Quick Summary

Complaints represent one of the most important information sources for any food safety management system. They provide a food business with the opportunity to identify emerging or existing problems and take actions early to prevent a crisis.

This whitepaper covers the essential elements of an effective complaints handling procedure as required under the GFSI and retailers’ technical standards. It sets out best practice with practical examples of how the requirements can be met.

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1  THE NEED FOR AN EFFECTIVE COMPLAINTS HANDLING SYSTEM

Most managers responsible for food safety dread a customer complaint. Whether it is received directly from the consumer or from a retail customer, it represents in their minds, a failure of their food safety management system. In the worst case scenario it can trigger a crisis management situation leading to a recall or withdrawal of product from the market. Complaints can be costly leading to a loss of business and customer confidence. In many ways, customer complaints are one of the more obvious indications that improvement can be achieved and this responsibility usually falls to the food safety manager.

At the same time, complaints are a fact of life for any food business. They are practically unavoidable. A food process, like any other process, experiences variation and other failures which can lead to complaints. While accepting this reality we should never be comfortable with it. As people producing food for consumption we should always maintain a reasonable level of discomfort regarding process variation and the resultant issues. This is the basis upon which we build a culture of dealing with complaints professionally. Core to this is the complaints handling procedure and the supporting management practices that ensure we maintain complaints at acceptable levels, address critical complaints correctly, protect public health and embrace continuous improvement.

The objective of any food safety management system is protection of the health of the consuming public. This is driven by the legal, commercial and moral obligations of the food business not to cause harm, injury or death to any individual who consumes its products. Food safety management is an effective tool in meeting these obligations. As is the cause with any management system the identification, collection and analysis of data is essential to allow decisions to be made and actions taken. When it comes to the safe production of food any data which indicates a real or pending failure in control is enormously valuable. Customer complaints are one such data source that provides the management systems with high quality information necessary for effective control and to generate improvement in food safety programs.

An effective complaints handling system will comprise the following:

- Policy and complaints handling procedure
- Clear identification of all possible complaint sources
- Complaint capturing
- Investigation and root cause analysis
- Corrective action
- Complaint trending and analysis
- Continual improvement

The above elements are typically required to meet the specific requirements of the multiple food retailers and other customers. The system is focused on maximising the value of the data collected, ensuring it is accurate and feeds into a process designed to determine the actual cause, take actions to address the customer’s immediate concerns and prevent the reoccurrence. Further to this the above approach requires that more detailed analysis of the general body of complaints data is analysed and used as the basis for on-going improvements.
2 GFSI REQUIREMENTS FOR COMPLAINTS HANDLING

The Global Food Safety Initiative’s (GFSI) group of approved schemes set out very prescriptive requirements for the handling of customer complaints. Below we have examined three of these schemes.

2.1 BRC Issue 6 Requirements

“Customer complaints shall be handled effectively and information used to reduce recurring complaint levels.”

<table>
<thead>
<tr>
<th>Clause</th>
<th>Requirements</th>
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<tbody>
<tr>
<td>3.10.1</td>
<td>All complaints shall be recorded, investigated and the results of the investigation and root cause of the issue recorded where sufficient information is provided. Actions appropriate to the seriousness of the problems identified shall be carried out promptly and effectively by appropriately trained staff.</td>
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<td>3.10.2</td>
<td>Complaint data shall be analysed for significant trends and used to implement ongoing improvements to product safety, legality and quality and to avoid recurrence. This analysis shall be made available to relevant staff.</td>
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The following are the specific requirements for complaints handling under certification to the BRC standard and are found in clause 3.10.

Under BRC the company must have in place an effective complaints handling procedure capable of capturing information on complaints which is then used to identify the cause and the appropriate actions to prevent recurrence. The second element of the requirements goes on to analyse this data in such a way that on-going improvements in complaint performance is achieved. Complaint handling is not a fundamental requirement of the standard; however, it remains a critical component of management’s toolbox for achieving safe food production.

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<td>2.1.5 Complaints Management</td>
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<td>2.1.5.1 The methods and responsibility for handling and investigating the cause and resolution of complaints from customers and authorities shall be documented and implemented.</td>
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2.2 SQF Code 7 Requirements

The above table shows the specific requirements for complaints management as required under the SQF Code 7. These requirements may be found under section 2.1.5 of the Code.

