



THE REPUBLIC OF UGANDA  
MINISTRY OF GENDER,  
LABOUR & SOCIAL DEVELOPMENT

# NATIONAL GUIDELINES AND STANDARDS FOR COMPLAINTS MANAGEMENT IN SOCIAL PROTECTION PROGRAMMES

November 2024



# **National Guidelines and Standards for Complaints Management in Social Protection Programmes**

**September 2024**

## TABLE OF CONTENTS

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TABLE OF CONTENTS .....	i
LIST OF ABBREVIATIONS .....	iii
FORWARD .....	v
ACKNOWLEDGEMENTS .....	vi
DEFINITIONS .....	vii
1.0 BACKGROUND .....	1
1.1 Overview of Uganda's Social Protection System .....	1
1.2 Rationale for Guidelines and Standards in SP complaints Management .....	2
1.3 Objectives of the Guidelines .....	3
1.4 Targeted Users of the Guidelines .....	3
1.4 Diagnostics of Complaints Management in Social Protection Schemes .....	4
2.0 RELEVANT LEGAL AND POLICY FRAMEWORKS FOR SOCIAL PROTECTION .....	7
2.1 Legal Framework .....	7
3.0 NATURE OF COMPLAINTS IN SCHEMES .....	8
3.1 Categories of Complaints .....	8
3.2 Sources of Complaints and Grievances in Schemes .....	9
4.0 ESTABLISHING A PRINCIPLE-BASED COMPLAINTS MECHANISM: A GUIDE FOR SCHEMES .....	11
4.1 Accessibility .....	12
4.2 Openness and Transparency .....	13
4.3 Proportionality of actions and redress .....	14
4.4 Efficiency and effectiveness .....	15
5.0 THE COMPLAINTS MANAGEMENT MODEL .....	19
5.1 Intake .....	20
5.2 Acknowledgement .....	20
5.3 Assessment and investigation .....	20
5.4 Resolution .....	21
5.5 Communication of Decision .....	21
5.6 Follow up and Closure .....	21
6.0 INTEGRATION AND HARMONISATION WITH GOVERNMENT SYSTEMS .....	22
6.1 Management Information System (MIS) .....	22
6.2 Integration with the National Single Registry (NSR) .....	22
6.3 A Unified Approach .....	23
7.0 TOWARDS A UNIFIED SECRETARIAT FOR SOCIAL PROTECTION .....	24
7.1 Anchoring Scheme's Complaints in Government structures .....	24
7.2 Unified Approach at National Level .....	24
7.3 Unified Approach at Sub-National Level .....	25
7.4 Establish Strategic Partnerships with Government Bodies Mandated for .....	27

8.0	REFERRAL PATHWAYS AND BODIES MANDATED FOR COMPLAINTS MANAGEMENT .....	29
8.1	National Council for Older Persons (NCOP). ....	29
8.2	Equal Opportunities Commission (EOC). ....	29
8.3	The Uganda Human Rights Commission. ....	29
8.4	Inspectorate of Government (IG). ....	29
8.5	The Industrial Court and the Court for Alternative Dispute Resolutions. ....	30
8.6	The Magistrate's Court. ....	30
8.7	The Uganda Police. ....	30
8.8	The Local Council (LC) Court. ....	30
9.0	SCHEMES WITH OUTSOURCED/MULTIPLE ENTITY COMPLAINTS MECHANISMS.....	31
10.0	CONTINUOUS LEARNING AND IMPROVEMENT .....	33
11.0	MONITORING AND EVALUATION .....	34
12.0	ANNEXES .....	35
13.0	REFERENCES .....	36

## **LIST OF TABLES**

Table 1 : Actors and Mandates of Government Structures at the National Level	24
Table 2 : Actors and Mandates of Government Structures at the Sub-National Level	25

## **LIST OF BOXES**

Box 1 : SP Complaints Mechanism and Needs Assessment. ....	9
Box 2: Needs assessment for designing a Complaints Mechanism .....	11
Box 3: Considering a response to a complaint .....	21
Box 4 : Benefits of out-sourcing a complaints system for SP.....	31

## **LIST OF FIGURES**

Figure 1: Essential components effective implementation of a SP Scheme. ....	4
Figure 2: Steps in Complaints Management.....	19

## LIST OF ABBREVIATIONS

Abbreviation	Definition
C&G	Complaints and Grievances
CAO	Chief Administrative Officer
CDO	Community Development Officer
CEDAW	Convention on Elimination of all forms of Discrimination Against Women
CSO	Civil Society Organisation
DCDO	District Community Development Officer
DRDIP	Development Response to Displacement Impacts Project
EOC	Equal Opportunities Commission
ESP	Expanding Social Protection
ESSS	Environmental and Social Safeguard Standards
GBV	Gender-Based Violence
GOU	Government of Uganda
IG	Inspectorate of Government
ILO	International Labour Organisation
KPIs	Key Performance Indicators
LC	Local Council
M&E	Monitoring and Evaluation
MGLSD	Ministry of Gender, Labour and Social Development
MIS	Management Information System
MoPS	Ministry of Public Service
MoU	Memorandum of Understanding
NCOP	National Council for Older Persons
NGO	Non-Governmental Organisation
NIRA	National Identification and Registration Authority
NSPP	National Social Protection Policy
NSR	National Single Registry
NSSF	National Social Security Fund
NUSAF	Northern Uganda Social Action Fund
PS	Permanent Secretary
PSPS	Public Service Pension Scheme
PWD	Persons With Disability
RTSU	Regional Technical Support Unit
SAGE	Social Assistance Grants for Empowerment
SCG	Senior Citizens Grant
SLA	Service Level Agreement
SP	Social Protection

TWG	Technical Working Group
UBRA	Uganda Benefits and Retirement Authority
UHRC	Uganda Human Rights Commission
WFP	World Food Programme

## FOREWORD

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Complaints Management is a function of management that plays a vital role in the effective implementation of Social Protection Programmes and responsive service delivery. In collaboration with the World Food Programme (WFP), the Ministry of Gender, Labour and Social Development (MGLSD) has developed *The National Guidelines and Standards* to establish minimum principles and standards for Social Protection Schemes when establishing or implementing their complaint mechanisms.

Globally, there is widespread recognition within the Social Protection sector that a robust complaints mechanism is essential for the smooth execution of any programme. Without it, beneficiaries and the public may lose trust in the programme's performance and accountability, particularly regarding how complaints are addressed. This lack of trust can lead to overall dissatisfaction and is detrimental to both accountability and effective service delivery.

These guidelines align with the National Social Protection Policy, 2015, which emphasises the importance of a strong complaints system for delivering Pillar II of the Social Protection Strategy. This pillar focuses on providing care, support, protection, and empowerment to women, persons with disabilities, the elderly, and other vulnerable individuals who may struggle to engage effectively in social support programmes.

Each social protection programme is responsible for establishing a comprehensive complaints system that enables beneficiaries and interested parties to easily lodge complaints and have their concerns resolved swiftly. This initiative requires programmes to commit to the continuous improvement of their complaint's mechanism, optimising their use to enhance service delivery.

While these guidelines are not intended to serve as rigid blueprints, the MGLSD encourages entities to apply the principles outlined herein to invest in creating clear, consistent, and functional mechanisms for managing complaints. Additionally, the MGLSD will utilise these guidelines to fulfil its oversight and coordination functions across various schemes.



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## ACKNOWLEDGEMENT

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The Ministry of Gender, Labour and Social Development (MGLSD), in partnership with the World Food Programme (WFP), is proud to present *The National Guidelines and Standards for Complaints Management in Social Protection Programmes*. These guidelines aim to establish essential standards and principles for the effective design and implementation of complaint management systems.

This initiative stems from recommendations made in the 2023 joint review of the complaints and grievance management systems for two direct income support programmes: The Development Response to Displacement Impacts Project (DRDIP) and the Senior Citizens Grant (SCG). The findings underscore the principles articulated in the National Social Protection Policy, emphasising the critical need for a robust system to effectively deliver Pillar II (social care and support services) of the social protection strategy. This pillar is dedicated to providing care, support, protection, and empowerment to women, persons with disabilities, the elderly, and other vulnerable groups who may face challenges in engaging with social protection schemes.

We extend our heartfelt gratitude to the WFP for its generous funding and unwavering support, which made this initiative possible. We are particularly thankful to the Technical Working Group (TWG) for their collaborative efforts in supporting the consultant responsible for developing these guidelines. Special recognition is also due to lead consultant Pius Ongom Okello for his invaluable guidance throughout this process.

