

	<h2>Procedure for Complaints and Appeals</h2>	<b>Document No:</b>	EPR 012
		<b>Release Date:</b>	22-03-2017
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### 1. PURPOSE

The purpose of this procedure is to explain how natural or legal persons make complaints regarding any matter and appeals related to accreditation decision and the methods NAC adopts for handling and resolving complaints and appeals.

### 2. SCOPE

This procedure covers NAC's accreditation activities, evaluation and decision processes, and handling and resolving processes of complaints and appeals related to accreditation processes of bodies accredited or to be accredited by NAC or any matter in this respect.

### 3. DEFINITIONS

Definitions related to this procedure are given in the TL 001 Instructions on Terms and Definitions Used in NAC Documentation.

### 4. RELATED DOCUMENTS

FR 013 Complaint/Appeal Record Form

FR 014 Confidentiality and Impartiality Commitment of Committee/Board/Working Group Members

PR 017 Procedure for the Accreditation of Conformity Assessment Bodies

FR 038 Assessment Team Proposal Form

### 5. IMPLEMENTATION


It is essential that all kinds of complaints and objections within the scope of this procedure are handled by NAC within the framework of objective evidence and in a way that does not make any distinction due to the qualifications of real and legal persons and CABs, within the scope of situations that may cause a conflict of interest in terms of impartiality, the measures to be taken to prevent these from occurring, and possible sanctions.

#### 5.1 Complaints

Complaints about NAC's activities may generally be related to:

- Handling of applications
- Conduction of assessments
- Elapsed time for gaining accreditation
- Inappropriate performance, attitude and behavior of the assessment team during the assessment, noticed by the applicant or accredited body
- Insufficient service performance of NAC personnel, noticed by the applicant or accredited body
- Partial or complete rejection by NAC of an accreditation application
- Assessment proposal made by NAC
- Findings and corrective action requests of the assessment team as a result of the accreditation assessment carried out on behalf of NAC, etc.

In addition, there may be complaints about the activities of accredited bodies regarding the scope of their accreditation and services they provide. Accredited bodies, users of accredited services or third parties may make complaints. It is essential to send complaints in writing to NAC by mail/fax or e-mail. Verbal complaints shall also be put in writing by complainants. As a minimum, complaints shall include first and last name and contact information of the complainant and a clear statement of the complaint. When necessary, NAC may investigate the complainant's identity for verification purposes. Where the complaint is received without name and contact information, or without being able to verify the person's identity, the complaint is not processed within the scope of this procedure; however, it may be reviewed depending on its content. All complaints received by the body shall first be recorded in the information system by the case officer and submitted to the Quality Manager. Complaints about the Quality Manager shall be submitted to the Complaints and Appeals Evaluation Committee. The Complaints and Appeals Evaluation Committee shall evaluate the validity of the complaint. If the complaint is not valid, it shall be rejected and the Complaints and Appeals Evaluation Committee shall notify the complainant of the reason for the rejection. If the complaint is valid, the Committee shall transfer it to the Quality Manager, and the Quality Manager shall send the complaint to the relevant department. The relevant department supervisor shall assign the department personnel s/he deems appropriate according to the subject of the complaint to examine it. After the determination of the relevant personnel, the Complaints and Appeals Evaluation Committee shall be informed by e-mail of the first and last name and contact information of the person who will handle the complaint. The Committee shall notify the complainant of the aforementioned information within seven (7) days. The person handling the complaint shall first evaluate whether the complaint has been supported by sufficient information/document. If the complaint has not been supported with sufficient information/document(s), FR 013 Complaint/Appeal Record Form shall be prepared indicating that the complaint could not be processed due to the lack of information/document, then FR 013 Complaint/Appeal Record Form shall be submitted for the approval of the

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Complaints and Appeals Evaluation Committee after obtaining the confirmation of the relevant department manager and the Quality Manager. The final FR 013 Complaint/Appeal Record Form shall be sent to the complainant by the relevant personnel and the complaint shall be finalized. If the complaint has been supported with sufficient information/documents, the process shall be progressed as specified in Clauses 5.1.1- 5.1.4.


