



Consumer Grievance Management Procedure 2020

Foreword

National Pension and Provident Fund (NPPF) is committed to providing high quality and value for money services to our members and clients. The very existence of NPPF is because of the presence of our members and clients and therefore, each one of us in NPPF. Therefore, satisfying the expectations of our members and customers should be at our heart while delivering services. However, there could be occasions, where our services have not met customer's expectations. Therefore, it is essential to have a system where our clients could provide their feedbacks on our services and products.

This customer grievance management procedure is to give members and customers the platform to provide their valuable feedbacks or suggestions on our products and services. These procedures and processes are intended to record customer's feedbacks/suggestions and analyze for handling them for enhancing NPPF's services.

All feedbacks on NPPF should be given due considerations in an equitable, objective and timely manner.

The redressal system should be reviewed whenever necessary by the Consumer Protection Unit and approved by the management. The CEO shall be responsible for implementation of this procedure.


(Dungtu Drukpa)
Chief Executive Officer

01/03/2021

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Abbreviations	Full Form
CPFSRR	Consumer Protection for Financial Services Rules and Regulations
CPU	Consumer Protection Unit (CPU)
CGMP	Customer Grievance Management Procedure
NPPF	National Pension and Provident Fund
SRR	Service Rules & Regulations
RMA	Royal Monetary Authority of Bhutan

1. Introduction:

In order to effectively implement the Consumer Protection for Financial Services Rules and Regulations (CPFSRR) 2019, a standard operation procedure is framed to handle consumer grievances within the NPPF. The management has created Consumer Protection Unit (CPU) in order to enforce the CPFSRR 2019 and manage the complaints as per the provisions of the said regulations.

2. Definitions:

2.1. Grievance/Complaint.

Any communication that causes dissatisfaction, in respect of the conduct or any act of omission or commission or deficiency of service by a customer availing the services from any NPPF offices and intermediaries. The communication can be through formal written letter, email or other electronic scripts against the services of NPPF including Regional offices' Services. The complaint should seek remedial action but exclude following: -

- (i) Complaints that are incomplete or broad in nature;
- (ii) Communication seeking guidance or explanation; and
- (iii) Compliant(s) of vindictive nature.

2.2. Inquiry

An inquiry is any communication made by the customer to find out about the organization's products/services or confirmation on publicly available information about the organization like financial reports, circulars, notifications etc.



2.3. Request

A communication from the customer requesting for service such as a change or amendment in the individual policies/accounts/personal information maintained with the NPPF.

2.4. Grievance Officer

An appointed official(s) of the organization to whom the grievances/complaints are forwarded. The Grievance officer shall ensure that the issues received are attended to by the relevant business lines or any other relevant person within the approved timelines.

2.5. Complainant

Refers to the aggrieved consumer/Customer/Member making a complaint with regard to financial products and services provided by the NPPF.

2.6 Consumer/Customer/Member

Refers to a person or an entity that uses, has used or is a potential user of financial products or services of NPPF.

3. Principles:

The Customer Grievance Management Procedure, 2020 (CGMP) has been developed to enhance customer satisfaction and based on the following principles:

- 3.1 Implement effective and impartial consumer protection mechanism;
- 3.2 Promote self-regulation within NPPF;
- 3.3 Establish and harmonize financial consumer protection practices;
- 3.4 fair market conduct and business practices;
- 3.5 Implement an effective and impartial dispute resolution and redress mechanism; and
- 3.6 Promote financial consumer education and disclosure for consumers to make effective and informed financial decision.

4. Objectives:

- 4.1 Customers are treated fairly at all times;

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4.2 Complaints raised by customers are dealt with courtesy and in a timely manner;

4.3 Customers are informed of avenues to escalate their complaints within the organization, and their rights if they are not satisfied with the resolution of their complaints;

4.4 The employees work in good faith and without prejudice, towards the interests of the customers; and

4.5 NPPF will handle all complaints efficiently and fairly as they can damage the organization's reputation and business, if not address appropriately on time.

5. Interpretation

The Grievance Committee shall have the final authority to interpret the provisions of this procedure

6. Scope

This procedure shall apply to all grievances related to NPPF's services received from its members and customers.

7. Mode of Filing Grievances

7.1 Written Grievance

Customers are encouraged to file the grievances, feedback and suggestions in writing using NPPF's grievance form attached as Annexure 1.

Written grievance can be sent to the Chief of Customer Care Centre at the NPPF Head Office, Thimphu or to the Regional Head (s) of the Regional Offices at Gelephu, Mongar, Phuentsholing and Samdrup Jongkhar.

