

WATER STEWARDSHIP ASSURANCE SERVICES
(WSAS)

Complaints and Appeals Procedure

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1. Introduction

Water Stewardship Assurance Services (WSAS) is the sole mission-driven Conformity Assessment Body (CAB) for the Alliance for Water Stewardship (AWS) System.

The purpose of this procedure is to define the process for handling any complaints or appeals arising from the activities of WSAS, or the activities of any Site certified by WSAS. WSAS will deal with all complaints and appeals in an impartial and effective manner, to maintain the integrity of the Alliance for Water Stewardship (AWS) System and the WSAS certification scheme. All complaints will be dealt with in a transparent and timely manner.

The Complaints and Appeals Procedure will be subject to an annual review through the internal audit programme, to improve the WSAS operational systems, processes, and procedures.

2. Scope

This procedure outlines the process for handling all Complaints against WSAS or a Site that is applying for certification or certified by WSAS. The types of Complaints that will be handled under this Procedure include but are not limited to:

Complaints against WSAS:

- Complaints against a WSAS decision
- The conduct of a WSAS Auditor or Audit Team
- The timeliness of the evaluation process
- Complaints against a WSAS procedure or process

Complaints against Sites:

- Sites being in breach of the AWS Requirements or WSAS Requirements
- Sites bringing the AWS System into disrepute.

This procedure also outlines the Appeals process, and applies to any appeals against a decision taken by WSAS related to a certification process, a suspension, a withdrawal of certificate or a complaint.

The following elements are excluded from this procedure: If the complaint or appeal is regarding the AWS Standard and any requirements set out within the AWS requirements, then the complainant will be directed towards the 'AWS Comments, Complaints and Appeals Procedure' and the AWS 'Complaints Form'.

3. Responsibility

It is the responsibility of the appointed WSAS Complaint Handler to oversee and conduct the complaint or appeal handling process in an impartial manner. WSAS will ensure that the appointed WSAS Complaint Handler has been independent from the evaluation

process, so they are free of any conflicts of interest and can conduct the investigation in an impartial manner. They will be responsible for gathering sufficient information regarding the complaint to carry out an effective investigation. They will be responsible for all communications related to the complaint and will oversee any root cause determination, corrective and preventive actions.

4. Definitions

Appeal means a request by a complainant or certified site for a review or reconsideration of an adverse decision made by WSAS.

Appeals Panel means the Certification Advisory Committee functioning as an impartial Appeals Panel.

Appellant means the certified Site or complainant that is appealing the decision made by WSAS that is the subject of any given appeal.

AWS Requirements means the requirements laid out in the AWS International Water Stewardship Standard v2.0, AWS Certification Requirements, AWS Requirements for Conformity Assessment Bodies, and any AWS Policies that are relevant for the certification.

Certification Advisory Committee means independent committee composed of experts that are independent of AWS, WSAS and AWS members, that has the role to provide advice to WSAS on certification-related topics, to ensure impartiality of the audit and certification processes and to handle appeals.

Complaints means an expression of dissatisfaction or a grievance by any stakeholder or certified site, relating to the activities of WSAS or the conduct of a certified site.

Complaints Handler means a member of staff of WSAS who has been appointed to conduct the complaint investigation and take responsibility for the complaint handling process.

Disputes means a minor disagreement, an issue that can be resolved informally through a phone call or email, without having to escalate it to a formal complaint.

Escalation Process means a mechanism by which WSAS, a stakeholder or a certified site, can address a problem relating to the certifications scheme.

Stakeholder means any individual or group that has an interest in any decision or activity of a certified site.

WSAS Requirements means the requirements laid out in the WSAS Certification Agreement.

5. Complaint Handling Process

All Complaints must be submitted by completing the online 'Complaints Form' on the WSAS website (www.watersas.org). Once WSAS is in receipt of the complaint and has

confirmed that it is within the scope of this procedure, then an independent Complaint Handler will be appointed. WSAS will ensure that the Complaint Handler has not been involved in the audit of the Site or involved in the WSAS process that a complaint has been lodged against, and is therefore free of any conflicts of interest.

