



Customer Protection and Grievance Redressal Policy

June 16, 2017

This Customer Protection and Grievance Redressal Policy document is intended solely for the information and internal use of IPPB ('the Bank'), and is not intended to be and should not be used by any other person or entity.

The procedures performed are not an audit, or a compilation of the Company's financial statements or any part thereof, nor an examination of management's assertions concerning the effectiveness of the Company's internal control systems and detection of fraud, nor an examination of compliance with laws, regulations, or other matters. Accordingly, our performance of the procedures will not result in the expression of an opinion or any other form of assurance on the Company's financial statements or any part thereof, nor an opinion or any other form of assurance on the Company's internal control systems or its compliance with laws, regulations, or other matters.

Approvals

Date	Name	Designation
Jan 19, 2017	Approval from IPPB Board	

Version Control

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Nov 02, 2016	2.0	Second draft with DoP Advisor's comments incorporated
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1. Introduction

In a highly competitive business environment, customer satisfaction is of utmost importance for a sustainable business growth. India Post Payments Bank (IPPB or 'the Bank') believes that providing prompt and efficient service is essential not only to attract new customers, but also to retain the existing ones. As such, customer service and customer satisfaction shall be the priority focus area of the Bank.

The Bank shall make all efforts to provide prompt and efficient service to its customers. However, the Bank also acknowledges that customer grievances / complaints are an integral part of business for any corporate entity. Hence the 'Customer Protection and Grievance Redressal Policy' of the Bank is framed with an objective of timely resolution of all grievances / complaints to the satisfaction of the customers.

The Bank shall ensure that an Officer of the Bank shall be available for sufficient duration, at a fixed location, i.e., its branches, known to the customers at the district level, to attend to customer grievances and support the agent supervision.

The Bank shall ensure that the relevant portions of 'Customer Protection and Grievance Redressal Policy' are available in public domain at Bank branches and Customer Service Points (CSPs) as well as on the Bank's website.

This Policy shall come into force w.e.f. 30th January, 2017.

2. Guiding Principle

2.1. Underlying tenets of Customer Protection and Grievance Redressal Policy

2.1.1. The Bank's Customer Protection and Grievance Redressal Policy shall follow the following principles –

- All customers of the Bank shall be treated fairly at all times.
- Complaints raised by customers shall be dealt with utmost courtesy and in a timely manner.
- Customers shall be fully informed of avenues to escalate their grievances / complaints within the Bank and their rights to alternative remedy if they are not satisfied with the response provided by the Bank to their complaints.
- The Bank's employees shall work in good faith and without prejudice to the interest of the customers.

2.2. Structured system for redressal

2.2.1. In order to make the Bank's redressal mechanism more meaningful and effective, a structured system shall function at Corporate Office / Circle Offices / Bank branch / CSP, which shall ensure that redressal provided is just and fair, within the given frame-work of rules and regulations.

2.3. Customer's right to register grievance

- 2.3.1 The customer shall have full right to register his/her complaint if he/she is not satisfied with the services provided by the Bank or its business correspondents. The customer can register a complaint via Call Centre (Toll Free No. 155299) or through e-mail (contact@ippbonline.in) or in writing to nearest Bank Branch. The customer can also register the complaint in the complaint register or can drop it in the complaint box provided at the Bank branch.
- 2.3.2 In case the customer's complaint is not resolved within given time as specified in the Section 3.10.1 or the resolution provided is not to the customer's satisfaction, he/she can approach the next Appellate Authority of the Bank as specified in the section 3.10.5 with his/her complaint before approaching the Banking Ombudsman appointed by the RBI

2.4. Coverage

- 2.4.1. The Policy shall cover customer grievance related to all the products and services provided by the Bank through any of its channel, including CSPs.
- 2.4.2. In case of third party products, the scope shall be limited to the grievance related to the Bank's process. For other grievances related to third-party products, the Bank shall assist the customer in registering the grievance with the original provider.

3. Internal mechanism for handling customer grievances

3.1. Customer Service Committee of Board (CSCB)

- 3.1.1. The CSCB, a sub-committee of the Board, shall be responsible for evaluating and examining all the issues affecting the quality of customer service provided by the Bank. The meetings of the committee shall be held on half yearly basis and presided over by Chief Executive Officer (CEO). Besides CEO, the committee shall comprise of COO, two Directors and Head of departments looking after Customer Service, Operations, HR and IT. In-Charge (Customer Service) shall be the convener of the meeting. Other responsibilities of the CSCB shall include:
- 3.1.1.1. Review of 'Comprehensive Deposit Policy', including issues such as operations in the account of a deceased customer.
- 3.1.1.2. Review of product suitability based upon feedback received from customer.
- 3.1.1.3. Review the findings of annual survey of depositor satisfaction and the triennial audit of such services, as and when conducted by the Bank
- 3.1.1.4. Review the functioning of Standing Committee on Customer Service.
- 3.1.1.5. Review the performance of the Internal Ombudsman (IO).
- 3.1.2. The IO of the Bank shall be a Permanent Invitee of the CSCB

