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# Complaints Handling Policy

November 2025

## Approval

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## Introduction

Apstar D.T Savings and Credit Cooperative Society Limited (hereafter “the SACCO”) is committed to handling member complaints promptly, fairly, and transparently. This policy outlines how the SACCO manages complaints to ensure member issues are resolved within clear timeframes and in compliance with regulatory requirements. We value member feedback and view complaints as opportunities to improve our services and uphold members’ rights. All complaints will be addressed without bias or retaliation, and the confidentiality of the complainant will be respected.

### 1. Objective

This policy establishes a structured yet adaptable framework for receiving, handling, and resolving complaints. Our key objectives are to:

- a) **Ensure timely and effective resolution** of complaints while aligning with our operational capacity.
- b) **Empower members** by providing clear education on their rights and the complaint process.
- c) **Enhance efficiency through technology**, leveraging a CRM system and secure online portal for streamlined complaint tracking, resolution, and reporting.
- d) **Promote transparency and accountability** by valuing feedback and using insights to continuously improve our products, services, and processes.

### 2. Scope and Definitions

#### 2.1. Scope

This policy applies to all aspects of our operations and governs the handling of complaints from SACCO members and other stakeholders regarding our products, services, staff or the complaints handling process itself. It covers the full complaint resolution process, from initial receipt to final resolution, including escalation and follow-up procedures.

Complaints addressed under this policy may relate to:

- a) Financial products and services
- b) Customer service experiences
- c) Staff conduct
- d) Any other operational concerns affecting members or stakeholders

## 2.2. Definition of terms

To ensure clarity and a shared understanding, the following terms are defined as they relate to the complaints handling process:

- a) **Complaint:** A formal expression of dissatisfaction made by a member, customer, or any person directly affected, regarding the SACCO's products, services, staff, or the complaints handling process itself. Complaints may arise from perceived failures to meet legal obligations, contractual commitments, established standards of conduct, or expectations of fairness and transparency.
- b) **Complainant:** A member, customer, or any person who makes a complaint. Complainants may act on their own behalf, on behalf of another person (with their written consent), or as a representative of a group affected by the issue at hand.
- c) **Resolution:** The outcome of the complaint handling process, which may involve correcting an issue, providing an explanation, apology, compensation, or any combination of these, aimed at satisfactorily addressing the complainant's concerns.
- d) **Acknowledgement:** The initial response to the complainant confirming receipt of their complaint, providing a reference number, and outlining the next steps in the complaints handling process.
- e) **Investigation:** A thorough examination of the complaint, involving a review of relevant documents, policies, and procedures, and possibly interviews with involved parties, to ascertain the facts and determine the validity of the complaint.
- f) **Remedy:** The action or combination of actions taken to resolve a complaint. Remedies may include, but are not limited to, an apology, explanation, correction of the error, financial compensation, or changes to policies or practices to prevent future occurrences.
- g) **Escalation:** The process of referring a complaint to higher levels of management within the SACCO or to an external body such as SASRA for further review or resolution, especially when the complainant is dissatisfied with the initial response or resolution.
- h) **Feedback:** Opinions, comments, and expressions of interest or concern, made by the complainant or any stakeholder, about the SACCO's products, services, or the complaints handling process, that do not require a resolution.



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- i) **Confidentiality:** The principle of maintaining privacy and secrecy around the details of a complaint, the identity of the complainant, and any information gathered during the investigation and resolution process, except where disclosure is necessary as part of the resolution or is required by law.

These definitions are foundational to the understanding and application of this policy, ensuring that all parties involved have a clear understanding of their rights and responsibilities throughout the complaints handling process.

### 3. Abbreviations and Acronyms

In this policy, the following abbreviations and acronyms are used and are defined as follows:

- a) **SASRA:** SACCO Societies Regulatory Authority – The regulatory body responsible for overseeing the operations of Deposit-taking and specified non-deposit-taking SACCO societies in Kenya, ensuring they adhere to legal and regulatory standards.
- b) **SACCO:** Savings and Credit Cooperative Organization – A member-driven financial institution that operates on cooperative principles, offering savings, loan, and other financial services to its members.
- c) **KYC:** Know Your Customer – The process of a business verifying the identity of its clients, a principle that is increasingly important in financial institutions, including SACCOs, to prevent fraud and comply with anti-money laundering laws.
- d) **MP:** Member Protection – Refers to practices, laws, and regulations aimed at safeguarding Members from unfair, deceptive, or fraudulent practices in the marketplace.
- e) **MC:** Market Conduct – Pertains to the behaviour of financial institutions, including SACCOs, in the marketplace, focusing on how products and services are offered to Members, ensuring fairness, transparency, and integrity.
- f) **FAQ:** Frequently Asked Questions – A list of common questions and answers on a particular topic, often used to address typical concerns or inquiries related to the complaints handling process.
- g) **CRM:** Customer Relationship Management – Refers to practices, strategies, and technologies used by financial institutions, including SACCOs, to manage and analyse customer interactions and data throughout the customer lifecycle, with

the goal of improving customer service relationships and assisting in customer retention and sales growth.

