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| **1****COMPLAINTS**  |
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| POLICY NUMBER | GFS-SUPP PROCESS-002 |
| **Scope**This specification provides guidance on the system of complaints handling, related to the services and products provided by GFS, including planning, design, operation, maintenance and improvement. This complaints-handling specification forms a vital part of our HSEQ Management System and is complying to ISO 10002. The scope of this Process applies to all GFS operations. This specification supports the Core and Support processes within the HSEQ MS Mapping.**Contents**1. Scope
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**COMPLAINTS**

1. **SCOPE**

This specification provides guidance on the system of complaints handling related to the services and products provided by GFS, including planning, design, operation, maintenance and improvement. This complaints-handling Process forms a vital part of our HSEQ Quality Management System and is in, compliance to **ISO10002 and elements of ISO18788/45001/31000 and 9001**. The scope of this specification applies to all GFS operations in the UK.

The specification is not a rigid work instruction but is a guide to good practice. If the recommendations are not followed in practice any deviations will be assessed against RISK to business, customer or other statutory and regulatory requirements. If the risk is mitigated and can be justified it will be determined that the overall process meets the HSEQ MS requirement. If deviations cannot be justified and this poses a risk to the health, safety, environmental aspects or quality of business processes a non-conformance may be raised by the Compliance Manager which will be controlled through the non-conformance register, allocated to a member of staff for delivery and reviewed during departmental meetings.

This specification addresses the following aspects of complaints handling:

* Enhancing customer satisfaction by creating a customer and consumer focused environment that is open to feedback (including complaints), resolving any complaints received, and enhancing the organisation’s ability to improve its product and customer service.
* Senior Management Team (SMT) involvement and commitment through adequate acquisition and deployment of resources, including personnel training.
* Recognising and addressing the needs and expectations of complainants.
* Providing complainants with an open, effective and easy-to-use complaints process.
* Analysing and evaluating complaints in order to improve the health, safety, environmental aspects product and customer service quality.
* Auditing of the complaints-handling process.
* Reviewing the effectiveness and efficiency of the complaints-handling process.

This specification is not intended to change any rights or obligations provided by applicable statutory or regulatory requirements.

**2 NORMATIVE REFERENCES**

The following referenced documents are indispensable for the application of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

**ISO18788 - Management System for Private Security Operations**

**ISO45001 - Occupational Health and Safety**

**ISI31000 - Risk Management**

**ISO9001 - Quality Management System Requirements**

**ISO10002 - Complaints Management**

**BS7960 - Door Supervision**

**BS7499 - Security Guarding and Mobile Patrols**

**BS8507 1 - Close Protection in the UK**

**BS8507 2 - Close Protection Overseas**

**BS8406 - Events stewarding**

**3 TERMS AND DEFINITIONS**

**3.1 Complainant**

Person, organisation (or its representative), making a complaint.

**3.2 Complaint**

Expression of dissatisfaction made to an organisation, related to its products, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected.

**3.3 Customer**

Organisation or person that receives a product or service – i.e. Consumer, client, end-user, retainer, beneficiary and purchaser.

**3.4 Customer Satisfaction**

Customer’s perception of the degree to which the customer’s requirements have been fulfilled

**3.5 Customer Service**

Interaction of the organisation with the customer, throughout the life cycle of a product.

**3.6 Feedback**

Opinions, comments and expressions of interest in the products or the complaints-handling process.

**3.7 Interested Party**

Person or group having an interest in the performance or success of the organisation

**3.8 Objective**

Complaints-handling or something sought, or aimed for, related to complaints handling.

**3.9 Policy**

Complaints-handling or overall intentions and direction of the organisation related to complaints handling, as formally expressed by top management.

**3.10 Process**

Set of interrelated or interacting activities which transform inputs into outputs

**4 GUIDING PRINCIPLES**

**4.1 General**

GFS shall adhere to the guiding principles set out in **4.2** to **4.10** to ensure the effective handling of complaints.

**4.2 Visibility**

Information about how and where to complain is effectively communicated to customers, personnel and other interested parties via:

* + GFS Staff Handbook and Induction training.
	+ Client Meetings.

**4.3 Accessibility**

This complaints-handling specification is easily accessible to all complainants, providing clear and concise guidance on the details of making and resolving complaints. The complaints-handling specification and supporting information shall:

* + Be easy to understand and use.
	+ The information shall be in clear language.
	+ Information and assistance in making a complaint is provided on our GFS Customer Complaint Form. This form shall, if required, be made available, in whatever languages or formats the products were offered or provided in, including alternative formats, such as large print, Braille or audiotape, so that no complainants are disadvantaged.

