

समस्त कार्यालय

दिनांक : 25.04.2024

निरीक्षण एवं अंकेक्षण विभाग परिपत्र संख्या 38/2024

विषयः शिकायत निवारण नीति 2024–25.

1. बैंक की शिकायत निवारण नीति निदेशक मंडल द्वारा 68वीं मीटिंग के दौरान अनुमोदित की गई थी एवं निरीक्षण एवं अंकेक्षण विभाग के परिपत्र संख्या 13/2023 दिनांक 31.03.2023 के माध्यम से परिचालित की गई थी। इस नीति की समीक्षा निदेशक मंडल द्वारा दिनांक 15.04.2024 को आयोजित 75वीं मीटिंग के दौरान की गई एवं संशोधित शिकायत निवारण नीति इस परिपत्र के अनुलंग्नक के रुप में संलग्न है।

2. यह नीति इसके अनुमोदन के दिन यानि कि दिनांक 15.04.2024 से प्रभावी होगी।

महा प्रबंधक (रोहित निझावन)



#### Email: hoinspshgb@shgbank.co.in

#### TO All OFFICES

Date : 25.04.2024

#### INSPECTION & AUDIT DIVISION CIRCULAR NUMBER 38/2024

#### Reg: Grievance Redressal Policy 2024-25.

1. The Grievance Redressal Policy of the Bank was approved by the Board of Directors in its 68<sup>th</sup> meeting held on 27.03.2023 and Circulated vide I&AD Circular No. 13/2023 dated 31.03.2023. The subject policy has been reviewed by the Board of Directors during the 75<sup>th</sup> Meeting held on 15.04.2024 and the revised policy is enclosed as Annexure to this Circular.

2. The policy will come into force from the date of approval by Board of Directors i.e. with effect from 15.04.2024.

General Manager (Rohit Nijhawan)

## **GRIEVANCE REDRESSAL POLICY FOR FINANCIAL YEAR 2024-2025**

## **Division: Inspection & Audit Division**

### **Version :** 2024\_IAD\_1.0

## **Policy Custodian**

Division	Inspection & Audit Division
Officer in-charge	Divisional Head
Policy Contact	hoinspshgb@shgbank.co.in

## **Policy Governance**

Frequency Of Review	Annually or as and when required
Last reviewed on	Board 27.03.2023
Approval Path	Standing Committee on Customer Service $\rightarrow$
	Customer Service Committee of Board $\rightarrow$ Board
Supersedes	IAD, HO Circular 13/2023 dated 31.03.2023

#### DETAILS OF CONTENTS

S. No.	Particular	Page No.	
1	Policy Version and other details/Contents	1	
2	Policy overview	3	
3	Policy Details		
4	Objective		
5	Scope and Applicability		
6	Policy Contents		
7	Authority for Operational Guidelines		
8	Disclosure of the Policy		
9	Ownership of the Policy		
10	Validity and Review of the Policy		
11	Reporting		
12	Relaxation/Deviations/Exclusions		
13	Operational Guidelines	10-13	
	Annexure		
A	Standard Operating Procedure (SOP) for Dealing Banking Ombudsman Complaints	14-17	
В	Frequently Asked Questions	18	

#### **GRIEVANCE REDRESSAL POLICY**

#### 1. Policy Overview

In the present scenario of competitive banking, excellence in customer service is the most important tool for sustained business growth. Customer complaints are part of the business life of any corporate entity as every business has to deal with situations in which things go wrong from a customer's point of view. This is more so for Banks being service organizations. As a service organization, imparting good customer service and enhancing level of customer satisfaction is the prime concern of any bank. Providing prompt and efficient service is essential not only to attract new customers, but also to retain existing ones. Customer dissatisfaction would spoil bank's name and image which will result in loss in business.

The Bank's policy on grievance redressal follows the under noted principles.

a) Customers be always treated fairly.

b) Complaints raised by customers are dealt with courtesy and on time.

c) Grievances of pensioners and senior citizens are dealt on priority.

d) Customers are fully informed of avenues to escalate their complaints/grievances within the organization and their rights to alternative remedy, if they are not fully satisfied with the response of the bank to their complaints.

e) Bank will treat all complaints efficiently and fairly as they can damage the bank's reputation and business if handled otherwise.

f) The bank employees would work in good faith and without prejudice to the interests of the customer.

The policy will come in force from 15.04.2024.

#### 2. Policy Details

#### 2.1. Background:

To make Bank's Grievance Redressal Mechanism more meaningful and effective, a structured system has been built up towards such an end. This system would ensure that the redressal sought is just and fair and is permissible within the given framework of rules and regulation.