- h) **ADRs: Alternative Dispute Resolution Mechanisms** - methods such as mediation, arbitration, or conciliation used to resolve disputes outside formal court proceedings. ADRs are especially useful for resolving disputes efficiently, privately, and amicably.

This list is not exhaustive and may be updated or expanded to include other relevant abbreviations and acronyms as necessary to ensure the policy remains comprehensive and up to date with industry standards and regulatory requirements.

#### **4. Regulatory and Policy Alignment**

Our complaint handling process complies with the guidelines set by the SACCO Societies Regulatory Authority (SASRA) and adheres to the following legal and regulatory frameworks:

- The Constitution of Kenya, 2010
- The Cooperative Societies Act, CAP 490A
- SACCO Societies Act No. 14 of 2008
- SACCO Societies (Deposit-Taking Business) Regulations, 2010 and SACCO Societies (Non-Deposit-Taking Business) Regulations, 2020.
- SASRA Guidelines and Circulars
- Data Protection Act, 2019
- Fair Administrative Action Act, 2015
- POCAMLA Act, 2019
- Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) Guidelines
- Consumer Protection Act, 2012
- The Competition Act, CAP 504
- Employment Act, 2007
- International Standards (ISO 10002:2018) (Complaints Handling)



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To maintain relevance and effectiveness, this policy will be **reviewed every three years** to ensure alignment with evolving industry standards, regulatory requirements, and member needs. Updates will also extend to associated documents, including the FAQs, to reflect any changes in procedures or best practices.

## **5. Conduct of SACCO Officials in Handling Complainants**

The SACCO is committed to managing all complaints fairly, ethically, confidentially, and in full compliance with relevant laws and internal policies. SACCO officials must consistently uphold these values during all interactions with complainants.

### **a. Professionalism and Integrity**

- i. Staff must remain objective, impartial, and respectful always.
- ii. Conflicts of interest—actual, potential, or perceived—must be promptly declared in writing to supervisors. Each staff member handling complaints is required to sign a conflict-of-interest declaration.

### **b. Fairness and Objectivity**

- i. Complaints will be assessed strictly on merit, regardless of the identity, status, or affiliations of the parties involved.
- ii. Decisions and resolutions must always be evidence-based, free from personal bias or discrimination.

### **c. Confidentiality**

- i. Staff must rigorously adhere to confidentiality requirements under the **Data Protection Act, 2019** and internal SACCO policies.
- ii. Information received during the complaint process may only be disclosed if mandated by law or internal policy.

### **d. Transparency and Clear Communication**

- i. The SACCO commits to responding promptly, clearly, and accurately to all complaints.
- ii. Complainants will be clearly informed about their rights, available procedures, escalation pathways, timelines, and potential outcomes.
- iii. Any delays must be proactively communicated to complainants, including clear explanations for delays and updated resolution timelines.

### **e. Ethical Behaviour and Anti-Corruption Measures**

- i. SACCO staff must not ask for or accept favours, gifts, inducements, or other forms of undue influence from complainants or third parties.
- ii. Staff must immediately report any attempts at bribery, undue influence, or unethical practices to the appropriate authorities as provided for in the various SACCO policies governing staff conduct.

- iii. Regular ethics and anti-corruption training will be provided as part of ongoing staff capacity-building initiatives.

## 6. How to Lodge a Complaint

We encourage members to lodge complaints through any of the following convenient channels. Information on how to submit a complaint is regularly communicated to members so that everyone is aware of the process:

- a. **In Person:** Visit any SACCO branch or office and speak with a SACCO officer. Our staff will assist in documenting your complaint on the complaints form (*Appendix I*).
- b. **By Phone:** Call our dedicated call centre number **+254111035600** and inform the Call Centre Agent that you wish to lodge a complaint. They will record the details and initiate the process.
- c. **By Email:** Send an email detailing your complaint to our official complaints email address **complaints@apstarsacco.coop**. Include your full name, membership number, and a description of the issue.
- d. **Website:** Submit your complaint through the SACCO's online complaints on our website (<https://apstarsacco.coop/member-service-charter/>). This website is accessible 24/7 for members to file complaints digitally. You will receive an electronic confirmation upon submission.
- e. **Suluhu:** This is a WhatsApp (**+254743787960**) Artificial Intelligent based platform accessible 24/7 for members to file complaints digitally. You will receive an electronic confirmation upon submission.

