



Procedure for Complaints and Appeals

BQTL/CD/QSP/9.7/01

Standard Reference IS/ISO/IEC 17021-1:2015 [Clause No. 9.7]

1. Purpose:

This method establishes a system for managing complaints, appeals, and issues about the certification system of Basil Quality Test Lab Pvt. Ltd. Certification Division.

2. Scope:

This method applies to all Basil Quality Test Lab Pvt. Ltd. Certification Division employees and offices. It applies to the following categories of complaints:

1. Complaints about Basil Quality Test Lab Pvt. Ltd. Certification Division's personnel or services.
2. Complaints about Basil Quality Test Lab Pvt. Ltd. Certification Division's clients.
3. Appeals and Disputes (i.e. disagreement or dissatisfaction with FLPL (Certification Division)).

Exclusion: The Basil Quality Test Lab Pvt. Ltd. Certification Divisions or agents may not use this procedure to file complaints regarding other Basil Quality Test Lab Pvt. Ltd. Certification Division workers, agents, or internal services.

3. References:

BQTL/QM/01 Quality Manual

BQTL/CD/QSP/10.2.7/01 Procedure for Corrective and Preventive Action.

4. Definition:

Complaint: A formal expression of dissatisfaction about Basil Quality Test Lab Pvt. Ltd. Certification Division's personnel, services, and/or clients. The notifications may take many forms e.g. verbally, in letters or e-mails. This may be received from the stake holder like Accreditation Body, Regulatory Body, User Company or any other body/individual or as feedback to survey.

Appeal: An appeal is a notification received by Basil Quality Test Lab Pvt. Ltd. Certification Division from a client or a user company, expressing a non-agreement with a decision made or provided by Basil Quality Test Lab Pvt. Ltd. Certification Division.

User Company: A customer of Basil Quality Test Lab Pvt. Ltd. Certification Division certified client.

5. Responsibilities: CEO is overall responsible for the managing and monitoring of this procedure: -

- Appointing the investigation officer for the received and registered complaints,
- Identifying and deciding the course of actions (both corrective and preventive),
- Intimating the complainant of the status of course of actions through Quality Manager, if he/she is not involved.
- Final authority to determine on course of actions recommended by designated complaint investigating officer
- Passing needful instructions to sub-ordinates or divisions on allocation of resources as required for completing investigation.



Quality Manager, deemed as coordinator, shall be responsible for: -

- Regular maintenance and updating of BQTL/CD/ANX/04 (Complaint Handling Register).
- Coordination and first hand contact for complaints.
- Monthly reporting of complaints of summary to Management.
- Coordination and maintaining communication with complainant.

Appeals Committee (designated by Advisory Committee Chairman in para 7.2.3 of this procedure) shall be responsible for second-line resolution of appeals where complainant is not persuaded of the outcomes of the appeals review took up in the first line resolution by CEO.

Investigation officer/Manager (as designated) shall be responsible for: -

- conducting investigation,
- root cause analysis,
- suggesting or recommendation

A person who is in charge of handling complaints will not be permitted to take part in the complaint handling process in any way if they are involved in the complaint or its cause. The CEO will replace the individual in question with another qualified candidate.

6. Procedure of Complaints:

6.1. General:

Before being entered into the BQTL/CD/ANX/04 Complaint Handling Register, the Quality Manager must classify and determine whether the complaint is about Basil Quality Test Lab Pvt. Ltd.'s Certification Division (including its employees) or its clients. If the complaint relates to a certified client, then examination of the complaint shall consider the effectiveness of the certified management system. This classification, which is described in subsections 6.2 and 6.3 of this procedure, will determine the next steps in the inquiry, information validation, and remedial action.

The complainant will be kept informed at every stage by the Basil Quality Test Lab Pvt. Ltd. Certification Division. Additionally, the division will decide, in consultation with the client or complainant, how much of the complaint and/or resolution will be made publicly available, such as through newspaper ads, websites, and other media, while maintaining confidentiality. Acknowledgement of each complaint shall be provided in writing to the complainant within 3 working days of receipt. This will, however, be accessible for Accreditation Board audits and verification reviews upon request.

