



Complaints and Non Conformance Reporting

CUSTOMERS

1. Introduction

The purpose of this procedure is to describe the effective management and resolution of complaints from external parties and internally generated non-conformances regarding any aspect of the Company's business and the subsequent review and prevention activities.

2. Scope

This procedure applies to all Company activities, suppliers and contractors regarding complaints/non-conformances received from customers, members of the wider community and all other interested parties.

It excludes regulatory notices e.g. from the Health & Safety Executive / Health & Safety Authority or Environment / Environmental Protection Agency which are logged and actioned separately.

3. References

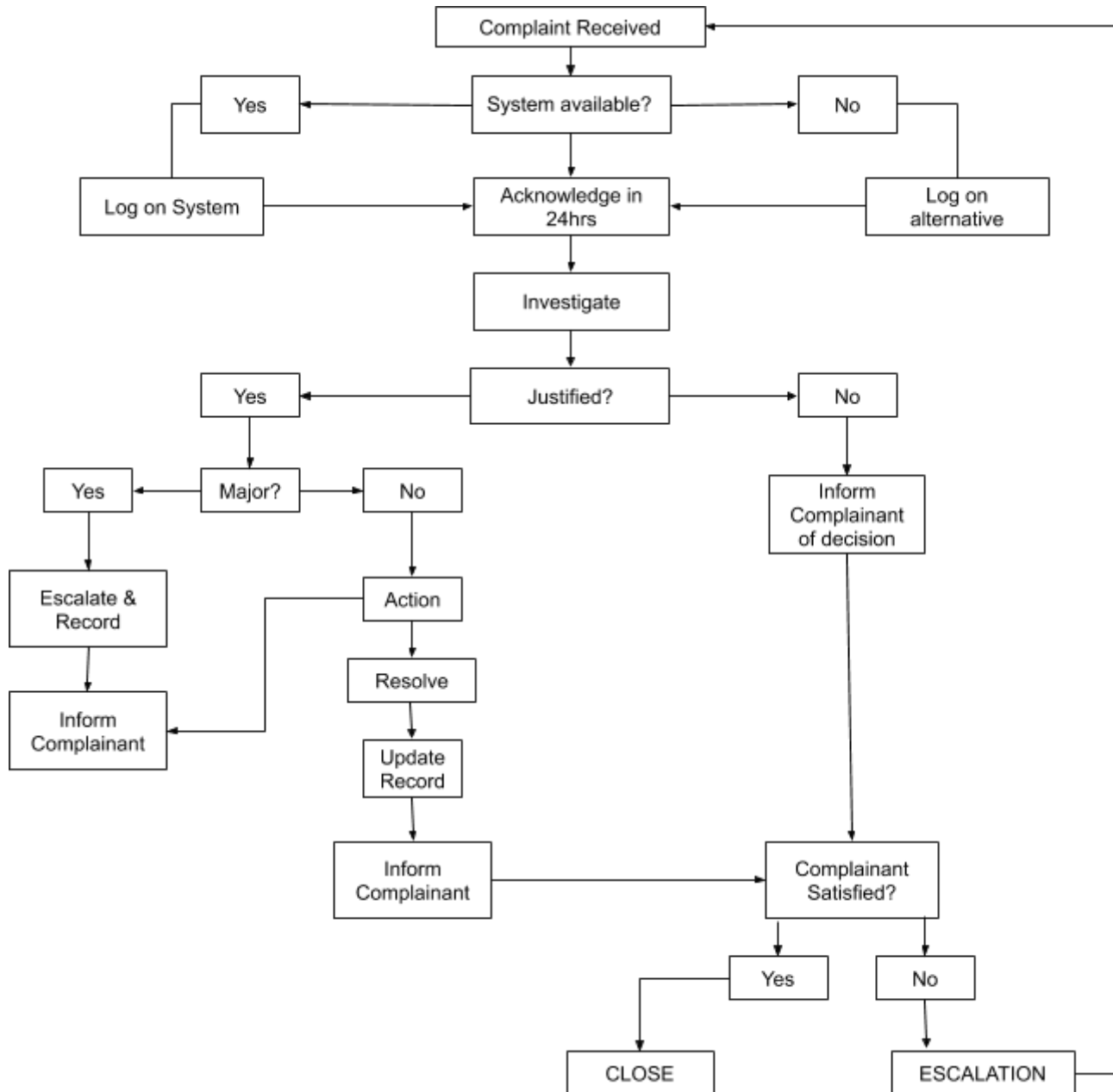
The Company management system and all pertinent documents related to the Company.