In the processes of handling and evaluating a complaint, attention shall be paid to not include persons related to the subject of the complaint. Any personnel of the Body may be assigned by the Quality Manager and the Chair of the Complaints and Appeals Evaluation Committee, without being referred to the relevant department manager, to carry out the operations related to the complaint when necessary.

#### 5.1.1 Evaluation and Resolution of Complaints about CAB's Activities within the Scope of Accreditation

Complaints about CABs should first be made to the body directly related to the complaint. If the complaint cannot be resolved with this method, it may be submitted to NAC. However, when it is not deemed appropriate to inform CAB of the complaint and the complaint is about CAB's deliberate violation of accreditation rules, the complaint can be submitted directly to NAC. It is essential that there are valid documents regarding the activity subject to the complaint and that these documents are related to an activity within the scope of CAB's accreditation/accreditation application. If the information provided cannot be verified, no action shall be taken. In cases where CAB does not resolve the complaints regarding the general practices of CAB or the issues causing general dissatisfaction with the activities of parties to which it provides service, or when NAC deems necessary, CAB shall be asked to implement its own complaint evaluation procedure and report the results to NAC. CAB shall notify NAC as soon as possible about all activities (re-evaluation, corrective actions, internal audit and management review, etc.) it has undertaken with regard to the complaint. In cases where the complaint is not resolved with the implementation of CAB's complaint evaluation procedure, there is doubt about the adequacy of the measures taken by the body or it is deemed necessary to examine the compliance of the body with NAC's accreditation criteria, NAC may perform an extraordinary assessment. If the subject of the complaint is related to critical issues regarding impartiality or CAB's incompetency, after making the necessary verifications within the framework of confidentiality rules, NAC may perform an extraordinary on-site assessment in order to verify the evidence submitted, without informing CAB about the subject and content of the complaint. In this case, CAB shall be obliged to provide all kinds of means to NAC to carry out the assessment safely. As a result of these assessments, if the complaint or notification about CAB is confirmed, the costs of the assessment shall be invoiced to CAB. If there is no non-conformity found during the assessment, the assessment proposal fee shall not be invoiced to CAB. If deemed necessary, as a result of the evaluation made by the Quality Manager and the Chair of the Complaints and Appeals Evaluation Committee, a person/working group not involved in the complaint processes may be assigned to conduct a detailed investigation on the complaint. Received complaints shall be recorded in FR 013 Complaint/Appeal Record Form. If person(s) to be assigned has/have not signed a contract with NAC which includes confidentiality and impartiality provisions, the said person(s) shall sign FR 014 Confidentiality and Impartiality Commitment of Committee/Board/Working Group Members. In addition, person(s) to be assigned shall give a written confirmation stating that they do not have any relation that may affect their impartiality regarding the subject. After the commitments have been received, the documents to be examined regarding the complaint and the necessary information shall be sent to the assigned person(s) by e-mail or the documentation of the relevant CAB shall be made available to the assigned person(s). Members shall be asked to submit their evaluation of the complaint within twenty-one (21) days. Validity of the complaint shall be evaluated by the person(s) who will make a detailed evaluation of the complaint, all kinds of activities related to the complaint shall be reviewed and the reasons for the complaint be investigated. The evaluations of the assigned person(s) regarding the complaint shall be reviewed by the relevant department supervisor, Deputy General Secretary, Quality Manager and Complaints and Appeals Evaluation Committee, and the evaluation made regarding the complaint shall be recorded. The abovementioned assessments shall be finalized according to their type in accordance with PR 017 Procedure for the Accreditation of Conformity Assessment Bodies. Following the completion of the processes above, the complaint process shall be finalized in accordance with Clause 5.1.4.

