

POLICY ON GRIEVANCE REDRESSAL – 2022-23		
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1. INTRODUCTION:

In the present scenario of competitive banking, excellence in customer service is the most important tool for sustained business growth. Customer complaints are part of the business life of any corporate entity. This is more so for banks, because banks are service organizations. As a service organization, customer service and customer satisfaction should be the prime concern of any bank. The bank believes that providing prompt and efficient service is essential not only to attract new customers, but also to retain the existing customer base. This policy document aims at minimizing instances of customer complaints and grievances through proper service delivery and review mechanism and to ensure prompt redressal of customer complaints and grievances. The review mechanism should help in identifying shortcomings in product features and service delivery. Customer dissatisfaction would spoil bank's name and image. The bank's policy on grievance redressal follows the under noted principles:

- Customers are treated fairly at all times.
- Complaints raised by the customers are dealt with courtesy and on time.
- Customers are fully informed of avenues to escalate their complaints/grievances within the organization and their rights to alternative remedy, if they are not fully satisfied with the response of the bank to their complaints.
- Bank will treat all complaints efficiently and fairly as they can damage the bank's reputation and business if handled otherwise.
- The bank employees must work in good faith and without prejudice to the interests of the customer.

The policy document would be made available at all the branches. The Complaint handling process and procedure is of general nature. It should therefore be made known to all the employees to ensure better customer service and general awareness in the bank / branch.

The Customer complaint arises due to :

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

The customer is having full right to register his complaint if he is not satisfied with the services provided by the bank. He can give his complaint in writing, orally or over telephone. If customer's complaint is not resolved within given time or if he is not satisfied with the solution provided by the bank, he can approach Banking Ombudsman with his complaint or other legal avenue available for grievance redressal.

2. DEALING WITH COMPLAINTS:

2.1 COMPLAINTS/SUGGESTIONS BOX

Complaints/suggestions box is provided at each branch of the Bank. Further, at every branch a notice requesting the customers to meet the branch manager is displayed regarding grievances, if the grievances remain un-redressed.

2.2 COMPLAINT BOOK/REGISTER:

Complaint book in IBA format with perforated copies in each set is introduced and so designed as to instantly provide an acknowledgement to the customers and intimation to the controlling office with the remark of the Branch Head within a time frame.

All branches will maintain a separate complaints register in the prescribed format given for entering all the complaints/grievances received by them directly or through RO/Head Office/Govt. These registers should be maintained irrespective of the fact whether a complaint is received or not in the past.

The complaints registers maintained by branches should be scrutinized by the concerned Regional Head during his periodical visit to the branches and his observations/comments recorded in the relative visit reports. Branches may adopt the aforesaid format and generate copies electronically.

2.3 ONLINE COMPLAINT

Further, a link 'complaint' along with the name of the nodal officer for complaint redressal, is provided in the homepage of the Bank's website to facilitate complaint submission by customers. The link indicates that the first point for redressal of complaints is the bank itself and that complainants may approach the Banking Ombudsman only if the complaint is not resolved at the bank level within a month. Similar information is displayed in the boards put up in the bank branches to indicate the name and address of the Banking Ombudsman. In addition, the name, address and telephone numbers of the controlling authority of the Bank (Nodal Officer) to whom complaints can be addressed is also given prominently.

2.4 ANALYSIS AND DISCLOSURE OF COMPLAINTS - DISCLOSURE OF COMPLAINTS/ UN-IMPLEMENTED AWARDS OF BANKING OMBUDSMAN ALONG WITH FINANCIAL RESULTS

Bank places a statement of complaints before the Board/Customer Service Committee along with an analysis of the complaints received. The complaints are analyzed

- a. To identify customer service areas in which the complaints are frequently received,
- b. To identify frequent sources of complaint,
- c. To identify systemic deficiencies and
- d. For initiating appropriate action, to make the grievance redressal mechanism more effective.