**4.4 Responsiveness**

Receipt of each complaint shall be acknowledged to the complainant immediately by email, letter or phone call with details of this contact annotated to the Customer Action Report. Complaints shall be addressed promptly in accordance with their urgency as decided by the Compliance Manager. For example, significant health and safety issues shall be processed immediately. The complainants shall be treated courteously and be kept informed of the progress of their complaint through the complaints-handling process.

**4.5 Objectivity**

Each complaint shall be addressed in an equitable, objective and unbiased manner through the complaints-handling process.

**4.6 Charges**

Access to the complaints-handling process shall be free of charge to the complainant.

**4.7 Confidentiality**

Personally, identifiable information concerning the complainant shall be available where needed, but only for the purposes of addressing the complaint within the organisation and shall be actively protected from disclosure, unless the customer or complainant expressly consents to its disclosure.

**4.8 Customer-Focused Approach**

The organisation shall adopt a customer-focused approach, shall be open to feedback including complaints, and shall show commitment to resolving complaints by its actions.

**4.9 Accountability**

The Compliance Manager is accountable for identifying and reporting on the actions and decisions of the organisation with respect to the handling of complaints.

**4.10 Continual Improvement**

The continual improvement of the complaints-handling process and the health, safety, environmental aspects and quality of products shall be a permanent objective of the organisation, and shall be reviewed at the periodic SMT meetings.

**5 COMPLAINTS-HANDLING FRAMEWORK**

**5.1 Commitment**

The organisation shall be actively committed to effective and efficient complaints handling. It is particularly important that this is shown by, and promoted from, the organisation’s SMT.

A strong commitment to responding to complaints, shall allow both personnel and customers to contribute to the improvement of the organisation’s products and processes.

This commitment shall be reflected in the definition, adoption and dissemination of policy and procedures for the resolution of complaints. Management commitment shall be shown by the provision of adequate resources, including training.

**5.2 Process**

The SMT have established this explicit customer-focused complaint-handling process. This process is made available to, and known by, all personnel as detailed in our Staff Handbook. This process is also available to customers and other interested parties. This process shall be supported by procedures and objectives (See Sec 6) for each function and personnel role included in the process.

When establishing the policy and objectives for the complaints-handling process, the following factors have been considered:

* + Any relevant statutory and regulatory requirements.
	+ Financial, operational and organisational requirements.
	+ The input of customers, personnel and other interested parties.

The policies related to human rights, equality, health, safety, environmental, quality and complaints handling shall be aligned.

**5.3 Responsibility and authority**

**5.3.1 The SMT shall be responsible for the following:**

* + - Ensuring that the complaints-handling process and objectives are established within the organisation.
		- Ensuring that the complaints-handling process is planned, designed, implemented, maintained and continually improved in accordance with the complaints-handling policy of the organisation.
		- Identifying and allocating the management resources needed for an effective and an efficient complaints-handling process.
		- Ensuring the promotion of awareness of the complaints-handling process and the need for a customer focus throughout the organisation.
		- Ensuring that information about the complaints-handling process is communicated to customers, complainants, and, where applicable, other parties directly concerned in an easily accessible manner.
		- Appointing a complaints-handling management representative, The Operations Manager, and clearly defining his responsibilities and authority in addition to the responsibilities and authority set out in **5.3.2**.
		- Ensuring that there is a process for rapid and effective notification to top management of any significant complaints. This will be achieved by the Operations Manager personally contacting each relevant SMT member, as deemed appropriate, and then confirming details of the complaint via email to them all.
		- Periodically reviewing the complaints-handling process at each SMT, to ensure that it is effectively and efficiently maintained and continually improved

**5.3.2 The complaints-handling management representative(Compliance Manager), shall be responsible for the following:**

* + - Establishing a process of performance monitoring, evaluation and reporting.
		- Reporting to the SMT on the complaints-handling process, with recommendations for improvements.
		- Maintaining the effective and efficient operation of the complaints-handling process, including the recommendation for; the recruitment and training of appropriate personnel, technology requirements, documentation, setting and meeting target time limits and other requirements, and process reviews.

**5.3.3 Other Managers involved in the complaints-handling process shall, as applicable within their area of responsibility, be responsible for the following:**

* + - Ensuring that the complaints-handling process is implemented.
		- Liaising with the complaints-handling management representative.
		- Ensuring the promotion of awareness of the complaints-handling process and of the need for a customer focus.
		- Ensuring that information about the complaints-handling process is easily accessible.
		- Reporting on actions and decisions with respect to complaints handling.
		- Ensuring that monitoring of the complaints-handling process is undertaken and recorded.
		- Ensuring that action is taken to correct a problem, prevent it happening in the future, and that the event is recorded in compliance to our Conformance Process.
		- Ensuring that complaints-handling data is available for the SMT review.

