

## Oversight Structures and Adherence to Complaints Management Guidelines in Tanzania's Bahi and Mpwapwa District Councils

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### Abstract

*This study examines how internal and external oversight structures influence adherence to complaints management guidelines in Bahi and Mpwapwa District Councils in Tanzania. Despite national standards requiring designated officers, documentation systems, reporting mechanisms, and routine monitoring, many local government authorities continue to demonstrate weak compliance. Guided by Old Institutional Theory and Compliance Theory, the study adopts a comparative explanatory case study design to assess how formal structures, supervisory practices, and institutional routines shape adherence in two councils operating under the same regulatory framework but exhibiting different performance levels. Data were collected through 71 questionnaires, 37 interviews, document reviews, and observations, and analysed using SPSS and MAXQDA. Findings indicate that although both councils have formal complaint-handling structures, informal departmental routines dominate actual practice, leading to fragmented documentation and weak reporting accuracy. Oversight mechanisms were conducted annually but remained narrow in scope, focusing more on the presence of offices and reported statistics than on verifying compliance quality. Furthermore, low awareness among staff and communities, weak internal communication, and the physical dispersion of offices constrained effective adherence. While Bahi showed relatively better coordination and documentation, both councils largely exhibited symbolic rather than substantive compliance, highlighting the need for improved systems.*

**Keywords:** Oversight; complaints management; complaints management standards; Bahi and Mpwapwa; Tanzania.

### 1.0 Introduction

When customers are dissatisfied with goods or services, they lodge complaints (Stauss & Seidel, 2019). Poorly handled complaints can damage an institution's reputation and undermine public trust (URT, 2011; 2012; 2014; Stauss & Seidel, 2019). Adherence to established standards is therefore essential for improving complaints management processes (Aziz, 2015; ISO 10002, 2018). Scholars emphasise that oversight, through supervision, monitoring, and enforcement, plays a critical role in ensuring adherence to rules, policies, and ethical norms (Madue, 2013; Petizzo & Stapenhurst, 2014; Van der Walddt, 2015; Glenn, 2017). Oversight also influences the effectiveness and efficiency of government initiatives (Ibid). Despite this recognition, many public institutions continue to struggle with weak oversight practices that hinder effective complaint handling.

To understand the institutional expectations surrounding complaint management, it is important to outline the key guidelines that govern these practices in Tanzania. Since 2006, the Government of Tanzania has issued several guidelines that define the expected standards for complaint management in public institutions. These include the Guidelines for Developing Client Service Charters (URT, 2006), the Management Standards Checklist (URT, 2011), the Complaints Management Guidelines (URT, 2012, 2023), the Ethics Compliance Monitoring Guideline (URT, 2014), and the Local Government Structure and Functions Guideline (URT, 2022). Together, they outline the procedures, roles, and oversight responsibilities required for effective complaints handling. They mandate the establishment

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of complaints offices, standardised registers, timely feedback, internal monitoring, and external oversight by bodies such as PO-PSMGG and the Public Service Commission (URT, 2011; 2012; 2019).

Across these documents, adherence requires institutions to build staff awareness, appoint and empower qualified complaints officers, allocate adequate resources, monitor and report performance, integrate complaints management into institutional plans, and standardise procedures (URT, 2011; 2012; 2014; 2023). The guidelines also prescribe operational steps such as receiving, registering, resolving, and forwarding complaints; ensuring collaboration across units; maintaining accessible procedures; and securing top management support (URT, 2012; 2014; 2023). Despite this comprehensive framework, little is known about how oversight practices shape adherence to these guidelines in local government authorities, creating a clear gap that this study addresses.

Empirical studies across various countries reveal persistent challenges in complaints management. Research from Malaysia and Brunei shows inconsistent procedures, limited staff capacity, and inadequate systems for valuing complaints (Aziz, 2015; Yusof, 2021). Studies in Ghana and Nigeria report unresponsiveness, underqualified personnel, and insufficient authority to supervise complaint processes (Acheampong & Domfeh, 2021; Olatunde, Sunday & Niyi, 2020). Tanzanian studies similarly document nonadherence to complaints management guidelines due to weak procedural adherence, limited awareness, and inadequate oversight (Maduhu, 2023; Sengat, 2019; Mramba & Mapunda, 2018; Lubuva, Ngowo, & Sulley, 2018; Mgalula, 2017; Amos, 2016; Sikika, 2013). While USAID (2018) and the URT (2022) reported improvements in a few councils, including Bahi, these studies do not explain why some councils comply while others do not.