The Policy is based on the guiding principle enlisted in the RBI "Master Circular on Customer Service in Banks" circulated vide RBI/2013-14/589 RPCD.CO.RRB.BC.No.100 / 03.05.33/2013-14 dated May 12, 2014.

#### 2.2. Objective:

To establish a robust system which will streamline the resolution of Customer Grievances in the shortest possible time and adhere to various Statutory/Regulatory Guidelines on the subject matter.

#### 2.3. Scope and Applicability:

The Grievance Redressal Policy shall cover the Grievance Redressal function of all the Offices of the Bank.

#### 2.4. Policy Contents:

The Grievance Redressal Policy, in terms of the RBI Master Circular on Customer Service in Banks circulated vide RBI letter dated 12<sup>th</sup> May, 2014, includes the following aspects:

#### 2.4.1. Definition of Grievance:

A Grievance is an expression of dissatisfaction made to an organization, related to its products, or services, or the complaints' handling process itself, where a response or resolution is explicitly or implicitly expected.

#### 2.4.2. Major reasons for Customer Complaints:

2.4.2.1. Attitudinal/Behavioural aspects in dealing with Customers;2.4.2.2. Operational aspects- Inadequacy of the working/operations or gaps in standards of services expected and actual services rendered.2.4.2.3. Technology Related

#### 2.4.3. Right to Grievance Redress:

The customer has the right to register his Grievance if he is not satisfied with the services provided by the Bank. A customer may lodge Grievance either in writing or through electronic means if he is not satisfied with the services provided by the Bank. All complaints will be recorded by the Bank in a database. The database, along with the acknowledgement letter and other correspondence will be preserved at least for 3 years for future reference. However, no action will be taken on anonymous/ pseudonymous complaints and the same will be filed as per guidelines issued by Central Vigilance Commission.

There are four main ways to raise Grievance – in person, by telephone, by mail/post or by e-mail/internet. Complaints received through all these channels must be handled efficiently and swiftly. If the complaints are not resolved within 30 days or in case the customer is not satisfied with the service or redressal provided by the bank, he can also approach the RBI Ombudsman as per the Integrated Ombudsman Scheme, 2021 for redressal. The contact details of the RBI Ombudsman are available on website and displayed at each Branch. The complainant can also resort to other legal avenues available for grievance redressal.

#### 2.4.4. Resolution of Grievances:

#### 2.4.4.1. Grievances related to attitudinal aspects:

a) Such complaints shall be handled courteously, sympathetically and above all swiftly.

b) Misbehaviour/rude behaviour with customers shall be treated at Zero Tolerance Level and immediate action be taken. Bank, under no circumstances shall tolerate misbehaviour of any degree by our staff members.

c) To keep the complaints related to misbehaviour/rude behaviour at a Zero-Tolerance Level, stern action/ disciplinary action against the erring officials would be initiated by the respective Disciplinary Authority.

d) All such complaints shall be closed after analysis of CCTV Footage/ Investigation.

#### 2.4.4.2. Grievances relating to transactions/operations:

Primarily, the Branch is responsible for the resolution of complaints/ Grievances in this category. Branch would be responsible for ensuring rectification of entry / transaction or satisfaction of customers. It is the foremost duty of the branch to see that the Grievance is resolved to the customer's satisfaction and if he/ she is not satisfied, then to provide him/ her with alternate avenues to escalate the issue. In case, it is not getting resolved at branch level, they can refer the case to Regional Office for guidance/resolution. Similarly, if Regional office finds that they are not able to solve the problem, such cases may be referred to Principal Nodal Officer at Head Office.

#### 2.4.4.3. Grievances related to Digital Transactions:

Considering customers' expectations and lack of familiarity with alternate delivery channels (ATMs, Internet Banking, and Mobile Banking), the Bank has considered exclusive mechanism for redressal of grievances arising from use of these channels.

#### 2.4.5. Grievances Redressal Escalation Matrix:

Customers may primarily approach the Hall In-charge / Branch Manager in case of any grievance. The customer may also approach Regional Office concerned or Divisional Head, Complaints and Concurrent Audit Division or for matters related to ATM-cum-Debit Cards call at Toll Free number - 18001807777.

Customer can submit complaint by post or through e-mail on 'shgbcomplaints@ shgbank.co.in'. Complaints received by e-mail shall be acknowledged by e-mail. Contact Number and E-mail address of the Principal Nodal Officer is provided at the Branches and also on bank's website www.shgb.co.in.

#### **2.4.6. Time frame for resolution of Customer Grievances:**

**2.4.6.1.** Complaints are to be seen in the right perspective because these indirectly reveal a weak spot in the working of the bank. Complaints received would be analysed from all possible angles. Bank will endeavour to send an acknowledgement/response within three working days from date of receipt of complaint.