3.2. Standing Committee on Customer Service (SCCS)

- 3.2.1. The SCCS shall be chaired by the Chief Executive Officer (CEO) of the Bank and head of departments looking after Customer Service, Operations, HR and IT shall be its members. The Committee shall also comprise of two customers (preferably, one senior citizen and one woman) who will be nominated to Committee as ex-officio members for a period of one year. In-charge (Customer Service) shall be the convener of this committee. The Committee shall perform the following functions:
 - 3.2.1.1. 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. The Standing Committee may be entrusted not only with the task of ensuring timely and effective compliance of the RBI instructions on customer service, but also that of receiving the necessary feedback to determine that the action taken by various departments of the bank is in tune with the spirit and intent of such instructions.
 - 3.2.1.2. The Committee shall be responsible to ensure the Bank's adherence to regulatory instructions regarding customer service.
 - 3.2.1.3. The Committee shall submit a quarterly report on its performance to the CSCB.

3.3. Internal Ombudsman (IO)

- 3.3.1. The Bank shall appoint an IO as part of its internal grievance redressal mechanism. The IO shall be a person who has not worked in IPPB earlier.
- 3.3.2. All the complaints which are totally or partially rejected by the Bank shall be referred by Principal Nodal Officer to IO within two weeks of receipt of the complaint, before conveying the final decision to the complainant within a period of 30 days, from the receipt of the complaint.
- 3.3.3. The performance of the IO shall be reviewed by CSCB on half yearly basis.

3.4. Principal Nodal Officer and Nodal Officers

- 3.4.1. The Bank shall appoint a Principal Nodal Officer of the rank of General Manager (or its equivalent) who shall be responsible for the implementation of guidelines of regulatory authorities on customer service for the entire Bank.
- 3.4.2. The bank shall appoint Nodal Officers at their Circle Offices and inform the respective Office of the Banking Ombudsman under whose jurisdiction the Circle Office falls. The Nodal Officer so appointed shall be responsible for representing the bank and furnishing information to the Banking Ombudsman in respect of complaints filed against the bank. Wherever more than one Circle of a bank are falling within the jurisdiction of a Banking Ombudsman, one of the Nodal Officers shall be designated as the 'Principal Nodal Officer' for such Circles. In case, the customer is not satisfied with the resolution received from the Principal Nodal Officer, he / she may approach the Banking Ombudsman (RBI) or any other statutory/regulatory authority.

3.5. Branch Level Customer Service Committee (BLCSC)

- 3.5.1 The Bank recognizes that expectations / grievances can be better understood and addressed through personal interaction with customers by Bank's staff. As such each Bank branch shall constitute a BLCSC which will provide an additional forum for interaction with customers. Such meetings shall give a message that the Bank cares for its customers and values their feedback / suggestions for improvement in customer service.
- 3.5.2. Besides Branch Manager, the BLCSC should comprise of two customers (preferably, one senior citizen and a woman).
- 3.5.3. The objective of the committee shall be to:
 - 3.5.3.1. Collect customer feedback on services provided by the Bank branches / CSPs and take effective steps for further improvement in customer service based on the feedback received.
 - 3.5.3.2. Build and enhance trust amongst the customers.
 - 3.5.3.3. Create awareness about the services provided by the Bank.
- 3.5.4. Branch Manager shall ensure that proper record of agenda and minutes of such meetings is maintained.
- 3.5.5. Notice regarding date and time of holding of monthly BLCSC meeting shall be displayed by the Bank branch on its Notice Board.

3.6. Customer Service Department

- 3.6.1. The Bank shall set up a Customer Service Department at the Corporate Office, which will be responsible for formulation and annual review of Customer Protection and Grievance Redressal Policy of the Bank based upon change in regulatory guidelines as contained in Master Circular issued by RBI or due to any other reason. The Department shall exercise control and supervision over all the Circle Offices / Bank branches / CSPs in the matter of providing better customer service and resolving grievances.
- 3.6.2. Customer Service Department shall be responsible to compile the data of complaints received, disposed of and pending in each quarter and place the detailed analysis of such data before CSCB and SCCS on quarterly basis.
- 3.6.3. The Department shall also place the position of complaints received, disposed of and pending on weekly basis before the Principal Nodal Officer.
- 3.6.4. The Department shall also be responsible to examine the systemic deficiencies which are adversely impacting customer service and leading to recurring complaints. The Department shall place such issues before CSCB along with steps proposed to address these issues for providing efficient customer service.
- 3.6.5. The Department shall also prepare a list of complaints partially accepted or totally rejected by the Bank and forward such complaints to Principal Nodal Officer for ultimately forwarding to IO within two weeks of receipt of the complaint ,before conveying the final decision to the complainant within a period of 30days ,from the receipt of the complaint.