4. Definitions

Complaint:	A formal, written or verbal, communication expressing dissatisfaction with something Veolia has or hasn't done in respect to its business activities and can be in relation to products or services supplied by the organisation,
Major Complaint:	A Complaint that, the essence of which, has a high risk of serious disruption to our services, legal action, reputational damage or loss of revenue.
Corrective Action:	Action to eliminate the cause of a complaint and to prevent recurrence.
Preventive Action:	Action to prevent the occurrence of Complaints.
Non-Conformance:	Any activity, situation, instance or product that breaches a company / procedural / legislative / customer / contractual / QHSE / supplier requirement.
The Manager:	Where used within this procedure refers to the manager with direct responsibility for the Site / Contract / Location / Department/Portfolio of sites regardless of actual job title.

5. Procedure

5.1.1 Complaint Process Flowchart





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5.1.2 Raising a Complaint

For the avoidance of doubt a complaint includes:

- Telephone calls/verbal complaints received at a facility or head office
- Written complaints received from customers, the public, neighbours, regulatory bodies, local authority or commercial clients.

All complaints will be recorded by the relevant site or department Manager on one of the following systems (where used);

- Salesforce
- AVA
- Mims
- Wims
- Complaint/Non-Conformance Report Form (SYS/2/007/001)
- Any other appropriate local complaints handling system

The Manager will acknowledge receipt, within 24 hours, to the complainant and issue instructions to the appropriate parties for investigation, resolution and response.

The Manager will be responsible for maintaining communications with the Complainant and all relevant Veolia personnel throughout the resolution process and for a mutually agreeable outcome.

Where none of the above systems are available, or as an interim measure, a complaint report form (SYS/2/007/001) may be completed and monitored to ensure that satisfactory progress is being achieved in dealing with the complaint and completing the proposed corrective action. The information must then be transferred to one of the systems where locally required at the earliest opportunity.

5.1.3 Categories of Complaints

Complaints being recorded on AVA shall be categorised in accordance with the following:

- None – a complaint that is not justified.
- Minor – A substantiated localised and isolated event that can be dealt with by site staff and management to the satisfaction of the complainant.
- Major – A complaint that, the essence of which, has a high risk of serious disruption to our services, legal action, reputational damage or loss of revenue.

For all complaints, the receiving Manager will determine if the Complaint is a Major. Major Complaints must be immediately escalated to an appropriate Director for agreement on appropriate action. This will include communications with peer level representatives of the Complainant and Senior managers.

5.1.4 Justification

If, following investigation, a complaint is found not to be justified. The Manager will communicate this to the complainant with details of why the decision was made. The Complainant will have the option of escalating their Complaint to the next Management levels if they wish to do so.

5.1.5 Review

The Manager shall regularly review complaints to identify whether any trends are applicable. Details of significant complaints or trends will be included in the next level Management Review. Preventive action shall be appropriate



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to address any trends identified. Any instances of significant complaint shall be escalated to applicable Divisional Senior Management.

5.1.6 Preventive Action

In the course of Management Review, Managers will consider potential sources of complaint, determine their probability and risk and assign appropriate actions to prevent occurrence.

For example;

EVENT	CAUSE	RISK	PREVENTATIVE ACTION
Loss of customer satisfaction and eventual loss of Contract / business	Failure to deliver customer requirements, Failure to change service to meet market / contract developments. Failure of complaints system. Lack of commitment to Quality	Moderate to High	Regular contract meetings with Client. Regular review of service provision and contract requirements. A stringent complaints procedure with regular training of new staff on the procedure. Ensure commitment of top management to QA / EMS.

5.2 Non-Conformance Reporting

5.2.1 Typical non-conformances would be raised and recorded via:

- SYS/2/004 the procedure for Management System Audit to Ensure
- Continuous Improvement;
- SYS/2/007 Complaints and Non-Conformance Reporting
- SYS/2/015 Monitoring and Review of Location/Office Health, Safety, Environment and Insurance Risk;
- SYS/2/024 QHSE Due Diligence;
- SYS/2/028 Business Continuity Management;
- SYS/2/037 Reporting Accidents, Incidents, Near Misses and Enforcement Authority Communications.

5.2.2 The applicable Manager is responsible for ensuring all non-conformances and actions taken shall be recorded either within AVA, where this is appropriate, or via the Complaint / Non-Conformance Report Form .

5.2.3 The Manager shall timely and effectively:

- determine and implement corrective action associated to the non-conformance including, where applicable, consideration of any other similar instance
- determine and implement action to eliminate the root cause of the non-conformance (including any procedures / work instructions / method statements/risk assessments review)
- review the effectiveness/suitability of all actions taken.

5.2.4 The Manager shall ensure all non-conformances are subsequently reviewed and analysed in accordance with SYS/2/002 the procedure for Management Review. Any instances of significant non-conformance shall be escalated to applicable Divisional Senior Management.

6. Variation

None.

7. Documentation

Reference No	Title	Minimum Retention Period
SYS/2/007/001	Complaint / Non-Conformance Report Form	3 years