



CANADIAN COUNCIL OF INDEPENDENT LABORATORIES (CCIL)

PROCEDURE FOR HANDLING COMPLAINTS

1.0. General Policy Related to Handling Complaints

1.1. Commitment to Impartiality and Confidentiality

For all complaints, CCIL commits to handle the matter strictly in an impartial manner and to protect the identity of the complainant and the parties involved in the complaint. CCIL shall take all reasonable steps to ensure that all persons involved in investigations of complaints have no conflict of interest with any party involved in the complaint. Furthermore CCIL shall strive to protect the proprietary and confidential information of all parties during the investigation. Unless such information is already in the public domain, this includes but is not limited to all technical, financial, personal, and business information.

1.2. General

This policy details the procedure for addressing expressions of dissatisfaction or complaints related to:

- the ethical behaviour of a CCIL member,
- a CCIL certified laboratory's compliance with CCIL certification requirements, or
- the CCIL certification program.

For the purposes of this document, all reported concerns whether verbal or written, are considered "expressions of dissatisfaction" and an initial effort is made by an appropriate CCIL person to address such expressions of dissatisfaction in an efficient, informal manner. If an expression of dissatisfaction is not readily resolved, such as the result of a misunderstanding or misinterpretation, and to the satisfaction of the party who raised the concern, the matter is considered a potential complaint requiring at least a preliminary investigation to determine if a formal investigation is warranted and, if warranted, which method of investigation is most appropriate. As part of any investigation, it is highly preferable to receive evidence in writing.

In some cases, minor issues may arise due to the complainant's lack of understanding of some issue. In such cases, the matter can often be resolved with a timely discussion with the complainant. The CCIL representative receiving the expression of dissatisfaction shall forward the information to the most appropriate CCIL person to determine if the matter can be addressed in this manner. The appropriate CCIL person may be the Certification Program Manager, the Executive Director, or the National Office Manager.

If the expression of dissatisfaction cannot be addressed as described above, the matter is considered a complaint which shall be addressed in a more formal manner. Hereafter, the policy will use the term complaint in the description of the policy and its actions.

If an investigation of a complaint is to be undertaken, any laboratory that is being investigated shall be advised by CCIL in writing. At the same time the laboratory shall be advised which of the above noted investigative procedures will be followed.

1.3. Process for Investigating Complaints

All complaints shall be addressed to the attention of the Executive Director. The Executive Director shall be responsible to ensure that the investigation of the complaint takes place in accordance with the process described in this document. In particular, the Executive Director, who has no direct association with any member, with any laboratory or with CCIL Certification, shall ensure that CCIL's commitment to impartiality and confidentiality is maintained.

There are two separate procedures for investigating complaints.

If the complaint relates to the activities of CCIL as a certification body or relates to a non-compliance of a certified laboratory operating under the CCIL certification requirements, the investigation of the complaint shall be conducted in accordance with the procedures described in the subsequent sections of this document.

If the complaint does not involve laboratory certification but instead questions the ethical behaviour of a CCIL member, the matter shall be referred to the Ethics Committee, as required in the By-Laws, and the matter shall be investigated in accordance with the policies relating to principles and code of ethics.

In cases when it is not initially clear to the Executive Director which of the two above described procedures is to be used, the Executive Director shall assemble a committee to assist the Executive Director. The Executive Director shall choose the committee from members of the Board of Directors and/or from CCIL Certification personal. If necessary to comply with the commitment to impartiality and confidentiality, the identity of the complainant and the party being investigated shall be withheld from the committee. Based on that decision, the appropriate procedure described above is followed.

CCIL shall respond in writing to the complainant, acknowledging receipt of the complaint and advising what procedure will be used to investigate the complaint. If no investigation is undertaken, CCIL shall explain in writing its decision not to pursue the matter.

Any inquiries regarding this general policy and the handling of complaints can be addressed to:

Derwyn Reuber, Executive Director
Canadian Council of Independent Laboratories
PO Box 41027
Ottawa, ON
K1G 5K9
Tel: 416.233.3403
Email: dreuber@ccil.com

2.0 Complaints involving CCIL Certification and CCIL Certified Laboratories

2.1. Purpose and Scope

The purpose of this procedure is to define the steps related to complaints brought before the CCIL Certification Office by any party that seeks redress. The complaint may be related to a CCIL certified laboratory's compliance with CCIL certification requirements or related to the CCIL certification program.

This procedure describes the activities from the receipt of a verbal or written complaint to the submission of a report by the Certification Program Manager.

If the complaint involves an alleged non-compliance of a CCIL certified laboratory, this procedure is followed only if the alleged non-compliance is within the laboratory's scope of certification. As a laboratory certifier, CCIL has no authority to investigate a complaint against a laboratory outside the laboratory's scope of certification. In such circumstances, however, if the laboratory is a CCIL member and if the laboratory may have contravened CCIL's Code of Ethics, then the complaint shall be referred to the Ethics Committee for consideration.

2.2. Definitions and Abbreviations

For the purposes of this document, the following terms and definitions shall apply.

Appellant - any laboratory which is making an appeal against a decision made by CCIL relating to a complaint.

Appeal - any request by a laboratory for reconsideration of a decision made by CCIL relating to a complaint.

Complaint - an expression, preferably written, of dissatisfaction made to CCIL, relating to malpractice, competence, ethical conduct or misrepresentation by certified laboratories, certified technicians or technologists, or laboratory employees, or to the conduct of the Certification Program by CCIL, where a response or resolution is explicitly or implicitly expected.

