

## Provision for Handling of Complaints

### 1. Objective

This document specifies the provisions for the Japan Food Safety Management Association (hereinafter referred to as "JFSM") to respond to complaints regarding the business operations of the JFSM in a fair, transparent, and objective manner.

### 2. Definition

#### (1) Complaints

A complaint is an expression of dissatisfaction, other than appeals, made to the JFSM by an individual or organization against the activities of the JFSM and related organizations such as accreditation bodies, certification bodies, organizations, assessment companies, training organizations, etc., to which the individual or organization expects a response.

Appeals related to the operation of the JFS-C certification program shall be handled in accordance with the "JFSM\_C01P08 Provision for Handling of Appeals Concerning the JFS-C Certification Program", and appeals related to the JFS Audit and Conformity Assessment Program shall be handled in accordance with the "JFSM\_A01P01 Provision for Handling of Appeals Concerning the JFS Audit and Conformity Assessment Program" (hereinafter collectively referred to as "Provision for Handling of Appeals").

#### (2) Executive meeting

Executive meeting refers to consultations by a consultative body consisting of the president, secretary general, and each group leader of the JFSM.

### 3. Responsibilities

(1) The President shall have the following responsibilities to :

- 1) make decisions on the acceptance of complaints;
- 2) make decisions on the policy in response to complaints; and
- 3) check whether or not the response of any accreditation bodies, certification bodies and/or organizations, assessment companies and/or organizations, and training organizations are appropriate.

(2) The Secretary-General shall have the responsibilities to:

- 1) act as a secretariat function for the Executive meeting;
- 2) ensure corrective actions derived from complaints;
- 3) report to the Board of Directors on the status of progress in responding to complaints received, the policy for responding to complaints and the results of the completed response, and whether or not there are any objections to the results of these responses; and
- 4) report on the existence of complaints to the annual management review meeting of the association.

## **4. Application**

### **4.1 Contact for and Receipt of Complaints**

JFSM shall receive the complaints filed using **the Complaint Statement (Form 1** hereto attached) or by any means by which the details of the complaint are clear (including e-mail and other electromagnetic methods). JFSM, shall in principle, receive no oral statements of complaint.

### **4.2 Acceptance of Complaints**

(1) The President shall decide to accept as a complaint those cases that fall under 2 (1), after deliberation by the Executive meeting.

However, a complaint that falls under any of the following cases shall not be accepted

- 1) A complaint that can be judged to be outside the scope of responsibility or authority of JFSM
  - 2) Cases in which the name and contact information of the complainant cannot be specified
  - 3) The complaint is related to court proceedings such as civil lawsuits, civil arbitration, etc.
  - 4) Cases in which it is clear that the complaint is the same as a complaint that has already been received by JFSM (however, even if the complaint is about the same event, it excludes cases in which the complaint is about a different matter or for a different reason, or in which there has been a change in circumstances such as the submission of new facts).
- (2) The Secretary-General shall select the Secretariat personnel for any complaints whose acceptance is decided (hereinafter referred to as the "the appointed personnel") from among the JFSM personnel who do not directly engage in the business concerned with the complaint.
- (3) As soon as the acceptance is decided, the appointed personnel shall provide a notice of acceptance to the filing party in writing.
- (4) After a decision on acceptance made, the steps prescribed in 4.4 shall apply to complaints.

### **4.3 Non-Acceptance**

The following provides for the steps that shall be implemented after a decision of non-acceptance made.

- (1) As soon as the non-acceptance of a complaint is decided, the General Affairs Department of the Secretariat shall provide a notice of non-acceptance and the reason for the non-acceptance to the party filing it in writing. The notice of non-acceptance shall clearly state the procedure for appealing the decision of non-acceptance.
- (2) If the filing party is dissatisfied with the decision of non-acceptance, it may file an appeal against it to JFSM no later than fourteen (14) days after the receipt of the notice of non-acceptance mentioned 4. 3 (1).

### **4.4 Handling of Complaints**

The appointed personnel shall respond to complaints according to the following procedures.

