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B-BBEE VERIFICATION AGENCY

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Policy

Accountants-on-Site (Pty) Ltd (hereinafter referred to as AOS) shall appropriately receive, evaluate, make decisions and provide feedback to clients on complaints, appeals and re-evaluations, lodged with AOS.

Purpose

The purpose of this policy is to ensure that AOS documents, and makes publicly available, its processes for receiving, evaluating and making decisions on complaints, appeals and re-evaluations in order to give confidence to clients that complaints, appeals and re-evaluations lodged will be appropriately addressed in a professional, timely and correct manner.

Objectives

AOS aims to address its responsibilities in respect of complaints, appeals and re-evaluations and to provide an outline of the process for receiving, validating and investigating complaints, appeals and re-evaluations, including decision-making on the actions to be taken in response to complaints, appeals and re-evaluations.

Detailed procedure for handling of complaints

1. Registration of complaints

Complaints relating to the activities of AOS must be submitted to the B-BBEE administrator in writing (using admin@a-o-s.co.za), from the first period of engagement up to 30 calendar days from the issuing of a B-BBEE certificate and report, using the AOSMP030 form, as publicly available on AOS' website. Clients are referred to the AOSMP030 form by the B-BBEE analyst, on the AOSMP022 verification plan and agenda, during the verification preparation process as per the AOSMP308 policy and procedure. Clients are again referred to the AOSMP030 form during the distribution of a B-BBEE certificate by the B-BBEE administrator, via email, to a client, all as recorded in the various client sub-folders on the server.

The B-BBEE administrator shall receive such complete and correct complaint, take ownership within 7 calendar days, including allocating a complaints reference number to the complaint (as recorded in our AOSMP013 record of complaints, appeals, re-evaluations and withdrawals) and communicate this to

the client in return writing. Take note that ownership will only be taken on receipt of complete and correct complaints, and timelines will only apply from receipt of such complete and correct complaints.

The B-BBEE administrator shall forward the complaint to an independent B-BBEE verification analyst who was not involved in the verification process of the measured entity, within the same 7 calendar days from receipt of such a complaint from the measured entity, via email, and inform the independent analyst of the required timelines and feedback to be provided to the measured entity.

We do not discriminate against any appellant, when an appeal is lodged, nor do we discriminate in our decision on appeals. Measured entities' minds are put at ease of this, at the bottom of the document they complete in lodging an appeal with the verification agency (AOSMP031).

We also buffer against possible discriminatory action, by distinguishing and isolating the various roles of the verification committee in the complaints and appeals processes clearly.

Measured entities may also appeal to SANAS, as a measure implemented by the verification agency – a transparent next step to problem solving in the effort to buffer possible discriminatory action by the verification agency.

2. Receipt, validity and investigation of complaints, including finalisation and response to complainant

Using our AOSMP030 form, the complaint shall include sufficient detail in order for an independent B-BBEE verification analyst to determine the purpose and scope of the complaint.

By the 14th calendar day of receipt of the correct and complete complaint by the measured entity, the B-BBEE administrator shall enquire from the independent B-BBEE analyst as to the progress of the appeal investigation and provide feedback to the measured entity on the progress via email.

By the 21st calendar day of receipt of the correct and complete complaint by the measured entity, the validity, nature, purpose and scope of such a complaint lodged by the measured entity, shall be investigated by the independent B-BBEE verification analyst, a root cause analysis and corrective action as per our AOSMP091 document shall be performed by the independent B-BBEE verification analyst, who will report findings and corrective action to B-BBEE administrator, using the AOSMP030 form.

By the 25th calendar day of receipt of the correct and complete complaint by the measured entity, the independent analyst will implement corrective action and report findings and corrective action to the B-BBEE administrator, on the AOSMP030 form attached to his/her email. This entire process shall be concluded, finalised and sent to the B-BBEE administrator within 25 calendar days of receipt of the complaint from the measured entity, by the B-BBEE administrator.

By the 30th calendar day of receipt of the correct and complete complaint by the measured entity, the B-BBEE administrator will communicate the complaint findings, on this AOSMP030 form, to the complainant, and advise the complainant of the opportunity to appeal against the report, including informing the complainant of the end of the complaints process, via return email.

Should the complaint process be successful, and the finding prescribes that a new certificate be issued, the certificate will be issued with a new version number (example from V1 to V2). In addition, the re-issued certificate will display the re-issue date, the original issue date as well as the original expiry date.

In the event that such complaints procedure cannot be resolved, the verification agency issues a notice of suspension of such B-BBEE verification by using our Notice of suspension of a B-BBEE verification form AOSMP088, in line with our policy on suspensions, withdrawals and re-instatement AOSMP089.

