



## **PKD Board Procedure for Handling Operational Complaints**

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Forwarded by: 2009 Chairperson

Reference Document(s): ICAO PKD COMPLAINTS HANDLING PROCEDURE (version 1.2 – April 2008)

### Introduction

1. The ICAO PKD Board has developed complaints handling procedures to ensure complaints are handled in an effective manner. This procedure represents the commitment of the PKD Board to fair and transparent dealings with PKD Participants, Users and other parties lodging complaints or other feedback.

### Who can complain what?

2. PKD Participants and Users are eligible to lodge an operational complaint. Such a complaint addresses the operation of the PKD and describes an obvious or felt misbehaviour or failure or any other non-compliance to the applicable technical regulations that occurred during regular use of the PKD.
3. An operational complaint cannot consist of general criticism that addresses the underlying technical, organisational, financial or other concepts of the PKD.
4. PKD Participants, Users and other parties such as prospective PKD Participants or interested States may submit feedback concerning the PKD. Such feedback is not limited with respect to the matter addressed and may touch technical, organisational, financial or other concepts of the PKD or proposals for their improvement. However, those items are usually more difficult to resolve and it may take longer to come to an adjudication by the Operator, the PKD Board or the ICAO Secretariat.
5. Operational complaints will be treated with higher priority than feedback. In case of doubt the PKD Board assigns the category "complaint" or "feedback".

### What do complaints or feedback consist of?

6. PKD Participants, Users and other parties making complaints or giving feedback will substantiate their assertions in writing. The electronic form on the [PKD Board website](#) may be used.
7. The following categories of the electronic form should be substantiated.
  - a) name of person / organisation making the complaint or giving feedback
  - b) e-mail address of person / organisation making the complaint or giving feedback
  - c) description of problem / issue as comprehensively as possible
  - d) the date the complaint or feedback is lodged / received
  - e) which organisation is being complained about or no entry in case of feedback

8. Where an e-mail is forwarded the body of the e-mail should contain the categories a) through e).
9. Where a fax is forwarded the body of the fax should contain the categories a) through e). The template in Attachment A may be used for faxes. Usually fax communication is slower than the use of the electronic form or the e-mail channel.

### **Who are complaints or feedback addressed to?**

10. Complaints or feedback will be received by the ICAO Secretariat via the electronic form, e-mail or fax.
11. After a preliminary analysis by the ICAO Secretariat complaints are directed to
  - a) the Operator, where the complaint concerns the operation proper of the PKD,
  - b) the ICAO Secretariat, where the complaint concerns registration formalities, verification and upload of CSCA certificates, fee payments or other administrative issues, and
  - c) the PKD Board, where the complaint concerns interpretation or application of the MoU, the PKD Regulations, the PKD Procedures or other basic documents or the general performance of the PKD Board.
12. After a preliminary analysis by the ICAO Secretariat feedback is directed to the PKD Board.
13. All e-mail communications regarding complaints or feedback are to be copied to the ICAO Secretariat e-mail contact address provided at the [PKD Board website](#).
14. Further contact information can be found in the PKD Board participant list that is available in the PKD document download area of the [PKD Board website](#).

### **What happens once a complaint or feedback has been lodged?**

#### Step 1 – Acknowledgement

15. Complaints will be acknowledged by the Operator, the ICAO Secretariat or the PKD Board, as applicable, within seven working days of the complaint being received. Where no acknowledgement within this period is given the ICAO Secretariat should bring the original complaint to the attention of the PKD Board Chairperson.
16. Feedback will be acknowledged by the PKD Board within seven working days of the feedback being received. Where no acknowledgement within this period is given the ICAO Secretariat should bring the original feedback to the attention of the PKD Board Chairperson.
17. It is assumed that complainants or feedback authors will act in good faith.

#### Step 2 – Assessment

18. The establishment of the facts and the following assessment may require correspondence with the complainant or another party. Any correspondence in that process should be copied to the ICAO Secretariat.
19. Once established the facts will be assessed to identify a possible resolution. Resolution may include, but is not limited to:
  - a) “explanation” and/or
  - b) “apology” and/or
  - c) “recommendations” for change(s) to PKD procedures or documentation.

### Step 3 – Resolution

20. Where possible complaints will be resolved, usually by “explanation” and/or “apology”, at the time an acknowledgement is provided.
21. In other cases the organisation that acknowledges the complaint can advise the complainant of the further period, up to 21 working days, within which the complaint will be resolved.
22. In case there is no resolution of the complaint possible within seven or 21 working days a time span is set within which a resolution is expected to be found. The complainant will be informed about that.
23. In case of feedback the PKD Board indicates in the acknowledgement the expected period within which the feedback is expected to be resolved. Should this not be possible the expected period for resolution will be indicated within 21 working days.
24. If complainants or feedback authors are not satisfied with the resolution of a complaint or feedback they may refer the complaint or feedback as well as the resolution to the PKD Board, through the PKD Board Chairperson, for review.
25. If the complaint or feedback concerns interpretation or application of the MoU or the performance of the PKD Board and is not able to be resolved directly with the PKD Board, the complainant or feedback author may submit the complaint or feedback to the ICAO Secretariat for referral to the ICAO Council for a recommended resolution.

### **What can I expect to see in the resolution?**

26. The resolution will include, but is not limited to:
  - a) confirmation of the issue that has been raised,
  - b) a description of the facts,
  - c) an assessment of the complaint or feedback,
  - d) the resolution, and
  - e) options available if the complainant or feedback author remains unsatisfied.
27. Where a complaint or feedback results in changes to procedures, policies or other documentation, the PKD Board will notify the ICAO Secretariat where the changes are to be made. The changes will be implemented through other processes than this PKD Board Procedure for Handling Operational Complaints (e.g. PKD Board action item, NTWG change of Document 9303, ICAO Council change of MoU, etc.).

**Accountability**

28. The PKD Board Chairperson may seek progress reports from the ICAO Secretariat or the Operator where advice suggests timeliness standards for acknowledgement or resolution have not been met.

**Reporting**

29. The PKD Board Annual Report submitted by the PKD Board Chairperson shall include a summary of important complaints or feedback received and details of the resolution thereof.

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**Attachment A**

name of person / organisation making the complaint or giving feedback	
fax number of person / organisation making the complaint or giving feedback	
description of problem / issue as comprehensively as possible	
the date the complaint or feedback is lodged / received (dd/mm/yyyy)	
which organisation is being complained about or no entry in case of feedback	
<input type="checkbox"/>	PKD Operator
<input type="checkbox"/>	ICAO Secretariat
<input type="checkbox"/>	PKD Board