7.2 Grievance by Telephone

Verbal grievance can be lodged via NPPF's Toll Free No. 1039. NPPF will maintain a record of the verbal grievances in the format attached in Annexure 2.



7.3 Web Page

Customers can lodge grievances through NPPF's website www.nppf.org.bt.

7.4 E-mail

Customers can lodge grievances by writing to NPPF at customercare@nppf.org.bt

7.5 Notwithstanding subsection 7.1 till 7.4, anonymous grievances shall not be considered for analysis and official reporting.

8. Mandatory display requirements

NPPF shall arrange to display information on the following aspects:

8.1 Appropriate arrangement for receiving complaints and suggestions;

8.2 The name, address and contact number of Complaints handling officer;

8.3 These provisions would be prominently displayed in all branches and Head office premises; and

8.4 The complaints/suggestions/feedback forms shall be made available at the customer help desk and regional offices.

9. Essentials to be followed while handling Customer Complaints :

9.1 Transparency: The customer should be provided with complete information about the channels they can access to service their requirements and resolve their issues. The total likely time that may be required to resolve any issues pointed out by the customer should be clearly communicated to the customer.

9.2 Accessibility: NPPF shall enable the customers to make the complaints through multiple available channels (like the Customer care, Regional offices, emails etc).



9.3 Escalation: In cases where the customer is not satisfied with the resolution of the complaint at the level he has submitted, information on the process of escalation of complaints should be made available on the customer-facing areas and other media channels.

9.4 Educate the customers: NPPF should make continuous efforts to educate its customers to enable them to make the right choices regarding its products and services, and avoid making errors in the transactions related to all services rendered to its customers.

9.5 Review: NPPF shall have in place a review mechanism where all customer grievances are addressed in an appropriate manner and take a proactive approach to addressing such issues.

10. Resolving Customer Complaints :

10.1 The concerned front-facing staff are responsible to handle complaints to the best of their capability. However, all employees are encouraged to deal with a verbal complaint as soon as a customer mentions his dissatisfaction, and each of these should be resolved immediately where possible. Complaints which cannot be resolved by the concerned front-facing staff should be forwarded to the customer care chief as per the stipulated timeline under Section 13.

10.2 A clear distinction must be made between complaints, that allege financial loss, material distress and material inconvenience, and complaints arising from a minor error, which can be remedied promptly. As soon as a customer makes a complaint, it should be immediately noted in the complaint logbook/ excel sheet for record and future reference and forwarded to the Consumer Protection Unit on a monthly basis (Annexure C)

11. Channel for acknowledging Grievances

An acknowledgement for receipt of grievance shall be sent to the customer through e-mail by NPPF employee and in absence of e-mail address, the complainant shall be notified through phone about receipt of the same. However, proper recording keeping has to be maintained for such acknowledgement.

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12. Time Frame for Grievance Redressal

12.1 NPPF shall endeavor to settle the complaints within 48 working days (maximum) after receipt of the complaint. In case a grievance cannot be resolved within the stipulated time frame, the customer should be informed about the reasons as to why more time is needed to redress the grievance.

12.2 In the event of the need for multiple FSP's involvement in resolving a case, additional 20 working days (maximum) as turnaround time to revert the case to the NPPF. However, any exceptional cases, that may require more than the above stipulated time to resolve the complaint, will require separate time extension approval from the RMA.

13. Escalation of Grievances and Appellate Authority

13.1 Customer Service Division/Regional Offices:

- a) The regional office and Customer Care Division shall strictly comply with the escalation of grievances as per the redressal flow chart in Section 21.
- b) The Customer Service Division/Regional Offices will act as the first point to receive any complaints.
- c) The receipt of customer's compliant acknowledgement shall be done immediately.
- d) Ensure that the customer compliant received, attended and solved within 5 working days;
- e) Inform closure of the compliant received from the customer within the above stipulated timeline in sub section (d).
- f) In case if the complaint/case cannot be closed/solved because of the seriousness of case or need the attention/ intervention of concerned departments, the Customer Care Division/Regional Office has to escalate the case to Consumer Protection Unit within 5 working days.

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13.2 Consumer Protection Unit

The grievances which could not be resolved by the regional offices and customer service division shall be directed to the Consumer Protection Unit. The Consumer Protection Unit main responsibilities are:

- a. Ensure compliance to the provisions of policies/ SoPs of the business lines;
- b. Investigate the complaint(s) within the approved SoPs of the Department or collaboration with the concerned department or escalate the complaint to the concerned department to solve the case and provide optimum solution to the customer within 10 working days from the receipt of the complaint(s);
- c. Escalate the unresolved complaint(s) to the Grievance Committee within 8 working days after receipt of the complaint(s); and
- d. Provide feedbacks and circulate learnings emerged from the experiences.