During the Management Review, every complaint will be examined to identify any shortcomings and then used as a component of remedial measures to enhance the process. Those who conducted the audits and made the certification determinations are always distinct from those involved in the complaint-handling process. The complainant cannot be subjected to discriminatory treatment as a result of the complaint's submission, investigation, or resolution.

The complaints-handling process shall include at least the following elements and methods:

- a) an outline of the process for receiving, validating, investigating the complaint, and for deciding what actions need to be taken in response to it;
- b) tracking and recording complaints, including actions undertaken in response to them;
- c) ensuring that any appropriate correction and corrective action are taken.



NOTE ISO 10002 provides guidance for complaints handling.

6.2. Processing of Complaints about BQTL (Certification Division):

Within a day of receiving a complaint, the Quality Manager enters the pertinent information on BQTL/CD/ANX/04 (Complaint Handling Register). The CEO is then informed of the complaint's specifics, and after assessing the complaint's seriousness, he or she must select or assign an independent investigator (one unrelated to the complaint's content) within three more days of the Quality Manager's notification. The CEO is in charge of allocating resources for the investigation of complaints and, as such, is also in charge of guiding or training all departments and individuals as needed to finish the inquiry.

The investigation shall be used to establish a trail of events using following ways: -

- Identify the cause of the problem and gather and verify all necessary information for verifying the chain of events.
- Recording of statements of the Basil Quality Test Lab Pvt. Ltd. Certification Division employees (the subject of complaint).
- Recording of statements of complainants.

Within the shortest amount of time, the designated investigator will look into the complaint and determine the root cause. However, since a transparent and equitable investigation might necessitate a thorough examination of numerous concerns, there shouldn't be a set timeframe for doing it. After the inquiry is over, the chosen investigator must provide the CEO with a thorough report and suggestions, which may take any form. The CEO will have the discretion to accept and partially or fully adopt recommendations. Nonetheless, there must be a documented explanation for disregarding advice. The investigation report and its recommendations will serve as the foundation for future preventive measures and remedial measures.

Once agreement has been reached on satisfactory resolution of the complaint, the Quality Manager shall: -

- Update the complaint form,
- Provide written confirmation of the action to complainant that will be or has been taken to resolve complainant's grievance.

The complainant must be informed of their right to appeal the way their complaint was handled before an appeals panel, in addition to being informed of the steps taken to address their issue. That is, the complainant may submit a written appeal to the Appeals panel if they are dissatisfied with how their complaint was handled by Basil Quality Test Lab Pvt. Ltd. Certification Division.

6.3. Processing of Complaints about Basil Quality Test Lab Pvt. Ltd. Certification Division's Clients:

Any valid complaint about a certified client shall also be referred by the BQTL certification division to the certified client in question at an appropriate time. The pertinent information is entered on BQTL/CD/ANX/04 (Complaint Handling Register) as soon as a complaint is received. The CEO receives the complaint form along with other pertinent information. After evaluating the complaint's importance, the CEO assigns it to an officer or investigation manager. When circumstances allow, the Quality Manager will act as an investigator for complaints from certified clients of Basil Quality Test Lab Pvt. Ltd. Certification Division about violations of



certification standards. The CEO has the last say over the investigation's methodology and resources if a complaint is decided to be looked into. Such investigations' progress will be reported as previously said.

Depending on how serious the complaint is, the CEO may decide to notify the client that is the target of a complaint that Basil Quality Test Lab Pvt. Ltd. Certification Division is looking into the complaint within 2-4 weeks of the decision. The client who is the subject of the complaint may also be notified of the investigation's findings. However, the following conditions must be met in order for the disclosure's content to be legally governed:

- Degree and type of information given to a third-party is governed by Basil Quality Test Lab Pvt. Ltd. Certification Division's Rules relating to confidentiality.
- Identity of the complainant shall not be disclosed without the complainant's expressed permission to do so.

