

1. Introduction

In this era of competitive banking, excellence in customer service is the key differentiator deciding the customer preference and acts as a tool in the hands of bank for spurring sustained business growth. Customer complaints are part of any corporate's business life, especially if it is part of a service industry like banking. As a service organization, superior customer service and customer satisfaction is of paramount importance to any Bank. Bank should be aiming at customer delight by keeping its staff in listen mode to understand the customers' requirements vis-a-vis the products, services, process and procedures, facilities offered and strive to bridge the gap by staying in mission mode to implement new initiatives to provide simple procedures and hassle free products / services. Prompt and efficient service is essential for not only attracting new customers, but also to retain existing ones.

1.1 Aim/ Objective

This policy document aims at providing redressal machinery and a review mechanism to keep the redressal machinery robust and sensitive and ensure prompt redress of customer complaints / grievances, trying to minimize recurrence thereby raising the level of service delivery. The review mechanism will not only help in identifying shortcomings in product features and service delivery, but will also help in reducing customer dissatisfaction and help in building of the name and image of the Bank. The bank's policy on grievance Redressal follows the under noted principles:

- Customers be treated fairly at all times
- Complaints raised by customers will be dealt with courtesy and on time
- Bank will treat all complaints efficiently and fairly as it involves reputational risk and potential loss of business.
- The bank employees will work in good faith and without prejudice to the interests of the customer.
- Customers will be fully informed of avenues to escalate their complaints/ grievances within the organisation and their rights to alternative remedy, if they are not fully satisfied with the response of the bank to their complaints.

1.2 Frame Work

In order to make the bank's Redress Mechanism more meaningful and effective, a structured system needs to be built up towards such end. Such system would ensure that the Redressal sought is just and fair and is permissible within the given framework of rules and regulations. The policy document would be made available at all branches. The concerned employees should be made aware about the Complaint handling process.

1.3 The customer complaints arise due to:

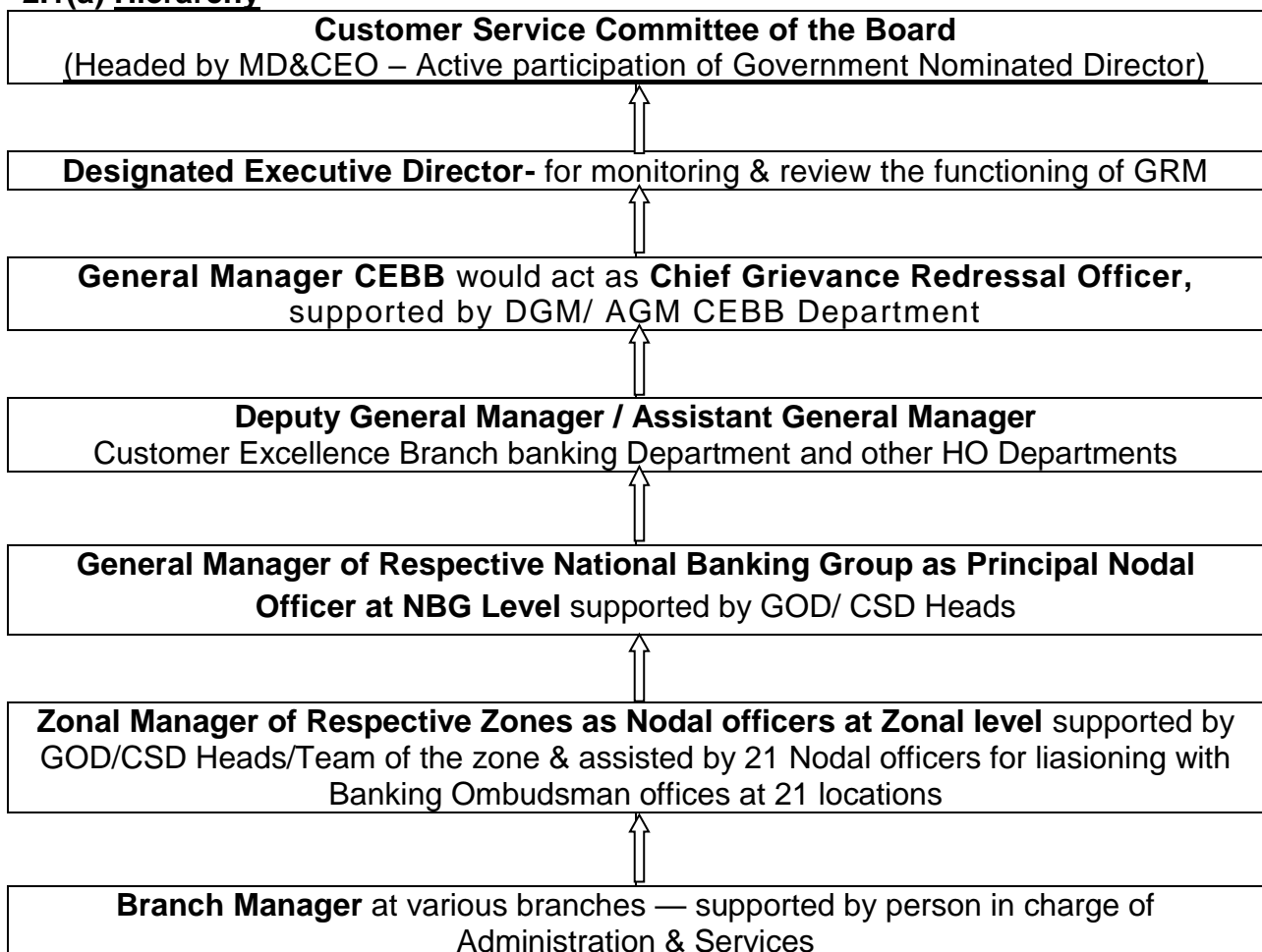
- a. The attitudinal aspects in dealing with customers / mutual misunderstandings
- b. Inadequacy of the functions/ arrangements made available to the customers or gaps in standards of services expected and actual services rendered.

