



# Complaints Handling Procedure

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## Complaints

Kaizen Certification Ltd. will have complete control over the complaint handling process. The handling procedure will ideally use the following components and techniques:

- a. A breakdown of the procedures used to receive, validate, investigate, and decide how to respond to a complaint.
- b. Keeping track of complaints and recording the responses provided in response to them.
- c. Ensuring that any required adjustments and remedial action are made.

Kaizen Certification Ltd will be responsible of gathering and confirming all the information necessary to support the complaint after receiving it. Due to the submission, examination, or resolution of any received complaints, Kaizen Certification Ltd will not act in a discriminatory manner toward the complainant. Kaizen Certification Ltd shall determine if, and if so, to what extent, the subject of the complaint and its resolution will be made public, in conjunction with the Company and the complainant.

### How to report a Complaint

On the website for Kaizen Certification, you can lodge complaints by phone, email, letter, or online:

- a. Email: [complaints@kaizencertification.co.uk](mailto:complaints@kaizencertification.co.uk)
- b. Telephone: 056 0368 3276
- c. Online: <https://www.kaizencertification.co.uk/complaints>
- d. In writing: Kaizen Certification Customer Services, Bishops Court, 17a The Broadway, Hatfield, Herts AL9 5HZ

We publish, telephone, email, and postal contacts, the Scheme Manager or equivalent key post-holder, our Code of Conduct, our complaints, appeals, and disciplinary procedures, and any charges. This information is readily accessible to the public, and an annual report for Scotland is provided to Scottish Government.

### Information Required

In complaints, the following information should be provided:

1. The complainant's name
2. The address of the complainant.
3. Contact details (telephone and email).
4. Feedback accessibility (recommended time to exchange feedback/increase the complaint's investigation, etc.).
5. The nature and specifics of the complaint.

For complaints involving members of the Kaizen Certification Ltd scheme, the following extra information will be needed, where known:

1. The member identification number for Kaizen Certification Ltd.
2. The participant's name who finished the assignment.
3. The time that the activities were completed.

The following additional information regarding grievances against Kaizen Certification Ltd should be submitted, if applicable and available:

1. EPC RRN, or another relevant audit reference number
2. The employee's name

Kaizen Certification Ltd. will manage every stage of the complaint handling process outlined in the following subsections.

## Complainants

Any complaint will be handled by Kaizen Certification Ltd in accordance with the three categories described in this document. Who may file a complaint is not limited by Kaizen Certification Ltd, and the following list is provided:

1. Householder/ Client.
2. Householder's/ Client's agent (estate agent or solicitor).
3. Employer of the scheme member.
4. Kaizen Certification scheme member.
5. Compliance officer (trading standards or building control).
6. Member of public.
7. Candidate undertaking a Kaizen Certification Ltd training course.
8. Training Awarding Body.
9. Certification Body.
10. Government Department (MHCLG, Scottish Government, BEIS, Environment Agency).
11. Building Control.
12. UKAS.
13. Local Authority.
14. Any other stakeholder.

The list above is not all-inclusive, and Kaizen Certification Ltd will handle any additional complaints in the same way. There is no fee for filing a complaint, and Kaizen Certification Ltd. will cover any costs associated with settlement.

When a complaint is received, Kaizen Certification Ltd will determine if it relates to certification activities under its purview and respond accordingly.

If the complaint relates to a Kaizen Certification Ltd.-certified organisation, the complaint's investigation will, if appropriate, take into account the efficiency of the certified organisation's management system. Kaizen Certification Ltd. will also promptly refer any legitimate grievance against a certified organisation to that organisation.

## Categories of Complaints

This Complaints Procedure is used by Kaizen Certification Ltd to guarantee that any complaint received will be handled properly and according to a defined procedure. The three categories into which complaints are divided are as follows:

1. Complaints against Scheme Members.
2. Complaints against Kaizen Certification Ltd.
3. General Complaints.

Each category is further explained below.

