

上海英格尔认证有限公司
**Shanghai Ingeer Certification Assessment Co.,
 Ltd.**

申诉、投诉、争议处理程序
Appeal, Complaint and Dispute Handling Procedure

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1.新增食品安全管理体系（FSMS）关于“申诉”的内容； 2.新增部分条款翻译； 3.新增引用文件		P4-P5 P8-P9 P12	2021.3.23	杨宏奇 Yang hongqi
1.新增 HACCP 体系关于“申诉”的内容； 2.新增引用文件		P4-P5 P12	2022.01.05	杨宏奇 Yang hongqi
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1.0 目的 Objective

为保证上海英格尔认证有限公司（以下简称 ICAS）认证工作的公正性，以顾客为中心，有效地处理申诉、投诉和争议，制订本程序。

The purpose of this procedure aims at ensuring the justice of Shanghai Ingeer Certification Assessment Co., Ltd. (hereinafter referred to as ICAS), client-oriented, the effective handling of appeal, complaint and dispute.

2.0 范围 Scope

本程序适用于与 ICAS 认证服务有关的被认证方、及相关的组织、个人或任何相关方。

This procedure applies to the certified parts, relevant organization, individual or any other relevant parts related to the service of ICAS.

3.0 定义 Definition

3.1 申诉：当被认证组织的认证状态直接受到 ICAS 认证决定影响时作出的不满意的正式的书面或口头声明。

Appeals: A dissatisfied and formal written or oral statement made by the certified organization when their certification status is affected directly by ICAS's decision.

3.2 投诉：对 ICAS 的认证服务或人员、ICAS 认证的客户、产品的不满意的正式书面或口头声明。

Complaints: A dissatisfied and formal written or oral statement to the certification service, staffs, clients and products of ICAS.

3.3 争议：被认证组织与 ICAS 在认证程序和认证技术问题方面不同意见的口头或书面的表述。

Dispute: An oral or written expression with disagreement in the respect of certification process and certification technology between the certified organization and ICAS.

4.0 职责 Responsibility

4.1 最高管理者指定管理委员会负责人作为申诉的管理代表协调和处理申诉。市场部经理作为投诉的管理代表协调处理投诉，注册部经理作为争议的管理代表协调和处理争议。

The top management designates the director of management committee as the management representative to coordinate and handle appeal. The marketing manager is

the management representative to coordinate and handle complaint. The registration manager is the management representative to coordinate and handle dispute.

4.2 市场部申投诉受理专员负责对申、投诉的接收、确认、跟踪、记录、回复、上报。

The special person of market department for dealing with appeals and complaints is responsible for the acceptance, confirmation, following-up, record, replying and submission of appeals and complaints.

4.3 与申投诉无利益关系的各主管人员负责协助调查申投诉：

- 1) 市场部经理负责有关认证业务受理过程中的申投诉；
- 2) 审核部经理负责有关审核非现场的申投诉；
- 3) 审核组长负责审核现场的申投诉；
- 4) 审核员管理专员负责对审核员的投诉；
- 5) 注册部经理负责有关认证决定过程的申投诉；
- 6) 管代负责有关管理层的申投诉。

Other supervisors, who have no interest relationship with appeals and complaints, are responsible for assisting with the investigation of appeals and complaints.

- 1) Marketing manager is responsible for appeals and complaints during the handling process of certification business.
- 2) Audit manager is responsible for off-site appeals and complaints about the audit.
- 3) Audit group leader is responsible for on-site appeals and complaints about the audit.
- 4) Audit management specialist is responsible for complaints about auditors.
- 5) Registry manager is responsible for appeals and complaints in the certification decision process.
- 6) Management representative is responsible for complaints about management.

4.4 品管部对整个申投诉处理过程进行监督和抽查；

The QA department supervises and spot checks the whole handling process of appeals and complaints.

4.5 管理者代表负责确保所有改进项得到有效纠正和实施；

Management representative is responsible for ensuring that all the improvements are effectively corrected and implemented.

