

	Prime Certification & Inspection Asia Pacific Inc.			
	Prime C&I Asia Pacific Inc. Makati City, Philippines Ph.: +632 8404 1002 Email: info@primeasiapacific.com Web: www.primegroup.ae			
Title	Procedure for Complaint and Appeals			
Doc ref: QP-07A	Issue: 01	Revision: 02	Date: 08/07/2024	Page 1 of 9
Prepared by	Quality Assurance In-Charge/ Quality Assurance Officer		Approved by	Certification Manager

1.0 Purpose

The purpose of this procedure is to describe handling of incident, complaint and appeals received from the client, in house and from other parties.

2.0 Scope

This procedure covers all complaint and appeal received at Organization by any means, like written, verbal, e-mail etc. It also includes adverse findings during audits/inspections.

3.0 Competency Criteria for Members of Appeal & Complaint Committee

- Working knowledge of Management Systems (FSMS, QMS, EMS, Halal etc.)
- Working knowledge of ISO/IEC 17021-1:2015, ISO/IEC 17065:2012, ISO 9001, ISO/TS 22003:2022, UAE.S GSO 2055-2:2021, ISO/IEC 17020:2012 & Philippine National Halal Certification Scheme of 2018
- Working knowledge of Prime Certification & Inspection’s certification & inspection processes
- Working or retired from a position at senior management level in areas of food, commerce, industry or government agencies for a minimum of three years.

4.0 Responsibility

4.1 **Quality Assurance In-Charge/ Quality Assurance Officer and Technical In-Charge** is responsible for receiving the complaint and appeal from the clients / other parties. Responsible to conduct consultation with the office staff and auditor/inspector are responsible for handling, validating and analysis of the complaint and appeal to the satisfaction of the clients / other parties

4.2 The overall responsibility to execute this procedure is given below.

Activity	Responsibility
Completion and submittal of incident report records for entry into the Corrective Action System	Quality Assurance Officer (internal incidents) / All staff (external incidents)

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Title	Procedure for Complaint and Appeals			
Doc ref: QP-07A	Issue: 01	Revision: 02	Date: 08/07/2024	Page 2 of 9
Prepared by	Quality Assurance In-Charge/ Quality Assurance Officer		Approved by	Certification Manager

Incident investigation and analysis	Quality Assurance In-Charge / Quality Assurance Officer/Technical In-Charge
Handling of Appeal and Submission to Complaints and Appeals Committee (for appeals)	Technical In-Charge
Appeal review, analysis and decision	Complaints and Appeals Committee

5.0 Description of activity

5.1 Quality System Incidents

5.1.1 For the purposes of this document “Quality System Incidents” are defined as complaints, suggestions, observations and opportunities for improvement. Quality System Incident data is entered into the Corrective Action System for proper treatment (QP04). This procedure describes the methodology by which Prime Certification & Inspection collects and processes incident reports; and communicates the impact to staff members.

5.1.2 Prime Certification & Inspection recognizes that incidents occur in daily operation that collectively have an impact on the Quality Management System. In order to properly analyze and address system issues a consistent and thorough process for collection of information is vital.

5.2 Complaints

Complaints are incidents of grievance or dissatisfaction with Prime Certification & Inspection’s service. Complaints may be:

- Internal in nature - raised by a Prime Certification & Inspection staff member with regard to internal service, operations or employee performance
- external in nature- raised by Prime Certification & Inspection clients, suppliers or other affiliated organizations
- written
- verbal

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Title	Procedure for Complaint and Appeals			
Doc ref: QP-07A	Issue: 01	Revision: 02	Date: 08/07/2024	Page 3 of 9
Prepared by	Quality Assurance In-Charge/ Quality Assurance Officer	Approved by	Certification Manager	

- complaints raised by client's customers or stake holders

5.3 Terminology used in this procedure for incidents

The incidents and complaints are considered as any of the below four things and procedure describes the system for handling the same.

5.3.1 Suggestions

Prime Certification & Inspection 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.

5.3.2 Appeals

Prime Certification & Inspection recognizes that the client may have some reservations or may not agree with the conduct of audit/inspection, audit/inspection findings, certification committee decision and / or overall interaction with Prime Certification & Inspection staff. Client is free to communicate the same to Prime Certification & Inspection Appeal subcommittee and this is treated as an appeal from the client.

5.3.3 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.

5.3.4 Opportunities for Improvement

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

5.4 Receipt of Incidents

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Title	Procedure for Complaint and Appeals			
Doc ref: QP-07A	Issue: 01	Revision: 02	Date: 08/07/2024	Page 4 of 9
Prepared by	Quality Assurance In-Charge/ Quality Assurance Officer	Approved by	Certification Manager	

5.4.1 The quality 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 recording all the information and details of the complaint. The filled report shall be submitted to Technical In-Charge for further action. In case of internal source, the incident report shall be submitted to Quality Assurance In-Charge/ Quality Assurance Officer. All reports shall be gathered and documented by the Document Controller

5.4.2 Technical In-Charge /Quality Assurance In-Charge/ Quality Assurance Officer shall contact (telephone, email, letter) the external source to acknowledge the receipt of information within 5 working days of receipt. He shall understand the issue in details 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.

