



# Technology Framework for Grievance Redressal Mechanism (GRM) for Business Correspondents



# Table of Contents

---

Foreword	5
Acknowledgement	6
1. Introduction & Background	7
2. Key Objectives of GRM Framework	7
3. Design principles of GRM	8
4. Categorization of GRM	9
5. Individual CBC Specific GRM	10
<hr/>	
5.1. Individual GRM System	10
5.1.1. Individual GRM Architecture	11
5.1.2. Individualized GRM- Process	13
<hr/>	
5.2. Centralized GRM System	13
<hr/>	
6. GRM Framework	14
<hr/>	
6.1. Scope of GRM Framework	14
6.1.1. Role of Customer	14
6.1.2. Role of Agent	15
<hr/>	
6.2. Key Objectives	15
6.3. Key Functions	16
6.4. GRM Framework: Functional Architecture	16
6.4.1. Stakeholders and systems in the GRM process	19
6.4.2. GRM Process flow diagram	23
6.4.3. Detailed GRM Process	25
<hr/>	
6.5. GRM Framework: Technical Architecture	33
6.5.1. Features of GRM Portal	33
6.5.2. Accessibility of portal	34
6.5.3. Key Benefits of Reporting and Tracking of Grievances	35
<hr/>	
6.6. GRM Components	35
6.6.1. Grievance Identification	35
6.6.2. Grievance Acceptance Channels	36
6.6.3. Real time tracking and monitoring	37
<hr/>	
6.7. Stakeholders and their responsibilities	42
6.8. Escalation Mechanism	44
6.8.1. Automatic escalation to BCFI from the portal	44
6.8.2. Manual escalation to BCFI from customers and ABCs	44
<hr/>	
6.9. Reporting to RBI and banks (specific to their complaints)	45
<hr/>	
7. GRM Technology Framework	45
<hr/>	
7.1. Information Dissemination/Rendering Services	47
7.2. IT Infrastructure Services	47
7.3. System Management Services	47

7.4.	Business Applications and Services	48
7.5.	Application Design/Integration Services	48
7.6.	Business Intelligence Services	49
7.7.	Proposed Technology Options	49
<hr/>		
8.	GRM management post implementation	50
<hr/>		
8.1.	Governance structure	50
8.2.	Support and maintenance	51
8.3.	Process review and updates	51
8.4.	Technology systems upgradation	51
<hr/>		
9.	Annexure	52
<hr/>		
9.1.	Awareness initiatives for GRM	52
9.2.	Oversight by government bodies and third parties	52
9.3.	Continuous improvement and changes in GRM processes and systems	53
9.3.1.	Introduction of quality standards	54
<hr/>		
9.4.	BCFIs role in GRM	54
9.4.1.	GRM governance structure	54
9.4.2.	Responsibilities of team in BCFI	54

# Abbreviations

Abbreviation	Description
<b>ABC</b>	Agent Business Correspondent
<b>CBC</b>	Corporate Business Correspondent
<b>DFS</b>	Department of Financial Services
<b>DTH</b>	Direct to Home
<b>GRM</b>	Grievance Redressal Mechanism
<b>IRDA</b>	Insurance Regulatory and Development Authority
<b>ISO</b>	International Organization for Standardization
<b>IVRS</b>	Interactive Voice Response System
<b>KM</b>	Knowledge Management
<b>NPCI</b>	National Payments Corporation of India
<b>OTP</b>	One Time Password
<b>PFRDA</b>	Pension Fund Regulatory and Development Authority
<b>PIN</b>	Personal Identification Number
<b>PMJDY</b>	Pradhan Mantri Jan Dhan Yojna
<b>RBI</b>	Reserve Bank of India
<b>RFP</b>	Request for Proposal
<b>SLA</b>	Service Level Agreement
<b>SRO</b>	Self-Regulatory Organization
<b>TSP</b>	Technology Service Provider
<b>UIDAI</b>	Unique Identification Authority of India

# ***Foreword***

BCFI was started with a vision to promote the highest standards in delivering financial services at the last mile. Past decade was a watershed period for financial inclusion in India with the largest number of adults having an opportunity to not only open bank accounts but also benefiting from it in many ways including seamless receipt of welfare cash transfers, remittances, microcredit and other inflows. Citizens were able to access these accounts easily through a large and growing network of business correspondent agents (BCAs) across the length and breadth of the country. BCFI acts as a platform for the collective voice of more than a million BCAs represented by 50+ Corporate Business Correspondents.

## **Some of the key initiatives taken by the federations include:**

Proactive policy advocacy to have the voice of BCAs heard by the policy makers.

1. Create an enabling environment for smooth functioning of BCs through appropriate interventions at various levels.
2. Provide a platform for sharing knowledge and ideas to build a formidable distribution network
3. Standardizing practices including customer protection principles, agent training and grievance redressal.

During Covid-19 crisis, the need for BCs has increased manifold as banking had to be made available closer to the citizens' doorsteps due to movement restrictions. BCFI has been very proactive in responding to members' concerns with respect to law and order, income protection of agents, life insurance and other benefits, cooperation from banks etc., and ensured all agents and field forces are able to serve the citizens without much interruption. Sadly, we could not save some of our Corona Warriors who succumbed to Covid-19. We will be ever indebted to them for their selfless services to the nation.

We look forward to continuing our service towards achieving universal financial inclusion through our members and their agent or sales networks. BCFI intends to assume a self-regulatory role soon to bring greater harmony and ensure highest service quality to customers.



***Sasidhar N. Thumuluri, Chairman,***

***BCFI***

# ***Acknowledgement***

We thank following for their active participation in development of BCFI's Grievance Redressal Mechanism (GRM):

1. Dr. Anand Shrivastav, Beam Money Pvt Ltd
2. Mr. Mahesh Jain, Integra Micro Systems Pvt Ltd
3. Mr, Girish Nair, World Bank/IFC
4. Ms, Poorna Bhattacharjee, World Bank/IFC
5. Ms, Farzana Bijur, World Bank/IFC
6. Ms, Meghna Raghunath, World Bank/IFC
7. Mr. Kuberan Selvaraj, World Bank/IFC
8. Mr. Ketan Doshi, Paypoint India Network Pvt Ltd
9. Mr. Rajeev Lal, Paypoint India Network Pvt Ltd
10. Mr. Mihir Mehta, Paypoint India Network Pvt Ltd
11. Ms. Alphina Jos, BWDA Finance Ltd
12. Mr. Mahesh Ramachandran, Commonwealth Inclusive Growth Foundation
13. Late Mr. Paresh Rajde, Suvidhaa Infoserve Pvt Ltd
14. Mr. Peter N Palaniswami, Nanayaturabhi Development Financial Services
15. Dr. B B Singh, Cashpor Micro Credit
16. Mr. Amit Jain, Fino Payments Bank
17. Mr. Ashutosh Shrivastav, Oxigen Services India Pvt Ltd
18. Mr. Anand Kapadia, Transerv Pvt Ltd
19. Mr. Abhishek Sinha, Eko India Financial Services Pvt Ltd
20. Mr. Abhinav Sinha, Eko India Financial Services Pvt Ltd
21. Mr. Gunjan Saxena, Eko India Financial Services Pvt Ltd
22. Mr. Akhilesh Akhil, Sanjivani Vikas Foundation
23. Mr. Nitin Nagpal, PwC
24. Mr. Amit Kumar Singh, PwC
25. Mr. Dharmender Jhamb, PwC
26. Mr. Ankit Kaushik, PwC

**Sunil Kulkarni**  
Chair, Standards Committee, BCFI

# ***1. Introduction & Background***

The objective of this document is to formulate a standardized, robust and effective Grievance Redressal Mechanism (GRM) for customers and Agent Business Correspondents (ABCs), and can be implemented across the entire Business Correspondent (BC) ecosystem. There is a scope for a standardized GRM across the BC ecosystems as different types of Corporate Business Correspondents (CBCs) exist in the ecosystem with different GRM, and some of the CBCs do not have a comprehensive and well defined GRM. A standardized GRM framework will help all stakeholders in the ecosystem as there will be greater clarity due to uniformity in the GRM processes, systems and implementation.

As a first phase of the previous stages of the assessment, face to face meetings were held with various kinds of CBC organizations. Further, the team made field visits to various districts to interview ABCs and understand the existing GRM processes on the ground level and the challenges faced by ABCs and customers. Key best practices identified from various CBCs and identified Indian and global industry sectors best practices in GRM were assessed for incorporation in the framework. These practices have been analyzed for relevance to the BC ecosystem in India and incorporated in the framework.

As a second part of the previous stages of the assessment, GRM regulatory best practices of RBI guidelines, regulations from other bodies such as Insurance Regulatory and Development Authority (IRDA) and Pension Fund Regulatory and Development Authority (PFRDA) were analyzed with relevance to the BC ecosystem in India and incorporated in the framework.

## ***2. Key Objectives of GRM Framework***

The framework has been designed with an approach to apply the framework across entire BC ecosystem and to provide standardization, robustness and effectiveness to the entire GRM process. The key objectives of the GRM framework are as follows:

- To define and map stakeholders to the GRM process along with their roles and responsibilities
- To define channels for registering grievances and escalating grievances
- To categorize various grievances faced by customers/ABCs and define of SLAs for resolution of those grievances
- To create framework for customers and ABCs for resolution of grievances
- To establish Escalation mechanism for various grievances and define turn-around time for resolution
- To establish Reporting mechanism for review by various stakeholders such as BCFI, Banks, RBI and other bodies
- To establish Technology framework for deployment of systems to support the GRM framework

### ***3. Design principles of GRM***

The GRM framework has been designed keeping into consideration various findings from the previous stages of assessments and the feedback from CBCs and ABCs has been incorporated. The Indian and Global best practices have also been identified and incorporated in the framework. The framework has been designed with consideration of various principles as described under:

- **Customer convenience:** Similar to other businesses, customer satisfaction is the bedrock of the sustenance of the BC model and the customer grievances must be given utmost priority. With inadequate convenience and service levels on addressing the customer grievances, it discourages customers to use the BC channel for banking operations. This further impacts the growth of BC ecosystem. With financial inclusion as an important driver of the BC model, it is imperative that customers and ABCs must have the easiest means available at their disposal for any of their grievances. Also, timely and effectively redressal of customer grievances increases the trust level of customer to use GRM channel for Banking, insurance, credit and pension related services. Level of financial literacy and awareness has been an important consideration to ensure that the framework is simplified to a great extent and yet be effective.
- **Technology:** The framework relies on technology backbone to deliver quick resolution of grievances with real time updates. Greater usage of technology will ensure that the grievance redressal process remains 'future proof' and agile with advances in regulations and customer's financial literacy & awareness levels.
- **Accountability:** With greater usage of technology, it will be easier to define and monitor accountability and performance as per adherence to the service levels of each step of grievance redressal process.
- **Cost effectiveness:** Keeping into consideration that the BC ecosystem faces a challenge of working in thin margins, processes are proposed to ensure minimum cost to the ecosystem vis-à-vis individual cost to each of the CBCs.
- **Adherence to regulations:** The framework has incorporated all the regulations relevant to the BC ecosystem to ensure that the processes are compliant with the regulatory requirements. Greater use of technology will also ensure that the system can be modified with evolution of the regulatory landscape.
- **Technology driven monitoring and reporting:** With technology as backbone of the GRM framework model, monitoring and compliance of the process are simplified and all the stakeholders can focus more on quality of resolution of grievances rather than on manual tracking the redressal and reporting. Regular monitoring will also ensure timely intervention by all stakeholders and adherence to the stipulated timelines.
- **Continuous improvement:** Greater usage of technology coupled with regular monitoring and reporting will ensure that that the model keeps on evolving as per future requirements. The GRM platform will be amenable to quick changes in process, SLAs, accountability and other factors.



## 4. Categorization of GRM

As identified in the previous phases of the assessment, there are various grievance related issues faced by both customers and ABCs and they need to be categorized as the resolution will be different. In addition, a clear segregation of grievances will also help understand systemic challenges faced in the BC ecosystem. The corresponding two categories of GRM are:

**Customer GRM:** Customer GRM covers all aspects that have a direct impact on customers and will act as a universal mechanism in the Indian BC ecosystem for addressing all customer grievances as per the defined systems and processes. It encompasses various issues faced by customers of different types of CBC organizations such as Pure Play BC, PPI BC, Retailer BC and MFI BC.

The need for a standardized and unified GRM arises due to existing disparities in the systems and processes followed by various CBC organizations. Having a unified customer GRM will help all the stakeholders develop clear understanding of the GRM systems and processes. Customers will also benefit as the same mechanism will be applicable for all CBCs irrespective of the type of services. The following categories will be applicable to customer GRM:

- **Inadequacy in the services provided by ABCs:** In cases where the services provided by ABCs have any deficiency in the outcome as per the requirement.
- **Delay in provision of services:** In cases where there is delay in providing services to customers as per the timelines.
- **Overcharging from the customers:** Customers are charged for services which are to be provided free of cost or charged more than the prescribed fees.
- **Any irregularities by ABC/CBC/Bank/third parties:** In case of any financial or other irregularity from ABC or CBC or Bank.
- **Any other grievance faced by the customer:** Any other grievances faced by the customers which do not fall in the aforementioned categories.