4.6 人事部、技术资源部为处理申诉、投诉和争议提供所需的资源：包括人员、培训、程序、文件、专家支持、资金等。

Personnel Department and Technical Resources Department provides necessary resources for handling appeals, complaints and disputes: including personnel, training, procedure, document, expert supporting, finance, etc..

5.0 申诉 appeal

5.1 任何对于在认证结果持有不同意见的 ICAS 的客户，可以向 ICAS 提出申诉，申诉的途径可在 ICAS 发出的审核计划中获取。

Client of ICAS who hold different opinions on the certification results can file an appeal with ICAS. The approach of appeals and complaints can be obtained in the audit plan issued by ICAS.

5.2 市场部申投诉受理专员负责受理申诉，在收到申诉的当日向申诉人确认收到，并将申诉上报管理委员会负责人。

The commissioners of marketing department are responsible for accepting appeals. They acknowledge receipt to claimants at the day they receive the appeal, and report it to the director of the management committee.

5.3 管理委员会负责人会同相关人员，对申诉进行调查、核实，听取双方的意见，以及参考以前类似申诉的结果，作出有依据的裁定和决定采用何种措施以回应申诉。

The director of the management committee, together with relevant personnel, shall investigate and verify the appeal, listen to both suggestions, refer to previous similar results, give evidence-based adjudication and decide how to respond.

5.4 申投诉受理专员应向申诉人提供处理的进展情况，并在收到申诉裁定后通知申诉人和相关应采取纠正的人员。

The commissioners of appeals and complaints should provide the grievant with the handling situation and notify the grievant and relevant personnel after receiving the adjudication decision.

5.5 申诉裁决应纠正的人员，应在接到申诉结果的当日，立即按裁决的要求采取必要的措施纠正。

Appealed corrective personnel should adopt corrections according to the adjudication demand at the day of receiving appeal result.

5.6 如对申诉的裁定仍不满意，可以向 ICAS 最高管理者和认可委提出申诉。相关人员应当书面告知获证组织以下信息：

若认为 ICAS 未遵守认证相关法律法规或本规则并导致自身合法权益受到严

重侵害的，可以直接向所在地认证品管部门或国家认监委投诉，也可以向相关认可机构投诉。

If the grievant still dissatisfy with the adjudication, he/she can appeal to the ICAS top management or CNAS. Relevant personnel should inform the certified organization of the information in written as follows:

If the grievant considers that ICAS does not comply with the laws and regulations related to certification or this rule, thus leading to serious violations on its own legal interest, he/she can complain to local regulatory authority, CNCA or related accreditation institutions.

5.7 所有参与申诉处理过程的人员应没有实施申诉涉及的审核，也没有做出申诉涉及的认证决，申诉的决定应由与申诉无关的人员做出，或经其审查和批准。

All personnel participating in the appeal handling process should not implement and decide the related audit. The appeal decision should be given, reviewed and approved by personnel independent of the appeal.

5.8 申诉处理过程不宜超过 30 个工作日（特殊情况下最长不超过 60 日），将处理结果形成书面通知送交申诉人。调查和决定不应造成针对申诉人的任何歧视行为。

对于食品安全管理体系（FSMS）/HACCP 体系，认证委托人如对认证决定结果有异议，可在 10 个工作日内向 ICAS 申诉，ICAS 自收到申诉之日起，应在 30 日内进行处理，并将处理结果书面通知认证委托人。

The appeal handling process should be in 30 workdays (it cannot exceed 60 workdays under special situation), the treated result shall send to claimant with a written notice. Investigation and decision should not cause any discrimination against the grievant.

For the Food Safety Management System (FSMS)/HACCP System, which the certification client has an objection to the result of the certification decision that may appeal to ICAS within 10 working days, ICAS shall deal with it within 30 days from the date of receipt of the complaint, and notify the certification client in writing of the result.

