

Travelife Complaints Policy and Procedure

1. Purpose and definition

Travelife aims to provide its services, assessment and certification activities in a professional, consistent and impartial manner. This procedure provides a formal process for receiving, investigating and resolving complaints and, where necessary, referring them for independent review.

A **complaint** is a formal written expression of dissatisfaction relating to Travelife activities or services, assessment or certification activities, recognised or certified companies, or persons or organisations acting on behalf of Travelife, where a response is expected.

Complaints may, for example, concern:

- the delivery of Travelife services;
- the conduct of Travelife staff, contractors, coaches, assessors or auditors;
- the conduct of an assessment or audit;
- compliance of a Travelife Partner or Travelife Certified company with applicable Travelife requirements;
- the use of the Travelife name, recognition or certification logos or related claims; or
- other matters falling within the scope of the Travelife programme.

A complaint is distinct from an **appeal**. An appeal is a formal request by a company for reconsideration of an assessment or certification decision affecting that company and is handled under the *Travelife Appeals Procedure*.

2. Who may submit a complaint

Any person or organisation may submit a complaint concerning a matter within the scope of the Travelife programme. This includes Travelife members, recognised and certified companies, assessors and auditors, business partners, consumers and other relevant stakeholders.

Travelife will determine whether a complaint falls within its scope and whether sufficient information has been provided to enable the complaint to be considered.

A complaint may be considered outside the scope of this procedure where it does not relate to Travelife, a Travelife activity or requirement, or a company or person not acting within the scope of the Travelife programme.

Where Travelife determines that a complaint falls outside its scope, the complainant will be informed in writing and provided with the reason for this determination.

Travelife will maintain a record of complaints received, including complaints determined to be outside the scope of the procedure.

3. Submitting a complaint

Complaints must be submitted in writing and should provide sufficient information to allow Travelife to understand and investigate the matter.

Where possible, the complaint should include:

- the name and contact details of the complainant;

- the person, company, activity or decision concerned;
- a clear description of the complaint;
- relevant dates and circumstances; and
- any available supporting evidence, such as documents, correspondence, photographs or other relevant information.

Complaints should be marked “**Complaint**” and submitted by email to:

Travelife General Manager
info@travelife.info

Formal complaints must be submitted in writing. Where a concern is initially raised verbally, the complainant may be requested to provide the relevant information in writing before it can be handled under this procedure.

4. Receipt and initial review

Travelife will acknowledge receipt of a complaint within **five working days**.

Travelife will conduct an initial review to determine:

- whether the complaint falls within the scope of Travelife;
- whether sufficient information has been provided;
- whether additional information is required from the complainant;
- whether the matter is already being considered through another Travelife procedure; and
- how the complaint should be investigated and handled.

Where additional information is required, Travelife may request this from the complainant before proceeding with the investigation.

The complainant will be informed of the next steps and, where possible, the expected timeframe for handling the complaint.

5. Investigation and internal resolution

Travelife will investigate complaints falling within its scope in a timely, objective and impartial manner and will seek, where possible, to resolve the matter directly with the parties concerned.

The complaint will be assigned to an appropriate person within Travelife. Where practicable, this person will not have been directly involved in the activity or matter giving rise to the complaint.

Depending on the nature of the complaint, the investigation may include:

- review of relevant documents, correspondence and records;
- consultation with relevant Travelife staff or contractors;
- information from assessors or auditors;
- information from a Travelife member or other party concerned by the complaint; and
- any other information considered relevant to establishing the facts.

Where a complaint concerns another person or organisation, that party will normally be given an appropriate opportunity to provide information and respond to the matters raised.

Travelife will seek to resolve the complaint on the basis of the information obtained and, where appropriate, take action to address the matter.

Where the complaint can be resolved through the internal complaint-handling process, Travelife will communicate the outcome and any relevant action taken to the complainant in writing.

6. Referral to the Appeals and Complaints Panel

Where a complaint **cannot be satisfactorily resolved through the internal complaint-handling process**, it may be referred to the **Travelife Appeals and Complaints Panel** for independent review.

A complaint may also be referred directly to the Panel where Travelife considers that the nature or seriousness of the matter requires independent consideration.

The complainant will be informed when a complaint is referred to the Panel and may be invited to provide additional information or supporting evidence.

