



Version 1.2

Compliant reporting

Complaint Policy

Despite all efforts to ensure that we all get along, it may happen that you, as a student or employee have comments or remarks. These can be about education in general, a particular service and/or behaviour of student/employee to student/employee.

In principle the comments and/or remarks and/or any feelings of discontent should be addressed where they are originated in the first place, i.e. the involved persons. This is where the responsibility lies for the quality of education in general and the care of an adequate response concerning problems or comments in particular. Establishing personal contact between the person(s) most closely involved is often initially preferable and in many cases this will lead solving the problem or resolving a feeling of discontent.

If for whatever reason it is not possible to solve the matter on hand, one can consider to submit a formal and confidentially complaint according to the procedure laid down in this complaint registration arrangement. In cases of fear for repercussions, the complaint may brought to the attention to the Confidentiality officer directly.

Goal

The purpose of the Complaint Procedure is to ensure a process is available to report misbehaviour or lack of quality within Clément Aviation Company B.V.

CAC holds strong policy regarding misbehaviour and lack of quality. Management of CAC encourage every employee or client not to withhold any relevant information. A preventive signal to all should be given regarding this policy.

Policy

No actions are tolerated against any employee, student or supplier of Clément Aviation Company BV which can damage some ones integrity, trust or self-value. Actions such as, not limited to:

- Aggression;
- Unfair treatment;
- Discrimination;
- Bullying ;
- Violence;
- Unsafe work environment;
- Work pressure; and
- Sexually undesirable behaviour.



CAC operates with a high quality standard regarding consulting and training. Lessons are given by professional instructors, and to keep that standard high, all reports regarding this lack of quality will be discussed with the responsible manager. Quality issues such as, but not limited to:

- Quality of training content and subjects;
- Quality of material used in training; and
- Quality of the organization.

Submitting a complaint

In order to submit a complaint a form is available on the website of CAC. The complaint form includes at least:

- the name and address of the person(s) involved;
- date;
- description of category
- a description of the situation where the complaint focuses on
- starting date of the course
- the location and date where the complaint occurred

If a complaint does not meet the requirements the person who filed the complaint will be given the opportunity to complete the missing items within a period of time determined by the Confidentiality officer

Role of the Confidentiality officer

Confidentiality officer receives and registers all complaints. The Confidentiality officer will ensure that follow up and processing has been completed and recorded.

The Confidentiality officer may attempt through negotiation or mediation to find a solution and/or settlement. He/she may contact the involved and accused person(s). He/she can, if desired start an investigation and has access to all relevant complaint information.

Staff and clients are expected to cooperate with the investigation started by the Confidentiality officer. When an investigation is completed, the matter shall be submitted to the management for final settlement and closure.

Reservation

CAC will not handle a complaint when the interest of the reporter is to deliberately damage CAC. CAC is not required to handle the complaint if the interest of the involved or the significance of the conduct is apparently insufficient. This is a subjective judgement and therefore the Confidentiality officer will request guidance externally.

If a complaint is not taken into consideration the reporter will be notified and receive a motivation as soon as possible but at least within a maximum of two working weeks after receiving the complaint.



Complaint procedure

Receipt of the complaint

- a. The complaint will be handled by the Confidentiality officer
- b. The petitioner will receive a confirmation of receipt of the submitted complaint within one working week.

Handling

- a. The person - who is being complained about – will be confronted with the complainant. This person will be given the opportunity to comment on the alleged in the complaint.
- b. The Confidentiality officer has the authority, if the nature of the complaint requires to do so, to inform the involved person(s) directly about his/her findings. If the involved person(s) is(are) satisfied with the findings, the obligation to proceed the procedure as mentioned in the following articles expires.
- c. When criminal acts is suspected been taken place, the police should be informed by the reporter.

Research

- a. Immediately after receiving a complaint, the investigation is started.
- b. For the purpose of the investigation, the Confidentiality officer has the authority to obtain verbal and written information freely within the organization.
- c. If the involved person is satisfied about the handling of the complaint, the Confidentiality officer will confirm this to the involved person(s). This confirmation will state a short description of the complaint and the way it has been dealt with.

Hearing

- a. The involved person(s) will be given the opportunity to be heard.
- b. The Confidentiality officer can decide to either alone or jointly with his/her colleagues set up a hearing in order to come to a decision which is basically binding for both parties.
- c. The hearing may be waived if the complaint is obviously unfounded, or if the student has expressed his or her wish not to exercise the right to be heard.
- d. A transcript of the hearing will be made.

Terms

- a. The complaint will be dealt with within six working weeks after receiving the complaint.
- b. The settlement can be postponed for up to four working weeks if there are urgent matters.
- c. The adjournment is notified in writing to the involved person(s).



Disposal

- a. When an investigation is completed, the Confidentiality officer will present a report containing the findings and judgement.
- b. The Confidentiality officer will send a version of the report to the involved person(s) and will inform them in motivated writing about his/her findings and any applicable conclusions.
- c. The Confidentiality officer shall send the report to the relevant management with recommendations, advice concerning the handled complaint and conclusions. If the Management considers not to follow the recommended advice, they will inform (well-founded) the Confidentiality officer within four working weeks.
- d. Management will with regard to the recommendation and/or the advice provided as mentioned in the previous point, determine the consequences of this within four working weeks.

Objections and appeals

Against a decision regarding the handling of a complaint no objection or appeal is possible.

Record keeping

Complaints, hearing records, appeals, etc. will be recorded and kept in file for at least 5 years by the Confidentiality Officer on a remote digital location.