Management System Procedure

Procedure: 06 Control of Nonconformities & Complaints	Date: 05.11.26	Page 1 of 8	Version: 4	Authorised: M Weaver

Purpose:	This Procedure defines the arrangements and responsibilities for reporting, controlling, investigating and resolving nonconformities, incidents, near misses and complaints. It ensures that immediate correction and proportionate corrective action are taken, causes are addressed, recurrence or occurrence elsewhere is prevented, and opportunities to improve quality, environmental and occupational health and safety performance are identified.
Scope:	This Procedure applies to actual and potential nonconformities, incidents, near misses, complaints and adverse trends arising from products, services, processes, projects, workplaces, environmental aspects, compliance obligations, contractors, suppliers and other externally provided processes. It covers identification, reporting, immediate control, investigation, correction, corrective action, communication, verification of effectiveness, learning and closure.
Responsibility:	The Managing Director retains overall accountability for the effectiveness of this Procedure and for ensuring that adequate resources are available. Relevant Managers are responsible for timely containment, investigation, risk evaluation, corrective action, communication and effectiveness review within their areas. Workers and their representatives shall participate in OH&S incident and nonconformity investigations where applicable, and all personnel shall report actual or potential nonconformities, incidents, near misses and complaints without undue delay.

Flow	Procedure	Responsibility	Relevant Form
1. Risk management	1.1 The company shall identify and address risks and opportunities that could affect the intended outcomes of the integrated management system, including conformity of products and services, environmental performance, fulfilment of compliance obligations, prevention of injury and ill health, and continual improvement. 1.2 Key actions will be defined in the following procedures: 01 Legal & Other Requirements – review of new or updated legal or other requirements to ensure compliance is built into the Management System 02 Risk Management Register identifies and evaluates risks to the business in context and identifies a strategy of control. 05 Management Review & Internal Audit – implementation of any issues identified during the internal audit and review lessons learnt 08 Operations, Surveying and Installation procedures – risk assessment to identify any potential quality, safety or legality issues in products, services, processes or change management 09 Maintenance – equipment inspection and calibration checks. 10 Approved Suppliers – to ensure products and outsourced processes are provided by suitable and reliable suppliers to Meet the Company's requirements on environmental standards, quality, safety, required delivery dates and price competitiveness 12 Sales, Contracts & Tenders– customer requirements investigated to identify any potential quality, safety or legality issues within each contract and job. 13 Health & Safety - risk assessments identify any potential safety or legality issues in company operations and identifies management strategies in line with the hierarchy of control. 14 Environmental - Aspects and Impact assessment to identify any potential environmental or legality issues in company operations and the principles of preventative action will form an integral part of all other company procedures.	Relevant Manager	02 Risk Management Register

Flow	Procedure	Responsibility	Relevant Form
2. Reporting, Inspection and Investigation	2.1 The Nonconformity Procedure supports the continual improvement culture of the business by facilitating and capturing opportunities for improvement in quality, environmental and health & safety issues. Improvement opportunities may be identified ad hoc or as part of the formal management and internal audit processes. 2.2 A nonconformity, incident, near miss or complaint shall be reported without undue delay where a product, service, process or activity fails to meet customer, contractual, legal, regulatory, environmental, OH&S, management system or other applicable requirements; where an undesirable incident, emergency, adverse trend or significant monitoring failure occurs; or where an issue is identified through audits, inspections, worker reports, interested-party feedback, supplier performance, compliance evaluation or management review. 2.3 On receipt of a report, the Relevant Manager shall respond in a timely manner to control and correct the issue, deal with any actual or potential consequences, protect persons and the environment, preserve relevant evidence and prevent unintended use, delivery or continuation of affected work. The matter shall then be investigated, an authorised decision shall be made on further action, and the details and decisions shall be recorded. 2.4 A nonconformity, incident, near miss or complaint may arise at the head office, a satellite office, a project site or any other location associated with the company's operations. 2.5 A nonconformity, incident, near miss or complaint may relate to a product or service supplied to the company, work performed for a customer, an externally provided process, a contractor or supplier activity, or any other stage of the supply chain in which the company operates. 2.6 The Relevant Manager shall communicate any immediate controls, restrictions or instructions needed to protect persons and the environment and to prevent unintended use, delivery or continuation of affected work. Wider communication, lessons learned and retained evidence shall be managed in accordance with clause 4.1.	Any member of staff/Relevant Manager Management team 05 Management System Review and Audit	06A Nonconformity Report

