

## Export Credit Guarantee Corporation of India Ltd

### **CUSTOMER GRIEVANCE REDRESSAL POLICY**

[Pursuant to Board Resolution No. 371/S1-01 dated 26<sup>th</sup> November 2010]

1. The Grievance redressal mechanism of an organization is the gauge to measure its efficiency and effectiveness as it provides important feedback on the working of the Organization. The main purpose of a Grievance Policy is to place an appropriate mechanism whereby the Customer who believe(s) that he/ she has been wronged by any act of the Company is afforded a fair opportunity to redress his/ her Grievance.

2. We have already forwarded the relevant IRDA Guidelines to all the BMs and H. O. Ds on 9<sup>th</sup> instant.

#### **Objectives:**

3. The objectives of the Grievance Redressal Policy are:

- (a) To develop an organizational framework to promptly address and resolve customer Grievances fairly and equitably;
- (b) To provide enhanced level of customer satisfaction;
- (c) To provide easy accessibility to the customer for an immediate Grievance redressal.
- (d) To educate the customers about their responsibilities to access benefits due under the policies;
- (e) To ensure that the customers are treated fairly at all times;
- (f) To identify systemic flaws in the operational functions of the organization and products suggesting corrective measures;
- (g) To put in place a monitoring mechanism to oversee the functioning of the Grievance Redressal Policy.

#### **Definition of "Grievance / Complaint" (IRDA provided)**

4. A "Grievance / Complaint" is defined as any communication that expresses dissatisfaction about an action or lack of action, about the standard of service/ deficiency of service of an insurance company and/or any intermediary or asks for remedial action.

## **STRUCTURE OF GRIEVANCE REDRESSAL MECHANISM**

5. As per the directions received from I R D A the company shall have 3-tier Grievance redressal machinery with designated Grievance Officer at each level. The Corporate Grievance Cell shall be functioning at the apex level, the Regional Grievance Cell at the Regional Office level and the Grievance Cell at the Branch level. The principal function of Branch level Grievance Cell would be to redress the Grievance complaints received by the Branch, it is expected that the Grievances Cell at the Regional level and Head Office level to play a more proactive role in not only redressing Grievances, but in minimizing the incidence. The Cells at the Corporate and Regional level shall carry out a root cause analysis on the Grievances to provide inputs to the corporate management on product redesign, policy redesign and placing best practices, etc.

### **Maximum 3-level Grievance Redressal Officers & ACGC**

#### **Branch Office Level**

6. The Branch Manager of the Branch Office would be the 1<sup>st</sup> Level Grievance Officer and he/ she would attend to all Grievances received by the branch in respect of decisions taken at the Branch by any Br. Official below BM level. However, grievances relating to decisions by the BM shall be forwarded to the Grievance Officer at RO.

#### **Regional Office Level**

7. The Regional Manager shall be the RO:Grievances Officer in respect of complaints/ grievances on below-RM-level decisions taken within the Region.

#### **Head Office Level**

8. The General Manager in-charge of grievances shall be the Grievances Officer at HO responsible for attending to all grievances/ complaints pertaining to actions / decisions below GM-level officials at HO and ROs (except grievances attended but not solved by RMs).

#### **The Apex Customer Grievance Committee (ACGC) at HO**

9. The highest authority for customer grievance redressal in the organization shall be the ACGC, a committee constituted under the Chairmanship of the Chairman-cum-Managing Director and comprising of such members as may be provided from time to time.

10. **The Grievance Redressal Procedure/ System:** IRDA stipulates a maximum time limit of 15 days for disposal of a customer grievance. Though a maximum period of fifteen days for disposal of our claim representation cases sounds a bit too ambitious a target if our past record is any indication is to go by, we cannot be oblivious about the spirit behind such a stipulation from the Regulatory body. We need to put in place a system that eschews all avoidable delays. Accordingly, it is proposed that no grievance shall have more than two levels before it is finally considered and disposed of by ACGC.

(a) The designated Grievance Officers shall be –

- The Branch Manager at every BO;
- The Regional Manager at every RO; and
- The General Manager (Grievances) at HO.

(b) A grievance at the first stage shall be seen by a level immediately above the level at which the cause of grievance had occurred. That is, if the grievance is with regard to an act by a branch official working under the Branch Manager, the Branch Manager will be the one to consider such grievance in the first stage. However, if the grievance is with regard to an act by a BM, then in the 1<sup>st</sup> stage it would be considered by the concerned RM and for grievances arising from original acts of a RM, by the designated GM at Head Office.

