

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

EXPANDING SOCIAL PROTECTION PROGRAMME SENIOR CITIZEN'S GRANT

Complaints and Grievances
Management Guidelines

November 2024

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FOREWORD

The Ministry of Gender, Labour and Social Development (MGLSD) is proud to present the updated Complaints and Grievance Management Guidelines for the Senior Citizens' Grant (SCG). These guidelines represent our commitment to enhancing the quality of services for Uganda's elderly population enrolled in the SCG.

The SCG, a flagship Social Protection initiative of the MGLSD, is designed to provide regular direct income to over 345,000 elderly beneficiaries across the country. As we strive to improve the quality and effectiveness of our services, we recognize that a robust complaints and grievance management system is crucial. It serves not only as a mechanism for feedback but also as a vital tool for promoting transparency, accountability, and responsiveness to the needs of our beneficiaries.

These guidelines have been developed with input from various stakeholders, including government officials, technical experts, and beneficiaries themselves. They are intended to provide clear, user-friendly procedures for reporting, investigating, and resolving complaints and grievances related to the SCG program. By empowering Local Governments and program staff with these guidelines, we aim to ensure that every voice is heard and that concerns are addressed promptly and effectively.

We are grateful for the support of our partners, particularly the World Food Programme (WFP), and acknowledge the invaluable contributions of everyone involved in this process. As we implement these guidelines, we remain committed to continuously improving our systems to better serve our elderly population.

Together, we can build a more inclusive and responsive social protection system that not only meets the needs of our beneficiaries but also fosters trust and accountability within our communities.



A.D Kibenge
PERMANENT SECRETARY

ACKNOWLEDGEMENT

The Ministry of Gender, Labour and Social Development (MGLSD), in partnership with the World Food Programme (WFP), has updated the Complaints and Grievance Management Guidelines to provide clear, user-friendly procedures for reporting, processing, investigating, and resolving complaints and grievances under the Senior Citizens' Grant (SCG).

This update underscores the MGLSD's commitment to implementing responsive social protection programmes that build trust among beneficiaries and promote accountability. The strategic aim of these guidelines is to ensure timely resolution of complaints and grievances by decentralizing mandates for complaints management and promoting resolution at the lowest possible level.

We extend our deepest gratitude to the WFP for funding and supporting the MGLSD in this process. Special thanks go to WFP staff members Daniel Winter Putan and Emily Awili for their contributions. We also appreciate the invaluable insights and guidance from the RTSU staff and members of the Technical Working Group (TWG), which were vital in shaping the Guidelines.

I would like to especially thank Mr. Pius Ongom Okello, the consultant hired to update the guidelines, for his excellent work. While we cannot acknowledge everyone, who contributed to the development of these guidelines, we are particularly grateful to Mr. Paul Onapa, Deputy Head of the ESP Programme Management Unit; Sam Acodu, SAGE Operations Coordinator; Simon Ogaya, Senior Programme Officer Operations and Jimmy Hilton Opio, Senior Programme Officer Complaints and Grievance Management.

Lastly, we recognize the invaluable contributions from staff in the Community Development Departments of the districts of Moroto, Napak, and Bududa. We are especially grateful to the sub-county staff from Bulucheke in Bududa District, Katikekile in Moroto, and Matany in Napak for organizing the community consultation sessions.

We look forward to implementing the revised guidelines.



Stephen Kasaija

HEAD, ESP PROGRAMME MANAGEMENT UNIT

ABBREVIATIONS

AR	Alternative Recipient
C & G	Complaints and Grievances
CAO	Chief Administrative Officer
CDO	Community Development Officer
CERUDEB	Centenary Rural Development Bank
CMS	Case Management System
CSO	Civil Society Organisation
DAR	District Appeals Report
DCDO	District Community Development Officer
DCR	District Complaints Register
DTR	District Transmission Register
DIS	Direct Income Support
DLG	District Local Government
EOC	Equal Opportunities Commission
ESP	Expanding Social Protection
ESP II	Expanding Social Protection Phase II
GoU	Government of Uganda
HRA	Human Resource and Administration
IG	Inspectorate of Government
IGG	Inspector General of Government
LTA	Long-Term Arrangement
M&E	Monitoring and Evaluation
MDA	Ministries and Departmental Agencies
MERL	Monitoring Evaluation Research and Learning
MGLSD	Ministry of Gender, Labour and Social Development
MIS	Management Information System
MoFPED	Ministry of Finance Planning and Economic Development
MoU	Memorandum of Understanding
NAADS	National Agricultural Advisory Services
NCOP	National Council for Older Persons
NGOs	Non-Governmental Organisations
NIN	National Identification Number

NIRA	National Identification and Registration Authority
NoK	Next of Kin
NSPP	National Social Protection Policy
NSR	National Single Registry
NUSAf	Northern Uganda Social Action Fund
OPC	Older Persons Council
OPM	Office of the Prime Minister
PMU	Programme Management Unit
PS	Permanent Secretary
PSP	Payment Service Provider
QA	Quality Assurance
RCC	Resident City Commissioner
RDC	Resident District/City Commissioner
RTSU	Regional Technical Support Unit
SAGE	Social Assistance Grants for Empowerment
SCDO	Senior Community Development Officer
SCG	Senior Citizens Grant
SLA	Service Level Agreement
SOO	Senior Operating Officer
SOPs	Standard Operating Procedures
SP	Social Protection
SPO	Senior Programme Officer
SVC	Sub-county Vetting Committee
URSB	Uganda Registration Service Bureau
WFP	World Food Programme

DEFINITION OF TERMS

In this guideline, we have provided below standard definitions of key terms and specifically contextualised them to the implementation of the SCG programme.

Alternate Recipient (AR)	Is a person authorized by an SCG beneficiary to receive the grant on their behalf for various reasons including inability to pick the grant due to frailty
Appeals	These entail concerns about the correctness of decisions made by the programme. An appeal may also refer to an expression of dissatisfaction with the outcome of a prior complaint on the programme or payment service or the manner in which the complaint was resolved
Change Management	Refers to actions taken by the programme in response to changes in a beneficiary's circumstances that affect their information and/or status in the programme. These changes include the death of a beneficiary, the appointment of a new alternative recipient, and others
Closure	Formal procedures for closing complaints & grievances, including giving the complainant feedback regarding the outcome and any follow-up actions.
Complainant	Refers to a person a complaint or grievance about any aspects of the programme or payment services.
Complaints	Concerns or expression of discontent with the programme administration throughout the implementation cycle. It is a "formal" expression of dissatisfaction about a service by the programme or the payment service provider that needs a response
Complaints & Grievance Mechanism	Entails the procedures and structures for receiving, filing, reviewing and resolving concerns arising from the implementation of the programme or payment service
Complaints Desk	Any service point established by the programme or payment service provider to receive complaints or provide relevant information
Complaints Officer	A person who is responsible or who has been assigned in the complaint's management process investigate and or resolve complaints.
Feedback	Refers to any comment, positive or negative, that any interested party wants to share to improve services
Grievances	A situation where there has been a violation of a beneficiary's rights under the programme. The definition includes serious ethical concerns and allegations against the programme's or the payment service provider's (PSP's) staff, for cases such as fraud, mistreatment of the beneficiaries, and abuses
Grievance Receipt	This involves receiving complaints and grievances through the various channels established or provided for in the guidelines. Complainants and

aggrieved persons should ensure that there is proof of receipt, for instance by insisting on being issued with a tear-off, a receipt, paper or digital trail, or any kind of "proof" that they have lodged a complaint or a grievance and the same has been duly received.	
Investigation	Structured process for verifying the validity and details of a complaint, grievance or an appeal to ensure the fairness of the remedy or resolution.
Lodging	Lodging is the making of a formal or official complaint about any aspects of the programme or payment service
Next of Kin	Is a person appointed by an SCG beneficiary or family (in the case where no appointed is made by the beneficiary at the time of death) to be responsible for all funds on their account or any other entitlements from the SCG programme when they die.
Receiving Officer	A person who is responsible or who has been assigned to receive and record complaints of beneficiaries
Resolution	A decision taken or remedy granted by the programme management or PSP following the investigation of a complaint or grievance lodged by the complaint or aggrieved person. This should be arrived at in a fair and timely manner, and should involve notifying the complainant of other options including mechanisms for escalating unresolved issues to a higher level or authority.
Social Protection	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. In Uganda, the SP system comprises social security, social care, and services.

CHAPTER 1: BACKGROUND TO THE SENIOR CITIZENS GRANT

The Senior Citizen Grant (SCG) is a universal social cash transfer programme for the elderly under the Ministry of Gender, Labour, and Social Development (MGLSD) and funded by the Government of Uganda (GoU). The SCG is categorized as a non-contributory transfer scheme (direct income transfer) targeting the vulnerable elderly persons. The SCG exemplifies the Government's efforts and commitment towards the implementation of the Social Security Pillar of the National Social Protection Policy (NSPP, 2015).

Under the MGLSD, the SCG¹ is implemented as a component of the Social Assistance Grant for Empowerment (SAGE) and part of the wider Expanding Social Protection programme (ESP). The overarching goal of the ESP is to reduce chronic poverty and improve life chances for poor men, women, and children in Uganda. The programme aims at embedding a national SP system, including social assistance for the poorest and most vulnerable (direct income support), as a core element of Uganda's national planning and budgeting processes.

In order to strengthen the implementation of ESP, a secretariat was established hosting a Programme Management Unit (PMU) that, among other has the responsibility of coordinating the implementation of SCG. The implementation of the SCG is supported by ten (10) Regional Technical Support Units (RTSUs) established and distributed across the country to support the district local governments in the day-to-day operations of the programme. The frontline implementation of the SCG is led by the district local governments in close collaboration with regional and national stakeholders.

Specifically, the SCG targets the elderly to mitigate age-related vulnerabilities and alleviate poverty. Under the SCG program, eligible Ugandan citizens can enroll to receive a monthly cash grant of UGX 25,000 shillings that is delivered through a contracted payment service provider. To be enrolled for the SCG, individuals must meet the following eligibility criteria:

- Must be Ugandan citizen
- Must be 80 years and above
- Must have registered for the National Identification Card with the National Identification and Registration Authority (NIRA); and
- Must not be a pensioner or eligible for a public service pension.

¹ Even though SCG and SAGE are often used interchangeably in key documents such as Implementation Guidelines for the Senior Citizens Grant (2019), the former is in the strict sense a component of the latter

1.1 OVERVIEW OF THE SCG IMPLEMENTATION STEPS/CYCLE

Implementation of the SCG is guided by the SAGE Implementation Guidelines (2019)². The Guidelines set out a clear pathway from beneficiary identification to payment. The Guidelines outline four core steps that systematically follow each other, namely, targeting, verification, enrolment, and payments. These steps are summarized box below;

Box 1: SCG Implementation Steps

Step 1: Targeting

The programme obtains primary data from the National Identification and Registration Authority (NIRA) and applies approved targeting criteria to select potential beneficiaries. This targeting process is automated in the SAGE Management Information System (SAGEMIS), which validates the data to exclude anyone who is a pensioner or eligible for government pension. The outcome of this process is a provisional beneficiary list that is then used for verification in the field.

Step 2: Verification

The provisional beneficiary list is used to verify the existence, identity, and eligibility of potential beneficiaries. This process is led by the DLG and supported by the RTSU programme team. The exercise primarily entails verifying the national identity card details to determine eligibility based on age. In the absence of a national ID, the programme relies on the NIN confirmation letter from NIRA because it's linked to their respective national identification details. The outcome of this process is a verified beneficiary list.

Step 3: Registration and Enrolment

Previously, this was a two-stage procedure, however, lessons learned from implementation informed their merger to enhance efficiency in the registration and enrolment process. In this step, eligible persons the verification stage are required to consent to participate in the SCG programme by completing the SCG registration form (currently digitized), which qualifies them to be added to the beneficiary list (persons registered in the programme). Individuals successfully registered are then directed to open an account with the PSP and subsequently added to the enrolment list. The details of enrolled individuals are updated in the SAGEMIS for inclusion in the payroll. The outcome of these processes are a Registration and enrolment list.

² While the SAGE Implementation Guidelines (2019) form the foundation for the SCG implementation, there have been some changes in the programme addressed through supplementary guidelines and promoting practices that have worked. The current SAGE implementation guidelines do not reflect the practice of the programme and will need to be updated.

Step 4: Payments

Beneficiary payments are usually made every quarter at designated pay points following the standard operating procedures of a GOU-contracted PSP. The payments follow a two-stage process; (a) crediting beneficiary accounts with the right entitlements, and (b) disbursing/distributing the cash to beneficiaries whose accounts were credited. The crediting of beneficiary accounts is accomplished through administrative procedures undertaken between the programme and the PSP. The disbursement of cash is through a GOU contracted PSP and via designated channels (currently the main channel).

Besides the above core steps, the guidelines also outline three additional processes to manage various programme concerns and address barriers that individuals may face in accessing SCG services, namely:

(i) Complaints and Grievances Management.

This mechanism was established to address dissatisfaction and concerns raised by any programme beneficiary or stakeholder. Complaints in the SCGE are reported mainly through a paper-based form (SCG Complaints Form) obtained from the Parish chief/ town agent. This mechanism, however, has not met the expectations of stakeholders. It is not fit for purpose and has not adequately reflected the challenges the programme was facing. This shortcoming partly formed the basis for this revised version.

(ii) Change Management

This process is primarily focused on facilitating legitimate changes to the beneficiary's information. Change Management, therefore, defines changes involving beneficiaries' information and/or status on the programme, such as the death of a beneficiary or change of the alternative recipient, etc. Currently, these changes are recorded using specific programme forms and updated in the SAGEMIS, although plans are to digitise in the future. Accordingly, other foreseen updates such as; Request for PSP change, Updates of the Next of Kin, Changes in contact details among others will need to be included in the change management protocols.

(iii) Communication:

Effective and proactive communication on various programme aspects is crucial in reducing the number of complaints in the SCG. By providing stakeholders with adequate information, they are better equipped to make decisions. Consequently, when such an individual decides to lodge a complaint, it is probably based on a thorough understanding of the programme. To address potential concerns holistically, the programme and PSP should implement targeted communication strategies.

1.2 RATIONALE FOR ESTABLISHING A ROBUST C&G MECHANISM

A robust and transparent complaints and grievances management system is a vital component for effective delivery of Social Protection (SP) programmes. The Uganda Social Protection Sub-Sector Review 2019, noted that a robust C&G mechanism is relevant for the realization of the SP agenda, which entails providing care, support, protection, and empowerment to vulnerable individuals who are unable to fully care for themselves.

The SCG programme is not just about delivering the cash grant to the elderly but also about their rights and empowerment. This is where the C&G mechanism plays a vital role. The C&G system helps in protecting the rights of SCG beneficiaries as articulated in the ESP programme charter.

Box 2: Rights of Beneficiaries that are provided for in the ESP Programme Charter

1. The right to be informed of all their rights and responsibilities, developments and all key policy decisions regarding the Programme;
2. The right to understand all aspects of the Programme and to make informed decisions
3. The right to be treated fairly and with respect and dignity at all times, irrespective of gender, ethnicity, age or any other status;
4. The right to privacy and confidentiality;
5. The right to raise grievances, concerns or complaints regarding the Programme, its staff, local leaders or Programme contractors, at any point of implementation, in confidence, without fear of coercion, discrimination or reprisal;
6. The right to appeal in case of unfair exclusion from registration;
7. The right to opt out of the Programme at any time, if and when they so wish;
8. The right to interact with Programme officials and receive information in one's language of choice irrespective of educational attainment, age or gender.

