

Q25 – Feedback within CALA Programs
Revision 3.5 – June 2011



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FEEDBACK WITHIN CALA PROGRAMS

1.0 THE POLICY

1.1 Objectives

The following CALA quality objectives govern the implementation of this policy:

- CALA will establish and maintain a formally recognised quality system that supports the attainment of the CALA Mission, supports CALA operations, and meets international guidelines and best practices;
- CALA will deliver cost-effective, internationally recognised laboratory accreditation services;
- CALA will deliver cost-effective, internationally recognised proficiency testing services; and,
- CALA will deliver cost-effective and reputable training to meet identified member needs, and in support of other CALA programs.

1.2 Principles

1.2.1 Universal Application

CALA encourages individual and broad input concerning improvements to its programs. All CALA programs acquire and track member feedback in support of program measurement metrics. This feedback is normally reported to the Board of Directors during the annual Management Review.

CALA logs all feedback it receives. This includes feedback that expresses either satisfaction / dissatisfaction, or requests CALA to reconsider a decision that the association has rendered on any subject of concern to the originator of the feedback.

In rendering decisions resulting from feedback received, the primary aim of the decision taken will be the maintenance of the integrity and credibility of CALA programs.

1.2.2 Responsiveness

CALA will respond to all feedback in a timely manner.

1.2.3 Transparency and Systematic Approach

CALA deals with disputes, complaints and appeals in congruent but separate approaches, each appropriate to the feedback that has been received. These approaches are described below and, while open to scrutiny, follow well-established procedures in arriving at an appropriate decision.

Records of extraordinary feedback, such as disputes, complaints, and appeals are maintained in the logs established for the purpose. Program Managers can access them for the purposes

of facilitating the decisions on all of these types of feedback by the appropriate level of authority within the association.

1.2.4 Based on Internationally Recognised Approaches

CALA will use the approaches described in internationally recognised documentation to receive, track and treat feedback.

1.2.5 Confidentiality

CALA will treat and maintain as confidential, all information received in the form of a compliment, dispute, complaint or appeal.

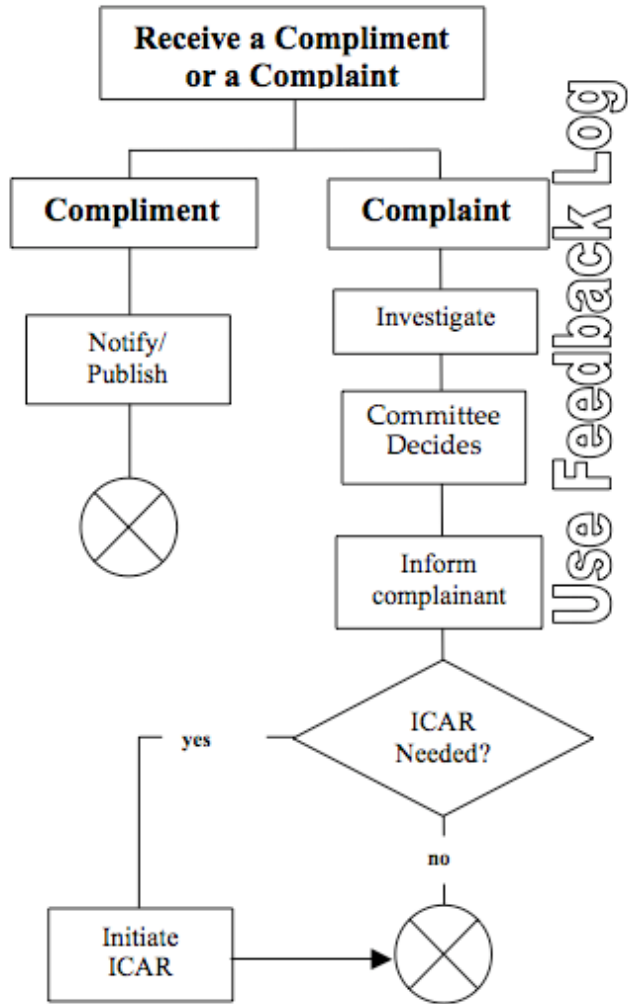
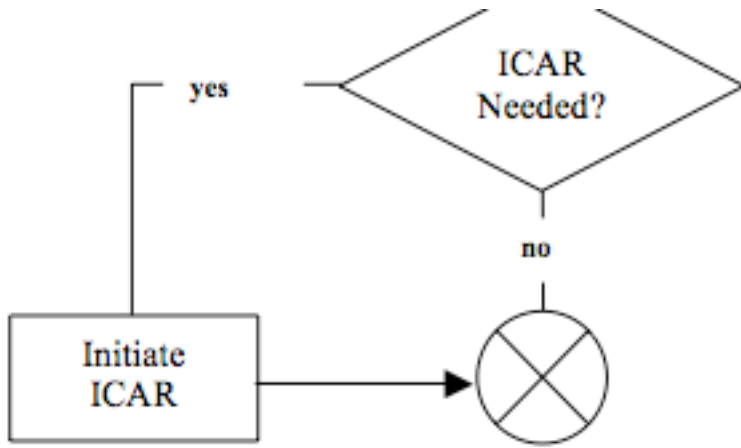
1.3 Definitions