Requirements under SQF start with the need to document responsibilities and the procedure for handling and investigating complaints. Again we also find the requirement to trend and analyse complaint data and for corrective actions to be taken based on the seriousness of the issue. In the case of the SQF standard there is no specific mention of root cause analysis; however, this should not prevent the company from adopting this approach. Finally, there is a requirement to maintain records for all complaints and subsequent investigations.

2.3 IFS Standard Requirements

<table>
<thead>
<tr>
<th>Clause</th>
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<tr>
<td>5.8.1</td>
<td>A system shall be in place for the management of product complaints.</td>
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<td>5.8.2</td>
<td>All complaints shall be assessed by competent staff. Where it is justified appropriate actions shall be taken immediately, if necessary.</td>
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<td>5.8.3</td>
<td>Complaints shall be analysed with a view to implementing preventive actions which avoid the recurrence of the nonconformity.</td>
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<tr>
<td>5.8.4</td>
<td>The results of complaint data analysis shall be made available to the relevant responsible persons and to the senior management.</td>
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</table>

The following are the specific IFS requirements for the management of complaints from authorities and customers. These requirements may be found in clause 5.8.

The requirements of the IFS standard demand a system to be established for the management of complaints. In this standard the importance of ‘authorities’ is highlighted. The standard also requires that competent staff assess complaints and drive actions. Once again we see the importance of analysis of complaints to avoid recurrence.

3 COMPLAINTS POLICY AND PROCEDURE

The first step in putting in place an effective complaints handling system is to clearly define your complaints policy and procedure. This should be documented and cover all the elements as previously described. The policy should be consistent with legal and commercial requirements and sufficient to ensure consumer protection. The policy should describe the management’s comment to the customer and application of resources to support the complaints handling processes. The procedure should define in detail the steps to be followed in handling complaints and include complaint capturing, investigation, analysis, recording and reporting. It may be linked to other relevant procedures such as:

- Management review
- Corrective actions
- Crisis and incident management (recalls and withdrawals)

The policy and procedure should indicate the criteria that would trigger a review of complaint performance. For example, a certain number of complaints linked by complaint type, product or production line might trigger a review.
The following is an example of what a complaint handling policy and procedure might look like:

Quality & Food Safety Manual

Complaints Handling

1.0 Methodology

1.1 On receipt of a complaint from a customer, the recipient will either pass the complaint directly on to the Quality Manager or take detailed notes of the complaint and pass this on to the Quality Manager.

1.2 The Quality Manager, using the Complaints Module in Safefood 360, will record the details of the complaint on a Customer Complaint Record, which will be assigned a unique reference number by the system. Any written documentation provided by the customer shall be attached to this Record.

1.3 Where required, the Quality Manager on behalf of the Company will send a standard letter of acknowledgement to the customer. This will not contain any report on the cause of the non-conformance.

1.4 The details recorded on the Customer Complaints Record shall include the following:

- Customer Details
- Consumer Details
- Product Details including traceability information
- Complaint and non-conformance category

Where practical, arrangements shall be made by the Quality Manager to collect the sample for investigation.

1.5 Complaint Risk Assessment

1.5.1 Complaints are classified as high, medium or low risk.

1.5.2 High and Medium Risk Complaints: These are complaints relating to products which if consumed by the customer may cause illness, injury or death.

1.5.3 Low Risk Complaint: This is a complaint in relation to the quality and appearance of the product which does not pose a risk to the consumer. The following are examples of what would constitute High, Medium and Low risk complaints.

<table>
<thead>
<tr>
<th>High / Medium</th>
<th>Low</th>
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<tbody>
<tr>
<td>Metal Contamination</td>
<td>Damaged packaging, label etc</td>
</tr>
<tr>
<td>Physical Contamination: Glass, Plastic, Wood, Insects etc</td>
<td>Quality Issues such as off taste, colour, etc</td>
</tr>
<tr>
<td>Pathogenic Contamination</td>
<td>Packaging print quality</td>
</tr>
<tr>
<td>Chemical Contamination</td>
<td>Incorrect quantity in bottle</td>
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<tr>
<td>Allergen Contamination</td>
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</table>
2.0 Standard

2.1 All complaints received from any source shall be recorded.

2.2 All complaints shall be investigated consistent with the level of risk and corrective action taken. All complaints shall be presented to management for review and used as a basis for improvement.

