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# **Complaint handling in organizations – Specification**

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## Foreword

### Publishing information

This British Standard is published by BSI Standards Limited, under licence from The British Standards Institution, and came into effect on 30 June 2015. It was prepared by Subcommittee SVS/0/4, *Complaints handling*, under the authority of Technical Committee SVS/0, *Customer service – Fundamental principles*. A list of organizations represented on this committee can be obtained on request to its secretary.

### Use of this document

It has been assumed in the preparation of this British Standard that the execution of its provisions will be entrusted to appropriately qualified and experienced people, for whose use it has been produced.

### Presentational conventions

The provisions of this standard are presented in roman (i.e. upright) type. Its requirements are expressed in sentences in which the principal auxiliary verb is "shall".

*Commentary, explanation and general informative material is presented in smaller italic type, and does not constitute a normative element.*

Requirements in this standard are drafted in accordance with *Rules for the structure and drafting of UK standards*, subclause J.1.1, which states, "Requirements should be expressed using wording such as: 'When tested as described in Annex A, the product shall ...'". This means that only those products that are capable of passing the specified test will be deemed to conform to this standard.

### Contractual and legal considerations

This publication does not purport to include all the necessary provisions of a contract. Users are responsible for its correct application.

**Compliance with a British Standard cannot confer immunity from legal obligations.**

## Introduction

This British Standard provides a specification for the design and implementation of an effective and efficient complaint-handling process for all types of commercial or non-commercial activities. It is intended to benefit an organization and its customers, complainants and other interested parties.

The effective management of complaints enables an organization to identify any problems that customers might be experiencing from its products and/or services. The information subsequently obtained can be used to provide remedial action to put things right for affected customers and also lead to improvements in products services and processes. Also, if complaints are properly handled and managed, an organization can improve its reputation, regardless of size, location and sector.

An effective and efficient complaint-handling process reflects the needs of both the organizations supplying products and services and those who are the recipients of those products and services.

The handling of complaints through a process as described in this British Standard can enhance customer satisfaction. Encouraging customer feedback, including complaints if customers are not satisfied, can offer opportunities to maintain or enhance customer loyalty and approval (see BS 8477), and improve domestic and international competitiveness.

Implementation of the process described in this British Standard can:

- provide a complainant with access to an open and effective complaint-handling process;
- enhance the handling of complaints from vulnerable or disadvantaged complainants, including children;
- encourage feedback from those who do not currently complain;
- provide a high quality and consistent response to complaints made through all channels, e.g. social media, webchat and other emerging channels (including those posted on third party review sites);
- enhance the ability of the organization to identify and resolve complaints in a consistent, systematic and responsive manner, to the satisfaction of the complainant and the organization;
- enhance the ability of an organization to identify trends and eliminate causes of complaints, and improve the organization's operations;
- help an organization create a customer-focused approach to resolving complaints, and encourage personnel to improve their skills in working with customers; and
- provide a basis for continual review of the complaint-handling process to meet any changes in organizational requirements, consumer expectations and external factors such as regulatory changes.

Findings from the complaint-handling and any alternative dispute resolution processes can be used in conjunction with other feedback from customers, personnel and benchmarking studies, to drive further improvements in customer satisfaction.

## 1 Scope

This British Standard specifies requirements for a complaint-handling process, including planning, design, operation, maintenance and improvement. The complaint-handling process is suitable for use as one of the processes of an overall quality management system.

This British Standard specifies the following aspects of handling and managing complaints:

- a) enhancing customer satisfaction by creating a customer-focused environment that is open to feedback (including complaints), resolving any complaints identified, and enhancing the organization's ability to improve its customer service;
- b) involving top management and commitment through adequate acquisition and deployment of resources, including personnel training;
- c) recognizing and addressing the needs and expectations of complainants;
- d) providing complainants with an open, effective and easy-to-use complaints process;
- e) analysing and evaluating complaints to improve products, services and customer service quality;
- f) auditing of the complaint-handling process;
- g) reviewing and improving the effectiveness and efficiency of the complaint-handling process;
- h) publicizing anonymized learning that has been implemented from complaints and other feedback.

This British Standard covers complaints made through any contact channel and is intended for use by organizations of all sizes and in all sectors. It includes complaints from any customer or user of the service, including businesses.

This British Standard does not apply to disputes that are referred for resolution outside the organization or for employment-related disputes.

## 2 Terms and definitions

For the purposes of this British Standard, the following terms and definitions apply.

### 2.1 alternative dispute resolution

external service provided for settling disputes, between an organization and its complainants, as an alternative to taking action in the civil courts

### 2.2 complainant

person, organization, or its representative, making a complaint

[SOURCE: BS ISO 10002:2014, 3.1]

### 2.3 complaint

expression of dissatisfaction made to an organization, related to its products, services, practices, staff or the handling of a complaint where a response or a resolution is explicitly or implicitly expected

[SOURCE: BS ISO 10002:2014, 3.2, modified]

*NOTE Organizations may also want to consider for insight purposes any general comments left on social media sites where a response is not expected.*

### 2.4 customer

organization or person that receives a product or service

EXAMPLE Consumer, client, end-user, retailer, beneficiary, and purchaser.

[SOURCE: BS EN ISO 9000:2005, 3.3.5, modified – Note has been deleted]

**2.5 customer satisfaction**

customer's perception of the degree to which their requirements have been fulfilled

[SOURCE: BS EN ISO 9000:2005, 3.1.4, modified – Notes have been deleted]

**2.6 customer service**

interaction of the organization with the customer throughout the life cycle of a product or service

[SOURCE: BS ISO 10002:2014, 3.5, modified]

**2.7 customer vulnerability**

condition in which a customer is at greater risk of mis-selling, exploitation or being put at a disadvantage in terms of accessing or using a service, or in seeking redress

[SOURCE: BS 18477:2010, 2.7, modified – Note has been deleted]

**2.8 feedback**

opinions, comments, and expressions of interest in the products, services or the complaint-handling process

[SOURCE: BS ISO 10002:2014, 3.6]

**2.9 frontline**

personnel directly responsible for customer contact or complaint resolution within an organization

**2.10 interested party**

person or group having an interest in the performance or success of an organization

[SOURCE: BS EN ISO 9000:2005, 3.3.7, modified – Example and note have been deleted]

*NOTE Interested parties might include anyone who is directly impacted, e.g. an organization's vehicle obstructing access to a private property.*

**2.11 personnel**

those involved in delivering the organization's service to its customers

*NOTE This includes employees, agents, contractors and volunteers.*

**2.12 process**

set of interrelated or interacting activities which transforms inputs into outputs

[SOURCE: BS EN ISO 9000:2005, 3.4.1, modified – Notes have been deleted]

## 3 General principles

### 3.1 Enabling and identifying complaints

#### 3.1.1 General

A proactive, customer-focused approach shall be adopted in seeking and encouraging customer feedback and in identifying and receiving complaints (see Clause 6).

