

Complaints about Certification Body Activities - Procedure

Document Reference	PRC/CER/130	Version	3.0
Owner	Management	Status	Approved
Applicable Standard	ISO/IEC 17065:2012	Scheme	All
Review Frequency	Annual or on change	Effective Date	26/05/2026

1. Introduction

1.1 This procedure is to be followed when handling complaints in relation to the activities of the NAPIT Group of companies.

1.2 This procedure aligns with the Complaints against NAPIT Activities Policy and defines a structured, staged approach to complaint handling in accordance with ISO/IEC 17065 requirements for impartiality, consistency and transparency.

1.4 Staff can access the relevant procedure and complaint related files here: [Complaints About Certification Body Activities](#).

1.5 All public facing guidance can be located here: [NAPIT Complaints](#)

3.8 Where the matter concerns a decision affecting certification, the Appeals Procedure (PRC/CER/131) will be followed.

2. Receipt, Recording and Initial Contact

2.1 A complaint about the Certification Body and its activities from a complainant may be initially received by any member of staff in a variety of formats.

2.2 In line with NAPIT policy, staff should seek to resolve complaints informally at the first point of contact where possible.

2.3 Verbal complaints which require escalation beyond the initial handler to a member of the management team, where possible, should be requested in writing for traceability and formality.

2.4 Where a complaint cannot be resolved informally, the complainant shall be requested to submit a formal complaint in writing via email or the [Complaint About NAPIT Activities form \(COM/FOR/0020\)](#).

2.5 Lack of written submission should not act as a barrier to progression where sufficient information is available to investigate the complaint.

2.6 Any refusal of a request to submit a written complaint must also not present a barrier and where a vulnerable party is involved, reasonable adjustments may be required to assist in the communication process. Please see the [NAPIT Reasonable Adjustments Policy](#).

2.7 Any information taken verbally should be documented within the complainant's customer record if applicable to Training and/or Certification otherwise it can be held in the [Complaints v NAPIT Case Files](#)

2.8 All written complaints should be passed to the relevant Departmental Manager(s) or an appointed deputy in the first instance and acknowledged within 5 working days by them.

2.9 All complaints at this stage are classified as Stage 1 – Departmental Investigation.

2.10 The Manager(s) must record all necessary details after assigning the next complaint reference number (Nyy-xx) on the [Complaints v NAPIT Log \(NGL/REP/0030\)](#), and a note added to the NWC Database (if applicable) confirming complaint reference number and which Department Manager is responsible for the complaint investigation as this may be more than one if multiple areas of business are included in the complaint.

2.11 Where the complaint is resolved by the Department Manager on initial contact (verbal or written), an email will be sent to the complainant to confirm the resolution and case closure, following this the necessary closure details must be recorded by the Manager on the Complaints v NAPIT Log (NGL/REP/0030).

3. Internal Investigation (Stage 1 – Departmental Investigation)

3.1 Where the complaint cannot be resolved upon initial contact, the Department Manager shall carry out an initial investigation to determine whether the complaint is upheld, partially upheld or rejected.

3.2 The investigative approach takes account of the need to balance a timely response and a thorough review of the complaint. The investigation as necessary may involve the review of:

- Email/letter communications
- Call recordings
- NAPIT documents and procedures
- Statements from staff involved
- Complainant evidence
- Customer file notes

3.3 The outcome of the investigation approach, shall determine whether the complaint is upheld, partially upheld or rejected.

3.4 A full written response should be issued within 10 working days where possible. Where additional time is required, the complainant shall be informed of revised timescales and progress updates. The complainant response must include as a minimum:

- Summary of original complaint
- Summary of investigation findings
- Outcome of the investigation (upheld, partially upheld or rejected)
- Next Steps:
 - For upheld or partially upheld, include any actions required of the complainant and or NAPIT to bring about closure.
 - For rejected complaints, include the reason and a closure statement.

3.5 Where the complaint investigation and final response involves any of the above sources of information, copies of these along with the final response should be saved to the Complaints v NAPIT Case Files, in the relevant year sub-folder and titled with the same name as the complaint reference.

Example: Sub-folder: 2024 > Sub-folder: Nyy-xx > Case Investigation evidence and final response.

