

# RL-AFA Addition to KRL-005 Deviation Management

<b>Document No. &amp; Name</b>	RL-AFA Addition to KRL-005 Deviation Management _EN		
<b>Purpose</b>	It was developed to add regional details to the KRL-005 Deviation Management. The purpose of this procedure is for TÜV AUSTRIA Asia & Africa and all legal entities that are partners or owners of TÜV AUSTRIA (in this procedure, the company will be referred to as TÜV AUSTRIA). It is used for the management of complaint and objection processes that affect the effectiveness of the management system, within the scope of management of conformity assessment activities.		
<b>Scope/Area of Execution</b>	This addition is only applicable for TÜV AUSTRIA Asia & Africa entities referred in Annex – C of Quality Manuals created for accreditation standards.		
<b>Fullfills the following Regulations</b>	EN ISO/IEC 17020 7.5 / 7.6 EN ISO/IEC 17021 9.7 / 9.8 EN ISO/IEC 17025 7.9 EN ISO/IEC 17065 7.13 EN ISO/IEC 17024 9.8 / 9.9 ISO 9001:2015		
<b>Applicable Documents</b>	FM-AFA-005a Suggestion, Complaint and Objection Form KFM-005b Deviation handling		
<b>Applicable Safety Requirements</b>	Not applicable		
<b>Required Competences</b>	Not applicable		
<b>Last Changes</b>	25.07.2023 – initial		
<b>Revision</b>	00		
<b>Process Owner</b>	Region Quality Manager		
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**Gender statement:** For better readability, personal terms in this document that refer to women, men or other genders at the same time are only used in the masculine form, e.g., "he" instead of "he/she". However, this is in no way intended to express gender discrimination or a violation of the principle of equality.

## 1 Key Facts

This addition is intended to manage appeals, complaints and suggestions in the TÜV AUSTRIA Asia & Africa region.

## 2 Abbreviations & Definitions

<b>Compliant</b>	TÜV AUSTRIA 's procedures, policy, service performance, permanent or temporary personnel, activities carried out within the scope of the documents it has issued, or TÜV AUSTRIA 's procedures, policies, service performance, "including those related to the accreditation body", regarding the services provided by natural or legal persons within the scope of conformity assessment. These are negative written applications made regarding any issue within the scope of its activities.
<b>Objection</b>	It is a written application made by private or legal persons against the decision taken by TÜV AUSTRIA on issues concerning them, within the scope of conformity assessment. The only condition for objection is that the decision taken by TÜV AUSTRIA is against the wishes of the objecting party and cannot be resolved through a dispute application.
<b>AFA</b>	TÜV AUSTRIA Asia & Africa Region
<b>TÜV AUSTRIA</b>	TÜV AUSTRIA refers to TÜV AUSTRIA's organizations operating in the Asia & Africa region.
<b>Objection Committee</b>	In cases where objections and complaints regarding the decisions taken by TÜV AUSTRIA regarding conformity assessment activities are not resolved using internal processes, it is aimed to examine the objection and complaint and make a decision. As an experienced committee, it is a group reporting to the General Manager, consisting of various sector representative experts from within and outside TÜV AUSTRIA. In the Objection Complaint Committee, another technical personnel who is not a party to the objection/complaint and dispute will provide expert information about the objection/complaint. The Objection Committee consists of an independent member from the company, the company's legal counsel and conformity assessment personnel not involved in the matter.

## 3 Objections and Complaints Management (New Section of KRL-005)

### 3.1.1 Examples of Objection and Compliant

Natural or legal persons (clients);

- a-) Organizations that TÜV AUSTRIA serves,
- b-) Customers of the organizations that TÜV AUSTRIA serves,
- c-) Public institutions,
- d-) Private organizations,
- e-) TÜV AUSTRIA 's customers and other members of the public,
- f-) Some of the negative written applications received "including those related to the accreditation body" regarding the services provided by other relevant parties may be on the following subjects:

- ✓ Attitudes and behaviors of the audit team or personnel,
- ✓ Compliance with the audit plan,

- ✓ Performance of the personnel involved in TÜV AUSTRIA activities,
- ✓ TÜV AUSTRIA conformity assessment activities,
- ✓ Complaints of service or product users or third parties about the organization,
- ✓ Application of the accreditation body regarding the misuse of logos and accreditation signs of certified companies,
- ✓ The service fee for the activity carried out by TÜV AUSTRIA is not accepted by the applicant organization,
- ✓ Other etc. topics

It is accepted as a complaint for TÜV AUSTRIA and is handled for evaluation. TÜV AUSTRIA collects all the information necessary to validate the complaint, verifies it and informs the complainant.

Registration is carried out after the application regarding the objection reaches TÜV AUSTRIA. Some of the issues that will be considered as objections:

- ✓ The complaint is not accepted by TÜV AUSTRIA,
- ✓ As a result of the complaint, the complainant does not accept the activity carried out by TÜV AUSTRIA,
- ✓ The decision taken as a result of the complaint investigation is not accepted by the complainant,
- ✓ Suspension of the document,
- ✓ Cancellation of the document,
- ✓ Failure to issue a Certificate/Report,
- ✓ The decision not to expand the scope,
- ✓ Failure to issue a certification scope or certificate,
- ✓ Failure to respond positively to all or part of the applied scope (at the end of the application or evaluation process),
- ✓ Other

### 3.1.2 Processing of Objection or Complaint

TÜV AUSTRIA is responsible for decisions at all stages of complaint and objection handling. The acceptance, investigation and decision of the complaint or objection must not result in any discriminatory action against the complainant or objector.