The complaint-handling process and supporting information shall be easy to understand and use with the information provided in clear language (see 6.1).

*NOTE Organizations should check that information is clearly understood by checking with consumers and/or obtaining independent assurance.*

Access to the complaint-handling process shall be free of charge and a complainant shall not be charged a fee or be required to use premium phone lines when making a complaint (see **D.3**).

### 3.1.2 Visibility

Information about how and where to complain shall be sign-posted and publicized with information made available on the various ways of making and resolving complaints including any external alternative dispute resolution scheme (see **6.1**).

### 3.1.3 Accessibility

The complaint-handling process shall be accessible, including support provided to people who might require assistance to make a complaint (see **D.2**). Where the organization provides products or services that are purchased or used by children and young people, it shall also ensure that its complaint-handling process is child friendly (see **D.1**).

Information and assistance shall be made available, in whatever languages or formats that the products and services were offered or provided in, including alternative formats so that no complainants are disadvantaged (see **D.1**).

*NOTE Information and assistance might include an advice helpline (where translation services might be made available and/or information is provided upon advocacy services that might be able to assist a complainant), referral or signposting to independent source of advice, specific content which can be easily located on an organization's website, printed leaflets and also alternative formats such as Braille (for the visually impaired) and audio.*

The following components shall be addressed for accessibility in the complaint-handling process:

- a) access to readable and easy to understand information about how to make a complaint and the complaint process;
- b) the options and process for making a complaint;
- c) personnel training for those likely to receive complaints in:
  - 1) identifying and recording complaints;
  - 2) identifying people who may require additional assistance to make a complaint;
  - 3) providing an initial acknowledgement of complaints received;
  - 4) the complaint-handling process;
  - 5) acquiring the complainant's preferred method of contact and particular requirements for access to information or communication where supported by the organization's processes; and
  - 6) possible escalation paths.
- d) assistance for people to make a complaint if required;
- e) the process for accepting complaints from family members, friends, agents, advocates or others who act on behalf of, or support, a person who themselves might have limited capacity to make a complaint.

### 3.1.4 Representatives

The organization shall permit authorized representatives to represent complainants.

*NOTE Authorized representatives might include persons acting on behalf of others, e.g. family members, legal representatives, consumer organizations and elected representatives.*



## 3.2 Complaint handling

### 3.2.1 Responsiveness

Receipt of each complaint shall be promptly acknowledged (see 6.2). Complaints shall be dealt with as a workload priority and investigated thoroughly to ensure a fair outcome (see 6.5).

*NOTE 1 Organizations should make sure that complaints are appropriately prioritized so that complaints are not left unattended due to other work pressures that might otherwise be given a higher priority.*

An organization shall make sure that all personnel members are aware of the need to treat complainants courteously. Complainants shall be kept informed of the progress of their complaint with expectations actively managed.

*NOTE 2 Organizations should seek to actively involve a complainant in the complaints process as far as practicable and appropriate in the circumstances. This could involve regular conversations with the complainant including discussion about any suggested resolution of the complaint.*

### 3.2.2 Objectivity

Each complaint shall be addressed in an equitable and unbiased manner (see Annex A).

The organization shall implement policies and/or guidelines that set out the behaviour expected of both its personnel and complainants (see Annex B).

### 3.2.3 Accountability

Accountability for the development, operation and review of the organization's complaints handling policy shall be clearly documented (see Annex C).

Personnel shall be authorized and trained to implement the complaint-handling policy (see 4.3).

### 3.2.4 Ensuring no detriment to complainant

All reasonable steps shall be undertaken to ensure that complainants are not adversely affected because of a complaint made by them or on their behalf.

## 3.3 Prevention of ongoing disputes

The organization shall develop and implement processes that minimize the possibility of complaints escalating into ongoing disputes (see 5.4).

## 3.4 Communication

The organization shall inform its customers about its complaint-handling procedures.

The organization shall regularly make information on its complaint-handling performance, including improvements made in response to customer feedback, readily available to reassure customers and assist in the choice of products, services and suppliers.

*NOTE Information on complaint-handling performance includes details of the numbers and types of complaints received and timescales for resolution.*

All information and communications provided to customers shall be consistent with the provisions of the organization's complaint-handling policy and procedures.

## 4 Complaint-handling framework

### 4.1 Commitment

The organization shall demonstrate a commitment to effective and efficient complaints handling; this shall be part of the management's responsibility (see 7.2).

*NOTE This should be demonstrated by, and promoted from, the organization's top management by establishing a service culture where complaints are seen as opportunities to strengthen relationships with customers and personnel are encouraged to understand how the customer feels by putting themselves in the complainant's shoes.*

### 4.2 Policy

The organization's top management shall establish a complaint-handling policy that focuses on the needs and expectations of customers (see 5.1). The policy and guidance shall be made available to, and known by, all personnel.

The policy shall be supported by procedures and consistent objectives for each function and personnel role included in the process.

The policy shall be easily accessible to customers and interested parties (see Annex D).

*NOTE 1 For example, including signposting the policy on the organization's communications.*

When establishing the policy and objectives for the complaint-handling process, the following factors shall be taken into account:

- a) the input of customers, personnel and other interested parties;
- b) any relevant statutory and regulatory requirements; and
- c) the content of the organization's quality procedures.

*NOTE 2 For further details see BS EN ISO 9001.*

- d) contact channels.

A clear escalation process shall be established (see 5.5).

*NOTE 3 There are some sectors where, due to regulatory reasons (usually imposed by an external governing body) an escalation process is not permissible. In such cases this would override internal processes.*

### 4.3 Responsibility and authority

The organization shall establish the roles, responsibilities and authorities of its management and other personnel for the complaint-handling process (see Annex C).

The organization shall specify the responsibilities of interested parties involved in the complaint-handling process.

## 5 Planning and design

### 5.1 Establishing customer expectations

The organization shall regularly gather information on the expectations of its current and potential customers [see 7.4b)] as well as other interested parties (if they need to make a complaint) including:

- a) communication of information to customers and visibility of the complaints procedure;

- b) choice and availability of contact options for making a complaint, e.g. access channels and contact times;

*NOTE 1 Access channels for making a complaint include face to face, telephone, letter, fax, email, texting, social media and other web-based systems.*

- c) complaint resolution, including timescales for each channel, keeping the customer informed and remedies.

*NOTE 2 Remedies include explanation and apologies, rectification and remedial action, refunds or reduction in charges and compensation.*

*NOTE 3 Target timescales for complaint resolution should reflect customer expectations and the type of complaint being handled (see 6.5).*

*NOTE 4 Expectations of current and potential customers might be established through feedback, discussions, questionnaires, surveys, interviews, social media, third party sites capturing customer reviews and by researching best practice. Consideration could be given to seeking the views from previous complainants.*

## 5.2 Determining objectives

The organization shall use the information gathered on customer expectations and the guiding principles (see Clause 3) to:

- a) determine the objectives required to deliver an effective and efficient complaint-handling service that is accessible to all its customers;
- b) establish clear targets and performance measures that can be used to assess and review the organization's complaint-handling performance.

## 5.3 Developing the complaint-handling process

The organization shall plan, design and implement a complaint-handling process that reflects the agreed objectives established in 5.2. The complaint-handling process shall:

- a) encourage prompt resolution of complaints to the satisfaction of the complainant;

*NOTE 1 Satisfaction can be checked by confirming with the customer, feedback surveys or other consumer research methods.*

- b) provide feedback and learning that helps to improve the quality of the organization's products and services;

*NOTE 2 The complaint-handling process might be linked to and aligned with other processes of the quality management system of the organization.*

- c) reflect the size, type and complexity of the organization, the products and services provided and the way that services are delivered to customers;

- d) include instructions and guidance to personnel on:

- 1) how to manage complaints in accordance with the complaint-handling policy;
- 2) the roles, responsibilities and authorities of everyone involved;

*NOTE 3 An example of an authority is approving a reduction in the customer's bill.*

- 3) signposting and referral of complainants to external organizations able to provide the customer with independent help and advice, e.g. statutory consumer bodies, trade bodies, etc.;
- 4) identifying customer vulnerability and supporting customers who might be disadvantaged due to difficulties in making complaints or seeking remedy;

*NOTE 4 For further information on customers in vulnerable circumstances see BS 18477.*

- e) cover all elements of the complaint-handling process (see Clause 6);
- f) include the interfaces with all of the related internal and external activities and systems involved in resolving complaints.

*NOTE 5 Internal activities include sales and marketing, logistics, customer service, operations, billing and administration, finance and support functions, debt collection and recovery. External activities includes functions performed by manufacturers, suppliers, installers, partners, contractors, agents and other third parties involved with the supply and delivery of the organization's products and services to its customers.*

## 5.4 Complaints management

The organization's complaint-handling process shall prevent problems that lead to complaints and disputes by:

- a) reviewing or suspending related planned legal or debt recovery action while the complaint is investigated so that the customer is not disadvantaged or penalized as a result of making a complaint;
- b) identifying and prioritizing urgent complaints and emergencies received out of business hours;
- c) escalating complaints that have not been resolved at the first point of contact within target timescales (see 5.5);
- d) identifying new or emerging types of complaints so that urgent action can be taken to prevent further complaints;
- e) proactively contacting customers to forewarn them of possible delays or potential problems and taking action to mitigate the impacts;
- f) establishing arrangements to monitor and regularly review the efficiency and effectiveness of its complaint-handling activity, with timely action taken to address any areas of underperformance (see Clause 7).

*NOTE Information for reviews includes comparison of actual and target performance for each of the key performance indicators, employee and customer feedback, satisfaction surveys, benchmarking, instances of non-compliance with complaint-handling procedure and audit.*

## 5.5 Unresolved complaints

The organization's complaint-handling process shall enable the majority of complaints received to be investigated, resolved promptly and efficiently by frontline personnel.

*NOTE 1 Prompt handling of complaints reflects the targets established by the organization in accordance with 5.2b) for each type of complaint.*

*NOTE 2 Serious complaints about policy or personnel misconduct that cannot be dealt with by frontline personnel may be referred directly to a senior level for investigation.*

If complaints cannot be resolved at the frontline, the process shall include provisions and responsibility for escalation and review.

*NOTE 3 Escalation and review might include:*

- a) escalation of the complaint if frontline personnel have not resolved the complaint to the customer's satisfaction within target timescales or if the customer is dissatisfied with the way that the complaint has been handled; and/or

- b) a final review if the complaint is not resolved at the more senior level, either by another person not previously involved in the dispute or by an alternative dispute resolution process.

*NOTE 4* The organization may establish an alternative dispute resolution process (see BS ISO 10003) or join a voluntary scheme if one exists.

The maximum number of escalation stages after the frontline shall not exceed two, excluding any alternative dispute resolution.

*NOTE 5* A second or subsequent complaint about the way that the original complaint was handled should be treated as a new complaint. It should be handled by unbiased and different personnel.

## 5.6 Complaint-handling resources

The organization shall assess and make available the personnel and other resources needed to identify, investigate and resolve complaints received through each contact channel to the complainant's satisfaction, within target timescales. This assessment shall:

- a) specify the number of personnel with appropriate skills that need to be recruited and trained; taking into account the forecast activity levels and any additional support required to deal with customer vulnerability;
- b) identify all other resources that need to be procured, developed or made available;
- c) include measures to deal with fluctuations in the expected volumes of complaints.