- (1) Complaints about accreditation bodies or certification bodies
  - 1) The appointed personnel shall ask the accreditation bodies or the certification bodies concerned to carry out an investigation and response concerning the complaint and to report their results to JFSM.
  - 2) Executive meeting shall discuss whether or not the response of the accreditation bodies or the certification bodies is appropriate.
  - 3) If the President deems it necessary to investigate the accreditation bodies or the certification bodies as a result of Executive meeting, JFSM shall directly visit the accreditation bodies or the certification bodies to carry out an investigation.
  - 4) If the President deems the accreditation activities of the accreditation bodies or the certifying activities of the certification bodies questionable as a result of the visiting investigation and deliberations at Executive meeting, it shall make a written request to the bodies concerned for correction.
- (2) Complaints about assessment companies or training organizations
  - 1) The appointed personnel shall ask the assessment companies or the training organizations concerned to carry out an investigation and response concerning the complaint and to report their results to JFSM.
  - 2) Executive meeting shall discuss whether or not the response of the assessment companies or the training organizations is appropriate.
  - 3) If the President deems it necessary to investigate the assessment companies or the training organizations as a result of Executive meeting, JFSM shall directly visit the assessment companies or the training organizations to carry out an investigation.
  - 4) If the President deems the activities of the assessment companies or the activities of the training organizations questionable as a result of the visiting investigation and deliberations at Executive meeting, it shall make a written request to the bodies concerned for correction.
- (3) Complaints about the activities of JFSM
  - 1) The appointed personnel shall investigate and confirm the facts related to the complaints.

These investigations and confirmations shall be conducted by interviewing the person concerned or meeting with the filing party at an appropriate time.
  - 2) The appointed personnel shall draft a policy for response to the complaint on the basis of the investigation and verification results.
  - 3) After deliberation at Executive meeting, the President shall consider the draft response policy to determine the response policy.
  - 4) The appointed personnel shall handle the complaint in accordance with the response policy.
  - 5) If necessary or upon request from the filing party, the appointed personnel shall report the progress of the complaint handling process to the filing party in writing.

(4) Complaints Other Than Those Mentioned in 4. 4 (1), (2), and (3)

- 1) The appointed personnel shall investigate and confirm the facts related to the complaints.

These investigations and confirmations shall be conducted by interviewing the person concerned or meeting with the filing party at an appropriate time.

- 2) The appointed personnel shall draft a policy for response to the complaint on the basis of the investigation and verification results.
- 3) After deliberation at Executive meeting, the President shall consider the draft response policy to determine the response policy.
- 4) The appointed personnel shall handle the complaint in accordance with the response policy.
- 5) If necessary or upon request from the filing party, the appointed personnel shall report the progress of the complaint handling process to the filing party in writing.

(5) Steps after Termination of Complaint Handling

- 1) Upon termination of the complaint handling, the appointed personnel shall promptly give notice of the results of the handling to the filing party in writing.

The appointed personnel shall clearly state the procedure for appealing in the Notice of Complaint Handling Results.

In addition, a draft of the document in case of publication shall be provided according to 5. 3.

- 2) If the filing party is dissatisfied with the complaint handling results, it may file an appeal against them to JFSM no later than fourteen (14) days after the receipt of the Notice of Complaint Handling Results.
- 3) In the event of an appeal against the complaint handling results, the steps for acceptance and handling stipulated in "Provision for Handling of Appeals".

## 5. Others

### 5.1 Suspension of Complaint Handling

If the matter concerned with complaints accepted is put to litigation or arbitration before the handling reaches completion, the handling pursuant to this Provision shall be suspended until the end of the litigation or arbitration.

### 5.2 Record and Reporting of Complaint Handling

- (1) The appointed personnel shall keep records of the progress of the handling of the complaint accepted, and complaint handling results.
- (2) The Secretary-General shall report to the Board of Directors on the progress of the handling of complaints accepted, complaint handling results, and the existence or absence of appeals against the response.

### **5.3 Publication of Complaint Handling Results**

JFSM shall confirm with the complainant as well as the relevant organizations and institutions, if any, whether or not to publish the process and results of the response to the complaint on the JFSM website.

In addition, if JFSM judges that publication is not appropriate for reasonable reasons, it may not publish the information.

Circumstances related to whether or not to make the above public announcement shall be described in the record in 5.2.

### **5.4 Prohibition of Discriminatory Behaviors**

JFSM shall respond to complaints in a fair and impartial manner, and shall ensure that the association's employees are aware that the complainant will not be discriminated against due to policy decisions regarding complaints.

### **5.5 Non-Disclosure**

JFSM shall keep confidential any information acquired on the basis of complaints handling, and shall not disclose it to any third party or publish it without the consent of the filing party other stakeholders.

**Form 1**

To: Japan Food Safety Management Association

**Complaint Statement**

Date	年 月 日
Organization	
<i>“Furigana” for JP only</i>	
Name	
Contact Information	Postal Address:
	Telephone:
	Fax:
	E-mail:
Statement	(Separate sheets may be attached.)
Supporting Materials, etc.	(If any supporting documents and materials are attached, please specify their titles.)

For Use by the Secretariat Only

Date of Receiving:

Name of Receiving Person:

(Receiving person -> Receiving personnel: General Affairs Dept., Secretariat)

### Revision history

Outline of revision	Date of enactment/revision
Newly published	Feb. 18, 2020
This provision was revised in accordance with the release of JFS-C Certification Program Ver. 3.1.	August 18, 2021