

# **Internal Ombudsman Policy 2024-25**

### TITLE & COMMENCEMENT

- 1. In the present scenario of competitive banking, excellence in customer service is the most important tool for not only retention of existing customers but also customer acquisition for sustained quality business growth. Banks, being service organisations, are serving its customers providing services like deposit related, advances related and ancillary services, etc. We, as a service oriented organisation, take customer service and customer satisfaction as our prime concern and strive to excel in this area. We believe that providing prompt and efficient customer service is essential not only to attract new customers but also to retain existing clientele base. Serving millions of customers to their full satisfaction, however, may not be possible all the times due to either internal or external factors in one way or the other. These factors includes functional / system deficiency, staff attitude/apathy, etc., resulting in grievances / complaints from such customers.
- 2. The above deficiencies and/or deliberate attempt by the staff in not providing customer service comprising above, leads to customer dissatisfaction and complaints thereon. RBI has further widened the scope to include deficiencies arising out of sale of insurance/mutual fund/other products by bank, mobile banking/e-banking services / digital transactions. In short any services provided by bank to its customer may be a reason for a complaint / grievance of the customer and/or disconnect between customer and bank, at times resulting in action detrimental to the interest of bank
- 3. Complaints give us a scope for introspecting ourselves, to improve the functioning/systems and procedures, fix bugs, if any, improve upon services upon the feedback being imparted by such complainants



- 4. The customer reserves full right to register his/her grievance if not satisfied with the services provided by the bank. He/ She can submit his/ her complaint in any mode of his/her convenience such as in person, in writing, over telephone, through e-mail or through 24x 7 online Call Centre or website of Bank. The complaint can be made by the customer at Bank branch/RO/ZO/CO or at designated government complaint portals.
- 5. A detailed policy on customer grievance redressal mechanism is approved by the Board of Directors of the Bank on 03.03.2023, comprising apart from the procedure for handling customer grievances, mechanism and the turnaround time (TAT) for resolutions of complaints.
- 6. If a customer's complaint is not resolved within stipulated time frame or otherwise if he/she is not satisfied with the resolution/ solution provided by the bank, he/she can approach to Banking Ombudsman of RBI for resolution of Complaint for example from Branch to Region, from Region to Zone etc., for resolution. However, if he/she is not still satisfied with the resolution process and the resolution thereon, he / she can approach Banking Ombudsman (hereinafter referred as BO) or can avail other legal avenues for grievance redressal.
- 7. Reserve Bank of India have advised all public-sector, select private and foreign banks to appoint Internal Ombudsman (hereinafter referred as IO) as an independent authority to review complaints that were partially or wholly rejected by the respective banks.
- 8. The IO mechanism was set up with a view to strengthen the internal grievance redressal system of banks and to ensure that the complaints of the customers are redressed at the level of the bank itself by an authority placed at the highest level of bank's grievance redressal mechanism so as to minimize the need for the customers to approach other fora for redressal.



- 9. The Reserve Bank institutionalized the Internal Ombudsman mechanism in various regulated entities vide instructions / guidelines contained in the Internal Ombudsman Scheme 2018- Implementation by banks dated September 3, 2018, Internal Ombudsman Scheme for Non-Bank System Participants, 2019 dated October 22, 2019, Appointment of Internal Ombudsman by Non-Banking Financial Companies dated November 15, 2021 and Reserve Bank of India (Credit Information Companies Internal Ombudsman) Direction, 2022 dated October 6, 2022. The Internal Ombudsman mechanism has been set up with a view to strengthen the Internal Grievance Redress system of the regulated entities.
- 10. A review of Internal Ombudsman schemes has been undertaken by the Reserve Bank in line with the integration of the erstwhile three RBI Ombudsman Schemes as also with the objective to improve the customer service standards in regulated entities. The framework reaffirms that the Internal Ombudsman mechanism should work as envisaged and the Internal Ombudsman shall be positioned as an independent, apex level authority on consumer grievance redress within the regulated entities.