This gap highlights a missing analytical link; previous studies have not examined how oversight structures specifically influence adherence to complaint management guidelines, nor have they compared councils with differing adherence outcomes. In Tanzania, Bahi District Council (BDC) has demonstrated improvements in complaints management (USAID, 2018; URT, 2022), whereas Mpwapwa continues to experience persistent weaknesses (Lubuva et al., 2018). However, the oversight mechanisms underlying these contrasting outcomes remain unclear. This confusion creates a need to understand how internal and external oversight structures shape adherence with complaint-handling standards.

Based on this gap, the study addressed the following research question: How do internal and external oversight structures influence adherence to complaints management guidelines in the Bahi and Mpwapwa District Councils?

To answer this question, the study pursued four specific objectives:

1. To examine the structure and functioning of oversight bodies responsible for complaint management.
2. To assess the frequency and nature of oversight activities undertaken in the two councils.
3. To analyse how awareness, documentation, and reporting practices influence adherence to complaints handling guidelines.
4. To compare oversight mechanisms between Bahi and the noncompliant Mpwapwa District Council.

## 2.0 Literature review

### 2.1 Theoretical Review

Understanding adherence to complaints management guidelines requires clarity on several foundational concepts, including grievances related to adherence, the complaint-handling process, and relevant standards. These concepts provide the basis for analysing how oversight structures influence behaviour within public organisations. Two theoretical lenses, Old Institutional Theory and Compliance Theory, are particularly relevant for explaining the mechanisms through which oversight affects adherence in Tanzanian local government authorities.

#### 2.1.1 Adherence

Adherence refers to the extent to which individuals or organisations comply with established rules, standards, and expectations (Hopkins, 2011; Miller, 2014; Etienne, 2010). In public service settings, adherence reflects the extent to which procedures, guidelines, and ethical norms are consistently followed. The literature on adherence reveals that institutional structures, oversight mechanisms, and the clarity of formal rules shape adherence. In this study, adherence is treated as a measurable variable reflected in the presence of complaint management guidelines, documentation practices, reporting systems, and conformity to established procedures.

### 2.1.2 *Grievances*

A grievance is broadly defined as any expression of dissatisfaction with a service, product, system, or decision (Stauss & Seidel, 2019; URT, 2012; 2023). Conceptually, grievances arise when service users perceive a gap between expected and actual service performance. The literature highlights that effective grievance management depends on institutional responsiveness, the accessibility of reporting channels, and organisations' capacity to resolve complaints. In this study, grievances inform measurable variables related to the volume of complaints, the channels through which they are received, and the responsiveness of oversight bodies.

### 2.1.3 *Handling Complaints*

Handling complaints involves the processes and mechanisms through which organisations receive, record, assess, and resolve service-related concerns (Kandampully, 2012; URT, 2011, 2012, 2014, 2023). Conceptually, effective complaint handling requires clear procedures, adequate staffing, and supportive institutional structures. Internal oversight and external monitoring strengthen complaint handling, as this literature emphasises. In this study, complaint handling is operationalised through variables such as the presence of complaint reception offices, documentation systems, and procedures for processing and resolving complaints.

### 2.1.4 *Standards for the Management of Complaints*

Standards represent the minimum requirements and formal expectations that guide complaints management in public institutions (URT, 2006, 2012, 2014, 2023). These standards typically include designated officers, resource allocation, monitoring and reporting mechanisms, and supportive leadership. Conceptually, standards establish the institutional framework for assessing adherence. In this study, standards translate into measurable variables such as the institutionalisation of complaints offices, availability of guidelines, reporting practices, and the extent of managerial support.

### 2.1.5 *Awareness*

Awareness refers to the extent to which staff and community members know about, understand, and can correctly describe the purpose, procedures, and channels of the complaints management system (Alhassan & Asare, 2021). Recent public administration research conceptualises awareness as the level of knowledge that enables individuals to recognise available services and to engage with institutional processes appropriately. (Smith & Jones, 2022). Operationally, awareness is measured through staff knowledge of the existence and purpose of complaint guidelines, ability to identify designated complaint officers, community understanding of where and how to lodge complaints, and familiarity with reporting and documentation procedures.

## 2.2 *Old Institutional Theory*

Old Institutional Theory (Meyer & Rowan, 1970; Zucker, 1977, 1987) emphasises the role of formal rules, structures, and institutionalised practices in shaping organisational behaviour. Institutions adopt formal structures, such as guidelines, reporting lines, and oversight bodies, not only for efficiency but also to maintain legitimacy. In this study, Old Institutional Theory helps explain how formal organisational arrangements (the Public Service Act, Management Standards Checklist, and Complaints Management Guidelines) influence adherence to complaint-handling standards. It also provides a lens for understanding how institutionalised routines within district councils affect adherence.