Complainant - any party that is making a complaint.

Dispute - a disagreement with a decision made in writing, after pursuing the appeal process.

2.3. Responsibility

The implementation and maintenance of this procedure is the responsibility of the CCIL Board of Directors.

2.4. Action

2.4.1 Complaints

- 2.4.1.1** Upon receipt of a verbal complaint, the CCIL representative initially contacted shall record the details of the complaint and instruct the complainant to submit their complaint in writing to the CCIL Executive Director. As described in clause 1.3 of this document, a decision shall be made as to the procedure to be followed to investigate the complaint.
- 2.4.1.2** If the decision is made to have the complaint investigated using this procedure, the Executive Director shall forward all supplied information to the CCIL Certification Program Manager, with a copy to the CCIL Administrative Assistant. The information contained in the written submission shall be used to complete a CCIL Complaint Report Form provided as Appendix I of this document. The written complaint will be attached to the form.
- 2.4.1.3** Where the complainant chooses not to confirm a complaint in writing relating to the conduct of a laboratory or technician, whether certified or not, no further action will necessarily be taken. Where the complainant chooses not to confirm a complaint in writing that relates to CCIL procedures, the complaint will be reviewed and the Certification Program Manager will implement any improvement considered beneficial to the Certification Program.
- 2.4.1.4** The CCIL Administrative Assistant shall assign the appropriate reference number to the complaint using the Complaints/Appeals/Dispute Tracking Form provided in Appendix 2 of the document "CCIL Procedure for the Suspension, Withdrawal, Appeals and Disputes of Certification".
- 2.4.1.5** Where the complaint relates to the activities of a laboratory or a technician certified by CCIL, the complainant shall be asked if the complaint has been brought to the laboratory's attention through the laboratory's complaints handling procedure. If this has not been done, the complainant shall be encouraged to pursue that course of action first. If the complainant has tried to resolve the issue without success, the Certification Program Manager shall accept the complaint according to the terms described herein.
- 2.4.1.6** Where the complaint relates to the activities of a laboratory or person not certified by CCIL, the complainant shall be advised that CCIL will only accept a complaint that relates to a laboratory and/or technician/technologist certified by CCIL. The Certification Program Manager shall accept any reasonable complaint that relates to the conduct of the Certification Program itself.

- 2.4.1.7** The Certification Program Manager shall investigate the documented complaint through discussions or correspondence with all parties concerned and through arranging a laboratory inspection if warranted, and shall normally make a decision concerning the complaint within 30 days of receipt of the complaint.
- 2.4.1.8** On conclusion of the investigation the Certification Program Manager shall, in consultation with the Director of Certification Programs, prepare a report on the investigation, including identification of any non-conformities uncovered and an action plan for CCIL. Before the report is acted upon, it shall be reviewed and approved by the Management Committee. If the approved investigation report identifies nonconformity, the non-conforming party shall normally be required to resolve the issue within 30 days of being advised by the Certification Program Manager.
- 2.4.1.9** The Certification Program Manager shall, in writing, inform the complainant of the decision(s) made and request in writing the complainant's signed statement of acceptance using the CCIL Complaint Report Form. The Certification Program Manager shall retain and file all documents relating to the complaint at the Certification Office. The CCIL Administrative Assistant shall update records to indicate the resolution of the complaint.

2.4.2 Appeal

On receipt of notice that the laboratory in question is appealing the decision made by CCIL, the Certification Program Manager shall follow the procedures contained in Section 5.0 of the document "CCIL Procedure for the Suspension, Withdrawal, Appeals and Disputes of Certification".

2.4.3 Dispute

Where the appellant expresses non-acceptance of the ruling given by the Appeals Committee, the Certification Program Manager shall follow the procedures contained in Section 6.0 of the document "CCIL Procedure for the Suspension, Withdrawal, Appeals and Disputes of Certification".

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Appendix 1

Complaint Report Form

1. Complaint/Appeal/Dispute No: _____

2. Date received: _____

3. Recorded by (CCIL Personnel): _____

4. Complainant/Appellant (Company or Individual): _____

(a) Contact Person: _____

(b) Address: _____

(c) Telephone Number: _____

(d) Fax Number: _____

(e) E-mail: _____

5. Complaints Against Certified Laboratory or Technician: _____

(a) Laboratory/technician Name: _____

(b) Laboratory/technician Address: _____

(c) Laboratory Contact: (if known) _____

6. Clear description of Complaint/Appeal/Dispute: _____

Complainant's Name: _____ Complainant's Signature: _____

7. Complaints Against CCIL:

(a) CCIL Interpretation of Requirements: _____

(b) Outgoing CCIL document: _____

(c) Management system documentation: _____

(d) Personnel behavior: _____

(e) CCIL Delivery time: _____

(f) Other (Specify) _____

8. Correction:

(a). Complainant Accept Complainant's Name: _____ Date: _____

Complainant Reject Complainant's Signature: _____

(b). **To be completed on official instruction from CCIL CO only**

I hereby agree to comply with the decision(s) given to me by CCIL CO on the (date) as a settlement of the complaint/appeal/dispute stated above.

Name: _____ Signed in the presence of: _____
(CCIL CO Representative)

Date: _____

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9a. Decisions) made on any deficiency identify from the complaint; appeal, dispute or other:

9b. Date of settlement and reference document(s):

10. Corrective Action and Schedule for Implementation:

11. Results of Corrective Action:

12. Effectiveness of Corrective Action:

13. Certification Program Manager Comments:'

14. Certification Program Manager's Name:

Date:

Signature: