

Document Ref No: P012 – Complaints & Grievance Procedure			Total Number of Pages: 08		
Rev No	Date	Revision	Originator	Approved by	Controlled by
01	25/05/2023	Text	OM	COO	DC



Complaints & Grievance Policy and Procedure

## Introduction

Sangfroid Group (SFG) views complaints as an opportunity to learn, review internal processes and make adjustments and improvements as well as providing the chance to put things right for the person/organization from which the complaint was received.

SFG's policy is;

- To provide a complaints procedure that is fair
- To provide a complaints procedure that is easy for anyone wishing to make a complaint to use
- To make everyone at SFG knows what to do should a complaint be received
- To ensure all complaints are investigated in a fair and timely manner
- To ensure that all complaints are, where possible, resolved and actions completed to repair relationships
- To implement, where applicable, preventative actions to prevent reoccurrence of complaints
- To protect complainants from retribution

A complaint may come from any organization or individual that has a legitimate interest in SFG and may include clients, partners, prospects, our supply chain or members of the public.

The complaint may be received verbally by phone, by email, web form or in writing. For the purpose of this policy "Customer Services" refers to the SFG staff who deal with customers (as opposed to a company department).

This policy does not cover complaints from staff who should use SFG's Discipline Policy.

All complaint information will be handled sensitively, with only those involved being kept informed, all data protection requirements will be followed.

All complainants will be dealt with in a respectful manner and should not be concerned with regards to any consequences of making a complaint. SFG will not disadvantage the complainant in any way or withdraw services due to the receipt of a complaint.

We will continually review this policy to ensure it reflects the needs of our business.

## Purpose

Details the standards to be applied when internally reacting to a complaint from a current or potential customer or client; reporting the complaint and the preliminary steps towards full investigation and resolution where appropriate.

Gives clear step instructions of how to capture relevant complaint information & where to record the process.

Reporting ALL complaints when they occur is necessary for several reasons:

- To enable corrective action to be taken to help prevent similar future occurrences.
- To identify any common trends & to measure performance.
- To ensure that SFG reputational and strategic risks associated with the delivery of poor product or services are mitigated.

## Scope

The scope statement should define:

- The topic covered by the procedure
- The activities and, where applicable, the areas to which the procedure applies
- Any specific exclusion with, if possible, a reference to the document which covers each exclusion

These procedures apply to:

- All business units within SFG & its subsidiary companies;
- All information, notification or complaints relating to potential poor service standards.
- All locations within which the Group operates – including all UK & overseas operational centres (offices, patrol boats, etc.) & all vessels

‘Complaints’ as defined in 3.2, below normally have the following distinct stages:

1.	Occurrence through verbal or written communication from the complainant.		
2.	Response		
3.	Reporting		
4.	Recording		
5.	Investigation		
6.	Planning corrective action(s)		
7.	Execution of corrective action(s)		
8.	Closure (may or may not be after all corrective actions have been completed) These Procedures deal with Stages 3 & 4, & is divided into TWO distinct parts:		
	<b>Part I</b>	<b>Receiving a complaint</b>	Written or Verbally reported by the client or customer.
	<b>Part II</b>	<b>Recording the incident: facts, business unit circumstances, people involved, current status.</b>	Recorded by the Customer Services Team. Distributed to the Relevant Director to take forward and assign a Resolution team to investigate and identify corrective action.

## Definitions

Abbreviations used:

- **CRM** – Customer Relationship Management Tool
- **Salesforce** – SFGs CRM (superseded by spreadsheet recording)
- **SLA** – Service Level Agreement

<b>A Complaint</b>	An issue that has, or could have, resulted in poor delivery of service, and also affect a customer or clients expectations of SFG services
<b>Reporter</b>	Person that receives the complaint and reports this to the Customer Services team

<b>Recorder</b>	Customer Services team member that will record all details of the complaint on the CRM system
<b>Resolution Team</b>	Team that will investigate the Complaint, identify reasons it occurred and what can be put in place to prevent reoccurrence of the issue

## Related Documentation/ Standards / Legal References

This Procedure ensures compliance with:

- SFG internal complaints process flowchart
- ISO 9001:2008 Quality Management Process and performance review

## Responsibilities

### Directors

Responsible for ensuring their teams are familiar with and follow the Complaints Procedure. The Director will be responsible for assigning relevant team members to the Resolution Team, this should include at least one member of staff, and once Corrective Actions have been agreed by this team the Director will ensure these are implemented.

### Sales/Commercial Director

In the case of a customer complaint, the Sales/Commercial Director is responsible for ensuring the complaint is recorded in line with the Complaints Procedure, working with the Resolution Team to agree Corrective Action and ensure the complainant receives a satisfactory response. Sales/Commercial Director will also complete quarterly reviews of all complaints received to identify trends or common themes, review average time from the logging of the complaint to closure, average number of complaints per month and complete a status check of any open complaints.

### Customer services

Customer Services are responsible for recording all complaints on the CRM system in line with the Complaints Procedure and that once recorded, details are passed to the Director and Sales /CommercialDirector if they are not already aware. Customer Services will monitor the Complaint through the process to ensure a resolution is reached and should be part of the Resolution Team.

### Resolution team

This is a team allocated on a case by case basis and called the Resolution Team: they are responsible for investigating the causes of the complaint and identifying the reasons the issue may have arisen. After causes have been identified the resolution team should also discuss steps that can be taken and actions that need to be introduced to prevent reoccurrence of the same complaint.

### All Employees

All Employees have a responsibility for reading the Complaints Procedure and ensuring they follow the steps within this document when dealing with Customer Complaints or issues.

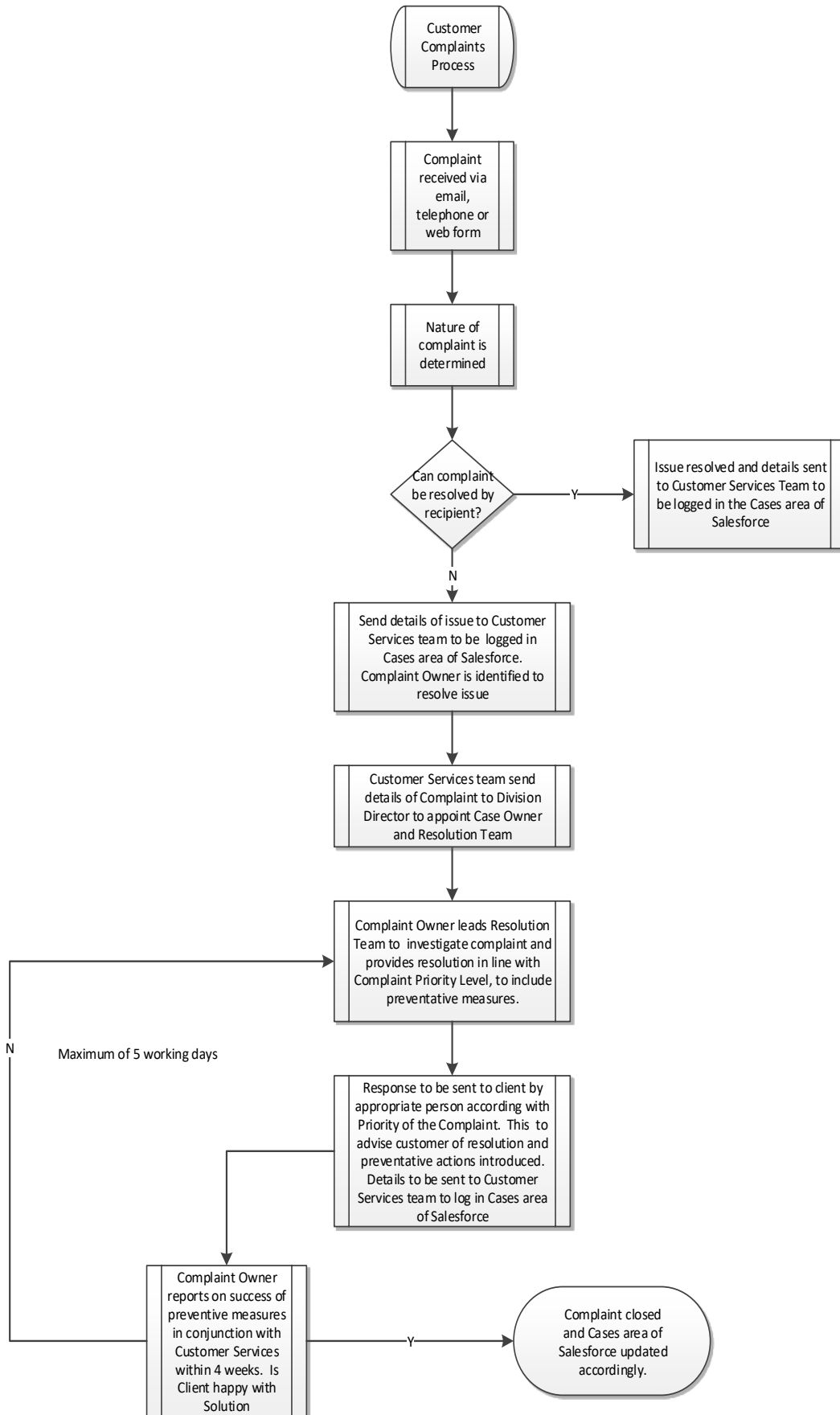
# Complaint Reporting Method

## What needs to be reported?

When considering whether or not an complaint or potential complaint needs to be reported the key question (even if there has been no factors identified) is, “Could it have resulted in poor delivery of service, and also affect a customer or clients expectations of SFG services?”