RBI has issued Master Direction vide Circular no RBI/CEPD/2023-24/108 dated, December 29,2023, on Reserve Bank of India (Internal Ombudsman for Regulated Entities ) Direction,2023. Highlights of MD of RBI are as under:

### **Definitions**

- (1) In these Directions, unless the context states otherwise, the terms herein shall bear the meanings assigned to them as below:
- (a) "Bank" means a 'Banking company', a 'corresponding new bank' and 'State Bank of India' as defined in Section 5 of the Banking Regulation Act, 1949 (Act 10 of 1949) that are included in the Second Schedule of the Reserve Bank of India Act,



1934 (Act 2 of 1934), but does not include a bank in resolution or winding up or under directions or any other bank as specified by the Reserve Bank;

- (b) "Banking Outlet" is a fixed-point service delivery unit, manned by either bank's staff or its business correspondent where services of acceptance of deposits, encashment of cheques / cash withdrawal or lending of money are provided for a minimum of four hours per day for at least five days a week;
- (c) "Competent Authority" means Executive Director In-charge of customer service for banks, Executive Director / Managing Director / Chief Executive Officer for Non-Banking Financial Companies, Managing Director / Chief Executive Officer for Non-bank System Participants, and Managing Director / Chief Executive Officer for Credit Information Companies;
- (d) "Complaint" means a representation in writing or through other modes alleging deficiency in service on the part of the regulated entity and seeking relief thereon;
- (e) "Credit Information Company (CIC)" means a company as defined in the Companies Act, 2013 (18 of 2013) and has been granted a certificate of registration under sub-section (2) of section 5 of the Credit Information Companies (Regulation) Act, 2005 (30 of 2005);
- (f) "Deficiency in service" means a shortcoming or an inadequacy in any service, which the regulated entity is required to provide statutorily or otherwise, which may or may not result in financial loss or damage to the customer;
- (g) "Deputy Internal Ombudsman" means any person appointed under clause 6 of these Directions; 3
- (h) "Financial Sector Regulatory Body" means regulatory body for financial sector entities and includes:
  - (i) The Reserve Bank of India established under the Reserve Bank of India Act, 1934;
  - (ii) The Securities and Exchange Board of India established under the Securities



and Exchange Board of India Act, 1992;

- (iii) The Insurance Regulatory and Development Authority of India established under the Insurance Regulatory and Development Authority of India Act, 1999;
- (iv) The Pension Fund Regulatory and Development Authority established under the Pension Fund Regulatory and Development Authority Act, 2013;
- (i) "Internal Ombudsman" means any person appointed under clause 5 of these Directions;
- (j) "Non-Banking Financial Company (NBFC)" means an NBFC as defined in Section 45-I (f) of the Reserve Bank of India Act, 1934 and registered with the Reserve Bank; but does not include a standalone Primary Dealer, Core Investment Company, an Infrastructure Debt Fund-Non-Banking Financial Company (IDF-NBFC), a Non-Banking Financial Company Infrastructure Finance Company (NBFC-IFC), NBFC- Account Aggregator, NBFC under Corporate Insolvency Resolution Process, NBFC in liquidation and / or winding up, or under directions of Reserve Bank of India or any other NBFC specified by the Reserve Bank;
- (k) "Non-bank System Participant (NBSP)" means any person other than a bank participating in a payment system as defined under Section 2 of the Payment and Settlement Systems Act, 2007 including a 'System Provider'1;
- (1) "Payment System" means a system that enables payment to be effected between a payer and a beneficiary, involving clearing, payment or settlement service or all of them, but does not include a stock exchange; 1 'System Provider' means and includes a person who operates an authorized payment system as defined under Section 2 of the Payment and Settlement Systems Act, 2007. 4
- (m) "Regulated Entity (RE)" means a bank or an NBFC or an NBSP or a CIC as defined in these Directions, or any other entity as may be specified by the Reserve Bank from time to time;
- (n) "Related Party" shall include related party as defined in sub-clause 76 of section 2 of the Companies Act, 2013 and related party as per the applicable accounting



standards. (2) All other expressions, unless defined herein, shall have the same meaning as assigned to them under the Banking Regulation Act, 1949, the Reserve Bank of India Act, 1934, the Payment and Settlement Systems Act, 2007, the Credit Information Companies (Regulation) Act, 2005, the Credit Information Companies Rules, 2006, the Credit Information Companies Regulations, 2006, or the Reserve Bank – Integrated Ombudsman Scheme (RB-IOS), 2021 or regulations, directions and guidelines issued by the Reserve Bank of India.