**ABC GRM:** Agent GRM is an equally important part of the GRM process as ABCs are the most important touchpoint for customers. However, clear demarcation has been created to separate customer grievances and agent grievances as separation of the two at the beginning is important for getting quick resolution. The agent GRM will be a unified and standardized mechanism for ABCs from various CBC organizations and the grievances will be forwarded to respective CBCs for resolution. A uniform system will ensure that all ABCs, irrespective of geography are able to receive adequate support as per the defined SLAs. The key elements to differentiate agent grievances from customer grievances are as under:

- **Failed transactions or delays in processes:** These grievances will be considered under customer grievances as the failure of transaction or delay in certain processes directly impacts the customer. Only cases where agents have done settlement on their own, such as providing cash despite non-transfer of funds to agent account after deduction from customer account, failed recharges for mobile/DTH but amount deducted from agent account etc. will be eligible under agent GRM.
- **Issues having direct impact on agent operations:** All issues that affect the ability of agent to provide quality services to customers as adequate resolution at the agent level will help prevent issues

trickling down to the customer level in many cases and address the root cause of grievances. Examples of such grievances include device malfunction, delays in receiving funds in agent account etc.

- **Issues having indirect impact on agent operations:** All issues, which indirectly affect the ability of agents to provide quality services to the customers such as delayed remuneration, inability to see transactions conducted by agents themselves etc. qualify under this category. These issues might not directly impact the daily operations, but could have impact on morale and commitment of the ABCs.
- **Any irregularities by Customers/CBCs/Banks/third parties:** ABCs will be able to report any suspicious activity or irregularity by any of the external entities including but not limited to customers, banks or CBCs.
- **Inadequate formal channels:** In cases where the lack of formal channels or processes between the CBC and third parties limit the ability of ABCs to provide quality services to the customers.

## ***5. Individual CBC Specific GRM***

For designing of GRM, two alternatives for implementation of a GRM frameworks are feasible: a centralized GRM system or an individual GRM system. Each of the alternatives has due advantages over the other which are comprehensively explained in subsequent section. Both types of systems have been illustrated in the subsequent sections. In line with the needs of the system and varying levels of maturity of different CBC organizations, it is proposed that CBCs may start with implementation of individual GRM systems. The option of having a centralized GRM can be explored in the future depending on the pace of maturity of the entire ecosystem. The implementation of individual GRM systems will also help in the future as the learnings from various CBCs can be incorporated in a centralized GRM system in the future. It must be noted that the proposed framework will also govern individual GRM systems, however, individual CBCs will have the flexibility of adding more features over and above the proposed framework to deliver greater value to their customers.

### ***5.1. Individual GRM System***

In an individual GRM system, each of the CBCs will implement and maintain GRM systems which are in accordance with the principles of the proposed GRM framework. Each of the CBCs will incur cost on their own for implementation and maintenance of GRM systems.

- **Ability to differentiate on the basis of GRM:** The CBCs will be able to differentiate their service offerings to customers by adding more services/utilities over and above the basic requirements as described in the framework.
- **Limited requirement of a central body to oversee GRM:** There will not be requirement of BCFI to manage various aspects of the GRM. The role of such an entity will be restricted to a strategic level and the operational control of the processes will be with the CBCs.
- **Reduced effort in integration:** Individual GRM systems will not require any changes/integration of the existing technology stack of the CBCs unlike the case of a central GRM wherein some integration will be required with a central GRM system.
- **Utilization of existing systems:** Some of the CBCs have existing systems that could be made compliant to the proposed framework after some changes to the technology and processes. Such CBCs would be able to leverage their existing systems instead of investing in new system.

Open GRM Architecture: In the previous section, although it has been proposed to implement individual GRM for the BC ecosystem. However, with due passage of time if any of the CBCs wishes to bring in enhancements/additional features to their GRM process there would be an option for them to build over the proposed individual GRM process and system. The Individual GRM will provide the basic functionalities as envisaged in the framework, with the CBCs having an option of including customizations, which are congruent with the proposed framework. Various aspects such cost, maintenance, regulatory approval etc. of the enhancements will be the responsibility of the CBCs.

### **5.1.1. Individual GRM Architecture**

There would exist two models of Individual GRMs, where in each of the models of individual GRMs, deployed at the respective CBC will share the performance information with the Central GRM through APIs. At the BCFI level, the system would aggregate all the necessary performance and grievance related data from the individual GRMs.

Details of the two models of integration are as below:

**1. Updated Legacy /homegrown individual GRMs:** This model would be used for those CBCs, which have their existing grievance handling mechanism processes and tools, with enriched features. The CBCs will be required to adhere their existing systems with GRM system guidelines. Additionally, such systems will be required to develop APIs for sharing information with BCFI for monitoring of overall grievance redressal ecosystem.

**2. Customized GRMs:** This model will be used for a segment of CBCs which do not have an existing GRM system in place, but have additional processes, guidelines, procedures, and governance structure and service levels. In this scenario, every CBC will required to design, develop and deploy system, adhering to the guidelines of the framework as specified in this document.

The architecture of the Individual GRM is as below:

# Individual GRM Processes

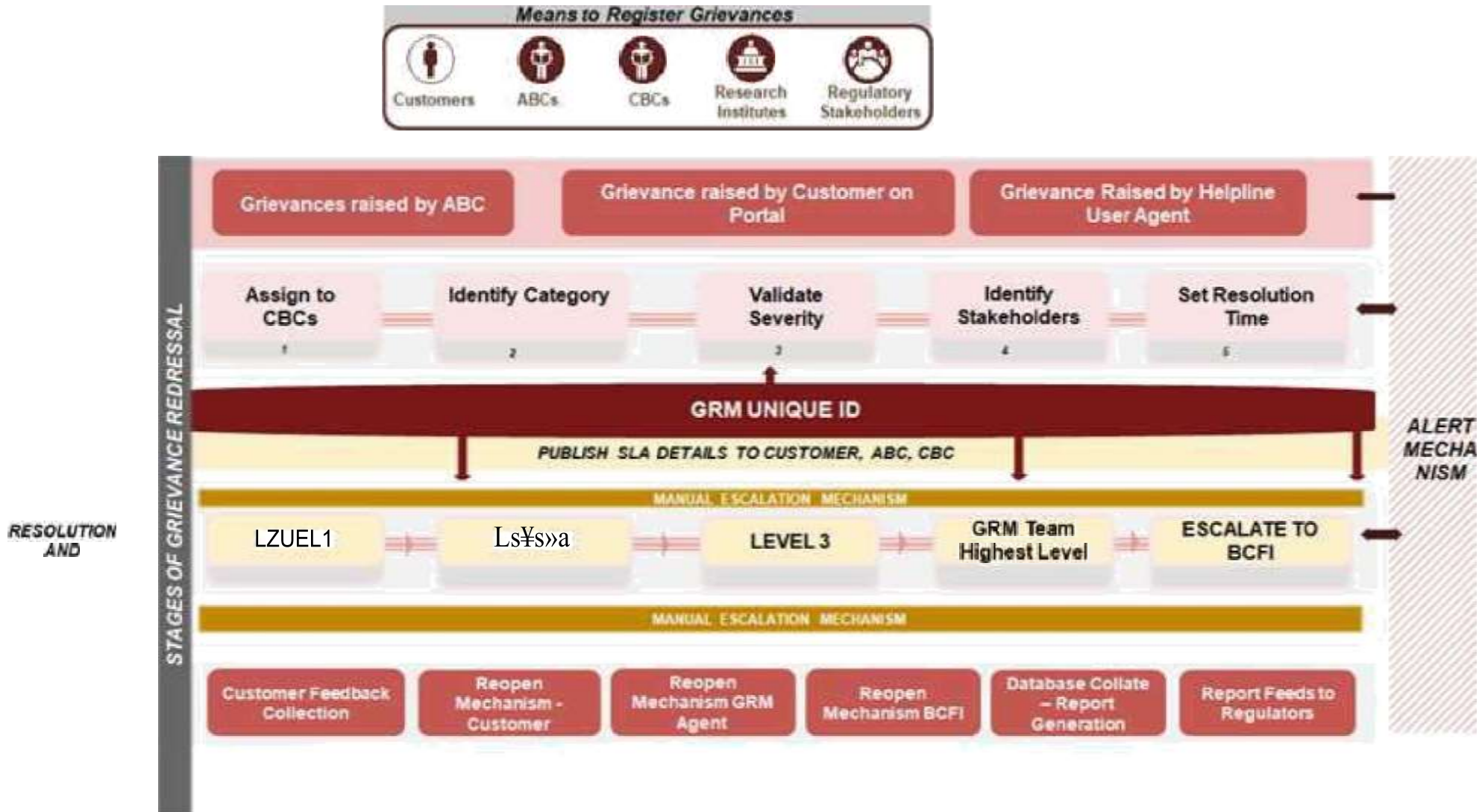


Figure 1: Individual GRM Architecture

## 5.1.2. Individualized GRM- Process

This section describes the processes for Individual GRM. The processes have been sub-divided into four major steps with respective changes required to be incorporated in existing individual GRM systems:

Process Step #	Description	Outcome	Change required in existing individual GRM
1	<b>Registration of grievance:</b> Registration of grievance on portal with complete details required as per the system.	Unique grievance ID	Mapping of grievance registration ID (individual GRM) with GRM
2	<b>Categorization of grievance:</b> Mapping of grievance to stakeholders as per business rule and estimation of resolution time.	Responsible stakeholder, resolution time	Mapping of categorization field, severity levels
3	<b>Resolution of grievance:</b> Resolution of grievance as per SLA and escalations if required, intimation to customer about the resolution.	Resolution confirmation to customer/ABC	APIs to update (including push alerts) resolution of grievance to the centralized monitoring dashboard / interface
4	<b>Closure of grievance:</b> Closure of grievance after giving opportunity to customer for reopening grievance.	Closure confirmation to customer/ABC	APIs for real time synchronization of Grievance status between individual GRM & central dashboard

## 5.2. Centralized GRM System

As part of this framework, it is proposed that individual GRM should be deployed by each CBC, in line with the guidelines and specifications mentioned in this document. In future, when all CBCs systems reach a desired level of maturity then a centralized cloud based infrastructure may be deployed. In a centralized GRM system, BCFI will manage the central system and all the CBCs will use the central system for all GRM related activities. The cost will be shared by all the CBCs for the implementation and maintenance of the central GRM system. The key benefits of having a centralized GRM system are discussed below.

**Merits of a centralized GRM:** The pros of having a centralized GRM are as under:

- **Reduced cost:** The cost will be lower due to shared cost and economies of scale
- **Easier implementation of changes in GRM process:** It will be easier to implement changes in the process/KPIs/mapping of stakeholders in central system as compared to an individual GRM system.
- **Greater clarity among stakeholders:** There will be greater clarity among all the stakeholders including customers as there will be only one central GRM.
- **Better communication and awareness:** A central GRM will help in better and efficient awareness campaign as more number of customers could be covered under various initiatives by having a central system.

- **Centralized reporting and monitoring:** The centralized reporting and monitoring activities will be simplified due to registration of grievances on a central platform thereby helping in checking compliance.

Depending upon the multiple functional factors in short term, near term and long term, it is observed that individual GRM is beneficial as a starting point as the leading CBCs can implement the same. In future, the collective learning and experience of both CBCs and BCFI can be leveraged to create a central GRM for the entire ecosystem depending on the maturity of all participants in the ecosystem.

i.

## 6. GRM Framework

GRM framework will be an integral part of BC services as the whole BC model is built to achieve the purpose of financial inclusion for all strata of society. GRM is designed to have a standardized framework across the entire BC ecosystem for providing quick resolution to customer grievances.

### 6.1. Scope of GRM Framework

There is a need for definition of scope of the GRM framework and it must be communicated to all the stakeholders to ensure that grievances relevant only to the BC ecosystem are registered under the provisions of this framework. The details of scope for customer and agent GRM are discussed in the subsequent sub-sections:

#### 6.1.1. Role of Customer

The scope of the customer GRM is limited to the Indian BC ecosystem and the applicability to different stakeholders is limited to the services offered by any of the CBCs. The details of applicability of the GRM framework for different entities is as under:

- **Customers:** Customers who avail any of the services offered by the any of the CBCs such as cash deposit, cash withdrawal etc. are covered under the customer GRM framework.
- **ABC:** ABCs are covered to the extent of services provided as a BC agent. Some of the ABCs also provide additional services as a part of alternate business, those are not covered under the framework.
- **CBC:** The services offered by CBCs relevant to the BC ecosystem will be covered in the framework. Some CBCs will also have lines of business which are not relevant to BC services, those services are not covered.
- **Banks:** The applicability of GRM framework to banks is limited to the banking services provided by ABCs/CBCs. The regular services offered by banks are not covered under this framework.
- **Insurance Regulatory Development Authority (IRDA), PFRDA and Third Parties:** Third parties such as Non-bank insurance companies, utility providers, and pension services providers will also be covered to the extent of services provided by them under the BC model.

#### Exclusions:

Services provided by the Banks, ABCs or CBCs that do not fall under the category of BC services are excluded from the framework. At the same time, customers cannot report grievances other than those corresponding to the BC services through the customer GRM framework.

### 6.1.2. Role of Agent

The scope of agent GRM is limited to the Indian BC ecosystem and the coverage of ABCs under the framework is limited to their employment or registration with any of the CBCs. The details of applicability of GRM for different entities is as under:

- **ABCs:** ABCs are covered under the framework to the extent of their association with the CBCs for providing services to end customers. Any other grievances specific to alternate businesses run by ABCs are not covered.
- **CBCs:** The services offered by CBCs relevant to the BC ecosystem are covered in the framework. In cases of ABCs providing services other than those relevant to the BC ecosystem will require to be addressed by the CBCs separately.
- **Banks:** The applicability of agent framework to banks will be limited to the services provided by ABCs to customers. Other services which are offered by ABCs on behalf of the bank such as account opening, pension schemes etc. are also covered in the framework.
- **Insurance Regulatory Development Authority (IRDA), PFRDA and Third Parties:** Third parties such as insurance companies, utility providers and pension services providers will also be covered for the services provided by ABCs on their behalf under the BC model.