5.4.3 In case of suggestion / opportunity for improvement, it is for Prime Certification & Inspection to study the suggestion and decide.

5.4.4 All such incidents received by any means or by any one 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 parties,
- Description of complaint and appeal,
- Reference of services against, which complaint and appeal is raised along with the reference ,date and other details,

5.4.5 Client / other parties' complaint and appeal incident report are issued to the Technical Manager/Quality Assurance In-Charge/ Quality Assurance Officer for analyzing the root cause.

5.4.6 Technical Manager/Quality Assurance In-Charge/ Quality Assurance Officer validates the complaint after checking necessary back-up records or personal interview of auditor/inspector / staff members (who were involved in to job).

5.5 Handling of Client Complaint and Observations

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Title	Procedure for Complaint and Appeals			
Doc ref: QP-07A	Issue: 01	Revision: 02	Date: 08/07/2024	Page 5 of 9
Prepared by	Quality Assurance In-Charge/ Quality Assurance Officer	Approved by	Certification Manager	

5.5.1 In case of a complaint / observation against Prime Certification & Inspection, Quality Assurance In-Charge/ Quality Assurance Officer analyses the issue to determine if there is system error or person error. He shall determine the root cause and determine correction, corrective and preventive action.

The possible complaints are –

- Administration - problems with appointments, certification/inspection files, certificates issued or issued late,
- Auditor/inspector/subcontractor problems with incomplete audit/inspection or surveillance documentation
- Agents - problems with general compliance with Prime Certification & Inspection administration or audit/inspection procedures

5.5.2 The correction shall be implemented immediately to satisfy the complainant. This may include training / counselling 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 email 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 personnel file for reference at the performance appraisals.

5.5.3 In case of a complaint / observation against a certified client, the Technical Manager/Quality Assurance In-Charge/ Quality Assurance Officer studies the complaint and discusses with the auditor/inspector (last audit/inspection). If the complaint is found genuine and valid i.e. 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, Technical Manager/Quality Assurance In-Charge/ Quality Assurance Officer follows up with the client for the response. Depending on the response, Technical Manager/Quality Assurance In-Charge/ Quality Assurance Officer may decide to –

- Write to the complainant about the response and asks for his response.
- Ask further clarification from the client
- Depute an auditor/inspector 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 Prime Certification & Inspection.

5.5.4 Technical Manager/Quality Assurance In-Charge/ Quality Assurance Officer shall communicate with the complainant at the end of the process detailing the findings and to formally close the complaint. Whenever possible, PCI-API gives formal notice of the complaints -handling process to the complainant.

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Title	Procedure for Complaint and Appeals			
Doc ref: QP-07A	Issue: 01	Revision: 02	Date: 08/07/2024	Page 6 of 9
Prepared by	Quality Assurance In-Charge/ Quality Assurance Officer	Approved by	Certification Manager	

PCIAPI determines, together with the certified client and the complainant, whether and, if so to what extent, the subject of the complaint and its resolution will be made public.

5.5.5 A copy of the correspondence is kept in the client file for records and the same is passed to auditor/inspector during next audit/inspection. The details of all complaints and action taken (Correction, CAPA) are discussed in Management Review and IC meeting.

5.6 Handling of Appeals

Any company or organization who fails to satisfy an audit/inspection or surveillance may appeal against the decision. Where an appeal is received the following procedure will be followed.

5.6.1 The Director /Certification Manager/ Group Chief Executive Officer will appoint the members of the appeals committee under the leadership of Director who will hear the appeal and determine the outcome. With respect to Halal certification the Halal Islamic affairs expert is one of the members of the committee. In case, Director /Certification Manager/ Group Chief Executive Officer are part of the audit/inspection/certification team, Director / Certification Manager / Group Chief Executive Officer shall not be part of the investigation process and let the other members of the Complaints and Appeals Committee to proceed with investigation for the appeals process. In such a scenario Director / Certification Manager / Group Chief Executive Officer shall approach Impartiality Committee and/or Prime Certification & Inspection team to provide decision on the appeal. The decision on the appeal shall be taken based on the decision by Complaints and Appeals Committee and the Impartiality committee. Results of the appeal will be reported to the board of directors.

- All appeals shall be received by the Technical In-Charge /Quality Assurance In-Charge/ Quality Assurance Officer and details of appeals shall be recorded in the Appeals Register maintained by the Document Controller
- Technical In-Charge/ Quality Assurance In-Charge shall investigate the appeal made and inform the client about its plan of action for investigation and action there upon.
- An investigation report (Incident Report) for each individual appeal shall be maintained by the Document Controller. In case, any further corrective action is required post actions identified and taken based on Incident report – Corrective action procedure QP04A is implemented.
- A copy of the investigation report shall be sent to the client.