Customer has a right to register his/her complaint, if he/ she is not satisfied with the services provided by the bank. He/ She can give his/ her complaint in the form of a letter written by him/ her or any of his/ her representative, communicated orally or over telephone, by filling a web form, available at website & by sending e-mail etc.

2.1 Internal Machinery to handle Customer complaints/ grievances

The Bank will have public grievance machinery functioning at four levels i.e. Branch, Zone, National Banking Group and Head Office level for general banking branches and a two level system for Large Corporate Branches. All complaints received at every level will be acknowledged immediately (as per provision in OCRM module but not exceeding 3 working days), redressed and final reply will be given to the complainants. All the complaints against general banking branches will comprehensively be dealt with and resolved at Zonal Office level, in case the branches are unable to address the issue in its entirety at their end. In case of Large Corporate Branches, Head Office will redress the grievances, if these branches are not able to resolve the issues at their level.

2.1(a) Hierarchy



2.2 Chief Grievance Redressal Officer and other designated officials to handle complaints and grievances

Bank has a Chief Grievance Redressal Officer (CGRO)/ Nodal Officer of the rank of General Manager, who is responsible for the implementation of all mandatory/

regulatory requirements/ initiatives/ adherence to core requirements with regard to customer service and complaint handling for the entire bank. The bank may also appoint General Manager (NBG) and Zonal Managers at all NBGs/ Zonal Offices to handle customer grievances in respect of branches functioning under their control. The name and contact details of nodal officer(s) will be displayed on branch notice boards/ Bank's website.

The responsibilities of the Chief Grievance Redressal Officer at Head Office shall include:

- ❖ Laying down the grievance redressal policy and process, monitoring its implementation and initiating corrective action in consultation with other respective departments wherever needed.
- ❖ Review and approval of all products and processes from the customer service perspective in collaboration with other functional heads.
- ❖ Conduct of Customer Service surveys to understand customers' perception of Bank's service and to identify priority areas for improvement of customer service, to learn more about hidden complaints as approved by the Standing Committee on Customer Service and initiate corrective action wherever necessary.
- ❖ Review the comments of auditors on implementation of Customer Service and grievance redressal policies and initiate corrective action wherever necessary. Collect, analyse and present data to enable the Standing Committee on Customer service and Customer Service Committee of the Board to understand the customer service issues that need to be addressed and also recommend actions to be initiated.
- ❖ With the help of data collected from feedback, complaints, customer service surveys and audits, do root cause analysis of issues with most impact and / or those which constantly recur, to identify the processes that need to be corrected to prevent recurrence. The Quality Cell at Head Office shall undertake Root Cause Analysis and suggest process improvements.
- ❖ Suggest implementation of capacity building initiatives, in collaboration with other functional heads and the training establishments, to enable the front office and back office staff to deliver quality customer service.
- ❖ Convene meeting of the Standing Committee on Customer Service and Customer Service Committee of the Board and to implement their directions in a time bound manner.
- ❖ Ensure prompt submission of all reports and returns to RBI and other statutory / regulatory bodies relating to Customer Service
- ❖ Take all other actions and initiatives necessary to improve the quality of Customer Service, on a continuous basis, including implementation of upgrade web-based Operational Customer Relationship Management (OCRM) as envisaged by ministry of Finance, Department of Financial services.
- ❖ The Nodal officer, besides his above mentioned duties, shall also decide upon matters requiring immediate action and follow-up for timely redressal of grievances

of customers. Where delay is seen, he shall take corrective steps/action to avoid delays, including action against staff where shortcomings are seen.

2.3 Customer Service Committee of the Board

This committee of the Board will comprise of the following members:

- A) The Managing Director & Chief Executive Officer
- B) Executive Directors; and
- C) Any four Non-Executive Directors

The quorum for the meeting is 3 with minimum one Non-Executive Director. The Committee will include Internal Ombudsman, Customer expert and 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 banks.

This committee would be responsible for formulation of a Comprehensive Deposit Policy incorporating the issues such as the treatment of death of a depositor for operations of his account, the product approval process and annual survey of depositor satisfaction and triennial audit of such services. The Committee would also examine any other issues having a bearing on the quality of customer service rendered. This Committee would also review the functioning of Standing Committee on Customer Service.

2.4 Standing Committee on Customer Service

The Bank has permanent Standing Committee on customer service which will serve as a dedicated focal point for customer service having sufficient powers to evaluate the functioning in various departments. The Standing Committee may be chaired by the CMD or the Designated Executive Director and include GMs of following department as permanent members:

CEBB and Resources, Information Technology, Digital Banking, Management Information System, General Operations Department, Retail Banking, Business Process & Re-engineering & Small & Medium Enterprises. The GMs of other departments may be called in the meeting of Standing Committee, if the agenda items discussed by the Committee pertain to their department. Internal Ombudsman will be permanent invitee in the meeting

The functions of the Standing Committee will be as follows:

- ❖ The Standing Committee is entrusted with the task of ensuring timely and effective compliance of the RBI instructions on customer service. The Committee will receive the necessary feedback from various functional departments of the Bank and will monitor implementation of RBI instructions on Customer Service.
- ❖ The Standing Committee may review the practice and procedures prevalent in the Bank and take necessary corrective action, on an ongoing basis as the intent is translated into action only through procedures and practices.
- ❖ A brief report on the performance of the Standing Committee during its tenure indicating, inter alia, the areas reviewed, procedures/ practices identified and

simplified / introduced may be submitted periodically to the Customer Service Committee of the Board.

- ❖ The committee would also consider unresolved complaints / grievances referred to it by functional heads responsible for redressal and offer their advice.

2.5 Internal Ombudsman –

An independent authority of the rank of General Manager has been appointed as an additional layer of grievance redressal to act in the same manner as existing RBI appointed Banking Ombudsman. All complaints which have been Partly or Wholly Rejected at any stage of internal grievance redressal mechanism of the bank must be escalated to the Internal Ombudsman of the bank within two weeks from the date of receipt of complaint. The time frame for IO to give a decision is 15 days from the date of rejection of complaint. In no case, the complainant should be advised to approach the Internal Ombudsman directly. Bank should not keep contact details of Internal Ombudsman in public domain.