**Exclusions:** Services provided by ABCs that are not relevant to the BC ecosystem are not covered. ABC issues specific to market dynamics such as remuneration, etc. are not covered in the framework. However, issues such as delayed remuneration, inability to see commission etc. specific to BC services will be a part of the framework as those services affect the ability of agent to provide adequate services to end customers.

### 6.2. Key Objectives

GRM framework has been developed after doing assessment of the existing GRM practices followed by different CBCs and their implementation at the ground level by ABCs which highlighted the problems faced by both ABCs and customers. Various best practices from different countries and industries have also been considered for developing the framework. It is imperative that the following objectives are met:

- Customers and agents receive regular updates on the entire GRM process through multiple modes of communication.
- Customers and agents are able to seamlessly register grievances on the portal through any of the channels.
- Stakeholders from CBC organizations are tagged in various stages of the process.
- Customers and agents receive real time information on the status of their grievances.
- Escalations are automatically triggered and sent to the concerned stakeholders as per the SLAs.
- Middle and senior management from organizations such as CBCs, BCFI, Banks, regulators, government bodies and third parties get periodic status updates on the grievances.

### 6.3. Key Functions

GRM is established to ensure that both customers and agents receive timely and adequate support for their grievances. The GRM portal will be designed to ensure key functions are executed for both customers and ABCs. The key functions for both customers and ABCs have been discussed in the subsequent sub-sections.

The GRM process will cover all the steps till the final resolution is provided to the customer or ABCs depending on the type of grievance. The framework will also be used for monitoring the entire process and sending timely reports to stakeholders. The key functions of GRM are as under:

- **Registration of grievances:** Provide facility for registration of grievances on the portal by customers themselves or through the ABCs by using the portal or helpline. For agent grievances, the agents will have the option to register grievances either through the portal or helpline. Third parties and government bodies such as department of financial services, state level bankers’ committees, local government bodies, etc. will also be able to register grievances on the portal. Further details are covered in the section on oversight by government bodies and third parties.
- **Categorization of grievances:** Categorization of grievances depending on their nature and severity.
- **Assignment of responsibility for grievances:** Mapping stakeholders from the CBC organizations or external stakeholders to each grievance depending on the nature of the grievances.
- **Tracking the status of grievances:** Provide real time tracking and the status of grievances as they travel through multiple stages of the process.
- **Escalation of grievances on non-compliance:** Automatic escalation of grievances in cases of non-compliance with the defined timelines.
- **Monitoring and compliance:** Access for multiple stakeholders to conduct regular review and monitoring of customer grievances.

### 6.4. GRM Framework: Functional Architecture

GRM process has been designed keeping in consideration various aspects as discussed in the previous sections. The process has been sub-divided into four major steps as each of the steps has a specific outcome which can be shared with the customers, ABCs or third parties depending on the grievance. Having a specific outcome to each step will help in proper monitoring and reporting of the process.

A high level overview of the stages is as below:

Process Step #	Description	Outcome
1	<b>Registration of grievance:</b> Registration of grievance on portal with complete details required as per the system.	Unique grievance ID
2	<b>Categorization of grievance:</b> Mapping of grievance to stakeholders as per business rule and estimation of resolution time.	Responsible stakeholder, resolution time



3	<b><u>Resolution of grievance:</u></b> Resolution of grievance as per SLA and escalations if required, intimation to customer about the resolution.	Resolution confirmation to customer/ABC
4	<b><u>Closure of grievance:</u></b> Closure of grievance after giving opportunity to customer for reopening grievance.	Closure confirmation to customer/ABC

A detailed architecture of the grievance resolution process framework has been included below which provides a high level view of the overall process in grievance resolution.

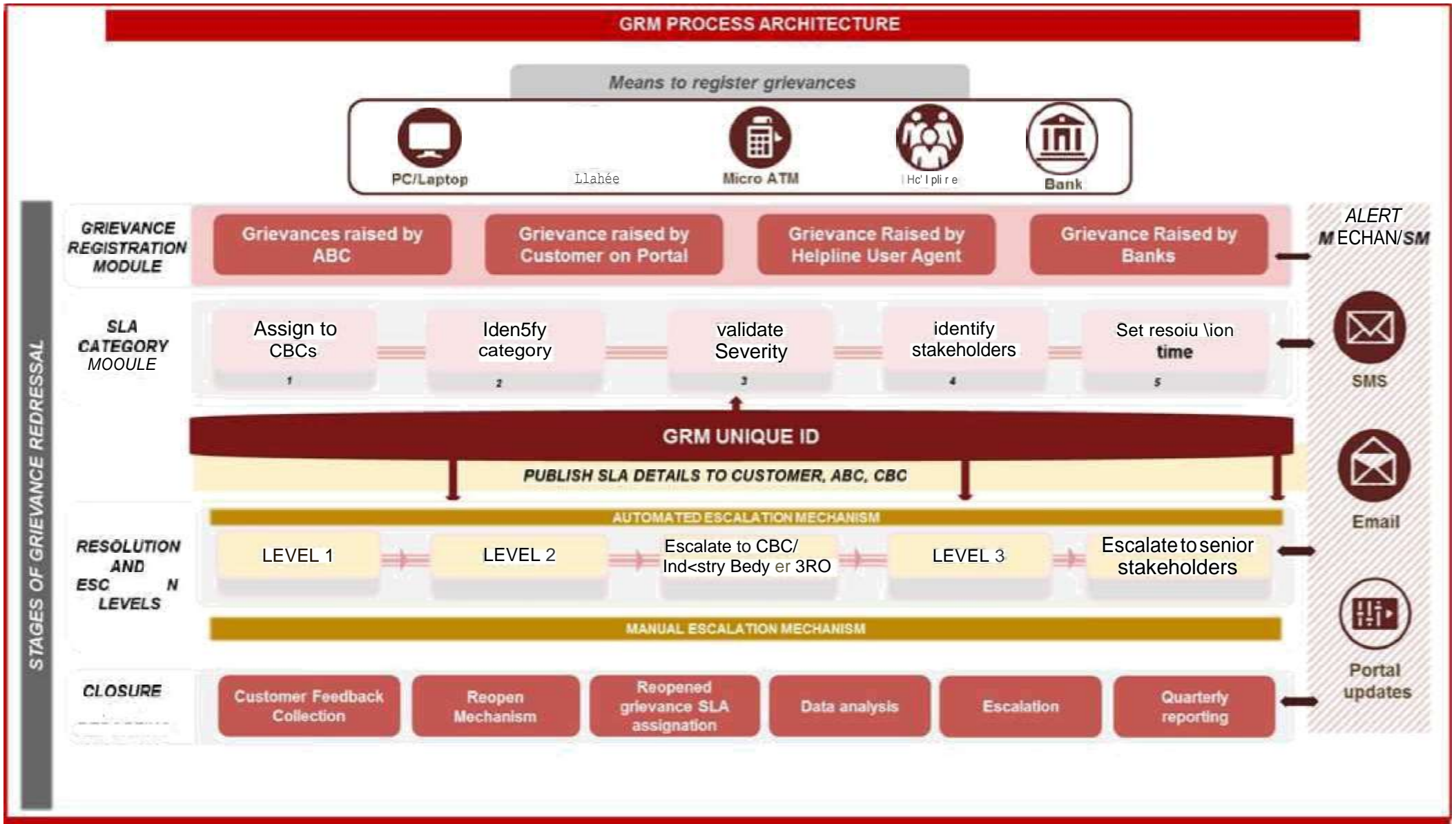


Figure a: Proposed GRM Architecture

### 6.4.1. Stakeholders and systems in the GRM process

The details of the steps to be followed in the above process framework along with the stakeholders and systems for each stage are outlined below. These steps are outlined to provide a high level overview of the process. The details of each stage are discussed subsequently.

#### 6.4.1.1. Grievance registration

This is the first stage for registration of module with unique grievance ID as the output. The steps for three ways grievances can be registered are as below:

##### 6.4.1.1.1. Grievances registered by customers themselves

Step No.	Role / Stakeholder	System	Steps to be performed
1	Customer	GRM interface for customers	Customer initiates the grievance through GRM Portal
2	Customer	GRM interface for customers	Customer enters the details onto the portal
3	Customer	GRM interface for customers	Details entered by Customer are validated by the GRM engine
4	Auto generated	GRM Alert Engine	Customer receives SMS + Email with GRM ID

##### 6.4.1.1.2. Grievance registered through helpline

Step No.	Role / Stakeholder	System	Steps to be performed
1	Customer	GRM Helpline	Customer calls the helpline to initiate a new grievance
2	Helpline Executive	GRM Interface for Helpline	Helpline executive updates the data on the GRM portal
3	Helpline Executive	GRM Interface for Helpline	Customer helpline agent requests the customer data and the issue faced
4	Helpline Executive	GRM Interface for Helpline	Customer helpline agent logs the grievance on the portal
5	Auto generated	GRM Alert Engine	Customer receives SMS + Email with GRM ID

##### 6.4.1.1.3. Grievance registered by ABC or third party

Step No.	Role / Stakeholder	System	Steps to be performed
1	Customer	ABC/third party Device	Customer reaches out to the ABC/third party for raising a new grievance
2	ABC /third party	GRM Interface for ABC/third party	Details of Customer are validated by ABC/third party using the GRM portal

Step No.	Role / Stakeholder	System	Steps to be performed
3	ABC/third party	GRM Interface for ABC/third party	ABC/third party logs the grievance on the GRM portal
4	Auto generated	GRM Alert Engine	Customer receives SMS + Email + Receipt with GRM ID

### 6.4.1.2. Grievance categorization

This stage consists of validation of severity, assignation of SLA and responsible official to the grievance. The outcome for this stage is that the customer/ABC receives SMS and Email alert on the resolution time and the details of assigned official.

#### 6.4.1.2.1. Newly registered grievance

Step No.	Role / Stakeholder	System	Steps to be performed
1	CBC	GRM interface for CBC	Logged grievance in GRM is received by CBC
2	Grievance resolution team	GRM Grievance Categorization Module	Grievance severity is validated
3	Grievance resolution team	GRM interface for grievance resolution team	In case severity is not valid, grievance resolution team identifies the severity and allocates the estimated time
4	Auto generated	Grievance SLA category module	Estimated resolution time is allocated to the grievance, in case the severity is valid
5	Grievance resolution team/ Auto generated	GRM interface for grievance resolution team, grievance SLA category module	Once the time is allocated, an official is assigned
6	Auto generated	GRM Alert Engine	Customer receives SMS + Email + Receipt with GRM ID

#### 6.4.1.2.2. Escalated grievance

S. No.	Role / Stakeholder	System	Steps to be performed
1	Grievance resolution team	GRM interface for grievance resolution team	In case of reopened grievances, SLA time is reassigned by the grievance resolution team

S. No.	Role / Stakeholder	System	Steps to be performed
2	Grievance resolution team or Auto generated	GRM interface for grievance resolution team	Official is assigned to all unresolved grievances
3	Auto generated	GRM Alert Engine	Customer/Agent receives SMS + Email + Receipt with GRM ID

### 6.4.1.3. Grievance resolution and escalation

This is the third stage of the process where the resolution is provided to the customer/ABC. There are auto-generated escalations in this stage for cases where the resolution is not provided as per timelines. The output of this stage is that the customer received the details of resolution. The steps in this stage are as under.

Step No.	Role / Stakeholder	System	Steps to be performed
1	Grievance resolution team	GRM Interface for grievance resolution Team	Grievance resolution team and the assigned official resolve the grievance and update the status to <i>Grievance under resolution</i> on the GRM portal
2	Grievance resolution team	GRM Interface for Grievance resolution team	If the grievance is resolved within the time frame allotted in previous module, Go to Step 5
3	Auto generated	GRM interface for Grievance resolution team	If the grievance is not resolved within the time frame allotted in the previous module, the grievance is auto escalated to the next level (L2, L3), BCFI and Senior Stakeholders in CBC organizations are alerted. Next level official is assigned
4	Grievance resolution team	GRM interface for Grievance resolution team	a) Next level Grievance resolution team official oversees the resolution of grievance and updates the status to <i>Grievance under resolution</i> on the GRM portal B) Escalated grievances are consolidated for later reporting.  Go to Step 3

Step No.	Role / Stakeholder	System	Steps to be performed
5	Grievance resolution team	GRM Alert Engine	GRM portal is updated with the resolution details Customer/ABC is notified of the resolution through Email, SLA

#### 6.4.1.4. Grievance closure

This is the last stage of the process wherein the customer/ABC is intimated about the resolution, and customer/ABC has the option of re-opening the grievance in case of non-resolution of grievance.

