

FEEDBACK PROCEDURE

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1 PURPOSE OF PROCEDURE

This document explains how we deal with complaints, appeals, disputes and compliments.

2 RESPONSIBILITY

2.1 Chief Executive

Responsible for ensuring that a suitable and effective feedback procedure is established and maintained.

2.2 Operations Manager (Secretariat)

Responsible for ensuring that:

- this procedure is administered effectively by the Secretariat and implemented as required by RDL
- complaints, appeals and disputes are periodically analysed and reported to the Standards Committee

and for

- the management of the feedback database including its maintenance and configuration.

2.3 Feedback Administrator

A member of the certification staff is designated as the Feedback Administrator to be responsible for recording information onto the feedback database and prompting responses, as required, within service response targets.

3 DEFINITIONS

3.1 Complaint

A complaint is an expression of dissatisfaction made to an organisation, related to its products, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected (BS ISO 10002-2004).

3.2 Appeal

A formal request to reconsider a decision made.

3.3 Dispute

A disagreement of something stated, i.e. to question the truth or validity of a statement.

3.4 Compliment

Any positive feedback related to RDL including its, scheme, personnel, products/services or quality of service.

4 Records

Feedback falling within the categories listed below shall be recorded.

1. Appeals against RDL's assessment or evaluation decisions and disputes about statements made by RDL.
2. Complaints about RDL's certification schemes or failure by RDL to provide satisfactory service, involving financial loss, material distress or material inconvenience.
3. Complaints about suppliers of certified products or the products themselves which are not necessarily directly related to RDL's service (e.g. complaints made by home occupiers about sound transmission through built robust details).

4. High profile complaints where, for example, legal action, politicians, Government departments, consumer groups and the media are involved, or where there is a risk that they may become involved.
5. Complaints which represent a risk to the loyalty of a major customer or RDL's relationship with it.
6. Complaints which do not fall within the above categories but which appear to be of equivalent significance to RDL and/or its stakeholders.

5 HANDLING COMPLIMENTS

Details should be passed to the Feedback Administrator and entered onto the feedback database. The Feedback Administrator should notify the Operations Manager who should then decide on, and implement, any further action (e.g. thanking and giving recognition to a member of staff).

6 LEVELS FOR HANDLING COMPLAINTS, APPEALS AND DISPUTES

6.1 Complaints

There are three escalating levels. RDL aims to resolve all complaints at level 1. However, if the complainant is not satisfied with the outcome at this level, there is recourse to a second level and, in some cases, a third level.

6.1.1 Level 1 Investigation and response

The case shall be assigned to the appropriate person (as specified in Appendix 1) who shall aim to investigate and respond within the target response times stated in Appendix 2. If a conflict of interests arises, it shall be declared and an alternative person assigned to investigate and respond.

6.1.2 Level 2 Internal review

In the event that the complainant is not satisfied with RDL's response, he/she may ask for the case to be escalated to Level 2. RDL may agree to a level 2 review if the complainant can provide a convincing argument or evidence in support of the complaint. A senior person who, independent of any previous involvement, shall then review the case. This will normally be the Chief Executive, other director or member of the Standards Committee.

6.1.3 Level 3 panel review

If the complainant is not satisfied with a level 2 review, RDL will, in cases which could potentially affect the certification scheme's reputation or key stakeholders' satisfaction, create an ad hoc panel consisting of at least 2 people drawn from the Standards Committee who have not had any previous involvement in the case. The panel shall review the case and submit recommendations with supporting arguments on:

- whether to uphold or overturn RDL's previous response
- what, if any, action shall be taken.
- The executive shall then implement the decisions of the Standards Committee.

6.2 Appeals and disputes

In the first instance, all appeals and disputes shall be referred to the Chief Executive who will carry out an investigation.

If the original decision (in the case of an appeal) or statement (in the case of a dispute) was made by a member of the executive, the process and levels set out in section 6.1 above for complaints shall apply in principle. RDL may agree to a level 2 or 3 review if the person appealing against a decision or disputing a statement can provide evidence that the decision or statement is wrong; or, if disputing an RDL opinion, give a good reason why it is considered unreasonable.

If the original decision or statement was made by the Board or a Committee of the Board, the appeal or dispute shall be investigated by the Chief Executive and a full report provided to the Chairman of the corresponding Board or Committee. The corresponding Board/Committee shall then review the original decision or statement in the light of the report. It shall then confirm or amend its original decision and notify the person making the appeal or disputing a statement.