The communication to the complainant where the complaint has been Partly or Wholly Rejected, **must invariably contain a statement that** “the complaint has been examined by the Bank's Internal Ombudsman”. In case of disagreement with the Internal Ombudsman's decision, the Bank may obtain approval of the Executive Director in charge of customer service and the reply forwarded to the complainant shall mention that “the decision of the Bank has the approval of the Executive Director”. All such cases shall be subsequently reviewed by the Customer Service Committee of the Bank's board.

2.6 RBI Notification regarding Strengthening Grievance Redressal Mechanism:

With a view to enhance the efficacy of the Grievance Redressal Mechanism in banks, RBI vide its communication Ref. No. CEPD.CO.PRD.Cir.No.01/13.01.013/ 2020-21 dated 27.01.2021 has decided to put in place a comprehensive framework comprising inter-alia:

- a) Enhanced disclosure on customer complaints in the Annual Report of the Bank as per Annexure I kept alongside;
- b) recovery of cost of redress from banks for the maintainable complaints received against them in OBOs in excess of the peer group average; and
- c) Undertaking intensive review of grievance redressal mechanism and supervisory action against regulated entities failing to improve their redressal mechanisms in a time bound manner.

The bank will constantly analyze the root causes of the complaints and take necessary corrective measures so as to minimise the number of complaints. The suggestions emanating from various Branch Level Customer Service Committee Meetings will be deliberated in Head Office in the Standing Committee on Customer Service to enhance the customer satisfaction.

Customers can refer their complaints to Banking Ombudsman of RBI if they do not get satisfactory resolution from the Bank within 30 days of lodging the complaint with the Bank by any mode. Therefore, the Bank will endeavour to resolve all the complaints within 30 days (including the time required for reference, if any, to Internal Ombudsman). This will ensure that minimum complaints are pending above 30 days which needs to be disclosed in the Annual Report. So also, the references to Banking Ombudsman will be minimum.

This will ensure that our performance for the grievance redressal is better than the peer group average. If any complaints are referred to BO, the Bank will ensure to resolve the complaints within the stipulated time so as to avoid any Advisory/ Award.

3. Mandatory display requirements of Grievance Redressal Machinery

It is mandatory for the bank to provide:

- ❖ Appropriate arrangements for receiving complaints and suggestions
- ❖ The name, address and contact number of Nodal Officer(s)
- ❖ Contact details of Banking Ombudsman of the area
- ❖ Code of bank's commitments to customers / Fair Practice Code

4. Resolution of Grievances

Branch Manager is responsible for the resolution of complaints / grievances in respect of customer service by the branch. He would be responsible for ensuring closure of all complaints received at the branches. It is his foremost duty to see that the complaint is resolved completely to customer's satisfaction and if the customer is not satisfied, then he should be provided with alternate avenues to escalate the issue. If the branch manager feels that it is not possible at his level to solve the problem he can refer the case to Zonal Office for guidance. Similarly, if Zonal office finds that they are not able to solve the problem either, such cases may be referred to the Principal Nodal Officer/ GM NBG. If the NBG also is unable to resolve the complaint the same can be referred to respective Head Office Department. If the complaints are partly or wholly rejected at any level, the same have to be escalated to Internal Ombudsman.

Escalation Matrix available to customers is as under:

Level s	Escalatio n	Particulars
Level – 1	Branch Level	In case of any complaint, the matter may be first brought to the notice of concerned Branch Manager for immediate Redressal.
	Online Complai nt (OCRM)	Alternatively, customer may register complaint online on our Bank's website. Upon lodging the complaint in OCRM, the system provides a "Tracker ID" as an acknowledgement and also to track the progress of the complaint. Complainant has to preserve the "Tracker ID" for future reference.
Level – 2	Zonal Level	If the complaint is not redressed to the satisfaction of the customer, the matter may be taken up with the Zonal Manager concerned (by giving tracking number/ reference number) whose name, address and other details may be obtained by clicking the link below: https://www.bankofindia.co.in/pdf/Nodal_officers_for_GR_Code_compliance.pdf
Level – 3	NBG Level	If still any complaint is not redressed, the matter may be taken up with the next level i.e. NBG GM concerned (by giving tracking number/ reference number) whose name, address and other details may be obtained by clicking the link below: https://bankofindia.co.in/Home/NBGLocator
Level – 4	Chief Grievanc e Redress al Officer	If the complainant still feels unsatisfied with the responses received he/ she can address the complaint to the Bank's Nodal Officer at Head Office designated to deal with customers' complaints/ grievances giving full details of the case and giving tracking number/ reference number on the below mentioned address: The General Manager, Customer Excellence Branch Banking Department, Star House I, Plot: C-5, G-Block, 2nd floor, East Wing, Bandra-Kurla Complex, Bandra (East), Mumbai-400 051 Tel No. 022-66684860 e-mail: cgro.boi@bankofindia.co.in
External Agencies		Even after this, if he/ she is not satisfied, he/ she is free to take recourse with the Banking Ombudsman located in State Capitals under RBI Ombudsman Scheme 2006.

