

**NATIONAL LOTTERIES AND GAMING
REGULATORY BOARD**
Responsible Gaming

COMPLAINTS HANDLING POLICY

MAY 2024

1

NLGRB Complaints Handling Policy, 2024

Three handwritten signatures in blue ink are located at the bottom left of the page. The first signature is a stylized, circular mark. The second is a more complex, looped signature. The third is a signature with a long, sweeping horizontal stroke.

TABLE OF CONTENTS

	1
COMPLAINTS HANDLING POLICY	1
1. Introduction	3
2. Purpose	3
3. Definition of a Complaint	3
4. Procedure on Lodging a Complaint	3
5. Complaints Handling Process	4
6. Review of Policy	7
7. Status of this Policy	8



1. Introduction

Section 4(m) of the Lotteries and Gaming Act 2016 mandates National Lotteries and Gaming Regulatory Board (“the Board”) to receive, investigate and arbitrate complaints relating to lotteries, gaming, betting and casinos and take appropriate action. The Board receives complaints from the operators, punters and any other persons affected by any lotteries, gaming, betting and casino activities and handles them through its Department of Legal and Board Affairs.

2. Purpose

This Policy highlights the Board’s complaint handling process. The Policy has been designed to ensure that complaints received by the Board are managed in a timely, effective, and consistent process that meets the requirements of the Lotteries and Gaming Act, 2016 as amended from time to time.


3. Definition of a Complaint

- a) A complaint refers to an expression of dissatisfaction by any person relating to gaming activities in Uganda.
- b) Who may lodge a complaint?
 - i. An aggrieved punter or patron,
 - ii. An aggrieved licensed Gaming Operator,
 - iii. Any person aggrieved by the activities of a licensed Gaming Operator,
 - iv. Any person aggrieved by the action(s) of any Board staff,
 - v. Any other person aggrieved by any gaming or betting activities in Uganda.

4. Procedure on Lodging a Complaint

The complaint may be lodged in any of the following ways.

- a) Formal Complaints may be lodged by letter with evidence attached addressed to the Chief Executive Officer, NLGRB Post Office Box 5446 Kampala,
- b) By Sending an email to info@lgrb.go.ug stating the complaint with evidence well attached,



- c) By physically visiting the Board's Head or Regional offices and lodging a complaint at the respective reception desks,
- d) By lodging a complaint on the Board's website at www.lgrb.go.ug with evidence well attached,
- e) Any other medium as communicated by the Board from time to time.

5. Complaints Handling Process

A complaints handling process is a structured process for receiving, recording, investigating, responding to, and resolving complaints.

a) Acknowledging and registering

- i. A complaint that is lodged to the Board shall be acknowledged and registered upon receipt.
- ii. A file shall be opened, and a file number issued.
- iii. The Complainant shall be issued with a reference number.

b) Initial Assessment

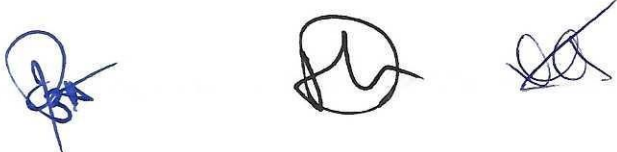
Upon registration of a complaint, the Legal and Board Affairs Department shall assess it to determine the validity and severity by:

- i. Establishing whether the complaint falls within the mandate of the Board,
- ii. Verifying if all channels of resolving the complaint have been exhausted,
- iii. Assessing whether the complaint can be resolved without an investigation,
- iv. Establishing if the matter needs to be investigated and whether additional information or documentation is required to complete an investigation.

c) Assessment Findings

Upon initial assessment, the Legal and Board Affairs department may:

- i. In the case the complaint relates to a Board staff, forward the same to the Department responsible for Human Resources for further action and management.



- ii. In case the complaint relates to a licensed Gaming Operator or any gaming or betting activities in Uganda-
 - 1) Advise that the complaint be investigated.
 - 2) Invite the parties for an interface.
- iii. In case the matter does not fall within the mandate of the Board, the Legal and Board Affairs department may provide an explanation to the complainant and/ or where necessary provide possible details of the institution responsible for the handling of such a complaint.
- iv. In case the complaint is found unwarranted the Legal and Board Affairs department may advise to dismiss the same.