Bank also shall disclose the following brief details along with the financial results:

Summary Information on Complaints Received by the Bank from Customers and from the OBOs				
Sl. No.		Particulars	Previous Year	Current Year
		Complaints received by the bank from its customers		
1		Number of complaints pending at the 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					

Note: The Master list for identifying the grounds of complaints is provided in Appendix - 1

Appendix - 1

Strengthening of Grievance Redress Mechanism in Banks	
Master list of grounds of complaints to be used for disclosure on the top five ground-wise receipt of complaints by banks under Para 4 of the Annex	
1	ATM/Debit Cards
2	Credit Cards
3	Internet/Mobile/Electronic Banking
4	Account opening/difficulty in operation of accounts
5	Mis-selling/Para Banking
6	Recovery Agents/Direct Sales Agents
7	Pension and facilities for senior citizens/differently abled.
8	Loans and advances
9	Levy of charges without prior notice/excessive charges/foreclosure charges

10	Cheques/drafts/bills
11	Non-observance of Fair Practices Code
12	Exchange of coins, issuance/acceptance of small denomination notes and coins
13	Bank Guarantees/Letter of Credit and documentary credits
14	Staff Behaviour
15	Facilities for customers visiting the branch/adherence to prescribed working hours by the branch etc.
16	Others

Further, Bank shall also place a detailed statement of complaints and its analysis on the Bank's website for information of the general public at the end of each financial year.

2.5 GRIEVANCE REDRESSAL MECHANISM

Bank shall ensure a suitable mechanism for receiving and addressing complaints from its customers/constituents with specific emphasis on resolving such complaints fairly and expeditiously regardless of source of the complaints.

Bank has already provided an Online Customer Grievance Redressal Mechanism in its website to enable customers, to lodge complaints, including Debit card, Prepaid Instrument [PPI] related transactions, In ODR [Online dispute redressal] RBI has advised for facility for tracking the complaint online and we have provided the said facility and receive response from the Bank, online.

Bank also shall:

- Ensure that the complaint register is kept at prominent place in the branches, which would make it possible for the customers to enter their complaints.
- Have a system of acknowledging the complaints, where the complaints are received through letters/forms.
- Fix a time frame for resolving the complaints received at different levels.
- Ensure that redressal of complaints emanating from rural areas and those relating to financial assistance to Priority Sector and Government's Poverty Alleviation Programmes also form a part of the above process.
- Prominently display at the branches, the names of the officials who can be contacted for redressal of complaints, together with their direct telephone number, fax number, complete address (not Post Box No.) and e-mail address etc., for proper and timely contact by the customers and for enhancing the effectiveness of the redressal machinery.

- Ensure that complaints received through e-mail are redressed through e-mail only.
- Ensure that complaints on alleged bribery are investigated by officials from the Vigilance Department, Head Office.

Further, as stated above in Para 2.4, Bank shall disclose brief details regarding the number of complaints, along with the financial results. This statement will include all the complaints received at the Head Office/ Regional Office level and also the complaints received at the branch level. However, if the complaints are redressed within the next working day, bank will not include the same in the Statement of Complaints. This is expected to serve as an incentive to the bank and the branches to redress the complaints within the next working day.

Where the complaints are not redressed within one month, the concerned branch has to forward a copy of the same to the concerned Regional Head under the Banking Ombudsman Scheme and keep him updated regarding the status of the complaint. This would enable the Regional Head to deal with any reference received from the Banking Ombudsman regarding the complaint more effectively. Further, it is also necessary that the customer is made aware of his rights to approach the concerned Banking Ombudsman in case he is not satisfied with the Bank's response. As such, in the final letter sent to the customer regarding redressal of the complaint, bank will indicate that the complainant can also approach the concerned Banking Ombudsman. The details of the concerned Banking Ombudsman will be included in the letter.

2.6 REVIEW OF GRIEVANCES REDRESSAL MACHINERY:

Bank will critically examine on an on-going basis as to how Grievance Redressal Machinery is working and whether the same has been found to be effective in achieving improvement in customer service in different areas.

Bank will identify areas in which the number of complaints is large or on the increase and consider constituting special squads to look into complaints on the spot in branches against which there are frequent complaints.