*NOTE* Resources include:

- 1) personnel who are regularly assessed to ensure they possess the skills, behaviours, knowledge and support needed to deal effectively and efficiently with the type of complaints received by the organization;
- 2) sufficient numbers of specialist personnel with the necessary technical or specialist knowledge required to investigate technical or complex issues including the authority and capability to implement any actions agreed to resolve the complaint;
- 3) clear procedures, documentation and processes;
- 4) technology, e.g. hardware, software and web-based or other electronic systems;
- 5) facilities, equipment, materials and finance.

# 6 Operation of the complaint-handling system

## 6.1 Provision of information

Public information concerning the complaint-handling process, such as brochures, pamphlets or electronic-based information, shall be made freely available to customers and their representatives, complainants, personnel and other interested parties.

Such information shall be provided in clear language and in accessible formats, so that no complainants are disadvantaged. The following shall be provided:

- a) signposting informing customers or their authorized representatives that they can complain if they wish to do so;

*NOTE* This might be by invitation, for example printed on till receipts, invoices, website information, etc.

- b) a summary of the organization's process for handling complaints;

- c) information about where customers can make their complaints, e.g. available locations, addresses, including electronic locations and any third-party supplier responsible for delivering the product or service;
- d) information on available channels for making complaints, e.g. in writing by post, email, over the telephone, via website;
- e) information to be provided by the complainant; the information requested shall be that which meets the needs of the organization to enable efficient handling of the complaint;
- f) a statement of commitment by the organization to deal with every complaint in an equitable and unbiased manner, and not to discriminate against complainants because they have complained;
- g) the time periods associated with various stages in the process;
- h) the complainant's options for remedy (see Annex E), including any alternative dispute resolution process available (see 6.9); and
- i) information on how the complainant is kept updated.

## 6.2 Receipt of complaint

The organization shall assess all customer contacts and identify whether they constitute a complaint in accordance with 6.5. Other customer contacts shall be handled through the relevant process, such as a query management procedure, service request process or related feedback process. The details shall be recorded (see 7.3) with supporting information and the complaint allocated a unique identifier code. Where the complaint cannot be promptly resolved, an acknowledgement shall be issued in accordance with 6.4.

The record of the complaint shall identify and include any remedy sought by the complainant and any other information necessary for the effective handling of the complaint including the following:

- date of receipt;
- a description of the complaint and relevant supporting data;
- the means by which they were received (post, telephone, e-mail, etc.);
- the products and services, or related organization practices complained about;
- the due date for a response including any interim communication to keep the complainant informed as to progress;
- any preferred mode of contact requested by the customer/complainant;
- data on people, department, branch, organization and market segment; and
- escalation or other immediate action taken or agreed (if any).

## 6.3 Tracking of complaint

The complaint shall be tracked via the complaint record from initial receipt through the entire process until the complainant is satisfied or the final decision is made and any agreed remedy is implemented.

*NOTE 1 The complaint record might be a customer relationship management (CRM) system, complaint management system or a paper record that is updated throughout the complaint-handling process.*

An up-to-date status shall be made available to the complainant upon request.

*NOTE 2 The organization should provide the customer with an update on the progress of their complaint at regular agreed intervals.*

## 6.4 Acknowledgement of complaint

Receipt of each complaint shall be acknowledged to the complainant promptly using any indicated preferred mode of contact, e.g. post, telephone or e-mail.

If the complaint is addressed to the organization on a social media site, the organization shall handle these complaints as if they had been received through any other channel and;

- a) respond directly to the complaint using social media; or
- b) acknowledge the complaint and invite the complainant to contact the organization through another channel so that the complaint can be handled away from the public eye for the protection of personal data.

*NOTE* In instances where feedback through social media about the organization or its products or services, the feedback should be recorded for insight purposes irrespective of any appearance that leads to the assumption the individual is not expecting a response.

## 6.5 Initial assessment of complaints

Each complaint shall be initially assessed in terms of criteria such as severity, safety implication, complexity, impact, and the need for and possibility of any immediate action. Complaints that can be resolved without the need for investigation shall be processed immediately avoiding lengthy formal review and the complainant notified of the outcome accordingly.

## 6.6 Investigation of complaints

Every reasonable effort shall be made to gather evidence and establish all the relevant circumstances and information surrounding all complaints requiring investigation (see 6.5). This shall include complaints made against third parties such as contractors carrying out work for the organization. The level of investigation shall be commensurate with the seriousness, frequency of occurrence and severity of the complaint. Every complaint shall be taken into account and acted upon.

*NOTE* This might be evidenced by how the complaint is handled. Specifically, what actions are taken, the resolution rates and what further actions result from the feedback such as any changes to processes for the future. All such actions and information should be recorded.

## 6.7 Response to complaints

Following an investigation the organization shall provide a response.

Responses shall address all aspects raised, including the proposed outcome and any measures being taken to prevent such a complaint happening in the future.

*NOTE 1* The organization should consider speaking directly to the complainant prior to final resolution.

If the complaint cannot be immediately resolved, then it shall be dealt with as soon as possible and the customer shall be kept informed.

*NOTE 2* This includes the possibility, where such avenues exist, of referral to an external or independent reviewing body in cases where the complainant remains dissatisfied after the internal complaints procedure has been exhausted.

## 6.8 Closing the complaint

If the complainant accepts the proposed outcome, this shall be carried out, the details recorded and the complaint shall be closed.

If the complainant rejects the proposed outcome, the complaint shall remain open until all internal steps have been exhausted.

If the complainant remains dissatisfied, this shall be recorded and the complaint shall be closed.

The complainant shall be informed, that having exhausted all internal means of resolution, the complaint is closed. The complainant shall also be advised of any alternative dispute resolution processes available.