3.0 Corrective Action

3.1 Corrective Action – High / Medium Risk Complaints

3.1.1 Upon receipt of the product, the Quality Manager shall make a determination as to the risk of the complaint.

3.1.2 High and Medium Risk complaints or Low Risk complaints which are part of an emerging trend shall trigger an investigation to determine the source of the non-conformance. Details of this investigation should be documented on the related Corrective Action record. For high / medium risk complaints the source and impact of the complaint must be determined. Where required, the Quality Manager may seek external assistance from consultants, department officials or laboratories in the identification of the complaint, the risk involved and the action required.

3.1.3 For high risk complaints, the Quality Manager shall consider a product recall, where the risk is deemed to be real and serious. Refer to product recall procedure.

3.2 Corrective Action – Non-Critical Complaints

3.2.1 Low risk complaints should all be logged as per the above procedure and a letter of explanation detailing corrective / preventive action taken will be sent directly to the customer by the Quality Manager. This is to ensure that feedback is given to all parties concerned.

3.3 Monitoring & Reporting

3.3.1 Each month at one of the weekly production meetings, the Quality Manager shall present details of any complaints received during that month. The Quality Manager shall ensure that sufficient information is communicated to relevant staff members to allow for effective investigation and corrective action.

3.3.2 The Quality Manager shall also prepare a report annually, which will be presented to the Management Review Team. It shall include the following:

- Total Number of Complaints
- Trend Analysis of Complaints against previous performance and targets
- Complaints per ‘000
- Complaints by Type (Pareto)

3.3.3 This will provide a basis for setting targets and objectives for the coming year.

4.0 References & Records

This procedure should form part of your food safety management system and be audited and reviewed to ensure it remains in place and effective.

_Safefood 360 Customer Complaints Module_
4 COMPLAINT SOURCES

Complaints from all sources should be covered in your procedure. This is important to ensure that your system captures the maximum information and that no party or stakeholder is neglected in the management of issues, concerns, feedback, or legality. Sources may include the following:

- Consumers who are the final users of your products
- Customer representatives from retailers or contract customers
- Retail stores retailing your products
- Central buying departments
- Wholesale and distribution centres
- Retailer customer complaints departments
- Law enforcement bodies, authorities and agencies
- Internal departments, e.g. operational departments
- Output from quality assurance processes, e.g. taste panels

It is usually good practice to define the scope of sources where a complaint should be captured. This will allow for analysis of complaints by source type.

5 COMPLAINT CAPTURING

Your internal complaints procedure will define how complaint information and data is captured when received. Complaints may be received from a number of methods including:

- Post
- Telephone
- Email
- Personal visit
- Via company representatives

Regardless of the actual method of receipt it is important to give some consideration to how practically complaint data is captured to ensure resources are applied efficiently and you gain the maximum benefit from each complaint received. A number of approaches and systems may be employed to capture complaint data. These approaches are presented in more detail in a table that is on the next page.

An effective complaints handling system will usually have two main elements for capturing complaint information - the complaints log and complaint form.

5.1 Complaint Log

The best way to approach the capturing of complaint information is to maintain a log based on a standard complaints capturing form. The log itself should be based on a unique reference number for each individual complaint. Below is an example of how a complaints log might appear.
Complaints handling under GFSI

Safefood 360º Whitepaper (January, 2013)

Generally, a complaint log should indicate some basic information including:

- Unique reference number
- Date
- Product
- Customer
- Complaint nature
- Risk

<table>
<thead>
<tr>
<th>System</th>
<th>Description</th>
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<tr>
<td>Manual paper systems</td>
<td>In this approach the company uses a standard paper form to record details of each complaint received. It is a manual process and requires users to collect and collate the data to meet requirements for trending and analysis. These systems can be quick and inexpensive to set up, do not require much training but can lead to significant variation in the data recorded and the time required to analyse and trend it.</td>
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<td>Spread sheets and in-house databases</td>
<td>These systems employ standard software applications such as MS Excel and Access. The recording system can be developed internally by IT and non-IT staff and can be used to standardise the capturing of data and assist in report development. These systems are an advance on manual paper systems and reduce the time required to produce trend reports and data analysis. They may require some expertise in the software to develop a system but can also be limited in terms of meeting specific requirements.</td>
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<tr>
<td>Specialised complaint management software solutions</td>
<td>These are specialised software packages designed specifically to handle the capturing and processing of complaint data. They automate much of the processes and workflows required for effective complaint management and can produce high quality reports on demand. These systems range from generic solutions designed for all sectors to industry specific solutions for food safety management. They can vary widely in terms of costs and the consultancy required for their set-up and maintenance.</td>
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</table>
5.2 Complaints Form

The complaints form is usually a standard controlled form which captures the finer detail of the complaint. It should be used in all cases by any member of staff with responsibilities in the complaint procedure. Staff should be trained in the completion of the form in order to reduce variation and errors. The form should be developed by a senior manager or group of senior managers to ensure it meets the requirements of customers, regulatory inspectors, food safety standards and other functions within your business, e.g. sales. The data captured in the standard form should also facilitate easy collation for trending and reporting. This is particularly important where a paper manual system is being used. There are certain data that should always be collected when a complaint is being recorded. This should start with basic information on the customer and/or the consumer.

Picture: Sample Complaints Form (Customer & Consumer Details)

This basic information can be expanded to include the source of the complaint, method of receiving and details of sample request and collection where relevant. Remember to always include a unique reference number and date of receipt. The system should also record the name of the person logging and recording the complaint. The next section of the complaint form should capture as much detail as possible on the product to which it relates. Product information should include Product Name, Date of Manufacture, Durability Date, Lot or Batch Number, Brand and Line.

Finally, information should be recorded on the complaint itself. The more information recorded the better. Two key items of information are important. The first is the specific non-conformance, e.g. ‘Foreign Matter – Glass’. This is important to support trending and analysis later on. Second is a detailed description of the complaint. All information provided by the source should be recorded including the circumstance under which the complaint was detected, alleged impacts on the consumer and any other relevant information. It is essential that sufficient information is gathered about the complaint. Where this information is not available attempts should be made to gather more from the source.
This should include return of the complaint sample if possible. Initial Action following capturing of complaints include:

- Sample receipt and preservation
- Initial risk assessment and categorisation of the complaint
- Acknowledgment of complaint to customer or consumer

5.3 Complaint Categories

In order to correctly identify trends in complaints it is essential that the system is built on clearly defined categories. Categories should be defined for:

- Product non-conformances
- Brands
- Production Lines / Sources
- Product types

Non-conformances should be categorised according to risk to trigger the appropriate responses, actions and times. For example, complaint non-conformances may be categorised as High, Medium or Low risk or as Critical or Noncritical. In manual systems, categories should be defined in a register and be available to those completing forms. In automated systems these can be set up in a database.
Following the proper capturing of the complaint information you should then commence a work flow designed to investigate the complaint and identify the root cause of the issue. Recent revisions to the GFSI have seen the introduction of root cause analysis to ensure that resultant corrective actions are focused on preventing a recurrence. Root cause analysis attempts to distil the issue down to its actual cause. There are various tools and techniques that can be employed to conduct effective root cause analysis which can be found in a specific whitepaper on the subject. Again the GFSI standards define how issues should be investigated. The following example shows a workflow that may be employed to meet these requirements.

6 COMPLAINT INVESTIGATIONS AND CORRECTIVE ACTION

6.1 Investigation and root cause analysis

Following the proper capturing of the complaint information you should then commence a work flow designed to investigate the complaint and identify the root cause of the issue. Recent revisions to the GFSI have seen the introduction of root cause analysis to ensure that resultant corrective actions are focused on preventing a recurrence. Root cause analysis attempts to distil the issue down to its actual cause. There are various tools and techniques that can be employed to conduct effective root cause analysis which can be found in a specific whitepaper on the subject. Again the GFSI standards define how issues should be investigated. The following example shows a workflow that may be employed to meet these requirements.
All complaints must be investigated in detail by competent personnel. The investigation must determine whether the complaint is product specific or an issue which may affect more than one product: Foreign Bodies, Alleged Illness, Taste, Quality, Correct Quantity, etc. Full records must be kept and the outcome of the investigation promptly reported to relevant personnel and departments. All instances of foreign body contamination, alleged illness and trends need to be investigated. Isolated incidences where a customer doesn’t like the taste or there is a quality perception issue may not require a full investigation; however, they do need to be monitored.