When lodging a complaint, please provide as much detail as possible, including relevant dates, supporting documents (receipts, forms, screenshots, etc.), and what you consider a fair resolution. This will help us address the issue more effectively. There is no fee for filing a complaint, and members are encouraged to voice their concerns freely.

## 7. Complaint Handling Process and Timelines

We have defined clear steps and **explicit resolution timelines** for handling complaints, so members know what to expect at each stage:



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- 7.1. Acknowledgement:** The SACCO will acknowledge receipt of a complaint within **three [3] working days** of receiving it using the acknowledgement form (Appendix II). This applies to a, c, d provided in Section 6. This acknowledgement may be given immediately for complaints lodged via email or the online portal. The acknowledgement will include the complaint ticket ID number and the name or department of the officer handling the complaint. It may also outline the next steps or request additional information if needed.
- 7.2. Investigation:** After acknowledging the complaint, the SACCO will investigate the issue thoroughly. A staff member trained in complaints handling will be assigned to review the details, contact the complainant for any clarification, and gather any additional information required. We aim to conduct the investigation and fact-finding as quickly as possible, especially for straightforward cases. **Complex complaints** may require more in-depth inquiry or coordination across departments, but they will be handled with urgency and care.
- 7.3. Resolution and Response:** We are committed to providing a final response and resolution within **21 calendar days** from the date a complaint is received, in line with regulatory guidelines. Specifically, our goal is to conclude the investigation within **14 working days** and communicate the outcome to the member within an additional **7 days**, for a total resolution timeframe of 21 days. If a resolution is reached sooner, we will respond to the member as early as possible. Our response will detail the findings of the investigation, our decision, and any remedial actions to be taken (if the complaint is upheld). Possible resolutions may include an apology, corrective action, reversal of a decision, product/service replacement, refund/compensation, or other appropriate remedies. If the complaint is not upheld, we will provide a clear explanation for our decision.
- 7.4. Delays and Updates:** If we cannot resolve the complaint within the 21-day timeframe due to its complexity or other extenuating circumstances, the SACCO will inform the complainant *before* the deadline expires. We will explain the reasons for the delay and provide an updated timeline for resolution. The member will be kept informed of the progress at reasonable intervals. Our aim is to maintain transparency so that the member is never left wondering about the status of their complaint.

Throughout the process, the SACCO emphasises courtesy, objectivity, and fairness. All complaints are handled impartially, and those investigating will consider the facts without bias. Members have the right to enquire about the status of their complaint at any time during the process. The SACCO's CRM system helps us monitor these timelines and send reminders to staff to ensure we meet our response targets.

## 8. Compliance with Data Protection Principles

We strictly adhere to the **Data Protection Act, 2019**, ensuring that all personal data collected during the complaints process is handled responsibly and securely. Our commitment includes:

- **Lawfulness, Fairness, and Transparency:** Personal data is collected solely for complaint resolution and processed transparently, in accordance with legal requirements.
- **Purpose Limitation and Data Minimisation:** Only the data necessary for handling and resolving complaints is collected and processed, avoiding unnecessary information.
- **Accuracy and Storage Limitation:** Data is kept accurate and updated, with retention limited to the necessary period for resolution and compliance purposes.
- **Integrity and Confidentiality:** Strong security measures protect personal data from unauthorized access, loss, or misuse.
- **Accountability:** Regular audits, staff training, and oversight mechanisms ensure compliance with data protection laws and best practices.

These principles reinforce our commitment to protecting member privacy while maintaining an efficient and transparent complaints handling process.

### 8.1. Rights of Data Subjects

Complainants, as data subjects, have rights under the Data Protection Act, including the right to access their data, the right to request correction or deletion of their data, and the right to withdraw consent for data processing. Apstar DT Savings and Credit Co-operative Ltd will provide clear instructions on how complainants can exercise their rights as outlined in the Data Protection Policy

### 8.2. Reporting Data Breaches

In compliance with the **Data Protection Act, 2019**, the SACCO has established clear procedures for handling and reporting data breaches involving personal information collected during the complaints process:

- a. **Identification and Response:** Any suspected data breach (unauthorized access, accidental disclosure, loss, or destruction of personal data) must immediately be



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reported to the SACCO's **Data Protection Officer (DPO)** or designated responsible officer.