1.3.1 Compliment

Any written expression of satisfaction or congratulations concerning any aspect of CALA.

1.3.2 Complaint (*from ISO/IEC 17011, clause 2.5.5*)

Any written expression of dissatisfaction concerning any aspect of CALA. Note that complaints received over the phone shall be recorded by the staff member in order for it to be documented and tracked.



2.2 Start Points

Program Feedback: CALA receives written feedback within all CALA programs. Besides the Membership Survey issued annually, the following feedback mechanisms are used within programs:

- Accreditation Program. Assessed laboratories submit Site Visit Evaluation forms to CALA following site visits. This feedback mechanism is tracked and the resulting information used within the accreditation program. The process is documented in A05 - *Assessor Plan*;
- Proficiency Testing Program. Program participant laboratories submit feedback to CALA following each study. This feedback mechanism is tracked and the resulting information used within the Proficiency Testing program. The process is documented in PT15 - *CALA PT Program Procedures*;
- Training Service. Training participants provide feedback to CALA following at the end of each training session. This feedback mechanism is tracked and the resulting information used within the Training Service. The process is documented in T01 - *CALA Training Service Procedures*;
- Other Surveys. CALA periodically issues membership satisfaction surveys, training needs surveys and other instruments to acquire feedback on the operation of CALA programs. These ad-hoc mechanisms acquire information that is tracked and acted upon by CALA. Records of their implementation and use are contained in management meeting minutes, management review minutes and other similar records. There are no formal procedures for these survey mechanisms, but they all follow similar approaches to acquire information, analyse it and act upon the results of the analysis; and,
- Other Formal Feedback Mechanism. All other feedback to CALA follows the procedures contained in this procedure and is acquired, tracked and acted upon accordingly.

Compliment: CALA receives a written compliment about a condition or the conduct of an organisation such as CALA itself, a laboratory accredited under CALA program, a laboratory recognised through the CALA proficiency testing program, or a partner organisation. Compliments are acquired and tracked in the CALA Feedback Log. Compliments are forwarded to the recipient's manager or the President & CEO (hereinafter referred to in this document as the CEO) and the information in it will be kept confidential to safeguard the identity of the recipient and the originator.

Complaint: Complaints received by CALA are an indication that a problem may exist which has been perceived only from the outside. The actual problem may not be the one noted in the complaint, but acceptance of an outsider's perception of a problem goes a long way to finding good and enduring solutions.

In general, complaints include written communication expressing dissatisfaction with a CALA service, policy, procedure, conduct, or some similar aspect of the operation of a laboratory that participates in one of the CALA programs.

Complaints can arrive with or without documentation to substantiate the facts of the complaint, such as a written non-conformance, or other documented abuse or breach of conduct. Staff should try to immediately resolve complaints from all sources to the satisfaction of the complainant if possible.