5.9 申投诉受理人员应记录整个申诉的过程，并应保存所有与申诉有关的材料。书面通知中应当告知申诉人，若认为 ICAS 未遵守认证相关法律法规或认证规则并导致自身合法权益受到严重侵害的，可以直接向所在地认证品管部门或国家认监委投诉，也可以向相关认可机构投诉。

对于食品安全管理体系（FSMS）/HACCP 体系，申诉人如认为 ICAS 行为违反了相关法规，处理结果严重侵害了自身合法权益的，可以直接向各级认证品管部门投诉。

The commissioners for appeals and complaints should record the whole process and

keep the relevant data. Claimant shall be notified the following in a written notice: if you think that ICAS has broken related laws & regulations or rules for certification, thus leading serious infringement to your legitimate interest, you can appeal to certification QA department or Certification and Accreditation Administration of the People's Republic of China (CNCA) and to relevant accreditation bodies.

For the Food Safety Management System (FSMS) /HACCP System, if the complainant believes that ICAS has acted in violation of the relevant regulations and that the results have seriously infringed his legitimate rights and interests, he may file a complaint directly with the certification regulatory authorities at all levels.

6.0 投诉处理程序的运作 The operation of complaints handling procedure

6.1 投诉的受理 Acceptance of Complaint

6.1.1 ICAS 市场部申投诉受理专员负责受理投诉，可通过投诉电话 021-51114700 转申投诉受理专员分机，或发送电子邮件至 icasfile@126.com。

The complaint acceptance specialist of ICAS Marketing Department is responsible for accepting complaints. Complaints hotline is 021-51114700 transfer to handling commissioners for appeals and complaints, or the email address is icasfile@126.com.

6.1.2 投诉可以是口头或书面的。投诉人可向受理专员口述事件细节，或提供《申诉、投诉、争议单》及必要的证明材料，和反馈的联系方式。申投诉途径可在 ICAS 发出的审核计划中获取。

Complaints can be oral or written. Complainant can dictate the handling specialist details, or provide “appeal, complaint, dispute form”, necessary certification materials and feedback contacts. The approach of appeals and complaints can be obtained in the audit plan issued by ICAS.

6.2 投诉的确认 Complaints confirmation

投诉受理专员在接到投诉后的当日，应立即向投诉者进行确认（例如电话、电子邮件等方式）。

Complaints commissioners should confirm the complaint at the day they receive the complaint (such as in phone, email, etc.).

6.3 原始投诉的评估 The assessment of original complaints

6.3.1 投诉受理专员接到投诉的当日，将投诉报市场部经理，对原始投诉进行评估，根据每项投诉的严重性、隐含的安全性、复杂性、影响力，来确认是否应对重要影响的投诉立即通报最高管理者，或根据投诉的紧迫性迅速采取行动。

Complaints commissioners should report to the marketing manager at the day they receive the complaint. They should assess the original complaints and verify whether

they should report the important complaints to the top manager according to the seriousness, potential security, complexity and influence of the complaint, or take actions immediately according to the complaint urgency.

6.3.2 投诉受理专员将所有收到的投诉登录到《客户投诉列表》，并形成原始投诉材料：包括《申诉、投诉、争议单》、投诉者所附相关证明文件等。

Complaints commissioners should register the received complaints to “Client complaint list” and form original complaint materials: including “Appeal, complaint, dispute form”, relevant proof documents provided by complainants and so on.

6.3.3 《申诉、投诉、争议单》复印件提交给品管部主管，以便其对整改过程的进度和质量进行监控。

“Appeal, complaint, dispute form” is copied to the QA department manager in order to monitor the progress and quality of the rectification.

6.4 投诉的调查 Complaints Investigation

6.4.1 投诉受理专员最迟于收到投诉的 2 天内，将投诉通知到被投诉人、协助处理投诉主管。

Complaints commissioners should inform the respondent and the complaint assistance supervisor of the complaint at latest in two days.

