HANDLING COMPLAINTS

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1. SCOPE AND FIELD OF APPLICATION

This procedure defines the procedure for resolving objections, claims and appeals sent by users and other interested parties of the Center for Applied Circular Economy doo Šabac (hereinafter: CPCE) and the Testing Laboratory, which is an integral part of it.

The procedure refers to all activities related to the work procedure of the CPCE and the Testing Laboratory and includes receiving complaints, recording, considering, researching, making decisions, monitoring and taking measures to resolve them.

The procedure defined in this procedure applies to all types of objections and complaints, regardless of their source and subject, and within the management system includes:

1. Technical complaints (SRPS ISO/IEC 17025): They refer exclusively to requests from users or other bodies that express dissatisfaction with regard to the accuracy, reliability, confidentiality or validity of the issued test results and technical activities of the Laboratory. These objections are resolved strictly according to the technical requirements of the SRPS ISO/IEC 17025 standard.

2. Commercial and general complaints (SRPS ISO 9001): Refer to user dissatisfaction related to the general quality of the service provided, which includes delays in the preparation of reports, non-compliance with agreed service delivery deadlines, incorrect administrative data on invoices/offers or professional behavior of CPCE staff.

3. External objections and complaints in the field of safety and health at work and the environment (SRPS ISO 14001 / SRPS ISO 45001): They refer to objections and complaints from external stakeholders (inspection authorities, local community, visitors, external collaborators) regarding environmental performance (waste management, noise, wastewater) or security situations, incidents and risks in and around CPCE facilities. All complaints from this domain are recorded and resolved centrally, and the data serves as a mandatory input element for an integrated review of IMS by management.

2. NORMATIVE REFERENCES

The material presented in this procedure relies on the following documents:

- SRPS ISO/IEC 17025, General requirements for the competence of testing and calibration laboratories,
- PO.LSA.00, Manual,
- PO.IMS.00, Integrated Management System Manual
- SRPS ISO 9001, Quality Management System – Requirements
- SRPS ISO 14001, Environmental Management System – Requirements with Guidance for Use
- SRPS ISO 45001, Occupational Health and Safety Management System – Requirements with Guidance for Use
- PR.LSA.15, Nonconformity Management
- PR.LSA.06, Improvements

These documents are subject to changes, so users of this procedure are advised to use the latest edition of the above-mentioned documents.

3. TERMS, DEFINITIONS AND ABBREVIATIONS

The definitions given in ISO/IEC 17000 are applied in this procedure. For better understanding of the material presented in this procedure, the following definitions are repeated:

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Complaint – An expression of dissatisfaction made by any person, organization, or other interested party addressed to the Center for Applied Circular Economy LLC, Sabac, and its Testing Laboratory, which is an integral part of the organization, and for which a response is expected.

Complaint Resolution – A procedure applied in resolving complaints and objections from service users regarding the fairness, competence, and professionalism of the organization providing the respective service.

Abbreviations:

CPCE: Center for Applied Circular Economy LLC, Sabac
Laboratory: Testing Laboratory
OHS - safety and health at work
EMS - environmental protection

4. RESPONSIBILITIES

Quality Manager is responsible for the development, implementation, and execution of this procedure.

This procedure is applied by all individuals involved in the identification and management of complaints submitted by users and other interested parties.

General Manager is responsible for overseeing the implementation of the procedure.

General Manager:
- Is responsible for making decisions in cases of high-risk complaints (which may threaten the organization's reputation, accreditation or bring legal consequences), approving financial resources for out-of-court settlements or repeats of large cases, and reviewing complaint statistics during management reviews.

Quality Manager:
- He is responsible for receiving, implementing the protocol and confirming the receipt of the complaint to the submitter.
- Maintains a record of complaints.
- He is responsible for collecting and verifying all necessary information, as well as for ensuring that only persons who are not involved in disputed laboratory and other activities participate in the processing of complaints (to preserve impartiality).
- Formulates and sends a final written response to the complainant.
- He is responsible for solving general user complaints that are not directly related to the laboratory's technical work (objections to commercial conditions, late bids, behavior of staff in the field, etc. - SRPS ISO 9001).
- Coordinates the resolution of complaints received from state authorities or certification bodies.

