



## **EMS COMPLAINTS PROCEDURE**

**FOR THE DEVELOPMENT CONSENT ORDER  
APPLICATION FOR THE ALTERATION AND  
CONSTRUCTION OF HAZARDOUS WASTE AND LOW  
LEVEL RADIOACTIVE WASTE FACILITIES AT THE EAST  
NORTHANTS RESOURCE MANAGEMENT FACILITY,  
STAMFORD ROAD, NORTHAMPTONSHIRE**

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|---|--|---|
| <b>1 PURPOSE:</b><br>To ensure that when complaints are received, they are recorded; if substantiated, they are investigated as appropriate to determine root causes; to ensure adequate corrective actions are implemented; and to ensure records of complaints are kept and maintained.                         | <b>2 SCOPE:</b><br>All Sites and Off-Site Operations   | <b>3 RESPONSIBILITY:</b> <ul style="list-style-type: none"> <li>• Site Managers</li> <li>• Customer services teams</li> <li>• Sales Managers</li> <li>• All staff who may receive a complaint via telephone, email, or letter.</li> <li>• HSEQ Managers</li> <li>• Company Directors</li> </ul> |
| <b>4 RELATED DOCUMENTATION:</b> <ul style="list-style-type: none"> <li>• Section 4.5 and 5.3 <a href="#">Business Manual</a></li> <li>• <a href="#">Complaints Form (CPF14)</a></li> <li>• Schedule 1 reporting.</li> <li>• <a href="#">Action Tracking Management System (ATMS) Procedure (CPP51)</a></li> </ul> | <b>5 RECORDS:</b> <ul style="list-style-type: none"> <li>• Completed Complaints forms and related correspondence – stored as a 'record' on the Integrated Management System.</li> <li>• Entries in ATMS</li> </ul> |   |

## 6. DEFINITIONS

|                            |  |
|----------------------------|--|
| <b>Complaint</b>           | A complaint is any expression of dissatisfaction with a product or service.  |
| <b>Complainant</b>         | A person or organisation making a complaint.   |
| <b>HSEQ</b>                | Health, Safety, Environment and Quality.   |
| <b>Interested party</b>    | Any person or organisation which has an interest in the complaint, its effects, and the outputs of any investigation.  |
| <b>Leader</b>              | The person who organises and leads the complaint investigation team.   |
| <b>Sponsor or Champion</b> | The person who is responsible for the complaint, who can affect change by agreeing with the investigation's findings and will implement the corrective actions.  |
| <b>8D</b>                  | Eight Disciplines (8D) of Problem Solving. This is a problem-solving methodology designed to find the root cause of a problem, devise an initial containment action, and implement a long-term solution to prevent recurring problems. |