### **Appointment of Internal Ombudsman**

- (1) Bank shall appoint the Internal Ombudsman after satisfying themselves that the following prerequisites are fulfilled for the appointment of Internal Ombudsman:
  - (a) The Internal Ombudsman shall either be a retired or serving officer, in the rank equivalent to a General Manager of another bank / Financial Sector Regulatory Body
  - / NBSP / NBFC / CIC, having necessary skills and experience of minimum seven years of working in areas such as banking, non-banking finance, regulation, supervision, payment and settlement systems, credit information or consumerprotection;
  - (b) The Internal Ombudsman shall previously not have been employed, nor presently be employed, by Bank or Bank's related parties.
- (2) The Internal Ombudsman shall not be over 70 years of age before the completion of the tenure.
- (3) Bank may appoint more than one Internal Ombudsman depending on the volume of complaints received by them to ensure continuity of operations during the absence of the Internal Ombudsman. While appointing additional Internal Ombudsman, the Bank shall consider the need for diversity of experience of the incumbents to deal with different types of cases. In such cases, the Bank may clearly define the jurisdiction of each Internal Ombudsman.



### **Appointment of Deputy Internal Ombudsman**

- (1) Bank may appoint one or more Deputy Internal Ombudsman depending on the volume of complaints received by them, who would assist the Internal Ombudsmanin the quality disposal of the complaints.
- (2) The Deputy Internal Ombudsman shall either be a retired or serving officer, not below the rank of Deputy General Manager of another bank / Financial Sector Regulatory Body

/ NBSP / NBFC / CIC, having necessary skills and experience of minimum five years of

working in areas such as banking, non-banking finance, regulation, supervision, paymentand settlement systems, credit information or consumer protection.

- (3) The Deputy Internal Ombudsman shall not be over 70 years of age before the completion of the tenure.
- (4) The Deputy Internal Ombudsman shall functionally report to the Internal Ombudsman, who will be the final authority / decision-making authority while dealing with the complaints. In the temporary absence of the Internal Ombudsman, not exceeding a period of 15 working days, the Deputy Internal Ombudsman may function as the Internal Ombudsman for the limited purpose of reviewing the rejected complaints. Prior information shall be provided to Consumer Education and Protection Department, Central Office, Reserve Bank of India (iocepd@rbi.org.in) in case of temporary absence of the Internal Ombudsman exceeding 15 working days, advising inter-alia, details of alternate arrangements being put in place. However, such temporary absence should not exceed 30 days.

### Tenure of Internal Ombudsman / Deputy Internal Ombudsman

(1) The appointment of the Internal Ombudsman / Deputy Internal Ombudsman in the regulated entity is of a contractual nature. The tenure of the Internal Ombudsman / Deputy Internal Ombudsman in the regulated entity shall be a fixed term of not less thanthree years, but not exceeding five years.



- (2) The Internal Ombudsman / Deputy Internal Ombudsman shall not be eligible for reappointment or for extension of term in the same regulated entity. The tenure of the Internal Ombudsman / Deputy Internal Ombudsman shall be indicated in the appointmentletter.
- (3) The Internal Ombudsman / Deputy Internal Ombudsman cannot be removed before the completion of his / her contracted term without the explicit approval of the Reserve Bank of India. In case the vacancy arises on account of reasons beyond the control of the regulated entity (such as death, resignation, incapacitation, terminal illness, etc.), the regulated entity shall inform Reserve Bank of India within 10 working days from the date of such vacancy. Bank shall appoint a new Internal Ombudsman / Deputy Internal Ombudsman as per eligibility criteria specified under clause 5 and clause 6 of these Directions within three months from the date of vacancy and submit a report within 5 working days from the date of appointment of the new Internal Ombudsman / Deputy Internal Ombudsman as per clause 15 of Chapter V of these Directions.
- (4) The Principal Nodal Officer or the Nodal Officer, liaising with the offices of the RBI Ombudsman, shall not act as Internal Ombudsman / Deputy Internal Ombudsman or *viceversa*, even during the temporary absence of either.
- (5) Bank shall ensure that the post of the Internal Ombudsman does not remain vacant at any point of time. The Bank shall undertake the process of fresh appointment well in advance to fill the vacancy before the expiry of the tenure of theincumbent Internal Ombudsman and ensure that there is a minimum overlap of at least one month between the time of demitting of office of the outgoing Internal Ombudsman and the incoming Internal Ombudsman. Bank shall undertake the process of fresh appointment at least three months before the expiry of the term of the incumbentInternal Ombudsman.

### **Administrative Oversight**

(1) The Internal Ombudsman shall report to the Competent Authority, as defined under clause 3(1)(c) of the Directions, of the Bank administratively, and to the Board of the bank functionally.



#### Secretariat and Cost of the office of Internal Ombudsman

- (1) Bank shall depute such number of its officers or other staff to the office of the Internal Ombudsman as is considered necessary for the smooth functioning of theoffices of the Internal Ombudsman. All other requisite office infrastructure, including information technology support shall be made available to the office of the Internal Ombudsman to enable the Internal Ombudsman discharge his / her responsibilities effectively and efficiently.
- (2) Customer Service Committee / Consumer Protection Committee of the Board of the Bank shall determine the structure of emoluments, facilities and benefits accorded to the Internal Ombudsman / Deputy Internal Ombudsman, which should be appropriate keeping in view the stature and position of the Internal Ombudsman / Deputy Internal Ombudsman being at the apex of the grievance redress mechanism of the regulated entity as also the need to attract experienced persons with requisite expertise. These emoluments, facilities and benefits accorded to the Internal Ombudsman / Deputy Internal Ombudsman, once determined, shall not be changed during the tenure of InternalOmbudsman / Deputy Internal Ombudsman.
- (3) The office of the Internal Ombudsman shall preferably be placed in the Head Office or Corporate Office of the Bank.

### **Internal Audit**

- (1) Bank shall conduct an internal audit of the implementation of these Directions on a yearly basis. The internal audit of the Bank shall cover the implementation and compliance with these Directions inter-alia, including:
  - (a) The adequacy of the infrastructure (space, IT infrastructure, human resources, etc.) provided to the office of Internal Ombudsman and whether it is in line with the volume of complaints and the stated position of the Internal Ombudsman at the apex of the grievance redress mechanism:



- (b) Implementation of auto-escalation of the partly or wholly rejected complaints to the Internal Ombudsman within 20 days and adherence with various timelines indicated in these Directions;
- (c) Actions by the Internal Ombudsman with regard to analysis of complaints, reports submitted to RBI and the regulated entity, efforts made by Internal Ombudsman for review and quality disposal of the rejected complaints, support provided by the Bank towards raising awareness about types of grievances, and developing uniformity of approach in handling of complaints across the bank as also the support provided to the Internal Ombudsman for redress of the complaints;
- (d) Adherence with various timelines indicated in these Directions.
- (2) The scope of the internal audit shall exclude any assessment of the correctness of decisions taken by the Internal Ombudsman.

### Role and Responsibilities of Internal Ombudsman

- (1) The Internal Ombudsman shall not handle complaints received directly from the complainants or members of the public but deal with the complaints that have already been examined by the Bank but have been partly or wholly rejected by the Bank.
- (2) The following types of complaints shall be outside the purview of these Directions and shall not be handled by the Internal Ombudsman:
  - (a) Complaints related to corporate frauds, misappropriation etc., except those resulting from deficiency in service, if any, on the part of the regulated entity;
  - (b) References in the nature of suggestions and commercial decisions of regulated entity. However, service deficiencies in cases falling under 'commercial decisions' will be valid complaints for the Internal Ombudsman;
  - (c) Complaints / references relating to (i) internal administration, (ii) human resources, or (iii) pay and emoluments of staff in the Bank.



- (d) Complaints which have been decided by or are already pending in other for such as the Consumer Disputes Redressal Commission, courts, etc.;
- (e) Disputes for which remedy has been provided under Section 18 of the Credit Information Companies (Regulation) Act, 2005.

Bank shall forward all rejected / partially rejected complaints under the categories (a) and (b) above to the Internal Ombudsman/s. The Internal Ombudsman shall look for inherent deficiency in service in such cases and take a view whether any of these complaints can be exempted under (a) and / or (b) above as decided by the Bank.

- (3) Complaints that are outside the purview of these Directions shall be immediately referred back to the Bank by the Internal Ombudsman.
- (4) The Internal Ombudsman shall analyse the pattern of complaints such as product / category wise, consumer group wise, geographical location wise, etc., and suggest means for taking actions to address the root cause of complaints of similar / repeat natureand those that require policy level changes in the Bank. The Internal Ombudsman shall examine the complaints based on records available with the Bank, including any documents submitted by the complainant and comments or clarifications furnished by the Bank to the specific queries of the Internal Ombudsman. The Internal Ombudsman may seek additional information and documents from the complainant, through the Bank. In the case of CICs, the Internal Ombudsman may seek additional information from the concerned Credit Institution/s (CI)through CIC. The Internal Ombudsman must record a "reasoned decision" in each case.
- (5) The Internal Ombudsman may hold meetings with the concerned functionaries of the Bank and seek any record / document available with the Bank that is necessary for examining the complaint and reviewing the decision. The Bank shall furnish all records and documents sought by the Internal Ombudsman to enable expeditious resolution of the complaints without any undue delay.



- (6) The Internal Ombudsman shall, on a quarterly basis, analyse the pattern of all complaints received against the Bank, such as entity-wise (for CICs), product-wise, category-wise, consumer group-wise, geographical location-wise, etc., and may provide inputs to the Bank for policy intervention, if so warranted.
- (7) The Internal Ombudsman shall not represent the Bank in legal cases beforeany court or fora or authority.
- (8) In cases of conciliation, where the decision of the Internal Ombudsman is accepted by the complainant, a statement showing the terms of agreement duly signed by the complainant, shall be kept on record.

### **Board Oversight**

- (1) The Internal Ombudsman shall furnish periodic reports (including the analysis of complaints) on his / her activities to the Committee of the Board handling customer service and protection, preferably at quarterly intervals, but not less than half yearly intervals. Bank shall put in place a system for discussion of cases, in which the decision of the Internal Ombudsman has been rejected by the Bank, by the Customer Service Committee / Consumer Protection Committee of the Board of the Bank. The rejection of the decision taken by the Internal Ombudsman shall be done with the approval of the Competent Authority as defined under clause 3(1)(c) of these Directions.
- (2) The Audit Committee of the Board of the Bank can refer to the Internal Ombudsman, matters in respect of cases mentioned at Clause 11(2)(a) of these Directions.
- (3) The Internal Ombudsman shall be designated as an ex-officio member or a permanent invitee to the meetings of the Committee of the Board of Bank handling customer service and protection.

### **Reporting to Reserve Bank**

(1) The Bank shall put in place a system of periodic reporting of information to Consumer Education and Protection Department, Central Office, Reserve Bank of India, on a quarterly and annual basis as per formats provided in the Annexure. These reports shall be submitted on or before the 10<sup>th</sup> day of the month



following the quarter/year for which they are due.

(2) The Bank shall, within five working days of appointment of the Internal Ombudsman or Deputy Internal Ombudsman, furnish the details of the official so appointed to the Consumer Education and Protection Department, Central Office, Reserve Bank of India (<a href="mailto:iocepd@rbi.org.in">iocepd@rbi.org.in</a>) in the following format:

1.	Name of the Internal Ombudsman / Deputy Ombudsman	
2.	Details of the last positions held/ organization names	
3.	Date of Appointment	
4.	Term (in years)	
5.	Brief professional profile, including previous exposure to	
	financial services highlighting those that make them	
	eligible for	
	appointment	
6.	Contact details (telephone, email, address)	

### Role at various levels & objectives of scheme

RO/ZO/Departments of CO should send all complaints rejected either wholly
or partially need to be placed before the Internal Ombudsman of the Bank
prior to being communicated to the complainant.



- 2. To ensure that all complaints, which are rejected, wholly or partially accepted /rejected by the Bank, are examined by the IO so that escalation of grievances to Banking Ombudsman (BO) are minimized.
- 3. The IO shall be the focal point for Internal Grievance Redressal System in terms of Damodaran Committee recommendations on customer service in Banks.
- 4. To enhance the customer confidence in the Bank's systems and to hasten the process of grievance redressal, making it more transparent.
- 5. To enable customer grievances to be considered independently by an independent body/person, instead of Reserve Bank of India, Banking Ombudsman (BO).
- 6. The presence of IO at the apex level of Grievance Redressal Mechanism of the Bank will help enhancing the impartiality of the mechanism, as the grievance resolution would have an independent view point as a precursor to the BO.

# ESCALATION MATRIX OF GRIEVANCES TO GRIEVANCE HANDLING INCLUDING INTERNAL OMBUDSMAN (IO)

The grievance escalation matrix of the Bank is as follows:-

The customer can approach Bank officials from LEVEL I TO LEVEL IV either directly and/or if not satisfied with the resolution of complaint at any level.

### a) <u>LEVEL I – Branch Manager</u>



### b) LEVEL II - Regional office

### c) **LEVEL III – Zonal Office**

### d) LEVEL IV – PNO/General Manager, PDOD, Central Office

### **CMS Escalation Matrix**

For escalation of Complaints in the CMS portal following mechanism shall be put in place:

- Complaint attended by branch & partly accepted/fully rejected, R.O. Officials to check and decide.
- If R.O. Officials decide to fully accept the complaint, to advise Branch to resolve the complaint. Decision to be taken in consultation with Regional head.
- If R.O. officials agree with Branch decision on part/full rejection of complaint, Z.O. official to attend the complaint & take decision. However, such decision of R.O. must have concurrence of Regional Head.
- If Z.O. officials decide to accept the complaint in full, to advise R.O. to resolve the complaint. Such decision to be taken in consultation with Z. H.
- If Z.O. official decides to agree with R.O. decision in part/full rejection
  of complaint, concerned deptt. at Central office to attend the complaint
  & take decision. However such decision at Z.O. must have concurrence
  of Z.H.



- If department at C.O. decides to accept the complaint in full, decision to be conveyed to Z.O. with direction to resolve the complaint. Decision at C.O. to be taken in consultation with Department Head.
- However, if department at C.O. agree with Z.O. decision on part/full rejection of complaint, complaint shall be escalated to I.O. for his views.
   Such decision at C.O. Deptt. must have concurrence of Department Head.
- I.O. will give views on the complaint to the concerned deptt.
- If Deptt. agrees with view of I.O., will convey decision to Z.O. for resolution of complaint as per views of I.O.
- If department disagrees with view of I.O., formal approval of competent authority i.e. ED In charge of Customer Services to be obtained & then finally reject the complaint.

### **Procedural Guidelines**

# Procedure for Complaint Redress by Internal Ombudsman

- (1) The Bank shall formulate a Standard Operating Procedure (SOP) approved by the Committee of the Board handling Customer Service and Protection and establish a fully automated Complaints Management Software wherein all complaints that are partly or wholly rejected by the Bank's internal grievance redress mechanism are auto-escalated to the Internal Ombudsman within 20 days of receipt, for a final decision.
- (2) The Internal Ombudsman and Bank shall ensure that the final decision is communicated to the complainant within a period of 30 days from the date of



receipt of complaint by the Bank.

