Third Party Complaints Policy & Procedure

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Author: COMPLIANCE
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Policy

It is the policy of Maritime Asset Security & Training (MAST) (Company) to provide third parties[1] with a mechanism to report allegations of improper and/or illegal conduct to designated personnel.

2.0 Procedure

The procedure seeks to create a positive approach to complaints.

(i) The procedure will be published on a publically accessible website;

(ii) The Company will keep copies of documents generated as a result of the complaint and record of any action taken. Except where prohibited or protected by applicable law, the finding of the complaint will be made available to a Competent Authority on request;

(iii) The Company will co-operate with any official investigations;

(iv) The Company will take appropriate disciplinary action in the case of finding such a violation or unlawful behaviour;

(v) The Company will ensure that any personnel working for the Company who makes a complaint is protected from any reprisals.

[1] Third Parties include but are not limited to: External bodies, companies, clients, independent contractors such as security personnel providing services to the Company. This is not an exhaustive list.

The procedure does not confer any contractual rights. The Policy and Procedure may be subject to revision from time to time.

3.0 Responsibility and authority

Board of Directors is responsible for:

a) ensuring that the complaints handling process and objectives are established within the organization;
b) ensuring that the complaints handling process is planned, designed, developed, operated, maintained and continually improved in accordance with the complaints-handling policy of the organization;
c) identifying and allocating the management resources needed for an effective and efficient complaints handling process;
d) ensuring the promotion of awareness of the complaints handling process and the need for a customer focus throughout the organization;
e) ensuring that information about the complaints handling process is communicated to customers, complainants, and, where applicable, other parties directly concerned in an easily accessible manner;
f) appointing a complaints-handling management representative and clearly defining their responsibilities and authority;
g) ensuring that there is a process for rapid and effective notification to top management of any significant complaints;
h) periodically reviewing the complaints-handling process to ensure that it is effectively and efficiently maintained and continually improved.

3.1 Management Representative for Complaints Handling

Board of Directors have appointed HR to manage Complaints. HR shall update Compliance about the progress and finalisation of each compliant in progress.
The scope of duties cover:

a) establishing a process of performance monitoring, evaluation and reporting;

b) reporting to top management on the complaints handling process, with recommendations for improvement;
c) maintaining the effective and efficient operation of the complaints-handling process, including the recruitment and training of appropriate personnel, technology requirements, documentation, setting and meeting target time limits and other requirements, and process reviews.

3.2 Heads of Departments

All Heads of Departments are responsible for complaints handling process within their area of responsibility, including:

a) ensuring that the complaints handling process is implemented;
b) liaising with the complaints handling management representative;
c) ensuring the promotion of awareness of the complaints handling process and of the need for a customer focus;
d) ensuring that information about the complaints-handling process is easily accessible;
e) reporting on actions and decisions with respect to complaints handling;
f) ensuring that monitoring of the complaints handling process is undertaken and recorded;
g) ensuring that action is taken to correct a problem, prevent it happening in the future, and that the event is recorded;
h) ensuring that complaints handling data are available for the top management review.

3.3 All personnel in contact with customers and complainants:

a) is trained in complaints handling;
b) is required to comply with any complaints-handling reporting requirements determined by the organization;
c) treats customers in a courteous manner and promptly respond to their complaints or direct them to the appropriate individual;
d) shows good interpersonal and good communication skills.

All personnel is:

a) made aware of their roles, responsibilities and authorities in respect of complaints;
b) made aware of what procedures to follow and what information to give t complainants;
c) made aware of report complaints which have a significant impact on the organization.

4. How to Complain

Complaint is defined as an "expression of dissatisfaction made to an organization, related to its products, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected".

All complaints must be made in writing directly to the Company.

Complaints should be made within reasonable time of the Complainant becoming aware of the grounds for complaint.

Complaints can be sent as follows via:

- Maritime Security: Email to – operations@mast-security.co.uk
- MAST Guarding: Email to - admin@mast-security.co.uk
- Letter to – MAST, 1 St Andrews Hill, London, EC4V 5BY, UK

Any complaint made under this procedure should include:

- Contact details of the Complainant (including postal and e mail address).
- The subject of the complaint.
- Information and evidence regarding the alleged breach.