- b. **Internal Notification:** The DPO will initiate an immediate internal investigation to assess the scope and impact of the breach, document findings, and implement corrective actions to contain and mitigate the risks.
- c. **Reporting to the Regulator and SASRA:** Data breaches that present risks to members' privacy rights must be reported without delay—and **within 72 hours** of discovery—to the **Office of the Data Protection Commissioner (ODPC)**.
- d. **Additionally, SASRA must be informed simultaneously,** providing comprehensive details on:
  - Nature and extent of the breach
  - Categories and approximate number of affected members
  - Potential impacts and associated risks
  - Measures taken to mitigate the breach and prevent recurrence
- e. **Communication to Affected Members:** Members affected by significant data breaches will be promptly informed, transparently explaining:
  - The nature and implications of the breach
  - Potential risks and protective measures
  - Actions taken by the SACCO to address the issue
  - Contact details for further inquiries
- f. **Record-Keeping and Review:** Detailed records of all breaches, regardless of severity, must be maintained. Regular analysis of these records supports continuous improvements in data protection practices.

Prompt and comprehensive reporting to both ODPC and SASRA ensures regulatory compliance, transparency, and effective management of data breach incidents.

### **8.3. Data Protection Training for Complaints Handling Staff**

Staff involved in the complaints handling process will receive training on data protection principles, ensuring they understand the importance of data privacy and are equipped to handle personal data in accordance with legal requirements and best practices.

By integrating these data protection principles into our complaints handling policy Apstar DT savings and credit Co-operative Society LTD not only complies with legal obligations

but also reinforces our commitment to protecting the privacy and rights of our members and stakeholders.

## 9. Escalation Pathways

While we strive to resolve all complaints at the first point of contact, we recognise that some issues may require escalation. The SACCO has established clear **escalation pathways within our management structure** to ensure complex or unresolved complaints receive swift attention at higher levels. If you are not satisfied with the response or resolution provided at any stage, you may escalate your complaint as outlined below:

- a) **Frontline Resolution (Level 1):** The complaint will be handed by the Customer Relations Assistant- complaints officer within the Business Development and Marketing department. If the member feels the issue is not resolved or the response is unsatisfactory, they should request that the matter be reviewed by the Marketing/ Customer Relations Officer (M&CRO). The M&CRO will revisit the complaint, ensure it was handled properly, and attempt to resolve the issue.
- b) **Senior Management Review (Level 2):** If the complainant is still dissatisfied after Level 1 escalation, or if the complaint is particularly complex/serious, it will be referred to Head of Business Development and Marketing Department by **the M & CRO**. The Head of Department will conduct an independent review of the case and provide a final internal decision or solution. The member will be informed in writing about the timelines for this review (usually an additional few days beyond the initial 21-day window, depending on the complexity).
- c) **Executive/Board Appeal (Level 3):** In cases where a complaint remains unresolved or the member is not satisfied after the HOD response, the member may appeal using an appeal form (**Appendix III**) to the **Chief Executive Officer (CEO)**, or to the board through **Education & Marketing Committee**. The committee will impartially review all prior actions and either confirm the resolution or propose an alternative resolution. The decision at this level will be communicated as the SACCO's final position on the matter.
- d) **External Resolution (Level 4):**

Our aim is to resolve all complaints internally. However, if a member remains dissatisfied after fully exhausting all internal complaint resolution channels, they have the right to pursue external avenues. In such cases, the SACCO shall advise the member, in writing, of their right to refer the matter externally and in



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particular to the **SACCO Societies Regulatory Authority (SASRA)**. Depending on the specific nature of the complaint, referral to another relevant regulatory or oversight agency may also be appropriate. The SACCO will cooperate fully with any external investigation or resolution process.

**e) Alternative Dispute Resolution (ADR) and Judicial Review (Level 5)**

If a member is dissatisfied with the outcome provided by SASRA or another regulatory body, they have the option of pursuing further independent review through **Alternative Dispute Resolution mechanisms (ADRs)** such as mediation or arbitration. Members also retain the right to seek a **judicial review** by filing their complaint with the relevant court. The SACCO will provide any necessary documentation requested to facilitate these external review processes.

Each escalated step will be handled as swiftly as possible. When escalating, the member should ideally specify why they are dissatisfied with the prior response and what outcome they seek. At every level, SACCO logs the escalated and outcome in our CRM system for accountability. Our management is committed to treating escalated complaints with priority and ensuring that systemic issues raised by complaints are addressed to prevent future occurrences.