3.6 If the review raises any nonconformity with any of the standards or scheme requirements that the Certification Body should have met, these should be communicated to the Standards Team by the Department Manager to be recorded on the CAPA Register (NGL/QMS/0020), where appropriate corrective and preventive actions should be identified and undertaken.

3.7 Following the final response, if the complainant remains unsatisfied, they shall be informed of their right to escalate the complaint to Stage 2 – Senior Management Review.

3.8 If escalation is requested, the Department Manager/Head should pass the details of the verbal/written complaint and/or completed Complaint About NAPIT Activities form (COM/FOR/0020) over to the Senior Management reviewer and confirm the case reference number so that the supporting information and evidence can be located in the relevant sub-folder.

4. Review by a Senior Manager / Independent Party (Stage 2 – Senior Management Review)

4.1 Stage 2 reviews shall be conducted by a member of the Senior Management Team independent of the original investigation.

4.2 The Senior Management reviewer appointed may be a Head of Department or a Director who must, ensure that they have had no involvement with the complainant that would compromise impartiality. Where the appointed Senior Management reviewer is not sufficiently independent from the complainant, the review may be allocated to an alternative member of the Senior Management Team, or a member of the Standards Team should this be necessary to manage impartiality and or the escalation route for the complaint. Appointment to the Standards Team should be approved by the Head of Compliance or Director.

4.3 The appointed Reviewer confirms receipt of the request to escalate to stage 2 of the complaint within 5 working days. If not already completed, the use of the Complaint About NAPIT Activities form (COM/FOR/0020) may be requested to clarify the scope of the complaint, however this shall not be mandatory where sufficient information has already been provided.

4.4 A full review of the stage 1 investigation, stage 1 NAPIT response and the complainants' grounds for escalation will be completed. The review shall determine whether the stage 1 outcome remains upheld, partially upheld or rejected.

4.5 A full written response should be issued within 10 working days where possible. Where additional time is required, the complainant shall be informed of revised timescales and progress updates. The complainant response must include as a minimum:

- Summary of grounds for escalating the complaint
- Summary of review findings
- Outcome of the review (upheld, partially upheld or rejected)
- Next Steps:
 - If the review has rejected or partially upheld the original outcome, include any actions required of the complainant and or NAPIT to bring about closure.
 - If the review upholds the original outcome, include the reason and a closure statement.

4.6 If the review raises any nonconformity with any of the standards or scheme requirements that the Certification Body should have met, these should be communicated to the Standards Team by the Reviewer to be recorded on the CAPA Register (NGL/QMS/0020), where appropriate corrective and preventive actions should be identified and undertaken.

4.7 Any further documentation and the stage 2 response should be saved to the Complaints v NAPIT Case Files and outcome logged on the Complaints v NAPIT Log (NGL/REP/0030).

4.8 Whilst escalation to a Director is not required the Reviewer may consider further internal review with the appropriate NAPIT Director to decide on a course of action.

4.9 In all cases where the complainant advises they are taking legal action NAPIT Directors should be informed.

4.10 Where the complainant remains unsatisfied following Stage 2, the internal complaints process shall be considered exhausted, and the complainant shall be informed of their right to escalate to Stage 3 – External Body.

5. Escalation to External Body (Stage 3 – External Escalation)

5.1 Where the complainant has exhausted stages 1-2 of this process and a further internal review is not required and/or possible, the complainant is advised to consider contacting the relevant external body.

5.2 The relevant external body will be identified based on the nature and scope of the complaint. These may include but are not limited to:

- UKAS (Accreditation Body)
- MCS (Scheme Owner)
- TrustMark (Scheme Owner)
- BAFE (Scheme Owner)
- BSR (Scheme Owner)

5.3 In circumstances where the complainant has contacted an external body following advice from NAPIT, full co-operation is expected in assisting their investigation.

5.4 The outcome of the external body's investigation is logged on the Complaints against NAPIT Log (NGL/REP/0030) and the Certification Body complete any actions as required.

5.5 If the findings of the investigation indicate any nonconformity with any of the standards or scheme requirements that should have been met, the case is recorded on the CAPA Register (NGL/QMS/0020), where appropriate corrective and preventive actions are identified and undertaken.

6. KPI and Monitoring

6.1 NAPIT will monitor and record monthly KPI in relation to Complaints against NAPIT activities.

6.2 NAPIT will conduct ad-hoc reviews of complaint outcomes to identify common issues and areas for procedural improvement and or staff training.