## 2.3 Compliance Theory

Compliance Theory (Etzioni, 1969; Lunenburg, 2012; Dodge, 2016) focuses on the interactions between high- and low-level actors within organisations. It asserts that the exercise of normative, remunerative, and coercive power shapes adherence. In local government, senior officials, such as district executive directors and division heads, oversee complaints management officers and other staff. This theory helps explain how power dynamics, supervision practices, and enforcement mechanisms influence adherence to complaint management guidelines.

In this study, Old Institutional Theory explains how formal structures, rules, and procedures shape adherence, while Compliance Theory explains how authority, supervision, and power relations influence behaviour. Together, these theories provide a dual lens for interpreting why certain oversight mechanisms lead to adherence while others result in nonadherence.

## 2.4 Conceptual Model

Drawing from these theories, the study adopts a conceptual model in which oversight structures serve as the independent variable influencing adherence to complaint management guidelines. Old Institutional Theory predicts that adherence increases when formal structures and procedures are institutionalised and consistently applied. Compliance Theory predicts that adherence is shaped by the exercise of authority and supervisory power by senior officials. Weak, inconsistent, or poorly institutionalised oversight mechanisms are expected to lead to nonadherence, whereas strong oversight structures and effective supervisory practices are expected to enhance adherence. This conceptual model guides the analysis of how internal and external oversight structures shape adherence in the Bahi and Mpwapwa District Councils.

## 2.5 Empirical Literature

Empirical studies consistently show that adherence to complaint-handling guidelines is essential for effective public service delivery. Following standards efficiently resolves complaints, allowing institutions to restore service quality and strengthen public trust (Stauss & Seidel, 2019). On the other hand, not following the rules leads to weak accountability and reputational damage.

Across countries, several common trends emerge. Studies from Malaysia and Brunei report inconsistent procedures, limited staff capacity, and fragmented complaint-handling structures (Aziz, 2015; Yusof, 2021). Research from Ghana and Nigeria similarly highlights unresponsiveness, inadequate authority to supervise complaint processes, and insufficient resources (Acheampong & Domfeh, 2021; Olatunde, Sunday & Niyi, 2020). These studies collectively point to systemic weaknesses in oversight, documentation, and institutional support.

Tanzanian studies reveal parallel challenges, including nonadherence with guidelines, weak documentation, limited awareness among service users, and inadequate oversight mechanisms (Maduhu, 2023; Sengat, 2019; Mramba & Mapunda, 2018; Lubuva et al., 2018; Mgalula, 2017; Amos, 2016; Sikika, 2013). Although USAID (2018) identified improvements in a few councils, such as Bahi, most local government authorities continue to struggle with institutionalising complaint management practices.

A cross-country synthesis shows that the challenges observed in Tanzania are not unique; they mirror broader patterns in developing administrative systems where oversight structures are weak or inconsistently applied. However, the international studies also demonstrate that improvements are possible when oversight is strengthened, communication is enhanced, and leadership commitment is visible. These insights help frame the Tanzanian case by showing that oversight is a decisive factor in shaping adherence.

Taken together, the reviewed studies show that weaknesses in oversight, documentation, and institutional support are common across countries and are also evident in many Tanzanian local government authorities. In Tanzania, the literature does not explain why some councils demonstrate improvements in adherence while others continue to struggle, despite operating under the same national guidelines and regulatory framework. This gap provides a clear rationale for examining the Bahi and

Mpwapwa District Councils. Bahi has been identified as one of the few councils that have made notable progress in implementing complaints management standards (USAID, 2018; URT, 2022), whereas Mpwapwa continues to exhibit persistent weaknesses (Lubuva et al., 2018). Comparing a compliant and a noncompliant council within the same administrative and legal environment offers a strategic opportunity to understand how oversight structures shape adherence. This comparative logic directly addresses the gap in the literature by revealing the mechanisms through which oversight influences adherence outcomes.

### 3.0 Research Methodology

The study adopted a comparative explanatory case study design, which is appropriate for examining how and why oversight duties influence adherence to complaint management guidelines across two contrasting local government authorities. Case study scholars note that explanatory case studies are well-suited for investigating causal mechanisms within real-life contexts (Yin, 2014; Baxter & Jack, 2008). At the same time, comparative case approaches enable researchers to analyse similarities and differences across cases, thereby strengthening analytical explanations (Stake, 2006; Ragin, 2014). Bahi District Council was selected because previous assessments reported improvements in complaints management, while Mpwapwa District Council was chosen due to persistent weaknesses. Comparing a compliant and a noncompliant council within the same administrative and regulatory environment allowed the study to explain the mechanisms through which oversight shapes adherence. This design, therefore, aligns with both the explanatory purpose of the research and its comparative logic.