#### 2.4.6.2. Turnaround Time (TAT)

Bank will endeavor to redress complaints within a maximum period of 15 working days. Further, in case of Complaints requiring some time for examination of issues involved/ detailed investigations; final response or explanation for further time required, will be sent by the Bank within 30 days of receipt of complaint. In the event of complaints involving fraud, redressal will be as per FRMD Policy/ RBI guidelines. However, specific TAT as stipulated by NPCI, RBI, other regulatory authorities and CPGRAM /INGRAM shall be adhered to.

**2.4.6.3.** The guidelines with differentiated TAT for various categories of Customer Grievances have been outlined in the Operational Guidelines (Annexure) of this Policy.

#### 2.4.7. Review Mechanism:

#### 2.4.7.1. Customer Service Committee of the Board:

This sub-committee of the Board chaired by the Chairman / Director and including representatives of customers as invitees to enable the bank to formulate policies and assess the compliance thereof internally with a view to strengthening the corporate governance structure in the banking system and also to bring about ongoing improvements in the quality of customer service provided by the Bank.

#### 2.4.7.2. Standing Committee on Customer Service:

The Committee will be a dedicated focal point for customer service in our bank, which should evaluate the functioning in various departments. The Standing Committee will serve as the micro level executive committee driving the implementation process and providing relevant feedback while the Customer Service Committee of the Board would oversee and review / modify the initiatives. The composition and quorum of the Committee has been devised by MASD.

2.4.7.2.1 Evaluate feed-back on quality of customer service received from various quarters. The committee would also review comments/feed-back on customer service and implementation of Code of Bank's Commitments to Customers received from BCSBI.

2.4.7.2.2 The Committee would be responsible to ensure that all regulatory instructions regarding customer service are followed by the bank. Towards this, the committee would obtain necessary feed-back from Regional Managers/ Divisional heads.

2.4.7.2.3 The committee would also consider unresolved complaints/grievances referred to it by Regional Managers/Divisional heads responsible for redressal and offer their advice.

2.4.7.2.4 The committee would submit report on its performance to the Customer Service Committee of the Board at quarterly interval.

#### 2.4.8. Chairman / Board Members

A number of grievances are addressed by customer directly to the Chairman / Board Members / General Manager. Where the issues raised are considered serious, the Chairman / Board Members / General Manager may call for a report on the causes that led to the grievance, action taken and final resolution given to the customer.

# 2.4.8.1. Nodal Officer and other designated officials to handle complaints and grievances:

Nodal Officer: Divisional Head, Complaints and Concurrent Audit will be ex-officio Principal Nodal Officer at Head Office level who will be responsible for the implementation and monitoring of grievances redressal for customers in the bank. Aggrieved customers can write directly to the Principal Nodal Officer regarding their grievances at the following address :

The Principal Nodal Officer, (Complaints & Concurrent Audit Division) Sarva Haryana Gramin Bank Plot No. 1, SHGB House, Sector – 3, Rohtak Email: shgbcomplaints@shgb.co.in

Likewise, at Regional Offices, the RMs will be Nodal Officer and shall nominate persons (not below the rank of Sr. Manager) as CCEOs, who shall be responsible for the implementation and monitoring of Grievance Redressal of Customers for the offices under their administrative control.

Grievance Redressal Cell, under a reasonably senior and experienced officer, duly supported dedicated staff, be set up at Regional Offices to handle complaints of customers in a satisfactory manner. The names, addresses, e-mail and contact numbers of CCEOs shall be made available at the branches.

#### 3. <u>Root Cause Analysis(RCA)</u>

The Bank shall undertake Root Cause Analysis (RCA) of Customer Grievances to identify the underlying causes and thereby take necessary corrective measures to bring process/systemic improvement, with the objective to minimize the recurrence of Grievances of similar nature. The detailed guidelines for this have been outlined in the Operational Guidelines (Annexure).

#### Mandatory display requirements

It is mandatory for the Bank to provide:

- a. Appropriate arrangement for receiving complaints and suggestions.
- b. The name, address and contact number of Principal Nodal Officer(s)/ Regional Heads / Nodal Officer(s) /CCEOs.
- c. Contact details of Banking Ombudsman of the area.
- d. Code of Bank's commitments to customers/Fair Practice code.
- e. Display of CNB (Comprehensive Notice Board) in Branches.
- f. Magnifying Glass for visually impaired persons.

