

Transparency International Rwanda

Complaint Management Policy and Procedures

February, 2025.

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1. Policy overview

1.1. Purpose

This Policy and Procedures provides guidance on the key concepts of the complaint management procedures by TI-Rwanda staff and those people who wish to make a complaint. This Policy and Procedures is intended to ensure all complaints are handled fairly, efficiently and effectively.

1.2. Scope

This Policy and Procedures applies to complaints about TI-Rwanda, its services and/or how complaints are handled, originating from inside or outside of TI-Rwanda. This includes, for example, complaints about:

- decisions made by employees of TI-Rwanda
- the conduct of employees of TI-Rwanda, including the quality of service provided
- policies, procedures and practices of TI-Rwanda.
- Unethical behavior of a supervisor on his/her subordinate

TI-Rwanda may not accept complaints relating to matters which have been previously dealt with or finalized, are outside its jurisdiction or which are vexatious or frivolous (as determined by the Executive Director).

1.3. Key features

This Policy and Procedures is based on several clear principles, including:

- **Commitment** - being open to complaints and viewing them as a means to enhance service delivery and improve products, services, practices and procedures.
- **Facilitation** – publicizing information about how and where complaints may be made.
- **Resourcing** – providing appropriate support and resources to employees to handle complaints, and empowering employees to implement TI-Rwanda’s Complaints Management Policy and Procedures as relevant to their role.
- **Learning** – regularly analyzing, reporting and reviewing the subject matter and outcomes of complaints to measure the quality of TI-Rwanda’s service, for continuous improvement.
- **Guidance** – TI-Rwanda’s Complaints Management Policy and Procedures provides clarity regarding how complaints will be received, recorded, managed and reported.

1.4. Key responsibilities

This Policy and Procedures specifies the responsibilities of Executive Director, Programme manager, Coordinators, Employees and Complainants. It also provides further guidance in case the issue would need Board of Directors involvement should the case is beyond the Executive Director’s capacity to handle the matter. In any case, the Board of Directors should be informed through the chairperson on the cases reported which involve TI-RW staff on one way or another.

1.5. Risk management

Complying with this Policy and Procedures will considerably reduce risks associated with:

- inefficient and untimely handling of complaints.
- dissatisfaction by clients with TI-Rwanda services.
- unfair, discourteous handling of complaints and breaches of complainant privacy.
- decisions made without transparency and objectivity.

1.6. Monitoring and review

Analysis and evaluation of complaints

The Programme Manager will provide a biannual complaints report to TI-Rwanda Executive Director. This report will highlight the performance of the complaint management procedures over the previous six months and will include (but is not limited to):

- number and nature of complaints received during the reporting period;
- number of complaints resolved during the reporting period;
- time taken to investigate complaints;
- issues arising from complaints;
- action to address systemic issues (if any);
- the number of requests received for external review of complaint handling;
- complainant satisfaction with TI-Rwanda's procedures for investigating complaints.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of services and make improvements.

Monitoring the complaint management procedures

The Programme Manager will review the complaint management procedures on an annual basis to ensure the policy's suitability for responding to and resolving complaints.

2. Policy Statement

TI-Rwanda is committed to providing services of the highest quality. Key to meeting this commitment is using feedback from those who use TI-Rwanda's services as opportunities to improve the quality of the services provided. Feedback can be in the form of a complaint.

A complaint is defined as an expression of dissatisfaction about TI-Rwanda, related to its services, policies, procedures, practices, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected.

TI-Rwanda is committed to ensuring that complaints received are handled in a manner which is fair, courteous and respects the privacy of the person making the complaint. Further, TI-Rwanda is committed to ensuring that reasons are provided for decisions made in relation to any complaint received.

TI-Rwanda is also committed to making available simple procedures and the provision of all reasonable assistance to those who choose to make a complaint.

3. Key responsibilities

3.1. Executive Director's responsibilities

TI-RWANDA Executive Director is responsible for:

- Promoting a culture that values complaints and their effective resolution.
- Establishing TI-Rwanda's Complaint Management Policy and Procedures.
- Ensuring complaints are effectively addressed in accordance with the complaint management procedures.
- Providing adequate support and direction to employees responsible for handling complaints.
- Regularly reviewing reports about complaint trends and issues arising from complaints.
- Encouraging employees to make recommendations for system improvements.
- Supporting recommendations for service and/or product improvements arising from analysis of complaint data.