Step No.	Role / Stakeholder	System	Steps to be performed
1	Grievance resolution team	GRM interface for grievance resolution team + GRM Alert Engine	Grievance resolution team seeks feedback from the customer/ABC through different channels
2	Grievance resolution team	GRM interface for grievance resolution team	Has the customer / ABC reverted with the customer feedback on adequate resolution within 7 Days?  If No, Grievance is closed  If Yes, Go to next step
3	Grievance resolution team	GRM interface for grievance resolution team	Has the customer / ABC reverted with the customer feedback on adequate resolution within 7 Days?  If yes, identify the stakeholders from grievance resolution team to reopen the grievance
4	Grievance resolution team	GRM interface for grievance resolution team	Ticket is reopened by Grievance resolution team by analyzing the feedback received from the Customer/ABC
5	Grievance resolution team	GRM Alert Engine	Notification is sent to CBC and Senior Stakeholders of GRM Team and BCFI stakeholders, the remaining flow is handled in Grievance resolution Team

### **6.4.2. GRM Process flow diagram**

A consolidated diagram of the process flow has been included to get a holistic view of the GRM process

# GRM FRAMEWORK PROCESS FLOW DIAGRAM

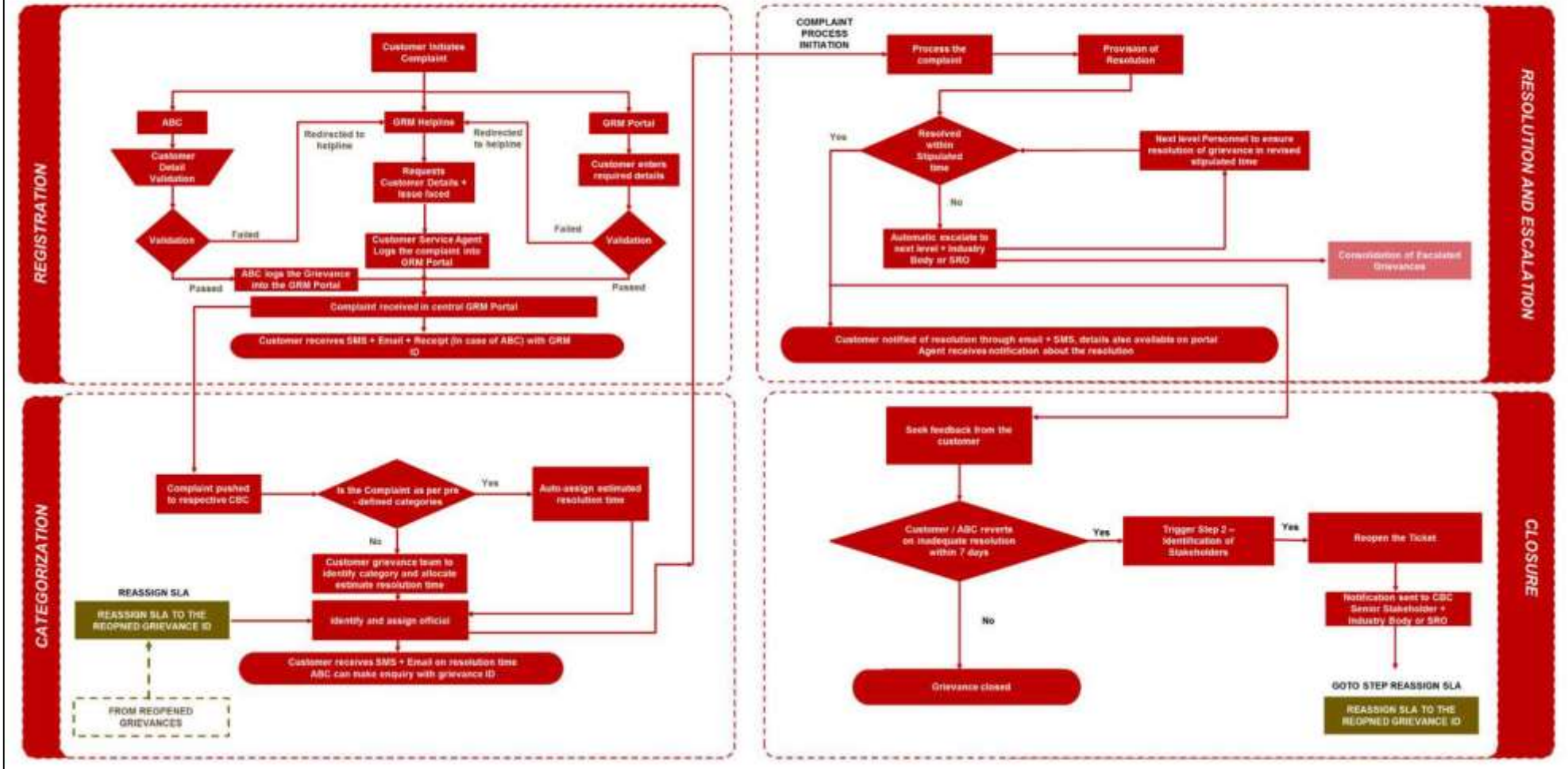


Figure 3: \* RMPProcessFlowDiagram



### 6.4.3. Detailed GRM Process

The various stages of grievance resolution process as identified in the previous sections are explained in detail in the subsequent sub-sections.

#### 6.4.3.1. Registration of grievance

This is the first step in the registration of a grievance by the customer or ABC or third parties through various means made available, which are discussed in the subsequent sections.

##### 6.4.3.1.1. Modes to register grievances

All the grievances will be registered on the GRM portal, which will be integrated with the respective technology systems of all CBCs. There will be slight variation in the process of registration of grievances by customers as compared to ABCs and third parties since they will have greater understanding as compared to customers. ABCs and third parties will also have the responsibility of registering grievances on behalf of the customers.

##### 6.4.3.1.1.1. Modes for customers

There will be three major channels for customers to register grievances listed below:

- **ABC or third parties:**

- **ABC:** ABC being the first point of contact for customers, is responsible for addressing most of the customer grievances. The grievances, which cannot be resolved by ABCs in their respective capacity will require intervention from the CBCs or Banks depending on the nature of grievance. The ABCs will have access to the GRM portal either through their Micro ATM device or personal computer/laptop wherein the whole process of registration of grievances can be completed on behalf of the customer.

ABC will access the GRM portal through their device or application. As a first step in registering grievances, the authenticity of the customer will be checked which could be done through multiple modes such as biometric authentication, OTP based authentications, Debit Card PIN based authentication, etc. Authentication of customer will help in customer identification and communication in the subsequent stages of the process. In case there is some challenge in authenticating the customer by the ABC, helpline can be contacted either by the ABC or the customer.

- **Third parties:** Third parties will also be able to register grievances on behalf of customers as in some cases the third parties such as banks, block development officers, district magistrates will be able to support customer in getting quick resolution for their grievances. Third parties will be able to log into the portal either through web portal using laptop, personal computer, mobile device or through mobile applications.
- **GRM Portal:** The customers will also have the option of accessing the GRM portal themselves. The likelihood of customers exploring this mode could be less as compared to other modes but from a future standpoint, having such an option will add to the strength of the whole GRM system. The customers will be able to access the portal either using a PC/Laptop or through their mobile phones to register the

grievances themselves. Registering a grievance will require authentication from the customer which could be through modes such as OTP based authentication or ATM PIN. In case the customer faces issues in registering complaint through the portal, the same could be done with the help of helpline, the details of which will be prominently displayed on the portal.

- **Helpline:** A helpline will be set up for registration of grievances on the portal. The portal will also serve as a means for other aspects of GRM such as checking the status and escalation of grievances which are covered in detail in other sections of the report.

**IVRS based system:** To reduce the extent of manual intervention of customer service agent in the process and decrease the overall cost, initial parts of the process will be automated wherein the basic details of the customer will be captured. In addition to receiving customer details, there will be a segregation in terms of the purpose of the call which can further streamline the process. The first level segregation at the beginning of the call is as under:

- **Nature of grievance:** This will help identify whether the grievance is a customer grievance or an agent grievance.
- **Stage of grievance:** This will help identify whether the call is for registering a new grievances, follow up call for a registered grievance or for escalation of grievance.
- **Customer verification:** Authentication of customer will be automated, in cases where customers or agents are not able to do authentication there will be an option to be redirected to a customer service agent.
- **Grievance details:** There will be subsequent stages on IVRS wherein the customers will be able to register grievances as per the detailed process outlined in the subsequent sub-section. There will be option to be redirected to customer service agent at various stages where the customers or agents face any challenge in registering the grievance.

The role of customer service agents will be to cater to customers or agents in cases where they cannot complete the request on the IVRS or need assistance which is in line with the overall objective of cost reduction through greater usage of technology.

#### 6.4.3.1.1.2. Modes for ABCs

The ABCs will be able to register their own grievances either through the GRM portal or through the CBC helpline. The GRM portal will be a preferred mode to register grievances and the helpline will be used only in the case of exceptions. ABCs too will have the option of approaching third parties such as financial inclusion team of banks, state level bankers' committee etc. for getting their grievances registered.

#### 6.4.3.1.2. *Registration of grievances*

The registration process will have variation for customers and ABCs. All the grievances will be directed to the GRM portal. The process of registration of grievances will be separate for customer grievances and agent grievances. The difference between the process of registration of grievances for agent and customer are mentioned in the subsequent sub-sections.

### 6.4.3.1.2.1. Registration of customer grievances

For registration of customer grievances, first step will be the authentication of customers following which further details will be required from the customer to process the request. The detailed steps are as under:

- **Customer Details:** To make the portal user friendly, the system will be designed in such a way that upon authentication, the basic details of the customers are auto-populated by accessing third party databases such as Banks, UIDAI, etc., depending on the levels of access available. Remaining fields will be required to be populated. The customer details required will be as under:
  - Customer Name
  - Aadhaar Number
  - Account Number
  - Bank Name
  - CBC Name
  - Mobile Number
  - Email address (**Optional**)
- **Grievance Category:** To streamline the subsequent stages of the process, the customer/ABC/third parties will be required to select the category of grievance from a drop-down available in the system. The availability of pre-defined categories will also help the customers/ABC/third parties to identify the category that matches closely with the grievance. There will be various sub-sections of the grievance categories to help the customers/ABC/third parties identify the exact situation that matches the grievance to be registered. However, the intent of providing these sub-categories is to provide greater utility and not be a hindrance in the process, there will be option to manually enter the grievance in case of difficulty in locating the grievance in available categories.

The categories of grievances are by severity level as under:

S. No.	Severity Category	Grievance Category
1	S1 (Lowest in Severity)	<ul style="list-style-type: none"> <li>• Delay in closure of account</li> <li>• Delayed clearing or failure of transactions</li> <li>• Inadequate basic facilities at mini-branch</li> <li>• Long queues for service</li> <li>• Delayed disbursement of funds for loans</li> <li>• Non-availability of agent in field/CSP</li> </ul>
2	S2 (Medium Severity)	<ul style="list-style-type: none"> <li>• Delay in account opening process</li> <li>• Non issuance of receipt</li> <li>• Delay in receiving funds</li> <li>• Error in authentication</li> <li>• Third party schemes/transactions with external dependency</li> </ul>

<b>3</b>	S3 <b>(Highest Severity)</b>	<ul style="list-style-type: none"> <li>• Fee/charges higher than prescribed limit</li> <li>• Extra/Wrong debit from customer account</li> <li>• Denial of service</li> <li>• Discrimination by agent or misbehavior</li> <li>• Refusal to register grievance</li> <li>• Fraud and irregularities</li> </ul>
----------	---------------------------------	---

For other categories of grievances, the customers will be required to manually enter the severity and the same will be validated by the grievance teams of the respective CBCs.

- **Severity:** Customers/ABCs/third parties will be required to select the severity level of the grievance depending of the complaint. Severity can be spread across three levels : S1, S2 and S3 with S3 being the most severe which will be displayed on the portal. As an in-built mechanism, customers/ABCs/third parties will be shown suggestions as to what should be the severity level of the grievance. The severity level can be reviewed in the next stage by the CBC for cases where severity levels are wrongly attributed to grievances. In cases when the ABCs or executives from the helpline are registering grievances, they will be required to correctly map the severity level.
- **CBC details:** The details specific to CBC will be required for effective streamlining in the subsequent stages and it will also help in monitoring the incidence of complaints for different CBCs and regions. The required details are below:
  - CBC Name
  - State
  - Region
  - ABC Name (**Optional**)
- **Transaction details:** In case the grievance is related to a particular transaction, the details for the transaction will be entered in this section. There will also be a provision, that if the customer/ABC/third party does not have the transaction number then there should be provision for entering the date of transaction, nature of transaction etc. which will help the support teams in easily triangulating the transaction details.
  - Transaction number (**Optional**)
  - Day of transaction
  - Time of transaction
  - Comments on transactions (**Text box**)
- **Grievance Details:** This section will help customers/ABC/third parties to elaborate further details of the grievance and a text box will be made available for entering specific details of the grievance.

#### 6.4.3.1.2.2. Registration of agent grievances

Agents will be able to register their own grievances on the portal wherein there will be a separate section for registering agent grievances. There will be various fields for agent to register grievances which are listed below.

- **Agent details:** As a prerequisite, and as discussed in the previous section, wherein the agent will require to be registered on the portal after completion of all the trainings. The agent details will be pre-loaded in the system. The agent will be required to log in using their respective employee IDs on the system and the agent details will be populated in the system.
- **Grievance category:** Similar to the case of customer grievances, there will be various pre-defined categories of agent grievances which be present in the portal for agent to select. These categories will help in streamlining the process and also help agents to identify the closest category that matches their grievances. The categories for agent grievances as per severity level are as under:

S. No.	Severity Category	Grievance Category
1	S1 (Lowest in Severity)	<ul style="list-style-type: none"> <li>• Challenges in getting cash from bank</li> <li>• Server connectivity issues</li> <li>• Network connectivity issues</li> <li>• Inability to check historical transactions done by ABC</li> <li>• Inability to check incentive structure and incentive received</li> </ul>
2	S2 (Medium Severity)	<ul style="list-style-type: none"> <li>• Server connectivity issues</li> <li>• Software issues</li> <li>• Frequent transaction failure</li> <li>• Delay in refund for failed transactions (In cases of cash paid by ABC)</li> </ul>
3	S3 (Highest Severity)	<ul style="list-style-type: none"> <li>• Device malfunction</li> <li>• Delay in replenishment of ABC account</li> <li>• Transaction done for wrong account</li> <li>• Financial irregularities by customer/CBC/Bank</li> <li>• Delay in remuneration</li> </ul>

For other categories of grievances, the agents will be required to manually enter the severity and the same will be validated by the grievance teams of the respective CBCs.