14. Analysis and Evaluation of Grievances

All grievances shall be subject to analysis and reporting. Therefore, NPPF including Regional Offices shall maintain records of grievances and action taken to address grievances.

Weekly report of grievances received and action taken by Customer Care Center and Regional Offices shall be forwarded to Consumer Protection Unit. The Consumer Protection Unit shall analyze and classify the nature of grievances and submit the report to the Grievance Committee every 90 days.

15. Grievance Committee

The following officials shall constitute the Grievance Committee:

- Chief Executive Officer, Chairman
- Director, Operations Department
- Chief, Pension and PF Division
- Chief, Member Loan Division
- Chief, Customer Care Division
- Chief, Finance and Accounts



- Chief, Human Resource Division
- Chief, Legal Division
- Consumer Protection officer, Member Secretary

15.1. Roles and responsibilities of the Grievance committee:

- Monitoring of the grievance management;
- Review and take decisions/ resolution on the grievance which could not resolved by Consumer Protection Unit within 20 days.
- Review and analysis report which are not resolved by Customer care Division/ Regional Offices.
- Conduct inquiry, mediation and investigation on the grievances;
- Provide feedback and recommendations to the department or division concerned for improvement or remedy; and
- Ensure customer service procedures are followed by employees of NPPF.
- Periodically review the pending grievances and determine the key causes of the grievances.
- Review and approve proposed actionable strategies to improve customer services;
- Advise Grievance Officer on the closure of grievances;
- The Grievance Officer of the organization shall convene the meeting of the Grievance Committee, share data of the complaint(s) and maintain a complaint(s) logbook.
- If the customer is not satisfied with redressal outcomes provided by committee, the consumers may refer the complaint to the RMA within 30 days (maximum) of the outcome of the assessment by the NPPF. The Grievance Officer shall inform the client on the rights of the customer to appeal to RMA within the time frame mentioned.

16. Grievance Officer:

NPPF shall have designated Grievance Officer under the Consumer Protection Unit. The appointment of the Grievance Officer shall be done by the Chief Executive Officer via an office order with detailed designation, contact numbers, etc.

16.1 Roles and Responsibilities of Grievance officer:

- Be the main bridge between Customer Protection unit and other departments;



- b) Interact with the regulators, Customer service, business lines and the grievance committee on the issues related to grievances;
- c) Guide the grievance focal from Regional and business lines to adopt better grievance redressal practices;
- d) Review the grievances and suggest actionable strategies to improve customer services;
- e) Design policies and strategies to meet the market demand (competitive and customer focused);
- f) Conduct the closure of the grievances by the Grievance Officer after discussing with relevant grievance focal; and
- g) Maintain a record of all customer grievances and submit to the Grievance Committee as per Annexure B. (AND SUBMIT THE REPORT TO RMA ON A QUATERLY BASIS AS PER THE SECTION 3.2.8 RECORDING AND REPORTING)

17. Conflict of Interest declaration

All the members are required to declare conflict of interest before every sitting. In case a grievance is made against a member of the Grievance Committee, the member will not participate in matters pertaining to the specific grievance to assure the transparency of the procedure.

18. Consequences of Non-compliances

Compliance to this procedure is intended to support with the implementation and facilitation of the CPFFG Rules, RMA 2019. NPPF staff are encouraged to abide by the NPPF's Code of Conduct (as specified in annexure 2 of 3rd SRR, Pg:83-86)

Any incidences of non-compliance to this document must be reported to the Consumer Protection Unit.

19. Confidentiality

- i. All information and personal data supplied by complainant will be used only for purposes related to the handling and/or investigation of compliant/grievance;
- ii. The NPPF may disclose or transfer the information and personal data supplied by complainant to third parties for:
 - a. the purposes related to the handling and/or investigation of compliant/grievance, including the NPPF and/or its staff who are the subject of the complaint; and



- b. where permitted or required by law or subpoenaed by court. □

20. Offence and Penalty

An offence shall be classified as major or minor. The Grievance committee shall have the power to determine the seriousness of the offence. In the imposition of penalty, the Grievance committee shall take into consideration the nature and seriousness of offence, as well as the circumstances, which either mitigate or aggravate the intention of the employee and the offence.

