



SOP-OPS-Client Complaints

Procedure

Prepared for Internal

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Insight creates the conditions
that enable people, organisations
and businesses to thrive.

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1 Overview

This procedure provides guidelines for engaging with External Stakeholders (e.g. customers or members of the public) to enable the timely, efficient and effective management of grievances or a complaint when/if they are raised regarding any aspects of Insight's operations or service delivery. Guidelines for handling internal complaints or grievances and Whistle blower cases are outlined in different procedures.

1.1 Definitions

The following provides definitions of the terms Complaint and Grievance;

- **Complaint.** A Complaint includes any complaint made by an individual or company which arises as a result of the alleged acts or omissions of Insight or any personnel (including contractors or employees engaged by it at the time the alleged acts or omissions took place) or any of its subcontractors.
- **Grievance.** A Grievance is the cause of or grounds for a complaint.

2 Categorisation of a Complaint or Grievance

Complaints / Grievances are divided into the following categories:

- Customer Complaints. Customer Complaints relate to issues associated with operational service quality, they may involve employees, contractors or subcontractors or any entity that provides a service on behalf of Insight. The Complaint Handling Officer (CHO) will ensure that all customer complaints are recorded in the Complaints Register (**F-OPS-Complaints Register**) are escalated appropriately and resolved within agreed timelines. A call should be made to the client no longer than 24 hours later by a senior manager within the office the complaint was raised from. The CHO should ensure that the complaint is handled and resolved in an efficient manner to ensure that the customer is fully satisfied on closure. Guidelines for handling client complaints are outlined within this procedure.
- Whistleblowing. Whistleblowing is the disclosure of information by an employee or contractor which relates to some danger, fraud or other illegal or unethical conduct in the workplace. If a Complaint relates to his/her personal circumstances in the workplace then the complainant should use Grievance Procedure and not the Whistleblowing Policy. If the Complaint falls within the remit of the Whistleblowing Policy (**P-COR-Whistleblower Policy**), the Operations Manager shall refer the complaint to Insights designated Whistleblowing policy, requesting them to write to the whistleblowing email address (whistleblowing@insightsecure.com).
- Internal Grievance. If the Complaint is made by Insight employee or contractor working on behalf of the company and does not fall within the remit of the Whistleblowing Policy, the CHO shall refer the Complaint to the Human Resources department, and will be handled inline with the Grievance Procedure (**SOP-HR-Internal Grievance Policy & Procedure**) . HR shall ensure that the Complaint is properly addressed in a timely manner in accordance with all relevant Insight policies, until resolution. Recorded and tracked on the grievance register.
- Comment/Observation. If the Complaint is determined by the CHO (i) does not fall within any of the above and (ii) is not otherwise actionable as an External Grievance (see below), and



where the complainant makes no specific allegation or produces no substantive evidence against either Insight as a company or an individual working for Insight: the CHO shall refer the Complaint to an appropriate internal recipient and the complainant should be advised what (if any) action is being taken.

- **External Grievance.** If the CHO determines that a Complaint does not fall within any of the above, he/she shall classify the Complaint as an External Grievance. An External Grievance is one made by a person who is neither a Client nor a person working for the company in any capacity but which concerns a specific allegation made with substantive evidence in support against Insight itself or a current contractor or employee (in connection with their performance of services for Insight). Depending on the severity as determined by the Country Manager, it may be necessary that the external grievance is handled by an external legal entity or other competent authority.

3 Cascading Complaints and / or Grievances

An initial client complaint or external grievance may be raised directly to any member of Insight and this may be direct to a Guard or to the Supervisor when visiting a working location. The first initial contact with a customer or a member of the public will go a long way to setting the initial impression of how professional Insight comes across as a business and for providing initial reassurance that the complaint or grievance will be initially handled.

External grievances may be raised if Insight is alleged to have acted in a way that:

- Causes a vehicle/road traffic accident.
- Causes harm, injury or death to people.
- Results in damage to the property of external stakeholders (could include; all types of infrastructure, residences, business premises, vehicles, personal possessions etc.).
- Could result in Insight directly or indirectly promoting or funding crime, violence or other activities which adversely impact on human rights in the area of operations.
- Causes damage to the built or natural environment as a result of accidental or deliberate actions by Insight causing collateral adverse impacts for communities.

A client complaint may be raised if a customer is unhappy with a matter relating to the delivery of services as outlined in their contract. Examples include (list not exhaustive):

- Incorrect invoicing / billing issues
- Service quality
- Timekeeping of personnel
- Faulty equipment

3.1 Initial receipt or awareness of a client concern

- Direct to any Insight employee
- Via the country specific complaints email address:
 - Kenya: ComplaintsIKE@insightsecure.com



- DRC: ComplaintsIDC@insightsecure.com
- Tanzania: ComplaintsITZ@insightsecure.com
- South Sudan: ComplaintsISS@insightsecure.com
- Call the office via the main office number or the control room out of office hours.
- By completing the complaints form (**F-OPS-Complaints Form**)

On receipt or on being made aware of the initial complaint or external grievance it is important to ensure a very clear understanding of what exactly the concern is.

The first step will be to try to deal with the concern and to ensure that the complainant is made to feel comfortable and that Insight is receptive to dealing with the concern. A manager within the country the complaint originates should contact the client ideally within 6 – 12 hours, but no later than 24 hours of initial receipt of the complaint.