3. Procedure for ensuring appropriate action and corrective action

Provision for appropriate corrections and corrective actions are made in the complaints-handling procedure by AOS, as per process flows in this document.

Measured entities may appeal to SANAS at any time, for any matters that they feel appropriate corrections and corrective actions were not taken.

AOS will thus ensure appropriateness and corrective actions, as they are subject to an audit by SANAS in the event of such an appeal. Non-conformances may lead to verification suspension, which the verification agency is not prepared to compromise on.

All corrective actions are noted on the respective AOSMP030 form which is placed in each client file. The details of such accurately captured by our B-BBEE administrator on a master sheet AOSMP091 on the AOSMP013 database, where record is kept of all corrective actions, for training purposes to the B-BBEE analysts as part of our preventative actions.

Detailed Procedure for handling of Appeals

1. Registration of Appeals

Appeals relating to the activities of AOS must be submitted to the B-BBEE administrator in writing (using admin@a-o-s.co.za), from the first period of engagement up to 30 calendar days from the issuing of a B-BBEE certificate and report, using the AOSMP031 form, as publicly available on AOS' website. Clients are referred to the AOSMP031 form by the B-BBEE analyst, on the AOSMP022 verification plan and agenda, during the verification preparation process as per the AOSMP308 policy and procedure. Clients are again referred to the AOSMP031 form during the distribution of a B-BBEE certificate by the B-BBEE administrator, via email, to a client, all as recorded in the various client sub-folders on the server.

The B-BBEE administrator shall receive such complete and correct appeal, take ownership within 7 calendar days, including allocating an appeals reference number to the appeal (as recorded in the AOSMP013 record of complaints, appeals, re-evaluations and withdrawals) and communicate this to the client in return writing. Take note that ownership will only be taken on receipt of complete and correct appeal, and timelines will apply from receipt of such complete and correct complaint.

The B-BBEE administrator shall forward the appeal to an independent B-BBEE verification analyst who was not involved in the verification process of the measured entity, within the same 7 calendar days from receipt of such an appeal from the measured entity, via email, and inform the independent analyst of the required timelines and feedback to be provided to the B-BBEE administrator.

2. Receipt, validity and investigation of appeals, including finalisation and response to appellant

Using our AOSMP031 form, the appeal shall include sufficient detail in order for an independent B-BBEE verification analyst to determine the purpose and scope of the appeal.

By the 14th calendar day of receipt of the correct and complete appeal by the measured entity, the B-BBEE administrator shall enquire from the independent B-BBEE analyst as to the progress of the appeal investigation and provide feedback to the measured entity on the progress via email.

By the 21st calendar day of receipt of the correct and complete appeal by the measured entity, the validity, nature, purpose and scope of such an appeal lodged by the measured entity, shall be investigated by the independent B-BBEE verification analyst, a root cause analysis and corrective action as per our AOSMP091 document shall be performed by the independent B-BBEE verification analyst, who will report findings and corrective action to B-BBEE administrator, using the AOSMP031 form.

By the same 21st calendar day of receipt of the correct and complete appeal by the measured entity, the independent B-BBEE analyst shall submit to the independent Technical Signatory, a next applicable version scorecard and report for review and issuing (if applicable). Where no next version applies (i.e. no change in scores on any elements), this submission to the Technical Signatory is not applicable.

By the 25th calendar day of receipt of the correct and complete appeal by the measured entity, the independent Technical Signatory shall effect corrective action by means of issuing of the next version number of the applicable B-BBEE certificate and report, if changes apply, to the B-BBEE administrator for distribution to the client, in conjunction with the findings on the appeal from the independent B-BBEE analyst, as received via email.

By the 30th calendar day of receipt of the correct and complete appeal by the measured entity, the B-BBEE administrator will communicate appeal findings on the AOSMP030 to the appellant, including distributing the next version number of the B-BBEE certificate and report (if applicable) on the same email, and advise the appellant of the opportunity to appeal against the report, to SANAS, including informing the appellant of the end of the appeals process, in this same email.

Where special circumstances form part of the findings reports of an appeals application, as recorded by the B-BBEE analyst on the AOSMP031 form and signed off by the Technical Signatory in the issuing of the next number certificate, the Technical Signatory shall instruct the B-BBEE administrator, via email, within the same timelines above, to follow the additional procedures as set out in this document. Confirmation of the instruction and its action taken, shall be saved in the applicable electronic client file, under the appeals folder on the server. The independent Technical Signatory must review all elements (non-appealed and appealed) before signing off the certificate.

Should the appeal process be successful, and the finding prescribes that a new certificate be issued, the certificate will be issued with a new version number (example from V1 to V2). In addition, the re-issued certificate will display the re-issue date, the original issue date as well as the original expiry date.

