

**Verner Wheelock Associates Limited**  
**Non-conformance and Complaints Procedure**  
**04 January 2021**

At Verner Wheelock Associates Ltd we strive to continuously improve our service offering in all aspects of our business and we have implemented a Quality Management System that complies with ISO 9001. We continuously monitor all areas and ask for direct feedback from training courses and ethical audits which we use to enhance our business. We welcome feedback of any kind.

However, we recognise that there may be occasions when areas of our service fall below the required standards and have therefore developed a robust Non-conformance and Complaints Process that can be used by our customers, suppliers, business partners, associates and employees and have developed a flow chart to demonstrate the process for dealing with complaints.

**Confidentiality**

Any Non-conformance or complaint received through this process will be treated in the strictest of confidence as far as is possible. It will be thoroughly reviewed and assessed to ascertain that it is a credible claim; a credible claim is one that appears to have been made in good faith and if proven would constitute a violation of our Code of Conduct. A credible claim would then be fully investigated in a fair and consistent manner. If there is any misconduct proven through our investigation, then we will ensure that appropriate preventative and corrective action is taken. The subject of any investigation will be given the opportunity to be heard.

As a Company we take a zero-retaliation stance for those who raise complaints in good faith.

**Types of Complaints**

Complaints can fall into any category, but we identify some areas below that could lead to a complaint (this list is not exhaustive):

- Bribery and corruption
- Breach of confidentiality
- Failure to comply with GDPR
- Bullying and harassment
- Equal Opportunities and diversity
- Conflict of interest
- Poor levels of service
- Breach of our Code of Conduct

**Code of Conduct and Ethical Audits**

We ensure that all our Auditor partners are registered with APSCA (Association of Professional Social Compliance Auditors) and as such our Auditors adopt the APSCA Code of Conduct as well as our own Code of Conduct for Ethical Audits, which is available to view on our website ([www.vwa.co.uk](http://www.vwa.co.uk)).

A complaint that results in disciplinary action being taken against any of our Auditors will be reported to APSCA.

## **Appeals Process**

If a complaint has been received and the complainant is not satisfied with the outcome of our investigation and any subsequent action, then an Appeals process is in place. An Appeal under this process would need to be referred to the Managing Director of Verner Wheelock Associates Ltd and will be reviewed by our Board of Directors who have the ultimate decision-making authority in the event of an Appeal. An Appeal decision made by our Board of Directors is the final stage in our complaints process.

### **This document has been approved & authorised by:**

**Name:** Alison Wheelock

**Position:** Managing Director

**Date:** 04 January 2021

**Signature:**

A handwritten signature in black ink, appearing to read 'ASW', with a long horizontal flourish extending to the right.