Other benefits of an effective C&G system for the SCG programme include:

- i) It measures the level of satisfaction that beneficiaries and other stakeholders have with the quality of services in the programme. For programmes such as the SCG, addressing complaints is critical for converting dissatisfied individuals into satisfied ones.
- ii) Enabling beneficiaries to seek redress for grievances and provide feedback on services delivered, thereby promoting transparency and accountability in the programme.
- iii) Providing information that is vital for strengthening the overall implementation of the SCG. A functional C&G system acts like a “dashboard” that alerts programme managers to areas that may require attention.
- iv) Measuring of the success of programme implementation by building beneficiaries' trust in the programme.

- v) Helps in promoting accountability by highlighting minimum standard of service delivery and the roles and responsibilities of duty bearers towards ensuring effective and effective service delivery.
- vi) A robust complaints mechanism that receives and responds to complaints will greatly enhance the achievement of the SCG objectives.

1.3 OVERVIEW AND PURPOSE OF THE GUIDELINES

The SCG's Complaints and Grievance (C&G) Guidelines has been developed to establish clear, transparent, efficient and accountable procedures for addressing the concerns (complaints, grievances, and appeals) raised by beneficiaries and other stakeholders on the SCG.

The Guidelines outlines Standard Operating Procedures (SOPs) for various cases and describes how a complaints officer should manage the various complaints workflows. It also provides the tools for documenting processes of report and feedback.

One of the key tools for enhancing efficiency in the C&G process is the C&G Module of the SAGEMIS. The SAGEMIS plays three main functions in the C&G process;

- a) Serves as a central repository for all data related to various complaints reported.
- b) keeps records of all actions taken on each complaint by the responsible duty bearers
- c) Automates the dissemination of feedback through the "SMS" facility.

In terms of scope, these Guidelines are limited to addressing concerns that have been raised "formally" and require a response from the programme. system will not have any jurisdiction over concerns that;

- a) have been raised informally or outside the established system
- b) are not related to SCG implementation.

Lastly, the implementation of the guidelines emphasizes the importance of continuous improvement. The Guidelines constitutes an essential element of the programmer's commitment to serving older persons with dignity and respect. Providing a clear and effective mechanism for addressing complaints and grievances will enable the SCG programme to remain responsive, transparent, and accountable to the needs of its beneficiaries.

1.4 GUIDING PRINCIPLES AND VALUES FOR AN EFFECTIVE SCG C&G MECHANISM

The following principles and values underpin the development of the SCG C&G guidelines;

A. PRINCIPLES

Accessibility	Lodging a complaint, grievance or appeal in the SCG shall be free of charge, easy to access the service points and simple to understand for anyone who intends to do so.
Inclusivity	The C&G system will be accessible to beneficiaries and other stakeholders without discrimination or barriers. People with disabilities, the elderly or illiterate will be supported to access the service
Simplicity	The reporting and resolution process shall be simple enough for complainants to easily understand and for the implementers to use
Responsiveness	To increase confidence in the C&G system, all complaints shall be acknowledged promptly at the point of (a) reporting (tear off), (b) logging it in the SAGEMIS, and (c) resolution or closure. The C&G guidelines have been developed based on experiences from the SCG implementation to ensure responsiveness to the needs of the complainants
Independence	The implementation of the SCG C&G system shall be independent of other programme business processes to guarantee fair, objective, and impartial treatment. In addition, there will be checks and balances on the procedures to reduce the risk of abuse by one individual

B. VALUES

Beneficiary/ Client focused	All the staff under the programme, the PSP and the DLG who are involved in the implementation of the SCG C&G processes will ensure the delivery of beneficiary/client-centred services. A lot of care will be taken to ensure that complainants are given due attention to enable them lodge their complaints competently.
Timeliness	This entails effectively and efficiently addressing complaints and grievances in a timely manner. The guidelines will emphasize to a greater extent complaint be resolved at source by duty bearers or at the lowest level possible to enhance satisfaction with the programme.

	Efforts will be made to value complainants and great importance will be attached to the feedback they provide
Confidentiality	All complaints and grievances shall be treated confidentially. No personal information shall be disclosed to third parties. Information on the complaints shall be accessible only to those that are mandated to take-action in the resolution process.

By adhering to these principles and values, ESP/SAGE PMU seeks to foster a supportive environment where all complaints and Grievances are taken seriously and addressed appropriately.

1.5 INTENDED USERS OF THE SCG C&G GUIDELINES

The Guidelines was primarily developed to support the implementers of the SCG C&G mechanism and other stakeholders such as; policy makers, SCG beneficiaries and general public. The core implementers of the SCG include the staff of ESP and those of the District Local Government especially those under the Department of Community Services. The users are listed below with their obligations;

1. MGLSD/ESP Senior Management

Responsible for policy guidance and overseeing the implementation of the SCG and C&G guidelines. They include; the PS, Head ESP and Deputy Head, ESP.

2. PMU and SAGE Staff at PMU

Responsible for the SCG coordination at the national level. They include all the SCG Operations Unit staff at the PMU HQ under the leadership of the SCG Coordinator, namely: The Senior Operations Officer, SPO MIS, SPO C&G, SPO, Capacity Building, and SPO M&E.

3. RTSU Staff

Responsible for providing technical support to the District Local Governments in the implementation of the SCG. These staff are; the RTSU Coordinators, Operations Officers and Administration Officers.

4. CAO, Municipal & City Town Clerks

Responsible for overseeing the implementation of the SCG and these guidelines in their jurisdiction.

5. LG, Municipal & City Town Technical Staff

Responsible for implementation of the programme in their jurisdiction. These include; the City, Municipal or District CDO, SCDO-SAGE, Division/Sub-county CDOs and all the Parish chief/ town agents or Ward agents.

6. Eligible persons, Beneficiaries, and caregivers

7. Other Stakeholders

Any other individuals or groups that feel affected by the implementation or decisions of the SCG programme, such as persons excluded from the programme

CHAPTER 2: LEGAL AND POLICY FRAMEWORK

The implementation of the SCG C&G mechanism is supported by several legal and policy frameworks Uganda has enacted a number of legal and policy instruments that are geared towards building an inclusive society and robust social protection system. The most important policy in the Social Protection sector is the National Social Protection Policy, NSPP (2015), which specifies the objectives and intentions for social protection. In addition to the NSPP, there are a number of other policies that articulate the objectives of implementing a robust complaints and grievance mechanisms for programmes such as the SCG. The relevant legal and policy frameworks are summarized below;

2.1 THE LEGAL FRAMEWORK

2.1.1 The Constitution of Uganda

The 1995 Constitution, as Uganda's supreme law, guarantees protection from victimization for lodging complaints or grievances. Relatedly, it also provides in paragraph XIV of its National Objectives and Directive Principles of State Policy, that the State shall endeavor to fulfil the fundamental rights of all Ugandans to social justice and economic development.

The provision is reinforced by Article 32 of the Constitution which mandates affirmative action to address historical imbalances and protect marginalized groups and this supports the establishment of SP mechanisms. Relatedly, article 38 guarantees the right of every Ugandan to participate in governance and access justice, which is the foundation for a complaints and grievances mechanism.

2.1.2 Specific Laws and Regulations

The Ugandan Parliament has enacted several laws that supports the C&G mechanism function. The following are notable examples:

- i) **The National Social** Security Fund Act, 1985 (as amended), focuses primarily on formal sector workers, providing mechanisms for handling complaints related to social security contributions and benefits and has provisions that are relevant to the design of GRMs.
- ii) **The Employment Act, 2006**, Section 93 provides for the arbitration and settlement of Labour disputes and mechanisms for resolving employment-related disputes, including those that affect SP beneficiaries of contributory and non-contributory schemes.

- iii) **The Workers Compensation Act, 2000** provides a framework for compensation of workers for injuries suffered or diseases contracted in the course of employment. The Act includes provisions for addressing disputes regarding compensation claims.
- iv) **The Equal Opportunities Commission Act, 2007** establishes the Equal Opportunities Commission (EOC), which addresses complaints related to discrimination and inequity, including those affecting beneficiaries of programmes.
- v) **The Public Finance Management Act, 2015** governs the management of public finances, including allocations and disbursements of funds for SP programmes. C&Gs arising from the misuse or misallocation of funds can be addressed under this Act.
- vi) **The Whistle-blowers Protection Act, 2010** provides for procedures through which individuals in both private and public sector can disclose information about irregular, illegal and corrupt practices. The Act protect-blowers or persons who provide disclosure of improprieties from victimization as guaranteed by both the Constitution and other applicable laws.
- vii) **The National Council for Older Persons Act, 2013** establishes the National Council for Older Persons, which advocates for the rights and welfare of elderly persons. It includes provisions for receiving and addressing C&Gs from elderly persons regarding under SP programmes.

2.2 THE POLICY FRAMEWORK

2.2.1 The National Social Protection Policy (NSPP), 2015

This policy instrument serves as a policy cornerstone in the SP sub-sector. The policy addresses unique vulnerabilities and risks faced by a section of poor population that are unable to participate in viable economic activities. It provides a comprehensive approach to social protection in Uganda, encompassing social assistance, social insurance, and Labour market interventions.

The policy emphasizes the need for transparent and accessible grievance redress mechanisms to ensure accountability and responsiveness to the needs of beneficiaries, including older persons. It underscores the importance of having robust C&GM systems in place to handle complaints effectively, ensuring that older persons can seek redress for any issues they encounter within social protection programs.

2.2.2 Other Policy Instruments.

Uganda has passed specific policies on special interest groups that are typically targeted by SP programmes, notable among them are the following:

- i) **The National Policy for Older Persons, 2009.** Focuses on promoting and protecting the rights of the elderly persons. The policy acknowledges the unique vulnerabilities of the elderly and the necessity of safeguarding their rights within social protection schemes. It stipulates the establishment of dedicated C&G mechanism to handle concerns from older persons, ensuring they have specific channels through which to voice their concerns and seek resolution.
- ii) **The National Equal Opportunities Policy, 2006.** Translates Article 21 of the Constitution and other rights-sensitive provisions such as Articles 35 and 36 on the rights of PWDs and the protection of minorities, respectively, with the aims of ensuring equal access to opportunities and prohibition of any kind of discrimination.
- iii) **National Child Policy, 2020.** Seeks to the rights and welfare of children and protect them from abuse and neglect. The policy particularly protects children notably from sexual abuse, child Labour, child trafficking, and denial of the rights or access to services. The policy provides for guidelines for referring infringements and violations to relevant authorities including children's welfare officers, the police, courts of law and health Centres.
- iv) **The National Disability Policy, 2006.** Protects PWDs against abuse and exploitation; discrimination and denial of services; and insensitivity to the concerns, interests, rights, welfare and vulnerability of PWDs.
- v) **National Gender Policy, 2007.** Protects sexual harassment, transactional sex (sex for service), sexual violence, domestic violence, emotional and/or psychological harm, physical harm or assault and denial of economic rights. The policy provides for guidelines for referring infringements and violations to programme implementers. Where there is fear of conflict of interest or jurisdictional issues, infringements and violations can be reported to relevant government authorities including the police, courts of law, and health centers.

The policies above ensure that programme beneficiaries have multiple channels for lodging complaints and seeking redress, thereby contributing towards the culture of accountability, transparency and responsiveness of SP programmes.

CHAPTER 3: INSTITUTIONS, ACTORS AND MANDATES IN THE C&G MECHANISM

The SCG is implemented through Government structures. The institutional framework for complaints and grievance mechanism involves duty bearers at the national, district, city or municipal level. The overall responsibility for policy oversight on the C&G mechanism rests with the PS, MGLSD.

At the PMU level, the Head ESP and Deputy Head are responsible for performance management of the implementation of the C&G mechanism in the SCG programme. Within the PMU, the SCG Coordinator is responsible for the overall implementation of the C&G mechanism. The Senior Programme Officer Complaints & Grievances is designated as the dedicated Complaints Mechanism Manager at national level. He/she is responsible for the day-to-day management of the C&G work stream and to support the RTSUs. The SPO C&G reports to the SCG Coordinator.

At the regional level, the RTSU Coordinator is the C&G Complaints Mechanism Manager. He/she discharges this function with the support of Operations and Administration Officers based at the region. The RTSU Coordinator shall be responsible for sorting complaints that require either local or national-level resolution. The RTSU coordinator will also be responsible for the closure of complaints that have been locally resolved and referring cases to the national level for resolution.

The responsibilities of the various actors in the SCG C&G mechanism are summarized in the table below.

Table 1: National and Regional Level Actors and Mandates

Institution	Actor	Roles/Mandates
MGLSD PMU	Permanent Secretary	<ul style="list-style-type: none"> Provides strategic and policy oversight over the C&G mechanism. Provides leadership in addressing complaints referred from independent complaints management institutions.
	Head PMU	<ul style="list-style-type: none"> Oversee the operational performance of the C&G system. Supports the PS in any investigation as required.
	Deputy Head PMU	<ul style="list-style-type: none"> Reviews the PSP's performance on C&G functions as per signed SLA/Contract. Responsible for communications and follow-ups on complaints to be resolved by the PSP. Performs delegated function from the Head, ESP.

Institution	Actor	Roles/Mandates
	SAGE Operations Coordinator	<ul style="list-style-type: none"> • Overall Coordinator of the implementation of the SCG C&G • Supervises RTSU Coordinators on C&G key performance indicators. • Supports the SPO C&G in following up resolutions of complaints with the PSP. • Supervises the performance of the SPO C&G.
	Senior Operations Officer SAGE	<ul style="list-style-type: none"> • Responsible for leading national investigations and providing resolutions to complaints escalated (referred) to the PMU HQ. • Approving case closure in the MIS based on the outcomes of an investigation or recommendations of a complaints review. • Performs delegated functions from the SAGE Coordinator
	Senior Programme Officer, C&G	<ul style="list-style-type: none"> • Has the responsibility as the National Complaints Manager tasked with coordinating the overall implementation of the SCG C&G mechanism. • Managing the SCG Hotline at the national level. • Responsible for the assignment of escalated complaints to the appropriate officers at the national level. • Responsible for overall reporting and tracking the performance of the C&G functions via the SAGEMIS. • Supports the SAGE Coordinator and SOO in following up on cases referred to the PSP. • Provides status updates on the resolution of complaints referred to the national level. • Responsible for Day-Day-to-day management of the C&G module and ensuring that its functional and accessible at all times. • Technical backstopping of the RTSU coordinators in preparing system-generated reports for submission to various stakeholders the DLG and PSP. • Coordinating the submission of district, city and municipal complaints status reports (DCR) and SMS feedback to complainants • Organising capacity building activities for PMU staff and DLG staff on the C&G mechanism

Institution	Actor	Roles/Mandates
	Senior Programme Officer -MIS	<ul style="list-style-type: none"> Ensuring the SAGEMIS is up and running for the C&G module to operate. Addressing any system technical glitches that affect the functionality and accessibility of the C&G module in the SAGEMIS.
	District Liaison Officers (DLOs)	<ul style="list-style-type: none"> Complaints Officer supporting the investigation and resolution of assigned complaints escalated from the regional technical support units.
RTSU	RTSU Coordinator	<ul style="list-style-type: none"> Overall Complaints Manager at the regional level. Responsible for sorting and categorising complaints for resolution at RTSU level and escalation to the national level. Responsible for assigning complaints for investigation and resolution to the RTSU team. Responsible for case closure at the regional level. Responsible for communications and referral of PSP-related cases that are resolvable locally to relevant regional offices /branches. Responsible for disseminating consolidated Responsible for disseminating consolidated feedback/reports on the status of complaints reported to the DLGs. Responsible for tracking performance and resolution status in the region via the SAGEMIS.
	Operations Officers	<ul style="list-style-type: none"> Act as the Complaints Officer for complaints assigned to him/her by the RTSU Coordinator. Responsible for entering complaints received or assigned in the into the SAGEMIS. Responsible for investigating and resolving complaints assigned. Responsible for consolidating and preparing the requisite DCRs and feedback for review by the RTSU Coordinator. Drafts communications for the RTSU Coordinator to PSP and DLGs on complaints and grievances submitted Responsible for ensuring timely submission of complaints reports by the SCDOs. Responsible for supporting the RTSU coordinator by providing facts to address any appeals submitted.
	Administration Officers	<ul style="list-style-type: none"> Act as the Complaints Officer for complaints assigned to him/her by the RTSU Coordinator.

