

## P12e Complaints and appeals

### Complaints

- 1.1 ISAC's rules on complaints can be found in R01 section 16.
- 1.2 ISAC's officer registers received complaints into the records classification system and sends a confirmation of receipt by email to the complainant. The complaint is also registered in the NC-register.
- 1.3 If the complaint is valid the ISAC's manager delegates the complaint to the appropriate ISAC's employee for handling. If a complaint is about a CABs ISAC shall, if applicable, first check whether the CAB has handled the complaint.
- 1.4 ISAC's officer investigates the complaint, documents key actions and informs the complainant on the progress of the complaint if needed.
- 1.5 ISAC reserves the right to embark on extra assessments, if necessary, to investigate complaints.
- 1.6 ISAC's officer informs ISAC's manager about the results of the complaint investigation and recommends actions, where relevant.
- 1.7 When a complaint's investigation is over the results are documented. ISAC ensures that the results are reviewed by individuals not involved in the activities in question.
- 1.8 ISAC informs the complainant about the results of the investigation and, if applicable, any actions that ISAC takes in regard to the complaint, thus finalising the complaint process.
- 1.9 The complainant has two weeks to object the results of the complaint process.
- 1.10 Complaints are confidential between ISAC and the CAB. The CAB is however not informed about the source of the complaint unless agreed by the source.

### Appeals

- 2.1 ISAC's rules on appeals can be found in R01 section 15.
- 2.2 ISAC receives the request for appeal on the behalf of the decision-making committee and sends a confirmation of receipt by email to the CAB.
- 2.3 ISAC's officer registers the request into the records classification system and convenes a decision-making committee meeting.
- 2.4 The CAB's reasoning for appealing the decision is sent to the decision-making committee in a timely manner before the meeting. The CAB can request a meeting with the decision-making committee to review its reasoning.
- 2.5 The decision-making committee reviews the case.
- 2.6 If the decision-making committee agrees with the reasoning from the CAB a new decision is made, and a notification thereof is sent to the CAB.

- 2.7 If the decision-making committee stands by the original decision, ISAC sets up an ad hoc appeal committee which takes the decision for a substantive consideration. The ad hoc appeal committee shall be composed of individuals not involved in the activities in question. The ad hoc committee operates in accordance with ISAC's specific rules (ACD-0015) and is responsible for reviewing and taking a position on the decision. The results of the ad hoc appeal committee are submitted to the decision-making-committee for information.
- 2.8 ISAC will notify the CAB of the ad hoc committee's decision, which is final. The CAB is informed about its right to appeal to a higher authority in accordance with Article 26 of the Administrative Act No. 37/1993. This marks the end of ISAC's appeal process.