#### 3.1 Study Sites and Case Selection

Bahi and Mpwapwa District Councils were purposively selected based on contrasting performance in complaints management. Bahi had been recognised for making progress in adhering to complaint-handling standards (USAID, 2018; URT, 2022), while Mpwapwa had been linked to deteriorating complaint management systems (Lubuva et al., 2018). This contrast provided an opportunity to examine how oversight practices contribute to divergent adherence outcomes. Both councils are in the Dodoma Region and follow the same rules and laws that govern Tanzanian Local Government Authorities (LGAs). These include the Constitution of the United Republic of Tanzania and key legislation such as the District Authorities Act of 1982, Urban Authorities Act of 1982, Local Government Financial Act of 1982, Local Government Service Act of 1982, Local Government Negotiation Machinery Act of 1982, and the Regions and Districts Establishment Procedure Act of 1994. Because they have similar structures and responsibilities, they are good examples for examining oversight and adherence in decentralised governance systems (Gerring, 2016).

#### 3.2 Sampling Procedures

Two categories of participants were involved in the study. Interview respondents and questionnaire respondents. Purposive sampling was used to select 37 key informants for interviews in Bahi, Mpwapwa, the Dodoma Regional Administrative Secretariat, and the President's Office, Public Service Management and Good Governance. In the district councils, key informants for interviews included division and unit heads, District Executive Directors (DEDs), TASAF personnel, a former Bahi District Executive Director, and an ICT officer. 19 interview cases were selected from BDC and 16 from MDC. These individuals were chosen because of their direct involvement in complaints management and their ability to provide rich, experience-based insights (Sekaran & Bougie, 2025). To strengthen credibility, additional confirmation or disconfirmation interviews were selected: one from the President's Office, Public Service Management and Good Governance (PO-PSMGG), and the other from Dodoma Region Administrative Staff Services (DRAS). The one from the PO-PSMGG was included in the BDC list, bringing it to 20, while the other from DRAS was included in the MDC list, bringing it to 17. This method was based on the work of Grey (2017) and Teddie and Tashakkori (2009), who argue that selecting respondents who can confirm or challenge new findings strengthens qualitative analysis. Although the initial plan was to use systematic sampling for questionnaire administration, the final approach aligned more closely with a census strategy. Given that the total number of eligible staff at

both BDC and MDC headquarters was fewer than 100, it was methodologically appropriate to administer questionnaires to all available staff rather than draw a sample (Sekaran & Bougie, 2025; Bhattacharjee, 2012; Neuman, 2014). The total population for the BDC was 88 employees, but 19 had already been interviewed, and 25 were out of the office for various official and personal reasons, such as travel, leave, and illness, leaving 63 employees. The remaining sampling frame for the questionnaire was only 44 (63-19), which was less than 100. In the MDC, the total number of employees was 85; 37 were out of the office for reasons similar to those at the BDC, and 16 were interviewed, leaving a remaining sampling frame of 48. On this ground, the sampling frame for the questionnaire was only 32 (48-16), which was less than 100. The census approach is consistent with methodological recommendations that, when a target population is small, a census approach is appropriate. The census approach enhances representativeness and eliminates sampling error (Bhattacharjee, 2012; Neuman, 2014). Accordingly, after excluding interview participants and staff who were on leave or official travel, all remaining employees at each council were given questionnaires. This ensured full coverage of the accessible population and maximised response rates.

Anonymised names were assigned to all sampled respondents to protect their identities. Instead of official, proper names, interviewees were assigned codes, and the term “respondents” was used for questionnaire participants. From BDC, interviewees numbered 1 to 20 were coded as BCASE1, BCASE2, up to BCASE20, while from MDC, the numbering continued from 21 to 37. So, from MDC, interviewees were coded as MCASE21 through MCASE37.

### **3.3 Data Collection Methods**

Data were collected through questionnaires, interviews, document reviews, and observations. In total, 71 questionnaires were completed across the two councils. Additionally, 37 interviews were conducted: 19 from BDC and 16 from MDC headquarters. Two respondents for confirmation or disconfirmation were sampled, one from the PO-PSMGG Dodoma offices and the other from the DRAS. All these made a total of 37 interviewees. The questionnaire was structured around four oversight structures, including the complaints reception office, oversight bodies, oversight activities, and the frequency of oversight. The interview guide included six thematic areas: availability of complaint management rules, awareness-raising efforts, oversight strategies, and functioning of complaint-handling structures. Document reviews covered client service charters, complaints management reports, Council Management Team minutes, organisational structures, and strategic plans. These documents were examined to verify the existence of complaint management systems and assess whether complaint handling was prioritised institutionally.