The leadership of the Expanding Social Protection Programme and the TWG provided crucial insights, critiques, and guidance that were instrumental in shaping these guidelines. While we cannot name every contributor, we would like to specifically acknowledge Prosper Muhumuza, Commissioner for Elderly and Disability; Paul Onapa, Deputy Head of the ESP Programme Management Unit; Sam Acodu, SAGE Operations Coordinator; Simon Ogaya, Seniors Programme Officer Operations; Jimmy Hilton OPIO, Senior Programme Officer Complaints & Grievances Management; and all RTSU staff for their significant contributions.

We also appreciate the support and input from various organisations, Ministries, Departments, and Agencies, including the Office of the Prime Minister, the National Social Security Fund, the Ministry of Public Service, and the Uganda Retirement Benefits Authority.

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## DEFINITIONS

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<b>Appeals</b>	Complaints about the accuracy or fairness of decisions made by Social Security Agencies ( <i>World Bank 2019</i> ).
<b>Complaints</b>	Concerns or dissatisfaction with the manner or quality of services provided by Social Security Agencies ( <i>World Bank, 2019</i> ). In social protection, they relate to issues in programme administration, such as targeting or payments ( <i>Implementation Guidelines for the Senior Citizens Grant, June 2019</i> )
<b>Complaints Mechanism</b>	Tool for collecting information and feedback from beneficiaries to detect and remedy malfunctions, inefficiencies or violations of rights and obligations in the delivery of SP services. ( <i>ILO Social Protection Spotlight, 2012</i> )
<b>Social Protection:</b>	The National Social Protection Policy of Uganda (NSPP, 2005) defines Social Protection as public and private interventions to address risks and vulnerabilities that expose individuals to income insecurity and social deprivation, leading to undignified lives.

## 1.0 BACKGROUND

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### 1.1 Overview of Uganda's Social Protection System

The Government of Uganda (GoU) recognises social protection (SP) as essential for achieving national development goals. Social protection is critical in ensuring social security for vulnerable populations affected by age, social class, location, disability, gender, disaster, or lack of income.

To ensure comprehensive delivery of SP programmes, the Ministry of Gender, Labour and Social Development (MGLSD) is mandated to provide overall policy direction and coordination for all social protection programmes in Uganda. MGLSD envisions a comprehensive SP system encompassing all frameworks, activities, programmes, services, institutional arrangements, and long-term goals for SP.

In fulfilling this mandate, MGLSD is guided by the National Social Protection Policy (NSPP, 2015), which aims to address the fragmentation in SP delivery by harmonising and improving the coordination of various social protection interventions.

The NSPP organises SP around two pillars:

#### i) **Social Security (Contributory schemes and income support programmes)**

- **National Social Security Fund (NSSF):** Mandatory savings for formal workers, providing retirement income.
- **Public Service Pension Scheme (PSPS):** Benefit for government employees.
- **Uganda Retirement Benefits Regulatory Authority (URBRA):** Public and private schemes for retirement benefits.

#### ii) **Social Care and Support (Non-contributory programmes for vulnerable populations)**

- **Northern Uganda Social Action Fund (NUSAF):** Income support and resilience-building through temporary public works in 66 districts.
- **Social Assistance Grants for Empowerment (SAGE):** Cash grants to reduce poverty among vulnerable populations. Includes the Senior Citizen Grant (SCG), which disburses a monthly cash grant of UGX 25,000 to older persons.
- **Development Response to Displacement Impacts Project (DRDIP):** Targets refugees and host communities in 15 districts to improve social services, economic opportunities, and environmental management.

A key priority in the NSPP is strengthening institutional capacity to deliver SP services, including complaints management. A robust and transparent complaints management system promotes effective delivery of SP services, yet this is an often-neglected function in the management of SP services.

A recent study<sup>1</sup> on the Development Response to Displacement Impacts Project (DRDIP) and the Social Cash Grant (SCG) programmes, for instance, found that there is currently no uniform mechanism across SP programmes in Uganda. Among its recommendations was the development of national guidelines for complaints management to harmonise the implementation of critical programme services offered to the various SP constituents.

## 1.2 Rationale for Guidelines and Standards in SP complaints Management

*National Guidelines and Standards for Complaints Management in Social Protection programmes* (hereafter, ***The Guidelines***) are essential for achieving the SP agenda, as highlighted in the Uganda Social Protection Sub-Sector Review (2019). The NSPP clearly articulates the mandate of MGLSD over setting standards and guidelines to promote transparency and accountability in the delivery of various social protection programmes (hereafter, ***Schemes***), strengthen the participation and inclusivity of stakeholders, and harmonise delivery systems of implementing organisations (hereafter, ***entities***)

Complaints systems play a critical role in supporting key programme functions such as targeting, enrolment, financial management, payment, and communication. A robust complaints system also enables SP programmes to stay connected with their beneficiaries, providing valuable feedback to detect inefficiencies, malfunctions, or rights violations, as emphasised by the ILO Social Protection Spotlight (2012).

*The Guidelines* are intended to serve as a foundational tool for ensuring consistency and efficiency across SP programmes, aligning with the NSPP's vision. They will help SP programmes develop tailored systems while strengthening the MGLSD's coordination role. Thus, the development of *The Guidelines* will promote standards of good practice and strengthen C&G systems across SP programmes, ensuring they are effective, transparent, and responsive to the needs of beneficiaries.

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<sup>1</sup> 2022 Review of the complaints management system for SAGE and DRDIP

*The Guidelines* were developed in consultation with key SP stakeholders and also through incorporating best practices from other sectors that have developed similar documents locally and internationally.

### 1.3 Objectives of the Guidelines

The NSPP policy provides that the MGLSD is responsible for setting standards and guidelines on delivery of various social protection services while recognising the unique challenges faced by SP programmes especially resource constraints. *The Guidelines* are therefore intended to promote standards of best practice by entities for the implementation of an effective complaint's mechanism.

The development of *The Guidelines* will specifically enable the MGLSD, as the Government authority responsible for social protection in Uganda, fulfil its mandate by:

- i) **Providing minimum standards:** to guide SP programmes in setting up functional, effective and efficient complaints management mechanisms.
- ii) **Harmonising delivery systems:** given that several entities are implementing various SP interventions that vary in scope, size, and complexity. Notably, these interventions are delivered through the same government structures. *The Guidelines* aim to harmonise the operations of SP interventions with government structures and to enhance coordination.

### 1.4 Targeted Users of the Guidelines

*The Guidelines* will be used by all government and non-governmental entities providing SP services to citizens and other beneficiaries. These entities include:

1. **Ministry of Gender, Labour, and Social Development.** *The Guidelines* are intended to support the Ministry in the delivery of its mandate of coordinating, monitoring, and regulating the delivery of social protection services in Uganda.
2. **Government Agencies.** *The Guidelines* are intended to support entities with specific mandates in social security or social protection to implement efficient and effective complaints mechanisms. These institutions include; National Social Security Fund (NSSF), Ministry of Public Service (MoPS), and Uganda Retirement Benefits Authority (UBRA), among others.
3. **Government Authorities:** All levels of local government involved in the delivery of social protection and security services, i.e., District Local Governments, Cities and Municipalities.

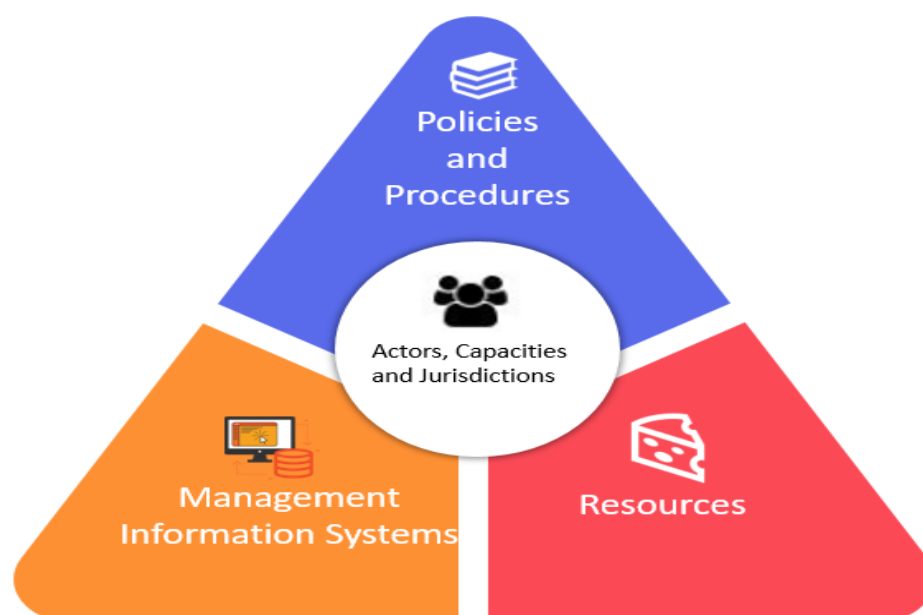
4. **Civil Society Organisations (CSOs) and Non-Governmental Organisations (NGOs)** that are involved in implementing or are intending to establish complaints mechanisms for their schemes.
5. **Private Organisations:** These Includes all private entities/companies partnering or sub-contracted to provide direct and indirect support to entities responsible for implementing schemes.