Please see Complaint Form attached to this procedure. MAST would encourage to use the attached form, however it is not obligatory. Using MAST form, which contains the principal information, can aid a complainant to provide us with the key details required to handle the complaint effectively and efficiently.

The Company will acknowledge receipt of the complaint within ten working days and advise who will be responsible for dealing with the complaint.

Anonymous complaints will be investigated where possible and may be acted upon at the Company's discretion.

All complaints shall be registered in the non-compliance register.

2.2 Handling of the Complaint

The Company is committed to ensuring that all complaints are investigated fully and impartially and with due consideration for confidentiality.

Each complaint should be addressed in an equitable, objective and unbiased manner through the complaints handling process.

Personally identifiable information concerning the complainant should be available where needed, but only for the purposes of addressing the complaint within MAST and should be actively protected from disclosure, unless the customer or complainant expressly consents to its disclosure or disclosure is required by law.

MAST has a 4-stage complaints procedure. At each stage it will help us to resolve your complaint quickly if you can give us as much clear detail as possible, including any documents and correspondence and stating that you are making a complaint in line with our procedure.

The stages of the complaints procedure:

Stage 1
This is the first opportunity for the department involved to resolve a complainant's dissatisfaction, and the majority of complaints will be resolved at this stage. In the first instance, we will try to get your complaint resolved by Manager of the department against whom the complaint has been made. Upon receipt of your complaint the relevant Manager will be contacted and asked by MAST to deal with your complaint.

Stage 2

If you are dissatisfied with this response you may request a review by the director or head of department of the relevant team. Your request should be sent to the email / postal address given above, who will forward your request to the director/head of department of the relevant team for a review.

Stage 3
If you are still dissatisfied with this response you may request a review by MAST CEO.

Stage 4
If having followed the 3 stages of our complaints procedure you still remain dissatisfied, you can ask to have your complaint reviewed externally by someone who does not work, which can include an independently appointed lawyer who is registered with the International Association of Arbitrators.
The ruling of the Arbitrator is final.

Nothing in this policy should be interpreted to restrict any rights of redress the Complainant has in law.

The company will not reimburse any fees, expenses or cost involved in bringing a Complaint.

Extending time limits
We aim to complete all complaints within the period of 2 month; however, if a complaint is very complex it may occasionally be necessary to extend the time limit. If this is the case, we will keep the complainant informed of progress with the investigation, the reasons for the delay, and the new deadline.

3.0 Complaints not covered by the procedure:

This complaints procedure cannot be used to deal with an issue which is part of any legal action against the Company.

This complaints procedure cannot be used by an employee. Any specific complaints made by employees should be directed through the relevant internal grievance policy and procedure.

Third Party Complaints Policy & Procedure

The complaints procedure cannot be used for complaints outside of those relating to any allegations of improper and/or illegal conduct as contained in the International Code of Conduct for Private Security Service Providers (ICOC).

The company reserves the right to take any appropriate action to protect itself from any unfounded, malicious or vexatious allegations or complaints. Untrue allegations could lead to legal action for defamation.

Complaint Form

1. Details of complainant	
Name/organization	
Address	
Postcode	
Town	
Country	
Phone	
Email	
Details of person acting on behalf of complainant (if applicable)	
Details of person to be contacted (if different from above)	
2. Product description / service description	
Reference number (if known or applicable)	
Description	

3. Problem encountered	
Date of occurrence	
Description	
4. Remedy requested	
Yes / No	
5. Date and signature	
Signature	
Date	
6. Attachments	

	Please list all the attachments / evidence regarding the alleged breach

MAST SECURITY LTD

1 St Andrew's Hill, London, EC4V 5BY
Company Registration No: 5428135

24/7 OPERATIONS CENTER

+44 (0) 2079 380 921
protection@mast-security.com

MARITIME SECURITY

+44 (0) 2079 380 921
operations@mast-security.co.uk