3.7. Reasons for Grievances

- 3.7.1. The customer complaint / grievance mainly arises due to following aspects:
- Attitudinal: Misbehavior with customers or harassment caused to the customer.
 - Operational: Deficiency in customer service due to gaps in standards of services expected and actual services rendered, etc.
 - Technological: Issues related to SMS alerts, mobile banking, ATM cards, etc.

3.8. Recording and Tracking of Complaints

- 3.8.1. Each complaint received at the Bank branch /contact centre shall be duly recorded in the CRM /CSRM (complaints redressal mechanism) and a unique reference number is send to the customer to his/her registered mobile number. Bank can also keep a complaint register at the branch for entering the customer complaints.
- 3.8.2. Each complaint received by the Bank shall be duly acknowledged to the customer within a maximum period of three days.
- 3.8.3. Once the complaint is received; it shall promptly be auto assigned to the concerned stakeholder for resolution. The complaint can be viewed by concerned stake holder and shall download the complaint, take corrective action to resolve it and enter the resolution against the relevant complaint in CRM/CSRM. Resolution of each complaint shall be intimated to the customer within the specified time limit / TAT (turnaround time).
- 3.8.3.1. All Complaints/feedbacks can be registered online without exception and where these are tendered manually, will be converted into electronic format within 3 days.
- 3.8.3.2. All acknowledgements will be transmitted online/electronically and where electronic transmission is not possible, hard copies of acknowledgements will only be manually sent.
- 3.8.3.3. All reports/reviews arising out of this policy including alerts will be triggered electronically.
- 3.8.3.4. The Bank is committed to maintain full transparency on implementation of this policy and to this extent shall adopt a system of accepting, putting, storing, aggregating and disposing 100% cases in electronic format.
- 3.8.3.5. The complaint can be viewed by the bank branch against which it is lodged. The Bank branch shall download the complaint, take corrective action to resolve it and enter the resolution against the relevant complaint in CRM/CSRM.

3.9. Resolution of grievances

- 3.9.1. The Branch Manager shall be responsible for the resolution of complaints / grievances in respect of customer service in Bank branches and linked CSPs.
- 3.9.2. All customer grievance issues related to a particular CSP shall be addressed both at the CSP and at the Bank branch in a coordinated manner to resolve the matter completely to the satisfaction of the customer.
- 3.9.3. If the Branch Manager feels that he / she is not in a position to resolve the complaint he may seek the guidance of Nodal Officer, and further if required, Nodal Officer may refer the case to the Principal Nodal Officer at Corporate Office.
- 3.9.4. The resolution communication (through letter / email) to customer from the Bank branch shall give details of the next Appellate Authority for further redressal.
- 3.9.5. The Circle Office shall send a monthly report on all the complaints received at respective offices as also at Bank branch / CSPs under their control to the Customer Service Department at the Corporate Office.

3.10. Time frame and escalation matrix

- 3.10.1. Time Schedule for Redressal of Complaints shall be as under:-

Type of complaint	No. of days
General complaints	15 days
Complaints forwarded by RBI / MOF / MPs / VVIP / DPG / Banking Ombudsman	15 days
Complaints from PM's Office	10 days
ATM complaints related to dispensation of cash*	5 days
Complaints related to point of sale transactions/Mobile Banking Service. Account debited but confirmation not received at merchant location i.e., charge-slip not generated.	5 days
In case of complaints requiring detailed investigations, which may take more than 15 days, the Bank will send an interim reply to the complainant explaining the reasons for delay in sending the final resolution.	

- 3.10.2. All efforts shall be made to resolve each complaint received by the Bank within the timeframe as specified above.
- 3.10.3. For any complaint which may require additional time for examination and resolution, a prompt communication shall be sent to the complainant informing him of the same.
- 3.10.4. Where the complaints are not resolved within the stipulated time frame, the concerned branch shall forward a copy of the same to the concerned Nodal Officer(s) / Principal Nodal Officer and keep him updated by giving the detailed

reasons regarding delay in redressal. This would enable the Nodal Officer(s) / Principal Nodal Officer to deal with any reference received from the Banking Ombudsman regarding the complaint more effectively.