*NOTE 1 Internal steps refer to the organization's complaint-handling procedures and includes a review of any additional information received from the customer (see 5.5).*

*NOTE 2 Guidance on dealing with dissatisfied customers and ongoing contact is given in Annex B.*

## 6.9 Quality review

The organization shall establish and implement an effective system to review the quality of responses to individual complaints and to take appropriate action to address any issues identified in the review.

*NOTE 1 The quality review may be based on a sample of complaints received across all channels and escalation points, to assess the quality and accuracy of the response provided both before and after responses are sent, e.g. by call monitoring or review of written communications.*

*NOTE 2 Appropriate action may include feedback to the personnel involved, additional training and/or contacting the consumer to explain that information previously provided was not correct.*

# 7 Maintenance and improvement

## 7.1 Collection of information

The organization shall record the performance of its complaint-handling process.

*NOTE 1 Recording of performance might include not only recording adherence to service targets such as speed of response, but also recording what actions were taken to learn lessons arising from complaints and what benefits have accrued to customers and the organization from these actions.*

*NOTE 2 Performance might also be measured against the overall objectives of the organization's complaint-handling process, which might include increasing the satisfaction levels of customers who have complained (see 7.4).*

The organization shall also establish and implement procedures for recording complaints and responses (see 6.2) and for using these records and managing them, while protecting any personal information and ensuring the confidentiality of complainants (see Annex D).

## 7.2 Management responsibility

The organization shall set and define responsibilities for those managers who are responsible for monitoring and reporting on the performance of the complaint-handling process and for taking corrective actions (see Annex F).

## 7.3 Analysis and evaluation of complaints

The records kept of complaints (see 6.2) shall be updated to include:

- a) what was the cause of the customer's dissatisfaction;
- b) whether or not the complaint was a service failure or policy or product issue; and
- c) what resolution was achieved and redress offered, if any.

This information shall be used to assess and analyse complaint patterns.



*NOTE 1 The following objectives could be used:*

- 1) *establishing systematic and recurring causes of complaints;*
- 2) *identifying opportunities to address and eliminate the issues causing systematic and recurring causes of complaint;*
- 3) *where appropriate, reporting back to individual customers on the actions taken to prevent complaints like theirs from recurring;*
- 4) *reporting back to the organization on a regular basis concerning the numbers and types of complaints and what actions have been taken to resolve them;*
- 5) *identifying and assessing any differences in the expectations of customers between the different channels by which complaints can be made;*
- 6) *highlighting to the organization what actions have been taken to address systematic and recurring causes of complaints;*
- 7) *publishing appropriately high level and anonymized information about complaints for external parties and stakeholders.*

*NOTE 2 Organizations need to be cautious of believing that further investigation is not required when there are only low numbers of complaints received on a subject.*

## 7.4 Satisfaction with the complaint-handling process

There shall be regular action taken to determine the levels of satisfaction of complainants with the complaint-handling process.

The organization shall also establish a fair and accessible customer feedback system that collects relevant, reliable and useable information which provides:

- a) rapid insight into the customer experience and enables early action to be taken to address issues that are causing frustration; and
- b) early warning of changes in customer needs and expectations relating to the complaint-handling process, including the way that complaints are made.

*NOTE This action might take the form of random surveys of complainants and other techniques, including mystery shopping, surveys of complainants and assessment of complaint outcomes against the satisfaction levels of complainants. Other indicators of customer satisfaction include:*

- 1) *feedback from customers who have not complained (but might have been dissatisfied);*
- 2) *feedback and insight from third-party sites and social media;*
- 3) *feedback from employees involved in the complaint-handling process.*

## 7.5 Monitoring of the complaint-handling process

Continual monitoring of the complaint-handling process, the resources required (including personnel) and the data to be collected shall be undertaken. Organizational processes and products differ widely, as do the performance-monitoring criteria appropriate to them. Organizations shall develop performance-monitoring criteria relevant to their particular circumstances.

The performance of the complaint-handling process shall be measured against predetermined criteria (see F.4).

The monitoring of complaint-handling data shall be used as a direct indicator of complaint-handling performance.

*NOTE 1 Monitoring of complaint-handling data might include the number or proportions of the following:*

- *complaints received by service area and by channel;*

- *complaints categorized by the number of issues raised within those complaints;*
- *complaints resolved at the point at which they are made;*
- *complaints incorrectly prioritized;*
- *complaints acknowledged after agreed time;*
- *complaints resolved after agreed time;*
- *complaints referred to external methods of resolution;*
- *repeat complaints;*
- *improvements in procedures due to complaints.*

Organizations shall exercise care in data interpretation, particularly when looking at the comparative levels of complaints across teams or departments within an organization, and in looking at complaint totals overall across an organization. Where possible, organizations shall also use more than one means of measurement so that a full understanding of the data is achieved.

*NOTE 2 For example, higher levels of recorded complaints do not necessarily mean that services are getting worse. Conversely, lower levels of recorded complaints do not necessarily mean that things are improving. Higher numbers of complaints can mean that an organization is listening properly to its customers' feedback when it might not have been previously.*

*NOTE 3 Objective data such as response times might show how well the process is working but might not provide information about complainant satisfaction.*

## 7.6 Auditing of the complaint-handling process

The organization shall regularly perform or provide for audits in order to evaluate the performance of the complaint-handling process. The audit shall provide information on:

- process conformity to complaint-handling procedures; and
- process suitability to achieve complaint-handling objectives.

*NOTE The complaint-handling audit may be conducted as part of the quality management system audit, see BS EN ISO 19011.*

The audit results shall be taken into account in the management review to identify problems and introduce improvements in the complaint-handling process. The audit shall be carried out by personnel independent of the activity being audited.

## 7.7 Management review of the complaint-handling process

### 7.7.1 Objectives of management review

The organization shall review the complaint-handling process no less than every three years in order to:

- a) ensure its continuing suitability, adequacy, effectiveness and efficiency;
- b) identify and address instances of non-conformity with health, safety, environmental, customer, regulatory and other legal requirements;
- c) identify and correct product or service deficiencies;
- d) identify and correct process deficiencies;
- e) identify and correct deficiencies in the organization's explanations of the scope and nature of its products and services;
- f) assess opportunities for improvement to products and services and to the complaint-handling process;

- g) evaluate potential changes to the complaint-handling policy and objectives.