### **3.4 Data Analysis**

Quantitative data were analysed using SPSS version 16, focusing on frequency and percentage distributions appropriate for nominal and ordinal variables. Qualitative data were analysed using MAXQDA Analytics Pro 2022 (Release 22.5.0). Interview transcripts were coded inductively to generate themes related to oversight practices, awareness, and adherence. Interactive quotes and thematic clusters were developed to deepen understanding of how oversight structures influenced adherence to complaint-handling guidelines.

### **3.5 Reliability and Validity**

Instrument validity and reliability were enhanced through expert review and pilot testing. Questionnaires were pretested at the Ilala City Council. At the same time, interview guides were reviewed by former heads of departments from the Kinondoni Municipal Council and the Ilala City Council, as well as by a former Mkuranga District Executive Director. Feedback led to the refinement of questions for clarity and consistency. Triangulation across multiple data sources, such as interviews, surveys, documents, and observations, further strengthened the credibility and dependability of the findings. The use of respondents' confirmation and disconfirmation also enhanced validity.

## **4.0 Findings**

This section presents the findings, which are organised into four themes. The first theme is the structure of complaint handling; the second is oversight practices; the third is awareness and communication; and the fourth is a comparison of performance between Bahi and Mpwapwa District Councils.

## Structure of Complaints Handling

Respondents were asked about the office responsible for receiving, registering, and initially resolving grievances. 24 respondents (56%) in the BDC reported that "each department" received complaints, while only 7 respondents (17%) identified the complaints desk as the source. A similar pattern emerged in MDC, where 20 respondents (69%) selected "each department," and only 8 respondents (28%) selected the complaints desk. These findings mirror earlier observations by Lubuva et al. (2018), who noted that complaints often bypass formal channels. On the other hand, interviews confirmed this departmentalised pattern. On August 12, 2022, interviewee MCASE27 said, "The appropriate departments received complaints; people went to the registry office and were told to go to a certain department."

Despite the perceived efficiency of this approach, it resulted in significant information gaps. Document review revealed that during the 2022 compliance inspection, only two complaints were recorded at MDC headquarters and seven at BDC, despite evidence that departments had handled many more cases. For example, the BDC's land department recorded 98 complaints in its register for 2020–2021, yet only 10 appeared in the official complaints report submitted to Dodoma regional offices for the same period. This discrepancy illustrates how decentralised complaint reception undermined the accuracy of documentation and reporting.

Document review also noted 12 complainants following up on cases at the BDC complaints office, 11 of whom had lodged complaints between 2007 and 2020. In 2022, only one new complaint was filed, indicating that reporting and follow-up remain inconsistent. Moreover, the document review revealed that the BDC complaints register was not used between 2017 and the data collection period (July and August 2022). Similarly, in MDC, registers were used in 2018 and 2019. It was not used in 2020, except in June, July, and December 2021. Reviewing the appointment letter, the complaints management officer at MDC was appointed on January 9, 2020, but recorded no complaints for almost 1.5 years.

## 4.1 Oversight Practices

Survey results indicated that most respondents believed oversight activities were conducted. In the BDC, 32 respondents (78%) selected "yes," while 17 respondents (57%) in MDC did the same. However, 22% of BDC respondents and 43% of MDC respondents reported that no oversight occurred. Interviews clarified this contradiction. Oversight was indeed conducted annually, but it was limited in scope and focused primarily on confirming the existence of offices and statistics rather than verifying their accuracy. As an interviewee at BCASE20 on the 18th of August 2022 explained, "We verify that public institutions adhere to the codes of ethics and ethical infrastructure... The existence of a complaints management office and complaints management statistics are the two things we look for when monitoring adherence."

This narrow focus contributed to poor inspection outcomes. Several department heads reported that inspectors relied on a single source of information and did not consult all relevant offices. BCASE9 on the 26th of July 2022 noted: "Those USAID people used to come here, speak with the human resource office, and leave... That office... Madame... was unable to reveal the truth." (CASE9, 26 July 2022) Respondents also identified multiple oversight bodies. In BDC, 30 respondents (86%) selected the District Human Resource Office, while only 5 respondents (14%) selected the PO PSMGG, the mandated external oversight body. In MDC, 13 respondents (67%) selected the District Human Resource Office, and 8 respondents (28%) selected the office of the District Executive Director. Interview cases revealed that complainants frequently approached the District Executive Director directly, bypassing the complaints office. Interview MCASE23 on the 15th of August 2022 explained, "You cannot ignore a complaint once it has been brought to your attention... I will hold the village chairperson accountable who spent the funds without the residents' approval. However, the researcher observed that such grievances were not documented, resulting in further data loss."