Note that while *The Guidelines* have been developed to support the MGLSD in fulfilling its mandate, they serve not as a “one-size-fits-all” framework but only as minimum standards that schemes and entities can customise in designing their C&G systems.

### 1.4 Diagnostics of Complaints Management in Social Protection Schemes

The diagnosis of the complaints management systems in Social Protection (SP) schemes will be based on the conceptual framework outlined in the SAGE/DRDIP Complaints Review (2024). This review emphasizes that achieving effectiveness and efficiency in social protection requires collaboration with relevant stakeholders and enhancing their capacities to fulfil their mandates. Additionally, aspects such as Management Information Systems (MIS), resources, policies, and procedures serve as enablers that allow the scheme to operate effectively. Ultimately, an efficient complaints management system acts as a critical facilitator for the successful implementation of these schemes.

**Figure 1: Essential components effective implementation of a SP Scheme.**



*Source: SAGE /DRDIP complaints review Report (2024)*

Most Social Protection schemes in Uganda have designed their own complaints management system based on the nature of their interventions, experiences and needs of the users. While some have worked well, there have been shortcomings in others either on how complaints have been handled or the misunderstanding. There is unanimity among SP Programmes that having a complaints mechanism that is trusted by complainants is vital for the effective implementation of schemes.

At a strategic level, the importance of complaints management in schemes is often undervalued, leading to insufficient prioritisation and resource allocation. This has resulted in several structural weaknesses that have undermined their effective implementation of their complaints mechanism.

The most common weakness pertains to having weak complaints guidelines or protocols. Many schemes lack robust guidelines, leaving procedures unclear. Staff often focus on broad public awareness instead of effectively managing individual complaints. Some of the complaint's guidelines do not have well-articulated standard operating procedures for the various complaints received in the schemes. For example, the public service pension scheme has yet to develop specific complaint guidelines.

Some schemes have significant levels of undocumented complaints in various schemes, undermining stakeholder confidence and fostering a culture of silence around unresolved issues. This problem stems partly from weaknesses in the guidelines but is also exacerbated by capacity challenges within the entities responsible for managing complaints. In interviews with the Ministry of Public Service, officials noted that these weaknesses are influenced not only by capacity issues but also by staff attitudes towards handling complaints.

Another significant flaw in some complaints management systems is the lengthy resolution process. Findings from the SCG/DRDIP complaints review report (2024) indicate that many complainants experienced excessive delays, often exceeding a month, with some issues remaining unresolved for over a year. This inefficiency was mainly attributed to reliance on paper-based systems. However, Interviews with NSSF and UBRA revealed that delays can also occur when resolution falls outside the scheme's remit, particularly when it involves third parties, such as the courts.

Moreover, stakeholders in some schemes have expressed concerns about limited access to reporting channels. Most schemes offer few active reporting options, restricting beneficiaries'

ability to lodge complaints and diminishing overall responsiveness. This challenge is largely due to resource constraints that limit the schemes' ability to develop multiple channels. Nevertheless, there was a consensus among all social protection stakeholders interviewed that every scheme must invest in raising public awareness about their complaints mechanisms to enhance engagement and uptake by the stakeholders.

The Silo Implementation complaints management in SP schemes that involve operating in isolation is also a very common phenomenon in Uganda. Complaints management systems in these schemes such as the SCG, NUSAF and PSPS often operate in isolation, missing opportunities for collaboration and synergy among similar governmental structures that often complain of work overload. In addition, the opportunity to optimise the use of resources among schemes and to leverage digital technology in complaints management has not been sufficiently exploited.

Therefore, the development of *The Guidelines* is essential for addressing these weaknesses and improving the effectiveness of complaints management in Uganda's social protection schemes.

## 2.0 RELEVANT LEGAL AND POLICY FRAMEWORKS FOR SOCIAL PROTECTION

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There are a number of global and national legal and policy instruments that support the development of effective complaints management systems for social protection schemes. Schemes should identify relevant provisions within these frameworks that not only justify the creation of their complaints mechanisms but also guide their management practices. It is essential for schemes to consider specific legal and policy instruments to ensure the compliance of the complaint handling process. Below are some key instruments to consider.

### 2.1 Legal Framework

#### 2.1.1 International Legal Instruments

These include:

- i. Convention on Elimination of all forms of Discrimination Against Women (CEDAW), 1979.
- ii. Convention on the Rights of Persons with Disabilities, 2006.
- iii. The United Nations Convention on the Rights of a Child, 1990.
- iv. International Covenant on Economic, Social and Cultural Rights, 1976.
- v. The World Bank's International Environmental and Social Safeguard Standards (ESSS).

#### 2.1.2 National Legal Instruments for Social Protection and Protection of Human Rights

- i. The Constitution of Uganda, 1995.
- ii. The National Social Security Fund Act Cap.230.
- iii. The Employment Act Cap. 225.
- iv. The Workers Compensation Act Cap.233.
- v. The Equal Opportunities Commission Act Cap.7.
- vi. The Public Finance Management Act, 2015;
- vii. The Whistle-blowers Protection Act Cap. 171.
- viii. The Personal Data Protection and Privacy Act Cap. 97.
- ix. The Uganda Retirement Benefits Regulatory Authority Act Cap. 232.
- x. The National Council for Older Persons Act Cap 112.
- xi. The Labour Disputes (Arbitration and Settlement) Act Cap. 227.

#### 2.1.3 National Policy Instruments

- i. The National Social Protection Policy, 2015.
- ii. The National Policy for Older Persons, 2009.
- iii. The National Equal Opportunities Policy, 2006.
- iv. The National Child Policy, 2020.



- v. The National Disability Policy, 2006.
- vi. The National Gender Policy, 2007.

### 3.0 NATURE OF COMPLAINTS IN SCHEMES

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#### 3.1 Categories of Complaints

There are usually five categories of complaints in social protection programmes that include:

**(i) Programme Services Complaints.**

This is when an individual (usually a beneficiary in a scheme) expresses dissatisfaction with the scheme's implementation arising from a duty-bearer's actions, inactions, or omissions that affect access to the entitled services or dissatisfaction with the timeliness and or quality of services. For example, delayed on-boarding, unfair targeting criteria, and inaccessible service points, among others.

**(ii) Complaints about Contractor's service.**

This is when an individual expresses dissatisfaction with the services of a scheme's sub-contractor/service provider arising from either delay in the delivery of a contracted service or a service is not delivered to expectation as agreed with the scheme. For example, delayed delivery of entitlements, delayed resolution of complaints lodged, and inaccessibility of service points, among others.

**(iii) Grievances.**

These are complaints that arise when a beneficiary feels his/her rights have been violated due to a serious misconduct or misconducts by a duty bearer such as fraud, mistreatment, corruption, extortion or abuse by programme staff or service provider. Grievances, which often include complaints and appeals, typically involve allegations that may be substantiated only following a formal process. Examples of grievances are charging illegal fees for services, sexual abuse, physical abuse, and injury.

**(iv) Other Complaints.**

Complaint systems can be overwhelmed with non-SP related or minor issues that are easily resolved on the spot by providing information to the complainant. Schemes can forestall such by raising public awareness about programme entitlements, processes, and eligibility requirements.

**(v) Appeals.**

These arise where a beneficiary is dissatisfied with the correctness or fairness of decisions of a scheme, typically following a prior complaint about a service or benefit, or how it was resolved.