**5.3.4 All personnel in contact with customers and complainants shall:**

* + - Be trained in complaints handling.
		- Comply with any complaints-handling reporting requirements determined by the organisation.
		- Treat customers in a courteous manner and promptly respond to their complaints or direct them to the appropriate individual, and show good interpersonal and good communication skills.
		1. **All personnel shall:**
		- Be aware of their roles, responsibilities and authorities in respect of complaints.
		- Be aware of what procedures to follow and what information to give to complainants, and report complaints which have a significant impact on the organisation.
1. **PLANNING AND DESIGN**

**6.1 General**

The organisation has planned and designed this effective and efficient complaints-handling process, in order to increase customer loyalty and satisfaction, and also to improve the human rights, equality, health, safety, environmental aspects and quality of the product provided. This process shall comprise a set of interrelated activities that function harmoniously and use various personnel, information, material, financial and infrastructure resources to conform to the complaints-handling policy and achieve the objectives. The organisation shall consider the best practices of other organisations with regard to complaints handling.

**6.2 Objectives**

The SMT shall ensure that the complaints-handling objectives are established for relevant functions and levels within the organisation. These objectives shall be measurable and consistent with the complaints-handling policy. These objectives shall be set annually as detailed performance criteria.

**6.3 Activities**

The SMT shall ensure that the planning of the complaints-handling process is carried out in order to maintain and increase customer satisfaction. The complaints-handling process may be linked to and aligned with other processes of the HSEQ Management System of the organisation.

**6.4 Resources**

In order to ensure that the complaints-handling process operates effectively and efficiently, the SMT shall assess the needs for resources at each periodic SMT meeting and provide them. These include resources such as personnel, training, procedures, documentation, specialist support, materials and equipment, computer hardware and software, and finances. The selection, support and training of personnel involved in the complaints-handling process are particularly important factors.

1. **OPERATION OF COMPLAINTS-HANDLING PROCESS**

**7.1 Communication**

Information concerning the complaints-handling process, such as this process, the Staff Handbook and electronic-based information shall be made readily available to customers, complainants and other interested parties. Such information shall be provided in clear language and, so far as is reasonable, in formats accessible to all, so that no complainants are disadvantaged. The following are examples of such information:

* + Where complaints can be made.
	+ How complaints can be made.
	+ Information to be provided by the complainant.
	+ The process for handling complaints.
	+ Time periods associated with various stages in the process.
	+ The complainant’s options for remedy, including external means.
	+ How the complainant can obtain feedback on the status of the complaint.

**7.2 Receipt of complaint**

Upon reporting of the initial complaint to the Compliance Manager, the complaint shall be recorded with supporting information and a unique identifier code. If the initial complaint is made to another member of GFS then the Complaints Initial Information Form, **a stakeholder form** shall be completed by the complaint recipient and passed to Management for action. The record of the initial complaint shall identify the remedy sought by the complainant and any other information necessary for the effective handling of the complaint including the following:

* + A description of the complaint and relevant supporting data, including the products or related organisation practices complained about and the requested remedy.
	+ The due date for a response.
	+ Data on people, department, branch, organisation and market segment, if applicable.
	+ Immediate action taken (if any).

**7.3 Tracking of complaint**

The complaint shall be tracked from initial receipt through the entire process until the complainant is satisfied or the final decision is made. An up-to-date status shall be made available to the complainant upon request and at regular intervals, at least at the time of pre-set deadlines.

**7.4 Acknowledgement of complaint**

Receipt of each complaint shall be acknowledged to the complainant immediately (for example via post, phone or e-mail).

**7.5 Initial assessment of complaint**

After receipt, each complaint shall be initially assessed in terms of criteria such as severity, safety implication, complexity, impact, and the need and possibility of immediate action by Operations/other departments.

**7.6 Investigation of complaints**

Every reasonable effort shall be made to investigate all the relevant circumstances and information surrounding a complaint. The level of investigation shall be commensurate with the seriousness, frequency of occurrence and severity of the complaint as deemed by the Compliance Manager. Depending on the details of the complaint, the Compliance Manager will raise either a Corrective or Preventative Action Plan, in accordance with our Conformance Processes.

**7.7 Response to complaints**

Following an appropriate investigation, the organisation shall offer a response. If the complaint cannot be immediately resolved, then it shall be dealt with in a manner intended to lead to its effective resolution as soon as possible.

**7.8 Communicating the decision**

The decision or any action taken regarding the complaint, which is relevant to the complainant or to the personnel involved, shall be communicated to them as soon as the decision or action is taken.

**7.9 Closing the complaint**

If the complainant accepts the proposed decision or action, then the decision or action shall be carried out and recorded.

If the complainant rejects the proposed decision or action, then the complaint shall remain open. This shall be recorded and the complainant shall be informed of alternative forms of internal and external recourse available.