Special circumstances

Where the findings report on an appeal application, as recorded by the B-BBEE analyst on the AOSMP031 form, and signed off by the Technical Signatory in the issuing of the next number certificate, reflects any of the following changes:

- B-BBEE recognition levels; or
- change in the percentage black ownership; or
- change in black female ownership; or
- change in black designated group ownership; or
- any impact on the points and targeted levels.

Represented on the face of the certificate and verification report, the verification agency shall follow the additional procedures as set out below.

Additional procedures applicable to special circumstances

Where special circumstances formed part of an appeals findings report as recorded by the B-BBEE analyst on the AOSMP031 form and signed off by the Technical Signatory in the issuing of the next number certificate, the following additional procedures shall apply. Within 30 calendar days of receipt of the correct and complete appeal by the measured entity, which reflected special circumstances met, as determined by the independent Technical Signatory in the issuing of the next version B-BBEE certificate and report, in the distribution folder, to the B-BBEE administrator:

- The B-BBEE administrator shall inform the responsible person at the measured entity, whose B-BBEE certificate AOS re-issued, via email, that AOS formally withdraws its previous B-BBEE certificate version issued and replaces it with the new B-BBEE certificate version issued, as issued via email by the B-BBEE administrator.
- The B-BBEE administrator shall inform the responsible person at the measured entity, whose B-BBEE certificate AOS re-issued, via email, to refrain from circulating and using their previously issued B-BBEE certificate, and only use the newly re-issued B-BBEE certificate as issued via email by the B-BBEE administrator.
- The B-BBEE administrator shall inform all the accredited SANAS verification agencies holding valid compliance statuses at the time, as published on the SANAS website at the date of the re-issuing of the applicable B-BBEE certificate, via email, of the updated valid B-BBEE certificate version issued by AOS, and provide a copy thereof to such, via email. Proof of this communication shall be kept in the electronic client file, in the appeals folder, kept on the server.

Detailed Procedure for handling of Re-evaluations

1. Registration of re-evaluations

Re-evaluations relating to the activities of AOS must be requested from and submitted to the B-BBEE administrator in writing (using admin@a-o-s.co.za), using the AOSMP258 form.

The B-BBEE administrator shall receive such complete and correct re-evaluation form, together with a new complete, correct, signed off claim, complete evidence supporting the claim, and take ownership within 7 calendar days, including allocating a re-evaluations reference number to the re-evaluation (as recorded in the AOSMP013 record of complaints, appeals, re-evaluations and withdrawals) and communicating this to the client in return writing. Take note that ownership will only be taken on receipt of complete and correct re-evaluations, who hold complete and correct signed off claims and all supporting evidence to claims, and timelines will only apply from receipt of this.

The B-BBEE administrator shall forward the re-evaluation to the same B-BBEE verification analyst who was involved in the original verification process of the measured entity, within the same 7 calendar days from receipt of such a re-evaluation from the measured entity, via email, and inform the B-BBEE verification analyst of the required timelines and feedback to be provided to back to the B-BBEE administrator.

2. Receipt, validity and investigation of re-evaluations, including finalisation and response to re-evaluations applicant

Using the AOSMP258 form, the re-evaluation shall include sufficient detail, a signed off unofficial claim and all supporting evidence, in support of claims, in order for an independent B-BBEE verification analyst to determine the purpose and scope of the re-evaluation.

By the 14th calendar day of receipt of the correct and complete re-evaluation by the measured entity, the B-BBEE administrator shall enquire from the B-BBEE analyst as to the progress of the re-evaluation and provide feedback to the measured entity on the progress, via email.

By the 21st calendar day of receipt of the correct and complete re-evaluation by the measured entity, the validity, nature, purpose and scope of such a re-evaluation lodged by the measured entity shall be processed by the B-BBEE verification analyst, who will report findings and corrective action to the B-BBEE administrator, using the AOSMP258 form.

By the same 21st calendar day of receipt of the correct and complete re-evaluation by the measured entity, the B-BBEE analyst shall submit to the same original Technical Signatory, a next applicable version scorecard and report for review, and issuing (if applicable). Where no next version applies (i.e. no change in scores on any elements), this submission to the Technical Signatory is not applicable.

By the 25th calendar day of receipt of the correct and complete re-evaluation by the measured entity, the same original Technical Signatory shall effect corrective action by means of issuing of the next version number of the applicable B-BBEE certificate and report, if changes apply, to the B-BBEE administrator for distribution to the client, in conjunction with the findings on the re-evaluation from the B-BBEE analyst, as received via email.

By the 30th calendar day of receipt of the correct and complete re-evaluation by the measured entity, the B-BBEE administrator will communicate the re-evaluation findings, on the AOSMP258 to the re-evaluations applicant, including distributing the next version number of the B-BBEE certificate and report (if applicable) on the same email, and advise the re-evaluations applicant of the opportunity to appeal against the report, including informing the re-evaluations applicant of the end of the re-evaluations process, in this same email.