## Complaints against Scheme Members

All complaints submitted about the conduct of scheme participants will be handled by Kaizen Certification Ltd and fall under one of the following categories:

1. The member must acknowledge the Scheme's enquiry within three working days and supply all requested evidence within 15 working days (an extension of up to five working days may be granted for legitimate reasons such as illness – see Appendix 5.1 Audit Timescales).
2. Where the complaint is upheld the member shall request the defective certificate be marked "Not for Issue" and lodge a correct replacement within 10 working days.
3. Failure to meet either deadline results in immediate suspension; continued non-compliance may lead to revocation in accordance with Appendix 5.3.

Unless the nature of the complaint renders this route unsuitable, clients of scheme members have the option of bringing a complaint directly to Kaizen Certification Ltd after (or before) the complaint has been brought to the scheme member or organisation that they represent.

According to the "Code of Conduct" for each certification scheme, members of the scheme are obligated to give copies of their own complaints procedures and Kaizen Certification Ltd's Complaints Procedure to each of their clients.

## Complaints against Kaizen Certification Ltd

All complaints made against Kaizen Certification Ltd will be handled by that company, including but not limited to those that fall under the following categories:

1. Behaviour of a member of staff (employed or contracted).
2. Training course and associated services.
3. Assessment and Certification.
4. Timescales and/ or the output produced as a result of an assessment/ audit.

## Handling Harassment Complaints

This applies to all complaints of harassment, including but not limited to, workplace harassment, harassment by members, harassment involving stakeholders, and any other forms of harassment related to our operations and services.

### *Definition of Harassment:*

Harassment is defined as any unwelcome conduct that is based on race, colour, religion, sex (including pregnancy), national origin, age (40 or older), disability, or genetic information.

Harassment becomes unlawful where enduring the offensive conduct becomes a condition of continued service or the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

### *Procedure:*

#### *Reporting:*

- Complaints of harassment can be reported via email, telephone, or through our online portal.
- The complaint should include details such as the nature of the harassment, the individuals involved, and any evidence or documentation that supports the claim.

#### *Investigation:*

- Upon receipt of a complaint, a preliminary investigation will be conducted to determine its validity.
- This investigation will be impartial and thorough, ensuring the confidentiality of all parties involved.

#### *Action and Resolution:*

- If the complaint is found to be valid, appropriate action will be taken against the individual(s) involved. This may include disciplinary action, up to and including termination of membership or employment.
- Resolutions will be communicated to the complainant and the accused, ensuring that all parties understand the outcomes and any subsequent actions.

#### *Appeals Process:*

- Both the complainant and the accused have the right to appeal the decision. An independent appeals committee will review the appeal, ensuring an impartial and fair evaluation.

#### *Support to Stakeholders:*

- We are committed to providing support and guidance to stakeholders affected by harassment.
- Information and resources will be made available to help stakeholders understand their rights and the support available to them.

#### *Prevention and Training:*

- Regular training and awareness programs will be conducted to prevent harassment.
- All members and employees are required to participate in these programs to understand the standards of conduct expected of them.

#### *Record Keeping:*

- All complaints and actions taken will be documented and maintained in a confidential complaints log.
- This log will be reviewed regularly to identify patterns and implement preventive measures.

## General Complaints

Any other general concerns will also be handled by Kaizen Certification Ltd:

1. Scottish Government.
2. UKAS.
3. Gemserv.
4. REA.
5. DEFRA.
6. BEIS.
7. Environment Agency.
8. Energy Performance of Buildings Directive (EPBD).
9. TrustMark
10. Output produced by another scheme member.

All general grievances shall be handled in accordance with the procedures described in this article.

## Dealing with the Complaint

- Acknowledgement – Every complaint is logged on the Complaints Register and acknowledged (e-mail or telephone) within one working day of receipt.
- Initial review (within 5 working days) – We confirm the complaint is in scope, decide which route to use (member conduct, scheme conduct or general) and, where relevant, notify the member concerned.
- Investigation & updates – A full investigation starts immediately after the initial review. We issue progress updates to the complainant at least every 10 working days until closure. If that interval cannot be met for reasons beyond our control we give the reason and a revised timetable.
- Outcome – A written decision, including any corrective or disciplinary action and its rationale, is issued within 30 working days of the acknowledgement (sooner where possible). Where a defective certificate is confirmed we ensure it is marked “Not for Issue” and replaced at no cost to the stakeholder.
- Record-keeping and reporting – All complaint files are retained for a minimum of five years in line with UK GDPR. A summary of every complaint appears in the monthly Complaints Return sent to MHCLG in the prescribed template.
- Cost-free access – The entire procedure is free of charge to complainants.