6.4.2 协助处理投诉的主管应遵循事实和证据的原则，迅速地对投诉进行公平、公正调查，但也必须允许被投诉人进行解释和澄清，并最迟于 5 天将调查的情况反馈到投诉受理专员。

The complaint assistance supervisor should comply with the fact and evidence, and carry out fair and impartial investigation of the complaint immediately. However, they also should allow the respondent to explain and clarify and then feedback the investigation situation to handling specialists for complaints.

6.4.3 在投诉调查期间，必要时，投诉受理专员负责就相关需再次和投诉者澄清或询问的事情进行沟通，并将投诉的进展告知投诉者。

If necessary, complaints commissioners are responsible for communicating something needed clarify or inquiry to complainant again, and they should inform complainant of the process during the investigation period.

6.4.4 对于认证客户的投诉，ICAS 应考虑投诉的情况对获证客户管理体系有效性的影响，必要时采取相应的行动，如对被投诉方进行非例行的审核等。

As for the certification clients' complaint, ICAS should consider the influence on the effectiveness of clients' management system who has already received certificate. If necessary, they should take according actions, such as non-routine audit to the

respondent and so on.

6.5 投诉的结论 Conclusion of Complaint

投诉受理专员在接到调查反馈的当日将调查相关过程和结果报市场部经理，市场部经理需联合参与调查的相关人员，根据调查的结果 2 天内对投诉作出结论。

（必要时，如影响重大的投诉等，还需上报管委会负责人或总经理，由其参与决定），结论至少需明确以下：

- （1）责任归属，及相关责任事实；
- （2）应采取的投诉处理方案；
- （3）明确的及隐含的改进项，包括个人、部门、甚至是系统上的。
- （4）下达相关人员对不符合限期纠正的通知；
- （5）如果结论表明：投诉的事实已经影响到了认证客户管理体系有效性时，ICAS 应考虑对认证证书作相应的处理，如暂停、撤销等。

Complaints commissioners should report the investigation process and results to the marketing manager at the day they receive the investigation feedback. The marketing manager should cooperate with relevant personnel, join them and make a conclusion according to the investigation result in two days. (If necessary, for example a significant complaints should be reported to the director of management committee or the general manager who should participate in the decision then), the results should at least be specified as follows:

- （1）Responsibility ownership and relevant responsibility facts;
- （2）Complaint handling schemes which should be taken;
- （3）The explicit and implicit improvement, including individuals, departments and even systems;
- （4）The notice issued the correction of incongruent deadline to relevant personnel;
- （5）If the results show that the complaint fact has already influence on the effectiveness of the certificated clients' management system, ICAS should consider a corresponding handling, such as suspension, revocation, etc..

6.6 回复投诉和通知处理意见

Handing suggestions of reply complaints and notice

6.6.1 投诉受理专员在收到结论当日回复投诉者：

（1）如果达成一致，应立即通知相关人员执行该处理方案，投诉受理专员应收集证明投诉处理方案有效执行的证据，并汇总入整个投诉材料。

（2）如果投诉者对投诉方案不满意，此投诉将继续，投诉受理专员应立即上报市场部经理，ICAS 应充分考虑客户的诉求，在条件允许的情况下，尽可能调整投诉处理方案以达成共识，并应同时明确告知客户如仍不满意可继续选择内部和外部的投诉渠道。

A、 ICAS 内部投诉渠道

- ◆ 最高管理者
- ◆ 管委会负责人
- ◆ 顾委会负责人

B、 ICAS 外部投诉渠道

- ◆ 国家认监委 认可品管部
- ◆ 国家认可委

投诉者需要时，以上各渠道的联系方式由投诉受理专员提供

Complaints commissioners should reply the complainant at the day they receive the complaint results.

(1) If they come to an agreement, the commissioners should inform relevant personnel to carry out this scheme. They should collect the effective evidence to the complaint and then gather into the whole complaint data.