Where special circumstances form part of the findings reports of a re-evaluations application, as recorded by the B-BBEE analyst on the AOSMP258 form and signed off by the Technical Signatory in the issuing of the next number certificate, the Technical Signatory shall instruct the B-BBEE administrator, via email, within the same timelines above, to follow the additional procedures as set out in this document. Confirmation of the instruction and the action taken shall be saved in the applicable electronic client file, under the complaints and appeals folder on the server.

Should the re-evaluation process be successful, and the finding prescribes that a new certificate be issued, the certificate will be issued with a new version number (example from V1 to V2). In addition, the re-issued certificate will display the re-issue date, the original issue date as well as the original expiry date.

Special circumstances

Where the findings report on an appeal application, as recorded by the B-BBEE analyst on the AOSMP258 form, and signed off by the Technical Signatory in the issuing of the next number certificate, reflects any of the following changes:

- B-BBEE recognition levels; or
- change in the percentage black ownership; or
- change in black female ownership; or
- change in black designated group ownership; or
- any impact on the points and targeted levels.

Represented on the face of the certificate and verification report, the verification agency shall follow the additional procedures as set out below.

Additional procedures applicable to special circumstances

Where special circumstances formed part of a re-evaluation findings report as recorded by the B-BBEE analyst on the AOSMP258 form and signed off by the Technical Signatory in the issuing of the next number certificate, the following additional procedures shall apply. Within 30 calendar days of receipt of the correct and complete re-evaluation by the measured entity, which reflected special circumstances met, as determined by the same original Technical Signatory in the issuing of the next version B-BBEE certificate and report, in the distribution folder, to the B-BBEE administrator:

- The B-BBEE administrator shall inform the responsible person at the measured entity, whose B-BBEE certificate AOS re-issued, via email, that AOS formally withdraws its previous B-BBEE certificate version issued and replaces it with the new B-BBEE certificate version issued, as issued via email by the B-BBEE administrator.
- The B-BBEE administrator shall inform the responsible person at the measured entity, whose B-BBEE certificate AOS re-issued, via email, to refrain from circulating and using the previously issued B-BBEE certificate, and only use the newly re-issued B-BBEE certificate as issued via email by the B-BBEE administrator.
- In the event that the revised certificate has a lower B-BBEE recognition level or Black Ownership percentage, the B-BBEE administrator shall inform all the accredited SANAS verification agencies holding valid compliance statuses at the time, as published on the SANAS website at the date of the re-issuing of the applicable B-BBEE certificate, via email, of the updated valid B-BBEE certificate version issued by AOS, and provide a copy thereof to such, via email. Proof of this communication shall be kept in the electronic client file, in the complaints and appeals folder, kept on the server.

Records

Electronic evidence shall be kept by the B-BBEE administrator, of all completed AOSMP030 forms, all completed AOSMP031 forms, and all completed AOSMP258 forms; all communicate between AOS and the client, using our folders clearly marked as appeals, inserting all forms and communicate in these folders, as sub-folders. A tracking tool shall be kept of all complaints, appeals, re-evaluations and withdrawals, including dates, contact persons dealt with, appeal/complaint/re-evaluation reference numbers, and a summary of such content, on the WIP database (AOSMP013), cross-referencing back to the folders assigned.

Evidence shall be backed up daily, on the AOS external hard drive, by the Technical Signatory, locked away in a safe at AOS' premises, the key of which is held by the Technical Signatory.

Scope

This policy and procedure are applicable to the B-BBEE administrator, the two independent B-BBEE verification analysts who were not involved in the verification process that is the subject of the appeal or complaint, and/or the independent B-BBEE verification manager and Technical Signatory who was not involved in the verification process that is the subject of the complaint or appeal and the Board of Directors of AOS.

Ensuring the effectiveness of the policy and procedure

The B-BBEE administrator, the two independent B-BBEE verification analysts who were not involved in the verification process that is the subject of the appeal or complaint, the independent B-BBEE verification manager, who was not involved in the verification process that is the subject of the complaint or appeal, the independent Technical Signatory and the Board of Directors of AOS. will receive a copy of this policy and procedure to be followed. The policy will be reviewed annually and amendments will be implemented by the Technical Signatory. Should the Technical Signatory identify a need for review during the management review process, using the management review policy and procedures (AOSMP001) and the management review template (AOSMP017), such reviews will be implemented by the Technical Signatory.

Acknowledgment of Receipt of Policy and Procedure

I acknowledge that I have received this Policy and Procedure document. I understand that it is my duty to read said document, and to comply with the policy and procedure contained herein.