### Complaints against Scheme Members

The appropriate departmental complaint handler will review all complaints regarding the conduct of a scheme member using the following procedure:

1. Scheme Members are required to respond to complaints within three working days, providing all relevant documentation as requested by Kaizen Certification Ltd. In cases of non-response or repeated complaints, escalation to a formal audit or disciplinary action may be initiated as per the SOR guidelines.
2. The complaint handler will thoroughly analyse both the scheme member's response and any supporting documentation. To address the nature of the complaint, this may involve visiting the site or doing a desktop investigation.
3. The scheme member will get written confirmation of the nature and scope of the complaint if the complaint is upheld. All immediately impacted reports must be withdrawn or suspended as necessary and, if necessary, relogged within five working days of receiving the notification from Kaizen Certification Ltd.
4. The corrective action that will be needed of the member, such as CPD, retraining, or increased auditing, must also be confirmed in writing.
5. Corrective actions must be implemented and reported back within a 30-day window from the date of notice. Failure to comply will lead to further disciplinary measures, including suspension or termination of membership, as per the updated SORs.

6. The scheme member will be advised of the divergence from the accepted quality standards and processes and will be given an obligatory improvement action list in the case of more serious complaints that necessitate resolution, such as changes to the scheme member's working methods. Their scheme membership may be terminated until they have made the necessary upgrades to their own quality management system and have given Kaizen Certification Ltd. tangible proof of those upgrades. The efficiency of the improvement activity will be evaluated by observing future action. Any suspension case may go to expulsion if any of the following occurs:
  - a. incorrect implementation of the corrected action.
  - b. numerous complaints that are upheld against a scheme participant.
  - c. being judged responsible for wilfully misrepresenting Kaizen Certification Ltd. policies or the scheme regulations.
7. Expulsion of the scheme member may be necessary in conjunction with corrective action for the infringing conduct in cases when complaints are highly serious and reflect a major departure from the operational quality standards that are acceptable. All expulsion instances will be communicated to all other certification programmes.

### Complaints where Criminal Activity is involved

Where information suggests fraud or any other criminal offence, the matter is escalated immediately to a Company Director. Kaizen Certification Ltd will:

- report the allegation without delay to the appropriate authority (e.g. police or local Trading Standards);
- inform MHCLG that a referral has been made and keep them updated; and
- secure and preserve all relevant evidence.

Normal complaints timescales are suspended while an external criminal investigation is under way, but the complainant is kept informed of significant milestones.

### Member Complaint Requests

To aid in the settlement process, Kaizen Certification Ltd may choose to get in touch with the clients of scheme members. Customers of participants of the scheme will be requested to provide feedback on the following:

1. Information and contact prior to the visit.
2. Onsite behaviour.
3. Technology/ Measure Information.
4. Post-visit information and certificate production.

Both the Complaints Procedure and each member's "Code of Conduct" specific to their certification must be followed by all scheme members. The table below outlines the audit requests Kaizen Certification Ltd will make to members of each scheme in response to complaints to make sure the relevant scheme standards are being followed.

They will be examined and noted. If this isn't done, steps may be taken that could lead to the scheme member's suspension and/or revocation from the programme.