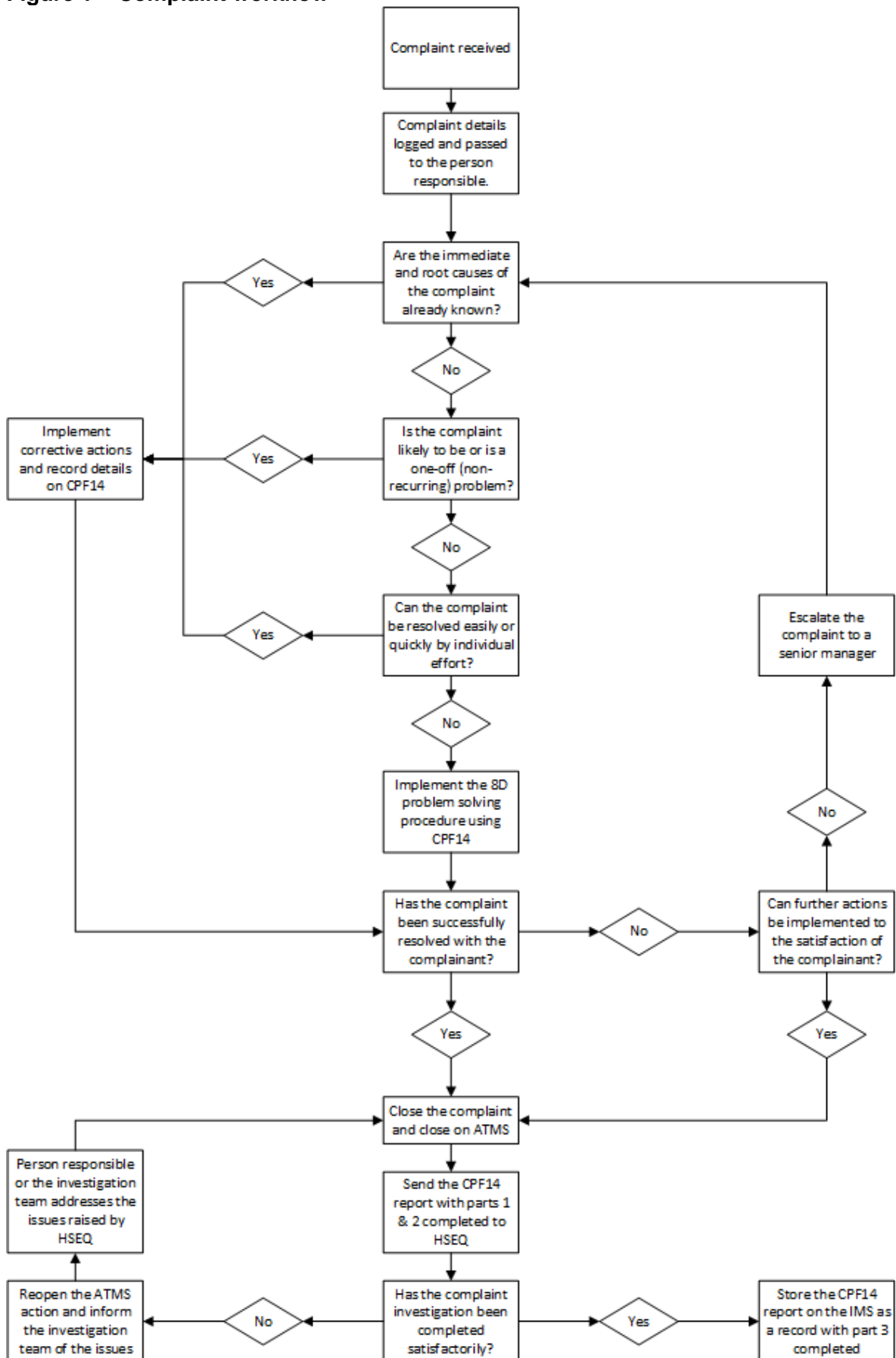
## 7. PROCEDURE

Complaints can be directly received to any point within the Organisation on performance/service delivery, environmental or health & safety issues from various interested parties including customers. All complaints and the subsequent investigations into them must be recorded using the [CPF14 form](#).

The process for handling a complaint from its initial receipt to its closure is described in the flow diagram Figure 1.

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**Figure 1 – Complaint workflow**



## Complaint Logged

7.1 Authorised personnel responsible for handling complaints are:

- Site Managers or their nominated deputy and Operational Managers for **performance, service environmental, and health & safety issues.**
- Customer service teams or Sales Managers for **performance, finance, and service issues.**
- Company Directors if a complaint is escalated beyond senior managers.

7.2 Complaints received in written form (for example fax, email, letter, or 'General Enquiry Form' completed via the website) should be passed to the relevant person detailed in 7.1 within the same working day as received.

7.3 For complaints received via a telephone call, the person answering the call must record the relevant details of the complaint. If they are not the person authorised for dealing with the complaint, then they must forward all the details of the complaint to the relevant person as detailed in 7.1 as soon as possible after taking the call and no more than one working day after receiving the call. The following information should be recorded as a minimum:

- Name of the complainant.
- Name of the Company that the complainant represents, or whether they are a member of the public.
- Date of the complaint or date of the incident that led to the complaint.
- The name of the Augean site and/or person(s) relevant to the complaint.
- The details of the issue(s) that gave rise to the complaint and the reason(s) why the complaint is being made.

7.4 The person receiving and recording the initial complaint in 7.3 **must not** apologise on behalf of the Company and must not (unless they hold suitable authority) propose a solution, compensation, or timescale for resolving the issue(s). If the person receiving the complaint is not the person authorised for dealing with the complaint, then they must clarify to the caller that the details of their complaint will be passed to the relevant person authorised for dealing with their complaint. They must also clarify to the complainant that it is the Company's policy to respond verbally to complaints as quickly as possible and within one working day.

7.5 If the person authorised for handling the complaint is unavailable for at least the next one working day (e.g., due to annual leave or illness) the information regarding the complaint must be forwarded straight away to their nominated deputy or their line manager.

