| Complaint              | <p>A formal expression of dissatisfaction about SAI Global personnel, services, decisions and/or clients.</p> <p>Note:</p> <ol style="list-style-type: none"><li>1. A minor issue dealt with and resolved through the daily working processes is not required to be actioned through this procedure.</li><li>2. SAI Global Legal Counsel must be consulted in the cases that the legal representative of a 2<sup>nd</sup> or 3<sup>rd</sup> Party raises a complaint, appeal or other issue.</li></ol> |
| Feedback               | <p>Information received by SAI Global in reaction to a product, a person's performance or a process which is used as a basis for improvement.</p> <p>Note:</p> <ol style="list-style-type: none"><li>1. Feedback is received from a number of sources for example customer surveys, voice of the customer.</li><li>2. Feedback does not necessarily result in a complaint and therefore may be handled differently for example via a systems improvement.</li></ol>                                    |
| Appeal                 | <p>Formal request by Applicant or Licensee for review of the outcome of a complaint investigation for reconsideration of a decision related to SAI services.</p> <p>Note: If the appeal has not gone through the complaint process first instigate the complaints process.</p>   |
| Certification Approver | <p>A Person authorised by SAI Global Certification Services Pty Ltd to make a certification decision.</p>  |
| Decision               | <p>The result of a review/investigation of the complaint or appeal.</p>  |

## Responsibilities

The Global Head of Technical Services shall:

- Ensure that a member of staff is appointed to manage the implementation and maintenance of this procedure.

Area Head of Quality or local Quality Manager Managers shall:

- Provide reporting of complaints to local, regional or Global Impartiality Committees and Operations as required.
- Escalate an appeal to the Global Head of Technical Services to review and assign an independent review of the original decision.
- Identify and report complaints open in excess of 90 days to the relevant Senior Management.

Each relevant functional area or location shall:

- Ensure that appropriate staff are assigned to coordinate management of complaints until closeout,
- Maintain the Feedback Register that is applicable to their functional area and/ or location.

The Feedback Register is accessible from Global Business Portal (GBP).

<http://ourgateway.assurance.saiglobal.com/Client%20Records/Pages/FeedbackRegister.aspx>

## Complaints Procedure

The process for complaints and appeals shall be available to the public via the SAI Global website.

Submission, investigation and the decision on appeals shall not result in any discrimination against the Appellant by SAI Global.

### Process

Complaints can be received and recorded in the Feedback register by any member of staff.

Each complaint will be assigned a responsible person; this will normally be the person responsible for the client. They will notify the client of receipt and acknowledgement of the complaint.

The responsible person will investigate and manage the complaint through to completion. This may need assistance from other staff i.e. Technical Services Team.

Once a decision on the complaint is received the responsible person will advise the client of this decision.

If the Client wishes they can appeal the complaint decision. The procedure for appeals is outlined below.

Any additional or scheme specific requirements are outlined in sub-sections of this procedure.

Further details can be found in the [Promapp process – Manage Complaints](#).

# Appeals Procedure

The process for complaints and appeals shall be available to the public via the SAI Global website.

Submission, investigation and the decision on complaints and appeals shall not result in any discrimination against the Appellant by SAI Global.

## Process

Following the outcome of the complaint if the client wishes to raise an appeal the responsible person will request this in writing from the client.

Once written confirmation of an appeal request is received this will be sent to the Global Head of Technical Services to review and assign an independent investigation of the original complaint.

Note: All information on the appeal will be added to the original complaint in GBP. The title of the original complaint will be amended to add the word “appeal” at the start; this will ensure SAI can determine appeals from complaints.