- (3) The Bank shall provide read-only access to their Complaint Management Software so that all complaints are accessible to the Internal Ombudsman who shall follow up cases of delayed escalation with the concerned department in the Bank. The Bank shall also provide access to the Internal Ombudsman in its Complaint Management Software, for adding his / her decisions on complaints escalated to the Internal Ombudsman.
- (4) The Internal Ombudsman shall also have 'read-only' access to the Reserve Bank's Complaints Management System to enable the Internal Ombudsman to keep track of (i) the cases forwarded by the RBI Ombudsman to the Bank, (ii) decisions of the RBI Ombudsman thereon, and (iii) where applicable, the decision of the Appellate Authority, under the Reserve Bank Integrated Ombudsman Scheme. Once the Internal Ombudsman has joined the Bank, the Bank shall seek read-only access for the Internal Ombudsman from the Consumer Education and Protection Department of the Reserve Bank.
- (5) The Bank shall furnish all records / documents sought by the Internal Ombudsman to enable him / her to redress / resolve customer grievances expeditiously.
- (6) The decision of Internal Ombudsman shall be binding on the Bank, except in cases where the Bank has obtained approval for disagreeing with such decision as stated in sub-clause (8) below.
- (7) Where the Internal Ombudsman upholds the decision of the Bank to reject or partly reject the complaint, the reply to the complainant should explicitly state the fact that the complaint has been examined by the Internal Ombudsman and for the reasons stated in the reply, the decision of the Bank has been upheld.
- (8) Where the Internal Ombudsman overrules the decision of the Bank to rejector partly reject the complaint, the Bank can disagree with the decision of the Internal Ombudsman only with the approval of the Competent Authority as defined in Clause 3 (1)(c) of the Directions of RBI. In such cases, the reply to the complainant shall explicitly state the fact that the complaint was examined



by the Internal Ombudsman and the decision of the Bank was overruled by the Internal Ombudsman in favour of the complainant; however, the Bank, with the approval of the Competent Authority, has disagreed with the decision of the Internal Ombudsman. Such decision must be communicated to the complainant within 7 days of communication of the decision of the Internal Ombudsman on the case to the Bank. All such cases shall be subsequently reviewed on a quarterly basis by the Customer Service Committee of the Board or the Board of the Bank as indicated under clause 12(1) of the Directions of RBI.

- (9) For complaints that are fully or partly rejected even after examination by the Internal Ombudsman, the Bank shall necessarily advise the complainant, as part of the reply, that he/she can approach the RBI Ombudsman for redress (excluding complaints against Bank not covered under the RB-IOS, 2021) along with complete details of the complaint. The Bank in its reply shall mention physical address of the Centralised Receipt and Processing Centre2, as well as the address of Reserve Bank's Complaint Management System portal for online filing of customer complaints (https://cms.rbi.org.in).
- (10) The decision of the Internal Ombudsman shall be mandatorily included in the information submitted by the Bank to the RBI Ombudsman, while furnishing documents related to the complaints received in the Office of the RBI Ombudsman.
- (11) In cases where the complainant has approached the RBI Ombudsman before the Internal Ombudsman has examined the complaint, the Bank should obtain the view of Internal Ombudsman and include the Internal Ombudsman's views in its submissions to the RBI Ombudsman.
- (12) The Bank shall use the analysis of complaints handled by Internal



Ombudsman in their training programmes / conferences to raise awareness about the pattern of complaints including the root causes, remedial measures, etc., among the frontline staff, in order to evolve consistency in handling of complaints. The Internal Ombudsman may also be involved for such trainings, where necessary.

- (13) While assessing the performance of the Internal Ombudsman, in addition to the level of pendency and work done by the Internal Ombudsman towards developing uniformity across the Bank in the redress of complaints, the Bank shall also analyse the number of cases where there is substantive difference between the decisions of the Internal Ombudsman vis-à-vis those given by the RBI Ombudsman subsequently.
- (14) The Bank shall widely disseminate the guidelines / instructions regarding these Directions among their staff while communicating the appointment of Internal Ombudsman in the organization (all branches and administrative offices).
- (15) The Bank shall not provide the contact details of the Internal Ombudsman in the public domain as the Internal Ombudsman shall not handle complaints received directly from the customers.

All related statutory guidelines/circulars issued by RBI/GOI are incorporated in the policy.

