



Policy and Procedures On Managing Complaints and Appeals (MP04_v1.2)

Document Name : Policy and Procedures on managing Complaints and Appeals (MP04_v1.2)
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Review Date : 2021/01/19
Version : Final v1.2

Table of contents

1. Executive Summary	3
2. Policy Statement on Complaints and Appeals	3
2.1 Complaints	3
2.2 Appeals	3
3. Customer Complaints and Appeals touch points.....	4
4. High level process flow of managing Complaints and Appeals.....	5
5. Complaints and Appeals Management Procedure.....	5
5.1 Register a Complaint (Complainant)	5
5.2 Escalating the complaint (PRA staff member)	6
5.3 Feedback report (Director responsible for investigating the complaint).....	6
6 Measurement Control	7
7. Records keeping	7
Appendix I: Document register.....	8
Appendix II: Definitions	9

1. Executive Summary

The purpose of this document is to outline the procedure to be followed by all members of PRA when receiving, addressing and reporting complaints and appeals received from clients or any third party either from internally or externally. This document is intended to provide any person, involved in the complaint or appeal process with the procedure to follow in resolving the complaint or appeal. This document can also be used as a procedure to follow by any party when reporting, making a follow up or enquiring on a complaint or a dispute.

2. Policy Statement on Complaints and Appeals

PRA takes full responsibility of all decisions made regarding the BEE verification. Therefore all clients who wish to appeal against the decisions or final BEE status obtained from PRA are to direct all these appeals to PRA and PRA does not outsource any of these actions and decisions. Clients can appeal against the output or results of the BEE verification process provided by PRA. PRA acknowledges that the client might not necessarily be satisfied with the outcome or response provided after investigation, however PRA commit to open, fair and transparent process to ensure the client is aware of the process and the obligations of both PRA and the client. PRA understands the importance of having a credible complaints and appeals process to ensure that markets, clients and regulatory bodies have confidence in the outcome of the verification process by BEE verification agencies.

2.1 Complaints

Definition:

Clients can log a complaint(s) at any time during the BEE verification process by PRA. PRA undertake to investigate all complaints received from all parties and provide the complainant with feedback on the complaint received. Complaints can be received from external parties or from internal parties. PRA ensures that no complainant will be prejudiced or subjected to unfair treatment as a result of logging a complaint with PRA. All complainants are treated in a fair and just manner. The board of directors, being the highest body of authority, are responsible for investing all complaints received and ensuring that a solution is provided to the complainant. The CEO as the member of the board is accountable to the complainant and the client.

2.2 Appeals

Definition:

Appeals are logged by clients against the results received from PRA. If a client is not happy with the output or their BEE status after the verification process by PRA, they can log an appeal in dispute of the output. All appeals are handled in a professional manner and complainants are provided constant feedback until the appeal process is completed. The principles of fairness, openness and confidentiality are just some of the values that PRA upholds when handling appeals.

When sending the B-BBEE certificate to the client, a link is also sent where customers can follow the link to complete their customer survey questionnaire. The outcome of the customer survey are automatically collated and updated to the PRA Database where the CEO will Log in and retrieve the response and allocate to the relevant staff for escalation.

3. Customer Complaints and Appeals touch points

The following are the identifiable areas of customer first point of contact when logging a complaint or an appeal with PRA;

- Telephone contact to any member of PRA staff or management
- Email communication to any member of PRA staff or management
- Walk in clients who wishes to log a dispute or complaint
- Fax communication to PRA.
- 3rd party complaint about PRA services or conduct such as complaints received via the DTI, SANAS, ABP, media, etc.
- Professional bodies or individuals engaging in investigations of a particular verification.