- **Severity:** Agents will be able to select the severity of the grievance depending on the nature of the grievance. There will be three categories of severity similar to customer grievances, i.e., S1, S2 and S3 with S3 being most severe. There will be suggestion on the portal as to what the severity is. The severity levels will be checked by the CBC further to verify if correct severity level has been attributed to the grievance.
- **Transaction details (Optional):** In cases where the grievance pertains to a specific transactions, the ABC will have the option of entering the transaction details for the same.

- **Grievance details:** This section will allow the ABC to enter further details related to the grievance wherein the information which has not been captured in the previous fields of the grievance will be captured.

#### 6.4.3.1.2.3. Generation of Unique Identifier for the Grievance and acknowledgement

Once registration details are entered on the portal, the portal will generate a unique grievance number in real time which will be displayed on the portal as well as sent to the customer/ABC on the registered mobile number/number provided at the time of registration of grievance via SMS. In addition, the customers who have registered their email address will also receive an email. The ABCs will also receive an email on their registered email ID on the portal.

For grievances registered with the ABCs, there will be a provision of providing a printed receipt bearing the unique grievance number for easy reference by the customer/ABCs. In addition, the ABCs will also have access to grievances registered by them on their portal which to facilitate easy tracking of grievances and providing regular status updates to the customer.

### 6.4.3.2. Categorization of grievances

#### 6.4.3.2.1. At portal

Once the grievances are registered on the GRM portal, the grievances will be forwarded to the respective CBCs based on pre-defined business rules. The grievances will flow to specific teams based on the category of grievances within CBCs or a grievance team depending on the internal organizational structure of CBCs. A re-validation on the categorization of grievances will be done by the respective CBCs based on the grievance details as entered by the customer/ABC/third party.

The business rules for categorization of grievances will be as under:

- **Type of CBC:** Depending on the type of CBC such as PPI BC, Pure Play BC, MFI BC or Retailer BC, the rules will be different due to variation in the nature of services provided by the respective CBCs.
- **Severity of grievance:** The grievances will be categorized depending on the nature of grievance, business impact and customer considerations. The categorization will be pre-decided for complaints under various categories as defined in the previous section for different type of CBCs. A second level check will be done by respective CBCs on the severity of the grievances. In cases where the severity level has been changed, the same will be communicated to the customer/ABC via SMS or email. There will be three levels of severity depending on the nature of the grievance: S1, S2 and S3 with S3 being most severe and the same will be displayed on the portal.
- **Dependency for resolution:** The complaints will also be categorized depending on the dependency on various stakeholders for resolution. The broad categories for segregating complaints are as under:
  - **Internal dependency:** Grievances under this category will require coordination with internal stakeholders in the respective CBC organizations. The resolution time for such grievances will be less as compared to grievances requiring support from external stakeholders.

- **External dependency:** Grievances under this category will require coordination with external stakeholders such as Banks and SLAs will be according to the nature of grievances. The SLAs for some of the grievances will be higher as compared to grievances with internal dependencies. In case of banks, the grievances can be pushed to the branches as the routes for resolution via the banking channel is faster.

#### 6.4.3.2.2. *SLA Sharing*

The resolution time for all grievances will be fixed by considering the aforementioned factors. Once the grievance has been categorized, the next step for resolution will be mapping of relevant stakeholders in the CBC organization for resolution of grievances. Each of the CBC organizations will be required to map the category of grievances with their organizational structure to allocate grievance categories to different stakeholders.

#### 6.4.3.2.3. *Acknowledgment of resolution time*

Once the process of categorization of grievances is completed, the system will send a notification to the customer or ABC on the exact resolution time and the name of the official from the CBC organization for resolving the grievance. For cases where the grievances are registered by the ABC on behalf of the customer, the ABC will also receive notification on the same. The ABC will also be able to see the status of grievances pertaining to transactions executed by the ABCs as this will help in communicating the status of grievances to the customers.

### 6.4.3.3. *Resolution of grievances*

Once the grievances are categorized and sent to the respective stakeholders within the CBC organizations and external entities, the grievances will require to be closed within the stipulated time for resolution. The customers/ABCs will be able to see the status of the grievance on the portal, which will be more relevant in cases where the resolution times are longer.

#### 6.4.3.3.1. *Periodic updates on grievances*

As a part of the process, the customers /ABCs will receive constant notifications on the status of the process. As soon as some updates are made by the official responsible for the resolution of the grievance, an automated SMS alert and email will be sent to the customers or ABCs

#### 6.4.3.3.2. *Escalation of grievances*

In cases where the grievances are not resolved within the stipulated timeline, the system will automatically trigger escalations within the CBC organizations. In cases of repeated escalations, grievance redressal cell in BCFI will also be notified of the escalations. The automatic escalations on the portal will be time based escalations wherein the escalations happen automatically as per the timelines for resolution. Event based escalations will occur when customers/ABCs are not satisfied with the resolution once the same has been communicated, the details are covered in the next section.

In cases where the grievances are not resolved within the stipulated time, an automatic trigger will send notification to second level within the CBC organization. The second level will be mapped as per the organizational structure of the respective CBC organizations. The SLAs for auto-escalated grievances will be different as compared to grievances registered for the first time. The process for auto-escalation will continue in case of non-resolution of grievances.

The mechanism for escalation of grievances will be as under:

- **Level 1 (L1) escalation:** In cases where the grievances are not resolved within the stipulated time, automatic notification will be sent to the next level supervisor and the name of the supervisor will be tagged in the GRM system. In cases of requirement of support from external stakeholders, the details of external stakeholders will also be tagged in the system along with notifications sent to them. Details of the same will also be shared with the customer and with ABCs in cases where the grievances are initiated with the ABCs.
  - **TAT as per severity level:** The turn-around times will be different depending on the severity of the grievance. For S1 escalation, the resolution will be required to be provided within 10 working days otherwise the escalation will become a second level escalation. For S2 escalations, the resolution will be required to be provided in 7 working days else it will become a second level escalation. For S3 escalation, the resolution will be required to be provided in three working days else repeated triggers will be sent to senior management and BCFI.
  - **Type of officers handling L1 escalation:** Level of senior manager as per the respective CBC will be tagged in the first level escalations.
- **Level 2 (L2) escalation:** In cases where the grievances with first level escalation are not resolved within the stipulated resolution time, those grievances will be escalated to second level grievances. A senior management executive from the CBC organization will also be tagged in the portal for review. In addition, second level escalations will also be sent to the BCFI. The second level escalations will be flagged and sent to external stakeholders in case of any intervention required from them.
  - **TAT as per severity level:** The turn-around time for second level escalation will be 10 days for L1 severity, failing which it will become a third level escalation. For S2, the resolution time will be 3 working days else the escalation will become a third level escalation. For S3, the resolution time will be 3 working days.
  - **Type of officers handling L2 escalation:** General Manager or equivalent will be tagged in second level escalations.
- **Level 3 (L3) escalation:** In cases where the second level grievances are not resolved within the stipulated time, those grievances will be escalated as third level grievances. The senior management from the CBC organizations will be required to be tagged in the system. These escalations will be flagged and sent to the BCFI and senior management in the CBC organizations. For grievances requiring support from third party organizations, the details of escalation will be sent to senior management in the third party organizations.
  - **TAT as per severity level:** All third level escalations will require to be resolved within three working days after which repeated triggers will be sent to various stakeholders and BCFI.
  - **Type of officers handling L3 escalation:** Senior management from the CBC will be tagged in third level escalation and separate mail will be sent to BCFI.

#### 6.4.3.3.3. *Communication of resolution*

As soon as the grievance is resolved at the CBC level, the same will be required to be updated on the portal. As soon as the grievance status is updated, the customers/ABCs will receive an automatic alert through SMS and email on the resolution provided. It will be the responsibility of customer or ABC to check whether the grievance has been resolved as per their satisfaction or not and re-open the grievance within the stipulated timeframe.



#### 6.4.3.4. *Closure of grievances*

Once the grievance is resolved, the customer /ABC will be intimated of the resolution provided by the CBC. There is a possibility of grievances being closed without proper resolution being provided to the customers/ABCs, and raising a grievance again will require the same amount of waiting time for resolution. To avoid such a situation, there will be an option with the customers/ABCs to re-open a grievance for which adequate resolution has not been provided.

##### 6.4.3.4.1. *Reopening Process*

There will be a provision in the system for re-opening of grievances within 7 working days of providing resolution. The re-opening of grievances could be done through either of the modes as discussed in the previous sections, irrespective of the mode through which the grievances were initially registered.

The re-opened grievances will be tagged in the GRM portal and members from both the CBC organizations and the BCFI will be able to see re-opened grievances. In case of escalations due to resolution not being provided for re-opened grievances in the stipulated time, there will be separate flags to be raised with the CBC organizations and BCFI with same auto-escalation mechanism as discussed in the previous sections.

In cases where the customers/ABCs are satisfied with the resolution, the grievances will be considered as resolved. The details of the resolved grievances will be stored in a repository which can be shared with BCFI and can be used for periodic analysis for understand the most common type of grievances, average time taken to resolve grievances by different CBCs and various other parameters.

### 6.5. *GRM Framework: Technical Architecture*

A GRM portal will be deployed for managing the entire GRM process and it will be the primary medium for all activities related to GRM. The GRM portal will be integrated with the technology systems of all CBCs, Banks and third parties for seamless flow of information. The framework will be accessible by selected stakeholders in the BC ecosystem and have varying levels of access depending on the requirements. The key features of the portal have been discussed in the subsequent sections along with the key benefits of having a GRM portal.

#### 6.5.1. *Features of GRM Portal*

The GRM portal will have capability to accept grievances from multiple channels and provide support for all the stakeholders in the BC ecosystem. The GRM needs to be user friendly and have basic specifications to suit the requirements of all the users of the GRM portal. Key features and functionalities of the portal to increase its utility and ease of use include:

- **Support for regional languages:** As a segment of the users for registering the grievances is customers themselves, there needs to be support for all major languages on the portal which will help in catering to all kinds of customers.
- **Availability:** The portal will be available on all days 24X7.
- **Accessibility:** The portal will have integration with mobile interfaces as well. As a lot of customers do not have the luxury of having access to laptop/desktop, the portal should be accessible through mobile and there will be a separate mobile application. The details on accessibility are covered in the subsequent sub-section.

- **User training material:** The portal will prominently display a link to a section having information on the basic functionalities of the portal, frequently asked questions, basic troubleshooting etc. by means of both written guide and video tutorials in multiple languages.
- **Escalation Mechanism:** The portal will also contain the details of the entire GRM process along with details on the escalation mechanism, SLA for different types of grievances, prerequisites for escalating grievances, role of various government bodies, third parties etc.
- **Information on helpline:** In cases where the customers or agents are facing troubles in using the portal, there will be a support helpline available 10 hours a day from Monday to Saturday to provide support in multiple languages. In addition to the helpline, there will be an option to access the contact details of bank/CBC officials by selecting appropriate fields.
- **Chat bot based support:** There will be chat bot based support on the portal. Upon landing on the home page of the portal, there will be an automatic pop-up asking for details from the customer. The chat bot will adhere to the GRM processes as outlined in the subsequent sections and will be an alternative to the IVRS based system on the helpline. The chat bot will help in automating the manual parts of the whole process and reduce cost of maintaining equivalent number of customer care executives. In cases where the customers/agents are not able to register a complaint using chat bot, they can be redirected to customer care executives for completion of the remaining process.
- **Ability to configure business rules:** As the regulatory and business landscape keeps on evolving, there will be a provision to easily update the rules on the GRM portal for ensuring smooth functioning of the portal. The details are covered in in the section on continuous improvement and changes in GRM processes and systems.
- **Master data entry by CBCs on their employees:** CBCs should be able to enter the details of all their employees as the employees will be tagged in the system for assigning them to various grievances. In addition, it will also be helpful for other stakeholders to intervene and get status updates on various grievances.

### ***6.5.2. Accessibility of portal***

There will be multiple modes available to access the portal to ensure convenience both for customers and ABCs. ABCs will be using their Micro ATM/Personal Computer/Laptop for daily operations which can be used as a means to access the portal. In addition to these modes there will be a mobile application for the portal. The web-based application will be accessible through browser on mobile phones, but a dedicated mobile application can enhance the user experience for customers. The portal will also be accessible to government bodies, regulators, third parties etc. for registering grievances relevant to the BC services either independently or on behalf of customers/ABCs. The details of mobile application is discussed in the sub-section.

**Mobile application for GRM portal:** A dedicated mobile application will be developed and linked to the GRM portal. The main target segment for this application will be the customers as mobile application can greatly improve the usability of the portal. The app will also be accessible to agents as an alternative means to register grievances and can be helpful in scenarios such as device malfunction, inability to access the CBC portal etc. The mobile application has been envisaged keeping in consideration the increasing internet penetration, availability of low cost smartphones and increased adoption by large sections of the society.