#### 3.1 Interaction with customers

The Bank recognizes that customers' expectations/requirements/ grievances can be better responded through personal interaction with customers by Bank staff. Many of the complaints arise on account of lack of awareness among customers about Bank's services and such interactions will help the customers appreciate banking services better. In view of this, following arrangements have been made:

#### 3.2 Customer Service Committees

Customer Service Committees shall be set up in all Regional offices /Branches to look into the quality of customer service rendered and critically examine the feedback/suggestions for improvement in customer service. These committees shall I&A Division Circular NO. 38/2024 Grievance Redressal Policy 2024-25

meet once in a month where staff and invited customers shall interact freely on service-related issues.

Two nominated non-official members are to be invited in the Regional Office Level Customer Service Committee Meeting on quarterly basis and 'theme of the quarter' will be deliberated upon during these meetings. The theme will be decided at Complaints and Concurrent Audit Division, Head Office and conveyed well in advance to the field functionaries.

A pensioner or in the absence of a pensioner, a senior citizen should invariably be included in the Customer Service Committee by the Branches and Regional Offices.

#### 3.3 Customer Relation Programmes

Customer Relation Programmes are to be conducted twice a year at Regional Office level, wherein customers from different segments are to be invited and their grievances / suggestions are to be looked into.

#### 3.4 Customers' Day:

Customers' Day is extended at the organisation structure level and be conducted on 15<sup>th</sup> of every month or next working Day if 15<sup>th</sup> is a holiday. Office bearers at respective locations will meet customers and take necessary action for resolution of genuine customer grievance between 3.00 PM to 5.00 PM as per following table:-

SN	Level	Office Bearer *
1	Branch	Branch Head
2	Regional Office	Regional Manager
3	Head Office	Principal Nodal Officer (PNO)

\*In case BH / RM / PNO are away from office due to official work / leave, then second person of the respective office will attend the customer.

#### 3.5 **Authority for Operational Guidelines**

The authority for Operational Guidelines shall lie with the Standing Committee on Customer Service.

#### 4. Disclosure of the Policy:

The complete policy document shall be placed on Bank's Intranet for access to all the concerned staff members and only Part 1 – Policy Document (except operational guidelines) shall be placed at the Bank's Website for access to Public.

#### 4.1 **Ownership of the Policy:**

The ownership of the Policy in terms of its review/modification/approval shall lie with HO: Complaints and Concurrent Audit Division. However, the implementation of various aspects of the Policy shall lie with the concerned Owner Division of the Product/Service/Process.

#### 4.2 Validity and Review of the Policy:

The policy will be effective from 01.04.2024 and valid up to 31.03.2025. The policy shall be subject to annual review.

Further, Standing Committee on Customer Service headed by the Chairman shall be authorised to:

a. Incorporate any changes necessitated in the policy for the interim period up to the next review, due to regulatory pronouncements made during the validity period of the policy; and

b. Extend validity of both the Policy (Part-I) and Operational Guidelines (Annexure) for a period up to three (3) months, however such extension of validity of the Policy (Part-I) shall be subject to ratification by the Board.

#### 4.3 Reporting:

The reporting of various aspects of the Policy shall be done as per the Statutory/Regulatory guidelines/requirements.

#### 4.4 Relaxation/Deviations/Exclusions: NIL

\*\*\*\*\*\*

#### 1. POLICY REFERENCE:

The Operational Guidelines in terms of the Grievance Redressal Policy, which is based on the guiding principles enlisted in the RBI "Master Circular on Customer Service in Banks" circulated vide RBI/2013-14/589 RPCD.CO.RRB.BC.No.100 / 03.05.33/2013-14 dated May 12, 2014, have been issued with the view to streamline the Bank's Internal Grievance Redressal Mechanism.

#### 2. GUIDELINES DETAILS:

#### 2.1. Lodging of Grievances:

The Customer has the right to Grievance Redressal and Bank has made adequate Arrangements for receiving Grievances and Suggestions, details of which are as under:

2.1.1. Complaints in Person:

Customers may primarily approach the Hall In-charge / Branch Manager in case of any grievance. Customer may also use Grievance cum suggestion box kept at branch for any feedback/ suggestions for improvement in our products and services.

2.1.2. Principal Nodal Officer:

Customers can also send complaints to the Principal Nodal Officer at the following address:-

The Principal Nodal Officer, (Complaints & Concurrent Audit Division) Sarva Haryana Gramin Bank Plot No. 1, SHGB House, Sector – 3, Rohtak Email: shgbcomplaints@shgb.co.in

The contact details of Principal Nodal Officer (PNO) is to be made available at all branches of the Bank on the Comprehensive Notice Board.

2.1.3. Grievances through Post/ e-mail:

Customer can submit Grievance by post or through e-mail on 'shgbcomplaints @shgb.co.in'. Complaints received by e-mail shall be acknowledged by e-mail. Contact Number and E-mail address of the Principal Nodal Officer is provided at the Branches and on Bank's website www.shgb.co.in.

2.1.4. Social Media:

All feedbacks (positive as well as negative) received on social media platforms like Facebook, Twitter, LinkedIn, Instagram, YouTube, etc., are accessed and dealt by IT/MASD Division, HO. The information/data is analysed and put up to the Standing Committee on Customer Service and Customer Service Committee of Board along with other information periodically.

#### 2.2. Resolution of Grievances:

Upon receipt of Grievance from any of the Sources, the Bank shall endeavour to provide quick and proper resolution. HO: Complaints and Concurrent Audit Division (CCA), being the nodal office for receipt of Grievances, will accept the Grievances and provide acknowledgement.

Further, based upon the nature and area of Grievance, the Grievances are marked to various Branches/Regional Offices/ HO Divisions.

#### 2.3. Process flow of resolution of Grievances:

To streamline the process of resolution of Grievances, the following Standard Operating Procedure (SOP) shall be followed:

2.3.1. The Grievances received from various sources are to be registered at Complaints and Concurrent Audit Division. The Grievances received from other sources such as CPGRAM, INGRAM, Post/Email, Physical Letters at Branch, VIPs, GM/Chairman/Board Members, etc., are to be registered, immediately upon its receipt.

2.3.2. An acknowledgement shall be sent to the Complainant by the concerned office within three working days of its receipt, duly informing him/her about the prescribed/expected TAT and Bank's Grievance Redressal Matrix.

2.3.4. Based upon the nature/area of Grievance, the Grievances are marked to the concerned RO/HO Division, it shall then be the responsibility of the concerned Office to provide the resolution within the prescribed Turnaround Time (TAT). In cases, wherein the resolution of Grievances is expected to take a longer time, the same shall be intimated to the Complainant, before the expiry of prescribed TAT for that category of Grievance.

2.3.5. The Grievance will then be taken up by HO CCA for resolution of all Customer Grievances of the specified ROs, in co-ordination with the concerned stakeholders at BOs/ROs/HO Divisions.

2.3.6. The Authority to mark closure/rejection of Grievance received at HO shall lie only at the HO level. The Branches/ROs shall provide remarks and recommend Grievances for closure to HO. Complaints received at Regional Offices/Branches can be closed by respective offices.

2.3.7. The Complainant shall be informed about the details of resolution/response provided, immediately upon marking closure of the Grievance.

2.3.8. The Grievances, wherein misbehaviour by the Staff member has been alleged, shall be dealt strictly with Zero-Tolerance. Such Grievances shall be addressed strictly in conformity with the laid-out SOP for dealing with cases of Misbehaviour with Customer by Bank Staff.

2.3.9. In compliance of the regulatory guidelines and Bank's Grievance Redressal Policy, the Bank will ensure that the final decision is conveyed to the complainant within a period of 30 days, from the receipt of complaint.

2.3.10. With the objective to minimise the escalation of Grievances to the level of RBI Ombudsman:

2.3.10.1. Every Grievances must mandatorily be registered by CCA so that it is addressed by the Bank's Internal Grievance Redressal (IGR) Mechanism.

2.3.10.2. Respective controllers are expected to ensure that meaningful reply is given to customer and compensation / refund is paid to him as per the provisions of the Compensation Policy in genuine cases without any delay.

2.3.11. Further, to handle the Complaints escalated to the RBI Ombudsman, a detailed SOP for handling of RBI Complaints is placed at **Annexure A**.

2.3.12. Further, preliminary Root Cause Analysis (RCA) of all the complaints will be conducted and shared with concerned HO Divisions on a Monthly basis. The concerned owner Division, shall then undertake a detailed RCA to remove the underlying deficiencies. The progress of the same shall be monitored at the Quarterly Meetings of the Committee constituted for conducting RCA.

2.3.13. Also, the Regional Offices will examine all the Customer Grievances on regular basis, to identify the underlying deficiency (human or system error) and take corrective measures immediately to stop its recurrence and ROs shall keep a record of the issues raised to regularly monitor its progress. Where the deficiency is system based, the issue shall be taken up with concerned HO Division under intimation to HO: CCA.

#### 2.4. Turnaround Time (TAT):

The Turnaround Time (TAT) for various categories of Grievances are governed as per the Statutory/Regulatory guidelines of RBI, NPCI, Payment Processors, etc. The Broad classification of Turnaround Time for various categories is as under:

2.4.1. Non-Digital Grievances:

In general, the TAT is 15 working days. However, in cases where the Grievance is marked for detailed investigation/review, the TAT shall be 30 days.

2.4.2. The cases of alleged unauthorized Electronic Debits:

The TAT shall be governed by the guidelines issued by HO, DBD, from time-to-time. The maximum TAT under this category is 90 days.