#### 5.1.2 Evaluation and Resolution of Complaints about NAC's Activities

Complaints received shall be recorded in FR 013 Complaint Record Form. If the complaints are about NAC's policies, implementations (including rejection of accreditation application, assessment findings and corrective action requests etc.), personnel (including assessors/technical experts), processes or procedures in general, it shall first be determined whether the complaint has arisen from misunderstanding. If it has arisen from misunderstanding, it shall primarily be resolved, and information about the process shall be reported to the department supervisor, Quality Manager and relevant Deputy General Secretary. The Complaints and Appeals Evaluation Committee shall communicate the said information to the Quality Manager. The Quality Manager shall communicate the result of the submitted complaint to the complainant and the complaint shall be finalized. If necessary, as a result of the evaluation made by the Quality Manager and the Complaints and Appeals Evaluation Committee, a person/working group not involved in the processes of the complaint may be appointed to carry out a detailed investigation. If person(s) to be assigned has/have not signed a contract with NAC which includes confidentiality and impartiality provisions, the said person(s) shall sign FR 014 Confidentiality and Impartiality Commitment of Committee/Board/Working Group Members. In addition, person(s) to be assigned shall give a written confirmation which states they do not have any relations that may affect their impartiality regarding the subject. After the commitments have been received, the documents to be examined regarding the complaint and the necessary information shall be sent to the assigned person(s) by e-mail or the documentation of the relevant CAB is made available to the assigned person(s). The relevant persons shall be asked to submit their evaluation of the complaint within twenty-one (21) days. The person(s) assigned for the complaint shall investigate the issues causing the complaint and determine possible corrections or corrective actions. Where a nonconformity is detected as a result of the cause analysis, corrective actions are carried out in accordance with PR 008 Procedure for Control of Nonconformities and Corrective Actions. When necessary, unplanned internal audits may be performed in accordance with PR 009 Procedure for Internal Audit. If necessary, relevant departments shall

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cooperate.

Following the completion of the above-mentioned processes, the process regarding the complaint shall be finalized in accordance with Section 5.1.4.

#### 5.1.3 Applications for Assessment Proposals, Assessment Plan or Assessment Team

Taking into account the assessment date, the Quality Manager shall evaluate the application for the complaint submitted to NAC with reasons regarding the assessment proposal, assessment plan or assessment team, within a reasonable time. Complaints received shall be recorded in FR 013 Complaint/Appeal Record Form. It shall first be determined whether the complaint has arisen from misunderstanding. If the complaint has arisen from misunderstanding, lack of information or error of fact, it shall primarily be resolved by the Quality Manager. In accordance with the agreement reached, the application shall be finalized by updating the assessment proposal/plan, if necessary. Such applications resulting in such agreement shall not be evaluated as complaints. In cases where such agreement cannot be reached with CAB, the application shall be recorded in the complaint/appeal tracking system as a complaint and the relevant steps mentioned above (Clauses 5.1.1, 5.1.2) shall be applied and the complaint shall be finalized.

CAB may not accept the assessment team fully or partially. CAB shall specify this issue with FR 038 Assessment Team Proposal Form. NAC case officer shall evaluate this request and respond to CAB, then informs the Complaints and Appeals Committee of the situation.

#### 5.1.4 Notification of the Outcome of a Complaint

According to NAC's policy, when possible, it is essential that complaints are resolved within thirty (30) days after they have been submitted in writing to NAC. Complaints received shall be recorded in FR 013 Complaint/Appeal Record Form. Complaints requiring information/document from persons or bodies other than NAC shall be concluded within thirty (30) days after the said information/document has been obtained, and complaints requiring assessment shall be finalized within thirty (30) days after the completion of the assessment process. Actions taken related to the complaint shall be monitored step by step in terms of their full compliance with NAC procedures; whether the decision taken reflects NAC policies shall be evaluated by the Quality Manager, and the information shall be recorded in the complaint/appeal tracking system at each stage. Personnel assigned to follow up the complaint process shall submit a report of actions carried out to the Quality Manager depending on the time taken to finalize the complaint and importance of the subject. After the Quality Manager and Complaints and Appeals Evaluation Committee review the report, the relevant personnel shall send the final FR 013 Complaint/Appeal Record Form which has been approved by the relevant Deputy General Secretary to the complainant and, when necessary, other relevant parties by e-mail (depending on the request of the complainant) in accordance with confidentiality rules, and the complaint shall be finalized.