If that person is not satisfied with the response, RDL may agree to a final review by the Standards Committee or the Board (if the original decision or statement was made by the Standards Committee). However, this is subject to the person providing evidence that the decision or statement is wrong or, if disputing an RDL opinion, giving a good reason why it is considered unreasonable.

7 PROCESSING COMPLAINTS, APPEALS AND DISPUTES

7.1 Assigning cases

Complaints, appeals or disputes shall not be assigned to anyone who has any relationships that could compromise the impartiality of an investigation. If any conflict of interests arises, it shall be declared and the case shall be assigned to an alternative person.

Subject to the above, the case shall be assigned by the Respond Administrator as specified in Appendix 1.

In cases of doubt, or in the unlikely event that a case does not fall within the scope of Appendix 1, the Respond Administrator shall refer it to the Operations Manager or, if unavailable at the time, a Technical Advisor who shall then decide on who the case will be assigned to.

Where complaints, appeals or disputes relate to the Code for Sustainable Homes, the associated technical guides or other supporting documents or requirements that are outside the control of RDL, the case shall be reported to BRE Global who manage the scheme and sub-licensing on behalf of CLG.

7.2 Investigations

The person handling the case shall investigate it and determine whether it is valid.

Investigations will vary depending upon the nature of the complaint, appeal or dispute. The investigator shall, whenever appropriate, ensure that the person raising a complaint, appeal or dispute is consulted and informed of progress. He or she should be informed of the feedback procedure and what to expect from it, and a common understanding of the case should be established.

In the case of complaints, the investigator should consider and use, if appropriate the checklist at Appendix 3. This checklist will not normally be suitable for consumer complaints about sound insulation since these usually require advice on how to progress a complaint elsewhere.

In the event that the case involves more than one feedback issue (e.g. a complaint about fee levels and quality of service), the person handling the case shall ensure that the relevant person for each issue is consulted before a response is completed.

7.3 Decisions

7.3.1 Valid complaints, appeals and disputes related to the provision of a certification scheme

In the event that RDL was at fault, rectification and/or corrective action shall be taken, if appropriate, in accordance with RDL's Nonconformities procedure (RD006). The results of any previous, similar cases should be taken into account.

Where a case is found to be valid (against RDL), the person handling the case should consider what, if any, goodwill gesture should be offered to the complainant. Approval by the Chief Executive for any expenditure required before any such offer is made.

7.3.2 Valid complaints relating to certified RD products or their suppliers (RD scheme only)

This section of the procedure is based upon the proposals set out in the public consultation document for the then proposed Robust Details scheme (*The Building Act 1984 – The Building Regulations 2000 – Amendment of the Building Regulations to allow Robust Standard Details to be used as an alternative to pre-completion testing*, August 2003, Office of the Deputy Prime Minister).

This indicated that, because all Robust Details would be built to standard patterns, it could be said that there would be at least as good a chance of the Robust Details meeting the requirements as with PCT (where around only one pair in ten dwellings was tested). It also said that, if the householder felt that the standards for sound insulation were not being met when Robust Details had been used, they would have exactly the same route for redress as with PCT after occupation.

In view of this, the document proposed that there should be no complaints procedure for RDs over and above that which already existed for other parts of the regulations. However, it stated that the existing procedure should be made clear to dissatisfied purchasers.

When responding to complaints from homeowner/occupiers about sound transmission through Robust Details structures, the response should provide advice on the existing procedure for complaints relating to Building Regulation compliance. The advice contained in the full response should be based upon RD233 “guide response to consumer complaints”.

7.3.3 Valid complaints, appeals and disputes relating to the Code for Sustainable Homes (CSH) Code Service Provider (CSP) scheme

RDL shall notify BREG of any complaints, appeals or disputes made against RDL in relation to the Code certification services.

8 TARGET RESPONSE TIMES

Complaints, appeals and disputes should be acknowledged promptly within the target timescale specified (Appendix 2) unless a full response is given within the same timescale.

Cases should be investigated promptly and a full response should be given within the target timescale specified (Appendix 2).

9 CLOSING COMPLAINTS, APPEALS AND DISPUTES

Cases may be **closed** by the Feedback Administrator when:

- RDL's full response at level 1 has been sent; or
- the complainant has indicated they no longer wish to pursue the case.