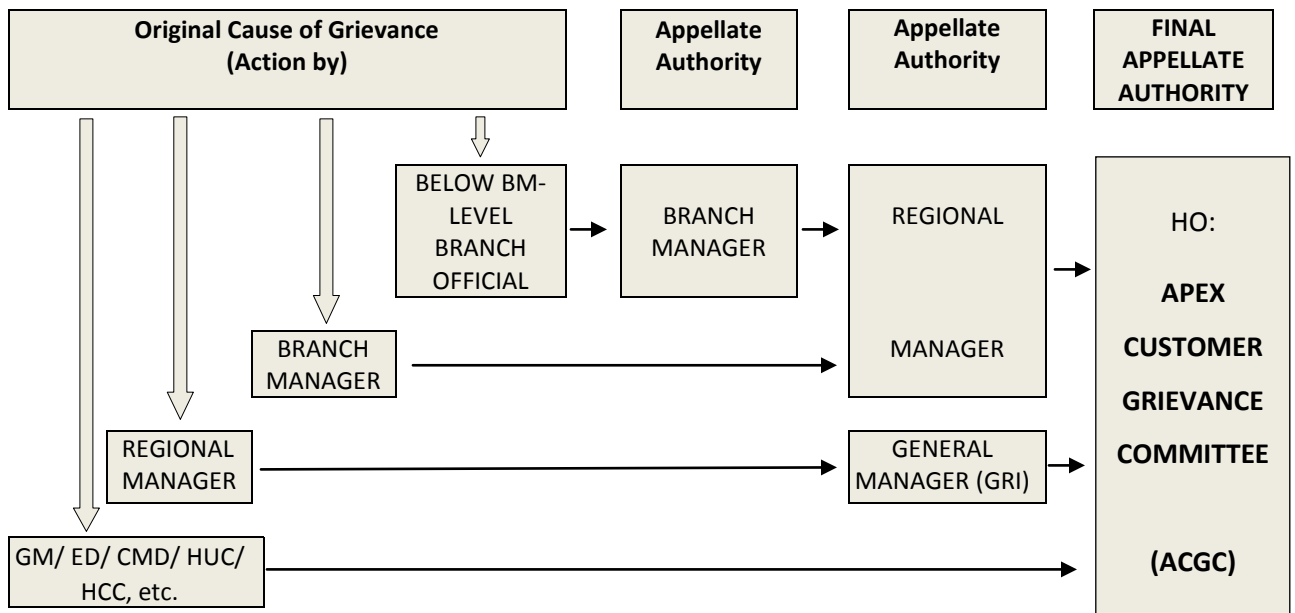
(c) As regards grievances originating from original acts of GMs, ED, CMD and High-level Claims Committee (HCC), the designated authority for grievance redressal shall be the Apex Committee at HO under the chairmanship of CMD, viz., the Apex Customer Grievance Committee (ACGC)

(d) **Composition of ACGC:** The Apex Customer Grievances Committee (ACGC) shall, as the name suggests, be the ultimate in-house authority for resolution of customer grievances. To begin with, ACGC shall have not more than 4 members comprising of CMD, who shall be its Chairman of the Committee and *the Chief Grievance Officer*. The other members of ACPC will be the Executive Director, the General Manager (Grievances), and the General Manager concerned with the subject matter of grievance under consideration. [e.g., if the subject matter of grievance is an exporter's claim under Policy, then GM (Policy claim)].

11. ACGC may exercise 'original' powers for grievance redressal with regard to grievances arising from act of commission/ omission by GMs, ED, CMD and the empowered Committees like HCC, HUC, etc. ACGC shall also be the final and ultimate appellate authority within the organization with regard to grievances originally disposed of by RMs / GM. Thus, while ACGC will be the ultimate in-house appellate authority for any grievance arising from an original act by a BM or RM, it shall be the first and final grievance authority for any grievances against an act by GMs, ED, CMD or the empowered Head Office Committees. In short, ACGC's scope for consideration and final disposal of grievances shall be as under. Viz., –

- (a) *ACGC: 3<sup>rd</sup> & Final Appellate Authority:* Grievances arising from original acts of below-BM level branch officials and attended to but not resolved in the first instance by BM and thereafter by RM in 2<sup>nd</sup> stage;
- (b) *ACGC: 2<sup>nd</sup> & Final Appellate Authority:* Grievances arising from any act of a Branch Manager, originally attended to by the First Appellate Authority, i.e., the Regional Manager but not resolved;
- (c) *ACGC: 2<sup>nd</sup> & Final Appellate Authority:* Grievances arising from any act of a Regional Manager and attended to by the First Appellate Authority HO: General Manager but not resolved;
- (d) *ACGC: 1<sup>st</sup> & Final Authority:* Grievances arising from original acts of General Managers, Executive Director, CMD and empowered HO committees;