Flow	Procedure	Responsibility	Relevant Form
3. Recording Details	3.1 Each nonconformity, incident, near miss or complaint shall be recorded with sufficient information to support traceability and effective action, including its source, date, location, applicable requirement, actual or potential consequences, immediate controls, affected products or activities, responsible manager and supporting evidence. The matter shall be entered on the appropriate log and allocated a unique sequential reference number. 3.2 The Nonconformity Log shall be analysed at planned intervals to identify recurring causes, adverse trends, emerging risks, opportunities, systemic weaknesses and issues affecting quality, environmental or OH&S performance. Significant findings shall be reported to relevant process owners and management review, and shall result in proportionate action, updated objectives or controls, additional audit or monitoring, or changes to the management system where necessary.	Member of staff identifying the matter / Relevant Manager 05 Management System Review and Audit	06A Nonconformity Report 06B Nonconformity Log
4. Communicating Nonconformities	4.1 Information on the nature, consequences, causes and required actions arising from a nonconformity, incident or complaint shall be communicated promptly to relevant personnel, workers and their representatives, suppliers, contractors, clients, regulators and other interested parties, as applicable. Communication shall include lessons learned and any changes to controls, methods, responsibilities, competence requirements or documented information needed to prevent recurrence or occurrence elsewhere. The Relevant Manager shall retain evidence of required communications.	Managing Director / Relevant Manager	
5. Corrective Actions	5.1 All nonconformities, incidents and significant complaints shall be investigated to determine their causes and contributing factors. The investigation shall evaluate whether similar issues have occurred, exist elsewhere or could potentially occur in other products, services, processes, projects, workplaces, environmental aspects or externally provided activities. For OH&S matters, relevant workers and, where they exist, workers' representatives shall participate in the investigation. The method, evidence, findings and conclusions shall be recorded. 5.2 Following investigation, appropriate corrections and corrective actions shall be identified and evaluated to ensure that the issue and its causes are addressed without creating adverse quality, environmental or OH&S effects. Before implementation, the organisation shall assess risks arising from new or changed hazards, consider significant environmental aspects, compliance obligations and lifecycle consequences, apply the hierarchy of controls for OH&S risks, and use the management of change process where applicable. Where affected product or service has already been delivered, the need for notification, concession, correction, recall or other action shall be determined. All decisions and actions shall be recorded.	Relevant manager Managing Director / Relevant Manager	06A Nonconformity Report

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5. Corrective Actions (Cont)	5.3 Corrective actions shall be proportionate to the actual and potential effects of the nonconformity, incident or complaint. Each action shall have a clearly defined owner, completion date, required resources, priority and evidence of completion. Overdue or ineffective actions shall be escalated to the Managing Director or designated senior manager, and progress shall be monitored through the relevant log and management review arrangements. 5.4 Material or product affected by a nonconformity on site will be isolated, or placed within the designated area, and a red "QUARANTINED" label will be attached, if deemed necessary. 5.5 Where material or product affected by a nonconformity has been released to the customer, it may be recalled as detailed in section 6 below. 5.6 On completion of the assigned corrective actions, the responsible action owners shall submit objective evidence of completion to the Relevant Manager for effectiveness review and closure in accordance with clause 5.7. 5.7 Where corrective actions have been completed, the Relevant Manager shall verify their effectiveness against defined acceptance criteria and confirm that the issue has not recurred or occurred elsewhere. Closure shall be authorised only when objective evidence demonstrates that immediate correction, cause elimination, required communication, risk and aspect updates, management system changes and lessons learned have been completed. If effectiveness is not demonstrated, further action, responsibilities and timescales shall be assigned and recorded.	Relevant Manager / Action Owners Relevant Managers Managing Director / Relevant Manager	06A Nonconformity Report / 06B Nonconformity Log
6. Risk Management Action	6.1 Where an investigation identifies a new or changed strategic, operational, quality, environmental or OH&S risk, the Relevant Manager shall ensure that the risk is evaluated and entered or updated in the Risk Management Register. 6.2 Risk treatment shall consider existing controls, legal and other requirements, significant environmental aspects, OH&S hazards, the hierarchy of controls, available opportunities and any need for management of change. The evaluation and selected treatment shall be recorded in the Risk Management Register. 6.3 Each risk-treatment action shall have an assigned owner, target completion date, priority, required resources and defined evidence of completion. Progress and overdue actions shall be monitored through the Risk Management Register and escalated where necessary.	Relevant Managers	06A Nonconformity Report