## Initial Actions

7.6 The authorised person responding to the complaint must review the details of the complaint and decide on the next course of action for investigating the complaint. The following questions must be considered:

- Are the immediate and root causes of the complaint obvious or already known?
- Is the complaint likely to be a one-off (non-recurring) event?
- Can the complaint be resolved easily by individual effort?

7.7 If the answer is "no" to **all** of the questions in 7.6, then an 8D process **will be** required to investigate and resolve the complaint. The 8D process is described in sections 7.21.1 to 7.21.8 of this document.

7.8 If "yes" has been answered to **any** of the questions in 7.6, then an 8D investigation **is not** required.

- 7.9 If there is still doubt about how to proceed with the complaint investigation, then contact a member of the HSEQ team for further assistance.
- 7.10 If the authorised person responsible for handling the complaint has been passed the details of the complaint from a colleague, then the authorised person must contact the complainant within one working day of the complaint being received to verbally explain that they are the person responsible for dealing with their complaint. The authorised person will outline to the complainant the anticipated resolution timescale and the containment process. The complaint does not have to be resolved at this stage, but the complainant must be informed what will be done going forward to resolve the issue(s).
- 7.11 Once the relevant person who is responsible for handling the complaint has been given the details of the complaint and has had initial contact with the complainant over the telephone, they must complete Part 1 of the [Complaints Form CPF14](#).
- 7.12 When the person responsible for handling the complaint has recorded the details of complaint in Part 1 of the [CPF14 form](#) they must assign themselves an ATMS action for the for the complaint under the relevant site / department and under the category of 'Complaints'. The reference number generated by the creation of the ATMS action must be recorded on the [CPF14 form](#). They must set the 'Reviewer' of the ATMS action to the relevant HSEQ manager. The 'due date' must be set to match the resolution timescale that was agreed with complainant (see 7.10).
- 7.13 If this timescale for resolution of the complaint is expected to be exceeded, the complainant should be contacted at the earliest opportunity to explain the situation and the revised timescale for resolution.
- 7.14 Necessary and immediate actions must be taken to contain the issues that gave rise to the original complaint to prevent further complaints or issues. These actions must be recorded on ATMS and the CPF14 report. Include the reference number (see 7.12) in the text of these ATMS actions.

### Non-8D Investigation

- 7.15 If the person authorised for handling the complaint **is not** required to complete an 8D investigation (after consideration of the questions in 7.6) they must follow the non-8D process as outlined in Part 2 of the [Complaints Form CPF14](#). In their investigation they must do the following:
- Investigate and determine the immediate and root causes of the complaint.
  - Determine whether the problem that gave rise to the complaint could exist elsewhere in the business and highlight these areas within the report.
  - Implement any necessary corrective actions required to resolve the issues highlighted within the complaint.
- 7.16 Actions taken to resolve complaints must be recorded in Part 2 of the [CPF14 form](#) and the actions placed on ATMS.
- 7.17 At the end of the investigation process, the person authorised for handling the complaint must contact the complainant to inform them of the outcome of investigating their complaint and make a formal response to the complainant in writing to confirm the outcome of the complaint investigation and what actions have or will be taken.
- 7.18 If the complainant accepts the outcome of the investigation, then the person authorised for handling the complaint must close out the complaint by attaching the CPF14 report (which has parts 1 and 2 completed) to the ATMS action and ticking the 'Action Completed' box. If the person authorised for handling the complaint does not receive a response from the complainant within two working days of sending the formal response, they must follow up on the complainant in an attempt to get a response.

If no response can be obtained from the complainant after five more working days from the follow up, then the complaint investigation process can be closed. The CPF14 report should then be emailed to the HSEQ team using the [REDACTED] email address.

7.19 The HSEQ manager assigned as the 'Reviewer' will then review the CPF14 report (see section 8 of this document).

### 8D Investigation

7.20 If the person authorised for handling the complaint **is** required to complete an 8D investigation (after consideration of the questions in 7.6) they must follow the 8D process as outlined in sections 7.21.1 to 7.21.8 of this document and complete Part 2 of the [Complaints Form CPF14](#).

7.21 There are eight sections to the 8D process. These are as follows:

1. Team Formation
2. Problem Description
3. Interim Containment Actions
4. Root Cause Analysis
5. Corrective Actions
6. Verification of Corrective Actions
7. Preventive Actions
8. Investigation closure

#### 7.21.1 Team formation

The person authorised for handling the complaint will be required to construct a team to carry out the 8D process for the complaint. The team must comprise at least **four people** for an 8D investigation to be effective.