(2) If the complainant is dissatisfied with the complaint scheme, this complaint shall be continual, and the commissioners should report immediately to the marketing manager. In order to come to an agreement, ICAS should consider the client's appeals fully and try to adjust the complaint scheme under the permitting conditions. At the same time, ICAS should also clearly inform the clients that they can continually choose internal or external complaint channel if they are still dissatisfied:

A、 ICAS internal complaint channel:

- ◆ The top management
- ◆ The director of the management committee
- ◆ The director of the consultative committee

B、 ICAS external complaint channel:

- ◆ CNCA accreditation QA department
- ◆ CNAS(China National Accreditation Service for Conformity Assessment)

The contacts above can be provided by the complaint commissioners, if necessary.

6.6.2 投诉受理专员于收到结论的当日将结论中所涉及的整改项通知相关人员（如被投诉人、相关主管等），并传达限期纠正的通知。

The complaint commissioners should inform the relevant personnel (such as the respondent, relevant manager and so on) of rectification items related to the result at the day they receive the result.

6.7 结束投诉 End of complaints

投诉受理专员应至少确认以下事情后，方可结束某项投诉：

- (1) 投诉者对投诉处理的过程和投诉处理方案实施的结果已经满意。
- (2) 所有改进项，均已提交了有效的纠正和预防措施，并经管代确认纠正有效。
- (3) 处理投诉的相关过程得到了充分的记录、与投诉有关的材料和证据（如投诉人提供的证明材料、调查中收集的证明材料、投诉处理方案有效执行的证据、纠正预防措施、培训记录等）进行了完整的保留，可供追溯、抽查及验证。
- (4) 与投诉有关材料报备一份给管代。

一般情况下，投诉的整个处理过程不宜超过 20 个工作日。

The complaint only can be finished until at least the complaint commissioners ascertain these as follows:

- (1) The complainant has been satisfied with the complaint handling process and the result of the complaint handling scheme.
- (2) All improvements have been submitted effectively corrective and preventive actions and confirmed by the management representative.
- (3) All the processes related to complaints have been recorded fully, all the materials and evidence (such as certification materials from complainants and investigations, evidence of the effective implementation to the complaint schemes, corrective and preventive actions, training records, etc.) have been kept completely and can be traced, random checked and verified.
- (4) Materials related to complaints should be copied and submitted to the management representative.

Generally, the whole complaint handling process should not exceed 20 workdays.

6.8 维护和改善 Maintenance and improvement

6.8.1 对处理投诉过程的监督 Supervision of the complaint handling process

品管部按本程序要求对投诉处理过程进行监控，如投诉处理的及时性、记录的完整可追溯性、纠正措施是否有效实施、必要的培训是否完成等。

QA department should monitor the complaint handling process according to the requirement of this procedure, such as the timeliness of complaint handling, the integrity and traceability of records, the effective implementation of correction, the necessary training finished whether or not, etc..

6.8.2 持续改进 Continual improvement

(1) 管代应对所有的投诉进行分类，以确定此投诉是反复还是偶发问题，消除任何导致投诉发生的现存和潜在的原因。

(2) 通过实施有效的纠正和预防措施，防止投诉的反复发生。

(3) 将各项投诉作为下次内审的输入，以便重点关注。

(4) 定期评估该程序，以确保其有效性及高效性地持续改进。

(1) The management representative should classify all the complaints, in order to ensure whether these complaints are repetitive or occasional, and to eliminate the existing and potential reasons that might lead to the occurrence of complaints.

(2) Carry out effective corrective and preventive actions to prevent the repeating occurrence of complaints.

(3) All the complaints should be focuses as inputs for the next internal audit.

(4) Regularly assess this procedure to ensure the effectiveness of continual improvement.

6.8.3 投诉的报告制度 Reporting system of complaints

投诉受理专员应将所有投诉的处理情况，定期汇报总经理：

(1) 对于评估为重大影响的投诉，收到投诉的第一时间立即上报，并及时汇报进展情况；

(2) 其他投诉，采用月报的方式上报。

The complaint commissioners should report all the complaints handling situation to the general manager regularly:

(1) As for significant complaints, the commissioners should report to the general manager the first time and report the progress timely.