Institution	Actor	Roles/Mandates
		<ul style="list-style-type: none"> Manages the toll-free hotline. Responsible for receiving complaints reports from the SCDO_SAGE. Responsible for entering complaints received or assigned in the into the SAGEMIS. Supports investigations of complaints assigned to him/her by the RTSU Coordinator. Drafts communications for the RTSU Coordinator to PSP and DLGs on complaints and grievances submitted Ensures that all hard copies of complaints reports submitted by the districts are appropriately filed.

Table 2 : District, City and Municipal Level Actors and Mandates

Institution	Actor	Roles
DLG	CAO	<ul style="list-style-type: none"> Overall responsibility for monitoring the C&G mechanism's implementation at the district, city and municipal level. Responsible for addressing complaints on unethical behaviour of SCG implementing staff in DLG structures.
	DCDO	<ul style="list-style-type: none"> Supports the CAO in overseeing the SCG C&G mechanism. Responsible for supervising the SCDO-SAGE's complaints management functions. Supports SCDO-SAGE in creating public awareness on the SCG programme and its complaints channels. Co-chair the SCG sub-county/ Division vetting committee
	SCDO-SAGE	<ul style="list-style-type: none"> Coordinates the submission of all complaint reports from the District, city and municipals to the RTSU Coordinator. Responsible for supervising and monitoring the performance of sub-county/ Division CDOs' C&G functions. Responsible for coordinating RTSUs' feedback to sub-county/ Division CDOs. Alternate co-chair of the SVC and responsible for planning vetting sessions. Responsible for distributing complaint management forms to sub-county/ Division CDOs. Responsible for raising the awareness of stakeholders about the programme's channels for lodging complaints.

Institution	Actor	Roles
	Chairperson OPC at Division/ Sub- county	<ul style="list-style-type: none"> • Chairing sub-county/ Division vetting committee
	Councillors OPC at Division/ Sub- county (M/F)	<ul style="list-style-type: none"> • Members of the sub-county/ Division vetting committee
	Gombolola Intelligence Security Officer (GISO)	<ul style="list-style-type: none"> • Member of the sub-county/ Division vetting committee
	Sub-county/ Division CDOs	<ul style="list-style-type: none"> • Coordinating the management of C&G processes at the sub-county/ Division level. • Responsible for collecting and reviewing the completeness of all complaint reports from Parish chief/ town agents. • Responsible for transmitting all district, city and municipal-level complaint reports to the SCDO-SAGE. • Responsible for coordinating SCDO-SAGE to the Parish chief/ town agents. • Responsible for distributing complaint management forms to Parish chief/ town agents. • Acts as alternative channel for receiving complaints from beneficiaries and stakeholders. • Responsible for raising public awareness about the programme's channels for complaint reporting. • A member of the SVC and responsible for organising sub-county/ Division vetting sessions.
	Parish chief/ town agent	<ul style="list-style-type: none"> • First point for lodging complaints by beneficiaries and other stakeholders. • Responsible for conducting admissibility checks to ensure that complaints received are relevant to the SCG programme. • Responsible for submitting all completed forms to the sub-county/ Division CDO. • Responsible for mobilising complainants for reviews of their complaints and for the vetting sessions

Institution	Actor	Roles
		<ul style="list-style-type: none"> • Responsible for providing information and feedback to the beneficiaries and other stakeholders. • Supports public awareness about the programme's channels for reporting complaints.
	Beneficiaries/ Stakeholders	<ul style="list-style-type: none"> • Responsible for reporting their complaints to the Parish chief/ town agent, or through the alternative channels available. • Have a right to appeal any decision of programme. • Have a right to obtain information about the any aspects of the SCG programme from any duty bearer.

3.1 COLLABORATION WITH INDEPENDENT MANDATED INSTITUTIONS.

SCG beneficiaries and other stakeholders shall be encouraged to report all their complaints and grievances through the established systems and the programme will strive to address them in the best interest the parties involved. However, there are circumstances where complaints may be reported or referred to legally established entities mandated to handle complaints such as:

- i) **The National Council for Older Persons (NCOP),**
- ii) **The Equal Opportunities Commission (EOC),**
- iii) **The Inspectorate of Government (IG),**
- iv) **The Uganda Police and**
- v) **The Office of the Resident District/City Commissioner (RDC/RCC).**

These circumstances include:

- Beneficiaries or stakeholders submit a complaint or appeal against a programme decision
- The programme refers complaints to specific institutions for further management based on their mandate for example; fraud and corruption to Uganda Police or the inspectorate of Government.

In both circumstances, the programme will be responsive, cooperate in the investigations, and respect the outcome.

3.2 CONSEQUENCES OF C&GS TO SCG DUTY BEARERS AND PSPs

Addressing complaints and grievances in the SCG is both a rights and accountability issue. Complaints Management is a very important function for all responsible duty bearers and payment service providers. In the discharge of their duties in the SCG programme, the government staff (including programme staff) are guided by the Public Service Standing Orders. The payment service provider on the other hand is obligated under the contract signed with the MGLSD to establish a functional C&G system to be used by beneficiaries and other stakeholders.

Therefore, there are consequences that shall be faced by for the various duty bearers and payment service provider in case they have any deliberate direct responsibility to some of the complaints and grievances.

These consequences include but are not limited to;

a) **Government Staff.**

All government and programme staff who will be reported or findings from investigation show direct responsibility to causing or aiding complaints in the SCG programme will be sanctioned under Uganda Public Service standing orders and other regulation.

b) **Payment Service Provider.**

Payment service contractors that do not meet the terms and conditions stipulated in their contract for C&G shall have one or more of the following consequences; issued warning letters, penalties charged, contract reviewed and contract terminated

CHAPTER 4: MODES AND CHANNELS FOR LODGING A COMPLAINT OR GRIEVANCE

4.1 CHANNELS AND MODES

Effective reporting channels are essential for ensuring that complaints and grievances are received, heard, addressed, and resolved promptly and fairly. The complaints and grievances reporting in the SCG shall be enabled by the SCG Complaint form and the toll-free hotline. Complainants are free to choose the mode and channel that is best suited to their needs. The channels and modes are;

- Through the programme duty bearers by submitting a written complaint using the SCG complaint form, and
- Through the programme offices by submitting an oral complaint using the toll-free Hotline.

4.1.1 Channel 1: the SCG complaint form

This is the primary channel for submitting a complaint using the SCG Complaint Form (*See Annex 1*). The form is submitted through the parish chief/ town agent, who serve as the custodian of the forms and designated as a complaint's receiver. Parish chief/ town agents are responsible for receiving and supporting the recording of all complaints reported by beneficiaries or their representatives, both during and outside of paydays. In addition, individuals can also use the secondary channels by submitting their complaints through the Sub-county/ Division CDOs or RTSU Operations/Administration Officers.

Box 3 : Features of the SCG Form

All SCG complaints form (paper-based) is submitted to the Regional Technical Support Unit.

The SCG complaints form will be divided into two sections;

- Main section where complaint details are recorded,
- The tear-off receipt – smaller section at bottom of each form.

Each form will feature a unique serial number appearing on both the main section and the tear-off receipt. Complainants will retain the tear-off, allowing them, or any stakeholder, to track the status of their complaint using the serial number.

This number will also be referenced in feedback to the district/ city /municipal report and SMS to the beneficiaries. However, in the long term, the plan is to digitise the SCG form to enable electronic capture of complaints.

At the designated pay points, complaint forms will be accessible at the complaints desk or with any designated Officer as specified. SCG beneficiaries or their representatives will be assisted by

the receiving officer in recording their complaint who should review the form together with the complainant to ensure that what has been recorded is accurate and represents their intent. If a complainant prefers not to lodge their complaint with the Parish chief/ town agent, he/she may alternatively submit it through the Sub-county/ Division Community Development Officer (S-CDO) or with an operations/Administration officer of the RTSU.

4.1.2 Channel 2: Toll-free hotline (Oral complaints using the SCG Form).

The programme shall operate toll-free complaint hotlines with the complaint's receivers being the administration officers at the regional level and the SPO C&G at the PMU HQ. An SCG Complaints Form booklet will be maintained at each location.

The receiver of the complaint will tick the hotline option as the channel for reporting on the SCG complaints form. The information recorded in the SCG Complaints Form will be entered into the C&G module of the SAGEMIS.

Box 4 : The C&G Module in the SAGEMIS

The C&G Module in the SAGEMIS is vital for automating the complaints management process. The automation enables efficient complaint capture, assignment, tracking, escalation, feedback and closure.

As per the respective Standard Operating Procedures (SOPs), all complaints lodged through the SCG complaints form and SCG hotlines will be entered into the SAGEMIS using the C&G Module.

The SOPs are found in **Chapter 9** of this guidelines. For all complaints, the C&G module will allow the complaints officer to enter text comments describing actions taken, the status of the complaint at each stage and the final outcome.

Each complaint receiving officer will also have access to the Complaints and Grievances (C&G) module in the SAGEMIS to review the status of existing cases. The Complaints Hotline will be widely publicised and available initially only in English with a possibility of expanding to local languages in the future.

CHAPTER 5: COMMUNICATION APPROACH

Communication is a vital tool for the SCG C&G mechanism and this cuts across all the implementation steps of the programme. The programme shall provide information to stakeholders through multiple channels to augment the SCG C&G Mechanism. Communication for C&G shall address two key purposes;

- a) To raise awareness about programme services;
- b) To enhance timely feedback to complainants.

5.1 ENHANCE AWARENESS ABOUT PROGRAMME SERVICES

Effective communication plays a central role in mitigating and reducing the volume of the C&Gs in the SCG programme. The emphasis of communication in the SCG shall be to provide information on where, when, where, and how to access the programme services.

Below is a non-exhaustive list of questions relevant in the C&G management that shall to be addressed in the SCG communication;

- i. Who is eligible for SCG?
- ii. What is the cost of accessing SCG services?
- iii. Where can one be registered?
- iv. When does registration take place?
- v. What is required for registration?
- vi. Who is responsible for registration?
- vii. Who is responsible for payments?
- viii. When are beneficiaries paid?
- ix. How do beneficiaries know they have been paid?
- x. Where will beneficiaries get their payment?
- xi. What does one need to have to get paid?
- xii. Who is responsible for addressing complaints?
- xiii. How long does it take to get feedback?
- xiv. What rights and responsibilities does a beneficiary have?

5.2 ENHANCE TIMELY FEEDBACK TO COMPLAINANTS

The programme shall prioritize providing timely feedback to complainants through the District/ city /municipal complaints report and SMS Alerts.

5.2.1 District/ city /municipal Complaints Report (DCR)

The District/ city /municipal Complaints Report (DCR) shall be used by sub-county/ Division CDOs and Parish chief/ town agents for providing feedback to complainants especially during paydays. In every quarter or before any round of payments, whichever comes first, the programme will provide a district/ city /municipal complaints status report for all complaints that have not yet been closed.

5.2.2 SMS Alerts

The programme will use the SMS notifications to acknowledge receipt or notify a complainant about the resolution of their complaint

CHAPTER 6: CATEGORISATION OF COMPLAINTS & GRIEVANCES

Complaints and grievances in the SCG Programme are categorized into five groups namely; program service complaints, payment service complaints, other complaints, grievances and appeals. Some complaints may be inadmissible hence the receiving officer should conduct an admissibility check before recording the complaint. However, care must be taken not to conceal acts of duty bearers that infringe on the rights of beneficiaries, or form some part of intentional abuse that MUST be reported as grievances (See section,6.4).

Box 5 : Admissibility Check

Before a complaint is recorded, the responsible officer should conduct an admissibility check. A complaint is considered admissible if the allegations relate to a decision, action, or omission in the SCG Programme.

If a complaint is not about the SCG then it's not inadmissible. Complainants should be informed of the reason for inadmissibility and provided with suggestions as to whom they may address their concerns, if applicable.

The section below elaborates on the five categories of complaints and grievances in the SCG programme.

6.1 PROGRAMME SERVICE COMPLAINTS

A programme service complaint is an expression of dissatisfaction (by an SCG beneficiary or his/her representative) with an action, inaction, or omission of a duty bearer that impacts their satisfaction with the programme services. A programme service complaint mainly relates to persons that are already enrolled in the SCG. These complaints are caused by concerns on three key parameters: access, timeliness, and quality of services.

These complaints shall be formally reported and will go through established procedures (SOPs) to ensure they are resolved appropriately.

The SCG programme services complaints include;

1. Name Missing on Current Payroll
2. Alternate Recipient (AR) Details Not with PSP for Enrolment
3. Next Alternate Recipient (AR) or Next of Kin (NoK) not paid
4. Dead Beneficiary on Current Payroll.
5. No Money / Less Money on Account

6.2 PAYMENT SERVICE COMPLAINTS

Payment Service Complaints related to concerns with the standard of services expected or delivered by the payment service provider. Payment services complaints refer to dissatisfactions arising from either the absence of services or delayed action by the PSP in resolving a previously lodged complaint. The PSP shall commit as per its contract and SLA to establish a robust complaints management system for the SCG programme.

To avoid overwhelming the programme implementation structures and to enhance accountability, all payment service complaints should initially be directed to the PSP's own complaints process. The PSP is obligated to establish a complaints desk at all its channels and ensure timely resolution of complaints within the minimum standards agreed.

However, where the PSP fails to provide adequate or timely resolution of complaints they received (within the SLA) or the complaints reporting service is not accessible, beneficiaries/stakeholders can submit complaints directly to the programme through the Parish chief/ town agent using the SCG Complaints Form or the toll-free hotline.

There are two categories of payment service complaints;

1. Delayed Resolution of Complaints	2. Exclusion /Absence of Services
1.1 No money on account	2.1 No complaints desk at pay points
1.2 Less balance on account	2.2 No complaints desk (other service points)
1.3 Unauthorized withdrawal	2.3 Not Paid due to network challenges
1.4 Next of Kin (NoK) not paid	2.4 Not Paid due to liquidity challenges
1.5 Alternative Recipient (AR) not enrolled	2.5 Absence of enrolment services
1.6 AR or NOK not with PSP	2.6 Unfair exclusion from other bank services

6.3 OTHER COMPLAINTS

Other complaints under the SCG programme shall include;

- (a) Non-SCG related complaints
- (b) Anonymous complaints

6.3.1 Non-SCG related Complaints

Complaints that fall under the category of "others" relate to concerns that are non-SCG related. Sometimes a complaints system can be overwhelmed with a lot of complaints that do not relate to the SCG programme or very minor issues that are resolvable on the spot. Therefore, not all

complaints are a concern of the programme and hence should not be recorded. Such complaints usually arise from;

- a) The lack of information on a programme process which may be simply resolved by providing additional information.
- b) Inconsequential conduct of programme duty bearers or PSP staff — misdemeanors that are not serious enough to warrant formal investigation e.g. being unhelpful, not being well dressed, inappropriate behavior, being inattentive or obstructive.

In such cases, the complaints receiving officer should use various strategies and approaches to address the concern of the complainant. These strategies include;

- a) Acknowledging to the complainant that the complaint is understood, that the situation should not have arisen, and that there is a commitment to have it addressed.
- b) Providing an explanation and/ or further information resolving the misunderstanding or apologizing on behalf of the programme staff member who is the subject of the complaint.
- c) Referring the complainant to the most competent office to handle the complaint (this is if the responsible officer is privy to such information).