Within seven days of receiving the complaint, the investigating officer must draft a letter, signed by the manager, explaining Basil Quality Test Lab Pvt. Ltd. Certification Division's responsibilities to the complainant if the complaint is only about a lack of service or a business dispute. The Quality Manager completes the entries and updates the Complaint and Appeal Handling Register after the necessary action has been taken. The Basil Quality Test Lab Pvt. Ltd. Certification Division's Complaint and Appeals policy permits the complainant to file an appeal in line with the appeals procedure described in paragraph 7 if they are dissatisfied with the complaint resolution. The Basil Quality Test Lab Pvt. Ltd. Certification Division will confirm the continuation of the food safety management system's efficacy in cases involving complaints against certified clients. The BQTL shall be responsible for all decisions at all levels of the complaints-handling process.

6.4 Corrective and Preventive Action:

The following corrective and preventive measures must be taken when a complaint relates to Basil Quality Test Lab Pvt. Ltd. Certification Division certification activities and is confirmed by investigations:

- Counselling and training of the concerned employees or all,
- Provisioning of resources to bring improvement in transparency and compliance
- Other corrective/preventive action as required depending upon the course of investigation
- Where complaint pertain to certified clients regarding violation of certification norms and further validated from investigation, corrective and preventive actions shall include:-
 - Suspension and withdrawal of certificate,
 - Fines
 - Other corrective/preventive action as required depending upon course of the investigation.

7 Procedure of Appeals:

7.1 General:

Within 14 days of being formally informed of the certification decision or the conclusion of the complaint investigation process, a complainant has the right to reply in writing with justification and a request for an appeal if they disagree with the certification decision of Basil Quality Test Lab Pvt. Ltd. Certification Division or with the issues mentioned in section 6 of this procedure. The Quality Manager or CEO will advise the client on the appeals process. The CEO will initially



attempt to settle the issue in accordance with the guidelines outlined in paragraph 7.2.1 of the appeals procedure in the first line response to the appeal filed by the complainant (referred to as the appellant).

All appeals shall be recorded and tracked in the Appeals register (BQTL/CD/ANX/04) in the same manner as complaints to ensure monitoring and closure. Confidentiality shall be maintained for all appeals including the identity of the appellant, except where disclosure is required by law or agreed by the appellant.

The appellant has the right to use the appeals panel process, which is described as the second line resolution in paragraph 7.2.2, if the client is still unhappy with the outcome of this first line resolution (or review). The appeals process will be made available to the public (either on a public website or in hard copy). If necessary, the Quality Manager will also assist the appellant in filing an appeal by providing appeals application forms BQTL/CD/ANX/14 (Complaint/Appeals/Concern Registration Form)

In every instance, the individuals who conducted the audits and rendered the certification determinations are distinct from those involved in the appeals handling and decision-making processes (taking the decision, reviewing the decision, and approving the decision). The decision to be communicated to the appellant shall be made by, or reviewed and approved by, individual(s) not previously involved in the subject of the appeal.

Appeals cannot be submitted, investigated, or decided in a way that discriminates against the appellant.

7.2 Procedure of Appeals:

Only written appeals may be submitted via letter, email, web portal, etc. Upon receipt, it must be noted with a unique identification number and delivered to the appellant with an acknowledgement. Additionally, a preliminary assessment must be carried out to verify the appeal's legitimacy. Following an investigation, the appellant must get a written response to each appeal within a reasonable time frame (often less than 30 calendar days). An intermediate progress report must be submitted to the appellant if the investigation is anticipated to take longer than one month. Decisions about what to do must be made in light of the investigation's findings. It is necessary to consider the outcome of any prior comparable appeals while acting. According to the BQTL/CD/QSP/10.2.7/01Procedure for Corrective and Preventive Action and clauses 7.2.6 and 6.4 of this procedure, reoccurring or significant problems with the FSMS AND FSSC 22000 system will necessitate correction, root cause analysis, and corrective action to stop the recurrence. The appeals-handling process shall include at least the following elements and methods:

- a) an outline of the process for receiving, validating and investigating the appeal, and for deciding what actions need to be taken in response to it, taking into account the results of previous similar appeals;
- b) tracking and recording appeals, including actions undertaken to resolve them;
- c) ensuring that any appropriate correction and corrective action are taken.

