



**Global
Platform®**

The standard for
secure digital services
and devices

GlobalPlatform Technology

Complaint & Appeals Process Document

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Contents

1	Introduction	4
1.1	Audience	4
1.2	IPR Disclaimer	4
1.3	References	4
1.4	Terminology and Definitions	5
1.5	Abbreviations	5
1.6	Revision History	5
2	Processes for Complaints and Appeals	7
2.1	Responsibilities Regarding Complaints and Appeals	7
2.2	Complaint Procedure	8
2.2.1	Conditions	8
2.2.2	Process	8
2.3	Appeal Procedure	9
2.3.1	Filing	9
2.3.2	Acceptance	9
2.3.3	Process	9

Tables

Table 1-1: References	4
Table 1-2: Terminology and Definitions	5
Table 1-3: Abbreviations	5
Table 1-3: Revision History	5

1 INTRODUCTION

This document outlines the procedures for managing complaints and appeals related to GlobalPlatform's technical development activities and the operations of its Certification Body. It ensures that all concerns are addressed in a fair, transparent, and timely manner, in alignment with GlobalPlatform's commitment to quality, impartiality, and continuous improvement.

1.1 Audience

This document is intended primarily for all parties involved in the management of complaints and appeals related to the development of GlobalPlatform technical work and Certification Body activities, as well as any interested party seeking to submit such a complaint or appeal to GlobalPlatform.

1.2 IPR Disclaimer

Attention is drawn to the possibility that some of the elements of this GlobalPlatform specification or other work product may be the subject of intellectual property rights (IPR) held by GlobalPlatform members or others. For additional information regarding any such IPR that have been brought to the attention of GlobalPlatform, please visit <https://globalplatform.org/specifications/ip-disclaimers/>. GlobalPlatform shall not be held responsible for identifying any or all such IPR, and takes no position concerning the possible existence or the evidence, validity, or scope of any such IPR.

1.3 References

The table below lists references applicable to this specification. The latest version of each reference applies unless a publication date or version is explicitly stated.

Table 1-1: References

Standard / Specification	Description	Ref
GP_PRO_063	Certification Body Quality Manual	[GPCB]
GP_PRO_160	Process and Procedures Manual	[GPPM]

1.4 Terminology and Definitions

Selected terms used in this document are defined in [GPCB] and [GPPM] and additional terms are included in Table 1-2..

Table 1-2: Terminology and Definitions

Term	Definition
Complaint	<p>in ISO/IEC 9000:2015, clause 3.9.3</p> <p>A complaint is the expression of dissatisfaction made to an organization, related to its product or service or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected.</p> <p>in ISO/IEC 17000:2020, clause 8.7:</p> <p>expression of dissatisfaction, other than appeal, by any person or organization to a conformity assessment body or an accreditation body, relating to the activities of that body, where a response is expected</p>
Appeal	<p>in ISO 17000:2020, clause 8.3</p> <p>request by the person or organization that provides, or that is, the object of conformity assessment to a conformity assessment body or an accreditation body for reconsideration by that body of a decision it has made relating to that object</p>

1.5 Abbreviations

Table 1-3: Abbreviations

Abbreviation	Meaning
CB	Certification Body

1.6 Revision History

GlobalPlatform technical documents numbered n.0 are major releases. Those numbered n.1, n.2, etc., are minor releases where changes typically introduce supplementary items that do not impact backward compatibility or interoperability of the specifications. Those numbered n.n.1, n.n.2, etc., are maintenance releases that incorporate errata and precisions; all non-trivial changes are indicated, often with revision marks.

Table 1-4: Revision History

Date	Version	Description
October 2020	1.0	Public Release
May 2023	1.1	<p>Specifies that the Quality Manager is responsible for investigating and assessing certain complaints.</p> <p>Specifies responsibilities for investigating issues related to CB quality management.</p>

Date	Version	Description
June 2024	1.2	Specifies the alternate person responsible in case the original person responsible for investigating and assessing complaints is the subject matter of the complaint. Specifies the period allowed for any extension of investigation and filing of appeal. Specifies the scope of the subject matter allowed in the appeal.
July 2025	1.3	s removed in Appeal in the title New reference for [GPPM] in Table 1-1 Table 1-2 added with complaint and appeal definition 2-1, 2-2 and 2-3 aligned with the definition

2 PROCESSES FOR COMPLAINTS AND APPEALS

2.1 Responsibilities Regarding Complaints and Appeals

The Operations Secretariat is responsible for receiving and maintaining records of complaint and appeal related to the development of GlobalPlatform technical work and Certification Body activities, and providing formal notice of the outcome to the complainant or appellant.

The following complaint categories are distinguished:

- Complaint on specification development
- Complaint on member publications
- Complaint on Certification Body processes

For complaint relating Certification Body processes :

- The Quality Manager is responsible for investigating and assessing complaints.
- The Certification Director is responsible for making a final decision on complaints .

