



1. Introduction – The value of complaints and our commitment to good complaint handling

TLM-Nigeria (TLMN) recognises the importance and value of listening and responding to concerns and complaints. We are committed to achieving the highest standard we can in every area of our work and to continuous improvement. This applies especially to delivery of services, seeking donations and accountability to stakeholders generally.

Receiving concerns and complaints is one of the most important ways of learning what we need to do to improve our work.

This policy applies to all our people – employees, Trustees and volunteers – and they are familiarised with it. Those with particular relevant responsibilities are trained in its application.

We make clear the value we place on receiving concerns and complaints in all relevant communications. We advise how a copy of this policy may be obtained and we provide clear information on how complaints may be made.

2. Guiding principles for Our Policy

We have adopted the following principles for our complaint policy and procedures.

Principle 1: Visibility.

We will clearly publicise information about how and where to complain

Principle 2: Accessibility.

We will ensure that our complaint handling process is as accessible as we can practically make it to all complainants.

Principle 3: Responsiveness.

We will respond to a complaint according to our predetermined timeframes.

Principle 4: Objectivity.

We will address all complaints in an equitable, fair and unbiased manner using evidence submitted by both the complainant and our personnel through the complaint handling process.

Principle 5: Charges.

Access to the complaint handling process is free of charge to complainants

Principle 6: Confidentiality.

We will observe strict confidentiality in complaint handling.

Principle 7: Complainant focused approach.

The interests of our complainants are foremost in our approach to complaint handling.

Principle 8: Accountability.

We will ensure that accountability for and reporting on the actions and decisions with respect to complaint handling is clearly established.

Principle 9: Continual improvement.

Continual improvement of the complaint handling process and the quality of services is one of our permanent objectives.

3. Definitions we use

- **Complaint** means an expression of dissatisfaction made to an organisation, related to its products or services, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected.
- **Complainant** means a person, organisation or its representative, making a complaint.
- **Inquiry** means a request for information or an explanation.
- **Feedback** means opinions, comments, suggestions and expressions of interest in the products or the complaint handling process.
- **Stakeholder or interested party** means a person or group having an interest in the performance or success of the organisation.

4. Scope of Our policy

- This Policy is intended to apply to any complaint, regardless of who makes it.
- We will accept complaints relating to our paid staff, our volunteers, our partners, our contracted service providers or anyone else acting on our behalf.
- A complaint may be made by a person to whom we deliver services or goods or who is affected by our services or goods, a partner, a local organisation with which we work, our staff, volunteers, donors or a member of the public.
- Anonymous complaints can be made, but our ability to investigate them may be limited because of this.

5. Educating our organisation on our complaint policy and training relevant personnel

Our Complaints Policy has been distributed to all our paid staff, Trustees, our volunteers, our partners, our contracted service providers and all others acting on our behalf. We require all those who may be involved in any way with a complaint to formally signify their commitment to this policy.

To familiarise them with this policy we run induction programs for our Trustees and all relevant personnel. Personnel directly involved in complaint handling are fully trained in all aspects of this policy and its implementation. We take special care to train our field personnel to encourage, receive and handle complaints taking account of language issues and cultural sensitivities.

6. Publicising Our Policy

We make clear the value we place on receiving concerns and complaints in all relevant communications. We use the word “complaint” or its equivalent in relevant languages other than English. Our website opening page has a placement with the word complaint linking to this policy and information on how to make a complaint. Where literacy is a constraint we will orally invite expressions of concern and complaint on a regular basis. We will take care to give this invitation in a way that is culturally appropriate recognising that in some cultures people require greater encouragement to make a complaint. We will take special care to facilitate complaints from vulnerable populations including children and marginalised groups. If required we will make use of pictorial means of communication.

We ensure that making a complaint to us is as easy as possible. We will take complaints orally in person, over the phone and by any written means. We will do our very best to assist a complainant to put their complaint in writing or to write it down ourselves as faithfully as we can.

All relevant communications explain this and explain our procedures for handling complaints including: (Note - e.g. website, newsletters, annual report, partnership agreements, staff policies)

- where or to whom complaints can be made
- information to be provided by the complainant
- the process for handling complaints
- time periods associated with various stages in the process
- the complainant's options for remedy, including external means
- how the complainant can obtain feedback on the status of the complaint

In addition to the general reviews of our complaint handling specified in section 17 we will monitor how effectively we are publicising our complaints policy on a continuing basis and make necessary improvements in its communication.

7. Where and How Complaints may be made

We are able to receive complaints orally in person (to the *National Director*) or by telephone (08039495853 – *Chairman, TLM Nigeria Audit Committee*) and in writing by post (*P.M.B 494, Area 10, Garki, FCT - Abuja*), email (*tlmn.safeguard@gmail.com*) or online via our website. Where complaints are made orally we will ensure our write up of the complaint contains all the information the complainant wishes to provide.

Complaints may be made by a friend or advocate of the complainant on their behalf.

Where appropriate, for some projects/programmes we may establish complaint committees involving representatives from partner organisations and members of communities we are serving.

Where appropriate we may utilise complaint/suggestion boxes. We recognise that in some circumstances complainants may wish to remain anonymous. Because such complaints can alert us to problems that need fixing we will accept them though clearly it may not be possible to provide a remedy to an individual.