**10. Exclusions from the SACCO's Complaints Handling Process**

While the SACCO remains committed to resolving member complaints fairly and transparently, certain categories of issues fall outside our internal complaints handling procedures. These exclusions help maintain efficiency, protect complainants, and ensure matters are directed appropriately for effective resolution:

**a. Complaints against SACCO Officials or Senior Management**

Complaints directly implicating SACCO Board members, senior management, or key officials in misconduct, conflicts of interest, corruption, or unethical behaviour must be escalated directly to SASRA. Such cases are excluded from internal processes to prevent conflicts of interest or retaliation against complainants.

**b. Whistleblowing Complaints**

Complaints involving allegations of corruption, fraud, unethical conduct, or malpractice at high SACCO levels are handled under whistleblowing provisions and are thus excluded from standard internal complaints procedures.

- Members wishing to make protected disclosures or whistleblowing reports should do so confidentially to SASRA's dedicated whistleblowing reporting mechanisms.

**c. Hostility or Non-Cooperation by SACCO Staff**

In situations where SACCO officials, management, or staff actively impede, obstruct, intimidate, or refuse cooperation in resolving a legitimate complaint, the matter should be escalated externally to SASRA. Such behaviour undermines effective internal resolution processes and requires regulatory intervention.

**d. Criminal Allegations and Regulatory Breaches**

Complaints involving criminal acts (e.g., fraud, theft, money laundering, or terrorism financing) must be immediately reported to SASRA or the Financial Reporting Centre on claims related to crimes under POCAMLA Act, 2019.

**e. Issues Subject to External Legal Proceedings**

If a complaint is already the subject of formal legal action or arbitration proceedings, it will be excluded from the internal complaints process to avoid interference or duplication of processes.

**Guidance for Handling Excluded Complaints**

- i. The SACCO will promptly inform complainants in writing whose issues fall within these exclusions, clearly stating why internal handling is inappropriate.
- ii. Members will be provided with detailed instructions and contact information to facilitate reporting their complaints to SASRA or relevant law enforcement agencies.

**11. Complaints Reporting and Regulatory Returns**

**11.1. Complaints Reporting as per SASRA Guidelines**

In compliance with the **SASRA Complaints Management guidelines of 2023**, the SACCO is required to track and report complaints data as part of its regulatory obligations. This ensures transparency, accountability, and continuous improvement in complaints handling. Complaints reports must include:

- a) **Total number of complaints received** within the reporting period
- b) **Nature and classification of complaints** (e.g., financial products, service delays, staff conduct, system failures)

- c) **Resolution status** (resolved, pending, escalated)
- d) **Resolution timelines** (within or beyond policy timelines)
- e) **Recurring issues and systemic concerns** identified through complaints
- f) **Corrective actions taken** to address complaints and prevent recurrence
- g) **Member satisfaction levels** based on complaint resolution outcomes

#### **11.2. Submission of Complaints Reports as a Regulatory Return**

As part of its regulatory compliance, the SACCO must **submit quarterly complaints report to SASRA** in line with **Regulatory Returns requirements**. The report shall be submitted **by the 15th day following the end of each quarter** (i.e., April 15th, July 15th, October 15th, and January 15th). **(See Appendix 4)**

The report should be prepared in the format prescribed by SASRA and include both **quantitative and qualitative analysis** of complaints received, resolution trends, and key interventions made by the SACCO.

Failure to submit the report within the stipulated timeframe may result in regulatory sanctions or penalties as outlined in the SASRA compliance framework.

To ensure timely submission, the SACCO shall:

- a) Maintain complaints **register** updated in real-time to track all complaints received, their status, and resolutions.
- b) Designate a **Complaints Compliance Officer** responsible for compiling and verifying complaint data for submission.
- c) Conduct **internal reviews** of complaints handling effectiveness before each quarterly report submission.
- d) Align complaints tracking manually or through the SACCO's **Customer Relationship Management (CRM) system** to ensure accuracy and consistency in reporting.

#### **12. Member Education and Engagement**

The SACCO believes that an **informed membership** is key to a healthy complaint handling process. We are dedicated to ongoing member engagement and have a structured schedule for educating members about their rights and how to lodge complaints. Our member education initiatives include:

- a) **Regular Communications:** The SACCO will use multiple channels to disseminate information on member rights, the complaints procedure, and updates to this policy. In this Case, the Sacco has designated a section in the website containing dedicated information on complaints handling. In addition, the Sacco shall on quarterly basis publish information on complaints via the Sacco's official Social media channels reminding members how to lodge complaints, providing quick guides, or highlighting improvements made from past feedback. These posts shall ensure that even members who don't visit our branches often are reminded of the complaints process.
- b) **Workshops and In-Person Outreach:** The SACCO shall hold an in-person member workshop/education/Annual Delegates meeting/Regional delegates education meeting or any other forum focused on member rights, responsibilities, obligations and available feedback mechanisms. During these sessions, members will be educated on how to file complaints, the expected timelines, and how the SACCO uses their feedback to improve. Members shall be encouraged to ask questions and share concerns in these forums. Additionally, branch offices will periodically host brief info sessions or have informational posters and brochures on-site that explain the complaints process step-by-step for customers who visit the branches regularly but are not active social media users.
- c) **Accessible Information:** We ensure that information about how to lodge a complaint is always easily accessible. Our website has a dedicated page for the Complaints Handling Policy and a simple guide on the process. We also maintain printed brochures/flyers at all branches and include a summary of the complaints process in the new member onboarding packet. All these materials are written in clear language. If need arises, staff shall assist members in understanding the process or even help draft a complaint.

Through these education efforts, the SACCO seeks to empower members to voice their concerns without fear and to foster a culture where feedback is welcomed. We want every member to know what their rights, responsibilities, and obligations are, how to raise an issue, and be confident that the SACCO will handle it properly. Member engagement is an ongoing effort; we will continually seek new ways to raise awareness through the Sacco's communication channels so that no member is left uninformed about the complaints process.

### **13. Technology Integration and Accessibility**

The Sacco utilises the CRM system to manage the complaints handling process.



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#### **a. Accessibility and Persons with Disabilities**

The SACCO shall ensure the complaints process remains accessible to members with disabilities by implementing inclusive practices as follows;

- a) Providing **complaint forms and materials** in accessible formats (e.g., large print, Braille, audio versions) upon request.
- b) Ensuring frontline staff offer personalized assistance to help persons with disabilities lodge complaints effectively, including assistance in form completion or verbal submission recording.
- c) Facilitating alternative communication methods, such as phone-based or face-to-face assistance, for members unable to use standard digital or written channels.
- d) Ensuring physical access to complaint-handling locations, including branch offices and drop boxes, by maintaining wheelchair-accessible paths and clearly marked disability-friendly service counters.
- e) Regularly training frontline and complaints-handling staff on disability awareness and effective communication practices.

#### **b. Balancing Manual and Digital Systems**

In addition to the CRM systems the Sacco shall effectively manage complaints using a structured manual process with basic automation tools like Excel.

### **14. Policy Review and Continuous Improvement**

To keep the Complaints Handling Policy effective and up to date, the SACCO has instituted a regular review cycle and a mechanism for incorporating member feedback:

- a) **Review Cycle:** This policy will be reviewed **Triennially** or in line with our strategic plan cycle by the SACCO Board of Directors and Management. A review ensures that any changes in laws, regulations, or SACCO procedures are promptly incorporated. It also allows us to reflect on the complaints data and make improvements to the process in the period under review. In addition to the scheduled three-year review, interim reviews may be triggered if there are significant changes in regulatory guidelines or if internal audits or findings suggest the need for an update. All revisions to the policy will be approved by the SACCO board of directors.

- b) **Member Feedback on Policy:** In the spirit of a member-centric approach, the SACCO shall actively seek member input on the complaints process and policy. We view our members as partners in shaping a fair and transparent system. As part of each policy review cycle, we will gather member feedback on the complaints handling experience and any recent policy changes. This may be done through short surveys sent via email or SMS, feedback forms available at all FOSA branches, marketing offices and on our website, and by inviting comments during member forums. Members are encouraged to share whether they find the process easy to use, if the timelines are clear, and any suggestions for improvement. All feedback will be documented and considered by the policy review team. Where feasible, constructive suggestions from members will be incorporated into policy updates. This collaborative approach ensures the policy remains relevant and continually improves over time.
- c) **Continuous Improvement:** Beyond formal reviews, the SACCO uses complaints as a source of insight for continuous improvement. Trends or recurring issues identified through our CRM reports will prompt management action— for example, additional staff training, service changes, or new internal controls— to address root causes. We also benchmark our complaints handling against industry best practices and regulatory guidelines regularly to ensure we meet or exceed required standards. Improvements or changes resulting from these efforts will be communicated to members (through the same channels in Section 5) to close the feedback loop, so members see the impact of their input.

Through regular reviews and member feedback integration, this policy remains a “living document.” The latest version of the Complaints Handling Policy will always be available on the SACCO’s website and at our branches. Any significant updates will be communicated to members, and an FAQ or summary of changes will be provided to highlight what’s new.



