



GSTC Grievance Procedure for Accreditation

version 2.0

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Document History

Version	Date of Approval	Description of Amendment	Affected Section/Page
1.0	1 October 2023	New Document	N/A
2.0	6 September 2024	<ul style="list-style-type: none">- Updated the normative reference and version number of the referenced documents- Edited spacing between sections- Section Procedure for Appeals removed- Section name "Appeals for Investigation Outcome" changed into "Appeal Procedure"- Section number of "Procedure for	Entire Document

		Complaints", "Procedure for Concerns and Feedback", " Appeal Procedure", "Monitoring and Evaluation", "Record Keeping" and " Expenses" changed	
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Document Controls

This is version 2.0 of the GSTC Grievance Procedure for Accreditation, 2024.

Document Approval: GSTC Assurance Director

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The Global Sustainable Tourism Council

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1. Introduction

- 1.1. Before a formal complaint procedure is submitted, stakeholders must first attempt to settle disputes informally, preferably at the lowest level. Both parties should aim to resolve the dispute in a cordial and professional manner. If it is not possible to resolve complaints at an informal level, a formal complaint may be submitted.

2. Purpose and Scope

- 2.1. This procedure sets out the process for resolving any grievances relating to the GSTC's accreditation activities and the broader conduct of the GSTC's accreditation activities throughout its operations. At GSTC, we are committed to upholding the highest standards in our accreditation program and ensuring transparency and fairness in all operations.
- 2.2. The GSTC Grievance Procedure for Accreditation is designed to establish a structured approach for handling complaints or concerns regarding the following:
 - 2.2.1. Any issues related to the adherence of the GSTC personnel to the GSTC Accreditation Requirements and relevant procedures.
 - 2.2.2. Matters concerning the actions of a GSTC-Accredited Certification Body (CB) when the complaint has not been adequately resolved by the CB.
- 2.3. The primary objective of the GSTC Grievance Procedure Accreditation is to evaluate the performance and decision-making of the GSTC, Accredited CBs, or other relevant stakeholders to ensure compliance with relevant procedures and accreditation requirements.
- 2.4. It is important to note that the Accreditation scope does not encompass the direct issuance, suspension, reinstatement, or termination of certificates issued by Accredited CBs. Complaints against entities (e.g., hotels) certified by an Accredited CB about their compliance with the GSTC Certification

requirements shall be managed and processed by the CB who issued the certificate according to the CB's own grievance mechanism.

2.5. This procedure applies to both the CB accredited by GSTC and the CB that has transitioned their accreditation to the GSTC Accreditation Program.

2.6. Complaints submitted anonymously or with a request for anonymity will not be processed according to the procedure outlined in this document.

3. Responsibility

3.1. GSTC holds the primary responsibility for managing the grievance mechanism. GSTC will review the content of this document regularly.

3.2. GSTC is responsible for appointing an impartial investigator or team of investigators, should this role be needed in the case of a Complaint Investigation. The selection of investigators shall be based on their expertise, neutrality, and absence of conflicts of interest with any involved parties.

4. Principles

4.1. The grievance must be about compliance with the GSTC's standards, rules, policies, and procedures directly related to GSTC. The GSTC Grievance Procedure Accreditation is guided by the following principles:

- **Impartiality:** The process should not be open to any forms of influence which might raise doubts about the objectivity of the decisions taken.
- **Transparency:** The processes adopted should be transparent and available for scrutiny by stakeholders.
- **Confidentiality:** All information directly or indirectly disclosed during the process by all parties involved shall be treated as confidential. Information will not be shared with any third party without prior written consent from the GSTC in advance.

5. Normative References (Associated Documents)

- GSTC Accreditation Manual for Certification of Hotel/Accommodation & Tour Operator in its latest version
- GSTC Accreditation Manual for Certification of Destination in its latest version
- GSTC Accreditation Procedure in its latest version
- GSTC Grievance Mechanism in its latest version

6. Terms and Definitions

- 6.1. For Recognition and Accreditation related terms, refer to the latest version of the GSTC Accreditation Glossary.

7. Procedure for Complaints

The grievance procedure consists of several stages, including the submission of a grievance, an initial review, an investigation, communication with the complainant, findings and recommendations, the decision and resolution, and, if necessary, an appeal process. Each stage is designed to ensure a comprehensive and fair resolution process.

7.1. Submission of Formal Complaints

7.1.1. Individuals or entities with a grievance related to GSTC's Accreditation Program should follow these steps to initiate a grievance:

7.1.1.1. Initiate the grievance submission process by documenting the nature of the grievance.

7.1.1.2. Offer a clear and succinct description of the matter, incorporating pertinent dates, times, and the individuals involved as determined in the GSTC Grievance Submission Form for Accreditation.