8. How we will handle complaints

When we take an oral complaint we will:

- Identify ourselves, listen, record details, and determine what the complainant wants;
- Confirm that we have understood and received the details;
- Show empathy for the complainant, but not attempt to take sides, lay blame, or become defensive;

For all complaints we will:

- Seek from the complainant the outcome/s they are expecting;
- Make an initial assessment of the severity of the complaint and the urgency of action
- Clearly explain to the client the course of action that will follow:
 - if the complaint is out of our jurisdiction
 - if we may exercise a discretion not to investigate

- if preliminary enquiries need to be made, or further consideration needs to be given
- if the complaint is to be investigated
- We will not create false expectations, but assure the client that the complaint will receive full attention;
- Give an estimated timeframe or, if that is not possible, a date by which we will contact them again;
- Check whether the client is satisfied with the proposed action and, if not, advise them of alternatives.
- Ensure that the complaint is appropriately acknowledged
- Follow up where necessary, and monitor whether the client is satisfied.
- We will register all complaints (see section 15)

Where appropriate we will ensure that personnel working in communities we serve have all necessary training to encourage and handle inquiries, expressions of concern and making of complaints so as to take account of cultural and gender sensitivities and to ensure that cases involving children are appropriately handled.

We will ensure that a complainant is not required to express their complaint to a person implicated in their complaint. We will also ensure that a person implicated in a complaint is not involved in any way with the handling of that complaint.

Initial assessment of complaint

We will first assess whether there is more than one issue raised in the complaint and whether each needs to be separately addressed.

To determine how a complaint should be managed, we will assess it in terms of the following criteria:

- a) severity;
- b) health (including mental health) and safety implications;
- c) financial implications for the complainant or others
- c) complexity;
- d) impact on the individual, public and organisation;
- e) potential to escalate;
- f) systemic implications; and
- g) the need for, and possibility of immediate action.

If we assess the complaint as significant in terms of one or more of these criteria we will classify the complaint accordingly.

9. Inquiries, complaints and jurisdiction

We will endeavour to deal immediately with inquiries and complaints which are made orally by telephone or in person, that is during the initial phone call or meeting. However, as far as possible, we will ensure that the inquirer or complainant is completely satisfied with the information and or resolution provided.

On receipt of a complaint we will also attempt to determine expeditiously whether investigation is required or not depending on jurisdictional questions and whether the complaint is ill conceived.

If the complainant disputes an assessment that a complaint should not be investigated, the member of staff handling the complaint will refer it to a more senior colleague for review. If such a dispute is unresolvable we will refer the complainant to TLMN Management and then if still not resolved, it will be referred to the TLMN Board Audit Committee.

10. How we will investigate complaints

We will make every reasonable effort to investigate all the relevant circumstances and information surrounding a complaint. The level of investigation will be commensurate with the seriousness and frequency of the complaint.

11. Our timeframes

We will acknowledge written complaints within 5 days of receipt.

We will acknowledge oral complaints immediately.

We will aim to resolve complaints as quickly as possible and within 30 days unless there are exceptional circumstances. If a complaint is not resolved within 30 days we will inform the complainant of progress and keep them informed of progress every two weeks.

12. How we will respond to and close a complaint

Our National Director or a senior manager delegated by him/her will normally make the decision on a complaint that has required investigation (that is not a minor complaint). Decisions on serious complaints may be referred to our governing board.

We will communicate our decision on a complaint as soon as is practical. Our communication will be in writing in the appropriate language by email and/or post. However, where appropriate such as in the case of a complaint being made by a local community member (in the field) we will also communicate our decision orally and again in the appropriate language.

We will encourage the complainant to respond and advise whether or not they are satisfied with our decision. In our decision we will advise that if a complainant is not satisfied we will be prepared to consider any additional information they may provide and to review our decision.

In all cases we will advise that the complaint may be referred to the TLMN Board Audit Committee. We will provide all necessary information for referral to the TLMN Board Audit Committee and offer to assist in referral.

13. How we will learn from complaints

We will ensure that all relevant personnel are informed of the outcomes of complaints and the implications for our services, goods, procedures and processes.

We will take all required remedial action. We will be prepared to change the way in which we operate and improve or undertake further training of staff. Where needed we will counsel or discipline staff or volunteers. Where appropriate we will consult and take advice from the TLMN Board Audit Committee and/or other relevant regulatory/enforcement authorities.

14. Confidentiality

We will not reveal a complainant's name or personal details to anyone in or outside our organisation other than staff involved in handling the complaint without obtaining the complainant's permission.

15. Complaint data

We will register all inquiries and complaints. We will ensure that the following information is contained in written complaints and if not, and in the case of oral complaints, record this information ourselves:

- date of receipt
- a description of the complaint and relevant supporting data;
- the requested remedy;
- the service(s) and/or good(s) and/or practice or procedure complained about;
- the due date for a response;
- immediate action taken (if any) to resolve the complaint

16. Reporting about complaints

We will immediately escalate complex and/or major complaints (see 6) to our CEO or his/her delegate.

All complaints will be reported at our regular monthly Management Team meetings and our governing board meetings. Minor complaints will be reported in summary form. Major complaints will be reported in detail.

An analysis will be included in the complaints report provided with the complaints data.

Our Annual Report will provide de-identified information on complaints.

17. Continuous improvement

On a continuing basis we will monitor the effectiveness of our complaint handling and make improvements as appropriate.

We will—

- maintain data collection on complaints for the purpose of identifying trends for the purpose of enhancing information management and service provided;
- keep abreast of best practices (both locally and overseas) regarding complaint handling;
- foster a consumer/client-focused approach;
- undertake specific training and retraining of staff to foster better complaint handling practices;
- encourage innovation in complaint handling development; and
- recognise and reward exemplary complaint handling behaviour.
- conduct an internal review of the effectiveness of our complaint handling every first quarter of the year.

18. Policy Review

This Policy will be reviewed in 5 years.

Revision History

Version	Date	Author	Summary
1.0	11 September 2018	Sunday Udo	New draft created for next revision

Document Approval

Version	Date	Approved by
1.0	November 8, 2018	TLM-Nigeria Board