The authorised person will either lead the 8D investigation or select someone to be the 'Leader'. This person needs to be someone who is competent at the 8D process and can lead the team through the entire process. The Leader does not necessarily have to be knowledgeable about the problem but must be able to competently coordinate the following:

- Scheduling of meetings initially and periodically to review progress and discuss action items to meet all expectations.
- Ensuring that minutes or notes are taken during the meeting.
- Monitoring the progress of the investigation.
- Making sure that key decisions are reached at each meeting.
- Ensuring that completion dates for all actions are agreed and implemented.

The team will need a Sponsor (or Champion). This person will be the person authorised for handling the complaint if they are **not** leading the 8D assessment, or their immediate line manager if they are. The Sponsor will be responsible for affecting any changes by agreeing with the findings of the 8D investigation and can provide final approval on such changes.

The other individuals in the team must be selected based on their specialist knowledge and insight of the problem which caused the complaint. The individuals selected will depend on the nature of the problem.

### 7.21.2 Problem Description

Collect data-driven and fact-based details about the problem. These should be recorded to document the symptoms of the problem and should provide answers to questions like “who”, “what”, “where”, “when”, “why”, “how” and “how many?”. Collate this information on the [CPF14 form](#).

### 7.21.3 Interim Containment Actions

Identify and document necessary steps to ensure the issue is not immediately repeatable within Augean or does not spread to other interested parties and/or affect the public perception of Augean. These actions should be recorded on ATMS.

### 7.21.4 Root Cause Analysis (RCA)

The Leader of the 8D investigation team must select an adequate systematic method for identifying the root cause(s) of the problem that led to the complaint being made. The method of RCA selected by the Leader must be introduced and explained to the 8D team.

The results of the RCA must be documented in the [CPF14 form](#).

### 7.21.5 Corrective Action

Based on the results of the root cause analysis, the 8D team must identify corrective actions (or an improvement plan) to correct or fix the failures identified that led to the complaint. These actions should be permanent changes. For each action, the Leader must ensure that the team has identified what needs to be done, by when, and by whom, and how success will be measured.

The Leader must ensure that all corrective actions identified are tracked using ATMS.

### 7.21.6 Verification of Corrective Actions

The 8D team must track, measure, and evaluate progress on implemented corrective actions to determine if they were effective. The team must also establish if the issues identified by the complaint exist elsewhere in the business and take action to remove these issues. The Leader will develop a measurement programme to track progress in this regard. The person authorised for dealing with the complaint will verbally notify the complainant of the corrective actions implemented to resolve the complaint. If the complainant rejects the team’s actions for resolving the complaint, the person authorised for dealing with the complaint must record the details of the complainant’s objections and bring these objections to the team for further analysis. The Leader will advise the team on the next course of action which may require escalation as outlined in 7.25 to 7.30.

### 7.21.7 Preventative Actions

The 8D team must ensure that the entire process and system surrounding the origin of the complaint is now running error free. This may require some modifications to the current corrective actions, to verify that the process is operating correctly and not causing additional complaints. Updating policies or procedures, work instructions, or training plans may be required to ensure that improvements are standardised.

The Leader needs to make sure that the preventative action(s) are identified, who is responsible for implementing the action(s) and that the completion dates for the preventative actions have been agreed. All preventative actions must be tracked using ATMS.

### 7.21.8 Investigation closure

Activities in 8D Closure will include:

- Perform a final review of the problem-solving project.
- Finalise and archive the documentation associated with the investigation.
- Recognise the team’s success and individual contributions.

- Capture the lessons learned and integrate the findings into the business.

7.22 At the end of the 8D investigation process, the person authorised for handling the complaint must make a formal response to the complainant in writing to explain the outcome of the complaint investigation and what actions have or will be taken.

7.23 If the complainant accepts the outcome of the investigation, then the person authorised for handling the complaint must close out the complaint by attaching the CPF14 report (which has parts 1 and 2 completed) to the ATMS action and ticking the 'Action Completed' box. If the person authorised for handling the complaint does not receive a response from the complainant within two working days of sending the formal response, they must follow up on the complainant in an attempt to get a response. If no response can be obtained from the complainant after five more working days from the follow up, then the complaint investigation process can be closed. The CPF14 report should then be emailed to the HSEQ team using the [REDACTED] email address.