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Title	Procedure for Complaint and Appeals			
Doc ref: QP-07A	Issue: 01	Revision: 02	Date: 08/07/2024	Page 7 of 9
Prepared by	Quality Assurance In-Charge/ Quality Assurance Officer	Approved by	Certification Manager	

- In case of any further ambiguity, the same shall be reviewed by the board of directors and appropriate decision arrived.
- In case the issue still remains open; the same shall be intimated to the accreditation board for its valuable comments.
- All appeals made are collated and analyzed on a yearly basis.
- Necessary corrective and preventive actions shall be taken based on the appeal trend.
- Appeal trends and corrective and preventive action taken shall also be reviewed as part of the Management committee meeting and Impartiality committee meeting.
- Technical In-Charge/ Quality Assurance In-Charge shall ensure that details with respect to the appellant and actions there upon is not shared with the audit/inspection team members.
- Technical In-Charge / Quality Assurance In-Charge shall ensure that no discriminatory action is taken against the appellant.
- The client is made aware of the appeals process and is available to him on request.

5.6.2 In case of an appeal made by a client against a decision made by auditor/inspector, Lead auditor/inspector or certification committee, the appeal shall be recorded by Document Controller and forwarded to Complaints and Appeals Committee. The committee shall review the appeal, investigate (which may include discussion with concerned client, respective auditor/inspector / lead auditor/inspector and review of audit/inspection report). The committee may also direct any other lead auditor/inspector to visit the site and determine the validity of the appeal. The decision taken by the committee shall be communicated to the client and to Technical In-Charge/ Quality Assurance In-Charge 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.

5.7 Handling of Suggestions /Opportunity for improvement

- In case of suggestion / opportunity for improvement, the source is predominantly internal and the concerned staff member submits to Quality Assurance In-Charge. The other source may be internal / external audit/inspection.
- Technical In-Charge / Quality Assurance In-Charge studies the suggestion to determine any conflict with ISO/IEC 17021, ISO/IEC 17065, ISO/TS 22003, ISO 9001, GSO 2055-2, ISO/IEC 17020, PNHCS of 2018 and Prime Certification & Inspection 's Policy. In case the suggestion is in conflict, the

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Title	Procedure for Complaint and Appeals			
Doc ref: QP-07A	Issue: 01	Revision: 02	Date: 08/07/2024	Page 8 of 9
Prepared by	Quality Assurance In-Charge/ Quality Assurance Officer	Approved by	Certification Manager	

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. Technical Manager determines the changes in existing documentation and implements through Document Change process (QP01).
- If any certified client or interested party asks for the appeal/complaint handling process, then it is forwarded to Technical In-Charge/Quality Assurance In-Charge. He will inform a certified client /any other interested party the appeals and complaint handling process of Prime Certification & Inspection if any complaints / appeals are received by certified clients / interested party.

5.8 Closing of complaint and appeal

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

4.8.2 Every client's complaints and appeals are recorded. The records are maintained by the Document Controller. 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 that concern product quality or other test characteristics are maintained by Technical Manager. Based on analysis of Client / Other Parties complaint and appeal, necessary actions are taken and client is replied for closing the complaint and appeal. Technical Manager/Quality Assurance In-Charge/ Quality Assurance Officer identifies need for taking corrective and preventive action to prevent such complaint and appeal in future and accordingly concerned person is informed.

4.8.3 All the complaint and appeal received by Organization will be closed within 7 working days after receipt of the complaint and appeal. Technical Manager / Quality Assurance In-Charge/ Quality Assurance Officer is authorized for closing of complaint and appeal.

4.8.4 All complaints related to EQM certification, PCI-API will communicate to ESMA at the beginning, progress and closing stages.

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Title	Procedure for Complaint and Appeals			
Doc ref: QP-07A	Issue: 01	Revision: 02	Date: 08/07/2024	Page 9 of 9
Prepared by	Quality Assurance In-Charge/ Quality Assurance Officer		Approved by	Certification Manager

5.0 **References**

- 5.1 QP01 Procedure for control of documents
- 5.2 QP04 Procedure for corrective and Preventive action

6.0 **Enclosures**

Nil

7.0 **Formats / Exhibits**

P/25 Incident Report

Revision Record

Issue		Revision		Process Owner	Details of Revision
No.	Date	No	Date		
01	15.12.2020	00	-	Quality Assurance In-Charge	Initial Issuance
01	15.12.2020	01	20.04.2022	Quality Assurance In-Charge	Revised header – Change of Address
01	15.12.2020	02	08.07.2024	Quality Assurance In-Charge/ Quality Assurance Officer	Align with the current function in the organization.

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