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6. Risk Management Action (cont)	6.4 The Relevant Manager shall review implemented risk controls at planned intervals against defined acceptance criteria. Where controls are ineffective, risk remains outside the organisation's acceptance criteria or further nonconformities occur, additional treatment shall be assigned, implemented and recorded. 6.5 Risk-treatment actions shall be closed only when objective evidence confirms that the controls are implemented and effective and the residual risk is within the organisation's acceptance criteria. Significant changes, emerging risks and ineffective controls shall be reported to management review.	Relevant Managers Managing Director / Relevant Manager	06A Nonconformity Report
7. Customer Complaints	7.1 A complaint is an expression of dissatisfaction, however made, about an installation, the standard of service, actions or lack of action by the company, its staff, subcontractors or others acting on its behalf, which affects a customer. Complaints may be made verbally or in writing by the customer or an authorised representative and will be accepted without charge. The company shall provide clear, accessible information on how to complain and shall make reasonable adjustments where required. 7.2 Each customer complaint shall be recorded, assessed and investigated by a person with sufficient competence and authority who was not directly responsible for the matter complained about, where practicable. The investigation shall determine the facts, causes, contractual and technical requirements, customer impact and appropriate remedy. Findings, evidence, decisions, corrective actions and lessons learned shall be recorded, and any resulting nonconformity shall be managed through the applicable sections of this Procedure. 7.3 Complaints may be received by any member of staff through any communication method and shall be forwarded promptly to the person responsible for complaint handling. The complaint shall be acknowledged within two working days, and the customer shall be told who is handling it, how that person can be contacted, the next steps, the expected response times and any information or access needed to investigate. Any failure to meet the acknowledgement timescale shall be recorded with the reason and communicated to the customer. 7.4 Complaints shall be investigated and resolved within 10 working days where reasonably practicable. If resolution cannot be achieved within that period, the customer shall be given a written progress update, the reasons for the delay, an agreed action plan and the date of the next update. Where an installed Energy Efficiency Measure needs to be inspected, the visit shall take place within seven days of receipt of the complaint where reasonably practicable. Where the customer is without heating or hot water, or an urgent health, safety or property risk exists, the complaint shall be prioritised and attendance or other appropriate action shall be arranged as soon as reasonably practicable, with a target of 24 hours.	Member of staff recording the complaint	06C Customer Complaint Report Zoho CRM

Flow	Procedure	Responsibility	Relevant Form
	7.5 Customer, or other stakeholder complaints will be recorded by completion of a complaint investigation report on the relevant Zoho CRM record. Technical Monitoring failure reports will be recorded on the relevant Zoho CRM record Tab. TM inspection failures that would be considered significant or major nonconformities will be elevated to a nonconformity and investigated accordingly. The complaint details should be recorded on the complaint log and a sequential unique reference number allocated.	Zoho Measure complaint Tab Zoho Measure TM Tab	06D Complaint Log
	7.6 An initial investigation will be undertaken to establish the cause of the complaint and actions taken to resolve the issue. Any contact with the customer, or other interested party must copied to the complaint investigation record by logging a call or adding a copy of any written communication sent out to the relevant installation project record.	Member of staff recording the complaint/ Relevant Managers	06A Customer Complaint Report Zoho CRM
	7.7 If the complaint is deemed to be of a serious nature it will be escalated to a nonconformity and be handled via the appropriate parts of this procedure.		
	7.8 The Complaint Log shall be reviewed at planned intervals to identify recurring causes, affected measures, installers, subcontractors, suppliers, customer groups, scheme routes, response-time failures, unresolved complaints and emerging risks. Significant trends shall be raised as nonconformities where appropriate and reported to management review. The review shall result in proportionate corrective action, changes to controls, competence, suppliers, customer information or processes, and verification that the actions taken are effective.	Managing Director	06D Complaint log
	7.9 When the investigation is complete, the company shall issue a written final response that summarises the complaint, the evidence considered, the investigation findings, the decision and reasons, any remedy or corrective action, the completion timescale and the customer's escalation options. The response shall state that use of the complaints or dispute-resolution process does not affect the customer's statutory rights.		