*NOTE Good practice would be to make changes as failures or deficiencies are identified.*

### 7.7.2 Inputs to management review

The input to management review shall include, but should not be limited to, information on:

- a) internal factors such as changes in the policy, objectives, organizational structure, resources available, and products and services offered or provided;
- b) internal quality metrics such as service standards;
- c) external factors such as changes in legislation, competitive practices, the state of the economy, any relevant regulatory requirements, the views of any supervising ombudsman or other independent complaints reviewer or technological innovations;
- d) the overall performance of the complaint-handling process, including customer satisfaction surveys, insights gained from complaints into customer needs and expectations and the results of the continual monitoring of the process;
- e) the data gathered and reported on in accordance with 7.4;
- f) the results of audits;
- g) delivered and pending corrective and preventative actions;
- h) follow up actions from previous management reviews;
- i) recommendations for improvement.

### 7.7.3 Outputs to management review

The output from the management review shall include:

- a) decisions and actions related to improvement of the effectiveness and efficiency of the complaint-handling process;
- b) proposals on product and/or service improvement;
- c) decisions and actions related to identified resource needs (e.g. training programmes);
- d) internal and external communications about the management review.

Records from the management review shall be maintained and used to identify opportunities for improvement.

## 7.8 Continual improvement

Continual improvement shall be achieved through corrective and preventative actions and innovative improvements. The organization shall take action to mitigate the causes of existing and potential problems leading to complaints in order to prevent recurrence and occurrence, respectively.

*NOTE 1 Approaches to continual improvement might include:*

- a) *exploring, identifying and applying best practices following benchmarking in complaints handling;*
- b) *fostering a customer-focused approach within the organization;*
- c) *encouraging innovation in complaint-handling development;*
- d) *encouraging and facilitating ownership of complaint handling and resolution at the earliest possible stage, preferably at the point that complaints are first made or received;*

e) *recognizing exemplary complaint-handling behaviour.*

*NOTE 2 For additional guidance on a generic methodology for continual improvement, organizations should refer to BS EN ISO 9004:2009.*

Annex A  
(informative)  
A.1

## Objectivity

### General

The principles for objectivity in the complaint-handling process include the following.

- a) **Openness:** well publicized, accessible and understood by those involved in a complaint. The process should be clear and well publicized so that both personnel and complainants can follow them.
- b) **Impartiality:** avoiding any bias in dealing with the complainant, the person complained against or the organization. The process should be designed to protect the person complained against from any biased treatment. Emphasis should be placed on solving the problem and not on assigning blame. If a complaint is made about personnel, the investigation should be carried out independently.
- c) **Confidentiality:** the process should be designed to protect the complainant's and customer's identity, as far as is reasonably possible. This aspect is very important to avoid deterring possible complaints from people who might be afraid that giving details could lead to inconvenience or discrimination.
- d) **Accessibility:** the organization should allow the complainant access to the complaint-handling process at any reasonable point or time. Information about the complaints process should be readily available in clear language and in formats accessible to all complainants. When a complaint affects different supply chain participants, a plan to coordinate a joint response should be made. The process should allow any information arising from the complaints to be known by any suppliers of the organization that are concerned by the complaint so that they are able to make improvements.
- e) **Completeness:** finding out the relevant facts, talking to people from both sides involved in the complaint to establish a common ground and verify explanations, whenever possible.
- f) **Equitability:** giving equal treatment to all people.
- g) **Sensitivity:** each case should be considered on its merits, paying due care to individual differences and needs.

### A.2 Objectivity for personnel

Complaint-handling procedures should ensure that those complained against are treated objectively; this implies:

- informing them immediately and completely on any complaint about their performance;
- giving them the opportunity to explain the circumstances and allowing them appropriate support;
- keeping them informed of the progress in the investigation of the complaint and the result.

Those against whom a complaint has been made should be given full details of the complaint before they are interviewed. However, confidentiality should be observed.

Personnel should be reassured that they are supported by the process. Personnel should be encouraged to learn from the complaint-handling experience and to develop a better understanding of the complainant perspectives.

### A.3 Confidentiality

In addition to ensuring complainant confidentiality, the complaint-handling process should ensure confidentiality in the case of complaints against personnel. The details of such complaints should be known only by those directly concerned.

Confidentiality should not be used as an excuse to avoid dealing with a complaint.

### A.4 Objectivity monitoring

Organizations should monitor the responses to complaints to ensure complaints are handled objectively, measures could include:

- a regular monitoring (e.g. monthly) of resolved complaint cases selected at random;
- surveys of complainants asking them if they were treated in an objective manner.

## Annex B (informative)

### Unacceptable and unreasonable behaviours

The large majority of customers conduct themselves appropriately when making a complaint; good, well-trained customer service personnel understand that making a complaint can be an emotive experience for a customer and that some anger might be initially experienced and need to be handled. On rare occasions, a customer may display behaviours that are considered to be unacceptable to an organization.

An organization should establish guidelines that set out the expected behaviour of complainants, this could include the following to be used to identify when the conduct of a complainant has become unreasonable:

- safety issues for staff: the conduct includes threats or actual violence;
- health issues for staff: the conduct becomes significantly unreasonable and causes staff in the organization to suffer stress;
- resource issues: the conduct causes an unacceptable amount of time and resources to be expended; or
- equity issues: the conduct requires a significant level of time and resource to be allocated to handle and investigate the complaint, and where the outcome is unlikely to warrant the allocation of those resources, and also negatively impacts on the handling of other complaints.

*NOTE* See also the Australian Commonwealth Ombudsman [1] for further details.

A complaint-handling policy should be updated to give personnel the advice and support to deal with such difficult situations, especially where organizations might deliver vital services, such as banking, energy supply, water supply, government and healthcare services, and have limitations in taking a decision not to deal with a customer.

