



**SBI (Mauritius) Ltd**

Bank to grow with

## Complaints Handling Policy and Procedures

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<b>Ownership</b>	<b>VP (RB) &amp; VP(C) &amp;CS</b>
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## Complaints Handling Policy and Procedures

### Table of Contents

Section	Contents	Page no
1	Introduction	3
2	Interpretations	3
3	Complaints Handling Policy and Procedures	4
4	Accessibility to Complaints Handling Policy & Procedures	4
5	Time Limit to Deal with Complaints	4
6	Investigation of Complaints by the Bank	5
7	Resources and Staff Training	5
8	Monitoring and Audit	6
9	Record Keeping	6
10	Notification to the Office of Ombudsperson	6
11	Relationship of the Bank with Customers	6
12	Miscellaneous	7
13	Enforcement	7
14	Review	7
Annex 1	Statement of Complaints	8



## Complaints Handling Policy and Procedures

### 1. Introduction

- 1.1 This policy sets out the minimum standards and criteria to be observed by SBI (Mauritius) Ltd or “SBIML” or “the Bank” to deal with complaints made by consumers against the Bank.
- 1.2 The policy has been formulated in line with the “The guidelines on complaints handling policy and procedures applicable to banks and non bank deposit taking institutions licensed by the bank of Mauritius” which was issued by Office of Ombudsperson for Financial Services in line with the Ombudsperson for Financial Services Act 2018 (Act).
- 1.3 The Ombudsperson may for the purposes of the Ombudsperson for Financial Services Act request the Bank to furnish within such time and in such form and manner as he may determine such information as he may require.

### 2. Interpretation

“Act” means the Ombudsperson for Financial Services Act 2018.

“Consumer “ means a customer of the Bank

“Office” means Office of Ombudsperson for Financial Services

“Waiting time” means the time which a customer has to wait before being served by the Bank”

### 3. Complaints Handling Policy and Procedures

- 3.1 In line with the guidelines of the Office of Ombudsperson for Financial Services, the Bank should have in place appropriate and effective internal procedures for handling consumer complaints. In formulating these procedures, regard should be made to the provisions of Section 7 of the Act and the guidelines on Complaint Handling Policy and procedures.
- 3.2 The Bank should have a complaint desk at its head office where complainants may make their complaints. The complaint desk should be manned with an appropriate complaints handling officer versed in the handling of complaints. The complaint desk should be clearly visible to the public.
- 3.3 Complaints received at departments/branches of the Bank should be forwarded to the complaints desk for resolution of same. Upon receipt of the complaint from the department/branch, Complaint Desk should send an acknowledgement to the customer and resolve the same as soon as possible.
- 3.4 Customers are allowed to make complaints by any reasonable means, for example in person at the complaints counter, by phone, by letter, facsimile or e-mail.
- 3.5 Special assistance should be given to customers having disability or language problems.

## Complaints Handling Policy and Procedures

- 3.6 Efforts should be deployed for complaints to be resolved on the spot. In the case that it has not been possible for the complaint to be resolved on the spot, consumers should then be advised to submit their complaints in writing at the counter or by letter through the post, facsimile or by email.
- 3.7 The Bank should, except where the complaint has been made verbally or over the phone, send a written acknowledgement of the complaint within two working days of its receipt, giving the name, job title and contact details of the staff handling the complaint.
- 3.8 The Bank shall appoint a complaints coordinator with the overall responsibility for the handling of complaints. The complaints coordinator should be an Officer at senior managerial level. The complaints coordinator should be empowered to either resolve complaints or have access to, the person who has the authority to do so.
- 3.9 The Complaints Handling Policy & Procedures should be made available to all relevant staff of the Bank on intranet portal. Respective Head of departments should take reasonable steps to ensure that all relevant employees are aware of the Complaint Handling Policy & Procedures and that they act in accordance therewith.
- 3.10 The Complaints Handling Policy & Procedures shall be binding on the Bank.

### **4. Accessibility to Complaints Handling Policy & Procedures**

- 4.1 The Bank should provide a copy of the Complaints Handling Policy & Procedures to its consumers free of charge upon request.

For new consumers, a paragraph on Complaints Handling Policy & Procedures shall be inserted in their terms and conditions informing them of Complaints handling Policy and Procedures and also where to find them.

- 4.2 The Bank shall also publish on its website <https://mu.statebank> the Complaints Handling Policy & Procedures with a view to bringing actual notice thereof to their consumers.

### **5. Time Limit to Deal with Complaints**

- 5.1 A written reply containing the decision of the Bank to the complainant should, as prescribed in the law, be sent to the complainant within 10 days as from the date the complaint is received by the Bank.
- 5.2 Complainants should be informed that in case they are still aggrieved by the decision provided to them by the Bank, or that they do not receive a reply from the Bank concerned within 10 days as from the date of their complaint, they may refer their complaint to the Office of the Ombudsperson to be dealt with in the manner the Office considers appropriate.





