ASF-GOV-005

Complaints and Appeals Procedure

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Approved by	Prof. Giorgi Pkhakadze, MD, MPH, PhD President, Accréditation Sans Frontières
Applies to	All applicants, accredited organisations, surveyors, committee members, and any other persons with a legitimate interest in ASF's accreditation activities
Related documents	ASF-GOV-003 Impartiality Policy ASF-GOV-004 Confidentiality Policy ASF-OPS-001 Accreditation Decision Framework ASF-OPS-002 Surveyor Competency Policy ASF-QMS-001 Internal Audit Policy
Supersedes	ASF-GOV-005 V2.0 (2026-11-21)
Next review	December 2031, or earlier on trigger

Version History

Version	Date	Nature of change	Approved by
V0.1	2026-10-28	Initial draft for internal review	—
V1.0	2026-11-11	President and Board review	ASF President
V2.0	2026-11-21	Approved and published	Prof. G. Pkhakadze, ASF President
V3.0	2026-12-01	Expanded to full procedure; comparative summary table, detailed timelines, Independent Appeals Panel constitution, systemic learning mechanism, and references added	Prof. G. Pkhakadze, ASF President

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1. Purpose

1.1 This procedure establishes the routes by which complaints about ASF's conduct and appeals against ASF's accreditation decisions are submitted, handled, and resolved. It ensures that all concerns about ASF's processes are treated seriously, investigated impartially, and resolved within defined timeframes — and that the outcomes are used to improve ASF's operations.

1.2 ASF operates two distinct routes: a Complaints route for concerns about how ASF conducts its processes, and an Appeals route for formal challenges to specific accreditation decisions. These routes are designed to be accessible, transparent, impartial, and free of charge to the complainant or appellant.

1.3 Both routes are aligned with the requirements of ISQua EEA Principle 7 (Complaints and Appeals) and with good practice in dispute resolution in conformity assessment bodies as described in ISO/IEC 17021-1:2015, clause 9.

1.4 Neither route affects the right of any party to seek remedy through courts or other external legal or regulatory processes in the applicable jurisdiction.

2. Overview — Complaints vs Appeals

2.1 The two routes are separate, distinct, and non-interchangeable. A complaint cannot be used to challenge an accreditation decision; an appeal cannot be used to raise a conduct concern. The following table summarises the key differences:

Feature	Complaints	Appeals
Who may use it	Any person or organisation affected by ASF's conduct or operations	Any applicant or accredited organisation subject to an accreditation decision
What it covers	How ASF conducted a process; conduct of a surveyor or committee member; failure to follow published policies; any other service quality concern	Formal challenge to an accreditation decision (Accreditation, Conditional Accreditation, non-accreditation, suspension, or withdrawal)
What it does NOT cover	Challenging a specific accreditation decision (use Appeals)	Process conduct matters (use Complaints)
Time limit	Within 90 days of the event giving rise to the complaint	Within 30 calendar days of formal notification of the decision
First-instance handler	ASF President (or SDC Chair if the President is the subject)	Independent Appeals Panel (not the original decision-makers)
Outcome	Finding with recommendations; corrective action where upheld	Decision affirmed, modified, or reversed; re-survey ordered if necessary
Final external route	External mediation or applicable jurisdiction courts	Same; no further internal route beyond the Panel

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2.2 Where a submission combines elements of both a complaint and an appeal, ASF notifies the submitter within 5 working days and requests clarification as to the route(s) intended. Where both routes are clearly intended, each is handled separately under the applicable procedure.

2.3 All complaints and appeals are handled with due regard to the confidentiality obligations in ASF-GOV-004. Information about a complaint or appeal is disclosed only to those who need it to handle the matter and to the party against whom the complaint or appeal is made, to the extent necessary for a fair hearing.

3. Section A — Complaints Procedure

3.1 What Constitutes a Complaint

3.1.1 A complaint is an expression of dissatisfaction with any aspect of ASF's conduct, service, or operations that does not concern a specific accreditation decision. Complaints may relate to:

- **(a)** the conduct of a surveyor during a survey — including allegations of discourtesy, bias, failure to follow the survey protocol, or departure from the requirements of ASF-GOV-003 (Impartiality Policy);
- **(b)** the conduct of a committee member, including failure to manage a declared conflict of interest;
- **(c)** ASF's failure to follow its published policies and procedures — including this procedure;
- **(d)** the quality, clarity, or timeliness of communications from ASF;
- **(e)** the accuracy or completeness of information published by ASF on france-asf.fr;
- **(f)** any other concern about how ASF has conducted itself, not involving a challenge to a specific accreditation decision.