Technical manager of the laboratory:
- He is responsible for conducting a technical investigation regarding complaints
- Submits a technical report to the Quality Manager.

Laboratory staff:
- It is the responsibility to immediately, without delay, forward any oral or written customer complaint to the Quality Manager and to provide all necessary information and records during the investigation.

5. DESCRIPTION OF ACTIVITIES

The objective of complaint management is to improve the quality of the company’s products and services, as well as its own management system.

Complaint management is implemented throughout the entire organization and includes:

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- involvement and engagement of top management;
- recognizing and addressing the needs and expectations of complainants;
- providing complainants with an open, effective, and user-friendly complaint resolution process;
- analyzing and evaluating complaints to improve the quality of products and services;
- reviewing the complaint handling process;
- measuring the efficiency and effectiveness of the complaint handling process.

5.1. Types of Complaints

A complaint is an expression of dissatisfaction made by any person, organization, or other interested party addressed to the Center for Applied Circular Economy LLC, Sabac, and its Testing Laboratory, which is an integral part of the organization, and for which a response is expected.

A complaint, as an expression of dissatisfaction requiring a response from CPCE and the Testing Laboratory, may relate to:

- the application of rules and procedures for conducting testing methods by the Testing Laboratory,
- compliance with contractual clauses or offers,
- contact persons,
- response time to various types of correspondence,
- service pricing,
- incorrect invoicing, etc.

A service user may submit a complaint regarding:

- the sampling or testing procedure, with a request to reconsider the decision made concerning the subject of testing,
- the interpretation or applicability of standards, technical regulations, or other documents on which the testing is based,
- the procedure for conducting the testing and/or the test results presented in the Test Report,
- opinions or interpretations provided in the Test Report.

5.2. Principles of the Complaint Resolution Procedure

The fundamental principles followed in resolving complaints within CPCE and the Testing Laboratory are as follows:

- All users of CPCE and the Testing Laboratory services, as well as other interested parties, have the right to submit a complaint regarding the activities carried out by CPCE and the Laboratory, the results of those activities, the individuals responsible for them, and similar matters.
- CPCE informs the complainant upon receipt of the complaint and notifies them whether the complaint falls within the scope of the organization.
- The complainant has the opportunity to express their dissatisfaction, be heard, and actively participate in resolving the dispute in question.
- Complaints are resolved by a commission, and the decision-makers involved in the complaint process must not be the same individuals who participated in the activities being complained about.
- Upon request, CPCE informs the complainant about the status of the complaint.
- CPCE provides written notification to the complainant about the outcome of the complaint resolution and, when necessary, contacts the complainant to coordinate the implementation of required actions.

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- The complaint resolution procedure is available to users and other interested parties and is published on the company's website. Upon request, it is also provided directly to the complainant.

5.3. Handling complaints

Complaints must be submitted in written form to CPCE, either by direct delivery on-site or by mail (electronic or regular). A complaint may also be submitted by completing and submitting a Survey Questionnaire.

All complaints received in writing or through Survey Questionnaires are reviewed and treated as if they were submitted with the designation "complaint."

All general commercial, OSH and EMS complaints are received by the Quality Manager or the person who came into direct contact with the complaint. The objection is immediately filed in PR.LSA.16-01, Record of objections in the program.

General Manager and/or Technical Manager of the laboratory is obliged to confirm receipt of all complaints, provided the complainant's contact address is available, within 10 working days from the date of submission.

An objection related to the Examination Report is considered by the CPCE only if it is submitted by an authorized person of the user within 15 days from the date of issue.

Complaints related to the Test Report are considered by CPCE only if submitted by an authorized representative of the client within 15 days from the date of issuance.

CPCE records all submitted complaints in the document PR.LSA.16-01, Complaint Record, and documents basic information about the complainant and the complaint. The records are kept by the Quality Manager.

5.3.1. Information gathering, consideration and investigation

General manager or a person authorized by General Manager appoints a member of the staff responsible for resolving the complaint.

The appointed a member of the staff may organize a commission to carry out the complaint resolution procedure.

Commission members are selected from among the employees, taking into account the absence of any conflict of interest and ensuring that they were not directly or indirectly involved in the activities subject to the complaint. This is to guarantee independence, impartiality, and objectivity.