However, good practice in C&G management requires that even when a complaint is not flagged for investigation, the receiving Officer must keep a record of it and include it in his/her regular progress reporting. This is necessary to facilitate lessons learnt in the implementation of the C&G mechanism and designing strategies to address them. For example, If the frequency of occurrence of a certain type of complaint is high, management have to take interest in understanding the root cause and provide solutions.

6.3.2 Anonymous Complaints

Although it's in the interest of the programme to have all complainants identify themselves, some individuals may choose to remain anonymous. This right to privacy should be respected yet the complaint may reveal very critical issues about the programme. Anonymous complaints are therefore those concerns lodged by individuals who prefer not to provide their names or contact details.

The Complaints Officers will address any anonymous SCG related complaint administratively using the following basic steps.

- i) Acknowledge and record the complaint on the SCG complaints form and check the box of anonymous
- ii) Anonymous complaints shall be reviewed, investigated and resolved by either the RTSU coordinator or SPO C&G who are the complaints Officers. The Complaints

Officers shall determine if the complaint warrants an investigation, focus on the facts, interview any parties involved and decide if it's resolvable at that level or not.

- iii) RSTU Coordinators and the SPO C&G shall make reports on all anonymous complaints to the SAGE Coordinator. The SAGE Coordinator will be responsible for any other escalations that may be required.
- iv) Although feedback will not be provided to specific individuals, the SAGE coordinator shall use the findings in the anonymous reports to establish measures aimed at reducing the future occurrence of such concerns.

2.7 GRIEVANCES

The SAGE Guidelines (2019) define a grievance as a situation where there has been a violation of a beneficiary's rights under the programme. The definition includes serious concerns and allegations against any duty bearer (PSP &Programme) in the programme regarding extreme cases such as fraud, mistreatment of beneficiaries, or corruption.

Grievances are usually in the form of allegations but if substantiated could require formal management action against the perpetrators. Anyone who receives a complaint about a duty bearer meets the criteria of a grievance must refer the case to either the Parish chief/ town agent or the Sub-county/ Division CDO. Alternatively, the grievance can be channeled through the SCG Toll-Free Hotline.

Grievances under the programme will have the following categories;

1. Fraud or corruption (includes charging of illegal fees for SCG services)
2. Eligible Person but Not on the Provisional Beneficiary List (targeted).
3. Exclusion or Inclusion in SCG due to ID error
4. Delayed Programme services.
5. Abuse of a beneficiary

6.5 APPEALS

These entail concerns about the correctness of decisions made by the programme. An appeal therefore refers to an expression of dissatisfaction with the outcome of a prior complaint about a programme service/benefit, or the manner in which it was resolved.

Under the SCG, an individual has a right to appeal against any decision of the programme, payment service, or outcome of a complaint process.

There are mainly two types of appeals;

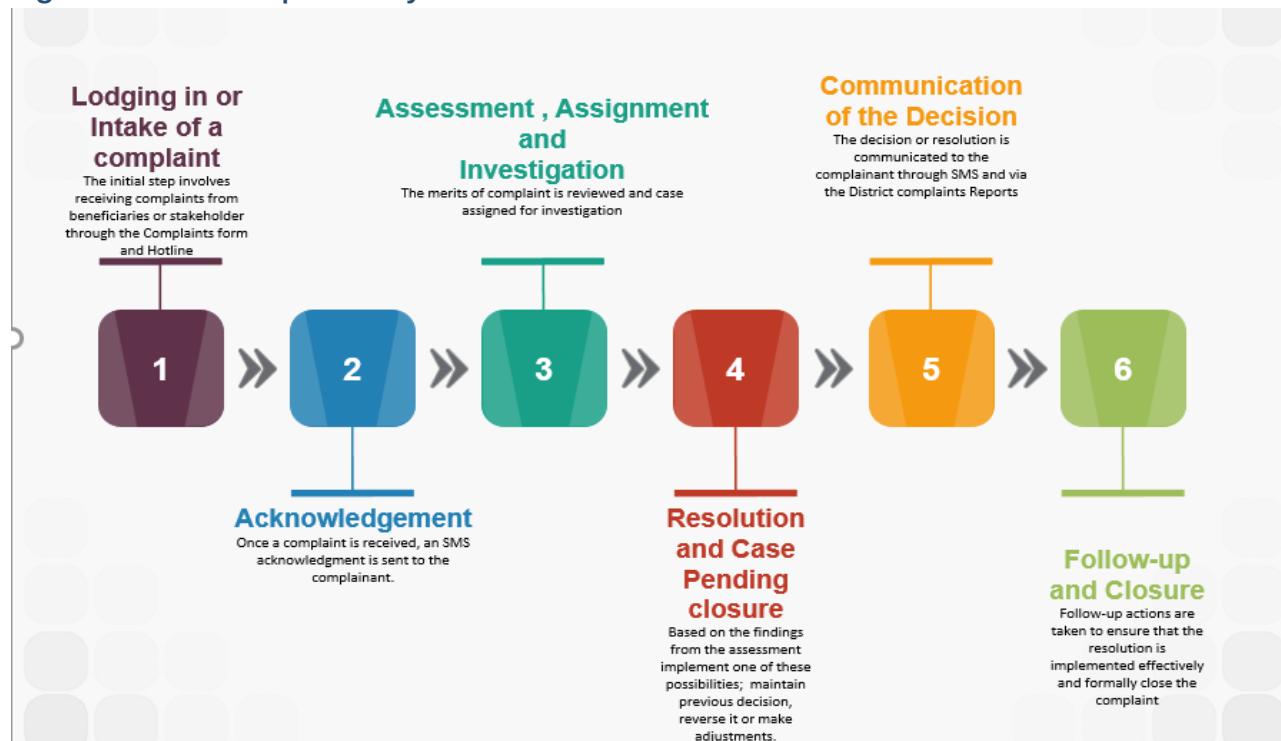
- a) Dissatisfaction with the decision on a complaint or grievance previously lodged.
- b) Unfair exclusion on the basis of the incorrect date of birth on their National ID.

CHAPTER 7: COMPLAINTS HANDLING PROCESS

7.1 PROCESS FLOW

The SCG complaints mechanism will typically have six main steps. These steps start with reporting points where complaints are lodged and then move along the chain up to when feedback is provided to the complainant before its closed. This process flow emphasizes the central role of communication in effective complaints management.

Figure 1. SCG Complaints Cycle



A typical SCG C&G management cycle goes through the stages summarized below.

STEP 1: LODGING OR INTAKE OF A COMPLAINT

The first step is reporting the complaint to the Parish chief/ town agent, who is the primary/frontline complaints receiving officer and the first point of contact for lodging a complaint. Parish chief/ town agents manage the complaints forms and are responsible for recording all complaints lodged by individuals.

Some Complaints can be resolved by Parish chief/ town agents at this point for example those under “other complaints” category. Those that the Parish chief/ town agent cannot resolve are processed for on-ward referral higher up the C&G handling chain. For cases that are to be

referred onwards, the complainant is given a tear off for follow up purposes. Anyone responsible for receiving a complaint must maintain very high standards of professionalism even in cases where some complainants may exhibit ill-mannered behavior.

Box 6 : Dealing with Improper behavior of some complainants

Some complainants may engage in abusive or unreasonable behaviour at the point of lodging their complaint and this may constrain their access to the complaint mechanism. Receivers of SCG complaints must record all valid complaints so that they are investigated while remaining calm so as to minimize disruption. However, any threatening behaviour on the receiving officer should be reported to the local leaders in the area in extreme cases.

Therefore, transparency is essential while informing complainants of unacceptable actions and consequences. However, it's important to ensure sensitivity for those with mental health issues or disabilities so that they are not unfairly treated.

Once the complaints forms have been completed in duplicate, the Parish chief/ town agent records them in his/her Document Transmission Register (DTR) then submits them to the sub-county/ Division CDO, who signs for them to acknowledge receipt and reviews all reports of his/her sub-county/ Division. He/she records them in the DTR, resolves those they can resolve and transmits the ones they cannot resolve to the Senior CDO in charge of SAGE (SCDO-SAGE) at the district/ city /municipal level.

The SCDO SAGE sign of the Sub-county/ Division CDOs DTR to acknowledge receipt, reviews all reports from the various sub-county/ Division CDOs in the district/ city /municipal, resolve the ones they can resolve and sends the ones they cannot to the Coordinator, Regional Technical Support Unit. The Coordinator will sign the STR of the SCDO-SAGE to acknowledge receipt of the reports and proceeds to record the details in the DTR.

Box 7 : Reviewing Complaints forms

At all levels, either when reviewing complaints forms received or during investigation, the responsible officers/duty bearers shall undertake the following checks;

- Completeness Check: are all the relevant fields completed?
- Relevance Check: is the complaint reported relevant for the SCG programme?
- Resolution Check: For complaints already resolved at a lower level, was the action taken appropriate? If not, then set aside the decision and take appropriate action
- Clarity Check: is the information on the form legible/readable?

Lastly, to save time, in case additional information or clarification is required, the reviewing officer shall use the contact provided on the form to contact the complainant.

Alternatively, complaints can be lodged through the SCG Toll Free Hotline. The receiving officer will resolve those he/she can resolve and for those they cannot will be recorded in the SCG Complaints and Grievances for further Management.

STEP 2: ACKNOWLEDGEMENT

All complaints reports submitted to the RTSU will be received by Operations Officers and information recorded in the RTSU Complaints Register (RCR). At the regional office, the RTSU Operations Officer shall be responsible for reviewing, and entering all the complaints from the district/ city /municipals and those from the Hotline in the SAGEMIS.

Once the complaints have been entered into the SAGE MIS, an automated acknowledgement SMS is sent to the complainant. This step ensures that the complainant knows that his/her complaint has been recorded by the programme and will be addressed.

STEP 3: ASSESSMENT, ASSIGNMENT AND INVESTIGATION

Once complaints are in the SAGEMIS, the RTSU Coordinator (in some cases in consultation with the team) will take responsibility for sorting them by resolution location and assigning them to Operations Officers and or Administration Officers (Complaints Officer) for investigation and resolution.

Complaints that cannot be resolved locally are escalated in the system for the attention of the Senior Programme Officer, Complaints and Grievances (SPO-C&G), who is based at the programme headquarters in Kampala. The SPO-C&G is responsible for assigning and following up on the resolution of **all** such complaints.

STEP 4: RESOLUTION

Based on the findings by the respective complaint's officers, the necessary actions will be taken by the relevant duty bearers mandated by the programme. Complaints resolutions will either require changes in the beneficiary information in the SAGEMIS or administrative and not require any changes on SAGE MIS. Where changes in the SAGEMIS will be required, the Operations Officers at the RTSU or SPO C&G shall have the mandate to initiate and the Senior Operations Officer (SOO) or RTSU Coordinator authorizes.

Resolving complaints will include one of the following decisions:

- Maintaining the programme decision/action- the complaint was not valid
- Reversing the decision/action that caused the complaint- the complaint was valid
- Correcting administrative errors, and
- Any other appropriate action.

All complaints resolutions in the SAGEMIS shall be approved by the SOO or RTSU Coordinator. If a case is still under investigation, then it will be marked in the SAGEMIS as "Investigation"

STEP 5: COMMUNICATION OF THE DECISION

Once resolution of a complaint is approved in the SAGEMIS, a system generated SMS notification will be sent to the complainant. The SMS will be complimented by specific district/ city /municipal complaints reports (DCR) on the status of all complaints reported in the period. DCR's shall be prepared by the RTSU operations Officers shared by the SCDO-SAGE and District/ city /municipal SP Platforms.

These reports will specifically be important to sub-county/ Division CDOs and parish chief/ town agents in providing feedback to the complainants.

STEP 6: FOLLOW-UPS AND FORMAL CLOSURE.

Formal closure of the cases be done when all actions recommended in **Step 4** have been taken. At this point then, the SAGEMIS is updated accordingly. At the field level, Complainants shall be informed of their right to appeal in case they are not satisfied with the out-come of the resolution.

7.2 STANDARD RESOLUTION TIMELINES FOR SCG COMPLAINTS.

The different categories of complaints in the SCG shall require different timelines for investigation and resolution given the uniqueness in their nature and complexity. Acknowledgement of a complaint by sending an SMS to the registered contact shall be within 10 working days of receipt of the complaint at the RTSU.

However, the programme shall follow a standard schedule in the resolution of the various complaints as given below;

- a) Resolution of all Programme complaints shall be within 24 working days of receipt of the complaint (when reported by the complainant).
- b) Resolution of all Payment complaints, Grievances and Appeals shall be within 30 working days of receipt of the complaint (when reported by the complainant)

CHAPTER 8: PATHWAYS OF COMPLAINTS REPORTING

As noted earlier in Chapter 5, Complaints in the SCG will be lodged through two main channels; (a) a complaints form, or (b) using the toll-free hotline.

8.1 USING THE SCG COMPLAINTS & GRIEVANCE FORM

STEP 1: Beneficiary directly lodges a Complaint with the Parish Chief/ Town Agent or Sub-County/ Division CDO

- 2.1. Beneficiaries have the right to raise complaints about any aspects of SCG services.
- 2.2. The first point of contact for beneficiaries raising a complaint is the Parish chief/ town agent or the Sub-county/ Division CDO at the payment point on a payday. Complaints can also be reported on non-pay days. The Parish chief/ town agent/S-CDO must conduct him/herself professionally to ensure that the complainant feels comfortable to air their concern and provide all the information required for accurate recording to support the successful resolution of the complaint.
- 2.3. The Parish chief/ town agent/ S-CDO shall assess the admissibility of the complaint whether it's relevant to the SCG programme, or only requires clarification/information. If it's not admissible then the complainant should be provided with additional information, clarifications or referred an appropriate and competent authority. Such complaints should not be recorded in the complaints form. For admissible complaints, the parish should go ahead and support the recording.
- 2.4. The Parish chief/ town agent or the sub-county/ Division CDO records the complaint details including information about the beneficiary in the SCG complaints form (Printed in duplicate) with a unique serial number before attempting to resolve the issue or complaint. The complainant is given a tear-off from the original copy. The duplicate remains with the Parish chief/ town agent and the original is submitted to the sub-county/ Division CDO.
- 2.5. If the Parish chief/ town agent /S-CDO is able to resolve any complaint, feedback should be provided to the complainant immediately and the action updated on the SCG complaints form.

- 2.6. The Parish chief/ town agent/S-CDO shall register all complaints in the Document Transmission Register- DTR (Annex 2) then escalate the unresolved complaints to the Sub-county/ Division CDO.

Note: For all Complaints, whether resolved or not, all SCG complaints forms must be transmitted to the next level

Step 2: Pathways for Complaints escalated to The Sub-County/ Division CDO by the Parish Chief/ Town Agent

- 2.1. The Parish chief/town agent shall submit original copies of all the filled SCG complaints forms to the Sub-county/ Division CDO who will sign to acknowledge receipt on the Parish chief/ town agent's DTR (Document Transmission Register).
- 2.2. Once the Sub-county/Division CDO has received the complaints, He/she will review them and for cases that can be resolved at the sub-county/ Division level, undertake the necessary investigations.
- 2.3. If the Sub-county/Division CDO is able to resolve the complaint at the sub-county/ Division level, s/he will update the Parish chief/ town agent of the resolution through phone call or call the beneficiary directly on the contact provided on the form. In addition, at the next opportunity or pay date, the Parish chief/ town agent shall inform the beneficiary of the resolution of the complaint in person. The details of the resolution will also be contained in the District/city /municipal Complaints Reports.
- 2.4. If the Sub-county/ Division CDO is unable to find a resolution to a given case, those complaints forms are registered in the DTR and escalated to the Senior CDO SAGE at district/ city /municipal level.