3.1.2 A complaint is not the appropriate route for challenging an accreditation decision. If the concern is that a specific accreditation decision was wrong — in outcome or in legal basis — the Appeals route (Section 4) must be used.

3.2 Who May Submit a Complaint

3.2.1 Any person or organisation with a legitimate interest in ASF's accreditation activities may submit a complaint, including:

- **(a)** a current applicant or accredited organisation, or a facility that has been refused accreditation;
- **(b)** a surveyor or committee member subject to a conduct allegation (to contest the basis of the allegation);
- **(c)** a member of the public or a patient representative who has a concern about how ASF has represented itself or its programme;
- **(d)** any other person directly affected by ASF's conduct.

3.2.2 Anonymous complaints are accepted and investigated where sufficient factual detail is provided to enable investigation. However, ASF is unable to provide a response to an anonymous complainant.

3.3 Timeframes for Submission

3.3.1 Complaints must be submitted within 90 calendar days of the event giving rise to the complaint, or within 90 days of the complainant becoming aware of the relevant facts, whichever is

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later. Complaints submitted after this period may be declined, with the reason communicated to the complainant.

3.3.2 In exceptional circumstances — for example, where evidence was not reasonably available within the standard period — a later submission may be accepted at ASF's discretion, with the rationale documented.

3.4 How to Submit a Complaint

3.4.1 Complaints are submitted in writing to ASF at the contact address on france-asf.fr. The submission should include:

- **(a)** the complainant's name and contact details (unless submitting anonymously);
- **(b)** the specific conduct or action that is the subject of the complaint;
- **(c)** the date(s) on which the relevant events occurred;
- **(d)** any relevant documents or evidence the complainant wishes ASF to consider;
- **(e)** the outcome the complainant is seeking.

3.4.2 The complaint form (available on france-asf.fr) may be used but is not mandatory.

3.5 Complaint Handling Process

3.5.1 On receipt of a written complaint, ASF acknowledges it within 5 working days, confirms whether it falls within scope, and assigns it to the ASF President for investigation. Where the complaint concerns the President personally, it is assigned to the SDC Chair.

3.5.2 The investigating officer:

- **(a)** reviews all relevant documents and records;
- **(b)** interviews the complainant (where the complainant is identifiable and consents);
- **(c)** invites the person or function complained against to respond;
- **(d)** may seek input from an independent adviser where the matter is complex or sensitive.

3.5.3 A written finding is issued to the complainant within 30 calendar days of acknowledgement. The finding states: whether the complaint is upheld, partially upheld, or not upheld; the reasons; and any corrective action ASF will take. Where a full investigation cannot be completed within 30 days, an interim update is provided at that point and a revised timeline communicated.

3.5.4 Where a complaint is upheld and involves the conduct of an individual (surveyor or committee member), the matter is referred to the appropriate authority for action under the relevant ASF policy (ASF-GOV-003 for impartiality breaches, ASF-OPS-002 for surveyor competency concerns).

3.5.5 The complainant is informed of the outcome and, where the finding is partially or fully upheld, of the corrective action taken or planned.

> *ASF aims to resolve all complaints within 30 calendar days of acknowledgement. Complex complaints involving multiple parties or requiring independent review may take longer; in all cases the complainant receives a progress update at 30 days.*

3.6 Complaint Register and Escalation

3.6.1 All complaints — upheld, partially upheld, and not upheld — are recorded in the ASF Complaint Register with: the date received; the subject; the finding; any corrective action; and the date of closure. The register is reviewed at each annual management review (ASF-QMS-002).

3.6.2 A complainant who is not satisfied with the outcome of the first-instance complaint handling may request a review by writing to ASF within 14 calendar days of receiving the finding. The review

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is conducted by a person not involved in the original investigation. The review finding is final within ASF's internal processes.

3.6.3 Beyond ASF's internal review, a complainant retains the right to raise concerns with ISQua EEA (where the complaint relates to ASF's compliance with EEA Principles), or to seek remedy through applicable courts or regulatory bodies.

4. Section B — Appeals Procedure

4.1 What May Be Appealed

4.1.1 An appeal is a formal challenge to a specific accreditation decision issued by the Accreditation Decision Committee (ADC). The following decisions may be appealed:

- **(a)** a decision not to accredit (non-accreditation) following a full survey;
- **(b)** a decision to grant Conditional Accreditation (where the appellant contends that full accreditation was warranted);
- **(c)** a decision to suspend accreditation;
- **(d)** a decision to withdraw accreditation;
- **(e)** a decision on the outcome of a Corrective Action Plan review that results in one of the above outcomes.

4.1.2 A decision to grant full accreditation is not subject to appeal by the accredited organisation. A decision relating to a specific criterion finding within a survey report may be raised as part of an appeal against the overall decision, but individual criterion findings are not separately appealable.