### **3.2 Sources of Complaints and Grievances in Schemes**

Complaints and grievances in schemes usually arise throughout the whole cycle of the programme implementation. While some can be anticipated at the design stage, others emerge in the course of implementing the programmes. For those that are anticipated, schemes should identify and map out all the different types of complaints and grievances in each phase of implementation and their causes for effective management. To achieve this, schemes will have to conduct a comprehensive needs assessment

#### **Box 1 : SP Complaints Mechanism and Needs Assessment.**

Before establishing a complaints mechanism, schemes should conduct a thorough needs assessment to identify potential complaints and challenges, including accessibility barriers, sociocultural factors, and technological limitations. Engaging with stakeholders such as beneficiaries and local governments is essential to understand their specific needs and expectations for the complaint's mechanism.

The phases and causes of the complaints and grievances are summarised below.

**i. Targeting Phase.**

This involves selecting beneficiaries through mass registration or using data from social registries like NIRA. Complaints at this phase often arise from poor communication, data errors, unclear/misunderstood targeting criteria, long distances to registration points, a duty bearer's absence or inability to speak the local language, etc. Most complaints and grievances at this stage can be resolved by providing the information required.

**ii. Assessment Phase.**

After obtaining the necessary data, schemes apply eligibility criteria to assess each individual/household. Complaints and grievances at this stage arise from misunderstanding the assessment results, unexpected outcomes, errors in automated targeting systems, or concerns about the implementation process. To prevent future complaints during enrolment, schemes should clearly communicate the results to all assessed individuals.

iii. **Enrolment and On-boarding Phase.**

Eligible individuals are enrolled in the programme and guided through the procedures required to access benefits. At this stage, complaints may arise about eligibility (inclusion/exclusion errors), delays in feedback/results from the assessment phase, misunderstandings/disputes over entitlement calculations, complex on-boarding processes, or missed enrolment opportunities due to a lack of information about the schedule.

iv. **Benefits Delivery Phase.**

After enrolment, schemes begin delivering benefits, such as cash transfers or in-kind support. Complaints at this stage often involve issues like timeliness, quality, quantity and accessibility of benefits. These may stem from factors like long distances to service delivery points, missed or delayed payments, payment errors, and discrepancies between expected and received entitlements. If a contracted payment service provider handles payments, additional complaints may include payment token or authentication failures, service delays, or lack of services.

v. **Beneficiary Management Phase.**

Once beneficiaries receive their first entitlement, the focus shifts to managing data changes that may affect their eligibility or satisfaction with the programme. Complaints at this stage may arise from delays in updating beneficiary data, errors in compliance data leading to penalties or benefit suspension, or service delays/cancellations due to administrative errors. There may also be grievances over unethical staff behaviour (e.g., misconduct, nepotism, discrimination, fraud, or corruption), lack of a complaint's mechanism, or appeals challenging decisions on eligibility or entitlements.

## 4.0 ESTABLISHING A PRINCIPLE-BASED COMPLAINTS MECHANISM: A GUIDE FOR SCHEMES

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Complaints are a valuable source of information for entities and schemes about how and where mistakes or weaknesses are occurring in the any programme. While many SP schemes may have a complaint handling policy or procedure, some often fail to integrate the essential components of an effective complaint management system, leading to lost opportunities for improvement and continued stakeholder satisfaction. Therefore, establishing a suitable complaints system is essential for effective implementation of social protection schemes.

A complaints mechanism for any scheme should be built on guiding principles that address unique challenges stakeholders may face. Understanding these challenges and needs requires conducting a thorough needs assessment. Schemes should consider factors such as programme scale, target population, geographical coverage, and resource availability when customising the complaints mechanism to meet their specific needs.

### **Box 2: Needs assessment for designing a Complaints Mechanism**

The first step in designing an effective complaints mechanism is conducting a thorough needs assessment to identify potential user-related challenges, such as accessibility barriers, sociocultural factors, and technological limitations. In order to ensure that the mechanism is responsive to actual stakeholder needs, scheme managers should conduct consultations at all levels (including beneficiaries, implementing partners, caregivers, government authorities, service providers and others) to understand their expectations and specific requirements.

To support MGLSD's mandate of ensuring that schemes establish effective and responsive complaints mechanisms, four guiding principles have been identified: Accessibility, Openness and Transparency, Proportionality of Action, and Efficiency and Effectiveness. While no scheme can fulfil all the expectations of complainants, integrating these principles into the process will enhance satisfaction with the resolutions provided. Therefore, MGLSD recommends that schemes integrate these principles when developing or implementing their complaints systems.

Below are the expectations for integrating the key principles into the complaint's mechanisms of schemes.

## **4.1 Accessibility**

The complaints mechanism must be accessible to all beneficiaries, particularly vulnerable populations such as women, youth, older persons, and PWDs without fear of retaliation or discrimination. The following considerations should be made by schemes to enhance accessibility of their complaint's mechanisms:

### **4.2.1 Awareness Creation.**

Schemes should ensure stakeholders are informed about the availability of complaints services, emphasising that they are accessible to everyone without discrimination and free of charge. Targeted public awareness campaigns should promote the complaints mechanism through various communication channels accessible to beneficiaries, such as radio, social media, brochures, leaflets, and community notice boards. Additionally, providing displays and information packets with clear instructions and educational materials will help stakeholders understand the complaint process and available channels. Communication strategies should respect local cultural norms while encouraging the use of the complaints system.

### **4.2.2 Service Accessibility.**

Schemes must facilitate easy access for anyone wishing to lodge a complaint. This includes having guidelines and standard operating procedures (SoPs) for various complaints and activating multiple reporting channels. Understanding the profiles of stakeholders, particularly vulnerable individuals, is crucial to ensuring that various appropriate channels are available for reporting grievances. A robust complaints mechanism should offer diverse submission options, such as complaint boxes, telephone, SMS, email, complaint forms, and in-person face-to-face interactions at local offices. Additionally, channels should be accessible to both beneficiaries and their caregivers or representatives. Regular assessments of accessibility should be conducted through satisfaction surveys.

### **4.2.3 Inclusivity.**

Schemes should identify potential barriers that limit access to complaints mechanisms and implement measures to address them. Channels and procedures for receiving complaints should consider cultural barriers, such as stigmatisation or fear of reprisal. Special attention should be given to accessibility for vulnerable individuals, those who are illiterate or face language barriers, and persons with disabilities. It is essential to

build the capacity of staff to effectively handle diversity and ensure inclusivity within the complaints system.

## **4.2 Openness and Transparency.**

Openness and transparency in complaints mechanism is fundamental in demonstrating accountability and fairness. Every scheme should implement a complaints mechanism that is open and transparent even if this sometimes exposes them to reputational risks. Doing this will require that every decision made should be communicated clearly to the complainants with exception of those that preferred to be anonymous. Schemes should establish mechanisms for tracking and reporting the outcomes of complaints. In order to promote the principle of openness and transparency schemes should:

### **4.2.1 Empower duty bearers in the Complaints mechanism.**

Complaints mechanisms must operate independently of all interested parties to guarantee fair, objective, and impartial treatment of each case. The mechanism should ideally be independent of the entities administering the benefits to ensure impartiality. Schemes should ensure that duty bearers perform their required duties in the complaint's mechanism without fear or favour. They should be provided with adequate resources to perform and achieve their targets. The roles of the various duty bearers should be clearly outlined in their terms of reference to perform their duties.

### **4.2.2 Maintain open communication.**

Schemes should strive to maintain open communication about all the cases being investigated with exception of those need to be confidential. In order to manage expectations, it's important that schemes publicise the standard procedures for investigating complaints, what is possible and not possible to achieve. Additionally, schemes should publicise the circumstances for appealing and the process in case complainants wish to challenges some of the decisions made.

### **4.2.3 Ensure functionality of structures identified to support complaints mechanism**

The complaints guidelines of some schemes may identify or foresee the establishment of some structures to support the complaints mechanism, for example appeals committees. Schemes should ensure that these structures are in place and operational before rolling out the complaint's mechanism. All structures should have clear mandates that should be known to all stakeholders.

#### 4.2.4 Strengthen stakeholder management.

Some schemes involve delivering components either through sub-contractors or working with other partners. Depending on the entities involved, schemes should maintain healthy relationships since some complaints emerge from their interactions with the target stakeholders. This can be done for example through establishing a forum where stakeholders provide feedback on complaints lessons learnt and agree on next steps. Schemes can use such a forum to emphasise the aspiration to be achieved through the implementation of an effective complaint's mechanism.