4.1 Time frame

Complaints have to be seen in the right perspective because they indirectly reveal weak spot in the working of the bank. Complaints received should be analysed from all possible angles. Specific time schedule has been set up for handling complaints and disposing them at all levels including branches, Zones, NBGs and respective head office Departments. The time frame as per Standard Operating Procedure (SOP) is as follows:

	No. of days to resolve
Branch Level	5 days
Zone Level	3 days
NBG Level	2 days
Head Office Level	4 days
Internal Ombudsman	15 days from the date of rejection of complaint

Branch Manager should try to resolve the complaints within the specified time frame, decided by the bank with automatic escalation as above. The partly or wholly rejected complaints at all levels should be escalated to the Internal Ombudsman within two weeks from the date of receipt of complaint. The time frame for Internal Ombudsman to examine the complaint and give the decision is 15 days.

Communication of bank's stand on any issue to the customer is a vital requirement. Complaints received which would require some time for examination of issues involved should invariably be acknowledged promptly.

Bank will endeavor to redress complaints within the TAT of 14 days. However, this TAT will be exempted for the complaints relating to failed/ disputed debit card/ credit card/ POS/ ATM, transactions, etc. as stipulated by the regulators.

Automatic Escalations will be provided for, in OCRM and time given to various levels would be as follows –

- Branch Level Resolution – 5 days of receipt of the complaint.
- If Branch is unable to resolve the complaint, it will be automatically escalated to the respective Zonal Office; time for Zonal Office for resolution of the complaint would be 3 days.
- If Zonal Office fails to resolve the complaint, it will be automatically escalated to the respective NBG, time for NBG for resolution of complaint would be 2 days.
- If NBG fails to resolve the complaint, it will be automatically escalated to the respective Head Office Department. The time frame for resolving the complaints for Head Office Departments is 4 days. Thus, the maximum period for handling the complaints is two weeks from the date of receipt of the complaint.
- As per the recent procedural guidelines received from RBI, the Banks are required to internally escalate all partly or wholly rejected complaints within two weeks of the receipt of the complaint to the Internal Ombudsman, before conveying the final decision to the complainant within a period of 30 days, from the receipt of complaint.

- Note: 1) Branch to ensure that minor complaints that could be resolved at the Branch Level itself are not escalated to the next level.
- 2) The complaints where resolution requires TAT of more than two weeks will be exempted from the above escalation matrix e.g. the complaints relating to failed/ disputed debit card/ credit card/ POS/ ATM, transactions, etc.

5. Interaction with customers

The bank recognizes that customers' expectations/ requirements/ grievances can be better appreciated through regular personal interaction with customers by bank's staff. Structured customer meets, say once in a month, will give a message to the customers that the bank cares for them and values their feedback / suggestions for improvement in customer service. Many of the complaints arise on account of lack of awareness among customers about bank services and such interactions will help the customers appreciate banking services better. As for the bank, the feedback from customers would be a valuable input for revising its products and services to meet customer requirements.

Bank will conduct Open House Meeting with customers on 10th of every month between 3 p.m. and 5 p.m. In case of holiday on this date, the meeting should be conducted on the following working day. In the said meeting all Branch Managers/ Zonal Managers/ General Manager-NBGs, General Managers of all the departments at Head Office/ Executive Directors/ MD & CEO should remain present to listen to the grievances of customers at their respective offices, and to take all necessary action for time-bound resolution of genuine grievances.

