

Solar Stewardship Initiative Complaints & Appeals v.1.0

November 2023



About the SSI Complaints & Appeals Mechanism

The objective of the Solar Stewardship Initiative (SSI) Complaints & Appeals Mechanism is to ensure that expressions of dissatisfaction raised with the SSI Secretariat are handled in a timely, comprehensive, consistent, transparent, and effective manner. This document explains the types of grievances the SSI Secretariat will review, the process for the review, and the potential outcomes.

Definitions

Appeal	Request by an organisation, Member of SSI or Assessment Body for reconsideration of any adverse decision made by SSI.
Appellant	A person, organisation or a representative of an organisation filing an Appeal requesting reconsideration of any adverse membership, approval or certification decision made by SSI.
Complaint	An expression of dissatisfaction, other than Appeal, by any person or organisation relating to the activities of the SSI, of an SSI-approved Assessment Body or of an SSI member.
Complainant	A person, organisation or a representative of an organisation filing a Complaint.
Direct Dialogue	Attempt to resolve a Complaint or Appeal through discussion, prior to appointing an Investigator.
Investigator	Individual appointed to review the Complaint or Appeal and who provides a proposed determination for review by the SSI Appeals/Complaints Panel for decision.
Respondent	SSI Secretariat, SSI Member, SSI-approved Assessment Body or Assessor against whom a Complaint or Appeal is lodged.

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1. Scope

The SSI Complaints and Appeals Mechanism defines how the Solar Stewardship Initiative (SSI) responds to expressions of dissatisfaction related to:

- **SSI Secretariat and Governance:**
 - The implementation of SSI policies, procedures and operating processes for which its management and Board has direct governance responsibility - referred to as a Complaint.
 - An SSI decision about the outcome of an assessment (certification decision) or a decision on SSI membership or a decision on approval status of an Assessment Body (AB) - referred to as an Appeal.
- **Member of the SSI:** Expression of dissatisfaction against a company that is a member of the SSI about not conforming or following the SSI Principles and/or the SSI Standard and/or the Claims & Labelling Rules.
- **Certified Member site of the SSI:** Expression of dissatisfaction against a Site that is certified about not conforming with or following the SSI Standard and/or the Claims & Labelling Rules.
- **Approved SSI Assessment Body or Assessor:** Expression of dissatisfaction against an SSI-approved Assessment Body or any Assessor associated with an approved assessment body.

Complaints should normally be lodged at the lowest level first before escalating. Wherever possible, this includes raising the Complaint directly with the person/organisation subject to the Complaint and giving the Respondent opportunity to respond and/or rectify the situation. For example, a Complaint against an AB should first be attempted to be resolved via the AB's own complaint mechanism.

A decision made by the SSI on membership, approval or certification should be lodged as an Appeal with the SSI directly.

A Complaints or Appeal will not be accepted if:

- It is a legal matter which should be handled through the legal system.
- It is trivial, vexatious or manifestly unfounded.
- It is not supported by objective evidence.

2. Submission of a Complaint or Appeal

To be accepted by the SSI as a formal Complaint, the Complaint must:

- Be in scope of the SSI Complaints & Appeals mechanism.
- Include specific and objective evidence to support any claim.
- Be submitted using the SSI Complaint & Appeals Form which can be accessed through the SSI website and which can be submitted anonymously; alternatively the Complaint may be submitted through the external provider referenced on the SSI website.
- Be submitted in English. Other languages may be accepted on a case-by-case basis. A request to submit a complaint in a different language should be agreed with the SSI in advance.

Any Complaint based upon hearsay cannot be accepted. In such a case, the SSI will request further information from the Complainant to assess whether the Complaint can be substantiated. If no response is received within thirty (30) calendar days, the Complaint will be considered withdrawn and therefore closed.

The SSI will aim to acknowledge receipt within five (5) calendar days of submission and will aim to accept or reject the Complaint within fifteen (15) calendar days of submission, based on the acceptance criteria. If the Complaint is rejected, the Complainant will be informed of the reason and their options for re-submitting the Complaint. If the Complaint is accepted, the Complainant can opt for informal mediation prior to proceeding.

To be accepted by the SSI as a formal Appeal, the Appellant must, in addition to the criteria for a formal complaint:

- Include details of the adverse membership, approval or certification decision and specify how SSI has not followed or correctly interpreted its own procedures/requirements.

The SSI and the Complainant/Appellant must sign a Confidentiality Agreement before the Complaint or Appeal can proceed.

3. Investigating a Complaint or Appeal

Once accepted as a Complaint or Appeal, SSI seeks to investigate it in a fair, balanced, and impartial manner, resolving it efficiently and effectively. Attempts will be made to resolve the Complaint or Appeal via direct dialogue. If direct dialogue does not result in a resolution, the SSI will then appoint an independent (externally-appointed) person to conduct the review of the Complaint/Appeal (“the Investigator”).

If the Complaint relates to a member of the SSI Secretariat, an externally appointed, impartial agent will always be appointed as the Investigator. Appeals will be investigated by individual(s) with knowledge and experience of the subject matter. All complaints/appeals must be investigated by an Investigator who has not directly been involved in the decision for which a reconsideration is being sought (Appeal) or resolution (Complaint).

The Investigator will reach out to all the parties (Complainant/Appellant and Respondent) to conduct the review, including seeking responses from the parties. The Investigator will objectively analyse and assess the Complaint/Appeal using all available and relevant information.