- 7.1.1.3. Verify the completeness and accuracy of all accompanying documentation, ensuring it is attached to the grievance form.
- 7.1.1.4. Submit grievances through the [GSTC Grievance Submission Form](#) via email.
- 7.1.1.5. If applicable, specify submission deadlines and the operating hours for physical submissions.
- 7.1.2. Formal complaints should be lodged by sending the GSTC Grievance Submission Form via email. GSTC is responsible for addressing inquiries related to the submission of complaint forms or grievances sent to complaints@gstcouncil.org.
- 7.1.3. Complaints that fulfill all the specified requirements below will be considered for further assessment:
 - 7.1.3.1. Detailed Description of the Grievance:
 - a. *Nature of the complaint.*
 - b. *A comprehensive explanation of the events and issues leading to the grievance.*
 - c. *Any correspondence relevant to the grievance.*
 - d. *Supporting evidence (e.g., emails, documents, photographs, etc.).*
 - e. *Indication of any prior attempts to address the issues with the organization and their responses, if applicable.*
 - f. *If a remedy is sought, a clear description of the desired outcome.*
 - 7.1.3.2. Contact Information:
 - a. *Specify the organization against which the complaint is filed.*

7.1.4. As the working language of the GSTC is English, complainants may be requested to provide translations of evidence submitted in other languages to facilitate the evaluation process.

7.1.5. By submitting a formal complaint, the complainant agrees to accept the final decision of the grievance procedure. Should the complainant disagree with the outcome, they may submit a formal appeal.

7.1.6. Grievances are expected to be lodged within a six-month window from the date of the incident or issue. Grievances submitted beyond this designated timeframe may be subject to further examination. GSTC will acknowledge receipt of the complaint via email within 10 working days of receipt of the complaint.

7.2. Initial Review of Complaints

7.2.1. Upon receipt of a grievance, the designated staff responsible for grievance handling within GSTC will initiate an initial review process to evaluate the grievance's validity. This stage encompasses the following key steps:

7.2.1.1. Receipt Confirmation: GSTC will promptly acknowledge the receipt of the grievance within 10 working days of receipt of the complaint and, if deemed necessary, issue a reference number for tracking and documentation purposes.

7.2.1.2. Scope Assessment: The grievance will undergo assessment to ascertain whether it falls within the purview of GSTC Accreditation Program.

7.2.1.3. Validity Check: GSTC will perform an evaluation to determine if the grievance includes adequate information and evidence, warranting further consideration and potential investigation.

- 7.2.2. Should the complaint be found not admissible under the GSTC grievance mechanism scope after the initial review, the complainant will be notified accordingly, indicating the reason(s).
- 7.2.3. In cases involving Complaints about GSTC (including personnel and/or performance), GSTC may recommend direct communication as the preferred resolution method, as deemed appropriate.
- 7.2.4. Should GSTC find it necessary during the initial review or direct communication process, the approach may be adjusted to address the complainant's claims or grievances more effectively.
- 7.2.5. When a Complaint pertains to the CB, GSTC will inform the CB that a Complaint has been received and that GSTC has initiated an initial review process.
- 7.2.6. GSTC may reject a Complaint in various circumstances, including but not limited to the following cases:
- a. When the Complaint is submitted anonymously or when the complainant requests anonymity during the grievance process.
 - b. When the Complaint lacks sufficient, appropriate, or substantial evidence.
 - c. When the Complaint falls outside the scope defined in Section 2.
 - d. When the Complainant(s) has not made genuine attempts to resolve the issue locally. For Complaints related to the CB, the Complaint must have first been directed to the CB and answered by the CB.
 - e. When the Complaint solely pertains to events that occurred either before Certification or Accreditation or after the Withdrawal of Certification or Accreditation.
 - f. When the Complaint about the CB is submitted more than six (6) months after the CB's rejection or closure of the Complaint.

- g. When the Complaint about GSTC is submitted more than six (6) months after the issue(s) occurred.
- h. When compelling evidence suggests that the Complaint is frivolous, malicious, trivial, vexatious, or intended solely to gain a competitive advantage.

7.2.7. When a Complaint is not accepted for Appraisal, GSTC will provide the Complainant with a formal notification outlining the reasons for rejection, and the Complaint will be closed.

7.2.8. If a complaint is referred back to the CB, GSTC will also close the complaint. If the complainant remains dissatisfied even after the CB has addressed their concerns, they have the option to submit a new complaint to GSTC.

7.2.9. All parties affected by the complaint will be informed of the results of the initial evaluation.

7.3. Appraisal

7.3.1. Within twenty (20) days after concluding the initial review, GSTC will begin an evaluation to decide on the formal acceptance of the Complaint for investigation. GSTC will notify the appraisal outcome as follows:

7.3.1.1. If the Complaint does not meet the requirements for investigation, GSTC will specify the reason(s) for such non-acceptance. In such instances, GSTC will close the Complaint.