Graphic representation of ECGC grievance redressal machinery



12. Under the proposed procedure –
- A grievance against any act of omissions or commissions of a BM shall go to the concerned RM at the 1<sup>st</sup> stage. If the customer remains unsatisfied, any further representation will be seen and disposed of directly by the Apex Customer Grievance Committee (ACGC);
  - A grievance against an original act of omission or commission by a Regional Manager shall be seen by GM at HO in the 1<sup>st</sup> stage. If the customer remained unsatisfied by the decision of GM, any further grievance thereon shall be seen and disposed of by the Apex Customer Grievance Committee.
  - ACGC, in addition to it being the ‘appellate authority’ in respect of representations against grievances disposed by RMs and GM(Grievances), be the only designated authority empowered to consider and dispose of original representations against acts of omissions/ commissions/ deficiencies by GMs, ED, CMD or HO: Committees like the HCC, HUC, etc. ACGC. In short, such grievances shall have a single-stage final disposal. If thus finally disposed of, no further representation shall be entertained.
13. Thus, no grievance shall have more than one or a maximum of two levels of appeals before it reached the apex level, the Customer Grievance Committee (ACGC) for its final disposal, as shown in the graphic representation given supra. Thus, a customer shall have to submit a matter for ECGC’s consideration not more than a maximum of three times, including consideration of grievance representations.
14. Branches and Regional Offices shall send their Quarterly Reports on Grievance Disposals to HO:Customer Grievance Management Cell (CGMC). HO:CGMC shall prepare consolidated Quarterly Reports on Grievance Management of the Corporation and place it before the Board’s Sub-Committee on Protection of Policyholders Rights and/ or the Board of Directors. CGMC shall also ensure that all necessary and relevant reports and returns in this regard are submitted to IRDA too.

**Grievance Redressal System and Procedures:**

15. Any communication conveying dissatisfaction about an action taken or lack of action (delay) in respect of any of the services of the Corporation or of its intermediaries in written,

verbal or digital form shall be taken as grievance or complaint and it shall be recorded by the receiving office in its Grievances Register and –

- (a) A serial number will be assigned to it together with the date of receipt;
- (b) A written acknowledgement to a complainant shall be sent promptly and in any case within not more than 3 working days;
- (c) The acknowledgement shall contain –
  - (i) the name and designation of the officer (if the designated officer is in another office, then the relevant address too) who will deal with the grievance;
  - (ii) Information that necessary action will be taken within fifteen working days from the date of receipt of the grievance by the officer concerned;
  - (iii) Name, address, email-id and phone number of the authority to which the complainant could escalate the matter if his Grievance is not redressed within the specified timeframe or if he is not satisfied with the action taken.

16. If the office receiving the grievance/ complaint is not the one designated to consider and dispose it, the receiving office shall forward it to the designated office, but after having complied with the requirements at (a) to (c) above.

17. The office designated to consider the matter shall make every effort to ensure that grievances / appeals are considered and disposed of within the stipulated period of fifteen days.

18. If a customer is not satisfied with the any decision by the apex body, ACGC may have to be returned to the complainant with appropriate advise that he has exhausted all in-house avenues for redressal of his grievance and informing about his options for further appeal.

**Closure of Grievance:**

19. The complaint shall be considered as disposed of and closed when:

- (a) The designated grievance redressal officer / authority (i.e., ACGC) has acceded to the request of the complainant fully;
- (b) Where the complainant has indicated acceptance of the response of the insurer in writing;
- (c) Where the complainant has not responded to the insurer within eight weeks of being intimated the final decision of the grievance officer/ ACGC on his grievance/ complaint;

- (d) Where the Grievance Redressal Officer has certified that the company has discharged its contractual, statutory and regulatory obligations and therefore has closed the complaint.

**Online registration of Complaints:**

20. Suitable Online based system for registration and tracking the status of grievances is being developed in-house and will be introduced very shortly.

**Exclusions:**

21. The following allegations/ complaints shall not be construed or taken up for consideration and disposal as 'Customer Grievances':

- (a) Anonymous complaints or Frivolous cases in respect of which inadequate supporting details are provided;
- (b) Cases involving decisions / policy matters in which the complainant has not been affected directly/ indirectly;
- (c) Cases where quasi-judicial procedures are prescribed for deciding matters or cases that are sub-judice;
- (d) A Grievance which has already been disposed off by the Grievance Cell at Head Office;
- (e) Complaints of corruption. This should be lodged with the vigilance officer of the Corporation and dealt with separately.

**Customer Interaction and Focus**

22. ECGC recognizes that customer's expectations/ requirements/ grievances can be better appreciated through personal interaction with customers by ECGC officials. Structured customer meets will give the message to the customers that ECGC cares for them and values their feedback/ suggestions for improvement in customer service. Complaints arising on account of lack of awareness among customers about ECGC services may be avoided through customer interactions and customer awareness programs.

23. ECGC shall take all efforts to abide by and enforce its Citizen Charter in all its operations and shall respect and enforce policyholders' rights as enshrined in the relevant IRDA document.

**Conclusion**

24. The Grievance Redressal Policy of the Corporation adopted in pursuance Board Resolution No. 371/S-1/01 dated 26<sup>th</sup> November 2010 is available on our website. The

Policy herein dealt with is in accordance with the mandatory IRDA “Guidelines for Customer Grievance Redressal by Insurance Companies” which has become effective from August 01, 2010. Compliance with these Guidelines are mandatory.

-----//-----