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## 15. Frequently Asked Questions (FAQ)

To help members understand the Complaints Handling Policy and recent updates, here are answers to some common questions:

### a) How long will it take for my complaint to be resolved?

- i. We aim to resolve complaints within 21 days from the date you lodge the complaint. This includes up to 14 working days for us to investigate the issue and an additional 7 days to finalise and communicate the outcome. In practice, many straightforward complaints are resolved sooner. You will receive an acknowledgement within the first three (3) days, and if we need more time beyond 21 days (for complex cases), we will inform you of the delay and provide a new expected resolution date. Our commitment is to keep you updated throughout the process so you're never in the dark about your complaint's status.

### b) What if I'm not satisfied with the response or my issue isn't resolved?

- i. If you are unhappy with the initial response to your complaint, you can request an escalation. First, ask for the issue to be reviewed by Marketing/Customer Relations Officer. If that doesn't resolve it, you can escalate the matter to head of Business Development and Marketing for further review. Ultimately, if you've gone through all internal escalation levels and still feel the outcome is unsatisfactory, the SACCO shall advise you on how to contact external avenues such as SASRA for additional recourse. We have a structured escalation process (*see Section 9 of the policy*) to ensure your complaint gets the appropriate attention at higher levels of management. Don't hesitate to escalate, we want to get it right and appreciate the opportunity to review decisions.

### c) What are the ways I can lodge a complaint?

- i. You can lodge a complaint in person at any branch, by phone, by email, or through our Sacco website. Choose whatever method is most convenient for you. In person, just speak to an officer who will help document your issue. By phone, call our call centre number +2540111035600, and our team will log your complaint. By email, send details to [complaints@apstarsacco.coop](mailto:complaints@apstarsacco.coop) include your name, member number, and the issue. Online, visit our website's "Complaints" section (<https://apstarsacco.coop/member-service-charter/>) and fill out the

form; you'll get a confirmation. All these channels feed into the same process, so your complaint will be handled promptly regardless of how you submit it. We use a central system (CRM) to track complaints from all sources, which helps us stay organised and responsive.

**d) How will I learn about my rights and the complaint process?**

- i. The SACCO is proactive in educating members about their rights and how to voice concerns. We share information regularly via our newsletters, social media, and member meetings. For example, each quarter we include reminders and tips about the complaints process in the newsletter sent to all members. We also post guides and infographics on our Facebook and Twitter pages periodically, explaining how to lodge a complaint and what to expect. Additionally, during our Annual General Meeting or other member forums, we often have a segment where we discuss member rights, including the right to file complaints and have them addressed. You can always find the full Complaints Handling Policy on our website or ask for a copy at any branch. Our staff are also available to walk you through the process. We want every member to be aware of how to use their voice and assure you that raising a complaint will never lead to any form of punishment or loss of privileges; it's your right as a member.

**e) Can someone else file a complaint on behalf of an aggrieved member or group of members?**

- i. Yes. Complaints may be filed by a representative or third party acting on behalf of an aggrieved member or a group of members, provided the representative has written consent or proper authorisation from the affected member(s). The SACCO shall request proof of authority, such as a signed authorisation letter, before processing the complaint.

**f) What happens when a complaint is already filed in court?**

- i. If a complaint or dispute is already undergoing judicial review (filed in court), the SACCO shall not initiate or continue internal complaint resolution procedures. The matter will instead proceed according to the legal process, and the SACCO shall cooperate fully by providing all required documentation or information requested by the court. The complainant will be informed in writing of the suspension of internal processes due to ongoing legal proceedings.



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**g) Can I give feedback on the complaints process or suggest changes to the policy?**

Yes, absolutely. We welcome member feedback on both the complaints process and the policy itself. You can provide feedback at any time by contacting us— for example, by emailing **complaints@apstarsacco.coop** or filling out a feedback form on our website. We shall also periodically send out brief surveys or ask for feedback during member events about how the complaints process is working for you. All feedback is taken seriously. During the policy review, we look at member comments and suggestions. If multiple members highlight the same concern or propose a useful change, we will consider that in the updated policy. This policy is for you, the member, and we believe it will be most effective when it reflects your needs and expectations. So, your input is not just welcome, it's an important part of how we improve. We will communicate any significant changes that result from member feedback.

## **16. Record Keeping and Monitoring**

The SACCO shall maintain detailed records of all complaints and their resolutions. Each complaint received is logged into our system, capturing information such as the date of receipt, details of the issue, steps taken, communications with the complainant, and the date and outcome of the resolution. These records are retained for a minimum of **seven years**, in accordance with regulatory requirements and internal policies, unless there is an active investigation or legal hold necessitating longer retention.