The organisation shall continue to monitor the progress of the complaint, until all reasonable internal and external options of recourse are exhausted, or the complainant is satisfied.

**8 MAINTENANCE AND IMPROVEMENT**

**8.1 Collection of information**

The organisation shall record the performance of its complaints-handling process. The organisation shall establish and implement procedures for recording complaints and responses and for using these records and managing them, while protecting any personal information and ensuring the confidentiality of complainants. This shall include the following:

* + Specifying steps for identifying, gathering, classifying, maintaining, storing and disposing of records.
	+ Recording its handling of a complaint and maintaining these records, taking utmost care to preserve such items as electronic files and magnetic recording media, since records in these media can be lost as a result of mishandling or obsolescence.
	+ Keeping records of the type of training and instruction that individuals involved in the complaints-handling process have received.
	+ Specifying the organisation’s criteria for responding to requests for record presentation and record submissions made by a complainant or his or her agent; this may include time limits, what kind of information will be provided, to whom, or in what format.
	+ Specifying how and when statistical non-personally identifiable complaints data are disclosed to the public.

**8.2 Analysis and evaluation of complaints**

All complaints shall be classified and then analysed to identify systematic, recurring and single incident problems and trends, and to help eliminate the underlying causes of complaints.

**8.3 Satisfaction with the complaints-handling process**

There shall be regular action taken to determine the levels of satisfaction of complainants, with the complaints-handling process. This may take the form of random surveys of complainants and other techniques.

**8.4 Monitoring of the complaints-handling process**

Continual monitoring of the complaints-handling process, the resources required (including personnel), and the data to be collected shall be undertaken.

The performance of the complaints-handling process shall be measured against predetermined criteria.

**8.5 Auditing of the complaints-handling process**

The organisation shall evaluate the performance of the complaints-handling process by completing annual internal audits. The audit shall provide information on process conformity to complaints-handling procedures, and process suitability to achieve complaints-handling objectives.

The complaints-handling audit shall be conducted as part of the HSEQ MS audit. The audit results shall be considered in the management review to identify problems and introduce improvements in the complaints-handling process. The audit shall be carried out by competent individuals independent of the activity being audited.

* 1. **Management review of the complaints-handling process**
		1. The SMT shall review the complaints-handling process at

Periodic SMT/MRM meetings in order:

* + - To ensure its continuing suitability, adequacy, effectiveness and efficiency.
		- To identify and address instances of nonconformity with health, safety, environmental, customer, regulatory and other legal requirements.
		- To identify and correct product or service deficiencies.
		- To identify and correct process or service deficiencies.
		- To assess opportunities for improvement and the need for changes to the complaints-handling process and products offered.
		- To evaluate potential changes to the complaints-handling policy and objectives.
		1. The input to management review shall include information on:
		- Internal factors such as changes in the policy, Risk, objectives, organisational structure, resources available, and products offered or provided.
		- External factors such as changes in legislation, interested parties, competitive practices or technological innovations.
		- The overall performance of the complaints-handling process, including customer satisfaction surveys and the results of the continual monitoring of the process.
		- The results of audits.
		- The status of corrective and preventive actions.
		- Follow up actions from previous management reviews, and recommendations for improvement.
		1. The output from the management review shall include:
		- Decisions and actions related to improvement of the effectiveness and efficiency of the complaints-handling process.
		- Proposals on product improvement and decisions and actions related to identified resource needs (e.g. training programmes).

Records from management review shall be maintained and used to identify opportunities for improvement.

* 1. **Continual improvement**

The organisation shall continually improve the effectiveness and efficiency of the complaints-handling process. As a result, the organisation can continually improve the health, safety, environmental aspects and quality of its products and services. This can be achieved through corrective and preventive actions and innovative improvements. The organisation shall act to eliminate the causes of existing and potential problems leading to complaints, in order to prevent recurrence and occurrence, respectively. The organisation shall:

* + Explore, identify and apply best practices in complaints handling.
	+ Foster a customer-focused approach within the organisation.
	+ Encourage innovation in complaints-handling development, and recognise exemplary complaints-handling behaviour.

**9. ANNEX**

A - **GFS-FRM-011** Complaints Initial Information Form

B - **GFS-FRM-012** Complaints Report Form

C - **GFS-FRM-013** Complainant Form

**10. DOCUMENT REVISION HISTORY**

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| February 2018 | Issue 1 | Initial Document |
| July 2020 | Issue 1 | Date and Content Revision |
| July 2021 | Issue 1 | Date and Content Revision |
| August 2022 | Issue 1 | Date and Content Revision |
| May 2023 | Issue 1 | HESQ MS Inclusion |
| July 2023 | Issue 1 | Annual Review |
| December 2023 | Issue 1 | Review for ISO18788 |