## Complaints Handling Policy and Procedures

### **6. Investigation of Complaints by the Bank**

- 6.1 Once a complaint has been received by the Bank, the Bank shall: -
- (a) investigate the complaint competently, promptly and impartially;
  - (b) assess fairly the subject matter of the complaint and see whether the complaint should be upheld and what remedial action or redress (or both) may be appropriate;
  - (c) offer any redress or remedial action which is appropriate;
  - (d) explain to the complainant, in a way that is fair, clear and not misleading, its assessment of the complaint, its decision on it, and any offer of remedial action or redress; and
  - (e) comply promptly with any offer of remedial action or redress which the complainant accepts.
- 6.2 To avoid any conflict of interest, the complaint should be investigated by someone who has not been directly or indirectly involved in the complaint.

### **7. Resources and Staff Training**

- 7.1 The Bank should make available resources needed to ensure the efficiency and effectiveness of a complaint management system. Resources comprise staff, appropriate training and technology.
- 7.2 With a view to continuously enhance the level of customer service, the Bank should provide appropriate training to its staff in order to improve their competence in Customer Care.

### **8. Monitoring and Audit**

- 8.1 The Bank should monitor their complaints to help identify whether its products and services are causing issues for consumers and whether its operations and processes are working as intended. Complaints can serve as helpful indicators of possible weaknesses in processes, training, and controls.
- 8.2 The Bank should have in place an efficient information management system capable to monitor and review the quality of complaint handling, detect underlying problems and take actions to address issues identified.
- 8.3 Effective procedures to monitor complaints should be set up with regular reports to Senior Management for review. Information provided to management should include at least the following: -
- (a) Statistics on the volume and type of complaints received;
  - (b) How well the internal complaint management system meets prescribed performance standards;



## Complaints Handling Policy and Procedures

- (c) The level of customer satisfaction;
- (d) Whether recurrent problems are being identified and corrected.

8.4 A regular assurance exercise should be conducted by competent and independent staff. The assurance exercise should aim at examining whether the procedures are operating effectively.

8.5 The results of the assurance exercise should be used to improve the complaint handling procedures, operating processes, products and services as appropriate.

### **9. Record Keeping**

9.1 The Bank should record and retain details of complaints for at least a period of 7 years as from the date of their receipt.

9.2 The details to be recorded should include:

- a) the complainant's name;
- b) the substance of the complaint;
- c) any correspondence between the Bank and the complainant, including the manner in which the complaint was resolved and details of any redress offered by the Bank ; and
- d) Whether any alleged problem, if substantiated, were rectified and the manner in which this was done.

9.3 The records should be kept in a convenient and accessible form to facilitate discharge by the Ombudsperson or its Officers of its powers under section 5 (3A) of the Act.

### **10. Notification to the Office of Ombudsperson**

10.1 Retail Banking department should provide the Office on a quarterly basis, with information on complaints as per format provided under annex 1.

10.2 To enhance communication with the Office in relation to complaint handling, the Bank should provide the Office within one week as from the issue of this guideline, details of the complaints coordinator appointed by the Bank.

10.3 The Bank should notify the Office as soon as reasonably practicable of any subsequent change of the complaints coordinator.

### **11. Relationship of the Bank with Customers**

11.1 The relationship between the Bank and a consumer shall be guided by three key principles namely: fairness; reliability; and transparency.



## Complaints Handling Policy and Procedures

- 11.2 The Bank should not engage in unfair, deceptive practices or unbecoming behaviour such as intimidating, abusing, or humiliating a consumer. The Bank should, through its préposés, always be courteous towards its customers. Responsibility thereof would be borne by the Bank

### 12. Miscellaneous

- 12.1 The Bank should not close the account of a customer, without good cause shown.
- 12.2 In the case the Bank has good cause to close an account, evidence thereof should be duly documented and it should, except where it is contrary to law or required by a Court of law, give at least one-month notice to the consumer, explaining clearly the reasons for which the account is being closed.
- 12.3 Except as provided for in section 57(6) of the Banking Act, the Bank should not give a different treatment or impose fees on accounts which have remained inactive in the bank, whether held in the name of a minor or any other person until the period of seven years has been reached where it should be treated as abandoned funds.
- 12.4 The Bank should take such measures as are necessary and deploy every effort to reduce the time which consumers have to wait before being served at its premises.

In this context, the Bank should forward to the Office of Ombudsperson for Financial Services a report on a monthly basis showing the total amount of consumers visiting the Bank on a daily basis and the maximum time that a consumer has had to wait at the Bank before being served and the efforts that the Bank has made to reduce waiting time.

- 12.5 Phone calls made by consumers should be attended to promptly by staff. Consumers should not be made to wait for more than 2 minutes after his call has been made. In cases where the recipient of the call is not at his place of work or is busy, the consumer should be so informed and requested to call later. This provision shall not apply to a consumer phoning directly on the telephone number of any particular staff.

### 13. Enforcement

- 13.1 Any employee found to have violated this policy will be subject to disciplinary action, up to and including termination of employment. The Head of Retail Banking shall monitor Compliance with this policy.
- 13.2 All respective Vice-Presidents shall ensure strict adherence of this policy for their respective departments/ Branches.

### 14. Review

- 14.1 This policy shall be reviewed annually or earlier as may be required.





## Complaints Handling Policy and Procedures

Annex 1

### STATEMENT OF COMPLAINTS

PERIOD.....				
Date Received	Name And Address	Nature	Resolved (Details)	Unresolved (Reasons)