When necessary, the commission may include a representative of the complainant, the company's legal advisor, and an external expert in the subject of testing/sampling. All participants are required to sign a Confidentiality Statement.

The commission is tasked with reviewing the submitted complaint, collecting all relevant information, conducting the necessary investigation, and making an appropriate decision.

A member of the staff responsible for resolving the complaint informs the complainant, in free-form written correspondence, about the subject of the dispute and the scheduled date of the hearing, requesting confirmation of agreement on the defined subject of the dispute.

A member of the staff handling the complaint must ensure that the hearing is conducted in an atmosphere of tolerance and mutual respect. During the hearing, participants may ask questions, make statements, and respond to inquiries. All relevant information must be recorded in the minutes, which are made available to the complainant.

The complaint resolution process may be conducted via correspondence only if the complainant agrees. In such cases, the procedure is followed as usual, except for the hearing.

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In cases where the complainant requests information about the status of the complaint (in writing or verbally), GeneralManager and/or Technical Manager of the laboratory, in cooperation with the appointed a member of the staff, provide all necessary updates on the progress of the resolution.

The commission reviews the complaint and prepares a Complaint Resolution Report. Once all relevant information is gathered, the commission drafts the report with a proposed resolution and submits it to General Manager or the authorized a member of the staff.

Based on the investigation, a decision is made regarding whether the complaint is justified and what actions should be taken.

5.3.2. Making a decision and notifying the complainant

In the complaint resolution process, General manager or a member of the staff authorized by General Manager makes the final decision, taking into account the proposed resolution provided by the commission in the complaint resolution report, along with all relevant information gathered during the process.

The complainant is notified in writing of the decision, along with an action plan. A formal response to the complaint is provided within a specified timeframe. If the complainant is not satisfied with the proposed action plan, it may be revised by the complaint resolution commission.

If the complainant is not satisfied with the decision or the manner in which it was resolved, or remains dissatisfied even after the action plan is revised, they are advised to escalate the matter to a higher authority, such as the accreditation body or another competent institution.

The notification of the decision is sent to the complainant by General Manager or a member of the staff authorized by General manager.

5.3.3. Taking Actions to Resolve Complaints

In the case of a justified complaint, actions are taken to correct the error and prevent similar situations in the future.

Based on the review of the complaint, the following actions may be taken:

- Corrective actions aimed at eliminating the root causes of identified nonconformities in the complaint resolution process (in accordance with procedure PR.LSA.15, Nonconformity Management and PR.LSA.06, Improvements);
- Corrections, if there is no need for a corrective action (in accordance with PR.LSA.15, Nonconformity Management);
- Actions related to risks and opportunities, aimed at preventing the occurrence of irregularities that caused the complainant's dissatisfaction (in accordance with PR.LSA.04, Risk and Opportunity Management).

For general commercial complaints (deadlines, invoices), the Quality Manager in cooperation with the director analyzes the cause of the delay or error and defines an immediate correction according to the user. For external OHS and ZŽS complaints (waste, safety), the Quality Manager immediately involves the Person for Waste Management or the Person for OHS for urgent field verification of allegations from complaints and elimination of environmental or safety risks.

5.3.4. Monitoring and Reporting

Actions taken based on submitted complaints are monitored, and their effectiveness is evaluated. Records are kept in the document PR.LSA.16-01, Complaint Record, which includes a brief description of all actions taken.

After the prescribed measures are implemented, their execution is monitored within the defined timeframe, along with an evaluation of their effectiveness to ensure the expected results are achieved.

If the implemented measure does not produce the expected effect, alternative solutions are sought.

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Quality Manager maintains records of complaints (PR.LSA.16-01, Complaint Record) using Microsoft Office Word.

At least once a year, during management review, the number of complaints, the methods of resolution, decisions made, actions taken, and results achieved are analyzed.

All records related to complaints are stored in the Testing Laboratory archive for a minimum of 4 years.

6. INSTRUCTIONS AND RECORDS

No instructions arise from this procedure.

The following records arise from this procedure:

- PR.LSA.16-01, Complaint Record
- Decision on the formation of the commission, free form
- Minutes of the Commission meeting, free form

7. ANEX

This procedure has no anex.

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