#### 4.2.5 Establish privacy and data protection protocols for complaints.

Schemes should establish and implement complaints and grievance handling protocols that protect the privacy of the complainant. This requires that only those managing the complaints mechanism or are authorised should have access to any related data. Schemes **should offer a platform for anonymity and whistle-blowing in complaints reporting.**

Many complainants may prefer to remain anonymous for various reasons, yet their information can be vital. Additionally, some individuals may need protection when disclosing sensitive information as whistle-blowers. Therefore, schemes should implement policies and establish platforms that allow for anonymous complaints, ensuring safety and confidentiality. Promoting a secure environment for reporting can encourage more individuals to come forward and complaint thus providing valuable insights to schemes about what is happening.

#### 4.3 Proportionality of actions and redress.

Usually schemes are faced with resource constraints for various priorities and the complaints mechanism is not an exception. Scheme should therefore make informed choices about what process they wish to apply for a particular complaint while cognisant of the resource constraints. If the complaint is minor, the resolution process should be straight forward but if its complex then a clear process should be outlined for resolution.

The principle of proportionality implies that schemes will assess every complaint and consider appropriate response based on the nature and resources available. In order to promote the principle of proportionality schemes should.

- a) **Consider internal resolution, especially at the lowest level.** Satisfaction with the complaint's mechanism will be achieved if complaints can be resolved promptly,

saving resources. Schemes should strive to put in place complaints procedures requiring complainants to exhaust internal complaint resolution avenues before seeking external intervention. If the internal resolution avenues are robust, then schemes will be able to limit the number of appeals to other complaints management institutions. Every procedure used for resolving a complaint should be appropriate to the nature and impact it may have in the scheme.

b) **Resolutions should be appropriate to the complaint.** Schemes should ensure that all the resolutions reached are realistic and within their remit. The complainant should be informed of what to expect in terms of resolutions to their complaint. The following options for resolution of complaints should be considered:

- i. **Maintaining the decision:** Sometimes schemes may have to do nothing about the complaint especially if it's not valid. There should be a mechanism in place to communicate this feedback and the basis on which the decision was made.
- ii. **Reversing decision or remedial action:** This means schemes can change decisions or standpoints that were previously taken. This may involve reinstatement of the benefits or reversal of any penalty that could have been imposed on the complainant.
- iii. **Correcting administrative errors:** If a complaint arose from errors in the administration of a given process in the scheme, then the necessary corrections should be made to avoid future occurrence of the same. There is need to review the implications of any changes on scheme, especially for other similar cases to determine if the proposed actions are proper.
- iv. **Offering an apology:** Some complaints can be resolved simply by apologising to the complainant on behalf of the scheme.

It should be noted that in resolving complaints, schemes may utilise any of the options above or in combination with others that may not have need been articulated.

#### **4.4 Efficiency and effectiveness.**

Schemes should address structural issues in their operations to reduce the incidences of complaints. In this case, schemes be effective in what they do and efficient in how they do it. Efficiency influences complainants' perception of how well their complaints have been handled. The quality of investigation and its outcome, and the timeliness of the resolutions



influence how complainants view the scheme. Schemes should consider the following to promote efficiency and effectiveness in their complaints and grievance mechanisms:

a) **Timely resolution of complaints is critical.**

The complaints mechanism should address and respond to concerns raised by the stakeholders promptly as per the minimum standards set. A client service charter should be developed and publicized for each scheme, outlining the expected timelines for every step in the complaint resolution process. Ensuring that complaints are resolved promptly avoids prolonged uncertainty and hardship for the complainants.

b) **Prioritise the quality of the complaints process to achieve the desired outcome.**

Implement a complaints mechanism that focuses on both the process and outcome (See Section 6, Complaints Management Model). The management of schemes should promote a culture that values complaints and their effective resolution. Schemes should ensure that complainants feel heard, respected, and taken seriously. Lastly, Complainants should receive necessary support and be informed about the process, progress, and outcome.

c) **Establish clear and robust communication strategy for complaints management.**

The complaints mechanism should focus on raising awareness about the process, duty bearers involved, the standard resolution timelines for the various cases and limitations. This communication approach is especially important for managing expectations and ensuring that complainants feel that their issues have been handled fairly, even in difficult situations. It's recommended that information on the complaint's mechanism should be widely published. In addition, schemes within their remit should establish feedback mechanisms to the various constituents that include complainants and others stakeholders. This approach enhances satisfaction with the system and contributes to effective resolution.

d) **Ensure consistency in approach.**

Promote the norm of handling every complaint in their own merit. However, in doing this, they should ensure that there is consistency in handling and resolving cases that are of a similar nature. Schemes should make a careful consideration of past decisions on similar cases when handling complaints and not just treat them as binding especially if the case may merit a different outcome.

e) **Provide the option to review the outcome of a complaint or to lodge an appeal.**

Every scheme should provide clear pathways to allow complainants to request a review of a complaint outcome or to file an appeal if they are dissatisfied. Depending on the size and complexity of the scheme, they can consider establishing within their remit a review or appeals procedure anchored on its internal governance structure or provide for the establishment of a completely independent structure.

- f) **Provide for adequate resources to implement the complaints mechanism.** For the complaints mechanism to be effective, schemes should provide appropriate resources for reporting, investigating and resolving complaints. Schemes should ensure that the minimum financial, and technical resources required to sustain complaints processes are prioritized in the planning and budgeting processes at all levels of implementation. The appropriateness and reasonableness of the resources should be determined by each scheme although in standard practice most M&E functions are appropriated between 2-5% of the overall budget.

- g) **The complaints mechanism should be continuously improved.** Schemes should have the capacity to learn from their own complaints and grievances process and incorporate feedback to enhance future practices and prevent similar issues from arising. The mechanism should monitor and analyse data regularly, using feedback to continuously improve both the effectiveness of the programme and the complaints mechanism itself. In order to achieve this objective, schemes should strengthen their management information systems (MIS) so that they can produce the requisite reports capable of facilitating decision on what improvements should be considered. (See Section 7.1, Management Information System). Secondly, schemes should regularly conduct client satisfaction surveys and benchmark with other schemes to incorporate best practices identified.

- h) **Establish a dedicated complaints unit and recruit competent staff to implement the complaints mechanism.** Schemes should endeavour to establish a dedicated unit for complaints management and recruit staff that will be capable of discharging the various functions effectively. For example, assign dedicated staff at various levels of implementation at the national, district, city/municipal, sub-county/division, and parish/ward levels to handle C&Gs. Ideally, complaints management staff should not be involved in service delivery.

Secondly, the staff employed should have the right qualifications, competencies and skills. On the number of staff, while the ideal situation is to have dedicated staff for C&G, this is sometimes not feasible, hence schemes may address staffing gaps by integrating complaints management responsibilities into existing roles within their structures. Partners and sub-contractors should be required to employ or integrate complaints management in their operations.

In addition, schemes should invest in continuous capacity building to enhance the skills of staff to improve on their performance of the complaints function. Schemes can contact the MGLSD for resource persons to train in complaints management.