(2) Other complaints should be reported by the commissioners monthly.

6.9 公正性和保密 Impartiality and confidentiality

(1) 处理投诉应遵循公平、公正、公开、合理的原则

(2) 对于投诉者来说整个处理投诉的过程是免费的。

(3) 与投诉有直接关系的人员，应回避该项投诉的处理工作，投诉的决定应由投诉事项无关的人员做出，或经其审查和批准。

(4) 为了确保投诉人私人信息保密性，参与处理投诉的人员对其所涉及到的任何与投诉有关的非公开情况负有保密责任。除非得到消费者或投诉人的同意，否则其个人信息只有在机构进行处理投诉时才能使用。ICAS 应与客户及投诉人共同决定是否应将投诉事项公开，并在决定公开时，共同确定公开的程度。

(1) Handling complaints should follow a fair, public and reasonable principle.

(2) The entire process of the complaint is free for complainants.

(3) Personnel related directly to the complaint should avoid the handling work. The complaint decision should be made by personnel irrelevant to the complaint, or be examined and approved.

(4) To ensure the confidentiality of the complainants' personal information, all personnel participating in the complaint should take responsibility for the confidentiality of non-public information related to the complaint. The personal information can be only available when handling the complaint. Otherwise, they are approved by clients or complainants. ICAS should codetermine with clients and complainants whether the complaints should be disclosed and decide the openness jointly at the time of open.

7.0 争议 Dispute

7.1 对于在认证过程中(自认证申请受理至认证证书颁发/维持/变更/暂停/撤销前),就本机构认证人员的现场审核行为、审核发现、审核结论、认证进度安排等具体认证环节持有不同意见的 ICAS 的客户,可以向 ICAS 提出争议处理,提出争议的途径可在 ICAS 发出的审核计划中获取,也可直接向 ICAS 注册部负责人提出。

For client of ICAS who hold different opinions on specific certification processes such as on-site audit behavior, audit findings, audit conclusions, and certification progress arrangements of our certification personnel during the certification process (from the acceptance of the certification application to the issuance/maintenance/change/suspension/revocation of the certification certificate), they can raise disputes with ICAS. The approach for raising disputes can be obtained from the audit plan issued by ICAS or directly raised to the head of the ICAS registration department.

7.2 审核现场发生争议时,审核组长应尽可能依据审核准则、审核引用文件协商处

申诉、投诉、争议处理程序

理。对经协商仍不能取得一致意见的，审核组长有权先行决定，并记录争议双方的所有意见。客户可以根据本程序向 ICAS 提出申诉。

The audit group leader should try to handle it through consultation according to audit principles and audit references, when the dispute occurs in the on-site audit. As for the disagreements, the audit group leader is entitled to decide in advance and record two sides' opinions. The clients can propose the appeal to the managing director of ICAS according to this procedure.

7.3 不在审核现场提出的争议，应以书面形式向 ICAS 注册部提出。涉及审核的争议，注册部交审核经理，由审核经理负责组织相关人员研究，审核部经理应将研究结果通知争议提出人；涉及认证决定环节的争议，由注册部经理组织相关的人员研究，并将研究结果通知争议提出人。争议提出人对处理结果仍不满意的话，可以依据本程序向 ICAS 提出申诉。

The off-site audit dispute should be proposed to ICAS registry in written. If the dispute involves audit, the registry should hand over it to the audit manager. The audit manager is in charge of organizing related personnel to research and inform the controversial participant of the results. The disputes involving the certification decision-making process, the registry manager is in charge of organizing related personnel to research and inform the controversial participant of the results. If the controversial participant is still dissatisfied with the handling results, he/she can propose the appeal to ICAS.

8 记录 Records

申诉、投诉、争议处理单 (MFP0622)

Appeal, Complaint, Dispute Handling Form (MFP0622)

9 引用文件 Reference documents

CNAS-CC01

CNAS-CC02

ISO1002:2014

CNCA-N-007:2021

CNCA-N-001:2021