Bank may consider shifting the managers/officers of branches having large number of complaints to other branches/regional offices/departments at Head Office where contact with public may be relatively infrequent.

In cases where the contention of the complainant has not been accepted, a complete reply is given to him to the extent possible.

Grievances/complaints relating to congestion in the banking premises is examined by the bank's internal inspectors/auditors on a continuing basis and action taken for augmentation of space, whenever necessary, keeping in view the availability of larger accommodation in the same locality at a reasonable rent and other commercial considerations.

3. INTERNAL MACHINERY TO HANDLE CUSTOMER COMPLAINTS / GRIEVANCES:

3.1 STAKEHOLDERS & CUSTOMER RELATIONS COMMITTEE OF THE BOARD:

The committee would formulate 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 the annual survey of depositor satisfaction. The Board would also examine any other issues having a bearing on the quality of customer service rendered & review the functioning of Standing Committee on Customer Service.

3.2 STANDING COMMITTEE ON CUSTOMER SERVICE:

The Standing Committee on Customer Service will be chaired by the Managing Director of the bank. Besides Chief Business Officer, General Manager, three senior executives of the bank, the committee would also have two or three eminent persons drawn from the public as members. The committee would have the following functions.

- Evaluate feed-back on quality of customer service received from various quarters. The committee would also review comments/feed-back on customer service and implementation of commitments contained in the Code of Bank's Commitments to Customers adopted by the Bank.
- The Committee would be responsible to ensure that all regulatory instructions regarding customer service are followed by the bank. Towards this, the committee would obtain necessary feed-back from regional heads / functional heads.
- The Committee also would consider unresolved complaints/grievances referred to it by functional heads responsible for redressal and offer its advice.
- The Committee would submit report on its performance to the Stakeholder & Customer Relations Committee of the Board at regular intervals.

3.3 PERIODICITY OF MEETINGS:

Bank will conduct a meeting of “Stakeholder & Customer Relations Committee of the Board” on quarterly basis and “Standing Committee on Customer Service” twice a year. Bank will ensure that these high level meetings are conducted on time.

3.4 BRANCH LEVEL CUSTOMER SERVICE COMMITTEE:

Branches conduct “Customer Service Committee meetings” on a monthly basis to study complaints/suggestions, etc from the customers. The purpose is to evolve ways and means of improving customer service. Two non official members are also invited for the meeting, of which one is a senior citizen.

3.5 CUSTOMER SERVICE & GRIEVANCE REDRESSAL CELL:

A dedicated Customer Service & Grievance Redressal Cell under the Branch Banking & Digital Channels Department will attend to matters/issues relating to Customer Grievance or Service and take steps for improving the quality of customer service and speedy redressal of customers’ grievances.

3.6 NODAL OFFICER AND OTHER DESIGNATED OFFICIALS TO HANDLE COMPLAINTS AND GRIEVANCES:

The Assistant General Manager, Branch Banking & Digital Channels Department is designated as Nodal Officer who will look after the implementation of customer service and complaint handling for the entire bank. The bank may also appoint /designate Quality Assurance Officer at Regional offices to handle complaints / grievances in respect of branches falling under their control.

3.7 MANDATORY DISPLAY REQUIREMENTS:

Every branch of the bank is provided with information as to:

- Appropriate arrangements for receiving complaints and suggestions.
- The name, address and contact number of Nodal Officer.
- Contact details of Banking Ombudsman of the area.
- Code of bank’s commitments to customer/Fair Practice code.

3.8 RESOLUTION OF GRIEVANCES:

Branch Head is responsible for the resolution of complaints/grievances in respect of customer’s 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

should be resolved completely to the customer's satisfaction. When an issue remains unresolved after expiry of the stipulated period and if the customer is not satisfied, then he should be provided with alternate avenues to escalate the issue. If the Branch Head feels that it is not possible at his level to solve the problem he can refer the case to Regional Office for guidance. Similarly, if Regional Office finds that they are not able to solve the problem, such cases may be referred to Head Office.