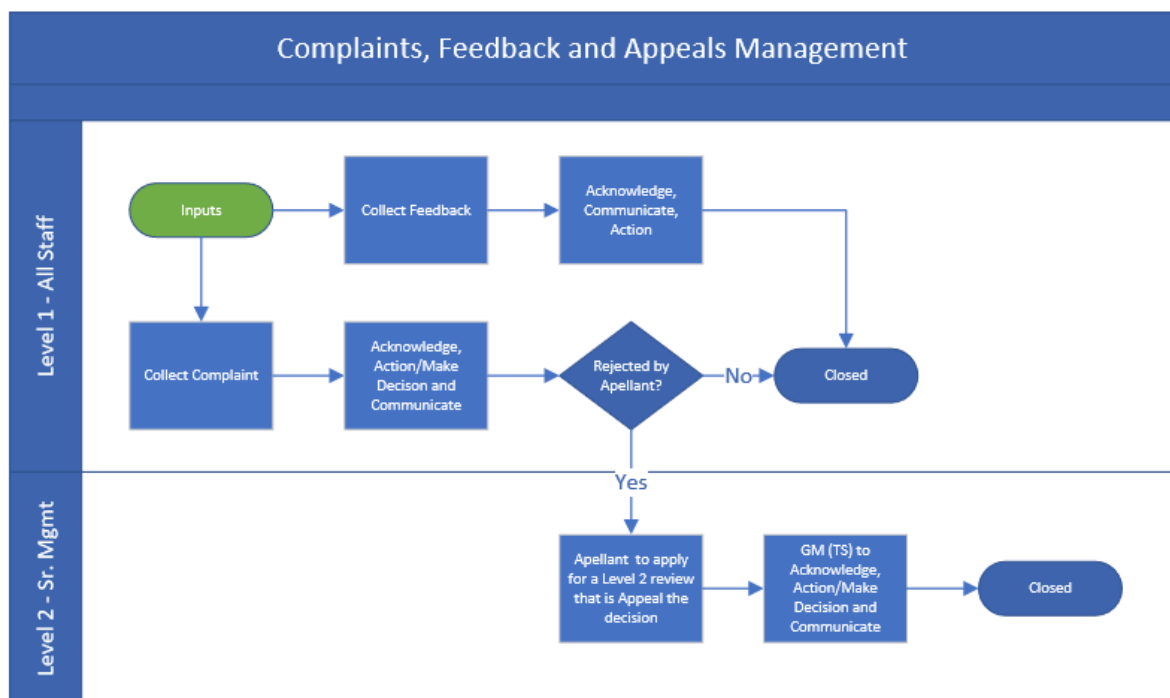
Each appeal will be assigned a responsible person. They will notify the client of receipt of the appeal.

Once a decision on the appeal is received the responsible person will advise the Global Head of Technical Services of their decision.

The Global Head of Technical Services or appropriate Senior Manager will advise the client of the outcome of the appeal.

Any additional or scheme specific requirements are outlined in sub-sections of this procedure.

Further details can be found in the [Promapp process – Manage Appeals](#).



## Additional Requirements for Complaints and Appeals involving the ema Accreditations

The Vice President Latin America, Sales and Operations, informs the Appellant of the plan for resolving the appeal within 10 working days of receiving the appeal. A copy of the plan is also sent to ema.

If the appellant does not agree with the decision issued, they may report this in writing to ema, attaching documents supporting the complaint. ema will send a copy to enable SAI Global to justify its decision taken. This must occur within 5 working days.

On completion of a review of the SAI Global report, ema may request SAI Global to reconsider its decision.

If a report is not issued by SAI Global, it will be considered that we have accepted the appeal from the customer and ema and SAI Global will proceed accordingly.

## FSC Complaints, Disputes and Appeals

(Based on FSC-STD-20-001 V4-0)

The generic procedures apply in all cases except for the specific requirements of FSC as described in this Section.

Definitions based on the FSC standard

**Appeal:** request by the client to the certification body for reconsideration of a decision it has made relating to that client.

**Complaint:** expression of dissatisfaction by any person or organization presented to a certification body relating to the FSC activities of that certification body and/ or the FSC activities of their clients (adapted from ISO/IEC 17000:2004 (E)). In the context of FSC, a complaint includes the name and contact information of the complainant, a clear description of the issue and evidence to support each element or aspect of the complaint.

