Complaints Procedure

GWS talent transfer GmbH | International Nursing Recruitment India – Germany
As of: 08 October 2026

§ 1 Purpose and Scope

This Complaints Procedure governs the free, accessible, confidential and traceable receipt, handling and remediation of complaints in connection with the international recruitment and placement of Indian nursing professionals in Germany for which GWS is responsible. It applies to GWS and to activities involving business partners, recruitment partners, language schools, sub-agents and other third parties actually acting on behalf of GWS throughout the service chain. It supplements recruitment agreements, the General Terms and Conditions and the Policy Statement.

§ 2 Persons Entitled to Submit Complaints

Complaints may be submitted in particular by nursing professionals, applicants, former participants, family members, employees, whistleblowers and authorised trusted persons. Complaints may be submitted regardless of the stage of the application, recognition, visa or employment process. Anonymous reports will be examined insofar as the information available permits.

§ 3 Subject Matter of Complaints

Reportable matters include, in particular, unlawful recruitment fees (Candidate Fees), security deposits, deposits, contractual penalties, unlawful repayment demands, misrepresentation of working conditions, discrimination, pressure, threats, retention of passports or original documents, data protection violations, inadequate information, problems relating to recognition, language training, onboarding and integration, as well as violations of human rights and the quality and assessment requirements of the “Fair Recruitment Healthcare Germany” Quality Mark.

§ 4 Complaint Channels and Contact Details

Complaints may be submitted directly to GWS in Germany, without first contacting an Indian recruitment partner or employer. Available channels: by post to GWS talent transfer GmbH, Nordring 8a, 85417 Marzling, Germany; by email to the complaints address to be confirmed by Management before publication: beschwerde@gws-experts.com; by telephone at +49 151 61735220; or in person by appointment. Reports may be submitted in German or English; understandable language assistance will be arranged where needed. These channels are free of charge; necessary and reasonable communication assistance must not create a barrier to access.

§ 5 Independence, Confidentiality and Protection Against Retaliation

Complainants must not suffer disadvantages, retaliation, threats, contractual penalties or impairment of their placement as a result of submitting a complaint. Complaints are handled by a designated person who, wherever possible, was not involved in the matter complained of. In the event of a conflict of interest, another competent person or Management assumes responsibility. Information is processed strictly on a need-to-know basis and in compliance with the GDPR. Confidentiality is maintained to the extent permitted by law.

§ 6 Procedure and Time Limits

1. Receipt: Each report is registered with the date of receipt and a case number.
2. Acknowledgement: Generally within three working days, provided contact details are available.
3. Initial assessment: Responsibility, urgency, risk and any necessary immediate measures are assessed.
4. Fact-finding: Affected persons are heard; contracts, payment records and subcontractor evidence may be reviewed.
5. Decision and remedy: The outcome and next steps are communicated in an understandable manner.
6. Closure and follow-up: Implementation is documented. The aim is to complete the handling of a complaint within three weeks of receipt. If complexity makes this impossible, the complainant receives a reasoned interim response within that period and a new expected completion date.

§ 7 Immediate Measures and Remedies

In cases of acute danger, coercion, threats, retention of original documents or significant financial burdens, GWS promptly examines protective measures, suspends placement steps if necessary and informs competent authorities where required and permitted. Appropriate remedies may include returning documents, correcting inaccurate information, amending contracts, protection against retaliation, independent advice, restoration of rights or termination of cooperation with responsible partners.

§ 8 Employer Pays and Reimbursement

If a business partner engaged by GWS or another attributable member of the service chain charges fees or costs contrary to the prohibition on candidate payments which fall under the Employer-Pays Principle pursuant to the applicable quality and assessment requirements, GWS ensures that all corresponding payments demonstrably made by the nursing professional are reimbursed in full. Reimbursement must not depend on successful recovery from the partner. GWS documents the reason for payment, amount, evidence, reimbursement decision and actual receipt of the reimbursed funds. Further claims remain unaffected.

§ 9 Review of the Service Chain

GWS assesses human rights risks regularly and when circumstances warrant as part of its internal quality and process management; ILO due diligence tools may be used for this purpose. Business partners must be contractually required to pass on the applicable requirements to every subsequent member of the service chain and to provide information, cooperate and take remedial action. GWS may request general and event-driven audits, documents and evidence and may exercise contractual termination rights in the event of serious or repeated violations.

§ 10 Documentation, Data Protection and Retention

GWS maintains a protected complaints register recording case number, date, type of complaint, risk, responsible person, investigative measures, deadlines, decision, remedy, reimbursement and closure. Access rights are restricted. Retention and deletion are governed by a documented deletion policy, legal obligations and the principle of necessity; blanket indefinite storage is excluded. Evidence is made available for audits in compliance with data protection requirements.

§ 11 Review and Continuous Improvement

The complaints office evaluates cases, processing times, recurring causes, partner-related irregularities and the effectiveness of remedial measures at least quarterly. Management reviews this Procedure at least annually and whenever changes to the quality and assessment requirements, legal framework or service chain warrant a review. Findings are incorporated into risk assessments, contract design, training and partner management.

§ 12 External Advice and Other Rights

The internal procedure does not restrict access to independent advisory services, trade unions, authorities or courts, or any statutory complaint and legal remedy rights. On request, GWS provides information about suitable independent advisory services. A complaint may be withdrawn at any time unless statutory protection or investigation obligations prevent this.

§ 13 Entry into Force and Publication

This Procedure enters into force following written approval by Management. It is made available in understandable German and English, published on the website and made accessible before and during the recruitment process. Responsibilities, complaints email address and telephone number must be definitively entered before approval.

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