7.3.1.2. If the Complaint is accepted for investigation, GSTC will detail the reasons for acceptance, provide information on the scope and process of the investigation, and identify the parties involved in the Complaint. In this scenario, the Complainant will be requested to sign a confidentiality agreement before GSTC proceeds with the investigation.

7.3.2. Throughout the appraisal process, GSTC may seek additional information from all the parties involved, including the Complainant. If the parties involved fail to respond within fourteen (14) days from the date of GSTC's request for information, GSTC reserves the right to close the Complaint.

7.4. Investigation of Complaints

7.4.1. The GSTC-appointed investigator or a team of investigators will evaluate the information submitted by the complainant. A decision on the merits of the complaint and a summary of the investigation will be prepared within 30 working days of initiating a formal investigation of the complaint. The final response will be communicated to the complainant and all the parties involved in the process. If there is any delay in the investigation process, immediate notification will be provided to all involved parties.

7.4.2. If GSTC decides to proceed with the assessment during the investigation, the timelines established above will be adjusted to accommodate the planning and finalization of the investigation report. The parties involved in the Complaint will be informed of the finalization date and the expected duration of the delay.

7.4.3. Complaint investigations, when applicable, should focus on a specific point in the subject under investigation.

7.4.4. In the event that the complainant is unresponsive for more than thirty (30) days or conducts themselves in a disrespectful or unprofessional manner during the investigation, GSTC reserves the right to close the complaint. GSTC may still choose to address the concerns raised in the complaint without requiring active participation from the complainant.

7.4.5. The investigator or the investigation team appointed by GSTC must have no conflicts of interest (COI). The investigator or investigation team should possess the technical knowledge or expertise relevant to the investigated subject.

- 7.4.6. The investigation may involve interviews or other methods to gather evidence from the complaint and relevant parties.
- 7.4.7. Before concluding the investigation, GSTC will distribute the draft complaint investigation report to all parties involved for their input, allowing a fourteen-day (14-day) window for comments.
- 7.4.8. GSTC strongly encourages each party involved to provide their comments transparently to the other parties involved.
- 7.4.9. GSTC shall respond to all comments.
- 7.4.10. GSTC retains sole discretion in editing or adjusting the report and its recommendations based on the feedback received.
- 7.4.11. Upon request, GSTC has the option to extend the deadline for comments by up to 30 calendar days. Such an extension will consequently postpone the original investigation timelines.
- 7.4.12. GSTC ordinarily circulates draft reports for comments only once. However, in exceptional circumstances involving substantial changes to conclusions or new evidence emerging, and if comments from one party have not been shared with all parties, GSTC reserves the option to circulate the draft report a second time. This decision will lead to a delay in the original investigation timelines.
- 7.4.13. Throughout the investigation process, GSTC will maintain open communication with the parties involved, providing updates on progress, any delays, and the reasons behind such delays.
- 7.4.14. While considering the results of the independent objection, Complaint, or Appeal systems operated by relevant parties, GSTC will not be bound by their outcomes.
- 7.4.15. Investigations of complaints may lead to various resolutions, including but not limited to:
 - a. Improvement of the GSTC procedures

- b. Clarification on public information
- c. Provide further information/ technical assistance
- d. Request the CB to provide further information of compliance to the requirements
- e. Request a witness audit to the CB
- f. Schedule an anticipated renewal of Accreditation
- g. Withdraw GSTC Accreditation of the CB
- h. Ask the CB to investigate an allegation against a Certified Organization
- i. Ask the CB to revoke the certification of a Certified Organization

7.4.16. If the complaint investigation recommends issuing Non-conformities (NCs) against the CB, these NCs will be issued in accordance with the guidelines outlined in the GSTC Accreditation Manual. This action will occur subsequent to the closure of the complaint investigation.

7.4.17. If the complainant remains dissatisfied with the outcome of the GSTC complaint investigation, they have the option to escalate the complaint to the relevant governing body.

7.4.18. GSTC is responsible for proceeding with the investigation meticulously to avoid any discriminatory actions against the complainant.

7.5. General Requirements for Complaints

7.5.1. Complainants shall always disclose their identity to GSTC. In exceptional circumstances, GSTC will consider the Complainant's request to remain anonymous to the Parties to the complaint and shall protect their privacy and identity.

7.5.2. GSTC will endeavor to address any complaint that is brought to its attention promptly.

7.5.3. In extraordinary cases, GSTC can limit any timelines indicated in this procedure for a cumulative maximum of 30 working days. All Parties shall be informed accordingly.