20.1 Minor Offence/Misconduct/Noncompliance

The listed acts shall fall under minor misconducts and any other acts which is not covered by the serious misconduct.

- a. Favoring a customer/client over the others which impact the process flow
- b. Discriminating a customer for his caste, creed, religion, region and status;
- c. Making personal comments towards the customer/consumer/Member
- d. Misusing ones position to influence the customer or client in making service related decisions.

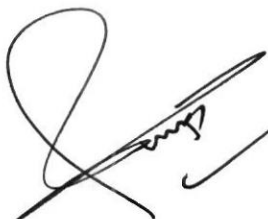
20.1.1 A minor penalty shall consist of one or a combination of actions such as

- 1. Reprimand,
- 2. Fine of an amount not exceeding one month's basic pay,
- 3. Withholding of one or two annual increments.

20.2. Major offence//Misconduct/Noncompliance

Major offence consist of serious misconduct which includes:

Fraud, theft or misuse of the NPPF's office fund or property, non-remittance/non-deposit/non-accounting of collections from customer; assault, willful insubordination or disobedience of a repeated or serious character, failure to comply with minor offence penalty, persistent absence from the workplace, sabotage, willful damage to NPPF's image , sexual harassment towards the customer, verbal abuse, repeated intoxication during working hours, repetition of similar minor offence, combinations of few minor offences.



In addition, depending on the seriousness of the offence, the Grievance Committee shall decide on the classification of the offence.

A major penalty shall consist of one or a combination of:

20.2.1. Withholding of three to five annual increments;

20.2.2. Reduction of pay below the existing pay level;

20.2.3. Withholding of promotion;

20.2.4. Withholding of performance bonus fully or partially;

20.2.5. If such case involves either a corrupt ingredient, the Grievance Committee may forward the matter to the competent authority for further course of action.

20.2.6. Compulsory retirement from service with post retirement benefit; and

20.2.7. Dismissal or termination of service without post retirement and other benefit, except one's own contribution.

20.3 An employee shall not be subjected to the penalty except by an order in writing signed by the Chairperson of the Grievance committee and no such order shall be given without a charge being framed. The employee concerned shall be given one week's time to submit written explanation. If the employee so request, the stipulated period may be extended up to a maximum of four weeks.

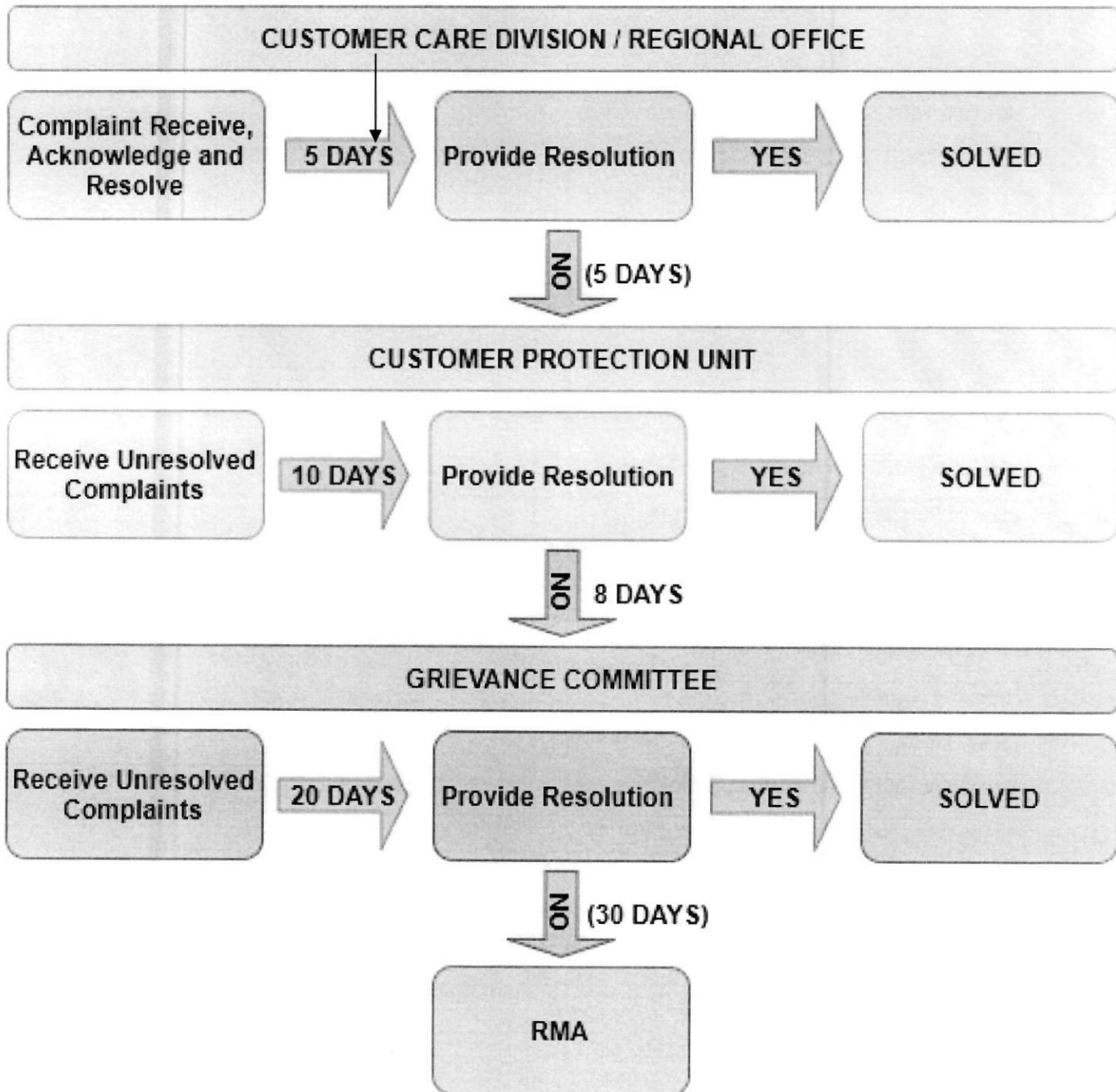
The procedure for imposing the penalty shall be as per the NPPF SRR 2018:

21. Amendment / Modification of Procedure


The procedure shall be reviewed for amendment and modification as and when required.

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22. Redressal flow chart




Annexure A : Customer complaint form

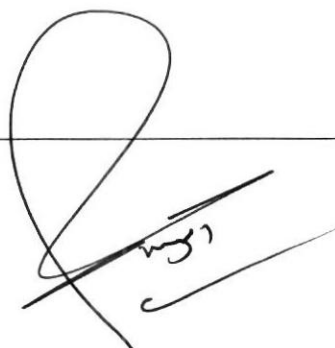
 <p style="text-align: center;">NPPF CUSTOMER GRIEVANCE MANAGEMENT PROCEDURE 2020</p>	
COMPLAINANT DETAILS	
Name of Person Lodging Complaint:	
CID:	Address :
Contact Number :	
Complaint lodging Date:	Email ID:
Complaint Details	
Date of Incident:	
Location of Incident (HQ/Branch Office):	
Please describe precisely in point form all the matters you are not satisfied with. Please describe the incident(s) giving rise to your complaint, preferably in chronological order. It will help us handle your complaint if you can provide us with relevant information such as the date, time, place, identities of the parties involved and a copy of the relevant documents.(if any)	
Complainant's Signature	
To be Filled by NPPF Customer Care Center	
Complaint reference No:	



Received on:	
COMPLAINT RECEIVED BY:	
Officer's Name:	Officer's Signature:
Complaint Resolution : <input type="checkbox"/> Resolved <input type="checkbox"/> Unresolved & forwarded to Consumer Protection Unit	
Date:	

Annexure B : Customer Complaint Form to be filled up by the Grievance officer performing the case study

 <p>NPPF CUSTOMER GRIEVANCE MANAGEMENT PROCEDURE 2020</p>
Customer Complaint Form to be filled up by the Grievance officer performing the case study
Complaint Details
Name of the officer:
Date:
Details & Findings of the case:



Remedial Actions	Recommended Date of completion
Recommended Actions to be taken :	
1.	
2.	
3.	
4.	
Remarks by Grievance officer :	
Signature	
Case Resolved <input type="checkbox"/> Yes <input type="checkbox"/> No (Forward to Grievance Committee)	
Committee Recommendation (if applicable)	Date to be completed
1.	
2.	
Remarks by Committee:	
Customer notified: <input type="checkbox"/> Yes	Date Informed :

Annexure C: Daily complaint log to be maintained by the Customer Care Center & RO

MONTHLY STATEMENT OF COMPLAINTS

For the Month:

Date:

Name of the dealing officer:



Sl. No	Name of Complainant	Date	Complaint Reference No.	Nature of Complaint	Subject matter of Complaint	Complain resolution date	HQ/ Branch	Remarks

***Nature of Complaints**

- Customer Care
- Pension and Provident Fund
- Loan and other Remittances
- Miscellaneous
- Others