3.2 Programme Manager responsibilities

The Programme Manager is responsible for:

- Oversighting complaint handling and ensuring complaints are investigated and dealt with in accordance with TI-Rwanda's Complaint Management Policy and Procedures.
- Ensuring a central Complaints Register is maintained for monitoring and tracking complaints, and reporting on actions and decisions.
- Ensuring the promotion of awareness of the complaint management procedures.
- Prompt notification to the Commissioner of any serious complaints.
- Annually reviewing the complaint management procedures to ensure the policy's suitability for responding to and resolving complaints.
- Reporting biannually to TI-Rwanda's Executive Director.

3.3. Project Coordinators responsibilities

Project Coordinators are responsible for:

- Understanding, complying with and managing individual complaints in terms of TI Rwanda's Complaint Management Policy and Procedures.
- Supporting and empowering employees to resolve complaints promptly and in accordance with the complaint management procedures;
- Minimize the need for escalation.
- Ensuring complaints are effectively addressed in accordance with this Policy and Procedures.
- Ensuring appropriate records are kept.

3.4. Employee responsibilities

Employees are responsible for:

- Understanding and complying with TI-Rwanda's Complaint Management Policy and Procedures.
- Dealing professionally, promptly and courteously with complaints and, where appropriate, providing assistance and information to people looking to make a complaint in accordance with this Policy.

3.5. Complainant responsibilities

Complainants are responsible for:

- Attempting to resolve the matter early by contacting the relevant employee directly to try to settle the issue or concern informally.
- If unable to resolve the matter informally, following TI-Rwanda's Complaint Management Policy and Procedures to lodge a formal complaint.

4. Complaint management procedures

TI-Rwanda's complaint management procedures are based on three approaches to complaints handling. They include informal resolution, formal resolution and external review.

4.1. Informal resolution

Wherever possible, complaints are best resolved early and informally by the employee who the complaint is being made about. This is the most effective and service-focused way to resolve a problem.

Some examples of these types of complaints might be:

- a response to correspondence or telephone call
- an inconsistency in a policy or procedure
- an error in records.

Employees are empowered to resolve these issues wherever possible. As such, they have authority to:

- obtain necessary information to assess the validity of the complaint;
- resolve issues or concerns;
- inform the complainant of the entitlement to lodge a formal complaint if the issue or concern remains unresolved.

If the matter is dealt with to the satisfaction of the complainant at this stage, the employee concerned must log a basic record of the informal resolution in Complaints Register held by the Programme Manager - per Appendix 1.

The basic record in the Complaints Register must contain the following information:

- complaint number
- complainant's contact information, if provided
- type of complaint ie related to employee, service, policy or procedure
- complainant satisfaction with the outcome.

4. 2. Formal resolution

Where informal resolution of a complaint is not possible the complainant may lodge a formal complaint with TI-Rwanda.

There are four basic steps to deal with a formal complaint which are - receiving, acknowledging, investigating and reporting.

Step 1. Lodging a complaint

Complaints can be received either orally or in writing. Wherever possible, complaints should be submitted in writing so that all aspects of the complaint can be accurately investigated. The Complaint Form at Appendix 2 provides an outline of the type of information that is required when lodging a complaint.

Written complaints can be mailed to:

Transparency International Rwanda
P.O. Box 6252
Kigali-Rwanda
Or to email: info@tirwanda.org

Oral complaints may be made by phoning TI-Rwanda Reception on +250 788 30 95 83 or 2641 (Toll free). TI-Rwanda Reception will take some basic details before referring the call to the Receiving Officer under Programme Manager.

The Receiving Officer will create a record of the complaint, and should:

- work through the Complaint Form with the complainant, listening carefully to document the complaint as dictated;
- provide further information about the complaint management procedures;
- have the complainant sign the Complaint Form (where possible) or acknowledge the complaint details;
- provide the complainant with a copy of the Form;
- refer the record of complaint to the Programme Manager.

Anonymous complaints

While anonymous complaints are not encouraged, they are accepted. They may be lodged either in writing or accepted by an employee as an oral statement. Complainants are encouraged to provide as much information as possible which may be of assistance when assessing the complaint. It should, however, be noted that an anonymous complaint might be more difficult to investigate as, for example, further details of the circumstances relating to the complaint might be difficult to obtain, and it will be difficult to provide feedback on the complaint.