The vast majority of customers behave in legitimate ways however a few might persist unreasonably in pursuing their complaints. These complaints can be difficult and time consuming but even though someone might have previously acted unreasonably in making a complaint, it cannot be assumed that the next complaint also results in unreasonable conduct by the complainant. Each complaint needs to be dealt with separately, and a decision made as to whether the complainant is acting unreasonably (such as threatening harm or violence, unnecessary and excessive phone calls and emails, etc.). There is no way of avoiding reading and evaluating each piece of correspondence. This can be time consuming, but it must be done.

The organization might decide to restrict the complainant's behaviour and limit the negative impact on staff. The restriction might involve a limit on staff availability to deal with the complainant, such as restricting access to specific personnel and placing a limit on the time that personnel can spend in a given period of time on handling any complaints. Another restriction might be on the choice of communication methods; the organization might decide that the complainant may be restricted to putting any complaints in writing. If the conduct is particularly serious, an organization might also choose to obtain the assistance of the law, such as seeking an injunction to prevent any future incidents of threatening or abusive conduct by a complainant.

**Annex C**  
**(informative)**

## **Responsibilities and authorities of complaint-handling roles**

### **C.1 Top management**

Senior management should have overall ownership of the complaints management process for the organization, they should be responsible for the following:

- a) ensuring that the complaint-handling process and objectives are established within the organization;
- b) ensuring that the complaint-handling process is planned, designed, implemented, maintained and continually improved in accordance with the complaint-handling policy of the organization;
- c) identifying the resources needed to manage the complaint-handling process;
- d) ensuring the promotion and awareness of the complaint-handling process and its consistent application together with the need for a customer focus throughout the organization;
- e) acting to address and manage critical and systemic issues.

### **C.2 Complaints manager**

Depending on the size of the business this might be an individual, a team or managed as part of an individuals' wider responsibilities, complaints managers should be responsible for the following:

- a) overall ownership of any systems or processes to raise, log and track complaints;
- b) ensuring that information about the complaint-handling process is communicated to customers, complainants, and, where applicable, other parties directly concerned in an easily accessible manner;
- c) establishing a process of performance monitoring, evaluation and reporting, including lessons learnt/root cause analysis to continually learn from complaints;
- d) regular reporting to senior management on the types and trends of complaints received;
- e) lessons that have been implemented together with recommendations for any improvements needed for the complaint-handling process;
- f) maintaining the effective and efficient operation of the complaint-handling process, including training and ensuring that the process meets the needs of customers, personnel and the organization;
- g) informing top management of critical and systemic issues;
- h) ensuring the complaint-handling process continues to reflect good practice.

### C.3 Operational or departmental managers

Other managers involved in the complaint-handling process should, as applicable within their area of responsibility, be responsible for the following:

- a) ensuring their business areas possess a good awareness of the complaint-handling process and the benefits it brings to customers and to the business;
- b) ensuring that personnel cooperate and provide timely information and comments to assist in the investigation of complaints;
- c) taking action to correct a problem, preventing it from happening in the future, and that the event is recorded;
- d) reporting on actions and decisions taken that result from complaints in their area;
- e) complaint-handling data is available for reviews.

### C.4 Complaint handling personnel

All personnel in contact with customers and complainants should:

- have training in complaints handling, including, where appropriate, an understanding of any regulatory commitments;
- promptly respond to complaints or direct customers to the appropriate individual, escalating where appropriate;
- comply with any complaints handling reporting requirements determined by the organization.

### C.5 Personnel

All personnel should:

- be aware of the complaint-handling process;
- be aware of the potential for complaints to be generated in the course of their work and act accordingly;
- act promptly when errors are identified to correct the issue before it becomes a complaint.

## Annex D (informative)

## Accessibility

### D.1 General

Consumers should feel encouraged to voice their concerns about an organization's product, system or services. Organizations should communicate how such feedback is used to improve their product, system or services.

Some consumers have greater difficulty than others in making a complaint or participating in the complaint-handling process. Organizations should recognize that some consumers might require additional assistance or different approaches, such as people with disabilities, people living in regional or remote areas, children, young people, the aged and people from culturally and linguistically diverse backgrounds.

*NOTE For children organizations should refer to the Common Principles for a Child Friendly Complaints Process [2] specified by the Children's Commissioner.*

### D.2 Making the complaint-handling process accessible and usable

The complaint-handling process should be easy to access, understand and use.



Clear and simple information about an organization's complaint management process should be available in a range of languages and accessible formats on its website, posters and brochures. Alternative formats can include:

- a) large print;
- b) braille, audio format;
- c) sign language;
- d) DVD or on-line video guides;
- e) plain English/pictures.

The organization's personnel should be familiar with the complaint-handling process, be trained in providing an initial acknowledgement of any complaints received, and provide assistance to make a complaint if necessary. Frontline personnel should also be able to refer complainants to a person within the organization who then manages the complaint.

Personnel likely to be involved in managing complaints should be trained in identifying people who might require additional assistance to make a complaint and in consulting with the person and/or others close to them about their preferred method of contact and particular requirements for access or communication they might have.

### D.3 Flexible methods for making and handling complaints

Organizations should provide flexible methods for making a complaint, this might include complaints being made:

- a) in person;
- b) over the phone;
- c) via social media channels;
- d) in writing via email, fax, letter or electronically;
- e) through web-chat;
- f) feedback forms, e.g. "tell us what you think...".

Organizations should accept complaints from family members, advocates, friends or other people who act on behalf of, or support, a person who themselves might have limited capacity to make a complaint. That person's authority to act on another person's behalf should be verified if personal information is involved.

Organizations should make their process more accessible by having:

- 1) a free phone number;
- 2) a phone number that is included in mobile call packages;
- 3) a text-based telephone service for people with hearing impairment;
- 4) access to interpreting/translating services;
- 5) accepting complaints via other technology, such as video calls.

Organizations should ensure that information about the different ways complaints can be made and the types of support available to people is easily accessible.

*NOTE For example, having a "complaints" portal on your home page can quickly take a potential complainant to the channels available to lodge a complaint.*

Annex E  
(informative)**Effective apologies, remedies and options for redress**

On responding to the complaint, the complaint handler makes a judgement on the issues raised and, where necessary, should provide a remedy (see Table E.1) to put things right for the affected customer and initiate corrective actions to prevent recurrence of the same problem.

