

## **Export Credit Guarantee Corporation of India Ltd**

### **CUSTOMER GRIEVANCE REDRESSAL POLICY**

**[Pursuant to 384<sup>th</sup> Meeting of Board of Directors dated 8<sup>th</sup> February, 2013 Agenda No: A-15]**

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.

#### **Objectives:**

2. 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" (I R D A provided)**

3. 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**

4. The company shall have four tiers Grievance redressal machinery with designated Grievance Officer at each level viz.
  - Branch Manager is the Branch level Grievance Officer,
  - Regional Manager is the Regional level Grievance Officer
  - General Manager (Grievances) is the Head Office level Grievance Officer

The principal function of Branch level Grievance Officer would be to redress the Grievance complaints received by the Branch. It is expected that the Grievance Officers 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 Corporate Customer Care Division 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.

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

5. ACGC is 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.
  6. 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.
  7. The designated Grievance Officers shall be –
    - The Branch Manager at every BO;
    - The Regional Manager at every RO; and
    - The General Manager at HO
- (a) 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 1st 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, and for grievances arising from original acts of GM, by the Executive Director.
- (b) As regards grievances originating from original acts of ED, CMD and Head Office Claims Committee (HCC), the designated authority for grievance redressal shall be the Apex Customer Grievance Committee (ACGC)
- (c) Composition: 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 ACGC 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)].
- (d) Delegation of Power: ACGC may exercise 'original' powers for grievance redressal with regard to grievances arising from act of commission/ omission by ED, CMD and the empowered Committees like HCC, HUC, etc.

**8.** Thus, the Grievance redressal mechanism is as follows:

Decision making Authority	1st stage	2nd Stage	3 <sup>rd</sup> Stage	Final Disposal
Officer below BM	Branch Manager	Regional Manager	General Manager	ACGC
Decision of BM	Regional Manager	General Manager	Executive Director	ACGC
Original act of RM	General Manager	Executive Director	Chairman cum Managing Director	ACGC
Original acts of GM	Executive Director	Chairman cum Managing Director	-	ACGC
Original acts of Executive Director / Chairman cum Managing Director / Head Office Claims Committee				ACGC

**Grievance Redressal System and Procedures:**

**9.** 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.

**10.** 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.

**11.** 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.

**Closure of Grievance:**

**12.** 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:**

**13.** Suitable Online based system for registration and tracking the status of grievances is in place. Policyholder may register their complaint online in the Corporation's grievance module (<http://119.226.14.43/ecgc/grievance/login.aspx>) which in turn is linked to IRDA's Integrated Grievance Management System (IGMS). After the registration of the complaint, the concerned Grievance Officer shall make the updation in the IGMS site.

### **Exclusions:**

**14.** 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) Complaints of corruption. This should be lodged with the vigilance officer of the Corporation and dealt with separately.

### **Customer Interaction and Focus**

**15.** 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.

**16.** 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**

**17.** The Grievance Redressal Policy of the Corporation adopted by Board of Directors is available on our website. ([www.ecgc.in](http://www.ecgc.in) -> Customer Care -> Grievance Redressal -> Grievance Redressal Policy) 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 is mandatory.

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