2.4.3. Grievances related to various transactions initiated through Alternate Delivery Channels:

The TAT under this category varies from 1 to 52 days, based upon the nature and transaction-initiated platform/method.

2.4.4. The field functionaries should endeavour to provide resolution of Grievances received from Top Management Officials within 3-5 working days from the date of receipt of Grievance and for Grievances related to Staff Misbehaviour with Customers, within 3 working days for cases, which can be resolved at the Frontline Stage.

#### 2.5. Root Cause Analysis of Customer Grievances:

Root cause Analysis is an important function that the Bank must undertake to remove the underlying causes of repetitive nature of Grievances to minimize instances of Customer Grievances. This review mechanism will help the Bank in identifying underlying deficiencies (in product features, services or technology) and taking necessary corrective measures to address.

Quarterly meeting of Divisional Heads of ITD, DBTD and CCA and other concerned HO Divisions to be held regularly. HO: MASD will be the co-ordinator of the meeting. Minutes to be prepared and forwarded to respective Divisional Heads to bring the necessary improvements in the areas of concern, so that recurrence of complaints of similar nature are minimised.

#### 2.6. Sensitizing operating staff for improvement in service & handling complaints:

2.6.1. Complaints often occur due to lack of knowledge and awareness of the products and services. The Nodal Officers/ CCEOs are required to give feedback on training needs of staff at various levels to Training Division, Head office so that they may arrange one / two sessions on Customer Service in the training programmes conducted regularly to evaluate measures for redressing Customer Grievances promptly.

2.6.2. To deal with customers with a positive attitude and in a customer friendly manner, the selection of front-line staff should be done carefully. With an open mind and a smile on the face, staff should be able to win the customer's confidence. Imparting soft skills required for handling irate customers should be an integral part of the training programmes. It would be the responsibility of the Nodal Officer/ CCEOs to ensure that the internal machinery for handling complaints/grievances operates smoothly and efficiently at all levels.

2.6.3. To ascertain reasons for customer complaints, surprise visits be carried out in branches and suitable necessary action be taken against the employees who are found to be denying services during the course of surprise visit.

#### 3. VALIDITY AND REVIEW OF THE POLICY:

The policy will be effective from 01.04.2024 and valid up to 31.03.2025. The policy shall be subject to annual review.

Further, Standing Committee on Customer Service headed by the Chairman shall be authorised to:

a. Incorporate any changes necessitated in the policy for the interim period up to the next review, due to regulatory pronouncements made during the validity period of the policy; and

b. Extend validity of both the Policy (Part-I) and Operational Guidelines (Part-II) for a period up to three (3) months, however such extension of validity of the Policy (Part-I) shall be subject to ratification by the Board.

#### STANDARD OPERATING PROCEDURE (SOP) FOR DEALING BANKING OMBUDSMAN COMPLAINTS

1. RBI is dealing BO complaints through its CMS Portal. The Nodal Officer shall download complaints from CMS Portal on the same day of receipt of complaint from RBI.

2. The Nodal Officer shall examine whether the complaint is maintainable or nonmaintainable as per the provisions of RB-IOS 2021. If the complaint is non-maintainable, Nodal Officer shall return the complaint to Banking Ombudsman stating the specific clause of RBI-IOS 2021, in CMS Portal on the same day. If the complaint does not pertain to our Bank, the complaint is to be returned to RBI with specific comments in CMS Portal on the same day.

3. The Nodal Officer shall analyse the issue raised by the complainant and check whether the complaint was earlier received by the Bank and was registered.

4. The Nodal Officer shall register all Banking Ombudsman complaints as per the extant instructions.

5. Nodal Officer will forward the complaint to the concerned RO / HO Division for examination of case & submission of information to him.

6. After examination of the case, if there is visible deficiency on the part of the Bank, payment should be made as per the Compensation Policy of the Bank issued by HO: I&AD without waiting for any Advisory from Banking Ombudsman and suitable reply should be submitted in RBI CMS Portal.

7. The Nodal Officer will ensure to submit the required information to the Banking Ombudsman within the stipulated time.

8. If it is established that there is no deficiency on the part of the Bank, suitable reply/ representation should be sent to RBI through CMS Portal within the specific timeline provided by RBI.

9. It is important to note that the Nodal Officer is responsible for submission of timely (as per Integrated Ombudsman Scheme 2021) and comprehensive reply to all Banking Ombudsman complaints received from different Banking Ombudsman. He / she will be the Single Point of Contact for Head Office for the matters related to Banking Ombudsman complaints. In case any penal action is taken/ Award is issued by Banking Ombudsman due to non-submission of reply within TAT, the concerned Nodal Officer shall be held responsible and staff side action shall be initiated against him.