The Panel will consist of persons with appropriate knowledge and competence relevant to the matter being considered. Panel members must be able to consider the complaint impartially and must not have been directly involved in the activity, assessment, audit or certification decision that is the subject of the complaint.

Before a complaint is considered, Travelife will check for actual or potential conflicts of interest. A person with a conflict of interest, or whose impartiality could reasonably be questioned in relation to the complaint, will not participate in its consideration and will be replaced where necessary.

One Panel member will act as **Chairperson**. Administrative support may be provided by a Travelife staff member who is not involved in determining the outcome of the complaint.

7. Panel review and decision

The Appeals and Complaints Panel will review the complaint and the results of Travelife's internal investigation, together with any additional information considered relevant.

The Panel's review may include:

- the original complaint and supporting evidence;
- the outcome of Travelife's internal investigation and attempted resolution;
- relevant Travelife criteria, requirements, procedures and records;
- information or representations provided by other parties concerned; and
- any additional information requested by the Panel.

The Panel may request further information or clarification from any relevant party and establish a reasonable timeframe for its submission.

Following its review, the Panel will determine whether the complaint is **upheld, partially upheld or not upheld** and identify any action considered necessary.

The Panel's decision and the reasons supporting it will be documented.

8. Timeframes and notification

Travelife will seek to investigate and resolve complaints as soon as reasonably possible. The complainant will be kept informed of progress and advised where additional information or time is required.

Where a complaint is referred to the Appeals and Complaints Panel, Travelife will seek to complete the overall complaint process within **90 calendar days** of receiving sufficient information to investigate the complaint.

Where the nature or complexity of the matter requires additional time, the complainant will be informed of the reason and the revised expected timeframe.

The complainant will be informed in writing of the final outcome and, where appropriate, the reasons for the decision and any relevant action to be taken.

Where another person or organisation is directly concerned by the complaint, Travelife will also communicate the relevant outcome to that party.

Where a decision is made by the Appeals and Complaints Panel, Travelife will aim to communicate the decision to the relevant parties within **seven working days** after the decision has been made.

9. Corrective action and follow-up

Where a complaint is upheld or otherwise identifies a weakness in Travelife activities, assessment or certification processes, Travelife will determine and implement appropriate action.

Depending on the nature of the matter, this may include:

- correction of an administrative or procedural error;
- corrective action relating to an assessment or certification process;
- follow-up with a recognised or certified company;
- measures relating to the use of Travelife logos or claims;
- additional training, guidance or oversight;
- revision of procedures or controls; or
- other measures appropriate to the findings of the complaint.

Travelife will also consider whether the complaint indicates a broader need for preventive action or improvement to the Travelife programme.

Actions arising from complaints will be recorded and, where appropriate, followed up to verify their implementation.

10. Impartiality and non-discrimination

Submission of a complaint will not result in discriminatory action against the complainant.

Persons involved in investigating, reviewing or deciding a complaint must act objectively and impartially. Persons who have been directly involved in the matter concerned will not participate in an independent review or determine the outcome of a complaint concerning their own activities.

The submission of a complaint will not in itself affect an existing Travelife recognition or certification. Where the investigation identifies non-compliance with applicable Travelife requirements, any resulting action will be taken in accordance with the relevant Travelife procedures.

11. Confidentiality and data protection

Complaints and related information will be handled confidentially and disclosed only to persons who require the information for the investigation, review and resolution of the complaint, or where disclosure is required by law.

Where information needs to be disclosed to another party in order to investigate a complaint fairly, only information relevant to that purpose will be shared.

Travelife will take appropriate measures to protect confidential information provided by the complainant and other parties.

Personal data will be processed in accordance with applicable data protection legislation and the Travelife privacy policy.

12. Records and review

Travelife will maintain records of complaints and their handling, including, as applicable:

- the complaint and supporting information;
- the initial scope review;
- relevant correspondence;
- investigation records;
- the outcome of the internal complaint-handling process;
- referral to and consideration by the Appeals and Complaints Panel;
- decisions and their supporting reasons; and
- corrective or follow-up actions taken.

Complaint records will be retained in accordance with the applicable Travelife record-retention requirements and relevant legal obligations.

Travelife will periodically review complaints and their outcomes to identify recurring issues, risks and opportunities for improvement.

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