### No Cost Complaints Process for Stakeholders

- Policy Statement: Kaizen Certification Ltd is committed to providing a transparent and accessible complaints process for all stakeholders. Any complaints regarding the quality of an energy certificate or the conduct of a scheme member will be addressed at no cost to the complainant.
- Procedure for Filing a Complaint: Stakeholders can file complaints through multiple channels including email, telephone, and a dedicated online portal. Clear instructions and assistance are provided to facilitate the submission process.
- Timeline for Complaint Processing: Upon receiving a complaint, an initial response is provided within three working days. A comprehensive investigation is conducted, and efforts are made to resolve the issue within a predetermined timeframe, typically 15 working days.
- Communication and Updates: Regular updates are provided to the complainant throughout the investigation process. Transparency and continuous communication are key aspects of our approach.
- Kaizen will include the monthly complaint statistics in its DELTA Monitoring Return to MHCLG.

### Complaints Log Maintenance

Kaizen Certification Ltd maintains a secure electronic Complaints Register that records, for every case:

- unique reference number;
- complainant details;
- member ID (where applicable);
- RRN/UPRN (or other audit reference);
- dates of receipt, acknowledgement, key actions and closure;
- findings, corrective or disciplinary actions, follow-on audits.

The register is reviewed monthly by senior management to spot trends that feed into training, CPD and audit selection.

For Scottish operations, the complaints register and summaries will be made available to Scottish Government auditors on request, and a high-level summary is included in the AO annual report.

A summary return, in MHCLG's standard spreadsheet, is submitted no later than the last working day of the month following the reporting month, in accordance with Appendix 1.2.2 of the SORs.

### Complaints Process for Members Dissatisfied with the Conduct of the Scheme

- **Introduction:** Recognizing the importance of member feedback, Kaizen Certification Ltd has established a dedicated procedure for members to express dissatisfaction with the scheme's conduct without incurring any costs.
- **Filing a Member Complaint:** Members can raise concerns or complaints about the scheme's conduct through specified channels, ensuring their voices are heard and addressed promptly.
- **Investigation Process:** Each complaint from members is taken seriously and investigated impartially. The investigating team is separate from the operational teams to ensure unbiased review and decision-making.
- **Outcome and Resolution:** The resolution process is carried out with the utmost fairness and diligence. Members are informed of the investigation's outcome and any actions taken in response to their complaints.

### Terms for Handling Verbal and Written Complaints

- **Documentation of Verbal Complaints:** Verbal complaints are documented meticulously by our staff at the time of the complaint. This documentation is then reviewed and processed with the same level of detail and seriousness as written complaints.
- **Terms and Conditions:** The complaints process is governed by specific terms and conditions to ensure fairness and confidentiality. These include the impartiality of the investigation, protection of the rights of both the complainant and the accused, and adherence to data protection regulations.
- **Finalisation and Feedback:** Upon concluding the investigation, feedback is solicited from the complainant to improve our complaints handling process. This feedback is crucial for our ongoing efforts to enhance the quality and effectiveness of our services.

### Notifications - EPBR Scheme Members only

For all scheme participants with multiple memberships, Kaizen Certification Ltd requires them to send a copy of their complaint to each certification body and recognised organisation. The complaint will then be handled by the proper certification authority or approved organisation. For instance, the certification body/approved organisation via which the certificate was submitted will be in charge of handling a complaint on a specific output.

## Digital Security Measures in Complaint Handling

Kaizen Certification Ltd is committed to ensuring the security and confidentiality of all data involved in the complaints handling process. In accordance with the latest SORs, all complaints and related correspondence must be transmitted using encrypted communication channels, and access to digital complaint records should be subject to multi-factor authentication to ensure compliance with industry-standard cybersecurity practices. This section outlines the measures we take to protect personal and sensitive information:

1. **Secure Data Transmission:** All digital communications involved in the complaints process, including emails and online submissions, are encrypted using industry-standard protocols to prevent unauthorised access.
2. **Data Access Control:** Access to digital records of complaints is strictly limited to authorised personnel. This is enforced through the use of role-based access controls and regular audits of access logs.
3. **Regular Cybersecurity Training:** Employees involved in the complaints handling process receive regular training on best practices for data security, focusing on the latest cybersecurity threats and how to prevent them.
4. **Data Retention and Disposal:** Personal data collected during the complaints process is retained only as long as necessary to resolve the complaint and for any legal or regulatory requirements. All data is disposed of securely in accordance with GDPR and other relevant regulations.
5. **Incident Response:** Kaizen Certification Ltd has an established incident response plan that is activated in the event of a data breach involving complaint information. This includes immediate measures to secure data, assess the impact of the breach, and notify affected individuals and regulatory bodies as required.