An acknowledgement email will be sent to the complainant within 5 working days, confirming receipt of the complaint, and outlining the next steps in the Complaint Handling process. The Complaint will also be logged in the 'WSAS Complaint Log' where all key details relating to the complaint and the investigation will be recorded.

The Complaint Handler will gather information and records relating to the complaint from both parties and carry out a comprehensive investigation to determine the root cause. They will also be responsible for preparing an investigation report and compiling a response to the complainant. Under normal circumstances, WSAS will endeavour to complete the investigation and compile the report within 90 days of acknowledging the complaint.

If the Complaint is against a Site certified by WSAS, then the Complaint Handler will contact the Site's main contact to inform them of the nature of the complaint and request that all relevant information relating to the complaint, be submitted to WSAS for review. All communications will clearly indicate the timescale for submitting the information and what the next stages in the process will be. Failure to meet the timescales or submitting misleading information may lead to the suspension of certification.

If the Complaint is against a WSAS Process, Procedure or Auditor, then the Complaint Handler will review the complaint and establish whether the process or procedure was followed by the relevant WSAS staff. If the complaint is against a WSAS Auditor or Audit Team, then the Complaint Handler will interview all relevant parties to establish whether the complaint has any merit and what the implications are, if any, on the audit outcome.

A complaint may be rejected if there is insufficient information or supporting evidence to uphold the complaint.

If the Complaint is rejected, then the Complaint Handler will inform the Complainant of the outcome of the investigation and formally close out the complaint on the 'WSAS Complaint Log'. The complainant will be notified of the Appeals Process, should they wish to appeal the outcome of the investigation.

If the Complaint is upheld, then the Complaint Handler will notify all parties of the outcome of the investigation and outline the next steps to resolve the root cause of the complaint. This could include amending operational procedures, reinstating the certification status of a Site, additional training for WSAS staff, granting certification to an applicant or disciplinary actions.

The Complaint Handler will be responsible for overseeing the implementation of any corrective and preventive actions, before the complaint can be formally closed on the 'WSAS Complaint Log'.

If a complaint against a certified Site remains open and WSAS is unable to resolve it, due to the certified Site not addressing it to the satisfaction of WSAS, then it can escalate into the suspension or withdrawal of the certificate. This will be undertaken in accordance with WSAS's Standard Operating Procedures.

If the complaint investigation requires an additional site visit or the appointment of a technical expert, then this may be charged to the certified Site and WSAS reserves the contractual right to charge a fee for any expenses incurred when conducting the investigation.

6. Appeals Handling Process

An Appeal can be initiated by a Stakeholder, Applicant or certified Site, if they wish to appeal a decision undertaken by WSAS. This could be (but is not limited to) an appeal against:

- a Certification Decision (e.g. level of certification)
- the Suspension of a certificate
- the Withdrawal of a certificate
- a decision to uphold or reject a complaint

A request for an Appeal may be submitted up to 30 days after the decision in question was taken by WSAS. All Appeals must be instigated by completing the 'Appeals Submission Form' on the WSAS website (www.watersas.org) and WSAS will acknowledge receipt of the Appeals request within 5 working days.

WSAS will utilise the Certification Advisory Committee as the Appeals Panel, as members of this committee are independent from WSAS and AWS. The Appellants will be notified of the timescale for convening the Appeals Panel in writing, which, under normal circumstances shall be no longer than two (2) months.

The Appeals Panel will be presented with the full complaint investigation file for review, which has been collated by the Complaint Handler, including all records pertaining to the complaint. The Appeals Panel will make a decision by simple majority vote and the decision of the Appeals Panel is final.

If the Appeal is rejected by the Appeals Panel, then the initial decision made by WSAS continues to stand and the Appellant will be required to act accordingly. WSAS will inform the Appellant of the outcome and outline the implications of the decision i.e., corrective and preventive actions, suspension or withdrawal of certificate.

If the Appeal is upheld by the Appeals Panel, then WSAS will reverse the decision that led to the Appeal and review the impact of the decision on operational activities.

WSAS will inform the Appellant of the outcome and outline what actions WSAS will undertake in response to the decision, ensuring that preventive actions are implemented in an effective manner.