The Investigator may request further information from the Complainant/Appellant to determine the full nature and extent of the Complaint/Appeal, specifying that the Complainant/Appellant has thirty (30) calendar days to provide this. If the Complainant/Appellant fails to respond within thirty (30) calendar days following a request for information or an acknowledgement at any point in the investigation, the SSI reserves the right to consider the Complaint/Appeal withdrawn and therefore closed.

Based on the information provided, the Investigator will draft a report containing:

- A summary of the nature of the Complaint/Appeal.
- A summary analysis of the main arguments made by each party.
- A proposed determination as to the validity of the Complaint/Appeal, which will be one of the following:
 - Not upheld.
 - Not upheld, but with improvement plan proposed and included in the report.
 - Upheld, with a corrective action plan proposed and included in the report.

The draft report will be circulated to all parties to the Complaint/Appeal (Complainant/Appellant and Respondent) for comment and to identify any errors of fact within ten (10) calendar days. Comments received from the Parties should be included in a revised report which will go to a Complaints/Appeals Panel for final decision.

Any membership, approval or certification decision that is the subject of an Appeal will remain valid during the Appeals process until and unless a change is required as a conclusion to the Appeal.

4. Complaint or Appeal Decision

A Complaint/Appeal Panel will review the draft report as provided by the Investigator and will decide whether to accept the determination of the Investigator, and the improvement plan or corrective action plan if proposed. A final decision should aim to be reached via consensus. Depending on the nature of the Complaint/Appeal, a decision should be provided within four (4) weeks.

Within ten (10) calendar days of the final decision, the Investigator will inform the Complainant/Appellant and other Parties of the decision, along with any agreed improvement plan or corrective action plan and the timeline for implementation.

The Investigator will oversee any implementation of the improvement plan or corrective action and report back to the Complaint/Appeal Panel on any agreed milestones and on completion of the actions.

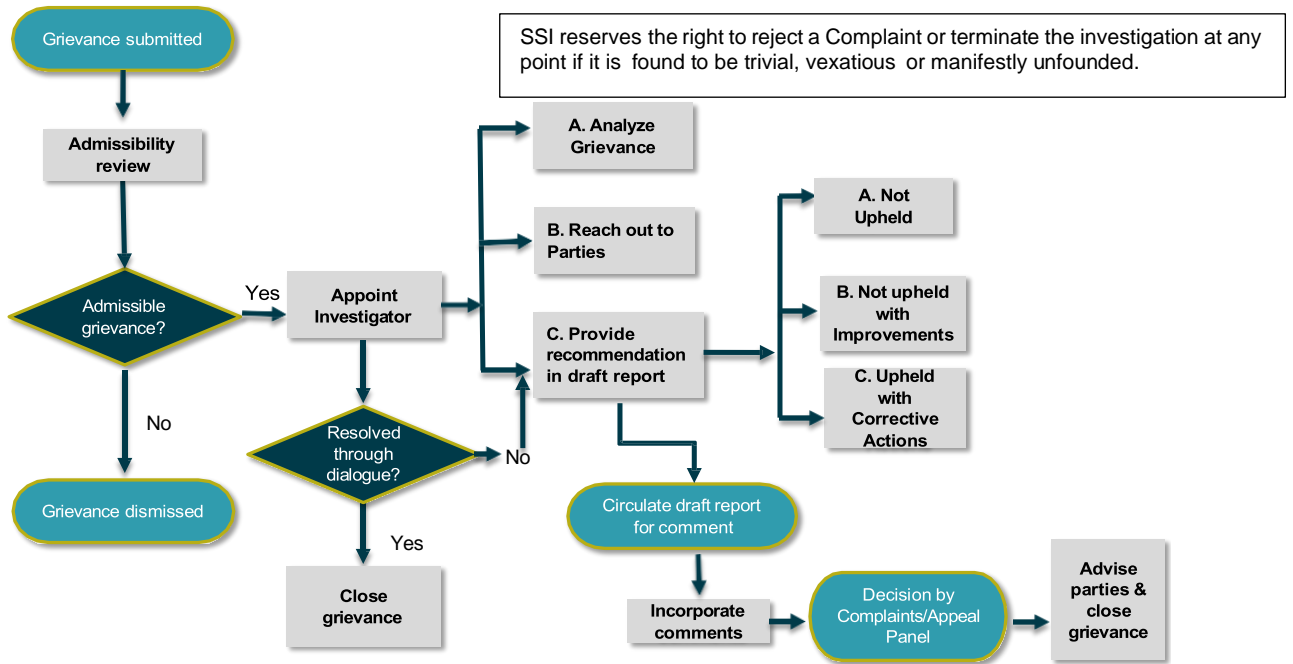


Figure 1: SSI Complaints & Appeals Process

5. Confidentiality

A Complainant raising a Complaint with the SSI need not disclose their identity if they choose to maintain anonymity. Where an individual raising a confidential concern identifies themselves, their identity will not be further disclosed to persons assessing the Complaint without the individual's consent. If Complaints are raised confidentially, SSI will make every effort to withhold the identity of those raising it and will only proceed to investigate the Complaint under the SSI Complaints & Appeals Mechanism if the person raising it agrees to the matter being so disclosed.

The right to anonymity does not apply if SSI believes there is a legal or regulatory obligation to disclose the concern.

6. Costs

SSI aims to minimise the costs of the Complaints & Appeals process for all parties. Where a formal investigation is contemplated or initiated, parties to the Complaint/Appeal will need to agree on the sharing of costs. An equal sharing of costs should be the starting point for negotiation. SSI will generally waive the costs of Complaints in the case of individual whistle blowers, unless the Complaint is found to be disingenuous.