STEP 3: Pathways for Complaints escalated to the SCDO-SAGE from the Sub-County/ Division CDO

- 3.1. The Sub-county/ Division CDO shall submit the original copies of all the SCG complaints forms to the SAGE SCDO who will sign to acknowledge receipt on the S-CDO's DTR.
- 3.2. Once the SAGE SCDO has received the complaint(s), s/he shall undertake a thorough review of the complaint (s) that have been escalated using the SAGEMIS

and review the one's resolved at the Sub-county/ Division level to ensure they were adequately addressed.

- 3.3. If the SAGE SCDO is able to resolve some of the complaints at the district/city /municipal level, an update on the form and the Sub-county/ Division CDO responsible for the case shall be informed.
- 3.4. Thereafter, the SAGE CDO shall communicate verbally during routine meetings or make a phone call on cases resolved to the Parish chief/Town agent. Upon the next opportunity or pay date, the Parish chief/ town agent shall inform the respective beneficiaries of the resolution of the complaints in person. The details of the resolution will also be contained in the District/ city /municipal Complaints Reports.
- 3.5. If the SAGE SCDO is unable to find a resolution to a given case or cases, those complaints are escalated to the RTSU Coordinator.
- 3.6. The SAGE SCDO shall record all the complaints in his/her DTR and submit to the RTSU Coordinator. The RTSU Coordinator shall acknowledge receipt by signing the SAGE Senior CDO's DTR.

Step 4: Pathways for Complaints escalated to the RTSU Coordinators from the SCDO-SAGE

- 4.1. Once the RTSU Coordinator has received the complaint(s) from the SCDO-SAGE, s/he shall have them recorded in the "RTSU Complaints Register (RCR)" (**Annex 3**) by an officer at the region Alternatively, the complaints forms can be scanned and emailed to the respective RTSU Coordinators. The RTSU Administration Officers should maintain a filing system for all the hardcopies of complaints submitted.
- 4.2. The RTSU coordinator will delegate an officer to review all the complaints submitted by the SCDO-SAGE and group them into two; (a) resolvable at the RTSU, and (b) to be escalated to the SPO C&G. They are then assigned to an RTSU staff for entry into the SAGEMIS.
- 4.3. The Officer will enter the details of all the complaints into the SAGEMIS. An auto SMS is generated and submitted to the registered complainant's number to acknowledge receipt of the complaint. For example, "***Your complaint number 'xxx' has been received. It will be resolved within 30 or 45 days.***"

- 4.4. Once data entry is complete, for those complaints identified as resolvable at the RTSU, the RTSU Coordinator assigns them within the MIS to RTSU staff as responsible complaints officers to undertake thorough investigations. The others are escalated to the SPO C&G for further management.
- 4.5. If the complaint is successfully resolved at the RTSU level, then the Operations Officer will update the SAGEMIS accordingly and close the case in the system. An auto-generated SMS will be sent to the complainants' phones to update them about the resolution "***Your complaint number 'xxx' has been resolved, contact your Parish chief/ town agent or CDO for more information***".
- 4.6. Additionally, every 30th day of the last month of the quarter, a District/ city /municipal Complaints Report (Annex 4) on updates for ALL the complaints resolved at all levels within the quarter and under investigation will be sent to the respective SAGE SCDO at district/ city /municipal level. The SAGE SCDO will communicate /share with the Sub-county/ Division CDO, who will in turn inform /share with the responsible Parish chief/ town agents to communicate feedback to the complainants.

The DCR (District Complaints Report) can be shared using various social media platforms such as District/ city /municipal SP WhatsApp groups while maintaining confidentiality and privacy of the complainant.

Step 5: Pathway for Complaints escalated from the RTSU Coordinators to the SPO Complaints and Grievances Management at PMU

- 5.1. If the RTSU cannot resolve a complaint (all payment services complaints) or has undertaken an investigation but is unable to find a resolution to certain cases, those complaints are escalated to the Senior Programme Officer, Complaints and Grievances at the PMU.
- 5.1 The SPO C&G will review and assign the programme complaints to the respective District Liaison Officers (DLOs) as complaints Officers at the PMU HQ and for payment services complaints forwards them to the responsible complaints handling officer of the PSP.
- 5.2 The SPO C&G will follow up all programme and payment services complaints being handled at the PMU HQ to ensure timely feedback. Feedback from the programme and PSP will be updated on the SAGEMIS and the case closure in the system approved by SOO. An auto-generated SMS will be sent to the

complainants' phones to update them about the resolution; "*Your complaint with reference number 1234 has been resolved, contact your Parish chief/ town agent or Sub-county/ Division CDO for more information.*"

5.3 **Additionally**, the resolution status of all complaints will be updated in the DCR

8.2 USING THE SCG TOLL-FREE COMPLAINTS HOTLINE

8.2.1 A beneficiary/stakeholder may choose to use the toll-free hotline to report a complaint or grievance. In this case, they will call any lines of the hotline provided, preferably the one that is listed for the region where their district is located.

8.2.2 The programme staff shall answer the phone promptly (within the third ring), confirm to the caller they have called the SCG hotline, Greet the caller, give your names and ask if they need help or if they have a complaint to lodge.

8.2.3 If the caller confirms they have a complaint to register then ask them to have one or more of the following information with them; Account Number of the beneficiary, NIN of the beneficiary or a reference number in case they are following up on a complaint lodged previously and a phone number to be called in case of feedback. In addition, ask them to have a pen and paper where to write a number you will provide when they are following up the case. **Consider enhancements: Requirements for the caller to have should be embedded in the caller tune, and also the caller to be able to select the region where they were registered (if SCG beneficiary) or language.**

8.2.4 The receiving officer will take them through and record the complaint using the HOT LINE Complaints Form. The receiving officer will provide the complainant with the reference number of the form for follow up purposes. In addition, the receiving officer will inform the complainant on the expected timeframe for getting a feedback detailed under section 7.2.

S/he then enters the complaint in the SAGEMIS clearly marking the source (hotline). An auto SMS is generated to acknowledge receipt will be sent to the complaint's registered number. For example; "***Your complaint number 'xxx' has been received, it will be resolved within 30 days.***"

8.2.5 The SPO C&G will review all the complaints in the SAGEMIS, group them into;

- resolvable at the RTSU;
- Referred to the District/ city /municipal and

(c) Escalated to the SPO C&G.

The officer will then assign in the SAGE MIS the locally resolvable complaints to the respective Complaints Officers for investigation and resolution. Others are referred back to the district/ city /municipal through the DCR or escalated to the SPO C&G for further management.

- 8.2.6 If the complaint is successfully resolved at the call centre, it will be updated the SAGEMIS accordingly and closed in the system. An auto-generated SMS will be sent to the complainants' registered phone number to update them about the resolution. For example; "*Your complaint number 'xxx' has been resolved, contact your Parish chief/ town agent or Sub-county/Division CDO for more information.*"
- 8.2.7 Additionally, every 30th day of the last month of the quarter, a District/city /municipal Complaints Report will contain the resolution status of ALL complaints reported through the hotline within the quarter and this will be sent to the respective SAGE SCDO at district/ city /municipal level.

CHAPTER 9: STANDARD OPERATING PROCEDURES

The purpose of this section is to provide a clear and structured procedures (Standard operating procedures) for managing the different types of complaints and grievances. Standard Operating Procedures (SOPs) for C&G are a set of guidelines that aim to achieve uniformity in the procedures for handling various complaints and grievances in the programme.

These procedures entail the aspects of; reporting, investigation and closure. These SOPs are intended to emphasize an important norm in effective complaints and Grievance management that the process is as important as the outcome.

Box 8: In Complaints Management the Process is Important as the Outcome

When implementing the SCG complaints mechanism, focus shall be on both the process and outcome. Any officer handling a complaint shall ensure that complainants feel heard, respected, and taken seriously.

Complainants shall receive necessary support and be informed about the process, progress, and outcome. Complaints officers shall address concerns efficiently and take appropriate actions. In addition, these officers shall provide clear communication about the process and its limitations so as to manage expectations and ensure that complainants feel that their issues have been handled fairly, even in difficult situations.

In doing this, complainants' satisfaction with the system will be enhanced and this shall contribute to effective resolution.

The SOP for each complaint or grievance provides a step-by-step process to guide implementers. Each SOP includes; The category of each complaint, an operational definition of the complaint or Grievance, standard resolution time, where it should be reported, the risk it poses, identification of probable causes, investigation, resolution steps, closure and the feedback.

9.1 STANDARD OPERATING PROCEDURES FOR PROGRAMME SERVICES COMPLAINTS

9.1.1. SOP: Name Missing on Current Payroll

Definition	A beneficiary who was on the payroll but got deleted /suspended and no longer receives the grant.
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Reporting of Complaint	These complaints can be registered with the Parish chief/ town agent, ward administrators, Sub-county/ Division CDO or through the toll-free hotline.	
Resolution Level	Regional Level - RTSU	Standard Resolution Period is 30 Days
Level of Risk	HIGH	Ineligible persons reinstated in the payroll (inclusion error) or eligible persons excluded (exclusion error).
Possible cause (s)	<p>Scenario 1: Wrongly reported Dead</p> <p>Scenario 2: Wrongly reported/marked as Under-aged</p> <p>Scenario 3: Wrongly reported as Pensioner</p>	
Investigation	<p>Basic Step: Using the NIN, the complaint officer checks on the reasons for deactivation or suspension in the SAGEMIS.</p> <p>For Scenario 1: Does the SAGEMIS have a death report tagged to the beneficiary records or was the beneficiary suspended administratively?</p> <p>For Scenario 2: Is there a verification report tagged to the beneficiary SAGEMIS records declaring him/her under aged?</p> <p>For Scenario 3: Does the beneficiary appear on the pensioners list?</p>	
Resolution Options/Steps	<p>Option 1: Scenario 1-2-3: If No death report was submitted or reported Administratively and No pension record exists in the SAGEMIS, then</p> <ol style="list-style-type: none"> 1. Complaint Officer should complete for <u>immediate resolution</u> the “SCG Reinstatement Form” (Annex 5) and enter request for reinstatement in the SAGEMIS. 2. The RTSU coordinator approves reinstatement change in the SAGEMIS and then close the case. 3. This decision should be communicated in the district/ city /municipal report and SMS to the beneficiary. <p>Option 2: Scenario 1-2-3: If death report, verification report, or pension record exists in the SAGEMIS then,</p> <ul style="list-style-type: none"> • Provide details in the DCR and request the S-CDO/SCDO-SAGE to review the complaint and “SCG Reinstatement Form” 	
Closure &Feedback	<ol style="list-style-type: none"> 1. The Complaints Officer at RTSU enters the reinstatement information in the SAGEMIS, RTSU Coordinator approves and SOO authorises reinstatement for Successful Complaints. 2. The Feedback is three-fold; 	

	<p>a) Resolution status in the DCR (District complaints report) is recorded as “approved” for successful complaints and “rejected” for unsuccessful complaints.</p> <p>b) Any form of feedback to the complainant either through a phone call, verbally or otherwise shall be recorded in the SAGEMIS.</p> <p>c) An “SMS” will be sent to the respective complainants for example: SAGE: Your complaint number ‘xxx’ has been approved (successful complaints) /Rejected (unsuccessful complaints), contact your parish chief/ town agent/ward administrator or sub-county/ Division CDO for details”</p> <p>3. The above communication shall be reinforced to the complainant by the parish chief/ town agent or sub-county/ Division CDO at the earliest opportunity or on the pay day using the information that has been shared in the DCR.</p>
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9.1.2. SOP: Alternate Recipient or NoK Not Paid

Definition	An AR or NoK was registered by the programme but cannot be paid.	
Reporting of Complaint	These complaints can be registered with either the Parish chief/ town agent, Sub-county/ Division CDO or through the toll-free hotline.	
Resolution Level	National Level - PMU	Standard Resolution Period is 30 Days
Level of Risk	MEDIUM	Grant cannot be accessed by the alternate or next of kin
Possible cause (s)	<p>Scenario 1: AR/NoK not approved in the SAGEMIS</p> <p>Scenario 2: AR/NoK details not submitted to PSP</p> <p>Scenario 3: AR /NoK not enrolled by PSP.</p>	
Investigation	<p>Basic Step: Using the NIN, the complaints officer checks on the status in the SAGEMIS the following;</p> <p>For Scenario 1: is there an approved AR/NoK in the SAGEMIS?</p> <p>For Scenario 2: was the detail of the AR/NoK shared with PSP?</p> <p>For Scenario 3: Was the AR/NoK enrolled by the PSP?</p>	
Resolution Options/Steps	<p>Option 1:</p> <p>Scenario 1:</p>	

	<p>If the alternate/NoK is in the SAGEMIS but pending approval, RTSU Coordinator approves the AR/NoK in the SAGEMIS</p> <p>Scenario 2:</p> <p>If AR/NoK details were shared with PSP on time then, PMU shares with PSP the lists for enrolment.</p> <p>Option 2: Scenario 3:</p> <p>If the AR is not enrolled by the PSP, mobilise and ask the PSP to enrol. In case the AR details has a mistake (like NID), ask the DLG correct the details and ask the PSP to enrol.</p>
Closure & Feedback	<ol style="list-style-type: none"> 1. The Complaints Officer at RTSU enters the findings in the SAGEMIS, RTSU Coordinator approves. 2. The Feedback is twofold; <ol style="list-style-type: none"> a) Resolution status in the DCR is recorded as "approved" for successful complaints and "rejected" for unsuccessful complaints. b) An "SMS" will be sent to the respective complainants for example: SAGE: Your complaint number 'xxx' has been approved (successful complaints) /Rejected (unsuccessful complaints), contact your parish chief/ town agent or sub-county/ Division CDO for details 3. The above communication shall be reinforced to the complainant by the parish chief/ town agent or sub-county/ Division CDO at the earliest opportunity or on the pay day using the information that has been shared in the DCR.