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	7.10 For installations delivered under ECO or another funding scheme, the company shall notify the relevant funder, scheme provider, TrustMark Scheme Provider, certification body or other oversight organisation where required by the applicable scheme rules, contract or certification arrangements. The company shall provide requested complaint records and evidence, cooperate with any investigation or inspection, implement agreed remedial and corrective actions, and keep the customer informed of any transfer or escalation.	Relevant Manager	06C Customer Complaint Report / Zoho Complaint record
	7.11 For complaints relating to MCS certified installations, the company shall take responsibility for the issue, work with the customer to achieve a prompt and fair resolution, and keep the customer informed of progress and outcomes. If the customer remains dissatisfied with the company's final response, or the company has not responded within 14 days, the customer shall be signposted to the MCS complaints process. The company shall cooperate fully with MCS and any relevant third parties and shall participate in Alternative Dispute Resolution (ADR) with a provider appointed and funded by MCS where a mutually agreed resolution cannot be reached through the MCS complaints process, irrespective of the company's certification status. When referred to ADR, customers shall be informed of the MCS-appointed ADR provider's name and contact details. Evidence of providing these details to the customer shall be retained. Records of the complaint, communications, decisions, remedial actions and escalation shall be retained.	Relevant Manager	06C Customer Complaint Report / Zoho Complaint record
	7.12 For work carried out as a TrustMark Registered Business, the company shall take responsibility for the complaint and seek to resolve it promptly and fairly. Where the complaint remains unresolved after the company has issued its final response, the customer shall be signposted to the company's relevant TrustMark Scheme Provider. If the complaint remains unresolved after the Registered Business and Scheme Provider stages have been exhausted, the customer shall be signposted to the Dispute Resolution Ombudsman. The company shall cooperate fully with the Scheme Provider and Ombudsman, provide requested records and evidence, implement agreed remedial or corrective actions, and retain records of all communications, decisions and escalation.	Relevant Manager	06C Customer Complaint Report / Zoho Complaint record
	7.13 Complaints from a funding partner, funding scheme provider or other client will be received, recorded and addressed in the same manner as a customer complaint.		

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8. Customer Satisfaction	8.1 Following the completion of programmed installation works customers are provided with details of how they can submit customer reviews on social media, Checkatrade and Trustmark. 8.2 Any adverse customer reviews will be raised as a customer complaint or nonconformity as appropriate. 8.3 Customer satisfaction will also be covered during any site inspections carried out by CT Eco Plus staff or independent inspectors. The inspector will record any complaint or nonconformities & report any issues to the relevant department for investigation and action. 8.4 Customer feedback results will be reviewed monthly at the management meeting.	Managing Director	Trustmark website Checkatrade Profile
9. Supplier Complaints	9.1 Complaints raised by the company against a supplier, subcontractor or other external provider are outside the customer complaints process in section 7. They shall be recorded, investigated and addressed through the supplier-management process and raised as nonconformities where applicable. Complaints received from funding partners, scheme providers or other clients shall continue to be handled in accordance with clause 7.13.	Member of staff identifying the nonconformity	06A Nonconformity Report
10. Review	10.1 Management shall review nonconformities, incidents, near misses, customer and supplier complaints, customer feedback, trends, overdue actions and effectiveness results in accordance with the Management System Review and Audit Procedure. The review shall evaluate systemic causes, repeated failures, quality culture, ethical behaviour, environmental performance, OH&S risks, compliance implications, opportunities for improvement and the need for changes to objectives, resources, competence, controls, suppliers, processes or the integrated management system. Decisions and actions shall be recorded in the Management Meeting Minutes.	Managing Director / Relevant Managers	05D Management meeting minutes