10. In case the complaint is pending beyond 10 days, the list of such complaints should be reported to Principal Nodal Officer, who should ensure that no complaint shall remain outstanding for more than 15 days for submission of reply in RBI CMS portal.

11. In order to reduce the complaints received at Office of Ombudsman against the Bank, Regional Offices to invariably do a Root Cause Analysis of Banking Ombudsman complaints pertaining to their Regional Office, the same should be submitted to and complied at Head Office on monthly basis for onward submission to HO: CCC.

12. In case it is established that Fraud has occurred in a particular complaint FMR should be filed invariably as per the extant guidelines issued by I&AD, Head Office.

13. Nodal Officer should update the status of BO complaints in CGRMS Portal as per the communication received from RBI through CMS Portal/ e-mail received from RBI.

14. In case any Advisory is issued by Office of Banking Ombudsman (OBO), RBI, representation shall be made by the Nodal Officer within stipulated timeline as specified by Banking Ombudsman if the Nodal Officer is of the view that there is no deficiency on part of the Bank in the instant matter.

15. If Nodal Officer observes that there is a deficiency on the part of the Bank, payment of Advisory issued be made as per extant guidelines.

16. The Nodal Officer will conduct the Root Cause Analysis of penalty imposed by OBO, RBI on account of Advisory and place the same before Principal Nodal Officer. If there is a system error, the matter should be reported to HO IT for rectification/escalation of the issue with PNB for necessary action in order to avoid recurrence of such incidents and in case there is a human error, Staff Accountability must be initiated by the concerned RO as per extant guidelines of the Bank.

17. It is to be noted that many a times OBO, RBI, provides a specific timeline while raising a query in the CMS Portal. (For example- *information is to be submitted by EOD/ information to be submitted by a particular date*). In these cases Nodal Officer is to strictly adhere to the timeline provided by RBI and in case any penal action / Award is issued by OBO, RBI, the Nodal officer will be held responsible.

18. BO cases would normally have been dealt with earlier according to our internal grievance redressal mechanism. Cases where the claim is rejected fully or partially are required to be escalated to the IO seeking their views before conveying bank's decision to the complainant. However, if such cases were not escalated to the IO previously, the jurisdictional RO must ascertain the reason behind this and ensure corrective measures.

19. Customers may approach the Banking Ombudsman if they feel that there is deficiency in service in any of the services provided by the Bank. Branches / Operating units / Complaint dealing departments at Regional Offices are advised to redress the grievances based on the guidelines / SOPs issued on specific services / products by respective Owner Divisions from time to time before sending the reply to the Banking Ombudsman. Even after taking steps for reconciliation / observing steps when no deficiency is seen on the Bank's part, if an advisory is received, the Bank to review the case, based on the various SOPs issued by the Bank.

#### Cases where Award has been issued by OBO, RBI.

As per Reserve Bank- Integrated Ombudsman Scheme (RBIOS), 2021, the RBI Ombudsman shall pass an Award in the event of:

(a) Non-furnishing of documents/information as enumerated in clause 14(4). The clause 14(4) of RBIOS, 2021 states that in case of non-submission of reply by the Bank in RBI Ombudsman complaints within 15 days of receipt of complaint from RBI, an exparte Award may be passed by RBI, which shall be non-appealable by the Bank; or

(b) The matter not getting resolved under clause 14(9) based on records placed and after affording a reasonable opportunity of being heard to both the parties. A copy of the Award shall be sent to the complainant and the Regulated Entity. The Award passed by the RBI Ombudsman shall lapse and be of no effect unless the complainant furnishes a letter of acceptance of the Award in full and final settlement of the claim to the Bank, within a period of 30 days from the date of receipt of the copy of the Award. Provided that no such acceptance may be furnished by the complainant if he has filed an appeal under sub-clause (3) of clause 17 of Integrated Ombudsman Scheme, 2021. The Bank shall comply with the Award and intimate compliance to the Ombudsman within 30 days from the date of receipt of the letter of acceptance from the complainant, unless it has preferred an appeal under sub-clause (2) of clause 17.

# Standard Operating Procedure (SOP) for handling Award cases as per Reserve Bank – Integrated Ombudsman Scheme, 2021 is given as under:

1. In case, the Nodal Officer considers that there is no deficiency on part of the Bank in the matter where Award has been passed by the RBI Ombudsman, ground for filing an Appeal along with justification and relevant documents should placed before the Chairman for getting approval for filling an Appeal before the Appellate Authority, RBI.

2. In case, the Regional Office/Nodal Officer considers that there is deficiency on part of the Bank in the matter where Award has been passed by the RBI Ombudsman, the Award should be complied with by the Regional Office in terms of RBI Ombudsman directions. Payment of Award should be made to the complainant as per I&A Division Circular No. 19/2023 dated 31.03.2023 within 30 days from the date of receipt of the letter of acceptance from the complainant.