By implementing these digital security measures, Kaizen Certification Ltd ensures that all complaint-related information is handled in a secure and responsible manner, protecting both the complainants and the integrity of the complaints process.

## Escalation and Independent Third-Party Appeals

If any party is dissatisfied with the written outcome under “Dealing with the Complaint” they may appeal within 20 working days of the decision.

### Stage 1 – Internal review

The case is reconsidered by a senior manager who had no prior involvement. A decision is issued within 10 working days.

### Stage 2 – Independent Third-Party Appeals Panel

Unresolved cases are referred to the Kaizen Certification Independent Appeals Panel. The Panel is entirely independent of day-to-day operations, has no commercial interest, and is constituted in line with Section 8 of the SORs. Its decision is final and binding.

This escalation route is free of charge and does not affect the complainant's statutory rights. Neither complainants nor members will be referred to MHCLG or the Scottish Government for adjudication.

## Complaints Resolution Process

Kaizen Certification Ltd is committed to providing its Members and the Customers of its Members with services of the highest possible quality. In the event that complaints are lodged, they will be addressed in a quick and expert manner. Kaizen Certification Ltd's strategy is to identify and address the fundamental problems that underlie customer complaints, then build new services around the principle of incremental progress.

### The act of lodging a complaint

We ask that any complaint be sent in the first instance to the Kaizen Certification Ltd Member who was asked to carry out the assessment if an identified person has commissioned an Energy Certificate from a Kaizen Certification Ltd Member. In this situation, the listed person has paid for the evaluation.

Complainants should visit Kaizen Certification Ltd's website and record their complaints using an online form if the issue is not resolved to their satisfaction. This form has been designed to collect the necessary information to enable us to conduct an initial investigation of the problem. If the issue is not resolved, complainants should visit Kaizen Certification Ltd's website. Complainants are strongly encouraged to have the following essential information readily available to facilitate the process:

- Accreditation Number or Name of Member who Carried Out the Work in Question
- EPC/Survey number if applicable
- Date Energy Assessment was Completed
- Detailed Description of the Problem or Complaint
- Complainant's Contact Information

### The Investigation, as well as the Response

Kaizen Certification Ltd has set a goal to react to a complaint within five business days of it being logged; this response will consist of an initial assessment of the issue, perhaps identifying a resolution, and contacting the person who submitted the complaint either via telephone or e-mail. In the event that the complaint cannot be resolved before Kaizen Certification Ltd provides its

initial response, the company will provide an estimate of the amount of time required to resolve the issue as well as what will occur in the next steps.

In the event that the Scheme Operating Requirements call for an audit of an Energy Certificate, please be aware that the process could take as long as six weeks. In any case, the complaint will be kept apprised of developments on a regular basis, unless they are specifically instructed differently.

After an investigation has been finished, the complainant will be notified of the results of the investigation through email.

### Legally Protected Liberties

Should the customer choose to take part in the scheme's complaints resolution process, Kaizen Certification Ltd would like to emphasise that their legal and statutory rights will not be harmed in any way by their participation in the process.

### First Step

If the complainant is still unsatisfied with the response that Kaizen Certification Ltd has provided to their complaint and believes that they have a valid reason for Kaizen Certification Ltd to review the complaint, then the complaint will be escalated to the next tier of management, which is the relevant Business Unit Team Leader/Manager, and they will become responsible for the resolution of the complaint.

### Second Step

If the complainant decides to appeal the judgement at a later date, the matter will be sent to the Accreditation Committee for further review. The Accreditation Committee is made up of Kaizen Certification Ltd employees who are experts in their fields and who have not been involved with this matter in the past. In the end, it will be the Committee's job to decide whether or not there should be an appeal following a complaint.

### Third Step

We will refer the complaint to an independent third party for a decision.