9.1.3. SOP: Dead Beneficiary on Current Payroll

Definition	A beneficiary who is known to have died or has previously been reported as deceased but still exists on the current payroll.
Reporting of Complaint	These complaints can be registered with either the Parish chief/ town agent, Sub-county/ Division CDO or through the toll-free hotline.
Resolution Level	Regional Level - RTSU Standard Resolution Period is 30 Days
Level of Risk	HIGH Ineligible beneficiary account continues to be credited
Possible cause (s)	Scenario 1: Death not reported administratively and no death notification form is completed

	<p>Scenario 2: Death report completed but submission to RTSU delayed</p> <p>Scenario 3: Death report entered in the SAGEMIS but is not approved by the RTSU Coordinator</p>
Investigation	<p>Basic Step: Using the NIN, Complaints Officer,</p> <ol style="list-style-type: none"> 1. Checks on the records and status of the beneficiary in the SAGEMIS. 2. Confirms that there are no records in the RTSU death register of formal /administrative death reports received from the DLGs
Resolution Options/Steps	<p>Option 1: If death reports received at the RTSU; Complaints Officer, enters the details in the SAGEMIS and informs RTSU Coordinator approve in it in the system.</p> <p>Option 2: If death report not at RTSU;</p> <ol style="list-style-type: none"> a) RTSU Coordinator sends list of complaints on persons reported dead to SCDO SAGE to investigate and complete the administrative death reports within 14 days to enable the SAGEMIS be updated. b) Ask the SCDO to inform the S-CDO to complete the death report for those confirmed dead. c) Submit the completed death reports to RTSU within 30 days. <p>Option 3: if death report in the SAGEMIS but not approved; Complaints officer notifies the RTSU Coordinator to approve the death in the system.</p>
Closure &Feedback	<p>The Feedback is three-fold;</p> <ol style="list-style-type: none"> i. Resolution status in the DCR is recorded as “approved” for successful complaints and “rejected” for unsuccessful complaints. ii. Any form of feedback to the complainant either through a phone call verbally or otherwise shall be recorded in the SAGEMIS. iii. An “SMS” will be sent to the respective complainants for example: <p>SAGE: Your complaint number ‘xxx’ has been approved (successful complaints) /Rejected (unsuccessful complaints), contact your parish chief/ town agent or sub-county/ Division CDO for details</p> <p>The above communication shall be reinforced to the complainant by the parish chief/ town agent or sub-county/ Division CDO at the earliest opportunity or on the pay day using the information that has been shared in the DCR.</p>

9.1.4. SOP: No Money / Less Money on Account

Definition	When an enrolled beneficiary has no money or less money on his/her account for a given entitlement period.	
Reporting of Complaint	<p>The beneficiary should be advised to first lodge a complaint with the PSP (Primary) and then register the same with the programme (Secondary).</p> <p>The programme reporting is through either the Parish chief/ town agent, Sub-county/ Division CDO or through the Toll-free hotline.</p>	
Resolution Level	Regional Level - RTSU	Standard Resolution Period is 30 Days
Level of Risk	MEDIUM	The likelihood of a fiduciary risk where an entitled beneficiary loses the whole or part of his grant.
Possible cause (s)	<p>Scenario 1: Account suspended/deactivated for EXIT reasons such as reported; DEAD, PENSIONER OR UNDERAGED</p> <p>Scenario 2: Was not on scheduled payment</p> <p>Scenario 3: Funds withdrawn by a third party for example alternate recipient or others such as bank deductions.</p> <p>Scenario 4: Correct amount not credited by the PSP as per approved payroll instruction</p>	
Investigation	<p>Basic Steps: Using the NIN, the complaints officer should check;</p> <ol style="list-style-type: none"> 1. If beneficiary status is 'Registered and Active'. 2. If active, check if beneficiary was on payroll for the period. If yes- the RTSU Coordinator escalates to PMU for submission to PSP. 3. If "Registered but not Active", check the status of the beneficiary with regards to the various reasons for suspension (See, Scenario 1 and 2 above). 	
Resolution Options/Steps	<p>Option 1: If according to the SAGEMIS, the beneficiary is suspended for EXIT reasons then, Complaint be referred in the DCR to the district/ city /municipal for review and an "SCG reinstatement form" be completed.</p> <p>Option 2: If beneficiary active in the SAGEMIS but not in the approved payroll schedule then, update the findings in the SAGEMIS action as "RESOLVED"</p> <p>Option 3: If beneficiary account is on payroll instructions for the entitlement period then;</p> <ol style="list-style-type: none"> a) RTSU coordinator escalates to the SPO C&G to investigate with PSP 	

	<ul style="list-style-type: none"> b) SPO C&G forwards cases to PSP and requests them to investigate and provide feedback within 14 days c) Note in the SAGEMIS, “Escalated to PSP on dd/mm/yy” case “PENDING” d) If feedback received, then update the SAGEMIS accordingly
Closure &Feedback	<p>The Feedback is threefold;</p> <ul style="list-style-type: none"> a) Resolution status in the DCR is recorded as “approved” for successful complaints and “rejected” for unsuccessful complaints. b) Any form of feedback to the complainant either through a phone call, verbally or otherwise shall be recorded in the SAGEMIS. c) An “SMS” will be sent to the respective complainants for example: SAGE: Your complaint number ‘xxx’ has been approved (successful complaints) /Rejected (unsuccessful complaints), contact your parish chief/ town agent or sub-county/ Division CDO for details <p>The above communication shall be reinforced to the complainant by the parish chief/ town agent or sub-county/ Division CDO at the earliest opportunity or on the pay day using the information that has been shared in the DCR.</p>

9.2 STANDARD OPERATING PROCEDURES FOR PAYMENT SERVICES COMPLAINTS

9.2.1. SOP: Delayed resolution of complaints/Absence of services

Definition	Delayed Resolution: When a registered person in the SCG programme reported his/her complaint to the PSP but is not addressed on time. Absence/Exclusion from Services: Beneficiary complains of exclusion from services of PSP or services are absent.	
Reporting of Complaint	These complaints can be registered either with the Parish chief/ town agent, Sub-county/ Division CDO or the toll-free hotline.	
Resolution Level	National Level - PMU	Standard Resolution Period is 45 Days
Level of Risk	MEDIUM	SCG beneficiary is not able to enjoy his/her rights as a client of the PSP as provided in the contract signed with MGLSD.

Possible cause (s)	<p>Scenario 1: Delayed Resolution of Complaints such as; No /less money on account, Unauthorised withdrawal on the account, NoK not enrolled, AR not enrolled</p> <ul style="list-style-type: none"> • Complaints reports lost/misplaced • No complaints Officer assigned • Resolved but feedback not provided <p>Scenario 2: Exclusion/Absence of Services complaints such as; No complaints desk, not paid due to network challenges, not paid due to liquidity challenges, Absence of enrolment services, Unfair exclusion from other services of the PSP;</p> <ul style="list-style-type: none"> • Some activities are not planned • Lack of guidelines or alternatives • Awareness not raised
Investigation	<p>Basic Steps: Scenario 1- Delayed Resolution of Complaints</p> <p>Using the NIN, the complaints officer should check;</p> <ol style="list-style-type: none"> i. If the beneficiary is active and the last cycle paid. ii. SAGEMIS if beneficiary is suspended/deactivated for various reasons. iii. SAGEMIS if there is an approved AR or NOK for the beneficiary. iv. Check if and when NoK/AR details were submitted to PSP. <p>Scenario 2- Exclusion /Absence of Services</p> <p>The complaints officer should check;</p> <ol style="list-style-type: none"> i. Check PSP contract and SLA to confirm the entitlements provided ii. Check the pay point monitoring reports for the location to ensure it's not just an isolated case. iii. Call SCDO-SAGE or sub-county/ Division CDO where additional information is required
Resolution Options/ Steps	<p>Scenario 1- Delayed Resolution of Complaints</p> <ol style="list-style-type: none"> i. Complaints officer resolves any complaints where resolution is in the programme and proceeds to prepare a detailed report for PSP to take-action on the unresolved complaints and provide an update ii. If relevant submissions (AR/NoK) by the district/ city /municipals are missing, RTSU Coordinator writes to the SCDO-SAGE district/ city /municipals to make submissions urgently. <p>Scenario 2- Exclusion /Absence of Services</p> <ol style="list-style-type: none"> i. Write to the PSP to clarify reasons for exclusion from or absence of services.

	<p>ii. Request the PSP to provide feedback to the complainants within 30 days and share the update accordingly.</p>
Closure & Feedback	<p>The Feedback is threefold;</p> <ul style="list-style-type: none"> a) Resolution status in the DCR is recorded as “approved” for successful complaints, “rejected” for unsuccessful complaints and “Pending” for those under investigation or referred to the PSP. b) Any form of feedback to the complainant either through a phone call, verbally or otherwise shall be recorded in the SAGEMIS. c) An “SMS” will be sent to the respective complainants for example: SAGE: Your complaint number ‘xxx’ has been approved (successful complaints) /Rejected (unsuccessful complaints), Pending- contact your parish chief/ town agent or sub-county/ Division CDO for details <p>The above communication shall be reinforced to the complainant by the parish chief/ town agent or sub-county/ Division CDO at the earliest opportunity or on the pay day using the information that has been shared in the DCR.</p>

9.3 STANDARD OPERATING PROCEDURES FOR PROGRAMME RELATED GRIEVANCES

9.3.1. SOP: Fraud or Corruption

Definition	<p>Fraud and Corruption in the SCG refers to <u>allegations</u> of unethical practices by duty bearers of the programme and the PSP that can be in the form of; Soliciting “kickbacks”, Charging illegal fees for service, taking part or the whole beneficiary entitlement or any form of unlawful monetary gain.</p> <p>Note: This SOP is restricted only to fraud/corruption that is perpetuated by duty bearers in the programme or payment service during the discharge of their duties.</p>
Reporting of Complaint	<p>PSP related corruption /fraud can be registered with either the Parish chief/ town agent, Sub-county/ Division CDO or through the Hotline of both the programme and PSP.</p> <p>If the allegation involves programme or DLG staff; complainants should raise it either through the SCG complaints toll free hotline.</p> <p>Complaints can also directly be reported to the;</p>

	PS MGLSD, Chief Administrative Officer (CAO), Inspectorate of Government (IG), Resident District /City Commissioner or Police, Council of Older Persons, Head PMU.	
Resolution Level	National Level - PMU	Standard Resolution Period is 45 Days
Level of Risk	HIGH	Fraud and corruption can bring the programme to disrepute by denying beneficiaries their entitlements.
Possible cause (s)	<p>Scenario 1: Lack of awareness among beneficiaries and stakeholders about their rights on the programme.</p> <p>Scenario 2: Collusion between programme duty bearers and PSP staff.</p> <p>Scenario 3: Weak oversight function on the SCG implementation or weak internal controls</p>	
Investigation	<p>Allegations require a broader investigation and involve one or more of the following; collaborating with other mandate institutions and working with the responsible authorities supervising the alleged perpetrators.</p> <p>Below are some of the hints.</p> <ol style="list-style-type: none"> Was the act perpetuated by a programme duty bearer or PSP staff? What is the likelihood that it could have happened to others? How much is the loss claimed by the complainant? What could have caused the problem? awareness on rights. 	
Resolution Options/Steps	<p>Given that these are treated as allegations, the resolution of such complaints will require a multidimensional approach and working closely with the institutions the alleged perpetrators represent to avoid any legal ramifications.</p> <p>The complaints officer shall;</p> <ul style="list-style-type: none"> Inform the Head/PMU about the complaints lodged and seek guidance If the allegations are on PSP staff or DLG, draft a letter for PS MGLSD's signature to the Head of the institution to undertake investigation, or take appropriate action and provide feedback. If the allegations are on DLG staff, draft letter for PS MGLSD's signature to the CAO to investigate, take-action and provide feedback. If complaint arising from the lack of awareness on certain rights, prepare and widely disseminate messages to the public to reduce the risk of future occurrence. 	
Case Closure &Feedback	<ol style="list-style-type: none"> If the case is under investigation, then on the DCR the complaint is updated as "PENDING" and "SMS" to complainant <i>"SAGE: Your complaint reference number 'xxx' is PENDING"</i> 	

	<ol style="list-style-type: none"> 2. Any form of feedback to the complainant either through a phone call, verbally or otherwise shall be recorded in the SAGEMIS. 3. Once investigations are concluded and action taken then on the DCR the complaint is updated as "CLOSED" and "and feedback (e.g. SMS)" to the complainant: (SAGE: Your complaint reference 'xxx' is closed). 4. The SPO C&G shall prioritise the tracking of progress on these complaints
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9.3.2. SOP: Eligible but Not on the Provisional Beneficiary List (Not Targeted)

Definition	An individual who meets the eligibility requirements but is not on the provisional beneficiary list (targeted).	
Reporting of Complaint	These complaints can be registered with either the Parish chief/ town agent, Sub-county/ Division CDO, Program staff or through the toll-free hotline.	
Resolution Level	National Level - PMU	Standard Resolution Period is 30 Days
Level of Risk	MEDIUM	Excluding eligible persons from the programme
Possible cause (s)	<p>Scenario 1: Newly³ registered for National ID</p> <p>Scenario 2: Person is a pensioner.</p> <p>Scenario 3: National ID presented is not authentic or Inactive in NIRA database.</p> <p>Scenario 4: Erroneously missed.</p>	
Investigation	<p>Basic Step: Using the NIN, the complaints officer should check;</p> <ol style="list-style-type: none"> 1. If person has records available in the SAGEMIS and meets age eligibility 2. If person is not a pensioner. 	
Resolution Options/Steps	<p>Option 1: If person has records available in the SAGEMIS, meets eligibility age, is not a pensioner then, complaints Officer recommends to be approved by RTSU coordinator for verification and registration</p> <p>Option 2: If person has no records available in the SAGEMIS, complaint officers should validate the NIN using the single registry or the</p>	

³ After the programme already accessed targeting data or ID details not accessible in the Single Registry.

	<p>nearest NIRA Local office and if persons meets eligibility age, is not a pensioner then, recommends to be approved by RTSU coordinator for verification and registration.</p> <p>On the basis of the outcome of the investigation conducted, one or more of the following updates should be made on the complaint report in the SAGEMIS as the basis of the decision taken;</p> <ol style="list-style-type: none"> "NIN VALID"- to mean the NIN provided is valid "NIN NOT VALID"- to mean the NIN provided is valid "PEN"- to mean the person is listed as a pensioner "NOTPEN"- to mean the person is not listed as a pensioner
Closure & Feedback	<p>The Feedback is threefold;</p> <ol style="list-style-type: none"> Resolution status in the DCR is recorded as "approved" for successful complaints and "rejected" for unsuccessful complaints. Any form of feedback to the complainant either through a phone call, verbally or otherwise shall be recorded in the SAGEMIS. An "SMS" Feedback will be sent to the respective complainants for example: SAGE: Your complaint reference 'xxx' has been approved (successful complaints) /Rejected (unsuccessful complaints), contact your parish chief/ town agent or sub-county/ Division CDO for details <p>The above communication shall be reinforced to the complainant by the parish chief/ town agent or sub-county/ Division CDO at the earliest opportunity, media or on the pay day using the information that has been shared in the DCR.</p>

9.3.3. SOP: Exclusion or Inclusion in the SCG due to ID Error

Definition	<p>Individuals who believe they are or someone is wrongfully excluded/included in the targeting list of the programme due to errors in the date of birth (DOB) on their National Identity card.</p>	
Reporting of Complaint	<p>These complaints can be registered with either the Parish chief/ town agent, Sub-county/ Division CDO, Programme staff or through the toll-free hotline</p>	
Resolution Level	REGIONAL LEVEL - RTSU	Standard Resolution Period is 45 Days

Level of Risk	HIGH	Excluding eligible or including ineligible persons affects the achievement of the overall programme goal.
Possible cause (s)		Scenario 1: Person alleges to have been registered with a wrong date of birth during the National Identity card registration.
Investigation		Basic Step: Using the NIN/ID, the complaints officer should check; <ol style="list-style-type: none"> 1. For complaints related to inclusion errors- is the person is an SCG beneficiary? Secondly, was the person registered in the pilot or the rollout districts? 2. For exclusion errors, verify NIN with the National single registry system or local NIRA offices
Resolution Options/Steps		<p>Option 1: For inclusion error:</p> <ol style="list-style-type: none"> a) If the alleged under-aged beneficiary was registered in the Pilot Phase, and the age on the National ID age is above 60 years for Karamoja or 65 years in others, the complaints officer notes “eligible pilot district” and recommends approval of the complaint to be closed. b) If the alleged under aged beneficiary is registered in the rollout districts and below 80 years, the complaints officer notes “ineligible rollout district” and recommends “de-registration” or “suspension” if investigation are not yet concluded. c) RTSU coordinator approves the recommendation in the system. <p>Option 2: For exclusion error; If NIN is valid, person meets eligibility age, is not a pensioner then complaints officer notes in the SAGE MIS (Valid NIN, Not Pensioner) and recommends person be approved for registration by RSTU, verification by Government duty bearers and enrolment PSP.</p>
Closure &Feedback		<p>The Feedback is threefold;</p> <ol style="list-style-type: none"> a) Resolution status in the DCR is recorded as “approved” for successful complaints and “rejected” for unsuccessful complaints. b) Any form of feedback to the complainant either through a phone call, verbally or otherwise shall be recorded in the SAGEMIS. c) An “SMS” Feedback will be sent to the respective complainants for example: SAGE: <i>Your complaint reference ‘xxx’ has been approved (successful complaints) /Rejected (unsuccessful complaints), contact your parish chief/ town agent or sub-county/ Division CDO for details</i> <p>The above communication shall be reinforced to the complainant by the parish chief/ town agent or sub-county/ Division CDO at the earliest</p>

	opportunity or on the pay day using the information that has been shared in the DCR.
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9.3.4. SOP: Delayed or Absence of Programme Services

Definition	A beneficiary feels a service they are entitled to in the programme is either not available on time as expected or of poor quality. These services can be: registration, complaints management, change management.	
Reporting of Complaint	These complaints can be registered with either the Parish chief/ town agent, Sub-county/ Division CDO, Programme staff or through the Hotline.	
Resolution Level	REGIONAL LEVEL - RTSU	Standard Resolution Period is 45 Days
Level of Risk	Moderate	Inability to access timely and quality services in the programme affects the achievement of programme objectives
Possible cause (s)	Scenario 1: Duty bearers unavailable in their respective service points Scenario 2: Weak supervision of the implementation of programme services Scenario 3: Lack of awareness about the availability and plans for programme services Scenario 4: Tools/ Management forms have not been replenished to support various processes.	
Investigation	These allegations require conducting a broader investigation. The complaints Officer should get additional information from the Sub-county/ Division CDO or SCDO-SAGE to support the resolution of this complaint. Ideas to investigate Such complaints may include; <ul style="list-style-type: none"> • Is there a justifiable reason why there was delayed or absence of these services? • Was there prior communication to beneficiaries/stakeholders about delays or absence of services? • Is the complaint localised to some districts/regions? e.g. arising out of non-performance of a duty bearer • Is the problem within the programmes control or requires other interventions? • Have the programme implementers run out of stock of the requisite management forms? 	