The advice of the Legal and Board Affairs Department shall be recorded and submitted to the Chief Executive Officer.

d) Notification of Complaint

- i. Should the complaint merit further action upon initial assessment, the Board shall notify the Respondent(s) in writing to state his/her/its defense in writing within two (2) working days of receipt of notification.
- ii. The notification may include a request to provide further and better particulars or documentation.
- iii. A copy of the complaint shall also be served on the Respondent(s).

e) Invitation for Interface

- i. Where the parties have been invited to interface with the Legal and Board Affairs Department, they may be given the opportunity to settle the matter amicably through alternative dispute resolution methods such as negotiation or mediation.
- ii. Where the parties resolve to settle the matter amicably, the same shall be recorded and the file closed.
- iii. Where the parties fail to resolve the matter, the complaint shall be referred for arbitration by a Committee nominated by the Chief Executive Officer and chaired by the Senior Manager, Legal and Board Affairs.

f) Investigations

Where the complaint warrants investigation:

- i. A thorough investigation shall be conducted by the Investigations staff, or any Board staff or Government Agency nominated by the Chief Executive Officer. The investigation may include interviews with punters, employee(s) involved, witnesses, the Complainant(s) and the Respondents(s).
- ii. The investigation may be undertaken by the Department responsible for investigations or any other Board staff or Government Agency nominated by the Chief Executive Officer.
- iii. An investigations report will be compiled outlining the findings and recommendations.
- iv. If a complaint against a Gaming Operator is substantiated following an investigation, the parties may be required to either reach a resolution through arbitration.

g) Seeking Technical Advice

Depending on the complexity of the matter and where deemed necessary, the Legal and Board Affairs Department may seek technical advice from other departments or Government Agencies to support resolve the complaint.

- i. **Internal Advice:** Complaints may be forwarded to other departments within the Board to gather facts and seek technical expertise. Complaints against staff shall be forwarded to the Department responsible for Human Resource for further action in line with the Human Resource Manual.
- ii. **External Advice:** Once all the facts about the complaint have been gathered and the complaint is deemed to be complex, the complaint may be referred to another Government agency for further advice.

h) Timelines

- i. A conclusion should have been reached and relevant remedies offered within thirty (30) days of receiving the complaint.

- ii. If the complaint cannot be resolved within 30 days, the Board shall provide feedback to the parties involved, ensuring the parties are informed of the progress and likely timeframes for resolution.
- iii. The Board shall promptly communicate any decision or action to the parties.

i) Remedies

- i. Where a complaint against a Board staff is substantiated following an investigation, disciplinary action shall be taken against the employee in line with the Board's Human Resource Manual.
- ii. Where a complaint against a Gaming Operator is substantiated following an investigation, the parties may be required to either reach a resolution through mediation or negotiation. Where the parties fail to reach a resolution through negotiation or mediation, the Board shall arrive at an appropriate determination as it deems fit through arbitration.
- iii. Where a party is not satisfied with the resolution or decision of the Board, he/she/it shall have the right to seek redress from a Court of competent jurisdiction.

j) Closing the Complaint

- i. Where the Complainant accepts the proposed decision or action, then the decision or actions shall be carried out, recorded and the file closed.
- ii. Where the complainant is dissatisfied with a proposed decision or action, he/she/it may seek an internal review by the Chief Executive Officer and ultimately to the Board Committee responsible for Lotteries and Gaming for determination.
- iii. A person aggrieved by the decision of the Board may seek redress from a court of competent jurisdiction.

6. Review of Policy

The Board shall continually review this Policy for relevance and alignment with relevant gaming sector trends.

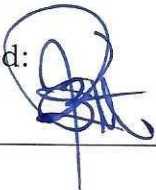


7. Status of this Policy

This Policy is for the use as well as benefit of all stakeholders and represents best practices in Complaints Handling. However, it is not intended to be the only standard of good practice that the Board can follow.

This Policy was approved by the National Lotteries and Gaming Regulatory Board in its 122nd Meeting held on 8th May 2024 under *MIN/122/09/2024/14(b)*.

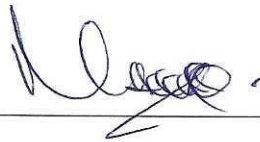
Signed:



DEBORAH M. KITUYI
BOARD SECRETARY



DENIS MUDENE NGABIRANO
CHIEF EXECUTIVE OFFICER



ALOYSIUS MUGASA ADYERI
BOARD CHAIRMAN



Cross References

1. The 1995 Constitution as amended
2. The Lotteries and Gaming Act, 2016 as amended
3. The Employment Act, 2006
4. The Public Standing Orders, 2010
5. The NLGRB Human Resource Manual, 2018