

SBP

Sustainable Biomass Program

SBP Complaints Procedure

www.sbp-cert.org



Version 1.1 January 2019

Adapted from Reference source: *Processing Complaints in FSC® Certification Scheme FSCPRO-01-008 (V2-0) EN; ASI Complaints Procedure ASI-PRO-20-104-Complaints - V4.0*

For further information on the SBP Framework and to view the full set of documentation

see www.sbp-cert.org

Document history

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1 General principles

- 1.1 This procedure outlines the processes to be followed when any person or organisation expresses dissatisfaction to SBP relating to its activities, the activities of an SBP Certification Body (CB) or an SBP certificate holder.
- 1.2 Disputes should be always addressed at the lowest level possible:
 - 1.2.1 Disputes should be resolved in the first place by discussion and negotiation or mediation. Formal procedures, including committees, should only be adopted as a last resort.
 - 1.2.2 Stakeholders are strongly encouraged to follow this principle prior to bringing a complaint to SBP.
- 1.3 To be accepted and classified as a complaint, it shall:
 - 1.3.1 Be in writing (email/letter);
 - 1.3.2 Be submitted in English. Other languages may be accepted by SBP on a case by case basis;
 - 1.3.3 Include a detailed description of the complaint; and
 - 1.3.4 Include evidence to substantiate any complaint.
- 1.4 Complaints based upon hearsay or anonymous submissions shall not be accepted.
- 1.5 SBP shall consider complaints from:
 - 1.5.1 Any person or organisation expressing dissatisfaction regarding SBP's activities; or
 - 1.5.2 Any person or organisation expressing dissatisfaction regarding the activities of an SBP CB or certificate holder, where the complaint has not been satisfactorily addressed by the CB.
- 1.6 For a complaint about the activities of a CB and/or a certificate holder to be considered by the SBP appointed staff member, the following shall all apply:
 - 1.6.1 The complainant shall first have been directed to the CB for action;
 - 1.6.2 In the view of the complainant, the complaint has not been satisfactorily addressed and resolved by the CB after the implementation of the CB's own complaints procedure; and
 - 1.6.3 The complaint shall be related to activities under the authority of SBP.

2 Processing a complaint

- 2.1 This procedure applies to all complaints except those about SBP staff members or contractors to SBP (see 3 below).
- 2.1.1 An assigned staff member shall aim, within 10 days of receipt of the complaint, to acknowledge receipt of the complaint and analyse by which process the complaint shall be dealt with and inform the complainant and any other involved parties.
- 2.1.2 An assigned staff member shall aim, within 30 days of the receipt of the complaint, to contact the parties to the complaint by e-mail or phone to attempt to informally resolve the issue in direct communication. The assigned staff member shall keep a record of the conversations, including date, time and a summary of issues discussed, as well as a copy of all hardcopy and electronic communication.
- 2.1.3 If an informal resolution is not possible, the assigned staff member shall investigate the issue and provide the SBP Chief Executive Officer (CEO) with a recommendation on the complaint.
- 2.1.4 The SBP CEO shall then initiate a formal complaints procedure; this may include asking the assigned staff member, or assigning another member of staff or an outside 'investigator', to investigate the matter further.
- 2.1.4.1 The investigator can be a team of individuals;
- 2.1.4.2 If the investigator is independent of SBP he/she shall be provided with a copy of the complaint file, including all relevant documentation and correspondence;
- 2.1.4.3 The investigator shall be independent of the complainant and subject matter of the complaint.
- 2.1.5 The SBP appointed staff member or appointed investigator shall conduct an appraisal to determine the appropriate assessment type of the complaint investigation, which may be a desk review, on-site assessment, or compliance assessment, or any other type of assessment deemed appropriate to investigate the complaint received.
- 2.1.6 Additional information may be requested from the complainant, the defendant, third parties named as sources of information in the complaint or other parties likely to have information relevant to the investigation.
- 2.1.7 In the case of a complaint about CB performance:
- 2.1.7.1 If a complaint investigation confirms non-conformity with relevant certification and/or SBP CB accreditation requirements, SBP reserves the right to request ASI to require the CB to correct the non-conformity and to take other actions that SBP deems appropriate.
- 2.1.7.2 SBP reserves the right to invoice the full person time and expenses needed for complaints investigations resulting in certificate holder non-conformity to the respective CB at the SBP full daily rate.

- 2.1.8 The SBP CEO shall provide the parties to the complaint with a response within 60 days from receiving the complaint. The response shall include a conclusion on the complaint, the rationale for the decision and, if applicable, any follow up measures to be taken.
- 2.1.9 The lack of cooperation by the complainant may be considered as grounds for discontinuation of the procedure. The SBP CEO shall decide if a complaint procedure shall be discontinued.
- 2.1.10 If no further issue arises, the complaint is considered resolved and the respective case file closed.
- 2.1.11 If all parties affected by the complaint agree in writing, a summary of the SBP complaint investigation may be published on the SBP webpage.

3 Complaints about SBP staff

- 3.1 A complaint about the SBP CEO shall be forwarded to the Chair of the SBP Board for review and allocation of action.
 - 3.1.1 The Chair of the SBP Board shall ensure that appropriate measures to address the complaint are implemented.
- 3.2 A complaint about all other SBP personnel (including contractors) shall be forwarded to the CEO for review and allocation of action. The complaint about SBP personnel shall be investigated and addressed according to the instructions laid down in this procedure and any relevant legal requirement in order to protect the rights of SBP personnel.
 - 3.2.1 The CEO shall allocate each complaint either to the SBP appointed staff member or appoint an 'investigator', who shall either be from amongst SBP personnel or may be independent of SBP.
 - 3.2.1.1 The investigator can be a team of individuals;
 - 3.2.1.2 If the investigator is independent of SBP he/she shall be provided with a copy of the complaint file, including all relevant documentation and correspondence;
 - 3.2.1.3 The investigator shall be independent of the complainant and subject matter of the complaint.
 - 3.2.2 The investigator or the SBP appointed staff member may contact the complainant or any other party related to the complaint to obtain additional information as necessary.
 - 3.2.3 The investigator or the SBP appointed staff member, having reviewed all available information, shall make a decision on whether the complaint is justified, and shall report back to the CEO.
 - 3.2.4 The CEO shall ensure that SBP implements appropriate measures to address the complaint.
 - 3.2.5 The investigator or SBP appointed staff member shall inform the complainant on actions taken by SBP to address and resolve the complaint, providing that confidentiality is not breached.
 - 3.2.6 Complaints about SBP personnel, including relevant correspondence and measures taken, shall be retained for seven years.
 - 3.2.7 If the complainant is not satisfied with the outcome of the complaint investigation, the complainant, after discussing the outcome with the CEO, may elevate the complaint to the Chair of the SBP Board for review and allocation of action. In such instances, the CEO shall facilitate communication between the complainant and the Chair of the SBP Board.

4 Appeals

- 4.1 In the event of any of the parties being dissatisfied with the outcome of the complaint, the SBP Appeals Process may be used.
- 4.2 In the event of any of the parties being dissatisfied with the outcome of the complaint regarding an SBP staff member, the case may be elevated to the SBP Chair of the Board (see 3.2.7 above).