i) **Conduct regular audit of the complaint's mechanism.**

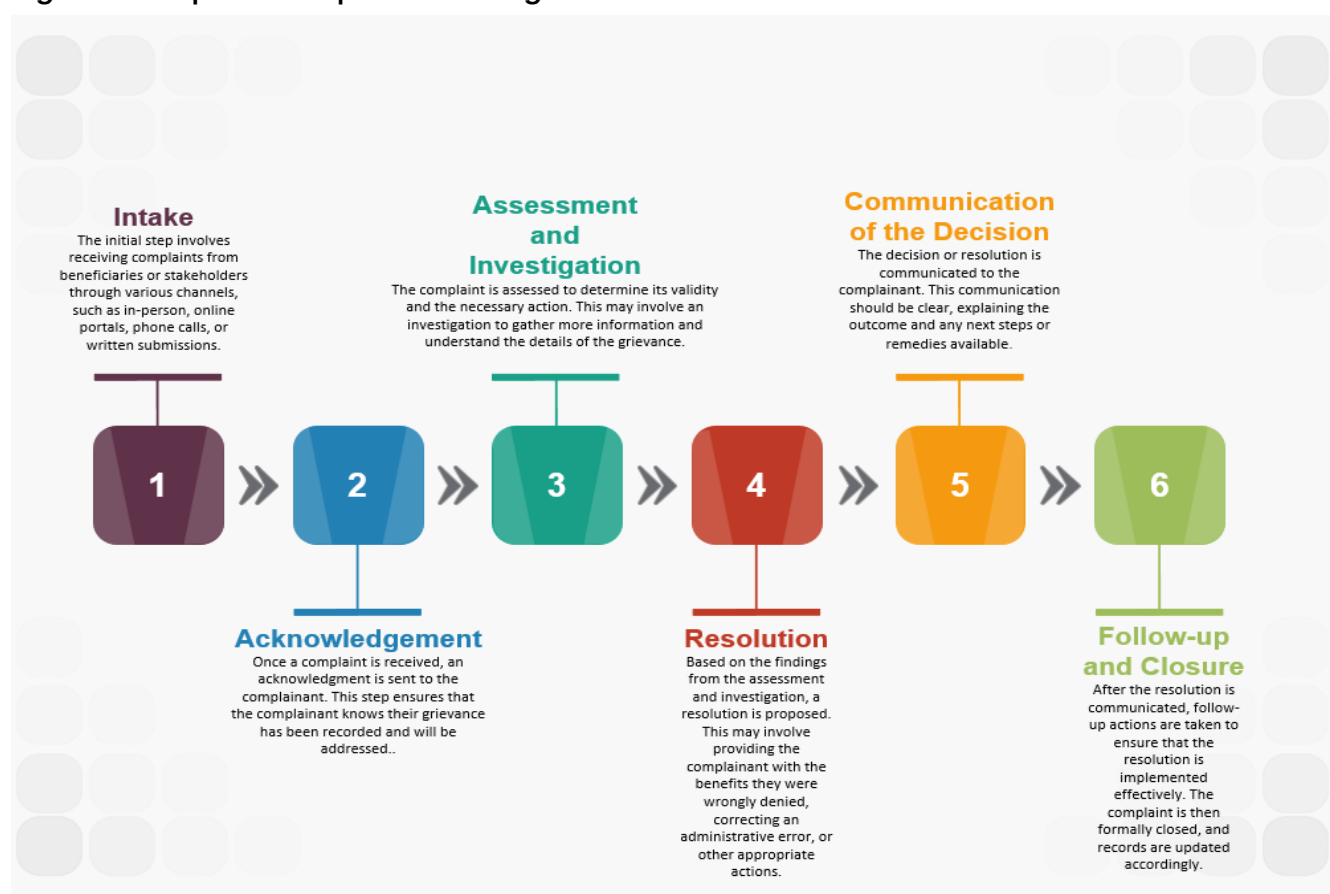
Schemes should plan for periodic performance audits for the complaints mechanism to check that it's meeting the expectation for which it was established. These audits should focus on two complaints parameters among others outputs & quality of outcomes. While it may be difficult to assess the contribution of the complaints mechanism on the overall performance of a scheme, it's still important to conduct these audits to provide an indication of whether the complaints mechanism is adding value to implementation

## 5.0 THE COMPLAINTS MANAGEMENT MODEL

Implementing a complaints mechanism requires that schemes focus on both the process and outcome. Schemes should ensure that complainants feel heard, respected, and taken seriously. Addressing concerns efficiently and taking appropriate actions is critical for achieving quality outcomes. Schemes should provide clear communication about the process and its limitations to manage expectations and ensuring that complainants feel that their issues have been handled fairly, even in difficult situations.

Therefore, in designing complaints mechanisms, schemes should follow six basic steps: intake, acknowledgement, assessment and investigation, resolution, communication of decision, follow-up and closure. This model explains what happens at every step, the actors involved, tools used and any other pertinent information to be considered. These steps are shown in the figure below.

**Figure 2: Steps in Complaints Management**



Source: *Author's Illustration*

The details of the steps are described below.

## **5.1 Intake.**

Schemes shall provide at least more than one channel for lodging a complaint. These channels should allow for the possibility of using various communication options that could be oral or written such as; the use of complaints form, dedicated portal on the website, written formal letter, phone call and other social media platforms (e.g. WhatsApp, Chat box, LinkedIn).

Duty bearers, such as Complaints or Help Desk Officers, should ideally be independent of those responsible for delivering the core services or benefits. All complaints (formal and informal) shall be documented and acknowledged promptly and the complainant informed of the timelines from acknowledgement to resolution. If the receiving officer doesn't understand/speak the local language, an interpreter shall be available to assist the process.

## **5.2 Acknowledgement.**

Schemes shall ensure that all complaints received are promptly acknowledged. This shall be accomplished through various methods, including email, letters, SMS, and other communication channels/options outline in under the step on intake above. Acknowledgement is crucial for building the complainant's confidence and empowering them to follow up, especially when reference numbers are provided.

## **5.3 Assessment and investigation**

Schemes shall ensure that complaints are classified by severity and complexity, so that serious complaints are escalated to appropriate levels. Receiving Officers shall be empowered to address minor complaints. Where a complaint cannot be dealt with immediately, the Receiving Officer shall record all relevant information (e.g., name, address, contact, complaint details, and category) and promptly forward it to the appropriate channel up the hierarchy. The mechanism shall specify the procedure and hierarchy for fast-tracking and escalating serious complaints.

Secondly, the mechanism shall have standardized procedures for investigating complaints, ensuring fairness and impartiality. It's recommended for Schemes that resolution of a complaint should ideally be completed within a month of the acknowledgment in the case of regular complaints, and forty-five days in the case of complaints involving complex issue(s).

## **5.4 Resolution.**

Duty bearers should strive to ensure speedy resolution while maintaining fairness and transparency in conducting investigations. If the complaint has merit, the investigating officer shall propose a resolution appropriate to the matter, e.g., restitution for wrongful denial, correction of administrative or data error, etc. For effective checks and balances, the resolution shall be approved by a higher authority.

## **5.5 Communication of Decision.**

Once the resolution is approved, the designated Complaint Officer shall communicate it to the complainant in a language he/she understands at the earliest opportunity at least in not more than one week.

### **Box 3: Considering a response to a complaint**

A complaint handling officer should give careful consideration when responding to a complaint. A response should be, timely, clear and appropriate. Effort should be made to enable the complainant understand the response, and it should address the issues raised in the individual's original complaint

The complainant shall be informed of their right to appeal, and the procedures of appeal, in case they wish to challenge the decision or seek further redress. The communication shall include the outcome of the investigation, a clear explanation of decisions made, changes implemented as a result of the complaint (where applicable), and options for review or appeal.

## **5.6 Follow up and Closure.**

After the resolution is communicated, the Complaint Officer shall ensure that the resolution is implemented effectively before formally closing the complaint and updating the records.

## 6.0 INTEGRATION AND HARMONISATION WITH GOVERNMENT SYSTEMS

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Schemes should, as much as possible, strive to integrate and harmonise the implementation of their complaints mechanisms with existing government systems and structures to enhance operational efficiency and sustainability. Integration and harmonisation will ensure the schemes' complaints mechanisms complement rather than duplicate existing Government systems.

### 6.1 Management Information System (MIS)

In order to manage complaints effectively and efficiently, Schemes should have a robust MIS for the whole programme, with special modules for complaints management. A robust MIS improves operational efficiency in business processes and to a greater extent reduces the probability of certain complaints occurring.

When designing the MIS for complaints for SP, key considerations should be made to create an efficient data collection tool specifically tailored to managing complaints in such schemes. Critical aspects such as data accuracy, consistency, and adaptability to diverse regions are important. They ensure that the system is both robust and flexible enough to address the unique challenges of complaints management.

Depending on the maturity and size of the scheme, an MIS for complaints can range from a basic system like an Excel-based module, to complex system with more integrated functionalities and processes. In both cases, what is important is to ensure its fitness for purpose. *The Guidelines* provides some basic MIS design parameters and requirements that can be adapted by schemes (See Annex 1 for details).

### 6.2 Integration with the National Single Registry (NSR)

Schemes shall ensure that their complaints MIS integrates with the national single registry (NSR) established at the MGLSD. Specifically, integrating the complaints MIS for schemes with the National Single Registry (NSR) provides a centralised system and strengthens the coordination and oversight mandate of the MGLSD. Schemes should leverage the NSR and other digital tools to streamline the complaints handling process and improve data management. MGLSD shall provide the protocols to be followed by schemes for this integration to happen.

### **6.3 A Unified Approach**

While recognizing the challenges involved, schemes should leverage existing government structures, such as the infrastructure and staff at various local government levels to avoid establishing parallel systems and ensure sustainability. If a scheme operates in a District Local Government, City or Municipal authority where another scheme has established complaints structures, the best practice is to integrate the complaints system into these structures rather than create new ones. In this way, anchoring the complaints in existing government structures will promote a unified approach to complaints management (See Section 8 for details on the unified secretariat).