In MDC, structural challenges also affected oversight. The complaints management office was located far from the main offices, creating challenges for communication and oversight. The interview with MCASE22 on the 12th of August 2022 confirmed: “It takes me roughly 11 minutes to walk to my office... I am unable to move from my office to the complaints management office.” This physical separation contributed to weak coordination and inconsistent reporting, resulting in ineffective complaint management practices, such as offices always being closed.

### **4.2 Awareness and Communication**

Awareness of complaints management procedures was low in both councils. The interview data showed four common themes: (1) communities that do not know enough, (2) citizens who learn on their own, (3) a lack of complaint management guidelines, and (4) bad communication. Across all interviews, 12 cases (44%) mentioned uninformed communities, 21 cases (78%) highlighted the absence of guidelines, 10 cases (37%) cited poor communication, and 8 cases (30%) described citizens educating themselves. Several interviewees explained that citizens often relied on informal inquiries to navigate the system: For example, MCASE5 on the 26th of July 2022 confirmed, “Usually, people ask before coming to the Council... After receiving information from fellow citizens, they approach the appropriate department directly.

Furthermore, interview cases confirmed the absence of guidelines; MCASE26, on the 13th of August 2022, reported, “As auditors, we have not found any guidelines here on the side of complaints management.” While MCASE24 on the 16th of August 2022 revealed that “All right, let me admit that we do not have the client service charter. Poor internal communication further weakened awareness. One MCASEA27 on the 12th of August noted, “There was an officer and a desk for managing complaints, but the officer retired in 2020; since 2020, no complaints management officer has been in place.”

Physical dispersion of offices also contributed to communication challenges. The researcher observed that walking distances between key council offices in MDC ranged from 10 to 15 minutes, limiting coordination. Additionally, neither council displayed notice boards, flyers, or signage indicating the location or purpose of the complaints office. In MDC, the suggestion box was placed outside the main fence and was rarely used.

### **4.3 Comparative Performance of Bahi and Mpwapwa**

Although Bahi performed better than Mpwapwa in documentation and reporting, both councils demonstrated low overall adherence with national guidelines. Bahi’s relative advantage stemmed from more complete departmental records and slightly stronger internal coordination. However, both councils lacked standardised procedures, consistent documentation, and effective communication. Oversight frequency also differed. In Bahi, 27 respondents (84%) reported annual oversight, consistent with national guidelines. In Mpwapwa, responses varied: 14 respondents (50%) selected “monthly,” 8 (27%) selected “quarterly,” and 6 (21%) selected “once per year.” This inconsistency reflected confusion between mandated and customised oversight procedures. Furthermore, document reviews revealed undocumented grievances, as complaint registers were not used in either BDC or MDC.

Across both councils, inductive thematic analysis revealed four common complaint-handling practices. One was the left means (complaints not included in CMT agendas) and was confirmed in 30 cases (86%). The second was the diversion means (complaints reported to any office) and was confirmed in 27 cases (77%). The third was expert means (resolving concerns without guidelines), confirmed in 20 cases (57%), and the fourth was efficiency means (not exempting complaints officers), confirmed in 17 cases (49%). These patterns indicate that while Bahi showed relatively better performance, neither council met the expected standards of adherence.

## **5.0 Discussion**

This study examined how oversight structures influence adherence to complaints management guidelines in Bahi and Mpwapwa District Councils. The findings reveal that although both councils have formal structures for handling complaints, their practical implementation is shaped by institutional

routines, limited awareness, weak communication, and inconsistent oversight. Drawing on Old Institutional Theory and Compliance Theory, this section discusses how these factors interact to produce the observed patterns of low adherence.

## **5.1 Complaints Handling Structures**

The findings revealed institutional routines and the persistence of informal practices. Old Institutional Theory emphasises how established routines and norms shape organisational behaviour, often overriding formal rules. The results indicate that both councils predominantly used department-based mechanisms to receive complaints, despite the presence of formal complaints offices. This informal practice persisted because it was perceived as faster and more convenient, even though it undermined documentation and reporting. The large discrepancies between departmental registers and official complaint reports, such as Bahi's 98 land complaints versus only 10 reported, illustrate how informal routines displaced formal procedures. These patterns reflect institutional path dependence: once departments became the default entry point for complaints, the practice persisted even when guidelines required centralised handling.