2.3 Action upon Receipt

CALA staff receiving a complaint are encouraged to resolve it to the satisfaction of the complainant immediately if possible. A record of actions taken shall be forwarded to the Quality Coordinator for entry into the Feedback Log.

If it is impossible to resolve the complaint immediately (within three working days), or if it is necessary to refer it to another staff member for resolution, the staff member who received the complaint should report it to the Quality Coordinator. Section 1 of F03 - Feedback Form is completed and the form is passed to the Training Assistant.

Significant complaints are those that are deemed to adversely affect the public image of CALA or call into question, the integrity or credibility of any CALA program. In the event of a significant complaint, appeal, or dispute:

- Staff shall immediately report them to the CEO, whether or not they are able to solve the complaint immediately.
- The CEO will promptly inform the President and directors.
- If the CEO is absent for a period of more than three days, they shall be referred to the President, and in the absence of the President, the Vice President. This shall normally be done by the Manager who has been designated responsibility for the office during the absence of the CEO.

For compliments and complaints, the Quality Coordinator will complete the initial entry in the Feedback Log, ensure that the top portion of F03 - Feedback Form has been correctly completed.

In the event that a complaint refers to another organisation, a partner or involves a partner organisation, that organisation will be forwarded a copy of the complaint, as appropriate, for their action or information.

The Feedback Log will include the date of the complaint, the complainant, the issue, the employee assigned to investigate/resolve/follow up, and a summary of the resolution.

2.4 Formal Recognition of Compliments

Where this is appropriate the CEO is made aware of the circumstances involving CALA's receipt of a compliment regarding CALA., over and above the logging procedures cited above.

The Quality Coordinator normally informs the CEO of any compliments that are logged in the Feedback Log.

If it is considered appropriate by the originator and the recipient and the CEO, formal recognition of complimented behaviour may be publicised to staff, board members, committee members, assessors, member laboratories, partners, or other stakeholders.

2.5 Investigation and Adjudication

2.5.1 Initiating an Investigation of a Complaint

The Quality Coordinator passes a copy of F03 – *Feedback Form* to the Manager of the CALA program affected by the complaint for investigation and development of potential solutions.

Acceptable alternates for this activity include the Quality Coordinator and the CEO, or a member of the Board of Directors, depending on the sensitivity of the complaint or appeal. Normally disputes will be investigated and adjudicated within program staff and one of the CALA committees.

The Quality Coordinator maintains the Feedback log. This log and the documented feedback, compliments, and complaints form part of the information to be reviewed during the annual Quality System Review in accordance with Q16 – Quality System Review. The formats of the two forms are shown at the end of this procedure.

The investigator notes the suggested courses of action on F03 - Feedback Form and submits the form, with Section 2 completed, to the Quality Coordinator.

In order to simplify the considerations that encompass investigation, the investigator is provided with three questions on F03 - Feedback Form:

- Has the complaint been substantiated?
- Is the credibility of the applicable CALA program affected?
- Would the root cause/condition result in an A action?
- Any yes answers to these questions require some action from CALA

2.5.2 General Conduct of an Investigation

Investigations of complaints are conducted with only **ONE** purpose in mind; do the facts substantiate the complaint?

If the investigation of the facts substantiates the complaint, the investigator shall develop potential solutions to resolve the complaint that are within CALA's mandate. An ICAR shall be

raised to address the non-conforming condition that has been substantiated by the complaint. See Q24 - *Continuous Improvement*.

If the facts identify any weakness, shortcoming or non-conformance of the CALA QMS, an ICAR is to be raised to address it. See Q24 - *Continuous Improvement*.

While investigating a complaint, it is important to understand that all other CALA actions that may result from a complaint do not take place within the complaints procedure. They take place within the context of corrective action/preventive action (Q24 - *Continuous Improvement*) or in the enforcement of program requirements within any of the affected programs.

The investigator will normally acquire information to establish the facts surrounding the complaint. This may include making inquiries to the complainant or appellant, querying the organisation or person that is the object of the complaint, or obtaining information from other sources without revealing any source of complaint or the identity of the organisation or person named as the object of the complaint.