3.2 Handling the concern

1. If the complaint is received directly by an employee or a phone call (ie. not via email) whoever received it must ensure that the details are documented in an email or a completed complaints form and this is then forwarded to the country specific complaints email address so that it is captured on the register.
2. The Operations Manager will have overall ownership of the Complaints register, and be the main recipient of the country complaints email address (although others will be in copy), it is their responsibility to ensure someone is assigned to manage the complaint and close it.
3. This email address (inbox) will be the central location for receiving complaints, from here all details will then be entered onto a Complaints register (**F-OPS-Complaints Register**) to allow for tracking and monitoring of all the complaints.
4. If a guard receives the complaint, they are to contact their Supervisor who will be required to deal with the complaint, however, if they are not able to handle it, then they should immediately report the matter to the office.
5. If the supervisor is unable to handle the complaint, it is important that they communicate this to the client, and reassure them that the details have been forwarded to the office for handling.
6. The person handling the concern is to ensure that the person raising the concern is satisfied with the action and where applicable, necessary action to prevent recurrence is to be identified and actioned.
7. The person handling the complaint must also ensure that the final outcome / resolution and corrective actions are communicated to the Operations Manager to update the complaints register.
8. During the after action review the corrective action, root cause analysis and status should be updated on the complaints register.
9. During the Monthly Country Management Review meeting the complaints register will also be reviewed and any further comments will be made and the case closed.
10. If there are cases still open, these need to be urgently addressed and the reasons for non-closure must be documented.
11. Also, during the meeting some trend analysis can be carried out and any common complaint types addressed with further corrective actions or preventative actions proposed.



12. Where the complaint is directly against a third-party / sub-contractor working on behalf of Insight, appropriate follow up actions should be taken to address this. If the complaint has been validated, then this may require that the third-party arrangement is reviewed or terminated depending on the nature of the complaint, and the contract terms etc.

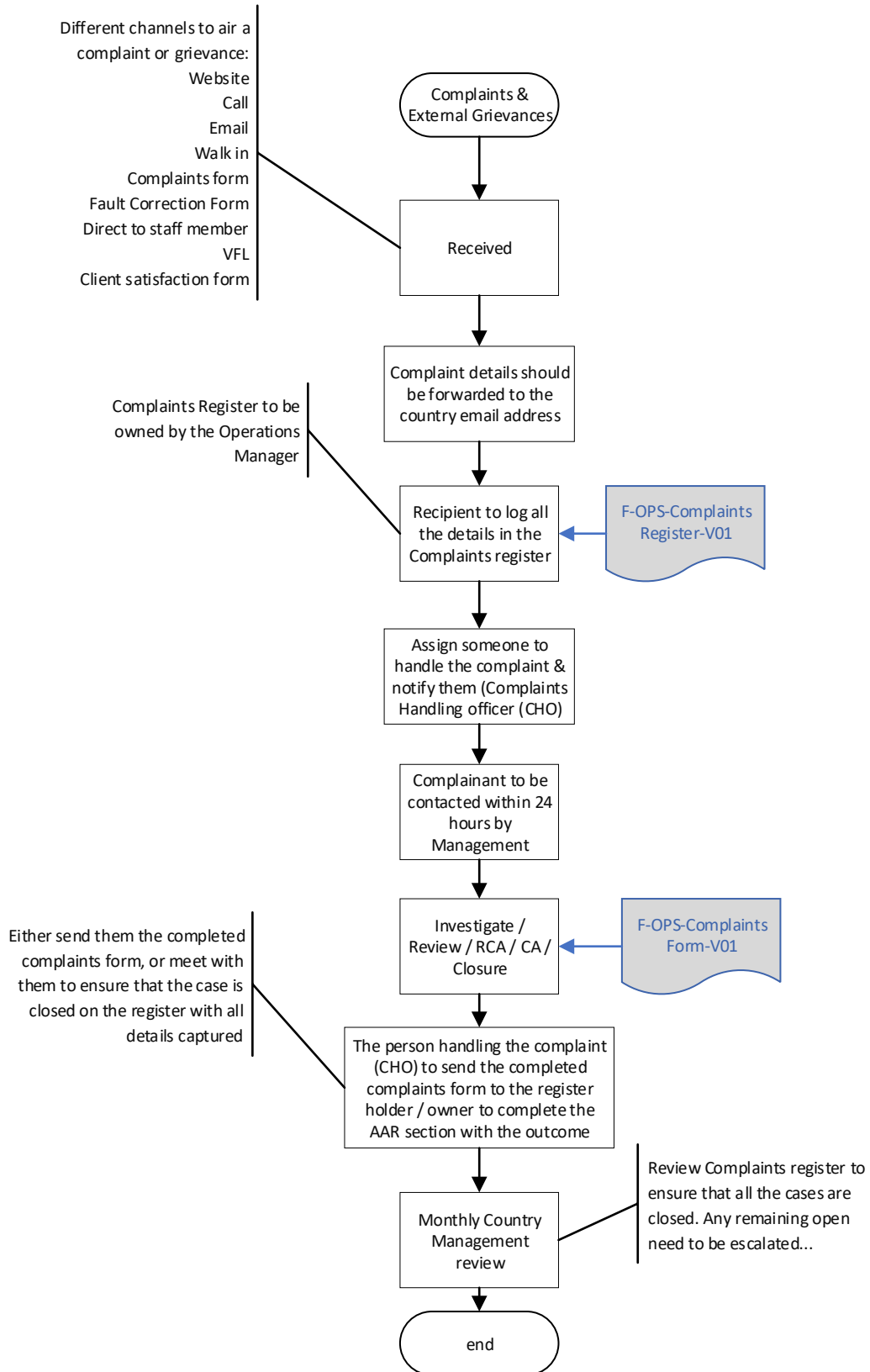
4 Complaints Following an Incident

In the event of an incident taking place e.g. road traffic accidents or an individual being refused access to a location, the individual(s) involved may feel aggrieved by the actions of Insight.

All these incidents are to be reported to the control room and handled as per the incident management and reporting procedure (**SOP-OPS-Incident Reporting & AAR**).



5 Complaints Process Flow



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