The BQTL shall give formal notice to the appellant of the end of the appeals-handling process.

7.2.1 First Line Resolution:



The CEO will attempt to address the matter by doing additional research in a manner similar to that described in section 6 of this procedure as the first line response to the appeal filed by the complainant (henceforth referred to as the appellant). The appellant will be informed of FLPL's (Certification Division) ongoing appeals inquiry. Within three days after the investigation's end, the CEO will notify the appellant in writing of the investigation's findings and ultimate decision.

7.2.2 Second Line Resolution:

According to the guidelines outlined in the Appeals Committee's constitution in 7.2.3 of this sectional procedure on Appeals, the CEO will send the case to the Appeals Committee, which is chosen by the Chairman of the Advisory Committee, when the appellant files a re-appeal. The appellant and representatives of the Basil Quality Test Lab Pvt. Ltd. Certification Division will have the right to a private hearing before the Appeal Panel. Within seven days of the panel meeting and decision, the appellant will get a written notice of the Appeal Panel's final decision, which is based on the majority of the panel as announced by its chairman. Both the appellant and the Basil Quality Test Lab Pvt. Ltd. Certification Division must abide by the Appeals Committee's conclusions. According to paragraph 7.2.6 of this appeals procedure, the appellant and Basil Quality Test Lab Pvt. Ltd. Certification Division must both take corrective action. As stated in paragraph 7.2.3 on Appeals Cost, the CEO is responsible for setting up the resources needed to organise meetings and conduct appeals investigations.

7.2.3 Appeals Committee Constitution:

A panel will be chosen by the Advisory Council chairperson to consider the appeal. A chairperson and two members make up the panel known as the Appeals Committee; none of them have any direct or personal connection to the appeal's subject matter or have participated in the audit or certification procedure that is associated with it. Within 30 days of receiving the appeal request, the Panel will convene. The appeal panel's composition, meeting time, and location must be communicated to the appellant at least 14 days in advance.

The appellant is entitled to voice concerns about the composition of the Appeal Panel. These objections must be submitted in writing to the Basil Quality Test Lab Pvt. Ltd. Certification Division at least seven days prior to the Panel meeting date. The Advisory Council will review the appellant's objections to the Appeal Panel's constitution at its next scheduled meeting, or earlier if doing so would result in a delay of more than 30 days between the appeal communication and the Panel's meeting. The Board will then determine whether or not to accept the objections and make the necessary amendments to the Panel's constitution. In cases of such reconstitution, the appellant will get written notice of the Board's decision along with a new date for the appeal hearing.

7.2.4 Appeals Cost:

Through invoicing as specified in paragraphs 7.2.2, Basil Quality Test Lab Pvt. Ltd. Certification Division, India retains the authority to charge the appellant fair charges for this second line of independent appeals settlement. The appellant may be charged before any review starts, and the levy of charges will be communicated beforehand at the time of the second line resolution. In the interim, the CEO will set up the resources required for the Appeals Committee's formation and meeting, which will be utilised to decide which charges need to be billed.

7.2.5 Liabilities:



Under no circumstances shall the Certification Division of Basil Quality Test Lab Pvt. Ltd., its employees, or its agents be held responsible for any losses, damages, charges, costs, or expenses of any kind that any approved producer, applicant, or scheme member may experience or incur as a result of the administration or performance of their respective obligations in connection with the Certification Scheme, with the exception of situations in which costs result from the wilful default or gross negligence of such individuals.

7.2.6 Corrective Action:

Depending on the results of the Appeals Committee's review, the CEO will authorise appropriate corrective action in accordance with paragraph 6.4 of this procedure where an appeal outcome is necessary.

Basil Quality Testing Lab Private Limited

CEO (Jan 13, 2026)

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