4.2 Grounds for Appeal

4.2.1 An appeal must be based on one or more of the following grounds:

- **(a)** Procedural irregularity — the survey or decision-making process did not comply with ASF's published procedures in a way that materially affected the outcome;
- **(b)** Factual error — the decision was based on a material error of fact, which, if corrected, would require a different outcome;
- **(c)** Disproportionate weighting — specific criterion findings were weighted in a manner inconsistent with the ASF criteria classification framework (ASF-GOV-001, §6.2);
- **(d)** New material evidence — evidence that was not available at the time of the survey and that could not reasonably have been made available, which would materially affect the assessment of one or more criteria.

4.2.2 Disagreement with the professional judgement of the surveyor, without evidence of procedural irregularity, factual error, or disproportionate weighting, does not constitute valid grounds for appeal.

4.3 Timeframe for Submission

4.3.1 An appeal must be submitted within 30 calendar days of the formal notification of the decision being appealed. Late appeals are not accepted except in demonstrably exceptional circumstances (for example, where the appellant was prevented from submitting by circumstances beyond their control), at the discretion of the Appeals Panel Chair.

4.4 How to Submit an Appeal

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4.4.1 Appeals are submitted in writing to ASF at the contact address on france-asf.fr. The submission must include:

- **(a)** the appellant's name, organisation, and contact details;
- **(b)** the specific decision being appealed, with its date and reference number;
- **(c)** the grounds for appeal from the list in clause 4.2.1, with a clear statement of the facts supporting each ground;
- **(d)** all evidence on which the appellant relies, including any new material evidence under clause 4.2.1(d);
- **(e)** the outcome the appellant is seeking.

4.4.2 The appeal submission must be sufficiently detailed for the Appeals Panel to assess it without requesting supplementary information. Incomplete submissions are returned to the appellant with a description of what is missing, and the 30-day period continues to run from the date of original submission.

4.5 Preliminary Review

4.5.1 On receipt of a written appeal, ASF acknowledges it within 5 working days. The appeal is reviewed preliminarily by the ASF President (or, where the President was involved in the original decision, the SDC Chair) to determine whether:

- **(a)** the appeal was submitted within the required timeframe;
- **(b)** the decision is of a type that may be appealed (clause 4.1.1);
- **(c)** the stated grounds are within the permitted grounds (clause 4.2.1);
- **(d)** the submission is sufficiently complete.

4.5.2 An appeal that fails any of criteria (a)–(d) is declined at preliminary review, with a written explanation to the appellant. An appeal that meets all criteria proceeds to the Independent Appeals Panel.

4.6 Independent Appeals Panel

4.6.1 Appeals that pass preliminary review are considered by an Independent Appeals Panel (IAP). The IAP is constituted for each appeal and comprises:

- **(a)** a Chair — a senior professional with experience in healthcare accreditation, quality management, or dispute resolution, independent of ASF and of the organisation that submitted the appeal;
- **(b)** a clinical expert — a clinical professional with expertise relevant to the facility type under appeal;
- **(c)** a governance or quality systems expert — a professional with expertise in healthcare quality management or accreditation standards, independent of the original survey team.

4.6.2 No member of the original survey team and no member of the ADC that issued the decision under appeal may serve on the IAP for that appeal.

4.6.3 All IAP members complete a Declaration of Impartiality (Annex A of ASF-GOV-003) before the panel is constituted. Any declared conflict results in the substitution of that member.

4.6.4 IAP members are not remunerated by the appellant. ASF bears the cost of convening the IAP. This ensures that the cost of an appeal does not create a barrier for any appellant.

4.7 Appeals Hearing and Process

4.7.1 The IAP receives:

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(a) the complete appeal submission from the appellant;

(b) the original survey report, the ADC decision record, and all relevant supporting documents from ASF;

(c) any written response from ASF to the specific grounds of appeal, submitted within 15 calendar days of the IAP's constitution.

4.7.2 The IAP may, at its discretion, invite the appellant and ASF to make oral representations at a hearing conducted by video conference. Both parties are given equal opportunity to present their positions.

4.7.3 The IAP deliberates in private. Its decision is made by majority; the IAP Chair has a casting vote in the event of a tie. Deliberations are confidential.

4.7.4 The IAP issues a written determination within 45 calendar days of the constitution of the Panel. The determination:

(a) states whether the appeal is upheld, partially upheld, or dismissed;

(b) identifies the ground(s) on which the decision is based;

(c) where the appeal is upheld or partially upheld, specifies whether the accreditation decision is affirmed, modified, or reversed, or whether a new survey is required.