Providing assistance

TI-Rwanda will provide all reasonable assistance to those who need help to communicate in relation to the complaint. Assistance may include, for example, access to an interpreter service or agreement to a personal interview during which the details of the complaint can be written down on the complainant's behalf.

Step 2. Registering, allocating and acknowledging a complaint

Registering a complaint

All formal complaints must be recorded in the Complaints Register held by the Programme Manager. The Programme Manager will be responsible for maintaining the Complaints Register per Appendix 1.

The register must contain the following information:

- complaint number;
- complainant's contact information, if provided;
- type of complaint ie related to employee, service, policy or procedure;
- name of investigating officer assigned to manage the complaint;
- time taken to investigate complaint;
- outcome of complaint;
- action recommended to address systemic issues (if any);
- complainant satisfaction with the outcome.

To maintain confidentiality, access to the Complaints Register and all associated documents (both electronic and paper based) will be restricted to the Programme Manager, the investigating officers and other officers approved by the Programme Manager.

Allocating a complaint

Once a complaint is lodged, the Programme Manager will undertake a review to ensure the complaint:

- has not been previously dealt with or finalized
- is within the Policy's jurisdiction
- is not vexatious or frivolous.

The Programme Manager will then consider how to allocate the complaint, and will either:

- refer the complaint to the appropriate member of TI-Rwanda Executive Director; or
- refer the complaint to the Chairperson of the Board of TI-Rwanda if it is not appropriate to allocate the complaint to TI-Rwanda Executive Director, for example:
 - there may be a potential conflict of interest
 - the complaint relates to TI-Rwanda Executive Director, or
 - the complainant requests it; or
 - engage someone to investigate the complaint.

If the complainant is referred to the Chairperson of the Board of TI-Rwanda, she/he will be responsible for:

- nominating the investigating officer; and
- ensuring the complaint is managed fairly, reasonably and within an appropriate timeframe (refer Step 3 – Resolution timeframes).

In all cases the Programme Manager is responsible for the overall monitoring of an internal reviews progress and ensuring the complainant receives a response/decision within 10 days, or otherwise receives an explanation as to when a response will be provided.

Acknowledging a complaint

Complaints should be acknowledged within one working day of receipt of the complaint.

The acknowledgment should:

- reassure the complainant that the complaint is valued
- request any further information that is considered necessary to investigate the complaint
- outline how the complaint will be managed, including an estimated timeframe for resolution
- establish how progress reports will be provided, if necessary
- provide contact details for the investigating officer.

Step 3. Investigating a complaint

Conducting an investigation

The investigation process must be objective, reasonable and conducted in good faith. Decisions must be made on the weight of evidence and on the balance of probabilities.

Investigating a complaint may include:

- clarifying the details provided in a complaint
- identifying actions taken to resolve the issue before the complaint was lodged
- analysing information from relevant file notes, correspondence and/or other sources
- reviewing details of the complaint
- reviewing documentation submitted by the complainant
- reviewing previous administrative decisions or actions
- interviewing complainants, employees and/or other individuals involved in the complaint
- reviewing relevant policies, procedures, practices and/or legislation
- reviewing previous complaints about the same issue.

A Case Management Form is provided at Appendix 3 to assist investigating officers. This can be used to record and track the complaint process.

Resolution timeframes

Complaints will be investigated as promptly as possible. Complaints should normally be resolved within 10 days. However, TI-Rwanda recognises that complaints can be sensitive and complex and may require detailed investigation. Therefore, the complexity of, and the resources available for, an investigation into a more complex issue will result in more time being taken to finalise a complaint. In these circumstances, the rationale for the extended time for resolving the complaint must be explained to the Programme Manager, as well as communicated to the complainant, who will be kept informed on a regular basis of progress on the resolution of the complaint.

Record keeping

The investigating officer will be responsible for ensuring complete and accurate recording of all material relating to an investigation into a complaint.

Details of each investigation should be contained within a discrete confidential complaint file, which should contain all correspondence, file notes of telephone conversations, interviews and findings from investigations, recommendations and internal approvals. The file should also contain evidence of the steps taken to investigate the complaint including a summary of actions in respect of recommendations (if any) made.

To maintain confidentiality, access to information filed about a complaint (both electronic and paper based) should be restricted to the Programme Manager, the investigating officers and other officers approved by the Programme Manager.