By analysing these complaint records, the SACCO's management can monitor compliance with this policy—such as verifying adherence to response timelines—and identify trends. Regular reports generated from this analysis are reviewed by senior management and the Board to ensure accountability. Identifying systemic issues or frequent complaints about matters allows us to proactively address underlying problems. Monitoring complaints is also integral to our risk management and quality assurance processes.

## **17. Disposal of Records**

After the retention period of seven years, records that are no longer required are disposed of securely and in compliance with applicable data protection laws and internal policies. This ensures that sensitive information is not disclosed improperly and that we continue to uphold the confidentiality and trust placed in us by our members.

Adherence to these record-keeping and disposal practices ensures that the SACCO complies with Kenyan regulations, maintains operational transparency, and continually improves its services based on comprehensive data analysis.

### **18. Compliance and Oversight:**

The implementation of this policy is overseen by Business Development and Marketing Department. They ensure that staff are trained on the procedures, that timelines are met, and that escalation and resolution are done according to policy. Non-compliance with the policy by staff can result in remedial action. The SACCO may also be subject to audits or inspections by SASRA to verify that we handle complaints appropriately. This policy aligns with all relevant regulatory guidelines on complaints handling, and failure to adhere to required standards can have serious implications for the SACCO's licensing – hence, we treat compliance with the utmost importance.

### **19. Conclusion**

Apstar SACCO values members and their opinions. A robust complaint handling framework reflects our commitment to service excellence and accountability. By updating this policy with explicit timelines, clearer escalation paths, increased member outreach, and better technology use, we aim to make the complaints process easier and more effective for you. We always appreciate feedback and will continue to improve our processes to serve you better. Members are encouraged to speak up knowing that their concerns will be addressed in a timely and fair manner. This policy shall be available to all members and staff, and training will be provided to employees to ensure its effective implementation.

### **20. Policy approval and review**

The SACCO may at its own discretion review, amend or repeal this Membership policy wholly or in part. In amending the policy, management shall have due regard to the following:

- a) The desire to ensure member needs and requirements are made
- b) Any statutory and regulatory obligations.

Reviews and amendments made to this Membership Policy by the management shall be subject to approval by the Board of Directors.



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This Complaints handling Policy document was discussed and approved for implementation with effect from ..... It is approved under MIN..... of **BOARD OF DIRECTORS Meeting held on.....** at the Sacco Society's Boardroom.

APPROVED BY:

Ag. Chief Executive Officer 

Date 07/01/2026

National Chairman 

Date 7/1/25

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## Appendices: Template Forms and reporting forms

### Appendix IV: Reporting forms

#### Form 1: SACCO MEMBER COMPLAINTS REGISTER TEMPLATE

(For Sacco internal use to be used by the officer receiving and processing complaints)

No.	Date Received	Receiving Officer	Name of Complainant	Complaint Issue	Action Taken	Root Cause	Corrective Action	Status (Resolved Ongoing or New)

#### Form 2: QUARTERLY MONITORING AND EVALUATION TEMPLATE

(For submission to SASRA every 15<sup>th</sup> of end of quarter)

No	No of Complaints received	Mode Complaint was lodged	No of Complaints resolved	No of Complaints pending	Duration taken to resolve e.g. spot resolution, 1 day, 7 days, 14 days, 1 month, quarterly, Annual;	Recommendation for system improvement

#### Form 3: SACCO COMPLAINTS ROOT CAUSE ANALYSIS TEMPLATE

(For Sacco internal use – Management and Board reporting tool)

No	Complaint	Officer/department complained against	Nature of the Complaint/service issue e.g., delay	Type of cause-Physical (e.g., system failure), human (e.g., inefficient officers, slow unresponsive) or organization (e.g., policies, procedures, regulations)	Remedy Granted	corrective action/preventive action



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**Form 4: SASRA COMMON SOURCE OF COMPLAINTS QUARTELY REPORTING TEMPLATE**

(For submission to SASRA every 15<sup>th</sup> of end of quarter)

No.	Nature of Complaint	Number received	Root cause of Complaint	Corrective action taken	Number closed
1	Delay in refund of savings/deposits		E.g. Nonadherence to Sacco by laws		
2	Delay in loan disbursement				
3	Access to member statement				
4	Frequent system downtime without notification (electronic access to online platforms)				
5	Forgery on signatures of guarantors				
6	Refund of savings for deceased members to their next of kin				
7	Non-payment of dividends to full and partial withdrawn members				
8	Lack of payment of dividends on housing shares				
9	CRB listing				
10	Irregular FOSA account transactions				

**Note: The Nature of complaints listed are those that the Authority deems persistent based on the complaints received, however, all Sacco complaints are unique and therefore may vary.**