4.7.5 The determination of the IAP is final within ASF's internal processes. The appellant retains the right to seek remedy through external legal or regulatory processes.

4.8 Effect on Accreditation Status During Appeal

4.8.1 The submission of an appeal does not automatically suspend or reverse the decision under appeal. The accreditation status of the appellant at the time of appeal remains in effect until the IAP issues its determination, unless the IAP Chair grants a stay of the decision pending the appeal hearing on exceptional grounds.

4.8.2 A stay of a suspension or withdrawal decision may be granted where the IAP Chair determines, on a preliminary review, that there is a prima facie case for the appeal and that continued suspension or withdrawal would cause serious and irreversible harm to the appellant.

5. Systemic Learning

5.1 Complaints and appeals provide a critical source of intelligence about the performance of ASF's accreditation programme. ASF is committed to using the findings from complaints and appeals to drive continuous improvement.

5.2 The ASF Complaint Register (clause 3.6.1) and Appeals Register are reviewed at the annual management review (ASF-QMS-002). The review considers:

(a) the number and type of complaints and appeals received in the period;

(b) the proportion upheld, partially upheld, and dismissed;

(c) patterns or themes indicating systemic issues with surveyor conduct, criteria interpretation, or decision-making processes;

(d) the adequacy of corrective actions taken in response to upheld complaints and appeals;

(e) whether any complaint or appeal findings indicate a need to revise ASF's standards, policies, or procedures.

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5.3 Summaries of complaint and appeal activity — anonymised and aggregated — are published in ASF's annual transparency report on france-asf.fr. Individual complaint or appeal decisions are not published without the consent of the parties.

6. ISQua EEA Alignment

6.1 This procedure is designed to meet the requirements of ISQua IAP EEA Principle 7 (Complaints and Appeals), which requires that an accreditation programme has a documented, accessible, and impartial procedure for handling both complaints about the programme's conduct and appeals against accreditation decisions. Specific EEA requirements addressed include:

- **(a)** clear distinction between complaints and appeals;
- **(b)** defined timeframes for submission and response;
- **(c)** independence of the appeals decision from the original decision-makers;
- **(d)** accessibility — the procedure is free of charge to the complainant or appellant;
- **(e)** systemic learning from complaints and appeals outcomes.

6.2 The ASF ISQua EEA Crosswalk (ASF-EV-004) maps the provisions of this procedure to the applicable EEA criteria.

7. References

[1]	ISQua International Accreditation Programme (IAP). Principles for Standards. 6th Edition. ISQua External Evaluation Association, Dublin, Ireland, 2023.
[2]	International Organization for Standardization. ISO/IEC 17021-1:2015 — Conformity Assessment: Requirements for Bodies Providing Audit and Certification of Management Systems. §9 Complaints and Appeals. ISO, Geneva, 2015.
[3]	International Organization for Standardization. ISO/IEC 17011:2017 — Conformity Assessment: Requirements for Accreditation Bodies Accrediting Conformity Assessment Bodies. §6.7 Complaints and Appeals. ISO, Geneva, 2017.
[4]	International Organization for Standardization. ISO 10002:2018 — Quality Management: Customer Satisfaction — Guidelines for Complaints Handling in Organisations. ISO, Geneva, 2018.
[5]	Joint Commission International. JCI Accreditation Standards for Hospitals. 7th Edition. JCI, Oak Brook, IL, 2020. (Section: Survey Dispute Resolution)
[6]	Accreditation Canada. Qmentum Accreditation Program: Dispute Resolution Framework. Ottawa, 2022.
[7]	Greenfield D, Braithwaite J. Health sector accreditation research: a systematic review. Int J Qual Health Care. 2008;20(3):172–183. doi:10.1093/intqhc/mzn005
[8]	OECD. Recommendation of the Council on Consumer Dispute Resolution and Redress. C(2007)74. OECD, Paris, 2007.
[9]	European Parliament and Council. Directive 2013/11/EU on Alternative Dispute Resolution for Consumer Disputes. Official Journal of the European Union, L 165, 18 June 2013.
[10]	HQACI. Complaints and Appeals Procedure. ISQua EEA Accredited Document, 2026.

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[11]	Pomey MP et al. Accreditation: a tool for organisational change in hospitals? Int J Health Care Qual Assur. 2004;17(3):113–124.
[12]	International Accreditation Forum (IAF). IAF MD 2:2023 — Mandatory Document for the Transfer of Accredited Certification of Management Systems. §6 Disputes. IAF, 2023.

Formal Approval

Name and title	Signature	Date
Prof. Giorgi Pkhakadze, MD, MPH, PhD President, Accréditation Sans Frontières		2026-12-01

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