## 7.0 TOWARDS A UNIFIED SECRETARIAT FOR SOCIAL PROTECTION

The National Social Protection Policy (NSPP) envisions that the delivery of Complaints Management across various schemes will be facilitated through a unified government secretariat by:

- a) integrating the complaints mechanisms of the schemes into established government structures;
- b) establishing strategic partnerships with government bodies responsible for complaint management.

### 7.1 Anchoring Scheme's Complaints in Government structures

Schemes are encouraged to collaborate with the Central Government, District Local Governments, City/Municipal Authorities to enhance service delivery. This unified approach aims to address concerns related to service quality, accessibility, timeliness, and individual rights. Additionally, it reinforces the coordination function of MGLSD in overseeing various schemes countrywide. Consequently, all schemes will align their complaints mechanisms with this unified approach at both national and sub-national levels.

### 7.2 Unified Approach at National Level

At the national level, the unified approach will be achieved by schemes implementing their complaints mechanisms in close coordination with MGLSD and its structures. The matrix below shows the actors and structures of the MGLSD that are available to support the implementation of complaints mechanisms for the schemes.

**Table 1 : Actors and Mandates of Government Structures at the National Level**

Actors/Structures	Mandates
Social Protection Committee	<ul style="list-style-type: none"><li>• Exercising strategic and policy oversight on the complaints mechanism of all schemes.</li><li>• Reviewing reports on the performance of complaints mechanisms of schemes.</li><li>• Undertaking field assessments for complaints systems established by schemes.</li></ul>
Permanent Secretary (PS)	<ul style="list-style-type: none"><li>• Chair the SP committee.</li><li>• Responsible for assessing compliance of schemes with <i>The Guidelines</i>.</li></ul>
Commissioner in charge Social Protection	<ul style="list-style-type: none"><li>• Responsible for monitoring the performance of the complaint's mechanisms for schemes.</li></ul>

Actors/Structures	Mandates
	<ul style="list-style-type: none"> <li>Responsible for leading investigation on complaints referred to the Ministry by the independent complaint's institutions where applicable.</li> <li>Support the PS in executing his/her mandate as provided.</li> </ul>
Head, ESP	<ul style="list-style-type: none"> <li>Chair of the SP Technical Working Group for reviewing the performance of the complaints systems for schemes.</li> <li>Support the Commissioner /SP in any investigation as required.</li> </ul>

### 7.3 Unified Approach at Sub-National Level

At the District, City, and Municipal levels, a unified secretariat approach shall be implemented for all schemes, utilising existing government staff and established structures. The table below outlines how government entities, actors, and their mandates can support a complaints mechanism for schemes.

**Table 2 : Actors and Mandates of Government Structures at the Sub- National Level**

Actors/ Structures	Mandates
Social Protection Committee  at District/ City/ Municipal level	<ul style="list-style-type: none"> <li>Exercising oversight on the complaint's mechanism of all schemes.</li> <li>Reviewing reports on the performance of complaints mechanisms of schemes.</li> <li>Monitoring the functionality of complaints systems established by schemes.</li> </ul>
Chief Administrative Officer (CAO)/ City Clerk & Municipal Town Clerk	<ul style="list-style-type: none"> <li>Responsible for chairing the SP committee</li> <li>Responsible for overall coordination of complaints mechanisms for all schemes through the District/City/Municipal coordination committee.</li> <li>Overall responsibility for monitoring the implementation of the complaint's mechanism for schemes.</li> <li>Responsible for addressing complaints relating to the unethical of Government staff involved in various schemes.</li> </ul>
District/City/ Municipal Community Development Officer (DCDO)	<ul style="list-style-type: none"> <li>Responsible for day-to-day coordination with the various schemes on complaints concerns within the auspices of the SP secretariat.</li> <li>Responsible for supervising and monitoring the performance of Lower level CDOs in the complaint's mechanism.</li> <li>Responsible for receiving or addressing any complaints referred that are within their mandate.</li> </ul>

	<ul style="list-style-type: none"> <li>• Responsible for creating public awareness of the complaints processes of the various schemes.</li> <li>• Responsible for escalating unresolved complaints from various schemes to the next level.</li> </ul>
Social Protection Committee at Sub-county/ Division level	<ul style="list-style-type: none"> <li>• Reviewing reports on the operational performance of the complaint's mechanisms of schemes.</li> <li>• Monitoring the functionality of complaints systems established by schemes.</li> <li>• Providing recommendation to schemes on how to address specific complaints concerns.</li> </ul>
Sub-County Chief/Division Town Clerk	<ul style="list-style-type: none"> <li>• Responsible for chairing the SP committee within their jurisdiction.</li> <li>• Responsible for performance management of the Sub-County /Division Community Development Officers.</li> <li>• Responsible for monitoring the implementation of the complaint's mechanism for schemes within their jurisdiction.</li> </ul>
Sub-County /Division Community Development Officers	<ul style="list-style-type: none"> <li>• Responsible for day-to-day coordination with various schemes on complaints concerns within the auspices of the SP secretariat.</li> <li>• Responsible for handling (resolving) any complaint within their mandate.</li> <li>• Responsible for collecting, and reviewing for completeness of all complaint reports received from the lower level.</li> <li>• Responsible for raising public awareness about the schemes and the availability of various channels for complaints reporting.</li> </ul>
Parish Chief/ Ward Agent	<ul style="list-style-type: none"> <li>• Serves as a primary point of contact/channel for beneficiaries and other stakeholders to lodge complaints regarding the schemes.</li> <li>• Responsible for submitting complaints raised to the schemes or designated office.</li> <li>• Responsible for handling (resolving) any complaint within their mandate.</li> <li>• Responsible for providing information and feedback.</li> <li>• Support public awareness on the availability of the various complaints reporting channels.</li> </ul>

## 7.4 Establish Strategic Partnerships with Government Bodies Mandated for Complaints Management.

While it's recommended that most complaints should be managed through the scheme's established complaints mechanism, certain situations can be handled through alternative channels. For example, some complainants may prefer to lodge their complaints with legally-established independent entities that specialise in complaints management. Secondly, schemes may receive complaints outside their jurisdiction that need to be referred to other mandated entities with their own independent complaints systems.

Consequently, schemes collaborating with these independent institutions offers several benefits for social protection schemes. These include:

- (i) **Expertise:** Implementers may encounter complaints requiring technical expertise that is not available within the scheme. Issues such as fraud, corruption, extortion, child abuse, and gender-based violence (GBV) may necessitate collaboration with specialised institutions for prompt resolution.
- (ii) **Conflict of Interest:** Partnering with independent entities minimises the risk of perceived bias in handling complaints against implementing entities, enhancing trust and satisfaction through impartial oversight.
- (iii) **Deterrence:** Publicising the scheme's collaboration with independent institutions can deter potential misconduct by making duty bearers aware of the consequences of their actions.
- (iv) **Efficiency:** Engaging independent institutions for complaints management allows schemes to concentrate on their core operations, reducing workload and administrative burdens.

To ensure that schemes are responsive and can effectively benefit from these strategic partnerships, the following recommendations should be considered:

- (i) **Formalise Relationships:** Establish memoranda of understanding (MoUs) with independent institutions to ensure proper handling of complaints and cooperation

during investigations. The MoUs should clarify funding arrangements where additional support will be required.

- (ii) **Guideline Prohibitions:** Ensure that complaints guidelines prohibit staff from attempting to resolve complaints outside their jurisdiction, such as cases of corruption, fraud, or sexual violence, which should be referred to appropriate authorities in compliance with existing national laws.
- (iii) **Referral Pathways:** Schemes should include clear referral pathways in the complaint guidelines (See details in Section 9). Procedures should be established for direct referrals or require duty bearers to inform complainants about the referral process for their cases.

## **8.0 REFERRAL PATHWAYS AND BODIES MANDATED FOR COMPLAINTS MANAGEMENT**

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Below is a brief description of several legally established Government bodies and their mandates that schemes can consider when instituting and or implementing their complaints management mechanism. While schemes may choose to collaborate with one or more of these institutions based on the nature of their SP interventions and the types of complaints anticipated, they are legally obligated to address the requirements set forth by these institutions.

### **8.1 National Council for Older Persons (NCOP).**

The National Council for Older Persons (NCOP) is an autonomous body established to advocate for the rights and welfare of older persons in Uganda. It acts as a voice for older persons, ensuring that their issues are heard and addressed at the highest levels of government. The NCOP's mandate empowers it to conduct or commission surveys and investigations in matters or incidents relating to: a) violation of the rights of older persons; and b) non-compliance with policies and programmes established. The NCOP can take appropriate action or refer matters to relevant authorities.