Resolution Options/Steps	<p>The resolution of such complaints shall require a multidimensional approach;</p> <ol style="list-style-type: none"> 1. RTSU Coordinator will work with the DCDO/SCDO to investigate. If allegations are factual and gross, report to CAO and PS accordingly for action to be taken. 2. If the complaints are arising from non-performance of SCG functions by mandated duty bearer at the district/ city /municipal level. DCDO/SCDO work with RTSU Coordinator to escalate to supervisor of the staff for appropriate sanctions. 3. If the cases are arising from a lack of awareness about the planned services; tailored messages should be prepared and disseminated through the various channels. 4. If complaint arising out of lack of management forms, the programme should replenish accordingly.
Closure &Feedback	<p>The Feedback is twofold;</p> <ol style="list-style-type: none"> a) Resolution status in the DCR is recorded as “Resolved” for resolved complaints and “pending” for those under investigation. b) Any form of feedback to the complainant either through a phone call, verbally or otherwise shall be recorded in the SAGEMIS. c) An “SMS” Feedback will be sent to the respective complainants for example: <i>SAGE: Your complaint reference ‘xxx’ has been RESOLVED OR PENDING, contact your parish chief/ town agent or sub-county/ Division CDO for details</i> <p>The above communication shall be reinforced to the complainant by the parish chief/ town agent or sub-county/ Division CDO at the earliest opportunity or on the pay day using the information that has been shared in the DCR.</p>

9.3.5. SOP: Abuse of a Beneficiary

Definition	<p>Refers to <u>allegations</u> of abuse on a beneficiary by a duty bearer either in the programme or with the PSP while discharging their duties. These abuses can be emotional and psychological or physical in nature.</p> <p>Emotional and Psychological abuse may include; verbal threats, use of belittling words, etc., while physical abuse can be in the form of rough handling, non-consensual sexual contact, etc.</p>
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Reporting of Complaint	<p>All cases relating to allegations about the abuse of beneficiaries should be raised directly through the SCG complaints Toll free hotline.</p> <p>Sexual offences such as sexual harassment and criminal in nature should be reported to the nearest Police Station.</p>	
Resolution Level	NATIONAL /RTSU/DISTRICT LEVEL	Standard Resolution Period is 45 Days
Level of Risk	HIGH	Abuse of any nature increases the level of vulnerability of the beneficiaries
Possible cause (s)	<p>Scenario 1: Lack of skills and knowledge (capacity) on how to handle older persons</p> <p>Scenario 2: Weak oversight on the staff implementing the SCG services</p> <p>Scenario 3: Lack of awareness on the rights and responsibilities of older persons.</p> <p>Scenario 4: Negative attitude of duty bearers</p>	
Investigation	<p>These allegations require a broader and working with other stakeholders. The complaints Officer should get additional information from the Sub-county/ Division CDO or SCDO-SAGE to support the resolution of this complaint.</p> <p>Below are some ideas for the Complaint Officer:</p> <ul style="list-style-type: none"> • Who is the alleged perpetrator? programme duty bearer or PSP staff. • Was it reported to the PSP and provided a reference number? • What additional information or evidence is available? • Has it been reported to another entity and what is the progress? 	
Resolution Options/Steps	<p>Given that these are treated as allegations, the resolution of such complaints shall require a multidimensional approach:</p> <ol style="list-style-type: none"> 1. RTSU Coordinator will work with the DCDO/SCDO to investigate. If allegations are factual and gross, report to CAO and PS according for action to be taken. 2. If the complaints are arising from PSP staff, RTSU escalates to PMU and SPO C&G works with the SOO to report to the relevant PSP officer for action and appropriate sanctions. 3. If complaint reported to PSP or Police, SPO C&G follows up with responsible PSP staff to ensure its addressed. 4. If the cases are arising from a lack of awareness on rights and responsibilities of beneficiaries, key messages should be prepared and disseminated through the various channels. 	

Closure & Feedback	<p>Closure of such cases may take time since thorough investigation has to be undertaken by the respective entities.</p> <p>The Feedback is twofold;</p> <ul style="list-style-type: none"> a) Resolution status in the DCR is recorded as “Resolved” for resolved complaints and “pending” for those under investigation. b) Any form of feedback to the complainant either through a phone call, verbally or otherwise shall be recorded in the SAGEMIS. c) An “SMS” feedback will be sent to the respective complainants for example: <i>SAGE: Your complaint reference ‘xxx’ has been RESOLVED OR PENDING, contact your parish chief/ town agent or sub-county/ Division CDO for details</i> <p>The above communication shall be reinforced to the complainant by the parish chief/ town agent or sub-county/ Division CDO at the earliest opportunity or on the pay day using the information that has been shared in the DCR. A complaint shall be closed in the SAGEMIS once it's resolved and the complainant has been informed of the out-come</p>
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CHAPTER 10: APPEALS PROCESS

The purpose of this section is to provide a clear and structured process for lodging appeals in the SCG. The appeals processes include; steps for filing an appeal form, review procedures, and communicating the outcomes.

10.1 APPEALS, SUBMISSION, TRANSMISSION, AND RESOLUTION

The programme shall implement a two-tier appeals process;

1. District/ city /municipal level and;
2. Programme level.

The appeals process shall ensure the beneficiaries have the opportunity to seek a review of decisions they believe are incorrect or unfair to them with regards to the outcome of their complaint and/or grievance.

10.1.1 Appeal Levels

a) **Appealing to the District/ city /municipal Level**

The Chief Administrative Officer (CAO) supported by the District/ city /municipal Community Development Officer (DCDO) shall be responsible for handling all the appeals submitted. The CAO and DCDO are not directly involved in the implementation of the SCG programme. In order to facilitate the efficient handling of appeals, the CAO will be availed with the DCR that has information on all complaints lodged, the basis of decisions made & those resolved or pending.

b) **Appealing to the Programme Level**

If a person is not comfortable with appealing at the district/ city /municipal level, then he/she can lodge it at the programme level. The Deputy Head of ESP supported by the SPO C&G will be responsible for handling all appeals submitted at the programme level. Appeals to the programme can either be lodged using the appeals form or directly through the hotline.

10.1.2 Step-by-Step Process in the Submission and Resolution of Appeals

In the first instance, appeals should be submitted to the Parish chief/ town agent at any time or during paydays. The Parish chief/ town agent is responsible for supporting the appellant to document the appeal by completing the *SCG Appeals Form (Annex 6)*. All appeals received

should be recorded in the DTR and then submitted to the sub-county/ Division CDO, SCDO SAGE and to the CAO, Municipal /City Clerk or RTSU.

The process will unfold in four steps:

- Step 1. [Lodging appeals](#),
- Step 2. [Investigation](#),
- Step 3. [Closure](#)
- Step 4. [Feedback](#)

Table 3: Steps in the Appeals Process

LODGING APPEALS	
Step1: Initial Decision Notification on the complaint	Communication and time frame Beneficiaries will be informed of the initial decision regarding their complaint or grievance through the SMS or Parish chief/ town agent and their right to appeal.
Step 2: Filing an Appeal	An individual can file an appeal through the following channels <ul style="list-style-type: none"> a) APPEALS FORM: available with the following duty bearers: Parish chief/ town agent, Sub-county/ Division CDO, Senior CDO-SAGE, CDO at the district/ city /municipal or RTSU b) HOTLINE: Numbers provided in Chapter 5
Step 3: Acknowledgement of Appeal	There will be two levels of acknowledgement provided: <ul style="list-style-type: none"> a) At the point of lodging; the appellant will be given a tear off at the time of lodging the appeal. At this point the appellant will be informed on the next steps and the duration it will take. b) When appeal is entered in the SAGEMIS: An SMS notification will be sent to registered number of the appellant once the appeal has been entered in the SAGEMIS
INVESTIGATION BY CAO AND DEPUTY, HEAD ESP	
Step 4: Review the Merits	<ul style="list-style-type: none"> a) Review: Each appeal will be reviewed by the responsible authority to determine the merits of each case. This may involve re-evaluating evidence from how it was previously handled, gathering additional information, and consulting other stakeholders. b) Documenting: The responsible authority will document the findings that will form the basis of the decision taken c) Decision:

	<ul style="list-style-type: none"> i. if the findings suggest that the appeal has MERIT, responsible authority recommends on the form for the appeal to be upheld. ii. If appeal has NO MERIT, then responsible authority recommends appeal be rejected <p>d) Communication: A follow up communication will be made through SMS to the appellants registered number. A generic message "Your appeal reference 1234 was Successful /NOT successful" The detailed reasons will be available with the Sub-county/ Division CDO /Parish chief/ town agent through the District/ city /municipal Reports.</p>
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CLOSURE AND FEEDBACK

Closure &Feedback	<p>The Feedback is twofold;</p> <ul style="list-style-type: none"> a) Resolution status in the DCR is recorded as "successful" for appeals upheld, "pending" for those under investigation and "Rejected" for those dismissed b) An "SMS" will be sent to the respective complainants for example: <i>SAGE: Your appeal reference 'xxx' is SUCESSFUL, PENDING OR REJECTED, contact your parish chief/ town agent or sub-county/ Division CDO for details</i> <p>The above communication shall be reinforced to the complainant by the parish chief/ town agent or sub-county/ Division CDO at the earliest opportunity or on the pay day using the information that has been shared in the DCR.</p> <p>An appeal shall be closed in the SAGEMIS once it's resolved and the complainant has been informed of the out-come</p>
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10.1.3 Appeals Related to Date of Birth on the National Identity Card.

Complaints that require changing information on an individual's national identity card are under NIRA's mandate and cannot be resolved within the programme's jurisdiction. Therefore, the generic appeals process outlined above applies to only complaints regarding dissatisfaction with an outcome of a resolution handled within the programme's prerogative.

Under the SCG, appeals relating to the two categories below principally fall within NIRA's jurisdiction;

- a) **Understated Age on National ID:** These are complaints arise when individuals claim that NIRA recorded an incorrect date of birth, hence making them ineligible for the SCG, and they seek to have it corrected.
- b) **Overstated Age on the National ID:** Complaints in this category typically come from third parties contesting the inclusion of ineligible persons in the programme due to the alleged overstated date of birth on their National ID.

For both cases, the programme will have to work with the relevant institutions responsible and NIRA to agree on the guidelines for investigating and resolving complaints relating to potential exclusion or inclusion errors. The complaints Officer for all appeals shall be the SPO C&G who will ensure proper coordination and follow up.

The handling steps for the cases outlined below are based on the pilot implementation and may be subject to amendments.

1. Establishing a Sub-county/ Division Vetting Committee (SVC)

The Sub-county/ Division vetting committee (SVC) will be composed of seven (08) members that will convene for every session at an agreed designated location. The SVC shall have sufficient quorum to sit of at least five (05) members in order to conduct business. Alternates are provided in case designated members are not available. The members and respective alternates for the SVC are;

Table 4: Membership of the Vetting Committee

S/No	Member	Role	Alternate
1	Chairperson Older Persons Council at Subcounty/Division	Chair	Executive of OPC at Sub-county/ Division
2	DCDO	Co-Chair	SCDO-SAGE
3	The Sub-county/ Division CDO	Member/Secretary	Parish chief/ town agent
4	The respective Parish chief/ Town agent	Member /Presenter	Parish chief/ town agent
5	Male and Female councillors representing older persons at the sub-county/ Division (2)	Member	Executives of the OPC at the parish/Ward level
6	Gombolola Intelligence Security Officer	Member	
7	The RTSU Coordinator	Ex-Officio	Operations Officer

2. Roles of Sub-county/ Division Vetting Committee (SVC)

During the SVC sessions, the RTSU staff will bring to the committee both the respective district/ city /municipal reports and the Appeals Forms for cross-verification. The SVC will be responsible for;

- a) Reviewing every appeal.
- b) Hearing each appeal on its merit.
- c) Communicating the outcome of the appeal to the appellant.

10.1.4 Steps in conducting an appeals session

Step 1: Provide Supporting Documentation

The appellant should be able to provide additional documents to back up a claim of understated age or prove that their age was not overstated. They include; Voter's Card, NIRA Birth Certificate, Baptism Certificate, Driving Permit, NIRA Marriage Certificate, Previous work identity card, NIRA Birth Certificate of biological children and Other documents that may support his/her case

Step 2: Endorsement of the Appeal

The appellant must provide two primary SCG beneficiaries who are well acquainted with them to testify in support of their appeal during the hearing. These endorsers should be ready to interact with the Sub-county/ Division Vetting Committee (SVC) and respond to any questions. Their testimonies will be critical in validating the merits of the appeal. The appellant has the right to have a representative to support them through the hearing process.

Step 3: Review of the Evidence and Testimonies of Endorsers

The SVC will review the evidence provided by the appellant, their testimony, and the testimonies of their endorsers to decide on the appeal. If all the information corroborates the grounds of the appeal, it will be recommended for APPROVAL. If not, the appeal will be REJECTED. The feedback will immediately be communicated to all appellants during the hearing, and an appeals report will be completed and signed by all members of the SVC.

Step 4: Statutory Declaration for APPROVED Appeals

For all approved appeals, the programme will arrange for the appellants to swear a statutory declaration specifying the corrections needed on their national ID details. To minimize costs, the programme shall enlist local magistrates to provide pro bono services as commissioners of oath to support the elderly. The programme will assist appellants in paying the requisite statutory fees (unless a prior waiver is approved) for filing the instruments with Uganda Registration Services Bureau (URSB) and making payments to

NIRA for change of details on the National ID. These documents will be submitted to NIRA headquarters to make the necessary changes.

Step 5: Case Closure

For approved appeals relating to understated age, once NIRA updates its records, the appellant will be enrolled in the programme and the grant paid using the last approved entitlement period in the programme or as recommended. These cases will be marked as "**Approved-Appeals**" and follow up with NIRA by SPO C&G to ensure that the DoBs are corrected and then this case updated in C&G Module in the SAGEMIS as "CLOSED".