#### Appeal by Customer against the decision of Banking Ombudsman in favour of Bank

The complainant may, aggrieved by an Award under clause 15(1) of RBI IOS 2021 or rejection of a complaint under clauses 16(2)(c) to 16(2)(f) of RBI IOS 2021, within 30 days of the date of receipt of the Award or rejection of the complaint, prefer an appeal before the Appellate Authority.

Provided that the Appellate Authority may, if he is satisfied that the complainant had ufficient cause for not making the appeal within the time, may allow a further period not exceeding 30 days.

The Bank's versions will be submitted to Reserve Bank of India by HO: CCA after getting detailed reply from the concerned Regional Manager. Nodal Officer shall submit the reply to original grievance and further queries made by RBI within stipulated time.

# The Appellate Authority may, after giving the parties a reasonable opportunity of being heard, take any of the following decision:

- (a) dismiss the appeal,
- (b) allow the appeal and set aside the Award or order of the Ombudsman,
- (c) remand the matter to the Ombudsman for fresh disposal in accordance with such directions as the Appellate Authority may consider necessary or proper,
- (d) modify the order of the Ombudsman or Award and pass such directions as may be
- necessary to give effect to the order of the Ombudsman or Award so modified.
- (e) pass any other order as it may deem fit.

The order of the Appellate Authority shall have the same effect as the Award passed by Ombudsman under clause 15 of RBI IOS or the order rejecting the complaint under clause 16 of RBI IOS 2021, as the case may be.

#### FREQUENTLY ASKED QUESTIONS

# 1. Who will pay the advisory / award issued by the BO in case the complaint Pertains to multiple Region and advisory / award was issued due to non- submission of document / information by the Bank?

**Reply :** In such cases, the advisory / award issued by BO shall be paid by the Region (current owner), which is actually dealing with the complaint, within the timeline as mentioned under RBI IOS 2021.

## 2. What action is required if a BO complaint pertaining to another Regulated Entity is received?

**Reply :** If the complaint does not pertain to our bank, the complaint is to be returned to RBI with specific comments in CMS Portal on the same day.

## 3. What action is required if a BO complaint is assigned to a Nodal Officer in RBI CMS after long delay?

**Reply**: It has been observed that in several cases the BO complaints are entered in RBI CMS Portal, but it is assigned to a Nodal Officer of our Bank with long delay. In such cases, TAT starts even before allotment of the BO complaint to a Nodal Officer and notice under clause 13 (1) / advisory is issued by Banking Ombudsman. It is advised to take up the matter with the concerned Banking Ombudsman promptly with a request to permit 15 days' time to submit the response as per the provisions of RBI IOS 2021. If extension in time limit is not permitted, such cases to be responded on priority within available TAT.

#### 4. Whom to contact for technical issues in RBI CMS Portal?

**Reply:** Nodal Officer should immediately inform the concerned Banking Ombudsman for the error and request for early resolution of the issue to enable the Nodal Officer to submit responses in eligible cases. The Nodal Officer should also escalate the matter to Reserve Bank of India, CEPD Mumbai on their email Id "cmstestbodo@rbi.org.in" and follow up the matter with RBI.

# 5. What action is required if Notice under 13(1) is issued in a particular BO complaint?

**Reply :** The Nodal Officer will always strive to submit the complete and comprehensive reply to the Banking Ombudsman within TAT of 15 days' time to avoid issue of notice under Clause 13 (1) of RBI IOS 2021. However, in the event of issue of Notice under Clause 13 (1) of IOS 2021, the Nodal Officer will ensure to submit the reply immediately / within stipulated timeline.

#### 6. Who is responsible for resolving the BO complaints?

**Reply :** Nodal Officer (Chief Manager, CCA) at Head Office is primarily responsible for resolution of the BO complaints assigned to the Nodal Officer. Chief Manager CCA will co-ordinate with the concerned stake holders to submit final and comprehensive reply to the Banking Ombudsman.

#### 7. What action is required if an Advisory / Award is issued in particular BO complaint?

**Reply :** The Nodal Officer will always strive to submit the complete and comprehensive reply to the Banking Ombudsman within TAT of 15 days' time to avoid issue of Advisory / Award / Notice under Clause 13 (1) of RBI IOS 2021.

However, in the event of issue of advisory by BO, Nodal Officer has the option to either represent the case, if there are valid and sufficient reasons or comply the advisory. Also, in case of issue of Award by BO, Nodal Officer has option to either file an appeal as per the provisions of RBI IOS 2021 or comply the Award within timeline as stipulated in the IOS 2021.