3.9 STANDARD OPERATING PROCEDURE (TIME FRAME) FOR RESOLUTION OF COMPLAINTS:

Complaint has to be seen in the right perspective because they indirectly reveal a weak spot in the working of the bank. Complaint received should be analyzed from all possible angles.

3.9.1 Escalation matrix for customer complaints:

The complaints should be resolved / redressed within a maximum period of 30 days. The complaints resolution/escalation matrix describes the time period to be escalated to higher authorities if not resolved within the time stipulated at various levels.

Sl No.	Level	Days for redressal [T + Calendar Days]
1.	Branch	7 days
2.	Regional Office	15 days
3.	Head Office	30 days

- a. **Branch Level:** The first level of complaint resolution is at Branch level. Complaints received at Branch level should be resolved within 7 days. If not resolved then branch has to refer the complaint to their respective Regional Office for resolution.
- b. **Regional Office Level:** Complaints received from branch should be resolved within 15 days from day 1. If the customer is not satisfied by the reply he can approach Head Office.
- c. **Head Office Level:** Such complaints received at Head Office should be resolved/redressed 30 days from day 1.

All complaints which are partially/wholly rejected by Bank's internal grievance redressal mechanism are to be internally escalated to the Internal Ombudsman for final decision.

Even after one month if the complainant is not satisfied with the Banks reply, he may approach Banking Ombudsman appointed by Reserve Bank of India or other legal avenues available for grievance redressal.

The facilities to lodge the complaints through online mode have been made available in Bank's corporate website under the link 'Complaint'.

3.9.2 Further, the timelines for resolution of complaints with respect to defective transactions like ATM defective cash withdrawal, IMPS/UPI, debit card online payment, POS etc., are as per the RBI guidelines, are given here under:

Particulars	Time Frame [T + Calendar Days]
ATM defective transaction	T + 5 days
Card to Card Transfer	T + 1 Day
Point of Sale (PoS) (Card Present) including Cash at PoS	T + 5 Days
Card Not present (CNP) (e-commerce)	T + 5 Days
Immediate Payment System (IMPS)	T + 1 Day
UPI (Transfer of funds)	T + 1 Day
UPI (Payment to merchant)	T + 5 Days
Aadhaar Enabled Payment System (AEPS) (Including Aadhaar Pay)	T + 5 Days
Aadhaar Payment Bridge System (ABPS)	T + 1 Day
National Automated Clearing House (NACH)	T + Day
Prepaid Payment Instruments (PPIs) – Cards/Wallets	
a. Off-Us transaction: The transaction will ride on UPI, card network, IMPS, etc., as the case may be. The TAT and compensation rule of respective system shall apply.	
b. On-Us transaction: T + 1 Day	

3.9.3: Contact Centre details:

Email id: ccc@ktkbank.com

Toll free number: 1800-572-8031/1800-425-1444

3.10 INTERACTION WITH CUSTOMERS:

The bank recognizes that customers' expectation/requirement/ grievances can be better appreciated through personal interaction with customers by bank's staff. Structured customer meets, say once 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 valuable input for revising its product and services to meet customers' requirements.

3.11 SENSITIZING OPERATING STAFF ON HANDLING COMPLAINTS:

Staff should be properly trained for handling complaints. Bank is dealing with people and hence difference of opinion in areas of friction can arise. With an open mind and a smile on the face, Bank should be able to win the customers' confidence.

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 the HR& IR Department.

3.12 INTERNAL OMBUDSMAN:

As per the Reserve Bank of India guidelines, Internal Ombudsman scheme was introduced in our Bank with effect from 01.03.2019 so that 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 forum for redressal.

Further RBI informed in their letter no. CEPD CO.PRS.cir No.01/13.01.009-2018-19 dated September 03, 2018, Internal Ombudsman shall not handle complaints received directly from the customers or members of public. However, as per the Internal Ombudsman scheme guidelines, complaints that are partly or wholly rejected by the bank's internal grievance redressal mechanism are to be internally escalated to the Internal Ombudsman for final decision.

3.13 POLICY REVIEW AND REVISION

This policy will be reviewed annually and is subject to revision based on the extant guidelines of RBI from time to time.