The Quality Manager shall notify the Complaints and Appeals Evaluation Committee of the finalization of the complaint. In cases where a complaint is not resolved, the process in Clause 5.3 shall be carried out.

#### 5.2 Evaluation and Resolution of Appeals

Appeals can be made against the accreditation decisions specified in Clause 5.1.


Applications for appeal shall be made in writing within thirty (30) days from the notification date of the accreditation decision.

The application for appeal shall be made with FR 013 Complaint/Appeal Record Form with objective evidence attached.

The application for appeal shall contain the following information:

- Date and number of the decision made regarding the appeal (if any),
- Reasons or grounds for the appeal,
- Name of the body and person making the application,
- Contact information of the relevant person.

The Case Officer shall first record all appeals made to the body in the information system and submit the records to the Quality Manager. The Quality Manager shall inform the relevant Deputy General Secretary. The relevant Deputy General Secretary and Quality Manager shall assign person(s) they deem appropriate to follow up the appeal process. After the determination of the relevant personnel, the Complaints and Appeals Evaluation Committee shall notify the appellant by e-mail or FR 013 Complaint/Appeal Record Form of the first and last name and contact information of the person who will handle the appeal. This notification shall be made within seven (7) days of receipt of the application. If necessary, as a result of the evaluation made by the Quality Manager and Complaints and Appeals Evaluation Committee, a person(s) independent of the appeal processes may be assigned to conduct a detailed investigation on the appeal. If person(s) to be assigned has/have not signed a contract with NAC which includes confidentiality and impartiality provisions, the said person(s) shall sign FR 014 Confidentiality and Impartiality Commitment of Committee/Board/Working Group Members. In addition, person(s) to be assigned shall give a written confirmation stating that they do not have any relation that may affect their impartiality regarding the subject. After the commitments have been received, the documents to be examined regarding the appeal and the necessary information shall be sent to the assigned person(s) by e-mail and the person(s) shall be asked to submit their evaluations regarding the appeal immediately, taking into account the maximum time required to finalize the appeal. The person(s) assigned to evaluate the appeal shall evaluate its validity, review all activities related to the subject of the appeal and investigate the reasons for the appeal. The relevant Deputy General Secretary and

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Quality Manager shall evaluate the opinions of the assigned person(s), and the final evaluation regarding the appeal shall be recorded with meeting minutes. The Quality Manager shall notify the appellant of the final decision regarding the appeal in accordance with the confidentiality rules, with FR 013 Complaint/Appeal Record Form prepared by the person(s) assigned for the appeal, with the confirmation of the Quality Manager and the approval of the relevant Deputy General Secretary. The Quality Manager notifies the Complaints and Appeals Evaluation Committee of the finalization of the appeal. However, person(s) who has/have made the decision regarding the appeal shall not take part in the final decision phase of the said appeal. Operations carried out related to the appeal are recorded in the complaint/appeal tracking system at each stage.

Appeals shall be resolved within thirty (30) days from the date of application. Appeals requiring information/document from persons or bodies other than NAC shall be concluded within fifteen (15) days after the said information/document is obtained, and appeals requiring assessment shall be finalized within fifteen (15) days after the completion of the assessment process. In cases where an appeal is not resolved, the process in Section 5.3 is carried out.

### 5.3 Continuation of Complaint/Appeal and Complaint and Appeal Evaluation Committee

In cases where the complaint/appeal continues or the resolution of the complaint /appeal requires a legal evaluation, the relevant Deputy General Secretary shall inform the General Secretary, and the Complaints and Appeals Evaluation Committee shall be informed of the situation. In addition, when it is deemed necessary, a legal process shall be initiated by the Legal Department.