6. Sensitizing operating staff on handling complaints

Staff should be properly trained to improve customer service and minimise complaints. Further, all staff training programmes of duration exceeding 3 days, will have a session dedicated for sensitizing the staff and imparting soft skills required for handling irate customers. We are dealing with people and hence difference of opinion and areas of friction can arise. With an open mind and a smile on the face, we should be able to win the customers' confidence. Imparting soft skills required for handling irate/ agitated customers to be an integral part of the training programmes, schedules. It would be the responsibility of the Nodal Officer to ensure that internal machinery for handling complaints / grievances operates smoothly and efficiently at all levels. He should give feedback on training needs of staff at various levels to HR Department.

7. Bank's Computerized Customer Complaint System

Standardized Public Grievance Redressal System as suggested by the Ministry of finance-department of financial services has been operationalized. The same is also incorporated in the complaints module called OCRM.

8. Internal Audit of Customer Service to oversee and comment on the quality of resolution of Customer Complaints.

9. Periodicity of Review

Frequency of the review of the policy will be one year. However, the policy will be reviewed before the expiry date if there is any change in the guidelines issued by RBI/ IBA or the Bank during the operative period.

Enhanced disclosure on customer complaints**Summary information on complaints received by the bank
from customers and from the OBOs**

Sr. No	Particulars	Previous Year	Current Year
Complaints received by the bank from its customers			
1.	Number of complaints pending at beginning of the year		
2.	Number of complaints received during the year		
3.	Number of complaints disposed during the year		
3.1	Of which, number of complaints rejected by the bank		
4.	Number of complaints pending at the end of the year		
Maintainable complaints received by the bank from OBOs			
5.	Number of maintainable complaints received by the bank from OBOs		
5.1	Of 5, number of complaints resolved in favour of the bank by BOs		
5.2	Of 5, number of complaints resolved through conciliation/ mediation/ advisories issued by BOs		
5.3	Of 5, number of complaints resolved after passing of Awards by BOs against the bank		
6.	Number of Awards unimplemented within the stipulated time (other than those appealed)		

Note: Maintainable complaints refer to complaints on the grounds specifically mentioned in BO Scheme 2006 and covered within the ambit of the Scheme.

Top five grounds of complaints received by the bank from customers

Grounds of complaints, (i.e. complaints relating to)	Number of complaints pending at the beginning of the year	Number of complaints received during the year	% increase/ decrease in the number of complaints received over the previous year	Number of complaints pending at the end of the year	Of 5, number of complaints pending beyond 30 days
1	2	3	4	5	6
Current Year					
Ground 1					
Ground 2					
Ground 3					
Ground 4					
Ground 5					
Others					
Total					
Previous Year					
Ground 1					
Ground 2					
Ground 3					
Ground 4					
Ground 5					
Others					
Total					

A. Abbreviations

Abbreviation	Description
ATM	Automatic Teller Machine
BCSBI	Banking Codes & Standards Board of India
CEBB	Customer Excellence Branch Banking
CGRO	Chief Grievance Redressal Officer
CSD	Customer Service Department
GOD	General Operations Department
IO	Internal Ombudsman
NBG	National Banking Group
OBO	Office of the Banking Ombudsman
OCRM	Operational Customer Relationship Management
POS	Point of Sale
RBI	Reserve Bank of India
TAT	Turn Around Time

B. List of references including related policies / forms, RBI circulars, etc.

- RBI Master Circular on Customer Service in Banks Ref. No. RBI/2015-16/59 DBR No.Leg.BC. 21/09.07.006/2015-16 dated 01.07.2015.
- Internal Ombudsman Scheme 2018 of RBI (Ref. No. CEPD.CO.PRS. Cir.No.01/13.01.009/.2018-19 dated 03.09 2018).
- RBI Notification No. RBI/2020-21/87 CEPD.CO.PRD.Cir.No.01/13.01.013/2020-21 dated 27.01.2021 on Strengthening of Grievance Redress Mechanism.