## **5.2 Oversight Practices**

The results found oversight to be a procedural rather than a substantive mechanism. Compliance Theory suggests that organisations comply when oversight is credible, consistent, and capable of detecting nonadherence. In this study, oversight was conducted annually as required, yet it remained procedural rather than substantive. Inspectors focused on checking the existence of offices and statistics rather than verifying accuracy. This method created an environment of compliance where councils could appear compliant without meeting the substantive requirements of the guidelines. The interviews revealed that inspectors relied on a single information source and did not consult all relevant departments, while document review revealed unused registers. This limited approach reduced the likelihood of detecting discrepancies, weakening the incentive for councils to maintain accurate records. As a result, oversight existed in form but not in function, which explains why respondents simultaneously reported that oversight occurred and that it was poor.

## **5.3 Awareness and Communication**

The study found that awareness and communication were determinants of adherence. Awareness emerged as a critical factor influencing adherence. Staff and community members lacked knowledge of complaint procedures, guidelines, and the location of complaint offices. The absence of client service charters, signage, and internal communication further contributed to low awareness. From a compliance perspective, awareness is a precondition for rule-following. When staff do not know the procedures, and citizens do not know where to lodge complaints, adherence becomes accidental rather than intentional. The finding that citizens often "educated themselves" by asking fellow citizens and inquiring at the registry highlights the lack of established communication mechanisms. Physical dispersion of offices, particularly in MDC, exacerbated communication challenges. Long walking distances between main council offices and the annexes limited coordination and contributed to inconsistent reporting. These structural barriers reinforce the argument of Old Institutional Theory that organisational arrangements shape behaviours and can impede the adoption of new practices.

## **5.4 Comparative Performance of Bahi and Mpwapwa**

Although both councils demonstrated low overall adherence, Bahi performed better relative to Mpwapwa. Variations in internal coordination and documentation practices can explain this difference. Bahi maintained more complete departmental records and had slightly stronger internal communication, which contributed to better reporting during inspections. However, Bahi's "better performance" was relative rather than absolute. Both councils lacked standardised procedures, consistent documentation, and effective communication. Both relied on informal practices such as diverting complaints, including complaints against officers, and resolving issues without guidelines. These shared patterns indicate systemic institutional weaknesses rather than isolated council-level failures. The interaction between oversight and institutional context explains the overall low adherence observed in both councils.

Oversight was too narrow to detect substantive nonadherence, while institutional routines favoured informal practices. Low awareness and weak communication further reduced the likelihood of following formal procedures. In this environment, adherence became symbolic rather than substantive. Councils complied with the visible aspects of the guidelines, such as having a complaints office, while neglecting the functional aspects, such as accurate documentation, reporting, and staff awareness. This aligns with Compliance Theory's distinction between formal adherence (meeting visible requirements) and substantive adherence (meeting the intended purpose of the rules).

## 6.0 Conclusion and Recommendations

### 6.1 Conclusion

This study examined how oversight structures influence adherence to complaints management guidelines in Bahi and Mpwapwa District Councils. The findings demonstrate that oversight shapes adherence not simply through its presence, but through its quality, scope, and institutional embeddedness. Oversight was conducted once a year, as it should have been. However, it was still too narrow, too procedural, and too focused on verifying the existence of offices and statistics rather than ensuring that departmental records were correct. As a result, oversight created incentives for symbolic adherence, meeting visible requirements, rather than substantive adherence, which involves following procedures as intended. Drawing on Old Institutional Theory, the study shows that long-standing routines, such as receiving complaints directly in departments, persisted because they were convenient, familiar, and embedded in daily practice. These routines displaced formal procedures and limited the effectiveness of oversight. From a Compliance Theory perspective, oversight lacked the credibility and depth needed to detect nonadherence, reducing the motivation for councils to maintain accurate documentation and strengthen internal coordination. The interaction between weak oversight, entrenched informal practices, and low awareness explains why both councils demonstrated low overall adherence, despite BDC performing relatively better. Oversight affected adherence by changing how councils saw what was important. When oversight focused on visible structures rather than substantive processes, councils prioritised appearance over precision. Thus, the central argument of this study is confirmed: oversight influences adherence not by its frequency, but by the extent to which it interrogates actual practice, challenges institutional routines, and reinforces procedural standards.