### 6.5.3. Key Benefits of Reporting and Tracking of Grievances

With the help of a GRM portal, the challenges in terms of standardization of grievance related data and timely reporting can be addressed as all the grievance resolution will be updated in real time. The advantages of regular reporting and tracking of grievances are as under:

- **Timely intervention by stakeholders:** The ability of system to generate real time report on various parameters will help all stakeholders to get a real time view of the grievances.
- **Performance review of responsible parties:** The design of the process will help identify all the concerned stakeholders in various organizations and help ascertain performance of different members/teams in respective organizations after the data is shared with BCFI. Individual CBCs can also analyze their respective data.
- **Identification of systemic challenges affecting the BC ecosystem:** Analysis of grievance data from various CBCs will help in analyzing challenges faced by the entire industry; and those challenges could be pursued at a collective level with external entities such as Banks, regulators and government bodies.
- **Identification of best practices:** Comparison of grievance data from various CBCs will help in identifying the best performers for various grievance categories and the best practices from those CBCs could be considered for other CBCs lagging in those categories.

## 6.6. GRM Components

This section covers various aspects of a standardized GRM to be implemented across the BC ecosystem. The various aspects are in line with the overall objective of implementing a unified and standardized GRM across the BC ecosystem. The key components are described in this section, some additional components are included in the annexure.

### 6.6.1. Grievance Identification

Identification of grievances with a unique ID will be an intrinsic part of the GRM system as it is required for tracking and monitoring. It will also be convenient for various entities within the BC ecosystem such as customers, ABCs, CBC stakeholders, BCFI, Banks, government bodies, etc., to communicate the status of a grievance.

#### 6.6.1.1. KYC based Grievances

##### **For customers:**

For providing quick and adequate resolution of grievances to customers, the stakeholders responsible for providing resolution should have access to all the required information such as customer name, account number, mobile number etc. because these details will be required for accessing other internal systems in CBCs, Banks, etc.

Customers/Agents will be required to furnish some basic details related to the grievance such as account number and account holders name followed by authentication. Following means will be available for authentication:

- A. Biometric authentication for cases where the grievance is registered through ABC or web based portal
- B. OTP based authentication

### C. Debit card PIN based authentication

In cases where the customers do not have the required details, they can approach the helpline for registering grievance or seek support from either the CBC helpline or Bank or any third party.

#### **For agents:**

As agents will have the responsibility of assisting customers in the grievance redressal process it is essential that are registered on the portal. All CBCs will be required to ensure that all the ABCs are registered on the GRM portal and can log into the system using their employee ID.

The agents can raise ABC grievance upon logging in with their employee ID and no additional details will be required from them. They will be able to see the details of grievances registered by them on behalf of their customers and for themselves on the portal.

#### **For government bodies and third parties:**

Government bodies such as office of district magistrate, block development officer, department of financial services, etc. and third parties will also be able to register grievances either independently or on behalf of customers or ABCs. The role of these bodies will be twofold i.e. to register fresh grievances for grievances/inefficiencies/inadequacy observed directly by them or reported to them, and to follow up existing grievances which are already registered on the portal.

## ***6.6.2. Grievance Acceptance Channels***

### ***6.6.2.1. Web based- portal***

Web based portal will be the primary channel for registering grievances registered by customers/agents/government bodies and third parties, however the web based portal could be accessed through various modes such as personal computer, laptop, mobile browser or through mobile application which will be integrated with the portal. It will capture all the pertinent details of the grievance and redirect it to the concerned stakeholders quickly. GRM portal will ensure that the GRM process works efficiently and grievances are resolved within the stipulated timelines.

### ***6.6.2.2. Complaints received using Banks Systems/Helpline***

Banks will also be able to register grievances on the GRM portal of respective CBCs for grievances identified by themselves specific to any of the CBCs or ABCs, or registered by the customers or agents with them.

**a. Using Bank's Portal/Helpline:** The customers or agents will be able to register grievances with the banks either through the banks' helpline or by visiting the concerned officials.

**b. Integration of Bank's System with CBC GRM for automated exchange of grievances:** In case any grievance related to ABCs and CBCs are received on bank portal, then banks systems (dealing with any of the CBCs) are proposed to be integrated with the GRM portal through APIs wherein the grievances specific to BC ecosystem can be registered by the banks using their systems and will automatically be transferred to the GRM portal. Once the grievance is received on the GRM portal from banks, the remaining modalities will remain the same as discussed in various sections of the framework. The notifications and response of the grievance will also be updated using systems.

### 6.6.2.3. *Phone Based*

In line with the objectives of having a GRM portal, a helpline will augment the utility of GRM portal. The helpline will help in registering all customer/ABC/government or third party grievances. The following will be the salient features of the helpline:

- **Language support:** The helpline will have support for all major languages in the country to provide a convenient way for agents/customers to register grievances.
- **Availability:** The helpline will be available for 12 hours a day (8 AM to 8 PM) on 7 days of the week.
- **Charges:** No charges will be levied from customers/agents and the helpline will be a toll free number

#### 6.6.2.3.1. *Common Helpline by BCFI*

In cases where adequate support is not provided on the CBC helpline or the CBC helpline is not functional, a helpline by the BCFI will act as a means of escalation of grievances. However, it is to be noted that the helpline is to be used only in the case of exceptions. The following are the major support areas for which the helpline will be used:

- **Non-availability of CBC helpline or portal:** In cases where the CBC helpline or GRM portal is not accessible for large amounts of time or frequent non-availability, customers/agents/third parties could get the details on downtime from the proposed helpline and make escalations. The technology/operations team managing the CBCs GRM portal and helpline be required to keep BCFI in loop on various activities such as scheduled maintenance, planned downtime and resolution times for downtimes.
- **Inability to register grievance on CBC helpline:** In cases where the customers/agents do not get adequate support from the helpline, the grievances could be discussed on the proposed helpline wherein the designated team members will guide the customer/agent on the best course of action.
- **Lack of resolution even after escalation:** Customers/agents could approach the helpline in cases where they do not receive any resolution even after escalations

In addition to these specific areas, customers/agents could also call the helpline for general queries and information on the GRM process. A dedicated team to be set up in the BCFI having in-depth understanding of the GRM process, and have access to stakeholders in various CBC organizations for all GRM related queries or follow up.

### 6.6.3. *Real time tracking and monitoring*

A key component of the GRM framework will be regular review and monitoring of all the grievances to ensure resolution of grievances within timelines. The GRM portal being the core system will enable timely monitoring and compliance of the GRM process. There will be a central dashboard which will be regularly updated upon receiving data from various CBCs and will provide real time information on the entire GRM process. The access to grievance related data will vary as per the stakeholder and has been discussed in the subsequent sub-section.

### 6.6.3.1. *Different views for GRM dashboard*

There will be multiple views in the GRM dashboard for different stakeholders depending on their roles and responsibilities in the GRM process. The CBCs who have implemented the proposed GRM framework will be required to share periodic data in defined formats for regular updation of GRM dashboard. There will be different levels of access for different stakeholders as described below:

- **Customers:** Customers will be able to see the status of active grievances registered by them and the status of grievances as they flow through various stages of the process. Customers will also be able to see the historical grievances raised by them along with the associated details.
- **ABCs:** ABCs will have two levels of views to track the status of grievances:
  - **Grievances registered on behalf of customers:** ABCs will be able to see the list of grievances registered by them on behalf of the customers along with real time status of grievances as they flow through the various stages of the process. ABCs will also be able to see the all such historical grievances raised by them along with the associated details.
  - **Grievances registered for own grievances:** ABCs will be able to see the list of their own grievances registered by them as they flow through various stages of the process along with details of all historical grievances.
  - **BCFI:** Internal teams will have complete access to the entire GRM portal of the CBCs with a high level overview of the entire portal. The teams will also be able to have a granular view of grievances such as by type of CBC, category of grievances, present status of grievances as per the process, historical data of all grievances etc.
- **CBCs:** Stakeholders from CBC organizations will have different levels of access depending on their role in the GRM process. The details are as under:
  - **Grievance redressal teams:** The teams will be able to access details of grievances assigned to them as well as grievances resolved by them. The teams will also be able to see the stages through which the grievances travel in the process and the escalated grievances.
  - **Senior management:** Middle and senior management will be able to have a high level view of all the pending and resolved grievances with granular view in terms of the category of grievances, present status of grievance as per process, responsible stakeholders in CBC organizations etc.
- **External stakeholders:** External stakeholders such as banks, department of financial services, RBI, government bodies and other third parties will also have different levels of access depending on their role in the process. The details are as under:
  - **Grievance redressal teams:** The teams will be able to access details of grievances assigned to them as well as grievances resolved by them. The teams will also be able to see the stages through which the grievance travels in the process and the escalated grievances.
  - **Senior management:** Middle and senior management will be able to have a high level view of all the pending and resolved grievances with granular view in terms of the category of grievances, present status of grievances as per process, responsible stakeholders in their respective organizations, etc.

### 6.6.3.2. *Communication to customers and ABCs for tracking complaints*

Communicating the status of the grievances during various stages till the time grievances are resolved is an important component of the GRM process. Regular communication will help reinforce the trust of customers and ABCs on the entire GRM process. As discussed in the subsequent sections, each phase of the GRM will have certain outcomes such as creation of a unique grievance ID, allocation of officials responsible for resolution of grievance, time duration for resolution of grievance etc. which will be required to be communicated to the customers/ABCs.

The communication channels used for conveying the status of the grievances will include both SMS and email. These channels will be fully automated & standardized wherein every change in the status of grievance will trigger an automated response to be sent to the customers/ABCs. In addition to these channels, customers will also have the option of following up on the CBC helpline.

All the initiatives mentioned above will help continually improve the service provided to the customers and at the same time ensure that agents get the required support from all the stakeholders as envisaged in the BC model.

### 6.6.3.3. *Quarterly Reporting by BCFI*

Banks are the most important stakeholder in the BC ecosystem, and it is imperative that Banks also play a role in the entire GRM process followed in the BC ecosystem. As per the GRM framework discussed in the previous sections, the grievances with external dependencies will be flagged for review of both internal and external stakeholders. The grievances having dependency on banks also form a significant share of the total grievances as identified in the assessment phase. The financial inclusion teams for BC operations in the respective banks will also receive the details of escalated grievances for their respective banks.

Banks will be required to report the details of grievances received by them on a regular basis helping in identification of the most common categories of grievances and help improve the services offered. Another advantage of reporting by the banks will be identification of banks which are most responsive to the requirements of both CBCs and ABCs. This assumes greater significance when “white label” BCs are considered, as quarterly reporting by banks can help various CBCs assess the ideal banks for partnership and help in providing the best services to end customers.

#### 6.6.3.3.1. *Format and frequency of reporting*

All the banks associated with the BC ecosystem will follow a standard format for reporting which will be supported by the technology systems developed in line with the GRM framework.

#### **Customer grievances:**

Month	Total number of grievance received	Total number of grievances resolved	Grievances resolved within the specified time

<b>Quarter Total</b>			
----------------------	--	--	--

**Agent grievances:**

Month	Total number of grievance received	Total number of grievances resolved	Grievances resolved within the specified time
<b>Quarter Total</b>			

As per the above reporting format, banks will need to report the total number of grievances received through the GRM system of various CBCs and how many grievances have been resolved. Banks will also need to report the number of grievances resolved within the specified time which will indicate the overall efficiency of banks in resolution of grievances w.r.t the BC ecosystem.

Banks will also share a detailed breakdown of the escalated grievances which can be used as a detailed level view for all the stakeholders. The grievances will be reported by levels of escalation as defined in the previous section. The levels of escalation will also be relevant for the banks as they have been defined on the basis of repeated non-provision of resolution. These figures will be relevant for CBCs as well as the BCFI in understanding the relative performance of different banks. The detailed format is as below:

**Detailed breakdown of grievances**

Month	Escalated Grievances	Count	
<b>Month wise data</b>	<b>Resolved</b>		
	Level 1 Escalation		
	Level 2 Escalation		
	Level 3 Escalation		
	<b>Pending resolution</b>		
	Level 1 Escalation		
	Level 2 Escalation		
	Level 3 Escalation		
	<b>Quarter Total</b>	<b>Resolved</b>	
		Level 1 Escalation	
Level 2 Escalation			
Level 3 Escalation			
<b>Pending resolution</b>			
Level 1 Escalation			
Level 2 Escalation			
Level 3 Escalation			

*(For escalation definition of levels, please refer section 6.4.3.3.26.4.3.3.2)*



#### 6.6.3.4. *Quarterly meeting of members from CBC organizations*

Members from various CBC organizations will be required to meet once every quarter to discuss various generic and CBC specific issues pertaining to GRM in the BC ecosystem. There could be participation from government bodies, department of financial services, financial inclusion teams from banks as well wherein they can report any challenges observed by them or reported to them. The aggregate data for all CBCs combined will be shared with all the members which can be used to assess the major categories of grievances. The following will be key areas to be reviewed on a quarterly basis:

- **Common challenges faced by customers and ABCs:** Major challenges faced by customers and ABCs will be discussed wherein challenges requiring intervention by the banks, regulators and CBCs could be discussed.
- **Identification of best practices:** Leading CBCs on various aspects of GRM as identified by the quarterly reporting will help in making the quarterly reviews a platform for other CBCs to learn the best practices and implement the same. Such best practices could improve the whole ecosystem in terms of grievance redressal.
- **Continuous improvement in the GRM process:** Customer preferences, regulatory landscape, technology and various external factors will be subject to continuous change. Such changes will also necessitate the GRM processes to be in line with the external factors. The quarterly meeting of the members could serve as a platform for regular review and update of the GRM process.
- **Performance of external parties in the whole GRM process:** The performance of external parties such as NPCI, Banks, TSPs, etc. will be discussed to understand the most common challenges. Members from various CBC organizations could also share specific details about their operations with different banks which could be used by other members for streamlining processes with their respective banks. Common challenges faced all CBCs w.r.t. banks and other third parties could also be discussed which will help either CBCs or BCFI to pursue such challenges collectively.