### 1.0 RESPONSIBILITY:

- 1.1 The Technical Manager- Forestry program is responsible for coordinating all activities relating to complaints, disputes and appeals. Also, the maintaining of any associated records. If the Technical Manager- Forestry program was involved in the certification audit, then in this case the Area Head of Quality will designate a replacement.
- 1.2 The Area Head of Quality is responsible for the final resolution of complaints, disputes or appeals.
- 1.3 SAI Global is responsible for all decisions at all levels of the appeals and complaints handling processes. SAI Global ensures that the persons engaged in the appeals, complaints and disputes handling processes are different from those who carried out the audits, made the certification decisions. A complainant shall be offered the opportunity to refer their complaint to ASI, if the issue has not been resolved through the full implementation of SAI Global's own procedures, or if the complainant disagrees with the conclusions reached by SAI Global and/ or is dissatisfied by the way SAI Global handled the complaint. As the ultimate step, the complaint may be referred to FSC.

### 2.0 INVESTIGATION AND RESOLUTION OF COMPLAINTS or APPEAL:

- 2.1 Upon receipt of the complaint, dispute or appeal the Technical Manager of the Forestry program will arrange for this to be entered in the Feedback Register and provide an initial response, including an outline of the proposed course of action to follow up on the complaint, within two (2) weeks of receiving a complaint, dispute or appeal.

- 2.2 The Technical Manager-Forestry program or designee shall keep the complainant(s) informed of progress in evaluating the complaint, and shall have investigated the allegations and specified all its proposed actions in response to the complaint within three (3) months of receiving the complaint
- 2.3 Full implementation of actions and confirmation of implementation (e.g. correction and closing out of non-compliances that may have been identified as a result of the complaint) shall be completed in compliance with the respective FSC standards.
- 2.4 The complainant will be notified when the complaint is considered to be closed, meaning that SAI Global has gathered and verified all necessary information, investigated the allegations, taken a decision on the complaint and responded to the complainant.
- 2.5 In the case of a certified company if the review or any other additional information indicates that the certified organization no longer complies with SAI Global requirements as defined in the Terms and Conditions (Form No. M025), the organization shall be re-audited, or their certification terminated as per Guidance to suspension and reregistration process.

### 3.0 RECORDS:

Records of all the above actions are attached in the Feedback Register.

## SFI Public inquiries and official complaints

### (Based on SFI 2015-2019 Program Section 11)

The generic procedures apply in all cases except for the specific requirements of SFI as described in this Appendix

### 1.0 RESPONSIBILITY:

- 1.1 The Technical Manager- Forestry program is responsible for coordinating all activities relating to complaints, disputes and appeals. Also, the maintaining of any associated records. If the Technical Manager- Forestry program was involved in the certification audit, then in this case the Vice President, Corporate Operations, Accreditation and Quality will designate a replacement.

### 2.0 Official Complaints Questioning the Validity of a Certification to SFI 2015-2019 Forest Management Standard or SFI 2015-2019 Fiber Sourcing Standard

A complaint does not challenge the credibility or the content of the SFI 2015-2019 Forest Management Standard or SFI 2015-2019 Fiber Sourcing Standard, but rather it challenges the audit findings and the decision to grant the certification, or events that have happened since the last audit that questions the maintenance of the certification.

#### 2.1 Complaint Process

The complainant outlines their concerns in a letter to SAI Global. SAI Global may request additional specifics associated with the concerns and will investigate the issue in accordance with its procedures that were approved by their accreditation body. If SAI Global finds a sound basis for the complaint, then it would require the *Program Participant* to take corrective action to address the complaint and advise the complainant accordingly. If SAI Global did not find a sound basis for the complaint and felt the certification was appropriately granted and performance has not changed since the certification, SAI Global will inform the complainant of this. If the findings of SAI Global do not satisfy the complainant then they can move to the higher authority which is the body that accredited SAI Global, which is ANAB ([www.anab.org](http://www.anab.org)). The accreditation body would then conduct its own investigation into the complaint as the highest authority. In the event litigation is involved between the external party and *Program Participant*, the complaint process shall be suspended pending resolution of the litigation. It shall be re-started following resolution of the litigation if SFI nonconformity issues remain.