7.5.4. All Parties involved in the process shall refrain from commenting publicly on the complaint until a decision is made and all parties have been informed accordingly.

7.5.5. GSTC will consider the Complainants' request for non-disclosure of the complaint.

8. Procedure for Concerns and Feedback

8.1. Formal concerns or feedback shall be submitted via the Grievance Form to accreditation@gstcouncil.org. GSTC manages questions regarding submitting the grievance form or submitted grievances.

8.2. GSTC will email an acknowledgment of receipt of the concern/feedback within 10 working days of receiving it.

8.3. Feedback regarding the GSTC Industry Criteria and the GSTC Destination Criteria shall be analyzed and grouped per theme for future consideration in the revision process of the GSTC Industry and/or Destination.

9. Procedure for Appeals

9.1. An appeal is a formal request submitted by a CB to GSTC for the reconsideration of an adverse accreditation decision and GSTC shall follow the described procedure.

9.2. Appellants shall submit a formal appeal within 30 days from the notification of the Accreditation Decision.

9.2.1. Appellants shall fill the [Grievance Submission Form](#) in its latest version.

9.2.2. Appellants shall include all documented evidence to support the appeal.

- 9.2.2.1. *Nature of the appeal.*
- 9.2.2.2. *A comprehensive explanation of the events and issues leading to the appeal.*
- 9.2.2.3. *Any correspondence relevant to the appeal.*
- 9.2.2.4. *Supporting evidence (e.g., emails, documents, photographs, etc.).*
- 9.2.2.5. *Indication of any prior attempts to address the issues, if applicable.*
- 9.2.2.6. *If a remedy is sought, a clear description of the desired outcome.*

9.2.3. All documents shall be prepared in English.

9.2.4. Appellants shall send the formal appeal via email to accreditation@gstc.org.

9.3. Appeal Procedure

9.3.1. GSTC will acknowledge the receipt of the appeal within ten (10) days.

9.3.2. GSTC will appoint an Appeal Committee responsible for receiving and deciding on the appeal by considering the impartiality principle.

9.3.3. GSTC will notify the Committee and forward the appeal and all supporting information within ten (10) days of acknowledging receipt of the appeal.

9.3.4. The Committee will assess the submitted information within 30 days of receiving it, determine whether to accept or reject the appeal, and inform GSTC.

9.3.4.1. The investigation may also involve interviews or other methods to gather evidence from the appellant and relevant parties, and the GSTC Secretariat may arrange a

virtual meeting upon request by the Committee or the appellant during the investigation for further discussion.

9.3.5. Appellants shall be informed about the decision from the GSTC. GSTC will notify the appellant of the Appeals Committee's decision within ten (10) days after the decision is made.

9.3.5.1. The committee's decision shall be considered as final.

9.3.5.2. If the appeal is rejected by the Committee GSTC, justification shall be given to the appellant.

9.3.5.3. If the appeal is accepted, GSTC shall give a one-to-one explanation to discuss the appeal and gain more understanding from the appellant.

9.3.6. GSTC will record all appeals and their outcomes for future reference and monitoring.

9.4. Throughout the appeal process, the nonconformity (NC) or accreditation decision under appeal will retain its validity unless adjustments are required as a consequence of the process.

9.5. If the outcomes of appeals result in modifications to the NC or the accreditation decision, GSTC will provide justification and communicate this information to the appellant, who is responsible for ensuring that the appeals do not impede the resolution of any remaining open NC, and must ensure that there is sufficient time to address and close the NC.

9.6. Appellants can withdraw their appeals by officially communicating their cancellation through email to accreditation@gstc.org.

9.7. The decisions regarding appeals will become the property of GSTC and will not be publicly accessible.

9.7.1. If the appellant wishes to share a redacted version of the GSTC report with other stakeholders, the appellant must seek approval from the GSTC.

10. Monitoring and Evaluation

- 10.1. All complaints, concerns, feedback, and appeals shall be analyzed for patterns and similar causes. GSTC will conduct this analysis annually.
- 10.2. Where patterns are identified, corrections to the corresponding GSTC Assurance Program shall be proposed and handled according to the level of risk to the system.

11. Record Keeping

- 11.1. All records generated from appeals, complaints, concerns, and feedback will be kept by GSTC for a maximum of 5 years, including:
 - a. Appeals, complaints, concerns, and feedback
 - b. Acknowledgements and notifications to the complainant
 - c. Confidentiality agreements signed by the complainant
 - d. Reports prepared during the evaluation, including proposed determination and corrective action or improvement plans.
 - e. Final decisions and outcomes of investigations
 - f. Annual summaries from the GSTC and certification bodies regarding complaints.

12. Expenses

- 12.1. GSTC maintains the right to bill costs and expenses to the parties submitting grievances and appeals for investigation at the GSTC Daily Rate.