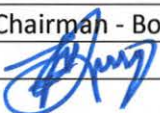




## SEYCHELLES PENSION FUND

Title	Complaint Handling Policy
Policy Number	SPF/Policy/CC/2/2020
Effective Date	July 2020
Review Year	
Approved by	Chairman - Board of Trustees
	

**Seychelles Pension Fund**  
**Complaint Handling Policy**

### **1.0 Introduction**

Seychelles Pension Fund's (SPF) Complaint handling policy provides for the avenue for SPF to receive complaints from the general public and addressing them accordingly. These complaints may be in relation to its activities, programs, products, services, employees and Trustees of the Board. Additionally, the policy provides for the procedures to be undertaken by SPF and the Board of Trustees (the Board) to address these complaints, respond to complainants and keep proper records of the same.

A complaint under this policy is a written or verbal expression of dissatisfaction by a person about the service, actions, or lack of action by SPF as an organisation or a staff member acting on behalf of SPF or the resolution of the Board of SPF or the actions of a Trustee of the Board.

The following are a few examples of complaints that a person may have:

- ❖ failure of SPF to execute a previously agreed decision;
- ❖ failure of SPF to observe or follow policy or procedures set by itself;
- ❖ error made by SPF's staff members; and
- ❖ unfair or discourteous actions/statements by SPF's staff members.

Any person personally affected by SPF or by a staff of SPF or by a Trustee of the SPF Board can make a complaint and the same will be reviewed in accordance with this policy.

### **2.0 Objectives**

SPF has an obligation under its mandate to ensure that any viable complaints from its members, pensioners, and stakeholders are dealt with promptly and resolved in a prompt and expeditious manner. Therefore, the objective of this policy is to:

- a. Provide for a simple procedure and accessible avenues for the public in general to submit complaints to SPF and to the Board;
- b. Implement internal procedures to disseminate complaints received to the relevant section to be addressed;
- c. Implement mechanism to keep in regular contact with complainants;
- d. Implement record keeping of complaints received and progress to address it; and
- e. Ensure complaints are addressed to the best of the abilities and resources available in a reasonable period of time.

### **3.0 Guiding principles**

- i. Addressing of all complaints should be **fair, impartial, transparent and respectful** to all parties involved, especially to the complainant and the respondent.
- ii. All responses to complaints should be provided with **clear and understandable reasons** for decisions relating to that complaint.
- iii. **Updates** should be provided to complainants during the internal review processes.
- iv. Complainants should be given the opportunity to **appeal a final response** to their complaints should they be dissatisfied with such response..

- v. Have in place **an effective reporting mechanism** to senior management and the Board of all the complaints made periodically.
- vi. Genuine complaints should be considered when **improving** SPF's products, services, policies, and procedures.
- vii. Complaint mechanism available to the public should be **well publicised** to ensure ease of access

#### **4.0 Access by the public for submission of complaints**

A complaint may be received verbally (by phone or in person) or in writing (by post, email and on the SPF website interface). The following provides details on access by the public to make a complaint:

1. Making an appointment with the Customer Relations Manager
2. Walk-in clients request to see the Customer Relations Manager at the Reception at SPF's main offices
3. Making a complaint over the phone by calling the Customer Relations Manager
4. Sending an email to the Customer Relations Manager through [complaints@spf.sc](mailto:complaints@spf.sc)
5. Sending post to Customer Relations Manager
6. Completing the complaint form on the Seychelles Pension Fund website.

#### **5.0 Complaint Handling procedures**

The below states the procedures to be followed from the receipt of complaints to the final response following internal review.

##### **5.1 Complaint Receipt**

All complaints shall be received by the SPF's Customer Relations Manager, who shall immediately log all information received from the complainant in an electronic register. Minimum information to be logged are as follows:

1. Basic contact information including full name, phone number and email address
2. Clear reasons for complaints
3. Any supporting documents referred to in the complaints

The Customer Relations Manager may address the complaint if practicable. If not, the complaint should be submitted as per point 5.2 below and a written acknowledgement shall be submitted to the complainant within 2 working days of receipt of the complaint.

If the complaints pertain to a staff of SPF, the complainant will also be informed that during the process, the staff in question will be made aware of the complaint so that they can represent themselves accordingly.

##### *- Anonymous complaints*

Complaints may be accepted if done anonymously, however, it may not be addressed to the complainant's satisfaction and may only be used for internal purposes. In such cases, the complainant should be made aware of this and be requested to inform on how they will be contacted on the outcome of the investigations.

##### **5.2 Allocation of complaints**

The SPF's Customer Relations Manager shall keep track of date submitted in the electronic register, transfer complaints received and following up, where necessary. All complaints should be allocated within **24 hours** of receipt of all information required from the complainant.

The Customer Relations Manager is responsible to submit complaints received as stated below, even if the complaints pertain to his actions and responsibility. Failure to do so shall subject the Customer Relations Manager to disciplinary actions. The supervisor of the Customer Relations Manager shall check from time to time that this is being followed accordingly.

*i. Complaints made on CEO, Board matters and/or Trustee of the Board*

In the event a complaint is made against the CEO or Board matters or a Trustee of the Board, the SPF's Customer Relations Manager shall submit complaints directly to the Chairman of the Board to conduct the necessary investigation. The Chairman may choose to send the complaint to the Audit and Risk Committee if it is determined that there is a need to do so.

In the event a report is made against the Chairman of the Board, the SPF's Customer Relations Manager shall submit to the Audit and Risk Committee directly to conduct necessary investigations.

*ii. Complaints on day-to-day business of SPF and on SPF staff*

- a. SPF's Customer Relations Manager shall submit the complaint received on SPF staff as follows:
  - i. Complaints made on posts directly under the responsibility of the CEO shall be submitted to the CEO such as complaints on all Chiefs, the Internal Audit Executive, the Head of Property, the Head of Projects, and Business Development Manager.
  - ii. Complaints made on posts directly under the responsibility of Chiefs shall be submitted to the respective Chief
  - iii. Complaints made on posts directly under the responsibility of Heads shall be submitted to the respective Heads with Chiefs of respective Departments in copy
  - iv. Complaints made on posts directly under the responsibility of Managers shall be submitted to the respective Manager with Chiefs of respective Departments in copy.

The Customer Relations Manager may consult with the Human Resources and Administration Division to confirm which supervisor is responsible for a specific post and in the event that a supervisor is absent, to enquire on who is responsible for the supervisor's duties during that period.

- b. SPF's Customer Relations Manager shall submit the complaint received on day-to-day business of SPF as follows, while keeping CEO in copy of all submissions:
  - i. Complaints made on issues relating to Pension to Chief Pension Administrator and Head of Benefits
  - ii. Complaints made on issues relating to Finance to Chief Finance Officer and Financial Controller
  - iii. Complaints made on issues relating to Investment to Chief Investment Officer and Head of Investment



- iv. Complaints made on issues relating to Operations to Chief Operations Officer and as follows for those issues specific to:
  - Information Technology to Head of IT
  - Human Resources and Administration to Head of Human Resources and Administration
  - Risk Management to Head of Risk Management
  - Corporate Communications to Head of Corporate Communications
- v. Complaints made on issues relating to Internal Audit to the Internal Audit Executive
- vi. Complaints made on issues relating to Property to Head of Property
- vii. Complaints made on issues relating to Projects to Head of Property
- viii. Complaints made on issues relating to Business Development and Legal and Compliance to Business Development Manager

In the above cases, the CEO or respective Chiefs/Heads/ Managers, shall be responsible to conduct the necessary investigation after receiving submissions of complaints. In their absence, the post delegated their responsibilities shall receive complaints and conduct investigations.

Upon receipt of complaints, it is the responsibility of the recipient to ensure that their supervisors, if any, are aware of complaints made, and request necessary approval on the response if required depending on severity of the complaint.

### **5.3 Additional information or document receipt**

During investigation, if additional information is required from the complainant, this should be queried through the Customer Relations Manager or if communicating directly with the complainant, the Customer Relations Manager should be kept informed for record purposes. All additional queries to the complainant shall be done in writing and include request for complainant to acknowledge receipt.

### **5.4 Resolving complaints**

Upon receipt of all necessary information and subject to 5.2 above, the Chairman, the Audit and Risk Committee or the CEO or the Chiefs/Heads/ Managers shall ensure that all complaints are addressed in not more than 14 working days. Any extension of this time period should be justified accordingly in writing and submitted to Customer Relations Manager to update his register accordingly and inform the complainant that there will be a delay.

They shall investigate and provide a response for the complaint accordingly. Should the investigation require higher internal level of involvement or legal advise, same shall be requested accordingly through the usual channels. For example, if a Head of Section is investigating and requires involvement of their Chief's to attain a final response, they may proceed to do so during the investigation process. Additionally, if the legal advice is required the staff responsible for legal matters may be consulted and this may further be escalated to the independent legal counsel of SPF for their legal advice and guidance.

In the event that the complaint is on a staff member of SPF or a Trustee of the Board, the investigation process shall allow for the individual to provide their inputs on the same. Their

inputs will be considered in the investigation when determining the response and actions to be taken on the complaints made.

If the investigation shows evidence of intent of criminal activities or of corruption, the:

- a. Chief/Heads/Managers conducting the investigation shall inform CEO
- b. Audit and Risk Committee of the Board conducting the investigation shall inform the Chairman of the Board

In both cases above and in the event that the Chairman of the Board or the CEO is conducting the investigations themselves, the CEO or the Chairman shall provide instructions for the case to be referred to the:

- i. Attorney General and/or the Police in the case where it relates to criminal activities having taken place
- ii. Anti-Corruption Commission in the case where it relates to corruption having taken place

### **5.5 Responses on complaints**

All responses on complaints to the complainants shall, subject to 5.2 and 5.4, be signed by the Chairman of the Audit and Risk Committee (or a member of the Audit and Risk Committee as appointed by the Chairman) or the CEO or the Chiefs/Heads/Managers conducting the investigation and be channelled through the Customer Relations Manager for submission to the complainant.

### **5.6 Appeals on complaints**

In the event that a complainant is not satisfied with formal response received, they may appeal on the same through the Customer Relations Manager who shall submit the appeal to:

1. Chairman of the Board if preliminary response was sent by the Audit and Risk Committee or by CEO; or
2. CEO if the preliminary response was sent by Chiefs/Heads/ Managers.

### **6.0 Reporting requirements**

The Customer Relations Manager shall inform the Head of Corporate Communication and the Chief Operations Officer of any complaints received on a weekly basis.

The Customer Relations Manager shall include in his monthly report to the CEO, through his supervisor, the following:

- a. number and type of complaints received during that reporting month and their status; and
- b. types of preceding complaints received and its status, including the number of complaints addressed during that respective year

Chiefs/Heads/Managers may also include a complaint being investigated in their monthly report to CEO depending on the severity of the complaint.

CEO may enquire further to the Customer Relations Manager or Chiefs/Heads/Managers about a respective complaint.

The CEO shall submit a report to the Board, at a minimum, on a semi-annual basis on the complaints received and their status.

The Chairman and the Audit and Risk Committee shall provide the Board an update on each case it has received and is investigating, as the need arises.

## **7.0 Records**

All records relating to complaints shall be kept at SPF for a period of 7 years at the minimum.

All records of receipts and responses of complaints and responses shall be kept by the Customer Relations Manager.

All documents pertaining to the investigation shall, subject to 5.4, be kept by the Audit and Risk Committee or the CEO or the Chiefs/Heads/Managers.

## **8.0 Confidentiality**

Personal information of complainants and details of complaints may only be shared with those involved in the investigations and should not be disclosed to other staff not involved in the complaints.

## **9.0 Responsibilities**

The Board is ultimately accountable for ensuring that the intent of this Policy is carried out through the processes and procedures established and recommend changes as the case may be. The Board has delegated responsibilities and functions to the following:

*i. The Customer Relations Manager is responsible for:*

1. receiving complaints from the public as per 4 above
2. allocate the complaints and any information received as per 5.2 above
3. submit responses received from Audit and Risk Committee or CEO/Chief/Head/Managers;
4. ensuring that appropriate records are kept on file and stored confidentially;
5. informing all customers of availability to make a complaint; and
6. shall submit electronic register of complaints to the CEO on a monthly basis.

In the absence of the Customer Relations Manager, its supervisor shall be responsible for all duties above. Any further absence thereafter should be in accordance with succession plan or as confirmed by Human Resources.

*ii. The Audit and Risk Committee is responsible for:*

1. assessing the complaints received as per 5.2;
2. carrying out investigations into the matter;
3. make any recommendations for internal purposes to the Board
4. submitting their response to complainant through the Customer Relations Manager and copy to the Board

*iii. The CEO/Chiefs/Heads/Managers are responsible for:*

1. assessing the complaints received as per 5.2;
2. carrying out investigations into the matter;
3. make any recommendations for internal purposes to the CEO; and
4. submitting their response to complainant through the Customer Relations Manager.

iv. *The Complainants* are responsible for:

1. Providing a clear and honest account of their concerns and expectations;
2. Providing relevant information and documents to assist with investigations and resolution of the matter;
3. Engage openly and respectfully with SPF to assist in resolving the matter; and
4. Responding to request for information in a timely manner.

v. *Respondents* are responsible for:

1. Providing a clear and honest response to complaints against them in a timely manner;
2. Providing relevant information and documents to assist with investigations and resolution of the matter;
3. Engage openly and respectfully to assist in resolving the matter; and
4. Responding to request for information in timely manner.

## 10.0 Disciplinary Actions against non-compliance

In the event that a Trustee of the Board and staff of SPF do not comply to this Policy, necessary disciplinary actions shall be taken in accordance with the Board Charter and/or the Audit and Risk Committee Charter or the SPF's human resource and administration policies.

## 11.0 Approval and Review of this policy

This policy is to be reviewed on an annual basis, or when the need arises. All approval pertaining to the amendment of this Policy shall be made by the Board.

## 12.0 Version Control

<b>Title:</b>	Complaint Handling Policy			
<b>Created By:</b>	Business Development			
<b>Date Created:</b>	July 2020			
<b>Maintained by:</b>	Corporate Communications			
<b>Version Number</b>	<b>Modified by</b>	<b>Modification made</b>	<b>Date modified</b>	<b>Status</b>
Version 1	Business Development Manager (MBD)	Proposed first draft	21/07/2020	Draft
Version 2	Level 1 and MBD	Amendment of: <ul style="list-style-type: none"> <li>- 3.0 Guiding principles</li> <li>- 5.2 Allocation of complaints</li> <li>- 5.3 Additional information or document receipt</li> <li>- 5.4 Resolving complaints</li> <li>- 5.5 Responses on complaints</li> <li>- 9.0 Responsibilities</li> </ul>	28/07/2020	Draft



		New insertion of: <ul style="list-style-type: none"> <li>- 5.6 Appeals on complaints</li> <li>- 6.0 Reporting requirements</li> <li>- 10.0 Disciplinary Actions against non-compliance</li> </ul>		
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