Procedural fairness

A decision that directly affects the rights or interests of a person or organisation must be made in accordance with the principles of procedural fairness. A decision maker is required to follow a fair decision-making process, complying with two rules:

- **the rule against bias**, which is that a decision-maker should have no personal interest in the matter to be decided, have no bias as to the outcome and act in good faith throughout the process. Care should also be exercised to exclude perceived bias from the process.
- **the hearing rule**, which is that the decision-maker must ensure the affected person is notified that a decision may be made, and is given a reasonable opportunity to express their views before that occurs.

TI-Rwanda will apply procedural fairness in its handling of complaints made in accordance with this Policy and Procedures. As set out in Step 2, TI-Rwanda will take steps to identify and manage conflicts of interest when allocating the investigating officer. The decision-maker on the complaint

(which includes the investigating officer and Programme Manager) will approach each decision with an open mind and act in good faith throughout the complaint handling process.

TI-Rwanda will observe the hearing rule through the following steps:

- it will acknowledge the complaint received from a complainant
- the investigating officer will present preliminary findings to the complainant and provide the complainant with a reasonable opportunity to respond before making a decision
- the decision maker will consider any response by the complainant before making a decision
- the decision maker will provide the complainant with reasons for their decision
- if a complainant is not satisfied with the outcome of a complaint, the complainant will be advised of their right to seek external review.

Outcome of an investigation

Following consideration of the complaint and any investigation into the issues raised, the investigating officer will provide TI-Rwanda Executive Director with a written report, detailing the findings and making recommendations regarding appropriate action and/or system improvements, as appropriate.

Outcomes that may result from an investigation may include, but are not limited to:

- varying a decision
- a written/verbal apology
- an explanation
- changes to a service provided by TI-Rwanda
- a review of policies/procedures/practices and changes to those policies/procedures/practices
- staff training
- disciplinary action.

In some circumstances, no further action on a complaint may be recommended. The rationale for this course of action may include:

- the matter has been investigated by TI-Rwanda and it is considered that all actions to address the complaint have been satisfactorily completed
- the matter is currently being managed by an external organization/institution
- the matter has already been adequately managed by an external agency

An Investigation Report template is provided at Appendix 4.

Step 4. Advising the complainant

At the conclusion of the investigation, written correspondence must be provided to the complainant outlining the preliminary key findings and/or recommendations made concerning the complaint, and offering the complainant an option to respond.

Following this process, a written response setting out the final outcome must be drafted by the investigating officer and signed by the Programme Manager before forwarding to the complainant.

The written response should:

- provide the outcome of the complaint and any action to be taken arising out of the complaint
- the reasons for any decisions that have been made
- any remedy or resolution that has been offered, and
- any options for review that may be available to the complainant, such as an external review.

Closing the complaint

At the time of closing the complaint, the investigating officer will update the Complaints Register with the following:

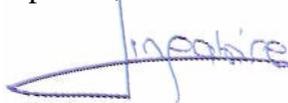
- steps taken to address the complaint
- the outcome of the complaint, and
- any undertakings or follow up action required.

4.3. External review

If a complainant is not satisfied with the outcome of the investigation by TI-Rwanda, they can seek an external review of their complaint.

This policy has been reviewed and approved during Transparency International's Board Meeting of February 10th, 2025

Mrs. Ingabire Marie Immaculée
Chairperson, Board of Directors



Mr. Apollinaire Mupiganyi
Executive Director



Appendix 2. Complaint form

Complaint Form	
reference number:	
Information for complainants	
<p>Before you lodge a formal complaint, ensure you have contacted the relevant employee directly and attempted to resolve the issue or concern informally.</p> <p>A complaint should only be lodged if you have been unable to resolve your issue or concern informally.</p> <p>You may be contacted and asked to provide additional information to support your complaint.</p>	
Personal details	
Title	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Ms <input type="checkbox"/> Miss <input type="checkbox"/> Other
Family name	
Given name	
Contact details	
Address	Postcode
Email address	
Phone number	
Mobile phone number	
Preferred contact method	<input type="checkbox"/> Mobile <input type="checkbox"/> Phone <input type="checkbox"/> Letter <input type="checkbox"/> Email
Complaints details	
Have you attempted to resolve the complaint informally?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, provide details (eg when and with whom)
Have you lodged a complaint about this issue before?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, when
Have you lodged your complaint with any other organization/institution?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, to whom:

Complaint summary

When it happened

Where it happened

Who was involved

What happened (details of your complaint)?

