



Kenya School of Government

Staff Retirement Benefit Scheme

Customer Feedback Policy and Procedure Manual

2023-2025

APPROVAL OF THIS CUSTOMER FEEDBACK POLICY AND PROCEDURE MANUAL

The Kenya School of Government Staff Retirement Benefit Scheme Board of Trustees deliberated on and adopted this Customer Feedback Policy and Procedure Manual in its meeting of The policy was approved for use with effect from

The Board of Trustees will review the policy from time to time and in any case within a period of three years. All amendments will be communicated in writing. This will provide assurance that the Whistle Blowing Policy will remain consistent with the Scheme's mandate, objectives, roles and responsibilities.



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Staff Retirement Benefit Scheme



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AMENDMENT SHEET

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TABLE OF CONTENTS

ABBREVIATIONS.....	5
DEFINITION OF TERMS.....	6
SECTION ONE.....	7
INTRODUCTION	7
1.1 Mandate of the Scheme.....	7
1.2 Vision	8
1.3 Mission Statement.....	8
1.4 Core Values	8
1.5 Key Result Areas and Strategic Objectives.....	8
1.5.1 Key Result Areas	8
1.5.2 Strategic Objectives.....	8
1.6 Policy Statement.....	9
1.7 Purpose and Application of the Policy	9
1.7.1 Purpose.....	9
1.7.2 Application	10
1.8 Legislation and Policies	10
SECTION TWO.....	12
GUIDING PRINCIPLES, RESPONSIBILITIES AND FEEDBACK PROCEDURES	12
2.1 Introduction.....	12
2.2 Guiding Principles.....	12
2.2.1 Visibility and accessibility.....	12
2.2.2 Objectivity and Fairness.....	12
2.2.3 Transparency, Accessibility and Accountability.....	13
2.2.4 Responsiveness	13
2.2.5 Professionalism.....	14
2.2.6 Confidentiality.....	14
2.2.7 Customer-Centric Approach	14
2.2.8 Charges	14
2.3 Responsibilities	14
2.4 Complaint/Compliment Handling Procedure.....	15
2.5 Complaints Management Tiers	17
2.6 Unreasonable or vexatious complaints	18
SECTION THREE.....	1
INSTITUTIONAL FRAMEWORK.....	1
3.1 Introduction	1

3.2 Board of Trustees.....	1
3.3 Trust Secretary.....	1
3.4 Customer Service Officer.....	2
SECTION FOUR.....	3
IMPLEMENTATION, MONITORING AND REVIEW.....	3
4.1 Implementation.....	3
4.2 Administration, Monitoring and Evaluation of the Policy.....	3
4.3 Review of the Policy	3
4.4 Independent Assurance	4

ABBREVIATIONS

KSG-SRBS	Kenya School of Government Staff Retirement Benefit Scheme
RBA	Retirement Benefits Authority
TCF	Treating Customers Fairly (TCF)

DEFINITION OF TERMS

S/NO	Terms	Definition
1.	Acknowledgement	A notification to a client that their compliment or complai has been received, and informing them of the process ar anticipated time of resolution
2.	Complaint	Statement that a situation is unsatisfactory or unacceptabl
3.	Compliment	Expression of esteem, respect, affection or admiration
4.	Customer	Recipient of good, service, product or an idea from tl Scheme
5.	Members	Active, dormant and deferred members
6.	Partners	Individuals or institutions with whom KSG-SRBS has contractual agreement to deliver all or part of a project
7.	Scheme	Kenya School of Government Staff Retirement Benefi Scheme
8.	Staff	All persons who have signed a contract with KSG-SRBS 1 work in any capacity at any given time (<i>on regular or tempora terms, interns, volunteers, and consultants</i>)

SECTION ONE

INTRODUCTION

1.1 Mandate of the Scheme

- i. This Policy and Procedure Manual will aid realization of the mandate of the Scheme through effective management of members' fund.
- ii. Kenya School of Government Staff Retirement Benefits Scheme (*Formerly Known as Kenya Institute of Administration Staff Retirement Benefits Scheme*) was established by a Trust Deed dated 15th July 2003 between the Founder (*the former Kenya Institute of Administration*) and the Trustees at the time. The Trust Deed has since been amended as follows:
 - a. By a supplemental trust deed dated December 2008 made between the Founder and the Trustees at the time the Original Trust Deed was amended
 - b. By a revised Trust Deed and Rules dated 1st December 2010 made between the Founder and the Trustees at the time the Original Trust Deed was amended
 - c. By a deed of amendment dated 9th December 2015 made between the Sponsor and the Trustees at the time the Original Trust Deed was amended
 - d. By a deed of amendment dated 9th May 2022 made between the Sponsor and the Trustees at the time the Original Trust Deed was amended
- iii. The Scheme is constituted in Kenya as a Defined Contribution Scheme and the main purpose of the Scheme is the provision of pension and other retirement benefits for Members upon their retirement from the Sponsor's service and relief for the dependants of deceased Members

1.2 Vision

Secure, prosperous and sustainable retirement life

1.3 Mission Statement

To prudently manage the scheme towards providing quality life to our members and beneficiaries of the Scheme.

1.4 Core Values

Kenya School of Government Staff Retirement Benefit Scheme (KSG-SRBS) will uphold the following values as the guiding principles for its operations:

- i. **Hope:** Providing confidence to members in our ability to persevere and to achieve goals
- ii. **Accountability:** Each of us is responsible for our words, our actions, and our results
- iii. **Professionalism:** We shall endeavor to demonstrate reliability, competence and expertise in all our dealings
- iv. **Integrity:** Being honest and showing a consistent and uncompromising adherence to strong moral and ethical principles and values

1.5 Key Result Areas and Strategic Objectives

1.5.1 Key Result Areas

The Scheme has identified the following Key Result Areas (KRAs):

- i. Sustainability and Adequacy
- ii. Member Satisfaction
- iii. Strengthen Governance Framework
- iv. Capacity Development

1.5.2 Strategic Objectives

The strategic objectives in the KSG-SRBS Strategic Plan, 2021-2026 are:

- i. Ensure financial sustainability of the scheme
- ii. Enhance Member Engagement and Satisfaction
- iii. Enhance Governance Framework and Operational Excellence
- iv. Strengthen Internal Stakeholders through Capacity Development

1.6 Policy Statement

- i. The Kenya School of Government Staff Retirement Benefit Scheme (KSG-SRBS) acknowledges everyone's right to express their opinion about our services. We will provide our members and other stakeholders with the opportunity to influence the way the Scheme works through meaningful engagement, listening and responding to feedback, and protecting their confidentiality and privacy.
- ii. KSG-SRBS shall at all times provide a quality service and working in an open and accountable way that builds trust and respect. We shall improve our service by listening and responding to the views of our members, service providers and stakeholders, and in particular by responding positively to complaints, and by putting mistakes right.
- iii. KSG-SRBS is committed to ensuring that its service is of the highest quality. We believe that through effective management and investigation of comments, compliments and complaints, we can be a learning institution to achieve high quality work and continuous improvement as a Scheme.

1.7 Purpose and Application of the Policy

1.7.1 Purpose

This policy is designed to ensure:

- i. KSG-SRBS has an effective and robust customer feedback system in place to manage complaints, suggestions and compliments and that we comply with any legal requirements, regulations, guidelines and best practice.
- ii. Our complaints and compliments process is fair and transparent and does not discriminate directly or indirectly and that the complainant feels free to complain without fear of reprisals and is treated with courtesy, respect and compassion.

- iii. All complaints and suggestions are promptly addressed, resolved and shared within the agreed timescales to learn and improve service quality and delivery.
- iv. Members, service providers and staff within KSG-SRBS understand their roles and responsibilities with regard to handling complaints, suggestions and compliments.

1.7.2 Application

- i. The policy applies to Board of Trustees, staff, members, partners, suppliers, contractors, clients, members of the public and any other relevant stakeholders.
- ii. KSG-SRBS recognizes the importance of a well-managed complaints handling process as part of providing quality customer service. The Scheme is therefore accountable for its actions and decisions. Members, service providers and other external parties have a right to complain about us and seek remedy for decisions that affect them.
- iii. It has been developed to support and expand the Scheme's Customer Service Delivery Charter. It sets out principles the Scheme has adopted for the management of feedback, compliments, suggestions or complaints - received in relation to the services provided and the experiences of the delivery of those services.
- iv. It describes the procedures to be followed to address the feedback stated in (iii) above.

1.8 Legislation and Policies

- i. The Customer Feedback Policy and Procedure manual is formulated in compliance with the relevant laws, regulations and procedures.
- ii. The use of the Policy and procedure manual should take cognizance of policy pronouncements from the Government.

- iii. Where any policy, rules, regulations, procedures or provisions of the Policy is in conflict with the applicable Kenyan Laws and other statutory requirements, the latter shall prevail. Where necessary, the Trust Secretary shall issue clarifications in writing.
- iv. Reference was mainly made to the following legal, policies and institutional documents during the preparation of this manual:
 - a. Constitution of Kenya, 2010
 - b. Commission on Administrative Justice Act, 2011
 - c. Access to Information Act 2016
 - d. The Fair Administrative Action Act No. 4 of 2015
 - e. Public Officer Ethics Act, No. 4 of 2003
 - f. Employment Act of 2007
 - g. Public Audit Act No. 34 of 2015
 - h. Leadership and Integrity Act No. 19 of 2012
 - i. Kenya School of Government Act of Parliament No. 9. of 2012
 - j. Retirement Benefits Authority Act.
 - k. Scheme Trust Deed and Rules
 - l. Public Service Code of Conduct
 - m. KSG Code of Conduct and Ethics

SECTION TWO

GUIDING PRINCIPLES, RESPONSIBILITIES AND FEEDBACK PROCEDURES

2.1 Introduction

- i. KSG-SRBS recognizes that it is the responsibility of Board of Trustees and Secretariat to provide quality services to members, service providers and any other relevant stakeholders.
- ii. The Scheme shall therefore strive to provide a responsive, efficient, effective and fair complaint management system.

2.2 Guiding Principles

This policy is guided by the following principles:

2.2.1 Visibility and accessibility

The Scheme feedback management system shall:

- a. Be visible and accessible to individuals
- b. Explain how and where to make a compliment or complaint, including an anonymous complaint
- c. Consider specific needs of the individual or barriers they may experience
- d. Explain alternative complaint resolution pathways when the complaint is first lodged and when it is closed
- e. Explain how the Scheme will manage a complaint and the expected timeframe for resolution
- f. Support individuals so they can identify and seek their preferred outcome.

2.2.2 Objectivity and Fairness

- a. The Scheme recognizes the need to be fair when dealing with complaints. KSG-SRBS shall address all complaints on merit, facts and provide

appropriate remedies when complaints are lodged. The Scheme will ensure our core values are reflected in all dealings with customers

- b. Each complaint shall be addressed in an equitable, objective and unbiased manner through the complaints-handling process.

2.2.3 Transparency, Accessibility and Accountability

- a. Our policy shall be readily available to all. Internally, it will be distributed to all stakeholders via email and placed on the intranet where all members and stakeholders can access it at any time.
- b. The Policy shall become part of the induction package when a new member and staff join the Scheme.
- c. Periodic reminders shall be made and retraining conducted on the Policy. Externally, the Policy shall be placed on the scheme website. Hard copies shall be made available upon request.
- d. The Board of Trustees and Secretariat shall accept responsibility for effective complaints handling
- e. The Secretariat shall ensure that, where appropriate, issues raised in the complaints handling process are reflected in scheme employee performance evaluation.

2.2.4 Responsiveness

The feedback management system shall:

- a. Promote client rights, particularly those with special needs, so they can actively participate in the compliments and complaints process
- b. Inform and train members and staff to use the compliment and complaint management system
- c. Support the complainant to seek the most appropriate resolution
- d. Ensure there is clarity about the requested outcome
- e. Provide a respectful, valuing and informative acknowledgement
- f. Actively listen, empathize and acknowledge when the service was not the best it could have been
- g. Monitor timeframes for resolution

- h. Communicate with all relevant parties about the progress to resolve the complaint.

2.2.5 Professionalism

- a. All information received from a complainant shall be treated with utmost objectivity.
- b. The Scheme regards feedback as an important aspect in the process of communication. The highest standards of professionalism are expected from all our members and staff in the process of handling complaints.

2.2.6 Confidentiality

- a. The Scheme encourages complainants to make full disclosure and provide full contact information when lodging complaints.
- b. The Scheme shall not disclose the identity of complainant(s), should they request that their details remain confidential at the time when the complaint is lodged.

2.2.7 Customer-Centric Approach

- a. All members, staff and service providers of the Scheme, including the members of the Board of Trustees, the Trust Secretary and the secretariat, are committed to efficient and fair resolution of complaints.
- b. The Trustees actively seek feedback from stakeholders on a regular basis and acknowledge a there right to complain.

2.2.8 Charges

There shall be no charge to the complainant for making a complaint

2.3 Responsibilities

Trustees' responsibility will be to:

- a. Acknowledge the formal complaint in writing
- b. Aim to respond **within 7 working days**
- c. Deal reasonably and sensitively with the complaint
- d. Take action where appropriate

A complainant's responsibility is to:

- a. Bring their complaint, ideally in writing, to the Trustees attention normally **within 8 weeks** of the issue arising
- b. Raise concerns promptly and directly with the Secretariat or BoT
- c. Explain the problem as clearly and as fully as possible, including any action taken to date
- d. Allow Scheme a reasonable time to deal with the matter
- e. Recognize that some circumstances may be beyond Scheme's control

2.4 Complaint/Compliment Handling Procedure

The Scheme has established the following procedure for handling complaints or compliments:

i. **Face to Face Report of Complaints or Compliments**

Clients of the KSG-SRBS with complaints or compliments shall report them to the scheme secretariat. The secretariat, upon receipt of the complaints or compliments shall act as follows:

- a. Issue client with a "Complaints or Compliments" Form, which is also available online and can be downloaded from www.ksgsrbs.ac.ke, where the client shall record the matter. Where the client cannot write, the officer shall assist in recording the complaint or compliment
- b. Forward the complaint or compliment to Trust Secretary **within Two working day** upon the receipt of the complaint or compliment for appropriate action
- c. For the complaint, communicate the final decision/action to the aggrieved party **within 15 working days**. If the issue cannot be resolved within this time, the secretariat shall inform the complainant accordingly and report the progress made in resolving the matter.

- d. Prepare brief summary of the complaints or compliments and share with Board of Trustees in the next meeting. If the matter is urgent, BoT may convene special meeting to discuss the matter.

- ii. **Social Media Reports of Complaints or Compliments**

When a complaint or compliment is received directly via the scheme's social media platforms; Facebook and Twitter accounts, the responsible officer shall:

- a. Handle the case and contact the client giving details on the action taken, and thereafter inform the Trust Secretary for record.

- b. Complaint shall then be handled as provided in (i) a-d above.

- iii. **Complaints or Compliments reported to the Trust Secretary or Board of Trustees**

When a complaint or compliment is made directly to the Trust Secretary or BoT, the Trust Secretary or BoT shall:

- a. Handle the matter and contact the client giving details on the action taken, and thereafter inform the Secretariat for record, or

- b. Refer the matter to the Secretariat, who shall then act as provided in (i) a-d above.

- iv. **Anonymous complaints or compliments**

When complaint or compliment is lodged anonymously

- a. The officer concerned will acknowledge receipt of the complaint or compliment

- b. Refer the matter to the Secretariat, who shall then act as provided in (i) a-d above.

- v. **Use of Complaints/Compliments Box and Register**

- a. Boxes and Registers labeled “Compliments/Complaints Box or registers shall be placed within open and easily accessible areas
- b. Clients will be encouraged to use boxes and registers to provide feedback
- c. Secretariat shall analyze the content of boxes and registers and forward the summary of report to Trust Secretary
- d. Trust Secretary shall submit the summary report to Board of Trustees for noting or necessary action

2.5 Complaints Management Tiers

- i. **Tier 1: Complaint Resolution at first point of contact**
 - a. The Secretariat shall resolve all complaints at this stage **within two working days** from the date of acknowledgement.
 - b. If a complainant remains dissatisfied following attempts to informally resolve, their complaint will be moved to the Tier 2 of the process
- ii. **Tier 2: Complaint resolution by Trust Secretary**
 - a. It is the responsibility of the Trust Secretary to manage Tier 2 complaints via Complaints, Compliments and Suggestion Procedures
 - b. This will be resolved within **five working days** from the receipt of the complainant’s dissatisfaction
 - c. If a complainant remains dissatisfied following attempts to resolve the complaint, their complaint will be moved to the Tier 3 of the process
- iii. **Tier 3 Complaint resolution by Board of Trustees (BoT)**

- a. It is the responsibility of the Board of Trustees to oversee complaints that have not be resolved at Tier 1 and Tier 2
 - b. This will be resolved **within 4 months** from the receipt of the complainant's dissatisfaction.
 - c. If a complainant remains dissatisfied following attempts to resolve the complaint, their complaint will be moved to the Tier 4 of the process
- iv. **Tier 4 Complaint resolution by external oversight agency**
- a. If a complainant remains dissatisfied with Tier 3 resolution, he/she may lodge his dissatisfaction with external oversight agencies such as RBA or relevant agency.
 - b. Board of Trustees will be informed of any outcome by RBA or relevant agency

2.6 Unreasonable or vexatious complaints

- i. There are occasions when complainants can act in a way that Secretariat or BoT might consider unacceptable. And whilst it is understood that complainants can sometimes become frustrated, we will not tolerate behavior which is deemed unacceptable, threatening, abusive or unreasonably persistent.
- ii. An unreasonable complainant can be characterized by any of the following:
 - a. Actions which are harassing, prolific, repetitive or obsessive
 - b. An insistence on pursuing unsubstantiated complaints
 - c. An insistence on pursuing a complaint in an unreasonable manner
- iii. A complainant, or anyone acting on their behalf, could be deemed to be unreasonable or vexatious if one or more of the following behaviors apply to them, including but not limited to:
 - a. Refusing to co-operate within the complaints investigation
 - b. Insisting on the complaint being dealt with in ways which are not within this policy

- c. Persistently making malicious unfounded allegations against other members, service providers or secretariat
 - d. Making unnecessary excessive demands on time and resources
 - e. Continually raising subsidiary, trivial, previously resolved issues or newly stated issues relating to the complaint whilst the complaint is being addressed
 - f. Persistently approaching the scheme through different routes about the same issue
 - g. Electronically recording meetings and conversations without the prior knowledge and consent of the other person(s) involved
- iv. We will always take great care and make sure that we have clear evidence before recommending any action to be taken with regard to unreasonable and vexatious complainant

SECTION THREE INSTITUTIONAL FRAMEWORK

3.1 Introduction

The compliance to this policy shall be ensured by the Board of Trustees. This policy provides mechanism on redress for administration and processing of complaints and compliments.

3.2 Board of Trustees

- i. The Board of Trustees shall ensure that there are adequate and effective Customer Feedback Systems and processes in place
- ii. The Board of Trustees may conduct periodic audits to ensure compliance with this Policy. Secretariat and members of the Scheme shall cooperate with such audits and any outcomes, including remedial plans
- iii. Approve the policy and provide governance oversight of activities under this policy.

3.3 Trust Secretary

- i. Implement the policy and Scheme Customer Service Charter
- ii. Advise Scheme staff on requirements for attending to customer feedback.
- iii. Ensure members, consultants, service providers and partners are aware of the policy and are supported to implement and work by it, as well as creating a management culture that encourages a focus on quality service delivery and excellent customer and members experience.
- iv. Ensure that the Scheme has complied with the legal requirements on Customer feedback.
- v. Facilitate capacity building of secretariat involved in customer service
- vi. Conduct risk assessments, and update controls and procedures to mitigate the reputation risk arising from bad publicity due to negative feedback

- vii. Ensure that all the risks related to complaints are captured in a risk register and addressed appropriately
- viii. Cooperate with external regulators on matters relating to complaints handling

3.4 Customer Service Officer

- i. Responds to all customer inquiries including complaints and compliments via phone, email, and in-person
- ii. Direct customers to utilize online customer feedback mechanism
- iii. Pitch ideas for improving customer care
- iv. Create and maintain reports about customer interactions
- v. Develop a rapport with customers
- vi. Encourage customers to complete surveys
- vii. Make recommendations to management to improve customer experience

**Scheme's Customer care can be contacted via the email:
customerfeedback@ksg-srbs.co.ke**

SECTION FOUR

IMPLEMENTATION, MONITORING AND REVIEW

4.1 Implementation

- i. The implementation of this policy shall be gradual and in phases.
- ii. The Board of Trustees will appoint Customer Service Officer
- iii. Policy will be launched and disseminated

4.2 Administration, Monitoring and Evaluation of the Policy

- i. Administration of this policy shall be the responsibility of
 - a. The Board of Trustees who are the Principal administrator of the policy
 - b. Trust Secretary who is responsible for the operationalization of the policy
- ii. Operating mechanisms shall be developed in consultation with members of scheme to ensure uniform application and understanding of the policy
- iii. Should there be need for clarification or interpretation on any specific matter, Trust Secretary in consultation with Board of Trustees shall exercise the administrative responsibility for such interpretation
- iv. Board of Trustees shall utilize Retirement Benefits Authority (RBA) assessment tool for Treating Customers Fairly (TCF) to continuously monitor, evaluate and improve on the Scheme services
- v. Upon approval by BoT, TCF assessment report shall be submitted to RBA on annual basis

4.3 Review of the Policy

- i. This policy shall be updated and revised whenever there are changes in policies, rules, procedures and guidelines as may be approved from time to time by the Board of Trustees
- ii. The Policy shall also be reviewed and updated every three (3) years to be in line with changes in relevant statutory and regulatory rules and procedures as necessary
- iii. Any proposed changes by the Secretariat to the Policy shall be brought to the attention of the Board of Trustees and approved using the “Amendments Records Sheet”

4.4 Independent Assurance

- i. The adequacy and effectiveness of scheme’s customer feedback procedures is subject to the regular internal audit reviews
- ii. Board of Trustees, where necessary, may call external review experts to provide assurance over the integrity of process, services, strategies and tools