Any case may be reopened at any time if the complainant is not satisfied with the full response at level 1. Similarly, cases may be closed after any level 2 response has been given but may be reopened if eligible for a level 3 panel review.

10 RECORDS

The minimum details to be recorded are listed in Appendix 4.

All correspondence, including the completed response, and all other pertinent information (including any investigation checklist) should be made available to the Feedback Administrator promptly throughout.

The Feedback Administrator shall record these details onto the feedback database promptly in order to maintain an up to date record of the case at all times.

11 REPORTING

The executive shall analyse feedback data and information and provide regular reports to the Standards Committee.

12 DOCUMENTS RELATED TO THIS PROCEDURE

- Feedback database
- RD006 Nonconformities
- RD233 Guide response to consumer complaints (RD scheme only).

Appendix 1 Assignment of complaints, appeals and disputes

Category		Assign to	Response Approval
1	Appeals against RDL's assessment or evaluation decisions and disputes about statements made by RDL.	Chief Executive	Chief Executive
2	Cases about the provision of, or failure to provide, satisfactory service by Robust Details, involving financial loss, material distress or material inconvenience [unless also category 2, 3 or 4 which take priority Technical service Sales and administration Other operational services	Technical Advisor Senior Administrator or Administrator or Technical Advisor Operations Manager or Technical Advisor	Operations Manager Operations Manager Chief Executive
3	Complaints about suppliers of certified products or the products themselves which are not directly related to RDL's service (e.g. complaints made by home occupiers about sound transmission through built robust details).	Operations Manager or Technical Advisor	Chief Executive
4	High profile cases* – for example, where one or more of the following are, or are likely to become, involved: legal action, politicians, Government departments, consumer groups, media and industry bodies.	Chief Executive	Chief Executive
5	Cases which represent a risk to the loyalty of a major customer or RDL's relationship with it	Chief Executive	Chief Executive
6	Cases which do not fall within the above categories but which appear to be of equivalent significance to RDL and/or its stakeholders	Operations Manager or Technical Advisor	Chief Executive

*Cases are high profile if, for example, they involve one or more of the following:

- politicians - MPs, MEPs (Members of the European Parliament), AMs (Members of the Welsh Assembly)
- Government Departments, including Communities and Local Government (CLG), the Office of Fair Trading (OFT), the Department of Trade and Industry (DTI)
- consumer groups or enforcement organisations, including the Citizens Advice Bureau (CAB), Trading Standards, the Consumers Association etc.
- broadcast, print and online media
- industry bodies such as Trade associations, HBF, the Building Control Performance Standards Advisory Group (BCPSAG), Building Regulations Advisory Committee (BRAC), BREG or the Construction Industry Council (CIC)
- actual or threatened legal action against RDL, its directors or its employees
- alleged negligence against RDL, its directors or its employees
- potential or actual serious conflicts with a major customer (an example of major customer = large builder).

Appendix 2 Target response times

The target deadlines for responding to complaints, appeals and disputes at level 1 are:

- written acknowledgement within 3 working days of receipt
- full written response (or, if this is genuinely not possible, a written holding response explaining what is happening/what we are doing) within 10 working days of receipt.

The target deadlines for responding to cases at level 2 (internal review) are:

- full response within 4 weeks of receiving request for an internal review

The target deadlines for responding to cases at level 3 (panel review) are:

- full response within 12 weeks of receiving request for a panel review

Appendix 3 Investigation checklist guide (optional)

Investigations should include an analysis of any alleged gap between how RDL should have acted and how it actually acted. The analysis should consider and record the following:

1	What should have been provided? What was expected?	
2	What was provided? What actually happened?	
3	Is there a difference between 1 and 2?	
4	If the answer to 3 is yes, why?	
5	If the answer to 3 is no, why does the complainant think otherwise?	
6	What was the impact of 4?	
7	Was the complaint justified or partially justified?	
8	What should be done to put things right?	
9	What should be done to avoid a reoccurrence (defined as corrective action in Quality Manual)?	
10	How will the effectiveness any corrective action be followed up?	

Appendix 4 Details to be recorded

The minimum information required for a formal complaint, appeal or dispute is:

- customer's name and title
- customer's contact details, including telephone number
- date received by RDL
- description of complaint, appeal or dispute
- any useful reference numbers, if known, e.g. unique dwelling reference number, builder or developer name, address, etc.
- the investigation (if applicable)
- the outcome
- all details necessary to monitor and report on the required response times
- any other information required for mandatory fields in the Respond software application.