Q25 - Feedback within CALA Programs **Revision 4.1** - October 7, 2016



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FEEDBACK WITHIN CALA PROGRAMS

1.0 THE POLICY

CALA will actively seek feedback from its customers, members and interested parties.

CALA maintains records of 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.

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. A summary of feedback received is normally reported to the Board of Directors during the board meeting following the annual Management Review.

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.

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1.3 Definitions

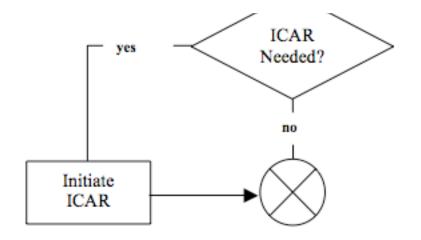
1.3.1 Compliment

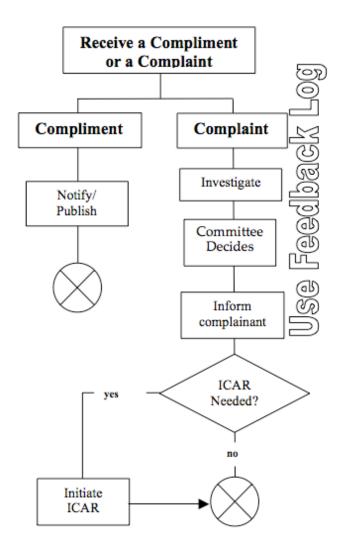
Any written expression of satisfaction or congratulations concerning any aspect of CALA.

1.3.2 Complaint (*from ISO/IEC 17011, clause 3.9*)

Any expression of dissatisfaction, other than appeal, by any person or organization relating to the activities of CALA or an accredited laboratory, where a response is expected. Note that complaints received over the phone shall be recorded by the staff member in order for it to be documented and tracked.

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2.2 Start Points

<u>Program Feedback</u>: 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 at the end of each training course. 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 program staff. Records of their implementation and use are contained in management meeting minutes, management review minutes and other similar records.
- 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 the CALA accreditation program, or a laboratory recognised through the CALA proficiency testing program. 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). At the discretion of the CEO or relevant manager the compliment may be circulated to all staff.

Complaint: Complaints received by CALA are an indication that a problem may exist which has been perceived only from the outside.

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

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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 members receiving a complaint are encouraged to resolve it to the satisfaction of the complainant immediately if possible. A record of actions taken shall be entered 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.

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 or their manager, whether or not they are able to solve the complaint immediately.
- o The CEO will promptly inform the Board Chair and directors.

Compliments and complaints received by CALA staff shall be entered directly in the Feedback log (located at CALA server/Quality System/Feedback) by the person receiving the feedback and the Quality Coordinator notified.

In the event that a complaint refers to another organisation, the complaint may be forwarded to that organisation for their action or information, provided this action is appropriate and agreed to by the complainant.

The Quality Coordinator will review all feedback entered in the feedback log.

The Feedback Log will include at a minimum:

- Feedback number, year and number format(e.g. 2016-001 etc.)
- o The date the complaint was received,
- o The complainant,
- o The issue,
- o The employee assigned to investigate/resolve/follow up,
- Summary of the resolution.
- o ICAR no. where applicable
- Link to supporting documents/emails.

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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, or other stakeholders.

2.5 Investigation and Adjudication

2.5.1 Initiating an Investigation of a Complaint

The Quality Coordinator notifies 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 investigator notes the courses of action in the Feedback log, and notifies the Quality Coordinator.

In carrying out the investigations, the investigator should consider the following:

- o Has the complaint been substantiated?
- Is the credibility of the applicable CALA program affected?
- o Was there a breach of CALA Policy/Procedure?

Any yes answers to these questions require some action from CALA

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2.5.2 General Conduct of an Investigation

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. 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*.

The investigator shall ensure confidentiality is maintained while investigating the issues with respect to complaints. Where possible, obtain 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 reviews any suggested solutions with 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 Quality Coordinator or Manager of affected program 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 QC or 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 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.

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

The CALA Quality Coordinator reviews compliments and complaints. Significant complaints are reviewed by the CEO and may be reviewed by a Panel of the Board, including the Board Chair.

The CALA Management Review Committee reviews a summary of feedback during the annual management review.

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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:

o F04 - Feedback Log.

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