Picture: Investigation and Root Cause Analysis

6.2 Corrective Actions

Corrective actions should always depend on the seriousness of the issue. For serious issues the actions taken should be timely and sufficient to prevent or reduce the impact of the issue on the consumer. In some cases this will require a product recall. Actions should also be focused on preventing a recurrence of the complaint and this can be facilitated by an analysis of the root cause. Actions should be defined clearly with responsibility assigned to a competent person with the authority to affect the required work or change. Deadlines should be set and agreed. Records of the action should be maintained including the completion date. All actions should be reviewed for effectiveness and closed out formally.

Picture: Corrective Action Workflow
6.3 Handling serious complaints

Serious complaints should be handled in a manner appropriate for their impact. Your procedure should define how they are handled and should address the following:

- Timelines for investigation, analysis and corrective workflows
- Complaints where there is likely or actual threatened litigation
- Risk assessment and the necessity for a product recall / withdrawal
- Obligations for the notification of the issue to customers and regulatory authorities

6.4 Responding to the complainant

The complaints handling procedure should address how the complainant is responded to depending on the nature and seriousness of the issue. It is good practice to always inform the complainant of the outcome of investigations and corrective actions and where there is a protracted timeline in the workflow they should be notified of this and given regular updates on any progress.

7 COMPLAINT MONITORING & TRENDING

As part of your complaints handling procedure, complaint trends should be monitored. This can include complaint numbers which can be tracked against units sold and complaint type. It is good practice to build into your system a requirement that an increase in complaints must prompt an investigation. You can set targets and have a plan in place to reduce complaint levels in general and for worst offending categories/products.

Information from trend analysis of complaints should be communicated to the site management and production teams where appropriate. Complaint trend information can also be graphically displayed on suitable notice boards at site access points to ensure staff are always aware and up to date on complaints being received. Examples of complaints may also be displayed to increase awareness, e.g. foreign bodies. Mechanisms should be in place for briefing and discussing preventative action with production teams including works and employee meetings held on a scheduled basis. The following are examples of how complaint data may be trended and presented.

Picture: Top 10 Complaints
Most of the GFSI standards require a food business to use the information collected from complaints to be used to drive continuous improvement. This is achieved by feeding the data into the food safety management system and management effecting change. Practically, this is achieved as follows:

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<tr>
<th>System</th>
<th>Description</th>
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<tbody>
<tr>
<td>Policy</td>
<td>Complaints policy should be reviewed by management to ensure it remains capable of effecting improvement in complaint performance.</td>
</tr>
<tr>
<td>Objectives</td>
<td>The site must set targets and have a plan in place to reduce complaint levels in general and for worst offending categories/products.</td>
</tr>
<tr>
<td>Management Review</td>
<td>Management should review complaint data and trends to identify areas where improvement is required and can be achieved.</td>
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8 CONTINUOUS IMPROVEMENT
Product Benefits

- Easily record and manage all elements of your food safety system including HACCP and CCP monitoring, PRP's, management systems and documents
- Eliminate paper using the 30 integrated modules that come as standard
- Access and work with your system from any location at anytime
- Stay up to date and fully compliant with software that updates automatically in line with changes to global food standards
- Improve compliance and audit outcomes through the action driven features of the software
- Accelerate compliance with all of the international food safety standards including the BRC, SQF, IFS & FSSC 22000.
- Spend less time managing your food safety system and more on value adding activities

Product Features

- Dashboards & KPI’s
- 100’s of reports as standard
- Notifications
- Multi-site management & oversight
- Real-time legal and alert updates to dashboard
- Roles & security
- Actions management
- Safe and secure web based solution
- No internal IT support or data back-up required
- Unlimited Users
- 24/7 world class customer support
- Covers in complete detail the requirements of the SQF, BRC, IFS, FSSC 22000, retailer standards and legislation
- FDA 21 CFR Part 11 –Technical Compliance
- Automatic audit log
- One click data export