The opinion of the Complaints and Appeals Evaluation Committee, all comments regarding the complaint/appeal, analyses, evaluations, suggested corrective actions and other relevant information shall be submitted to the relevant Deputy General Secretary. The relevant Deputy General Secretary shall communicate the situation to the General Secretary. A Committee consisting of the General Secretary and Deputy General Secretary shall make a decision. However, person(s) who has/have made the decision regarding the appeal shall not take part in the final decision phase of the said appeal.

The Quality Manager shall notify the appellant and, when necessary, other relevant parties of the decision regarding the complaint/appeal in accordance with confidentiality rules. The Quality Manager shall notify the Complaints and Appeals Evaluation Committee of the finalization of the appeal. The Complaints and Appeals Evaluation Committee consist of three members. These are:

- The Chair (one representative from university)
- One representative from an International Non-Governmental Organization
- NAC Legal Advisor

Legal Advisor is a natural member of the Committee. The term of office of other Committee members shall be 5 years. Members whose duty has ended can be reassigned for two more terms at most.

The Legal Advisor takes the Committee meeting minutes. If deemed necessary by the Committee, an expert opinion may be taken. NAC Legal Advisor does not participate in the voting.

#### 5.3.1 Committee Activities

The Committee shall objectively examine the detailed and logical grounds of the complaints and appeals and the report on the operations carried out by the Quality Manager, and if it deems necessary, receive the reports of the experts assigned to resolve technical matters. In the light of all this information, the Committee shall make a decision in such a manner that ensures impartiality, independency and integrity. The Committee can handle more than one issue in a meeting. The Legal Advisor shall present the decisions taken to the relevant Deputy General Secretary.


#### 5.3.2 Meeting and Quorum

All Committee members shall be present in order to hold the meeting. Otherwise, no meeting shall be held. During the meeting, the Committee shall state the opinion of each member for the decisions taken and these opinions shall be put in writing as an annex to the decision. Decisions shall be taken unanimously.

Apart from the Legal Advisor, the members of the Complaints and Appeals Evaluation Committee shall be paid the same daily amount paid to the NAC Experts for their services.

#### 5.4 Confidentiality and Impartiality

NAC Management shall take all necessary measures to ensure the confidentiality of information obtained regarding the examination of complaints or appeals. Legal requests made by those who make a claim or accusation with reference to a complaint regarding disclosure or confidentiality shall be taken into account. Persons appointed from outside NAC for resolving complaints and appeals and members of the Complaints and Appeals Evaluation Committee shall sign FR 014 Confidentiality and Impartiality Commitment of Committee/Board/Working Group Members with respect to impartiality and confidentiality on the date of their appointment. NAC shall take measures related to confidentiality for correspondences with a person or a third party regarding complaints and appeals; when necessary, correspondence shall be made in accordance with the rules of classified correspondence.

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If a member has a conflict of interest with a body subject to complaint/appeal, s/he shall not attend the relevant meeting by stating the reason. In this case, the decision shall be taken unanimously by the other members attending the meeting. Where unanimity could not be achieved, the vote of the Chair or, if the Chair is not present in the meeting, Vice-Chair, shall count as two votes. In this case, the decision shall be taken unanimously.

### 5.5 Keeping Statistical Records

The Complaints and Appeals Evaluation Committee shall carry out the necessary work to record all complaints and appeals, monitor responses, and create statistical data on the issue. Persons in charge of investigating the complaint shall record all the information regarding the complaint in the information MR system at every stage. Statistical information regarding complaints and appeals shall be evaluated by the Quality Manager before each MR, and the results shall be added to the performance report and put on the MR agenda.

## 6. AUTHORITY AND RESPONSIBILITIES

Authority and responsibilities are described in K 040 Guidelines on Job Descriptions and Organization Chart.

Date	Section(s)	Amendments
30.03.2022	In all sections	"FR 013 Complaint Record Form" changed to "FR 013 Complaint/Appeal Record Form"
01.08.2022	5.1, 5.1.1, 5.1.3, 5.1.4, 5.2	The word "letter" used for handling and finalization of complaints/appeals changed with "FR 013 Complaint/Appeal Record Form".