#### 6.6.3.5. *Publication of Grievance Performance Report*

BCFI will publish Grievance Performance Report on a monthly basis to highlight the performance of the ecosystem and provide an update to all stakeholders in the ecosystem. The report will cover the following key areas:

- **Performance of BC ecosystem in GRM:** The overall performance of the BC ecosystem will be reported at an aggregate level in terms of the total grievances received, total grievances resolved, total grievances resolved within SLA and total outstanding grievances.
- **Best practices in BC ecosystem:** The report will highlight the best practices identified in the BC ecosystem which can be considered for adoption by other CBCs.
- **Achievement of CBCs and adherence to KPIs:** The report will highlight the achievement of various CBC organizations who performed well in providing resolution to customers. A ranking can also be provided in terms of the CBCs who have done well in resolving customer grievances.
- **Customer challenges:** The report will highlight the key challenges faced by customers and potential ways to solve them as discovered in the quarterly meetings.

- **Targets for the BC ecosystem:** The report will contain the targets as set during the quarterly reviews for improving the GRM process.

As it will not be possible to have participation from all strata of the BC ecosystem in the monthly review, the report will be sent to all managerial level staff in the CBC organizations as it can bolster the GRM system at ground level in all organizations and keep everyone updated. Team at BCFI will undertake the responsibility of sending the reports to all CBC managerial staff and ensure a two-way communication is established in which all recipients will be encouraged to provide inputs for the subsequent quarterly reviews. In case of technical limitations of sending the report to all staff, a link to the latest reports could also be displayed on the CBC portals for managerial staff.

## ***6.7. Stakeholders and their responsibilities***

There are multiple stakeholders in the entire customer GRM process and they all must fulfill their respective set of responsibilities to ensure smooth functioning of the process. The details of various stakeholders along with their roles and responsibilities in the process are as under:

Stakeholder	Role	Responsibilities
<b>Customer</b>	Customers are an important stakeholder in the process and play a key role in initiation, closure and escalation of grievances	<ul style="list-style-type: none"> <li>• Register grievances within defined timeframe of incidents</li> <li>• Track the status of grievances, escalate if required</li> <li>• Check adequate resolution of grievances, reopen grievance within stipulated time</li> </ul>
<b>ABC</b>	ABCs are the first point of contact for customers and contribute in the overall GRM process	<ul style="list-style-type: none"> <li>• Develop thorough understanding of GRM processes, communicate the same to customers upon enquiry</li> <li>• Support customers in all stages of GRM process</li> <li>• Raise own grievances within defined timeframe of incidents</li> </ul>
<b>CBC</b>	CBCs play an important role in ensuring all grievances are duly addressed without escalations. They also need to ensure compliance with various policies as outlined	<ul style="list-style-type: none"> <li>• Ensure adherence to GRM framework in terms of resolving grievances within SLAs, mapping internal stakeholders to the process, address escalations in time</li> <li>• Regularly run awareness campaigns for both ABCs and customers</li> <li>• Support broader initiatives for the BC ecosystem through quarterly reviews, sharing best practices, customer issues etc. proactively</li> </ul>
<b>BCFI</b>	To constitute a cell for managing helpline, escalations with oversight from senior management.	<ul style="list-style-type: none"> <li>• Ensure monitoring and compliance of GRM initiatives</li> <li>• Manage its own helpline and manage resolution of grievances</li> <li>• Coordinate with CBCs for quarterly reviews and ensure proper reporting</li> <li>• Coordinate with external stakeholders for resolution of industry challenges</li> </ul>
<b>External Stakeholders</b>	External entities such as Banks, third party vendors need to ensure they comply with the policies and SLAs laid out in the framework	<ul style="list-style-type: none"> <li>• Map stakeholders to respective CBCs for smooth functioning of GRM process</li> <li>• Ensure resolution of customer grievances within SLAs</li> <li>• Ensure timely reporting related to customer GRM</li> <li>• Participate in quarterly reviews and other initiatives for BC ecosystem</li> </ul>

## ***6.8. Escalation Mechanism***

### ***6.8.1. Automatic escalation to BCFI from the portal***

As discussed in the previous sections, level 2 and above escalations will be automatically sent to BCFI. The role of BCFI will be to constantly monitor the incidence of escalations for various CBC organizations. As discussed in the previous sections, BCFI will be able to track escalations which have the involvement of external stakeholders. High incidence of escalations involving external stakeholders will allow for direct escalation to the senior management in external stakeholders such as Banks.

The presence of automatic escalation mechanism to BCFI will also be helpful in sending detailed report to CBC organizations when the incidence of escalations becomes high. Once the system becomes operational, baseline levels for escalations can be ascertained till which the internal mechanisms in the CBC organizations will be able to comfortably resolve the grievances. In cases where the baseline levels are breached, interventions could be made by BCFI and inputs could be sought from other CBC organizations to tackle the increase in escalations.

### ***6.8.2. Manual escalation to BCFI from customers and ABCs***

In addition to the automatic escalation mechanism built in the system, there will be additional channels to escalate grievances to the BCFI. However, some caution will be required to avoid duplication of escalations as a major chunk of the escalations will be already captured in the system. Another important consideration will be that the role of BCFI will be limited to coordination with stakeholders in the CBC organizations and third parties. Members from the grievance redressal team at the BCFI will be required to exercise judgement on accepting escalations and grievances as reported by customers/ABCs. There will be an additional layer involving senior stakeholders from BCFI to whom grievances and escalations not admitted by the grievance redressal team can be sent for review by the customers and agents. There will be a dedicated helpline at BCFI along with an email address. The detailed guidelines for escalations to BCFI will also be published on the portal. Below are some of the categories of grievances and escalations which will be eligible for admission by the BCFI:

**Severity of grievance:** In cases where the grievances do not fall in the pre-defined categories on the GRM portal and the established processes will not be able to facilitate urgent intervention. The appropriateness of such cases will be determined by the grievance redressal team at the BCFI.

**Financial irregularities or misconduct by ABC or CBC:** In cases involving misconduct or financial irregularities by either the CBCs or ABCs, there could a possibility that customer/ABC perception towards the GRM portal will be diminished and customers/ABCs might expect an independent third party to provide resolution.

**Inadequate support from helpline:** In cases where the customers/ABCs are refused support from the helpline or the status of their grievance is not communicated, the BCFI can be approached.

**Inadequate resolution of grievances after the first round of escalation:** In cases where customers/agents are still not be satisfied with the resolution provided after escalation, escalation can be done to the BCFI.

## ***6.9. Reporting to RBI and banks (specific to their complaints)***

As a standard procedure, banks will be sent a notification in cases having dependency on banks for resolution of grievances. All the level 2 escalations will be automatically triggered to be sent to the banks. The details of grievances which will be sent to the banks are as below:

Unique Grievance ID	Customer Name	Customer Account Details	Grievance Code	Grievance Description	Level of escalation (Level 2 and above)	SLA as per category	Assigned Official (Within CBC)

The official tagged within the CBC organization will follow up with their point of contact in the bank for follow up. As a procedure, the details of all the escalations could be sent to senior management of the banks.

## ***7. GRM Technology Framework***

This view of the architecture elaborates various technological components of the envisaged solution. The components have been identified based on the self-sustainable working of the system and requirement of scale up and scale down as per requirements at any given point of time. Overall envisaged technology platform will comprise a set of applications and services that are expected to be rendered through a typical multi-tier architecture. A number of services will be hosted for external as well as internal usage. This is proposed to manage internal functioning and business rules along with serving the customers and ABCs as primary stakeholders. A host of external services through content, data and application level integration will also be rendered to the customers, employees, banks, regulators, management teams and other stakeholders. Following sections describe the conceptual view of the overall architecture.

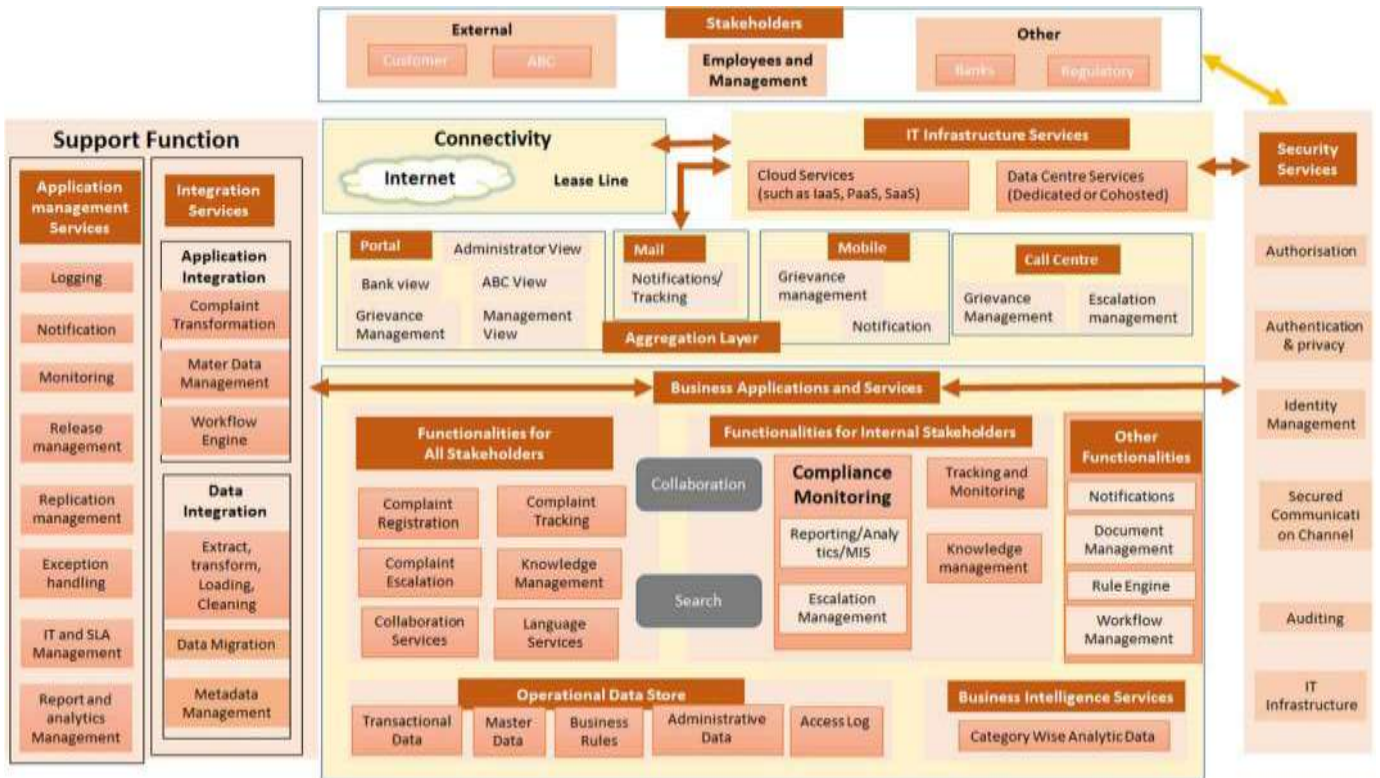


Figure 4: Proposed Technology Architecture

## 7.1. Information Dissemination/Rendering Services

Content and transactions will be rendered through a number of channels such as web portal, call center, mobile application and messages. A device aggregation layer should be planned to make the service delivery device independent.

**Portal:** The portal will provide a platform to each stakeholder for delivery of requisite services and act as a primary gateway for them. The customer will have access to grievance logging and tracking services whereas banks/CBCs/third parties will get a unified view of reports, escalations and grievance resolution views. Separate views and instances of applications will be provided through typical portal application.

Portal will be exposed to both enterprise application and a number of functional applications. The portal should therefore operate through an appropriate parser that is able to render a broad number of services while connected to the portal. Each response request in the portal should be well integrated with the parsing application. The parser application and infrastructure is expected to form a key component of solution design.

User based views should be modularized and customizable to a significant extent. These customizations will be driven by business process and logic.

## 7.2. IT Infrastructure Services

The relevant IT infrastructure mechanism has to be integrated so as to offer seamless user experience for any of the modes. For this purpose, infrastructure hosting can leverage cloud service offerings. The compute & storage requirements may be scaled (up or down) over a period in line with load requirements. The applications architecture will be designed to leverage cloud characteristics such as rapid elasticity and ability to handle transient and hardware failures without downtime. In addition to the production environment, provision for the development, test, and training environments on the cloud infrastructure may be done. The testing of the integrated solution should be carried on a test environment that is a miniature version of the production environment.

---

## 7.3. System Management Services

IT Services comprise two broad set of service suites:

- a) Security Services:** Standard authentication and authorization services, application registration capabilities, and other pertinent details.
- b) Application Management Services:** Along with the set of services provided in a typical application server environment such as notification, logging, release management, etc., typical IT and SLA management services in terms of response times and other parameters as well as some application monitoring dashboards are envisaged to be a part of these services.

## 7.4. Business Applications and Services

This may be broadly divided into two categories:

**a) Business Applications:** The core business applications will be running on cloud services - availed or hosted in-house, depending on the requirements and architecture design. The applications will be accessible to all the stakeholders with different levels of access via channels of information dissemination through defined integration touch points. It is critical to capture the grievances coming through multiple channels and elimination of duplicates for easier work load management and a focused approach. Considering this, internal applications will also need to have data and application level footprints. Data and application logic will completely reside on the respective environments. Specific data level integration requirements will be chalked out.