The following briefly summarises what to do in the case of different types of complaint or issue:

<b>Severity 5 Catastrophic</b>	Requires immediate attention: investigation and a response to the client should be issued at the earliest opportunity. Senior Management are likely to be involved. Full investigation will be required, so all details of steps taken leading up to the complaint/issue will be needed. Response to Client should be made by a Director or Senior Manager.
<b>Severity 4 Critical</b>	
<b>Severity 3 Manageable</b>	Requires response within 3 working days. Full investigation will still be required, with full details of the complaint/issue available. Response to the client should be provided by a Director or Client Account Manager.
<b>Severity 2 Marginal</b>	Requires response within 1 working week. Details of the complaint/issue and steps leading up to this will be important but unlikely to involve multiple parties or divisions. Response to client may be provided by the Reporter of the complaint, Customer Services or Client Account Manager.
<b>Severity 1 Negligible</b>	



## How to report a notified complaint

Report it immediately to a Director who will arrange to have the complaint entered into the relevant details on the **CRM** System.

If appropriate an acknowledgement of the complaint should be sent to the client, if emailed this should be logged onto the CRM system.

The Customer Services person will ensure all details of the complaint/issue are captured and entered onto the CRM system to provide a full picture of events leading up to the complaint. The Customer Service person will send details of the Complaint/Issue to the Director and Sales/Commercial Director, the Director will then assign a Resolution Team headed by the Complaint Owner to investigate the Complaint.

The information gathered relating to the Complaint will be reviewed to identify common trends or issues and therefore should be completed as accurately as possible.

- Date Case Received – The Date the Complaint was received or that the Issue arose.
- Contact Name – Name of Person making complaint
- Account Name – Name of Company that the Complaint is connected to
- Case Owner – Name of person in SFG responsible for investigating and resolving complaint
- Customer Services Owner – Name of Customer Services person that will ensure Complaint is followed up
- Date of Acknowledgement – Date that response sent to client to acknowledge their Complaint
- Case Origin – method by which Complaint was received; email, phone or web
- Status – Stage of Complaint
- Priority – Is this Complaint of Low, Medium or High priority
- Nature of Complaint – Explain what the Complaint is regarding and the steps leading up to this
- Action Taken – Explain what actions have taken place following the receipt of the Complaint, has the client been contacted, what information has been provided to them?
- Preventative Actions Introduced – What actions have been put in place to avoid reoccurrence of the Issue raised.
- Date of Substantive Reply – The date that the client has been provided with a full response to their Complaint. Emailed responses should be logged onto the CRM system.
- Outcome of Follow up report – What was the outcome of follow up contact with the Client following the Substantive response
- Date of Follow up – Date that follow up contact with the Client was made

All complaints should be acknowledged within 24 hours of receipt and followed up within 4 working weeks to check whether any further issues have arisen and that the client is complainant is happy with the solutions and preventative actions introduced. Once this has been completed and it is confirmed that the client is satisfied and no further actions are required against the Complaint it can be closed on the CRM.

Status – Set to Closed

- Date Case Received – The Date the Complaint was received or that the Issue arose.
- Date Case Closed – The Date that it is confirmed the client is happy with solution to their complaint and no further actions are required.
- Case Owner - Name of person in SFG responsible for investigating and resolving complaint

- Customer Services Owner - Name of Customer Services team member that will ensure Complaint is followed up
- Case Summary – Summary of the Complaint/Issue, the steps taken to resolve this, preventative actions introduced and communications with client regarding this.

## Complaint Reporting/Reviewing

The Sales/Commercial Director will complete a quarterly review of all complaints recorded on the CRM system. The complaints review will then feed into the management review.

The review will include;

- Common complaint areas
- Average time from logging to Closure of Complaint
- Average number of Complaints per month
- Review of all Open Complaints to ensure appropriate action is being taken

Customer Services provide information on live cases and complaint resolutions to the senior management team during weekly communications. If the complaint is more serious then senior management will be made aware of the issue at the time of complaint.

The Internal Audit function is used to review the reporting and resolution function.

## Protection from Retribution

All complainants should be protected from retribution and should not be concerned that their making a complaint will have negative consequences for them.

The Sales/Commercial Director will be made aware of all complaints by Customer Services at the time these are recorded and will be ultimately responsible for ensuring all complaints are followed up and handled in line with the Complaints Policy, this includes ensuring that all complainants are dealt with in a respectful manner and do not receive negative communications or comments from SFG.

The Resolution Team will include either the Sales Director or at least one member of the Customer Services team who report to Sales Director and will therefore feedback on progress the Resolution Team has made and any communications with the Complainant.

All communications with the complainant should be logged onto the CRM system and the Sales Director has access to view all of these and ensure that communications with the Complainant remain neutral and respectful.

The complainant will not be disadvantaged by SFG following a complaint, nor will services be withdrawn by SFG, unless specifically requested by the complainant. The Sales Director will monitor the progress of the Complaint and ensure that actions taken are in line with the Complaints Policy and do not have an impact on the provision of service to or with the Complainant.

Actions taken will also be monitored as part of the reporting / review process.





Harry Hayes  
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1<sup>st</sup> May 2023