A complaint received outside the activities of TÜV AUSTRIA is answered and clarified on condition that the customer is informed. Complaint-Objection processes must be completed within a maximum of 3 months, from the receipt of the complaint-objection until the final decision is delivered to the customer.

TÜV AUSTRIA fills out and processes the FM-AFA-005a Suggestion, Complaint and Objection Form in order to confirm whether the complaint / objection is related to its activities. If the complaint relates to its own activities mentioned above, it must address the complaint. In addition, if the complaint is about a customer certified by TÜV AUSTRIA, the relevant customer is informed by taking into account the effectiveness of the certified management system in questioning the complaint.

TÜV AUSTRIA compliance is responsible for collecting and verifying all information necessary to validate the complaint.

The objection and complaint handling process should include at least the following elements and methods:

- a) Taking into account previous similar objections, objections; outlines the process for obtaining, validating and investigating and deciding on actions to be taken in response,
- b) Monitoring and recording objections, including activities to resolve objections,
- c) Ensuring the appropriate correction and corrective action to be taken.

### 3.1.3 First Notice to Client

TÜV AUSTRIA formalizes the complaint or objection with the Suggestion, Objection and Complaint Form and notifies the customer that this complaint or objection has been received through communication channels within 15 days at the latest.

This could be by phone, email or any communication type by compliance team.

### 3.1.4 Verification and Control

TÜV AUSTRIA is responsible for collecting (to the extent possible) and verifying all information necessary for a decision on the existing complaint or objection.

By using internal communication, the situation regarding the certification activity that is the subject of objection and complaint is clarified .

### 3.1.5 Decision

The decision resolving the complaint or objection is managed by the person/persons who are not involved in the product - service - process certification, inspection, testing, system and personnel certification activities that are the subject of the complaint or application. To ensure that there is no conflict of interest, TÜV AUSTRIA; It does not use personnel who have provided consultancy to a client or have been employed by a client in reviewing or approving the resolution of a complaint or objection of that client for a period of two years following the termination of the consultancy or employment. Complaints and objections are conveyed to the Compliance and/or Quality Unit, which is independent from TÜV AUSTRIA operations.

When the solutions and practices developed for the relevant complaint or objection are deemed appropriate and sufficient by the customer and agreed upon, the relevant activities are initiated.

Following the decision taken in agreement with the customer as a result of the evaluation process, TÜV AUSTRIA Department Manager and Management Representative monitor the necessary nonconformities step by step and carry out the necessary work with precision.

Corrective/preventive action is initiated to resolve the issue underlying the complaint. If necessary, an extraordinary internal audit (special audit) can be carried out in the relevant department/process.

### 3.1.6 Objection and Complaint Committee

In cases where there is no agreement with the customer regarding the solution of the complaint and objection, the process is transferred to the Objection Complaint Committee. Information about the relevant committee and its working principles is provided to the customer through the procedure published on the website.

The Objection and Complaint Committee consists of 2 full members of Impartiality Committee appointed by the General Manager of TÜV AUSTRIA.

The Objection and Complaint Committee consists of a chairman and two members. One member consists of another auditor who is not a party or subject to conformity assessment processes (system, personnel, inspection, test, product, etc.) or personnel who are knowledgeable about the relevant technical subject.

Other matters related to the working principles of the committee are defined below:

- ✓ Committee membership occurs in person and there is no proxy system for members.
- ✓ At least 2 members must be present for the committee to meet.
- ✓ Unanimity of the members is required to make decisions at the meetings.
- ✓ The decisions taken are recorded in the KFM-002g Template meeting log and are signed and approved by the participants.
- ✓ The decision taken is officially notified to both TÜV AUSTRIA and the customer.

Committee members warn the management of TÜV AUSTRIA in case the decisions taken are not implemented by TÜV AUSTRIA or when a situation arises that would disrupt the impartiality of TÜV

AUSTRIA. If no result is obtained from the warning, Committee members are obliged to report the situation to the accreditation body.

### 3.1.7 Result Notification

TÜV AUSTRIA officially notifies the customer of the outcome of the complaint or objection (the solution agreed with the customer or the solution from the Objection Complaint Committee) within 30 days with the FM-AFA-005a Suggestion, Complaint and Objection Form. Notification is made by the Quality Unit.

## 4 Deviation(s) (New Section of KRL-005)

The relevant Department Manager or responsible persons, whose verification is made regarding the issues subject to the Objection and Complaint, investigates the process in order to eliminate or prevent the recurrence of such nonconformities and corrective/preventive actions are initiated in accordance with KRL-005 Deviation Management.

## 5 Confidentiality (New Section of KRL-005)

Of this procedure is confidential and will not be disclosed to third parties under any circumstances, except for the organization that accredits TÜV AUSTRIA when necessary. When it is mandatory to provide information to third parties by law, the applicant is informed of this situation (if it is legal to inform the customer).

TÜV AUSTRIA determines, together with the customer and the complainant, the subject of the complaint and whether its solution will be made public, and if so, to what extent.

If the parties agree that there is an issue that needs to be reported to the public, this notification is made through the website.

## 6 Revision History

The list below provides a list of changes to this quality document over time.

#	Revision Date	Revision Description	Review
00	25.07.2023	Initial publication	-