### **8.2 Equal Opportunities Commission (EOC).**

The Equal Opportunities Commission (EOC) is tasked with eliminating discrimination and promoting equality in Uganda. This mandate includes addressing complaints related to SP programmes, especially those involving older persons.

The EOC has the authority to investigate complaints, mediate disputes, and recommend corrective actions. Older persons can approach the EOC if they feel they have been unfairly treated or discriminated against in the administration of any social protection programmes.

### **8.3 The Uganda Human Rights Commission.**

Schemes can refer complaints related to human rights abuses to Uganda Human Rights Commission (UHRC). The UHRC, through the Directorate of Complaints, Investigations and Legal Services executes its mandate through the receipt, processing, investigation and resolution of complaints.

### **8.4 Inspectorate of Government (IG).**

The Inspectorate of Government (IG) is an independent institution responsible for promoting good governance and combating corruption in Uganda. The IG handles

complaints related to maladministration, abuse of office, extortion and corruption within public services, including SP programmes.

### **8.5 The Industrial Court and the Court for Alternative Dispute Resolutions.**

Uganda also has an Industrial Court, which deals with employer-employee conflicts, and the Court for Alternative Dispute Resolutions, which specialises in deploying alternative dispute resolution mechanisms and other ordinary technical court procedures.

### **8.6 The Magistrate's Court.**

The Local Council Courts Act, 2006 provides pathways for appeal to the Magistrate's Courts, which consist of Chief Magistrate, Magistrate Grade I, and Magistrate Grade II courts. These courts have powers and authority to hear other cases as outlined in the Magistrates Courts Act, Cap16.

### **8.7 The Uganda Police.**

The Uganda Police Force is mandated with the enforcement of law and order. It has the responsibility and mandate to investigate all criminal conducts and acts, after which it forwards its findings to the Directorate of Public Prosecution for review and sanctioning for any possible legal action before the court of law. The complaints mechanisms of schemes can refer any complaint of a criminal nature to the police for appropriate action as they deem necessary.

### **8.8 The Local Council (LC) Court.**

Established by the Local Council Courts Act, 2006, Act 13 of 2006, local council courts operate at the village, parish, town, division and sub-county levels for the administration of justice at the local level. The village (LC1) court is the court of first instance where complaints that fall outside the scheme's complaints mechanism can be lodged or referred.

## 9.0 SCHEMES WITH OUTSOURCED/MULTIPLE ENTITY COMPLAINTS MECHANISMS

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The design of some SP programmes involves implementation arrangements by more than one entity. This in some cases arises from prior consortium arrangements agreed between the parties, or when a scheme decides to sub-contract a component of its programme to a service provider with the required technical expertise to deliver. Schemes can sub-contract private entities to deliver services such as cash payments, or partner with civil society organisation to deliver services such as managing the scheme's complaints mechanism.

### **Box 4 : Benefits of out-sourcing a complaints system for SP**

Outsourcing the complaints function to experienced civil society organisations (CSOs) can help schemes save time and money by tackling difficult or long-standing issues. Funding these institutions to assist people with complaints in schemes can often be cost-effective. CSOs can assess needs, identify vulnerable clients, and offer early help to prevent future disputes. For best results, schemes should ensure that CSOs can connect with key staff early on to resolve problems. In communicating feedback, CSOs also help by clearly explaining decisions, making them easier for the complainant to understand and accept.

Complaints regarding contractors or partners can significantly affect the overall scheme, regardless of their source(s). Often, complaints may be mistakenly directed at entities perceived to be part of the scheme. To address such erroneous referrals, it's crucial to implement robust mechanisms for managing complaints, ensuring the availability of a streamlined and effective implementation process. The following measures should be considered when defining the relationships between the scheme and other entities involved in implementing the complaints mechanism:

#### **a) Establish Service Level Agreements (SLA).**

To improve the efficiency of complaints processes, schemes should establish SLAs with third-party entities that outline minimum service standards for complaints management. These agreements should require third parties to prioritise complaints handling and include enforceable penalties for non-compliance.

#### **b) Support Contractors to Establish Complaints Systems.**

Many sub-contractors, particularly those in the private sector, lack effective complaints systems for vulnerable populations. To address this deficiency, schemes should assist



contractors by sharing best practices for complaints management. Additionally, when multiple agencies provide SP services, a clear complaints process should be established, outlining how to contact the right agency, request information, track responses, and evaluate quality. Agencies should also agree on protocols for handling complaints and clarifying responsibilities in overlapping cases.

c) **Invest in Public Awareness of Complaints systems.**

Where a scheme involves multiple partners, it's essential to invest in public awareness campaigns about available complaints mechanisms. Such awareness campaigns should clarify the roles of each entity, outline which complaints can be submitted to whom, specify submission points, and provide expected timeframes for resolution.

## 10.0 CONTINUOUS LEARNING AND IMPROVEMENT

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Schemes shall be committed to learning and improving the effectiveness and efficiency of their complaint management system. In doing so, they shall prioritize the most appropriate resolution option on all the complaints reported. In addition, they will provide an enabling environment for innovations and for implementing best practices in the complaint's management process.

Schemes should also establish a feedback system for assessing staff performance and have a reward system that appreciates those who continuously exhibit and implement exemplary practices in complaints management. Lastly, using data from the complaints reported, schemes should regularly conduct analysis and implement changes that will improve the system and also continue to monitor the system performance.

## 11.0 MONITORING AND EVALUATION

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It's important that schemes intentionally review the performance of their complaints systems. Schemes should develop Key Performance Indicators (KPIs) to measure the mechanism's effectiveness. Schemes should undertake periodic reviews and surveys (annual or biannual) to identify trends and bottlenecks, measure usage and relevance to target beneficiaries and correct deficiencies where necessary.

Some of the important reporting parameters that schemes can consider in their M&E framework for complaints management include; number of complaints received the outcome of complaints, number of complaints resolved at the various levels, emerging issues from complaints, systemic issues identified, and the number of reviews/appeals lodged.

*Below are some specific roles the M&E function will play in strengthening the complaints management system:*

- Determining whether the complaints mechanisms of the schemes are functioning as intended and meeting the needs of beneficiaries.
- Identifying areas for improvement in the complaints system. Regular evaluations can uncover systemic issues or bottlenecks in the complaints process, allowing for timely adjustments and enhancements.
- Strengthening data-driven decision making in schemes. Collecting and analysing data on complaints can inform policy decisions, helping to tailor services and improve overall programme effectiveness.
- Ensuring increased accountability of the schemes. M&E fosters accountability by tracking how complaints are handled and ensuring that organisations adhere to established protocols and standards.
- Enhancing beneficiary trust by demonstrating that complaints are taken seriously and acted upon. This can encourage beneficiaries to engage more fully with the system.
- Providing a basis for justifying resource allocation for complaints management. Understanding the volume and nature of complaints can help schemes allocate resources more effectively, targeting areas that require more support.

Investing in M&E for complaints mechanisms not only strengthens the integrity and responsiveness of SP schemes but also ensures that they better serve the needs of their constituents.

## 12.0 ANNEXES

### Annex 1: Example of a Basic Excel-Based MIS for Complaints Management

FIELDS	DESCRIPTION/ENTRY/FINDINGS
Beneficiary ID	
Full Name	
Gender	
Date of Birth	
Contact Information	
Residential Address	
Identity Document	
Complaint ID	
Complaint Type	
Complaint Description	
Date of Complaint	
Supporting Documents	
Priority Level	
Programme Code	
Service Delivery Location	
Service Type	
Complaints Status	
Assigned Officer	
Date of Status Update	
Resolution Timeframe	
Resolution Description	
Resolution Outcome	
Resolution Date	
Beneficiary Feedback	
Satisfaction Rating	
Escalation Level	
Escalation Date	
Escalation Officer/Agency	
Additional Notes	

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**THE REPUBLIC OF UGANDA**  
MINISTRY OF GENDER,  
LABOUR & SOCIAL DEVELOPMENT

## **Vision**

A better standard of living, equity and social cohesion

## **Mission**

Promotion of gender equality, social protection and transformation of communities

## **Goal**

Promote employment and productivity, positive cultural values, rights of vulnerable groups and gender responsive development

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### **The Expanding Social Protection Programme Management Unit**

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**World Food  
Programme**

**unicef**   
for every child