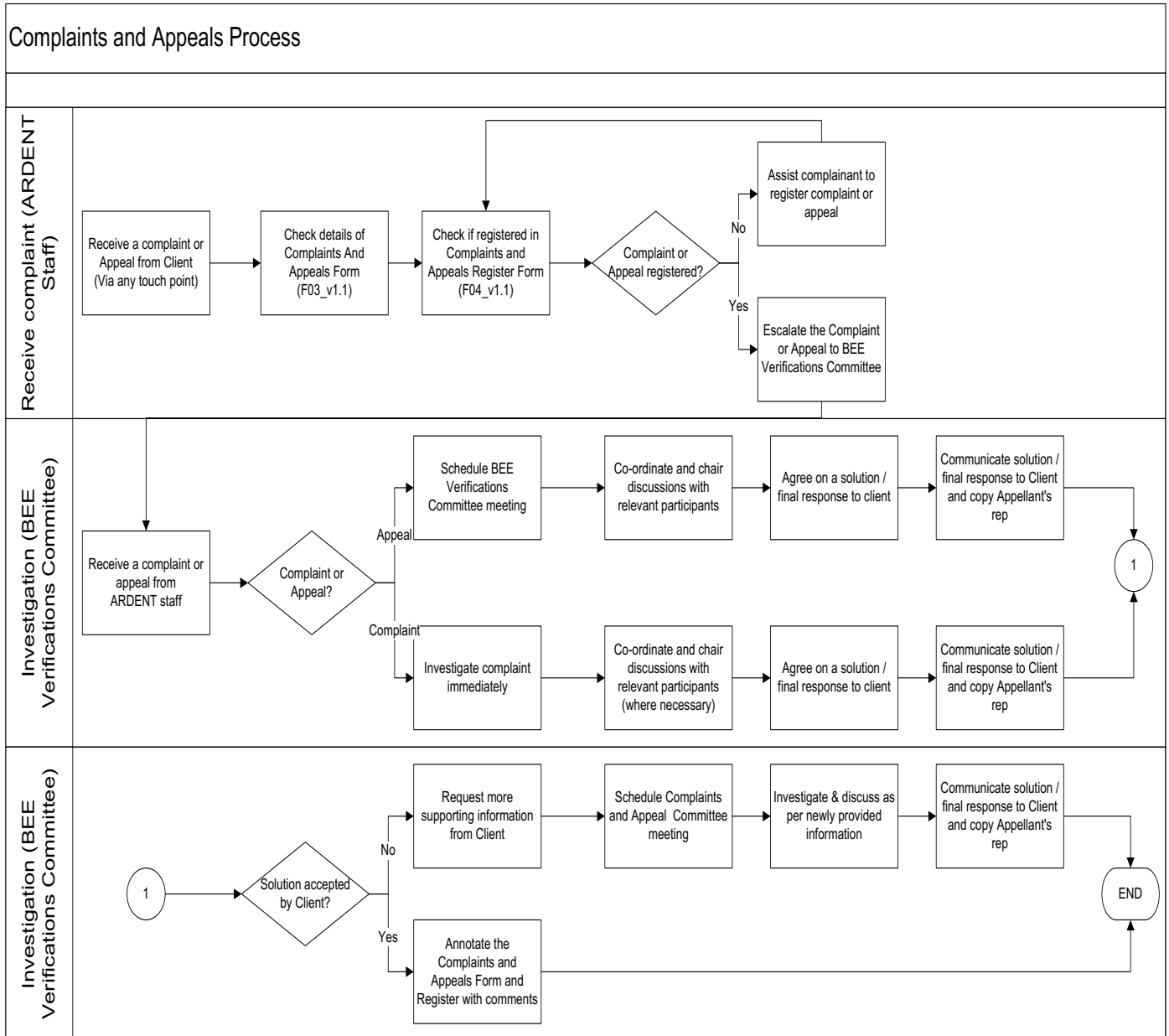
All complaints received by PRA are forwarded to any one of the directors who will explain the process of logging a complaint to the customer. All complaints received telephonically, email, fax or via the internet are deemed enquiries before they are confirmed to be valid complaints. Once the enquiry is received, a **Complaints Form F03** is sent to the complainant / client who is requested to complete the details of the form and send back to PRA to the attention of the Director, as per initial process discussions. Only signed complaints forms are then logged as valid complaints in the **Complaints Register Form F04**.

All complaints received by PRA are forwarded to the appropriate director, (as annotated on the **Complaints Form (F03)**), who will ensure that the complaint is investigated and the client is provided with appropriate feedback as per process highlighted below in section 4.

PRA investigates all valid complaints and appeals received by clients and endeavours to uphold the principles of fairness, openness, impartiality and independence as expected by clients, industry, association bodies as well as regulatory bodies. As a result only an independent, (of the verification process), director will be responsible for investigating complaints or appeals received by PRA to ensure impartiality is maintained at all levels.

4. High level process flow of managing Complaints and Appeals

Figure 1: High level process flow for managing Complaints and Appeals



5. Complaints and Appeals Management Procedure

5.1 Register a Complaint (Complainant)

- I. Complete the **Complaints Form (F03)**
- II. Submit the completed **Complaints Form (F03)** to PRA, for the attention of the Director, and specify the director's name

- III. Ensure the complaint is registered in the **Complaints Register Form (F04)**
- IV. Obtain a complaint reference number from PRA representative
- V. Obtain expected time frames for a response from PRA representative

5.2 Escalating the complaint (PRA staff member)

- I. On receipt of complaint, ensure the complaint is formally registered in the **Complaints Form (F03)** and the form is properly completed and signed by the complainant
- II. Escalate (via email) the complaint to the director indicated in the complaints form as PRA representative within 24 hours of receipt of the complaint
- III. Obtain proof of acknowledgement of receipt from the director responsible for investigating the complaint.
- IV. Advise the complainant of the process and expected timeframes of responses going forward
- V. Advise the complainant of the progress or feedback to be received directly from the director on a weekly basis