For complaint relating to specification development and member publications:

- The Operations Secretariat is responsible for investigating and assessing complaints.
- The Chief Technology Officer is responsible for determining a final decision on complaints.

For appeal relating to Certification Body decision:

- The Quality Manager is responsible for investigating and assessing appeal.
- The Certification Director is responsible for making a final decision on appeal.

In any case where the action of the person responsible for investigating and assessing a complaint or an appeal is the subject matter of the complaint or appeal, that person shall abstain from the investigation and assessment, and the Executive Committee will nominate a replacement for this item.

2.2 Complaint Procedure

This section details procedures for complaints that concern the actions and decisions of GlobalPlatform and its groups and that are related to the complaint categories noted in section 2.1.

2.2.1 Conditions

1. Complaints may only be submitted by persons or organizations that are directly, materially, or adversely affected by the activities related to the complaint.
2. Complaints filed with GlobalPlatform must:
 - a. be introduced within 30 days after GlobalPlatform has officially communicated the result of a Laboratory Accreditation, a Test Tool Qualification, or a Product Certification, or has published a specification or member document;
 - b. be accompanied by documentation providing all relevant details of the complaint;
 - c. include any supporting evidence or documentation, such as statements and explanations related to the issue; and
 - d. not be repeated unless a minimum of 6 weeks has passed.
3. The person or organization making the complaint shall not derive any rights or presume the validity of the claim based on the fact that GlobalPlatform is investigating the complaint.

2.2.2 Process

1. The complaint shall be submitted by email sent to the Operations Secretariat at: secretariat@globalplatform.org.
2. The complaint, along with the personal and/or company information of the complainant (full name, address, and other contact details), shall include the complainant's personal opinion about the assessment and/or conclusion, the supporting documentation noted in section 2.2.1 subsection 2.b and c, and reasons for disapproval with the decision reached, as well as the settlement being sought.
3. The Operations Secretariat will acknowledge receipt of the complaint, assign a complaint reference number (CPYYYYMMnn), and notify the person responsible noted in section 2.1 for investigating and assessing the complaint.
4. The person responsible will investigate and assess the complaint, taking into account advice from the technical experts, where necessary, to determine the facts of the case and an appropriate response or resolution. This investigation will be completed within 30 days from receipt of the complaint. If more time is needed, the complainant will be notified of progress and estimated timeline. Extension of investigation shall be no more than 14 days.
5. Records of complaints, investigations, and proposed resolutions will be provided to and maintained by the Operations Secretariat.
6. Proposed resolutions will be reviewed and ratified by the person responsible for making a final decision prior to onward communication.
7. The Operations Secretariat will communicate outcomes or proposed resolutions to the complainant.
8. The complaint will be formally closed based on complainant's feedback, or if the complainant does not give feedback in the following 14 days after step 7.

Note that the Operations Secretariat will compile a summary of all submitted complaints, along with outcomes or resolutions, for review by the GlobalPlatform Board of Directors, a minimum of once per year.

2.3 Appeal Procedure

This procedure stipulates the way in which an appellant may appeal a decision of GlobalPlatform Certification Body .

2.3.1 Filing

1. Appeals may only be submitted by persons or organizations that are directly, materially, or adversely affected by the decision related to the appeal.
2. The appeal must be submitted within 14 days after the disputed decision communicated to the complainant.
3. The appeal shall be submitted by email sent to the Operations Secretariat at: secretariat@globalplatform.org.

2.3.2 Acceptance

1. If the appeal is submitted within the required timeline and by the appropriate person or organization (as set forth in section 2.3.1), and no prior appeal has been submitted, the appeal will be accepted by GlobalPlatform, with no undue burden imposed on the appellant.
2. When an appeal has been accepted by GlobalPlatform, the appeal is considered formal and will be dealt with according to this procedure.

2.3.3 Process

1. Upon acceptance of an appeal, the Operations Secretariat will promptly acknowledge receipt and assign an appeal reference number (APYYYYMMnn).
2. The person responsible noted in section 2.1 for investigating and assessing appeals will be notified of the filed appeal.
3. The person responsible will investigate and assess the appeal, taking into account advice from the technical experts where necessary, to determine the facts of the case and an appropriate response or resolution. This investigation will be completed within 30 days of receipt of the appeal. If more time is needed, the appellant will be notified of progress and estimated timeline. Extension of investigation shall be no more than 14 days.
4. All appeals will be handled by the relevant parties promptly and in a fair, unbiased, and impartial manner.
5. Records of appeals, investigations, and proposed resolutions will be provided to and maintained by the Operations Secretariat.
6. Proposed resolutions will be reviewed and decided expeditiously by the person responsible prior to onward communication.
7. The Operations Secretariat will communicate outcomes of the final decision to the appellant and the appeal is final and closed. Note that appeals may not be repeated or re-submitted.