For appeals concerning overstated age, if the appeal is approved, the beneficiary will be suspended in the SAGEMIS and if NIRA updates the records then the beneficiary is de-registered. The SAGEMIS will update the case as "**Deregistered-Appeals**" and mark the case as "CLOSED".

CHAPTER 11: MONITORING, EVALUATION AND INFORMATION MANAGEMENT

Effective information management and robust monitoring and evaluation (M&E) systems are critical components for the success of the SCG. These systems will ensure that data related to complaints and grievances are accurately captured, securely stored, and efficiently analyzed.

By systematically tracking and evaluating this information, the programme will identify trends, measure performance, and make data-driven decisions to improve service delivery. Comprehensive M&E practices enable continuous learning and adaptation, ensuring that the SCG remains responsive to the needs of its beneficiaries and operates with the highest standards of accountability and transparency.

11.1 MONITORING AND EVALUATION OF THE SCG C&G

The M&E for SCG C&G will be implemented within the overall M&E framework of the SAGE programme. A robust M&E framework enables the program to track the performance of the grievance handling process, assess its impact on beneficiaries, and identify areas for enhancement.

The implementation of the M&E for the C&G will be guided by two overarching principles namely:

- (i) enhanced efficiency and effectiveness in complaints and grievance resolution
- (ii) increased accountability and trust in the C&G process. A summary of the M&E plan for the C&G is provided below;

Table 5 : C&G Monitoring and Evaluation Plan

SN	Indicator	Definition/Indicators	Frequency	Data Source	Responsible Person
1	Volume of complaints	<ul style="list-style-type: none"> • No. of complaints (by category) received 	Quarterly	SAGEMIS	SPO (C&G)
2	Improved Response Time	<ul style="list-style-type: none"> • Time taken to acknowledge receipt of a complaint (by category) • Time taken to provide feedback to a complainant (by category) 	Quarterly	SAGEMIS	SPO (C&G)

3	Resolution Rate	<ul style="list-style-type: none"> % of complaints & grievances resolved within specified timeframe (by category) 	Quarterly	SAGEMIS	SPO (C&G)
4	Resolution Time:	<ul style="list-style-type: none"> Time taken to resolve a complaint, (by category) No. of complaints resolved on time (by category) 	Quarterly	SAGEMIS	SPO (C&G)
5	Satisfaction Rate:	<ul style="list-style-type: none"> % of complainants satisfied with the C&G mechanism 	Bi-Annual	Survey	SPO (M&E)
6	Repeat Complaints	<ul style="list-style-type: none"> No. of repeated complaints & grievances 	Quarterly	SAGEMIS	SPO (C&G)
7	Systems audit & Quality assurance	<ul style="list-style-type: none"> Quality of data in the SAGEMIS Quality of the reports generated Effectiveness of the C&G functions Adequacy of the C&G functions in the SAGEMIS 	Bi-Annual	Survey	SPO (M&E)

11.2 INFORMATION MANAGEMENT

The information management for the C&G system will have the following features and capabilities:

- (i) **System Design and Architecture:** The C&G Module in the SAGEMIS will have a centralized database to store all complaints, grievances and appeals-related data. The system will have a user-friendly interface to support entry and follow-up of all actions. Lastly, the C&G system will be adaptable and scalable to any changes as required.
- (ii) **Data Collection and Manual Entry Protocols:** In the initial period when the SAGEMIS is still being upgraded, the C&G module in the SAGEMIS is designed to allow information from the manually filled forms to be entered. This is supported by clear protocols for data

entry into the SAGEMIS, ensuring accuracy and completeness. Further developments in the future will include having standardized electronic forms for complaints & grievance submission.

- (iii) **Data Processing and Workflow Management:** The C&G module will need to develop automation for workflow processes such as assignment of complaints, setting deadlines, tracking resolution status, and notifications for pending actions.
- (iv) **Data Security and Confidentiality:** The C&G module will benefit from the SAGEMIS security features, which cover areas like access, data encryption and backup/recovery.
- (v) **Reporting and Compliance Monitoring:** The C&G module will have the capacity to generate customized reports for various stakeholders, including national and district/ city /municipal level reports required for the SCG Operations. The C&G module should enable the processing of reports to monitor compliance of the PSP with the SLA provisions.
- (vi) **Communication and Feedback:** The C&G module will include automated notifications to complainants at two key stages: acknowledgement of receipt and resolution notifications.
- (vii) **Compliance and Audit Trails:** The C&G module will feature comprehensive audit logs to track all actions taken within SAGE MIS. This ensures transparency and accountability.
- (viii) Providing a clear record of every action and the responsible person.

ANNEXES

Annex 1: SCG Complaints Form

C & G Form serial no:

SCG Complaints & Grievances Form

Date

DD / MM / YYYY

Channel (Tick One)

Parish/Ward Agent

CDO Senior CDO

 SAGE staff

○ Hotline

Section A: Beneficiary Information

Complainant Name (s)		Is the Complainant a Beneficiary		Beneficiary NIN																												
		<input type="radio"/> Yes	<input type="radio"/> No																													
				Account Number																												
Contact Information for feedback		Is Phone for Beneficiary		Complainants Location																												
<input type="radio"/> Yes <table border="1" style="display: inline-table; vertical-align: middle;"> <tr><td>0</td><td> </td><td> </td></tr> </table>		0																				<input type="radio"/> No	District/City/Municipality									
		0																														
		Sub county/Division																														
		Parish/ward																														
Village/Cell																																

Section B: Complaint Details

1. Program Services Complaints		2. Payment Services Complaint		3. Program related Grievance's	
1. Name Missing on Current Payroll	<input type="radio"/>	1.Delayed Resolution of Complaints	<input type="radio"/>	1.Fraud or Corruption	<input type="radio"/>
<input type="radio"/> 1.1 Alternate Not Paid	<input type="radio"/>	2.1 Exclusion from PSP Services		2.Eligible person but Not on the Provisional Ben. List (targeted)	<input type="radio"/>
<input type="radio"/> 1.2 NoK Not paid	<input type="radio"/>	2.2. Absence of PSP Services			
2. Alternate/NoK not with PSP for enrolment	<input type="radio"/>	Reference NO of PSP Complaint		3.Excluded in SCG due to ID Error	<input type="radio"/>
3. No Money on Account	<input type="radio"/>			4. Included in SCG due to ID Error	<input type="radio"/>
4. Less Money on Account	<input type="radio"/>	Additional Information:		5. Delayed Programme Services	<input type="radio"/>
				6. Abuse of a Beneficiary	<input type="radio"/>

Section C: Findings and Resolution

Parish/Ward Agent	CDO	SCDO-SAGE	RTSU
Name:	Name:	Name:	Name:
Sign:	Sign:	Sign:	Sign:
DD / MM / YYYY			
<input type="radio"/> Resolved or <input type="radio"/> Referred			

Receiver details				
Name.....	Title.....	Signature.....	Date: DD / MM / YYYY	
RTSU/PMU use only (SAGEMIS data entry details)				
Entered by:	Name.....	Title.....	Signature.....	Date: DD / MM / YYYY

C & G Form serial no:

Complaint Category

Date / /

Complaint Category

1 Program Service

2 Payment Service

3 Grievances

Annex 2: Document Transmission Register

SCG Document Transmission Register (DTR)

Submission Information			Document Information				
#	Initials of Doc type	Serial or ref/No	Contact Provided	Submission Date	Reference Number(If Applicable)	Received By	Date Received
			0	DD / MM / YYYY			DD / MM / YYYY
			0	DD / MM / YYYY			DD / MM / YYYY
			0	DD / MM / YYYY			DD / MM / YYYY
			0	DD / MM / YYYY			DD / MM / YYYY
			0	DD / MM / YYYY			DD / MM / YYYY
			0	DD / MM / YYYY			DD / MM / YYYY
			0	DD / MM / YYYY			DD / MM / YYYY
			0	DD / MM / YYYY			DD / MM / YYYY
			0	DD / MM / YYYY			DD / MM / YYYY

Annex 3: RSTU Complaints Register

RTSU Complaints Register (RCR)

Document Information					Submission Information			
Serial No or Ref No on Form	Complain Type (Tick One)	Contact Provided	District/City /Municipality	Channel of receipt (Tick One)	Date Submitted	Complain Status (Tick One)	Received By Initials	Date Received
	<input type="radio"/> Program <input type="radio"/> Payment <input type="radio"/> Grievance	<input type="text"/> d		<input type="radio"/> Paypoint <input type="radio"/> Parish Chief <input type="radio"/> SCDO <input type="radio"/> RTSU <input type="radio"/> Hotline	<u>DD / MM / YYYY</u>	<input type="radio"/> Open <input type="radio"/> Closed		<u>DD / MM / YYYY</u>
	<input type="radio"/> Program <input type="radio"/> Payment <input type="radio"/> Grievance	<input type="text"/> d		<input type="radio"/> Paypoint <input type="radio"/> Parish Chief <input type="radio"/> SCDO <input type="radio"/> RTSU <input type="radio"/> Hotline	<u>DD / MM / YYYY</u>	<input type="radio"/> Open <input type="radio"/> Closed		<u>DD / MM / YYYY</u>
	<input type="radio"/> Program <input type="radio"/> Payment <input type="radio"/> Grievance	<input type="text"/> d		<input type="radio"/> Paypoint <input type="radio"/> Parish Chief <input type="radio"/> SCDO <input type="radio"/> RTSU <input type="radio"/> Hotline	<u>DD / MM / YYYY</u>	<input type="radio"/> Open <input type="radio"/> Closed		<u>DD / MM / YYYY</u>
	<input type="radio"/> Program <input type="radio"/> Payment <input type="radio"/> Grievance	<input type="text"/> d		<input type="radio"/> Paypoint <input type="radio"/> Parish Chief <input type="radio"/> SCDO <input type="radio"/> RTSU <input type="radio"/> Hotline	<u>DD / MM / YYYY</u>	<input type="radio"/> Open <input type="radio"/> Closed		<u>DD / MM / YYYY</u>
	<input type="radio"/> Program <input type="radio"/> Payment <input type="radio"/> Grievance	<input type="text"/> d		<input type="radio"/> Paypoint <input type="radio"/> Parish Chief <input type="radio"/> SCDO <input type="radio"/> RTSU <input type="radio"/> Hotline	<u>DD / MM / YYYY</u>	<input type="radio"/> Open <input type="radio"/> Closed		<u>DD / MM / YYYY</u>
	<input type="radio"/> Program <input type="radio"/> Payment <input type="radio"/> Grievance	<input type="text"/> d		<input type="radio"/> Paypoint <input type="radio"/> Parish Chief <input type="radio"/> SCDO <input type="radio"/> RTSU <input type="radio"/> Hotline	<u>DD / MM / YYYY</u>	<input type="radio"/> Open <input type="radio"/> Closed		<u>DD / MM / YYYY</u>

Annex 4: District Complaints Report

DISTRICT COMPLAINTS REPORT (DCR)**Report Date**DD / MM / YYYY**District/City/Municipality**

Complainant Serial No	Complaint Type (Tick One)	Name of Complainant (If Applicable)	NIN	Sub-County / Division	Parish /Ward	Key Finding(s)	Complaint Status (Resolved, Approved, Rejected, Pending)
	<input type="radio"/> Program <input type="radio"/> Payment <input type="radio"/> Grievance <input type="radio"/> Appeal		_____				
	<input type="radio"/> Program <input type="radio"/> Payment <input type="radio"/> Grievance <input type="radio"/> Appeal		_____				
	<input type="radio"/> Program <input type="radio"/> Payment <input type="radio"/> Grievance <input type="radio"/> Appeal		_____				
	<input type="radio"/> Program <input type="radio"/> Payment <input type="radio"/> Grievance <input type="radio"/> Appeal		_____				
	<input type="radio"/> Program <input type="radio"/> Payment <input type="radio"/> Grievance <input type="radio"/> Appeal		_____				
	<input type="radio"/> Program <input type="radio"/> Payment <input type="radio"/> Grievance <input type="radio"/> Appeal		_____				
	<input type="radio"/> Program <input type="radio"/> Payment <input type="radio"/> Grievance <input type="radio"/> Appeal		_____				

Annex 5: SCG Reinstatement Form

SCG Reinstatement Form Serial No:

SCG Reinstatement Form

Date / /

Channel (Tick One) Parish/Ward Agent CDO Senior CDO SAGE staff Hotline

Section A: Beneficiary Information

Beneficiary Name (s)	Is Complainant Beneficiary		Beneficiary NIN									
	<input type="radio"/> Yes	<input type="radio"/> No										
			Account Number									
Contact Information for feedback	Is Phone for Beneficiary		Residential Information									
0 _____	<input type="radio"/> Yes	<input type="radio"/> No	District/City/Municipality									
			Sub county/Division									
			Parish/ward									
			Village/Cell									

Section B: Details of Suspension

Reason for Suspension/Deregistration.....

Section C: Resolutions

After Careful Investigation and review of available records, I hereby recommend that the above named SAGE Beneficiary be reinstated into the program for the reason(s) stated below;

Program Services Complaints		Payment Services Complaint		Program related Grievance's	
Not Dead	<input type="radio"/>	Beneficiary Traced	<input type="radio"/>	Not Duplicate	<input type="radio"/>
Not Pensioner	<input type="radio"/>	Beneficiary Interested in SCG	<input type="radio"/>	Not Underage	<input type="radio"/>
Other(s) Please Specify					
Other Comments:					

Section D: Verified by (District/City/Municipality) Staff

Designation	Approved by SCDO-SAGE (District/City/Municipality)
Name:	Name:
Date : <u>DD / MM / YYYY</u>	
Signature:	<u>DD / MM / YYYY</u>

RTSU/PMU use only (data entry details)			
Completed by: Name..... Title..... Signature..... Date: DD / MM / YYYY			
RTSU/PMU Comments:			
<hr/> <div style="display: flex; justify-content: space-around;"> <div><input type="radio"/> Approved</div> <div><input type="radio"/> Rejected</div> <div><input type="radio"/> Pending</div> </div>			

SCG Reinstatement Form Serial No:

Date / /

Annex 6: SCG Appeals Form

SCG Appeal's FormDate DD / MM / YYYYAppeals Channel Parish/Ward Agent CDO SAGE Staff Senior CDO Hotline

Section A: Beneficiary Information

Appellant's Name (s)	Is Appellant a Beneficiary		Appeal level		
	<input type="radio"/> Yes <input type="radio"/> No		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
			SubCounty/ Division CDO	District/City/Municipality CDO	Programme
			Beneficiary NIN		
			<input type="checkbox"/>		
Contact Information for feedback	Is Phone for Beneficiary		Residential Information		
<input type="radio"/> 0	<input type="radio"/> Yes <input type="radio"/> No		District/City/Municipality		
			Sub county/Division		
			Parish/ward		
			Village/Cell		

Section B: Appeal Details

Reference of the Original Complaints form			
Reason for appeal			

Section C: Resolution

	District /City/Municipal	Programme (RTSU/PMU)
Findings		
Recommendations		
Resolution Status	<input type="radio"/> Resolved or Referred	<input type="radio"/> Resolved or Closed

Details of Receiver
Completed by: Name..... Title..... Signature..... Date: <u>DD / MM / YYYY</u>
RTSU/PMU use only (SAGEMIS data entry details)
Completed by: Name..... Title..... Signature..... Date: <u>DD / MM / YYYY</u>

Appeal Form serial no:

Date DD / MM / YYYY



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

The Expanding Social Protection Programme Management Unit

Ministry of Gender, Labour and Social Development

Plot 9. Lourdel Road. P. O. Box 28240. Kampala Uganda

Tel: +256 312 20 20 50/1 Email: esp@socialprotection.go.ug

Website: www.socialprotection.go.ug

Facebook: [Expanding-Social-Protection-Programme](#)

X:@ESPprogramme