5.3 Feedback report (Director responsible for investigating the complaint)

- I. Start investigating the complaint within 24 hours of receipt of the complaint
- II. Depending on the nature of the complaint, request for supporting information by verifying the client file data and conducting interviews with parties involved with the verification process
- III. Report any responses or feedback to the complainant and copy the complainant's representative (PRA staff), where applicable
- IV. Request formal acknowledgement of receipt of the complaint resolution and if response acceptable
- V. If not acceptable, trigger escalation procedure (step 3.2 above) based on the newly supplied information by the client
- VI. If acceptable close complaint and record as such on the **Complaints Register Form (F04)** and communicate the details of the complaint and the outcome to the rest of the staff members during the knowledge sharing workshops to ensure similar misconducts are not repeated or to ensure positive feedback is continually practiced
- VII. Staff members who were part of the verification in this appeal can not be members of the complaints investigating team to ensure impartiality, however they can be requested to provide input into the investigation process
- VIII. If an appeal is received, it is to be escalated to the board of directors via email communication
- IX. The board of directors will determine who was part of the verification process and will exclude the party from the investigation process
- X. The appeal will be allocated to any one member of the board who is independent from the verification process on a rotation basis
- XI. The independent board member will investigate the appeal and provide feedback to the complainant as well as to the rest of the board members within 24 hours of receipt of the appeal
- XII. Communicate the final response to the client and copy the applicant's representative (PRA staff)
- XIII. Confirm if solution is satisfactory or accepted by the complainant or appellant
- XIV. If not accepted, request reasons or further information required to continue with the investigation

- XV. When further or new supporting information is received, start with the investigation within 24 hours of receipt of the new information
- XVI. Investigate or delegate the investigation to any independent member of PRA.
- XVII. Discuss and agree on a solution or response to the Client
- XVIII. Communicate the solution or response to the client**
- XIX. Confirm if solution or response is acceptable**
- XX. Annotate solution or response in the complaints and appeals form and close the investigation

6 Measurement Control

The CEO as the accountable person is required to ensure all complaints and appeals are investigated fairly with confidentiality to the satisfactory level of the client. The CEO is also required to communicate to the staff member(s) responsible for the verification and to all PRA staff members, the outcome and the consequences suffered by PRA as a result of the complaint received. This is to ensure training, awareness and education by all PRA staff members, which will result in prevention of similar complaints or appeals in future and improved quality service to PRA clients. Internal auditors are responsible for reporting on any irregularities found, relating to how complaints and appeals are handled by PRA, while conducting internal audits.

7. Records keeping

Throughout the process of receiving, investigating and discussing complaints, records or documents and forms are used.

Forms: All forms, Complaints and Appeals Register Forms are filed and managed by the managing director. The forms are kept at the administrator's office and are available to all PRA staff members for viewing and for logging in new complaints or appeals. The managing director reviews these forms on a weekly basis to ensure all issues are being addressed. Forms are kept for a period of 2 years before being archived for a further period of 5 years.

Supporting documents: The supporting documents, and completed Complaints and Appeals Forms used in the complaints or appeal process in support of the verification process are stored in the client's verification files and are kept confidential in a lockable storage area. These documents form part of the verification process and are kept for a period of 2 years. After this period the client's files are archived for another period of 5 years.

Appendix I: Document register

Document History

Version	Changes	Date	Changes By
Final v1.0	Original Document issued	2019/05/06	CEO
Final v1.1	Amended Logo & headers	2019/09/20	CEO
Final v1.2	Amended Logo & headers	2021/01/19	CEO

Document Distribution

Latest Version	Distribution channel/s	Distribution Date	Distributed By	Old Copy Recalled By
Final v1.2	• PRA File (hard copy)	2021/01/19	CEO	CEO
	• Server file copy	2021/01/19	CEO	CEO
	• Internet file copy	N/A	N/A	N/A

Appendix II: Definitions

ABVA	: Association of BEE Professionals
BEE Act	: Broad-Based Economic Empowerment Act of No.53 of 2003
ED	: Enterprise Development
EE	: Employment Equity
EO	: Equity Ownership
Evaluation	: to assess, verify and validate the BEE status of entities
HR	: Human Resources
Impartiality	: Evidence of being independent, unbiased, objective and free of any influence in all activities conducted by PRA
MC	: Management Control
Measured Entity	:The company being assessed for BEE status by a verification agency
PP	: Preferential Procurement
PRA	: PraBEE (Pty) Ltd
Related parties	: means a party that is linked to the Verification Agency by common ownership or directors, contractual arrangement, common elements in the name, informal understanding or the means such that the related party has a vested interest in the outcome of a verification or has a potential ability to influence the outcome of an verification.
Sampling	: The application of verification procedures to less than 100% of items within an account balance or class of transactions such that all sampling units have a chance of selection. This will enable the verification agency to obtain and evaluate verification evidence about some characteristic of the items selected in order to form or assist in forming a conclusion concerning the population from which the sample is drawn
SANAS	: South African National Accreditation System
SANAS R47	: Accreditation of BEE Verification Agencies document.
SD	: Skills Development
SED	: Socio-Economic Development
The Codes	: Codes of Good Practice issued in terms of Section 9 of the Act.
The DTI	: The Department of Trade and Industry
Verification agency	: BEE Verification Agency accredited in terms of Statement 020
Verification report	: Report issued by the Verification Agency which provides the detailed score of each element reflected in the Verification Certificate and B-BBEE Status awarded to the measured entity.
Verification standards	: means the minimum standard required from Verification Agencies to be accredited and the standard gazetted by the Minister from time to time.