Investigation of a complaint consists **solely** of comparing requirements to actual events. The only requirements that can be compared to actual events are those published CALA requirements that affect the required conduct of the organisation or person named as the object of the complaint. Unpublished procedures and policies do not apply.

From this comparison, the investigator is able to establish whether the facts substantiate the complaint.

2.5.3 Resolution Procedure for Complaints

The Quality Coordinator notes any suggested solutions and passes the F03 - *Feedback Form* to the Manager of the affected CALA program for implementation of the suggested solution, if that solution is within the purview of the Manager of that program. The Manager signs off to close the complaint and indicate the implementation of the solution and any raised ICARs.

If implementation of the suggested solution requires more authority than that vested in the Manager of the affected CALA program, then the CEO, or through the CEO, a member of the Board of Directors, will be approached to execute the suggested solution. The person selected is named as the *Final Review* in Section 3 of the F03 - *Feedback Form* and signs off on the implementation of the suggested solution and any raised ICARs.

The Training Assistant tracks complaints to closure.

The Quality Coordinator closes the complaint in the Feedback log.

2.5.4 Use of Sanctions within CALA Programs

If a complaint is raised against a laboratory that participates in either the CALA accreditation program or the CALA proficiency-testing program, resolution of the complaint can only be done with the affected program. Due to non-conforming behaviour of the laboratory, CALA may be required to exercise program sanctions in order to ensure their compliance with the terms and conditions of their accreditation or recognition.

This approach does not resolve a complaint, rather it is used solely to ensure compliance to the terms and conditions of accreditation or recognition.

Initiating the use of sanctions resides solely within the purview of the Managers of the affected program. Managers may only resort to sanctions if a complaint investigation results in its substantiation. This is to ensure that the implementation of sanctions is clearly the result of non-conforming behaviour by the laboratory / person who is the object of the complaint - and not the result of the complaint or its investigation.

Implementation of sanctions may require review by an independent panel (Advisory Panel, Accreditation Council, or Board of Directors) or other body with the authority to render such a decision. This review is to be documented as part of the Feedback Log entry on the complaint.

The following table provides guidance in the development of solutions that include the use of sanctions.

Criteria	Questions	Response	Result
Affect on the integrity and/or credibility of CALA programs.	Is the substantiated complaint a breach of agreement with CALA? Or a breach of published policy?	No	No action required
		Yes	Treat as Required Action (A)
Affect on the ability of the lab to produce competent results.	Would the substantiated complaint result in a required action A if it were to be discovered during an assessment?	No	No action required
		Yes	Treat as Required Action (A)

The imposition of sanctions for failures to respond to required actions depend on the seriousness of the non-conforming condition and the demonstrated willingness to conform. Managers will normally consider these aspects when attempting to enforce the terms and conditions of accreditation or proficiency testing recognition.

Once sanctions have been initiated, the complaint is considered closed.

2.6 Review of Compliments and Complaints

Compliments and complaints are reviewed by the CALA Quality Coordinator. Significant complaints are reviewed by the CEO and may be reviewed by a Panel of the Board, including the President.

All feedback is reviewed by the CALA Management Review Committee during the Board meeting held in conjunction with the CALA AGM.

2.7 Completion and Closure

2.7.1 Compliments and Complaints

Compliments are formally passed to the organisation or person being commended.

As soon as the investigation of a complaint is completed, and a decision on the issue of a non-conformance or opportunity for improvement is made, the complainant is notified in writing of these facts. If the complaint is not substantiated, the complainant is referred to the documentation that supports such a decision. If the complaint is substantiated, the complainant is informed of the nature and extent of corrective action taken to prevent recurrence.

If sanctions are applied following the complaint of a participant organisation, the complainant will be informed that sanctions have been applied, but not the nature and extent of these sanctions.

2.8 Forms and Logs

The formats of the forms and logs associated with this procedure are:

- F03 - *Feedback Form; and,*
- F04 - *Feedback Log.*