### 3.0 Public Inquiries Regarding Inconsistent Practices and the ILO Core Conventions (87, 98 and 111)

Any party with information or claims about a *Program Participant's* individual practices that may be in nonconformity may seek to have those claims investigated. The complainant shall present specific claims of nonconformity in writing and in sufficient detail to the *Program Participant*. Within 45 days of receipt of the complaint, the *Program Participant* shall respond to the complainant and forward a copy of the complaint and its response to SAI Global for future review via surveillance or certification audits.

### 4.0 Challenges or Complaints regarding SFI On-Product Label Use (Section 5)

- 4.1 The *Office of Label Use and Licensing* will hear challenges or complaints regarding SFI on-product label use.
- 4.2 Any party with information or claims about the practices of an *SFI Program Participant* or *label user*, or questions about the validity of an SFI Section 3 or 4 (in the SFI requirements documents) certification and or SFI label use may seek to have those claims investigated, as outlined below.
1. The complainant should outline concerns in a letter to the certificate holder or *label user*.
  2. Within 45 days, the certificate holder or *label user* shall respond to the complainant, and forward a copy of the complaint and response to SAI Global
  3. SAI Global shall investigate the validity of the complaint based on the seriousness of the claim and respond no later than the next annual assessment.
  4. If the complainant is not satisfied, they may provide the original documentation and response to the SFI *Office of Label Use and Licensing*, which shall investigate and respond within 45 days.

### 5.0 RECORDS:

Records of all of the above actions are attached in the Feedback Register.

## Complaints and Appeals for Global Food Programs

### Appeals

| Standard             | Notification of Appeal from Client  | Finalise Appeal                             |
|----------------------|---|---|
| BRC Global Standards | 7 calendar days from receipt of the certification decision  | 30 calendar days from receipt of the Appeal |
| IFS Standards        | 7 calendar days from receipt of the certification decision (SAI requirement, no specific IFS requirement) | 20 working days from receipt of the Appeal  |

### Client Complaints

| Standard Owner       | Acknowledge Complaint                        | Initial Response                          | Final Response                        |
|----------------------|--|---|---------------------------------------|
| BRC Global Standards | No specific requirements                     |   |                                       |
| IFS Standards        | 5 working days from receipt of the complaint | 10 working days from receipt of complaint | After full investigation of complaint |

## Complaints about SAI Global (BRC referrals / IFS Integrity Program or complaints management)

| Standard Owner       | Timescales / Actions  |
|----------------------|---|
| BRC Global Standards | A report to be submitted to BRC within 28 calendar days of notification of complaint / referral   |
| IFS Standards        | <p>If the nature of the complaint is in relation to the <b>quality of the IFS audit or audit report</b>, the certification body must provide a response detailing the cause and measures put in place to rectify the issue within 2 weeks of notification of complaint</p> <p>If the complaint relates to an <b>administrative error</b> e.g. IFS audit report, certificate or database, the certification body must provide a response detailing the cause and measures put in place to rectify the issue within 1 week of notification of complaint</p> |

## RSPO P&C Program Complaints and Appeals

The generic procedures apply in all cases except for the specific requirements of RSPO P&C Programs as described in this section.

*Note: Whilst RSPO standards make reference to the term grievance, there is no definition of grievance stated within or in other related documents issued by RSPO. Therefore, SAI Global has applied the definition of grievance to mean complaint, feedback, and appeal.*