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Annexure

Report to Consumer Education and Protection Department, Reserve Bank of India Office of Internal Ombudsman (IO), Name of the Bank:

Part A: Quarterly Reporting (For all regulated entities including Credit InformationCompanies)

**Table I - Information pertaining to Internal Grievance Redress (IGR)** 

Number of	Number of	Number of	Number of	Number
Complaints	Complaints	complaints under	complaints	
received by the	processed by the	(B) that are rejected	falling under	
Regulated Entity	Regulated	(Partly or Wholly)	the domain of	
during the	Entity during	by RE	IO under (C)	
quarter	the quarter			
(A)	(B)	(C)	(D)	(E)

Reasons for difference between (D) and (E) – case-wise

**Table II - Information pertaining to Alternate Grievance Redress (AGR)** 

Number	of times	Number of cases not	Number of times	Number of Root	Number of
RBIO	/	referred to IO earlier	AA had advised the	Cause	suggestions
	$AA^{@}$	but referred to IO after	regulated entity to	Analysis	of the IO
sought	IO	information sought by	refer the decision of	(RCA) put up	accepted by

comments	RBIO / AA	the AAto the Board	by the Officeof	the Board
		/ IO	the IO to the	
			Board	

@ RBIO – Reserve Bank of India Ombudsman and AA – Appellate Authority as per Reserve Bank –

Integrated Ombudsman Scheme, 2021

- a. Major findings from the RCA
- b. Details of suggestions made by the IO and accepted by the Board

Table III - Subjective assessment (For all regulated entities including CICs)

Details of analysis and inputs on the pattern of:

(i) Complaints received against the RE, such as entity wise (for CICs), product- wise, category-wise, consumer group-wise, geographical location-wise, any other.

Top 3 Products against complaints were received:

Product Name (eg. Credit	Number of complaints	RCA done (Yes / No)
cards)	received	

Top 3 Consumer groups from where complaints were received:

Consumer group Name	Number of complaints	RCA done (Yes / No)
(eg. Pensioners,	received	
Proprietary firms)		

Top 3 Geographical locations from where complaints were received:

Geographical locations	Number of complaints	RCA done (Yes / No)
(eg State name –	received	
Kerala, Odisha or West		
Bengal)		

### For CICs only:

Top five REs against which complaints were received

RE name	Number of complaints	RCA done (Yes / No)
	received	

Any other:	 	
1.		
2.		

(ii) Complaints received in respect of REs not under the RB-IOS, 2021 (for CICs)

RE name	Number of complaints	RCA done (Yes / No)
	received	

Part-B: Annual Reporting (For ll regulated entities)Report for year ended

### Table - I

Number	Number	Number o	Number of	Numbe	er of IO	decisions	yet to be
О	of	rejected*	decisions of	implen	implemented by bank		
complaints	complaints		the	1	2	3	More
Closed	where		I	Month	Months	Months	than
b	decision		0				
·IO	of the		implemente				3
	RE was not		d by the RE				Months
	upheld						
	by the IO						
· c	o complaints losed b	o of complaints where decision O of the RE was not upheld	o of rejected* complaints losed where b decision O of the RE was not upheld	o of rejected* decisions of the complaints where decision O of the RE was not upheld decisions of the	o of rejected* decisions of implementation of the RE was not upheld decisions of implementation of the rejected* decisions of the	o of rejected* decisions of implemented by the complaints where decision O of the RE was not upheld decisions of the complaints of the decision of the RE was not upheld decisions of the decisions of the limplemente decisions of the limplemented by the RE limplemented	o of rejected* decisions of implemented by bank the Tomplaints where decision O of the RE was not upheld rejected* decisions of implemented by bank the Tomplemented by ban

<sup>\*</sup>To be rejected only with prior approval of the Competent Authority



### Table – II

Number of	Number of	Out of Number of	Number of
complaints that	complaints under	complaints under A,	complaints where the
should have been	(A) referred by the	Number of	complainants were not
referred by the	regulated entity to	complaints not	responded to within
regulated entity to	the IO during the	referred to IO within	one month of the date of
the IO during the	year	twenty days	filing the complaint
year (as per the			
Directions)			
(A)	(B)	(C)	(D)

Major reasons that complaints are not referred to the IO:

- 1.
- 2.