What would you like to happen to resolve your complaint?

Attach any documentation that supports your complaint

Acknowledgement

All the information provided above is true and correct to the best of my knowledge.

Signature

Date

Privacy notice

The personal information provided by you on this form and any associated documents will be used by TI-Rwanda to assist you with your complaint and not for any other purpose. The information will only be disclosed to persons or agencies outside TI-Rwanda in accordance with the *Law n° 058/2021 of 13/10/2021* relating to the protection of personal data and privacy or as otherwise required or authorised by law. The provision of your information is voluntary. It will be stored securely. You may gain access to and correct your personal information by contacting TI-Rwanda, Phone : +250 788 30 95 83 or 2641 (Toll free), Email: info@tirwanda.org

What happens next

Once your complaint has been received by TI-Rwanda it will be allocated to an investigating officer. The investigating officer will acknowledge receipt of your complaint within one working day. Complaints will be investigated as promptly as possible. Once the investigation is completed you will be advised in writing of the outcome.

Appendix 3. Case management form

Formal complaint - Case management form		
Reference Number		
Investigating Officer		
General information		
Name of complainant		
Is the complaint being handled by the appropriate person?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If no, has the complaint been referred to the appropriate person?	Yes <input type="checkbox"/> Date:	No <input type="checkbox"/> (If no, why not?)
Notes		
Complaint lodgment and acknowledgement		
Date received		
Complaint lodged	<input type="checkbox"/> In person <input type="checkbox"/> In writing <input type="checkbox"/> Verbally	
Has complaint been registered on the Complaints Register?	<input type="checkbox"/> Yes	<input type="checkbox"/> No (If no, why not?)
Nature of complaint	<input type="checkbox"/> Service delivery	<input type="checkbox"/> Staff conduct
	<input type="checkbox"/> Administrative decision	<input type="checkbox"/> Policy/procedure/practice
	<input type="checkbox"/> Other (specify)	
Date acknowledged		
Has complainant been advised of the complaint management procedures?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Notes		

Investigation		
Proposed timeframe for resolution	<input type="checkbox"/> Standard (ie within 10 working days)	<input type="checkbox"/> Complex (ie more than 30 working days)
		<input type="checkbox"/> Due date

Has sufficient information been provided to investigate?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If no, what additional information is required?		
Date complainant notified for additional information		
Investigation strategy (more than one box can be ticked)	<input type="checkbox"/> Meeting(s) with complainant	<input type="checkbox"/> Internal review
	<input type="checkbox"/> Review of available material	<input type="checkbox"/> Investigation
	<input type="checkbox"/> Telephone interview(s) with complainant	<input type="checkbox"/> Other (specify)
Key stages of investigation (eg interview date(s))		
Recommendation (more than one box can be ticked)	<input type="checkbox"/> Written/verbal apology	<input type="checkbox"/> Explanation
	<input type="checkbox"/> Policy/procedure review	<input type="checkbox"/> Change to service
	<input type="checkbox"/> Staff training	<input type="checkbox"/> Other (specify)
Decision		
Notification		
Date decision communicated to complainant: (complainant should always be notified in writing, when possible)		
Was the complaint justified?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Partially
Was the complainant satisfied with the outcome of the complaint?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If no, has complainant been notified of their right to an external review?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Has the Complaint Register been updated?	<input type="checkbox"/> Yes	<input type="checkbox"/> No (If no, why not?)
Notes		

Appendix 4. Investigation report

Note – this Template can be adapted by the Investigating Officer to meet specific needs

Investigation Report

Name of Complainant	
Reference Number	
Name of Investigating Officer	
Date of Decision	
Decision	

Details of Complaint

[summarise the complaint]

Investigation process

[describe what you did to investigate the complaint, eg what documents were collected, who you spoke to, etc]

Review of complaint

[set out your response to each element of the complaint, giving your reasoning, preferably referencing your reasons by reference to evidence that you collected]

Decision

[say whether you uphold, partially uphold, or reject the complaint; if there are several aspects to the complaint, indicate your decision for each aspect but reach an overall decision]

Proposed resolution

[if you upheld or partially upheld the decision, set out the proposed resolution, eg apology, explanation, policy/procedure review, etc; it will be helpful if you indicate why you think this/these resolution(s) are appropriate]