- 3.10.5. Complaints from customer indirectly reflects on a weak spot in the working of the Bank and hence should be seen in the right perspective. Complaints received shall be analyzed from all possible angles. The Bank resolves to follow the following escalation matrix for resolution of all complaints / grievances –

Level	Office	Official
First	Bank Branch and CSPs	Branch Manager
Second	Circle Office	Nodal Officer
Third	Corporate Office	Principal Nodal Officer
Fourth	External	Banking Ombudsman at RBI

3.11. Framework for redressal of grievances relating to third party products

- 3.11.1. The Bank may, at times, have limited control over the service provided by the third-party for products sold through Bank's channel.
- 3.11.2. With this view, the Bank shall facilitate customer's grievance redressal by sharing the contact details of the nearest office of the product provider with the customer
- 3.11.3. However, if the complaint relates to the Bank's process, it shall be taken up for resolution as per the Bank's escalation matrix.

3.12. Sensitizing operating staff on handling complaints

- 3.12.1. The Bank shall impart training on an ongoing basis to all its employees and officers for making them understand the need of (i) rendering polite and courteous service to the customers and (ii) timely redressal of grievances of customers in a fair and transparent manner.
- 3.12.2. The trainings shall include subjects such as soft skills required to handle customers and win customer's confidence.
- 3.12.3. The Nodal Officer(s) shall also provide feedback to Principal Nodal Officer on training needs of employees and officers at various levels (including frontline staff) who will further send communication to the Human Resource Department for arranging the same.

4 Mandatory display requirement

- Details of rate of interest on deposit accounts and charges in respect of various services provided by the Bank shall be displayed at each Bank branch / CSP as also on the website of the Bank.

- Each Bank branch shall display on its notice board that Basic Savings Bank Deposit Account (BSBDA) and Basic Savings Bank Deposit Account - Small (BSBDA-Small) are opened by the Bank.
- KYC documents required for opening bank account shall be displayed by each branch.
- Each Branch shall display business hours.
- The name and contact particulars of the Nodal Officer(s) and Principal Nodal Officer of the Bank shall be displayed in the Bank branch / CSP premises and also on Bank's website to facilitate the customers to raise their grievances / suggestions regarding customer services rendered by the Bank.
- The contact details of Banking Ombudsman Office having jurisdiction over that area shall be displayed in the branch / CSP premises. The Banking Ombudsman Scheme and contact particulars of all the offices of Banking Ombudsman shall also be displayed on the Bank website.
- Copies of the Citizen Charter, Code of Bank's Commitment to Customers, Customer Protection and Grievance Redressal Policy, Cheque Collection Policy and Customer Rights Policy shall be available in the Bank branches / CSPs for reference of customers and shall also be displayed on the Bank website.

5. Disclosure of complaints

Enhanced disclosures on complaints: Disclosures serve as an important tool for market discipline as well as for consumer awareness and protection. Appropriate disclosures relating to the number and nature of customer complaints and their redress facilitate customers and interested market participants to better differentiate among banks to take an informed decision in availing their products and services. The disclosures are summary in nature and comprise as per annexure III

6. Policy Revision

- 6.1.1 The Customer Service Department shall be responsible to own, maintain and update this policy.
- 6.1.2 This Policy shall undergo an annual review consequent upon any change in regulatory guidelines, market conditions, etc. Such changes shall be placed before the Board of Directors for approval. The reviewed policy shall be circulated for information of all field functionaries.

Annexure I – Glossary

Term	Description
IPPB	India Post Payments Bank
CSP	Customer Service Point
IO	Internal Ombudsman
CRM/CSRM	Customer Request Management/ Customer Service Request Management
CSCB	Customer Service Committee of Board
SCCS	Standing Committee on Customer Service
BLCSC	Branch Level Customer Service Committee

Annexure II – References

Sr. No.	Reference	Description
1	RBI Master Circular DBR No. Leg. BC . 21/09.07.006/2015-16, dated 1st July, 2015	Master Circular on Customer Service in Banks, consolidating the important instructions issued by RBI in the area of customer service up to June 30, 2014
2	Banking Codes and Standards Board of India: Code of Bank's Commitment to Customers	This code sets minimum standards of banking practices member banks have to follow while they deal with individual customers
3	Indian Bank's Association: Model Policy on Grievance Redressal in Banks	This draft policy provides a framework for grievance redressal that may be replicated with suitable amendments by individual banks
4	CEPD.CO.PSR.Cir.No.01/13.01.009/2018-19	Internal Ombudsman Scheme 2018-Implimenttion by banks
5.	RBI/2019-20/67 DPSS.CO.PD No.629/02.01.014/2019-20	RBI circular on Harmonisation of Turn Around Time (TAT) and customer compensation for failed transactions using authorised Payment Systems
6.	RBI/2020-21/87 CEPD.CO.PRD.Cir.No.01/13.01.013/2020-21	Strengthening of Grievance Redress Mechanism in Banks.

Annexure III – Enhanced disclosures of Complaints

Enhanced disclosures to be made by banks on complaints and grievance redress			
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		
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					