This study contributes significantly to both theory and practice. Theoretically, it advances understanding of how oversight structures influence adherence to administrative guidelines by demonstrating that adherence is shaped not only by the presence of oversight mechanisms but also by their substantive depth, credibility, and interaction with institutional routines. By integrating Old Institutional Theory with Compliance Theory, the study provides a novel explanation of how entrenched informal practices can persist despite formal oversight and how symbolic adherence emerges when oversight focuses on visible structures rather than actual processes. Practically, the study contributes to improving complaint management approaches in local government authorities by identifying specific institutional and operational barriers that undermine adherence. The findings emphasise the need to shift from procedural to substantive oversight, strengthen internal communication, enhance staff and community awareness, and institutionalise standardised procedures. These insights offer actionable guidance for policymakers, oversight bodies, and council administrators seeking to improve the effectiveness, accessibility, and accountability of complaints management systems.

The study also identifies several variables that shape adherence to complaint management practices, offering deeper causal and contextual insights into the observed low adherence. First, the substantive depth of oversight emerged as a critical determinant. When inspections focus narrowly on the existence of offices and statistics rather than on verifying departmental records, they incentivise symbolic rather than substantive adherence. Second, institutional routines, particularly the long-standing practice of receiving complaints directly in departments, undermined the adoption of formal procedures. Third, staff and community members' levels of awareness influenced whether complaints were channelled through official mechanisms. Fourth, internal communication and coordination affected the accuracy and completeness of documentation, especially in MDC, where offices were physically dispersed. Finally, structural accessibility, including the location and availability of complaints officers,

shaped citizens' ability to use formal channels. Together, these variables explain why low adherence persists and highlight the mechanisms through which oversight interacts with institutional context to influence adherence.

## 6.2 Recommendations

The study's theoretical insights and empirical findings directly inform the recommendations below. Each recommendation follows from specific evidence demonstrating how oversight structures, institutional routines, and levels of awareness influence adherence to complaint management guidelines.

*Strengthen the substantive depth of oversight:* Since the compliance inspectors relied on a single information source and did not verify departmental records, resulting in major discrepancies (Bahi's land department recorded 98 complaints, yet only 10 were reported), and interviewees confirmed that inspectors "spoke with the human resource officers and left," without consulting other units, oversight was procedural rather than substantive, encouraging symbolic adherence. Based on the findings, this study recommends that internal and external oversight bodies should cross-check departmental registers, interview multiple units, and verify the completeness and accuracy of complaints data to ensure substantive adherence.

*Institutionalise standardised complaint management procedures:* The study revealed that both councils handled complaints informally at the departmental level, bypassing the complaints office. This approach led to inconsistent documentation and missing records, as seen in Mpwapwa's two recorded complaints despite active departmental handling. This practice indicates that informal routines replaced formal procedures due to a lack of clear guidelines. Therefore, the study recommends that BDC and MDC adopt and disseminate standardised complaint-management guidelines and client-service charters to ensure uniform procedures across departments.

*Improve staff and community awareness:* Interviewee cases reported that citizens "educated themselves" by asking fellow citizens and staff at the registry, who acknowledged the absence of guidelines and client service charters. No signage or notice boards existed in either council. Interpreting the findings, this study acknowledges that low awareness undermines substantive adherence and increases reliance on informal navigation. It concludes by recommending that Bahi and Mpwapwa district councils conduct regular staff briefings, install visible signage, and provide community education on complaint procedures to enhance awareness and promote the correct use of formal channels.

*Enhance internal communication and coordination:* Empirical evidence has shown that complaints management offices in MDC were physically dispersed, requiring 10–15 minutes of walking between units. The complaints officer's location, far from the central offices, hindered his ability to perform his duties effectively, and staff reported poor communication. Interpreting the findings, this study comments that weak communication reinforces informal practices and limits the effectiveness of oversight. Furthermore, the study recommends that BDC and DC establish structured communication channels and ensure that complaint officers are centrally located and accessible to improve coordination and information flow.

*Integrate complaints management into routine administrative processes:* Empirical evidence from surveys and interviews revealed that Council Management Team (CMT) meeting agendas lacked complaints, and complaints officers were excluded from routine decision-making. Inductive analysis confirmed that complaints were absent from 86% of CMT meeting agendas. This indicates that when complaint management is not institutionalised, adherence tends to be symbolic rather than substantive. Based on the findings, the study recommends that BDC and MDC should include complaints management as a standing agenda item in CMT meetings and ensure that complaints officers participate in routine administrative processes.

*Strengthen the role and accessibility of complaints management officers:* In Mpwapwa, the complaints officer stated that the office was 900 meters away and was rarely used. The complaints office was often closed, and complainants approached the District Executive Director directly. This indicates that structural barriers reduce accessibility and weaken the documentation and follow-up processes. The

study recommends that BDC and MDC ensure the use of the complaints management office located at the centre of administrative areas and that officers are available during working hours and days to improve accessibility and documentation.

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