- 1.1 The Customer Relation Manager in coordination with RSPO P&C Program Managers are responsible for coordinating all activities relating to client complaints and appeals raised against RSPO certification program including certified organization and certification decision.
- 1.2 1.2 RSPO P&C Program Managers are also responsible for ensuring those complaints and appeals are followed up in accordance with RSPO Certification Systems for Principles & Criteria, also RSPO Complaints and Appeal Procedure, these include:
  - o Immediately inform ASI, if SAI Global fail to resolve a complaint; as well as informing the complainant about ASI Complaint Procedure which is available on ASI's website.
  - o Inform the RSPO Secretariat if the complaint refers to the conditions of RSPO membership.
  - o The above communication shall be conducted within 30 days.
- 1.3 SAI Global representative (i.e.: RSPO P&C Certification Program Manager) **shall** notify ASI and RSPO Secretariat **within 7 (seven) days** if the received complaint coming from any RSPO stakeholders concerning SAI Global competency, or the certification decision made or the outcome of a certification assessment. Customer Relations Manager in collaboration with RSPO P&C Certification Program Manager will seek resolution of complaints within 60 days. If SAI Global fails to resolve a complaint within that timeframe, SAI Global shall inform ASI immediately. Furthermore, SAI Global will inform the complainant about ASI Complaints Procedure which is available on the ASI's website.
- 1.4 If SAI Global receive a complaint that refers to the conditions of RSPO membership then SAI Global representative (i.e.: RSPO P&C Certification Program Manager) shall inform the RSPO Secretariat if a resolution was not achieved within 60 days. Customer Relations Manager in collaboration with RSPO P&C Certification Program Manager will monitor the resolution process.
- 1.5 Complaints about existing RSPO P&C Clients:
  - 1.5.1 Complaints about clients or Certificate Holders can come from public articles (this including online media), written letter from Complainant to SAI Global Indonesia, notification from RSPO Secretariat and or other credible sources.



- 1.5.2 All complaint/s received will be validated by RSPO P&C Certification Program Manager whether they are related to RSPO P&C Certification or not. If the complaint/s related to RSPO P&C Certification, the RSPO P&C Certification Program Manager in collaboration with Customer Relations Manager shall register the complaint into SAI Global Business Portal (GBP).
- 1.5.3 RSPO P&C Certification Program Manager proactively monitor the complaint in RSPO Complaint Portal by accessing the RSPO Complaint Panel Minutes Of Meeting and Complaint Tracker on a monthly basis. Information received from RSPO Complaint Portal will be inform to auditor through email.
- 1.5.4 If a complaint/s received before Annual Surveillance Audit, RSPO P&C Certification Program Manager will inform the auditors team regarding the complaint/s. The Auditors team then shall verify the issues during audit and shall be mentioned into the audit report.
- 1.5.5 If a complaints received after Annual Surveillance Audit, RSPO P&C Certification Program Manager will ask to the auditors team, whether the issues were covered during audit or not. If the issues are not covered during audit, the RSPO P&C Certification Program Manager will investigate it and decide whether a further investigation (i.e. Special Audit) is needed
- 1.5.6 In the event that a Special Audit must be carried out, the RSPO P&C Certification Program Manager in collaboration with the Service Delivery Manager and the planner, will assign an auditor team for a special audit within 14 working days after making the decision. The client or Certificate Holder will be informed regarding the special audit.

## Disability and Human Services complaints management and notification

Appeals, complaints and disputes (including any whistleblowing in regards to SAI Global clients) shall be handled in accordance with standard SAI Global Complaint Procedures. The process is explained at opening and closing meetings and clients or consumer can call SAI Global if they require assistance to make a complaint. Where the complaint or appeal relates directly the certification decision - making process the person allocated the responsibility for resolving the complaint shall involve input from a Technical Advisor. The Technical Advisor chosen shall be independent of the client audited, the audit team involved in the audit and the certification decision-making process.

Any matters relating to service providers referred by the relevant government Department will be actioned in line with the complaint's management process.

| Scheme      | Requirements  |
|-------------|---|
| HSV Scheme  | When complaints arise report annually to the department on complaints relating to its certification activities in the human services sector and their resolution.   |
| HSQF Scheme | The Department must be notified within 48 hours if a complaint is raised or an appeal lodged by a human service organisation as a result of an audit or a certification decision.   |
| NDIS Scheme | The SAI Global complaints system will be utilised to document: <ul style="list-style-type: none"> <li>any whistleblowing in regards to alleged abuse or harm related to certified NDIS providers or NDIS applicants</li> <li>allegations made against SAI global NDIS providers with the NDIS Commission also notified as part of this process. Notification to the NDIS Commission is by emailing to <a href="mailto:Registration@ndiscommission.gov.au">Registration@ndiscommission.gov.au</a></li> </ul> |

Where significant complaints are made by the Commissioner, the NDIS Commission or any other interested parties in relation to SAI Global performance, or the performance of an SAI Global certified provider, JASANZ will also be notified.