The primary applications will be

1. Complaint Registration
2. Complaint Tracking
3. Complaint Escalation
4. Knowledge Management – The KM portal will contain various documents and information about grievances raised till date. This will have two basic sub parts:
  - Repository of information and documents available to customers/ABCs
  - Information and documents only available to employees and management
5. Collaboration Services – Services which are not necessarily owned by the portal. Instead these services may be borrowed from other portals or applications.
6. Search –Allows users to search for a specific service in the portal, instead of trying to navigate to the link for that particular service.
7. Personalization – Allows the users to personalize the web pages and save favorite links etc.

**b) Internal Applications:** Hosted enterprise application suite is expected to manage the internal operations and business logic. Typical areas of operation will be generation of various MIS reports, automated tracking of various compliance deadlines (including on time submission of data), escalation management, etc. All these applications will have tightly coupled integration with the data layer. Internal applications will also include a master data management module to add/delete/modify and manage all key master entities including the hierarchy and roles management.

## 7.5. Application Design/Integration Services

This set of services comprises three categories-

### a) Services Design and Maintenance Platform

An integrated development environment providing an interface to maintain services based on the relevant development framework. The interface will be used to modify and manage the changes in the services description and definition. A typical environment will also contain workflow and rules management engine to provide the ability to design configurable services.

### b) Data Integration

Data will reside in multiple repositories of the platform. Some of the data assets might also reside outside the platform in the database of specific application provider. A concerted data management strategy will



be required to be designed. Typical online and offline data integration model will be considered as part of the overall technology solution stack.

**c) Data Stores**

Overall application layer will have multiple data stores in two different variations:

- a) Data stores within controlled environment: Complete control and direct access to the data being logged/created out of proprietary applications.
- b) Data store in application provider’s environment: Data will be managed by the respective environment owner.

Each application is envisaged to have a dedicated operational data store. From here, an integrated data store providing a 360 degree view of customer and sales information is envisaged as part of this architecture. This data store is expected to receive synchronized and asynchronous feeds from multiple services and applications through an integrated information hub.

## 7.6. Business Intelligence Services

All business rules pertaining to workflow management including but not limited to auto closure, escalation, etc. will be handled and governed by this. Data intelligence services will be updated in real time to enable adaptation to changing environment and queries.

## 7.7. Proposed Technology Options

Various proposed technological options at each layer are listed below. Combination of these technologies may be adapted to address the final architectural requirements:

<b>S No.</b>	<b>Layer</b>	<b>Technology Option</b>
1	Presentation Technologies	AJAX, Silverlight, Crystal Reports, CSS, iOS, Android
2	Development/Application Platform	.Net, Java, Jboss, Office SharePoint, PHP, Websphere
3	Database System	Oracle, SQL server, MySQL, MongoDB, CouchDB
4	Operating System	Windows, Unix, Linux
5	Cloud	Windows Azure, Amazon Web Services
6	Integration Services	SoA, Rest API, JASON, XML
7	Standalone Applications	Qualtrics, HappyFox, NABD, Newgen, ActPlease.com

## 8. GRM management post implementation

After the implementation of GRM is completed with full scale roll out of the GRM framework and its supporting technology systems by one or more CBCs, the GRM operations will be considered to have entered the post implementation phase. In the post implementation operations, it will be ensured that the GRM processes are stabilized and are run in accordance with the finalized framework. The details on various aspects of the post implementation operations are discussed in the subsequent sub-sections.

### 8.1. Governance structure

The BCFI will play a major role in ensuring that the GRM operations are run smoothly in the post implementation operations. The BCFI will coordinate with various stakeholders to ensure adherence to SLAs and timelines as discussed in the previous sections. The role of each of the stakeholders is as below:

Stakeholder	Responsibility
BCFI	<ul style="list-style-type: none"> <li>• Ensure adherence to SLAs for all the grievances by regular monitoring and coordination with multiple stakeholders</li> <li>• Monitor technical and functional performance of the GRM portal and Call Logger</li> <li>• Ensure regular flow of grievance related data to senior stakeholders in the proposed body, CBC Organizations, third parties including banks and regulators</li> <li>• Coordinate in quarterly reviews as discussed in the previous sections</li> <li>• Publication of regular performance reports on GRM in the BC ecosystem</li> <li>• Manage the process of incorporating changes/updates in the GRM systems and processes</li> <li>• Manage the process of developing quality standards for the BC ecosystem</li> </ul>

CBC	<ul style="list-style-type: none"> <li>• Senior stakeholders from various CBC organizations to ensure performance of their respective organizations on various parameters as discussed in the previous sections</li> <li>• Designated stakeholders to participate in the quarterly reviews</li> <li>• Introduce quality standards in their operations</li> </ul>
Implementation vendor organization	<ul style="list-style-type: none"> <li>• Adhere to technical and functional SLAs of the GRM platform</li> <li>• Provide support staff for post implementation support</li> <li>• Incorporate updates/modifications in the system as per SLAs</li> </ul>
Banks and third parties	<ul style="list-style-type: none"> <li>• Adhere to the SLAs for grievances requiring resolution from them</li> <li>• Participate in the quarterly reviews to support improvement in the overall GRM processes</li> <li>• Provide additional support to customers/ABCs</li> </ul>

## 8.2. Support and maintenance

As discussed in the previous sections, the portal will require support and maintenance which shall be carried out by the implementation vendor or any other third party depending on the specifics of the contract. A dedicated technical support team will be set up for supporting on all aspects related to technology.

The details on various aspects of support and maintenance activities are as under:

- **Adherence to SLAs and timelines:** The technical support team will be required to adhere to timelines for all technical issues related to the portal.
- **Information on planned downtimes:** The technical support team will be required to provide information on planned downtimes in advance to all the stakeholders. In case of any delays, the team will be required to provide periodic updates on the tentative resolution time.
- **Process and system updates:** The technical support team or any other team constituted as per the contract will be required to carry out process and system related updates as per the timelines.

## 8.3. Process review and updates

As outlined in the one of the previous section on continuous improvement and changes in the GRM processes and systems, two categories of changes were specific to GRM processes viz. change in operational parameters and change in GRM process. The primary ownership of initiating, getting approval of such changes and implementation of these changes will rest with the BCFI. All the review/updates will be done after consultation with stakeholders as defined in the previous sections.

## 8.4. Technology systems upgradation

For any changes specific to the technology stack as outlined in the previous section on continuous changes in the GRM processes and systems, the BCFI will have the ownership of the entire process. There will be involvement on the technology support team or any other team as defined in the contract with the technology implementation vendor. All such changes will be done subject to consultation with all the changes as defined in the previous section.

## 9. Annexure

This section contains the additional GRM components which will be an important feature of the GRM portal.

### 9.1. Awareness initiatives for GRM

Multiple modes will be used to disseminate information to customers on registering grievances such as through the ABC, CBC website, posters at CBC outlets, SMS, email and other relevant modes that evolve in the future.

Following points need to be considered for ensuring that all stakeholders benefit from the awareness initiatives:

- **Availability in multiple languages:** The information on GRM process will be made available in multiple languages across various channels to ensure all segments of customers and ABCs are able to access the content.
- **Consistency across channels:** Communication of GRM framework will be consistent across all channels to ensure greater clarity among all stakeholders.
- **Frequency:** Communication on customer GRM to be done at regular intervals. For other cases such as bank branches, CBC outlets, portal, etc., the information will be made accessible at all times.
- **Mandatory training for ABCs at the time of enrolment:** ABCs will be required to complete an online training on the portal at the time of registering.
- **Refresher trainings for ABCs:** Regular trainings on feature updates of the portal will be pushed for ABCs and stakeholders in various entities. In cases of failure to complete those trainings, access to the portal will be temporarily disabled.
- **Regular meeting for ABCs:** There will be regular meeting between stakeholders from CBC organizations and their ABCs wherein the ABCs will be updated on services, products and features. There will be tracking by CBCs wherein the ABCs will update the frequency of trainings in the system which will help in tracking such initiatives by various CBC organizations.

The modalities associated with each channel for communication are as below:

- **ABC:** The ABCs will be required to carry an information manual always, containing details on the GRM process. ABCs should also be fully aware of the process to verbally communicate the same to the customers.
- **CBC:** CBC offices will be required to have information manuals on customer GRM at their office locations. All the employees will be required to be well versed with the entire customer GRM process. CBCs will be required to conduct regular training for ABCs to ensure they are fully aware of the process. Sessions will be conducted for customers as well.
- **SMS:** Regular SMSs will be sent to customers informing them about the customer GRM and on how they can know more about it through ABCs, GRM portal and CBCs.
- **Emails:** Customers who have registered their email ID with the CBC will receive regular emails on the customer GRM process.

### 9.2. Oversight by government bodies and third parties

In addition to the oversight by BCFI, senior stakeholders from CBC organizations and banks, additional stakeholders such as district magistrates, self-help groups, state level bankers' committee, block development officers etc. will support the customer needs of across different regions. These stakeholders will also be able to register grievances through various channels (listed in the previous sections) and check the proper implementation of all the GRM processes as the framework. The communication sent to customers and ABCs will

also include the details of these stakeholders for escalation of grievances in case of inadequate resolution. All the external agencies will be required to register grievances on the CBCs GRM portal through any of the modes as discussed in the previous sections to ensure that grievances are trackable. For following up with different stakeholders or to expedite certain category of grievance, the unique grievance ID can be used for reference.

The aforementioned government bodies will have a greater role on a state/regional level depending on the area under their purview. In addition to these bodies, there are other entities in the ecosystem such as Department of Financial Services (DFS), the office of Pradhan Mantri Jan-Dhan Yojna (PMJDY) and Financial Inclusion BC operations in banks which can also support smooth functioning of the BC operations. These entities can also register grievances on the GRM portal and follow up the status of grievances already registered using the unique grievance ID.

The benefit of using a portal built on a consistent framework will also help these entities in tracking the status of grievances with the help of unique grievance ID. The existence of a unique grievance ID will also support the existing channels used by these entities for resolving and expediting the resolution of grievances.

### ***9.3. Continuous improvement and changes in GRM processes and systems***

As outlined in the previous sections, various aspects related to the GRM process will be reviewed by each of the stakeholders on a regular basis and the challenges related to the proper execution will be identified. Also, the GRM process will be subject to continuous improvements through the insights that may be generated during regular connects with the stakeholders from CBCs, BCFI and other entities. The changes to the GRM process will also include enhancements to the underlying technology platform, requiring proper classification of changes and the associated process.

The category of changes to the GRM process is as under:

- **Change in operational parameters:** Changes that do not require modification or enhancements in the underlying technology, but cover the operational details like categories / SLAs etc., will be included under this category. The list will comprise of:
  - Addition/Modification of grievance categories
  - Changes to SLAs and timelines for different categories of grievances
  - Modification of list of recipients for escalations
- **Change in GRM process:** Changes to the underlying GRM process which may or may not require changes to the underlying technology systems and processes, will be included under this category. The list will comprise of:
  - Changes to any process or sub-processes in the GRM
  - Additions/deletions of any process or sub-process in the GRM
- **Incorporation of emerging technologies:** This category will include changes/additions to the technology stack of existing GRM portal to incorporate emerging technologies such as Big Data Analytics, Machine Learning etc. in the GRM process.

All the changes will require consent of each of the stakeholders from - various CBC organizations, BCFI and external entities like banks, etc. The BCFI will be responsible for initiating such requests, facilitating discussions/review with each of the stakeholders and implementation of the changes.

### **9.3.1. Introduction of quality standards**

The periodic reporting by CBCs will be analyzed on various parameters to converge onto the performance gaps. Once the new standardized GRM process is established across the BC ecosystem and operations are stabilized, quality standards will be set for the ecosystem.

Quality standards such as ISO 9001:2015 can be established for the BC ecosystem, which will further help in strengthening the GRM process. Various CBCs can then be encouraged to get certifications on the developed standards.

## **9.4. BCFIs role in GRM**

The BCFI mentioned in various sections of the document will play an active role in the overall GRM process. The Industry Body will be vested with various responsibilities for ensuring smooth functioning of the GRM process. It will act as an independent third party and will ensure that customers and ABCs receive adequate and timely support for all grievances.

### **9.4.1. GRM governance structure**

The proposed body will comprise of different entities, which will be mapped to the end to end GRM process. The details of various entities to be established are as under:

- **Grievance redressal cell:** The primary objective of this team will be to ensure the functioning of GRM process in the BC ecosystem as envisaged in the framework.
- **Supervisory council:** The objective of this council will be to oversee and manage the grievance redressal cell. The council will have representation from middle management of the proposed body.
- **GRM Committee:** The objective of the GRM committee will be to steer the entire GRM process at a strategic level with stakeholders from the BC ecosystem. The committee will have representation from senior management of the proposed body.

### **9.4.2. Responsibilities of team in BCFI**

All the aforementioned teams will work in synchronization to ensure that the proposed body plays its role in the process. All the activities mentioned in the previous and subsequent sections of the report, with reference to the proposed body, will be undertaken by the grievance redressal cell. The role of Supervisory council and GRM committee will be to ensure the success of the program through constant reviews. The key collective responsibilities of the team(s) will be as under:

- Monitor the overall adherence of various CBCs to the GRM process as defined in the framework
- Maintenance of Call logger for registering escalations
- Resolution of escalated grievances within the stipulated timelines
- Coordinate with CBCs and external stakeholders for timely reporting of grievance data
- Coordinate with multiple stakeholders for conducting regular review meetings
- Publication of quarterly report on GRM within the stipulated timeline
- Ownership of initiating and monitoring the technology changes/updates to the GRM portal of all CBCs



**Business Correspondent Federation of India**

F-5, Ground Floor, Kailash Colony,

Greater Kailash Part 1,

New Delhi - 110048.

INDIA

Phone - 91-11-4173-0252

Email: [contact@bcfi.org.in](mailto:contact@bcfi.org.in)