Table E.1 Remedies (including apology and redress)

Type	Notes
Apology	The remedy is simply an apology or a wider remedy is supported by an apology
Voucher	The problem experienced or perceived is remedied by providing a voucher allowing the consumer to purchase an additional product or service from the organization or could also be a high-street voucher allowing the consumer to purchase a retail product
Service	To recognize the problem experienced, the consumer is provided with an additional level of service or upgraded to a higher-value service (this might be a one-off or temporary arrangement and potentially results in the consumer deciding to purchase this form of service in future)
Replace	A replacement product is provided to recognize that the original product was faulty
Repair	Arrangements are made to repair a faulty product and, if required, to arrange, at no cost, collection or return of the product
Reinstate	A service that was incorrectly withdrawn or terminated is reinstated (such as an overdraft facility on a bank account)
Refund	The problem identified that maybe the consumer overpaid and requires a refund for the overpayment or maybe that the problem experienced simply requires that they are refunded the money they paid for a service or product that failed
Information	Arrangements are made to provide the consumer with information that had not been previously provided to them or arrangements are made for a specialist explanation to be given about a matter where maybe communication had previously been poor about a technical or complex issue
Signpost	The problem experienced might not be within the receiving organization's resolution capabilities and therefore the consumer is given advice on how to contact another organization, supplier or agency that delivers what the customer actually requires
Customer literature	The problem identified demonstrated that information contained in customer literature is inadequate. This is remedied by agreeing to review and amend the relevant customer literature, e.g. customer literature includes leaflets, posters, warranty documentation, terms and conditions, billing statements, website content and so on
Rules	The problem identified a potential flaw in the organization's policies or procedures: the 'rules' that the organization and their staff members follow. This is remedied by agreeing to review the relevant policy or procedure and update the consumer on what action was taken
Keep a promise	The problem identified that the consumer was wrongly advised that they were entitled to something. This could be remedied by deciding that the promise made should be kept or to apply one of the other remedies in this list (such as "Staff learning" or "Rules")
Staff learning	The problem identified a gap in the knowledge of staff members within the organization (or from a partner or contractor). The remedy involves an agreement to arrange appropriate training or guidance to be given to personnel

Table E.1 Remedies (including apology and redress)

Type	Notes
Compensate	Sometimes the problem experienced incurred direct or indirect financial loss to the consumer or they experienced significant time and trouble in raising the complaint with the organization. The remedy might need to involve a financial payment as a goodwill gesture
Recall	Evaluation of the problem identifies a product safety issue that requires a product to be initiated by the organization

Annex F  
(informative)

## Maintenance and improvement

### F.1 General

This Annex is a generic guide for the effective maintenance and improvement of the complaint-handling process. The approaches adopted should be appropriate to the type and size of the organization.

### F.2 Procedures for recording complaints and for use and management of complaint records

Procedures for recording complaints and responses should include the following:

- a) specifying processes and systems for identifying, gathering, classifying, maintaining, storing and disposing of records;
- b) recording the handling of a complaint and maintaining these records, including the retention of historical records;
- c) keeping records of the delivery of training in complaint recognition and handling in the organization;
- d) specifying the organization's criteria for responding to requests for access to records held on complaints and complainants, including time limits, what kind of information needs to be provided, to whom, or in what format; and
- e) specifying how and when statistical non-personally identifiable complaints data are disclosed to the public.

### F.3 Management responsibility

Management responsibilities should include the following:

- a) top management should:
  - 1) define the monitoring objectives;
  - 2) define the monitoring responsibilities;
  - 3) conduct reviews of the monitoring process;
  - 4) ensure that improvements are implemented;
- b) a complaint-handling management representative should:
  - 1) establish a process of performance monitoring, evaluation and reporting;
  - 2) report to top management on the performance revealed during the complaint-handling process reviews so that all necessary improvements can be made;
- c) other managers involved in the complaints in the organization should ensure that:

- 1) adequate monitoring of the complaint-handling process is undertaken and recorded within their area of responsibility;
- 2) corrective action is taken and recorded within their area of responsibility;
- 3) adequate complaint-handling data is available for the top management review of the monitoring process within their area of responsibility.

#### F.4 Predetermined performance criteria

Examples of predetermined performance criteria might include the following:

- a) whether a complaint-handling policy and objectives has been established, maintained and made appropriately available;
- b) personnel perception of the top management commitment to complaints handling;
- c) personnel knowledge and awareness of the organization's complaint handling process and its complaints policy;
- d) whether responsibilities for complaints handling have been appropriately assigned;
- e) whether personnel in contact with customers are authorized and trained to resolve complaints on the spot wherever possible;
- f) whether discretionary limits concerning responses have been set for personnel in contact with customers;
- g) whether personnel specialized in complaints handling have been appointed;
- h) the proportion of personnel trained in complaints handling who are in contact with customers;
- i) the effectiveness and efficiency of complaint-handling training;
- j) the number of suggestions from personnel to improve complaints handling;
- k) attitude of personnel to complaints handling;
- l) frequency of complaint-handling audits or management reviews;
- m) time taken to implement recommendations from complaint-handling audits or management reviews;
- n) time taken to respond to complainants;
- o) degree of complainant satisfaction; and
- p) effectiveness and efficiency of the required corrective and preventive action processes, when appropriate.

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- [2] CHILDREN'S COMMISSIONER. *Common Principles for a Child Friendly Complaints Process*. The Office of the Children's Commissioner, 2013. <sup>2)</sup>

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<sup>1)</sup> Available for downloading from [http://www.ombudsman.gov.au/docs/better-practice-guides/Online\\_UnreasonableComplainantConductManual\\_CwthOmb.pdf](http://www.ombudsman.gov.au/docs/better-practice-guides/Online_UnreasonableComplainantConductManual_CwthOmb.pdf) [viewed 19 May 2015].

<sup>2)</sup> Available for downloading from [http://www.childrenscommissioner.gov.uk/content/publications/content\\_715](http://www.childrenscommissioner.gov.uk/content/publications/content_715) [viewed 19 May 2015].





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