7.24 The HSEQ manager assigned as the 'Reviewer' will then review the CPF14 report (see section 8 of this document).

### Escalation

7.25 Escalation could be required if the complaint has not been resolved to the satisfaction of the complainant by the person authorised for handling the complaint and/or the 8D team.

7.26 The relevant company Director shall be made aware of the escalated complaint and will assume responsibility for resolving the complaint. The Company Director must be passed the [CPF14 form](#) that has been used throughout the original complaint investigation. The box on the [CPF14 form](#) indicating that the complaint has been escalated should be completed and the name of the person the complaint has been escalated to added to the [CPF14 form](#).

7.27 The relevant Company Director will contact the complainant within two working days of being notified of the escalation to introduce themselves to the complainant and explain that they are now handling the complaint. In their initial communication with the complainant, the Company Director must:

- Assure the complainant that their complaint is being taken seriously and that Augean is making every effort to come to a resolution.
- Outline the particulars of the complaint and make it clear where the issue still persists.
- State that a decision on the actions to resolve the complaint will be made as soon as possible but no more than 10 working days from the date of the Company Director's initial communication with the complainant.
- Inform the complainant that Augean's final response will be made formally to them in writing.

7.28 The relevant Company Director shall examine the details of the complaint and the outcomes of the initial investigation and will then decide on the next steps to resolve the complaint. This could involve the following:

- Redoing parts or all of the original investigation (including redoing or starting an 8D investigation).
- Upholding the findings of the original investigation and their proposals for corrective or preventative actions.
- Proposing additional corrective and/or preventative actions to those outlined in the original investigation in an attempt to resolve the remaining issues with the complainant.

7.29 The investigation process and outcome of the escalated complaint (including any new corrective and/or preventative actions) must be recorded in the conclusions section of the [CPF14 form](#).



7.30 The relevant Company Director who is responsible for handling the escalated complaint will give a formal response to the complainant in writing. In this response to the complainant, it will be made clear that this is Augean's final position, and the complaint will be considered closed thereafter.

7.31 The relevant Company Director who is responsible for handling the escalated complaint will email the CPF14 report that they have completed to [REDACTED] email address.

## 8 CLOSURE

8.1 On completion of the complaint, a copy of the parts 1 and 2 completed [complaint form \(CPF14\)](#) must be sent to the HSEQ team at the [REDACTED] email and the ATMS action being set to 'Action Completed'. The HSEQ manager will then complete **Part 3** of the CPF14 report.

8.2 To complete Part 3 of the CPF14 report, the relevant HSEQ manager will review the effectiveness of the response to the complaint to ensure that there is independent oversight of the handling of the complaint. This will include reviewing the following:

- The effectiveness of the corrective and preventative actions proposed by the investigation.
- Whether the issues that were highlighted by the complaint investigation exist in other parts of the business and/or that the investigation has effectively taken action to address this.
- The level of compliance that the complaints investigation has had with this Standard Operating Procedure.
- The effectiveness of the root cause analysis conducted.

8.3 If the HSEQ manager or the HSEQ team are satisfied with findings of the complaints investigation and they are satisfied that the procedure has been followed correctly, a copy of the fully completed and signed off CPF14 Complaints form will be sent to the Communications Manager to be stored as a **record** on the Integrated Management System (IMS). The completed ATMS action for the complaint will be accepted by the HSEQ manager and closed out.

8.4 The HSEQ manager will return the [CPF14 form](#) to the person authorised for handling the complaint for further work if they are not satisfied with the approach taken and/or solutions proposed.

8.5 If the CPF14 report is returned the person authorised for handling the complaint, a full explanation will be provided by the HSEQ manager/team as to why and what further work must be done to complete the report. If the report is not accepted by the HSEQ manager or HSEQ team the completed ATMS action will be rejected and reopened, and further deadlines set for resolution. The relevant Company Director and the Director of Corporate Stewardship will also be notified. The process in 8.2 and 8.3 will be followed to close out the response to the remaining issues.

## 9 REPORTING

9.1 The number of completed complaints reports will be tracked on a monthly basis by the Communications Manager who will report to the relevant Director on a monthly basis.

9.2 Performance data will be used to evaluate against ISO 9001 system targets and results will be reported on an annual basis with our CSR report.