

# Complaints & Grievance Redressal Policy

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**Principal Grievance Officer :** Mukesh Kumar  
MEM & Head HR Marketing & SP

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## **1. BACKGROUND**

The Company is in the business of General Insurance. Insurance is a legal contract between the Insurer and the Insured, wherein the Insurer promises to make good the loss suffered by the Insured for a price known as premium. Insurance protects people from the financial costs that result from loss of life, health, lawsuits, or property damage etc. In providing the insurance services to the Customers there could be occasions wherein the Insured is not happy or satisfied with the service received from the Insurance Company either directly or indirectly through its Agents. Hence there is a need to provide for a policy framework to deal with complaints / grievances of the Customers.

With the objective of protecting the interests of the Policyholders the insurance regulator, IRDA had framed IRDA (Protection of Policyholders' Interests) Regulations, 2002 (the Regulations). The Regulations requires insurance companies to put in place proper procedure and effective mechanism to address complaints and grievances of policyholder efficiently and with speed. Further, IRDA vide its Circular dated 27<sup>th</sup> July 2010 has issued guidelines for Grievance Redressal by Insurance Companies (the Guidelines). The said Guidelines inter-alia prescribes the minimum time frames and uniform definitions and classifications of complaints.

The Company already has a 'Complaints and Grievance Redressal Policy' (Policy). In order to include the provisions of the said Guidelines in the Policy, the same is being revised as provided hereunder.

## **2. EFFECTIVE DATE FOR IMPLEMENTATION OF THE POLICY**

The revised Policy shall be effective from the date as mentioned in the title page of this Policy. The Company shall periodically review the Policy based on the inputs received from the Customers, Authority, Government Bodies and other sources.

## **3. OBJECTIVE OF THE POLICY**

The key objective of the Policy is to provide for a mechanism to speedily redress the grievance and complaints of the Customers to their satisfaction in accordance with the applicable laws.

## **4. SCOPE**

The Policy shall cover the complaints/grievances received from individual customers, channels, agents, corporate agents and other sources relating to issuance, servicing, claims and other issues pertaining to insurance policies. The Policy specifically excludes Inquiry or Requests.

## 6. DEFINITIONS & ABBREVIATION

### DEFINITIONS

1. **Authority** – shall mean the Insurance Regulatory and Development Authority (IRDA) established under sub-section (1) of Section 3 of the IRDA Act, 1999.
2. **Company** - means HDFC ERGO General Insurance Company Limited, incorporated under the provisions of the Companies Act, 1956 and registered with the Authority as an Insurer having registration number 125.
3. **Complainant** - includes any person who expresses dissatisfaction about an action or lack of action, about the standard of service/deficiency of service of the Company or its intermediary (ies)
4. **Complaint/Grievance** – Any communication that expresses dissatisfaction about an action or lack of action, about the standard of service/deficiency of service of the Company or its intermediary (ies) which requires remedial action.
5. **Consumer Association** means any voluntary consumer association registered under the Companies Act, 1956 (1of 1956) or under any other law for the time being in force.
6. **Customer** includes a holder of an insurance policy issued by the Company or a person intending to purchase an insurance policy from the Company (Prospect).
7. **Designated Grievance Officer** shall mean the official appointed by the Company in each branch to redress the grievance of the Complainant.
8. **Government Bodies** includes the Ministry of Consumer Affairs or any other government authority constituted by a competent authority or by an enactment of Parliament or State Legislature.
9. **Inquiry** means any communication from a customer for the primary purpose of seeking information about the Company and/or its products and services.
10. **Insurance Policy** shall mean a policy of insurance issued by or on behalf of the Company in accordance with the provisions of Insurance Act, 1938, Insurance Regulatory and Development Authority Act, 1999 or Regulations issued thereunder, as amended from time to time.
11. **Intermediaries or Insurance Intermediaries** includes agent(s), corporate agent(s) and insurance brokers.
12. **Policy shall mean this** ‘Complaints and Grievance Redressal Policy’ of the Company, as amended from time to time.
13. **Request** means any communication from a Customer soliciting a service such as a change or modification in the Insurance Policy.

**14. Principal Grievance Officer** shall mean the official appointed by the Managing Director and Chief Executive Officer to act as the Principal Grievance Officer under the Policy.

#### ABBREVIATIONS

SPOC – Single Point of Contact

C&G Cell: Complaint & Grievance Cell.

### **3. SOURCE OF COMPLAINTS**

The Company may receive the complaint/grievance from any of the following sources:

- Policyholder
- Beneficiary under the Policy
- Claimant/Nominee under the Policy
- End customer
- Business Channels
- Sales team
- Insurance Regulatory and Development Authority
- Government Bodies
- Consumer Association
- Insurance Councils
- Ombudsman

### **4. LODGING OF COMPLAINTS**

The Complainant can lodge his Complaint/Grievance with any of the following:

- Call Center ( Toll free helpline )  
*1800 2 700 700 (accessible from any Mobile and Landline within India)*  
*1800 226 226 (accessible from any MTNL and BSNL Lines)*
- Emails – [grievance@hdfcergo.com](mailto:grievance@hdfcergo.com)
- Designated Grievance Officer in each branch.
- Company Website – [www.hdfcergo.com](http://www.hdfcergo.com)

## 5. PROCESS

### 5.1 C&G Cell

The C&G cell will be responsible for handling, management and redressal of all Customer complaints received by the Company. Any complaint received by the Company in any mode (including letters, phone calls, e-mails etc.) shall be referred to the C&G Cell within 24 hours from the time of the receipt of the Complaint. The C&G Cell shall follow the procedures for resolving the complaint as provided in Annexure I.

### 5.2 Intimation of complaint

On receipt of a complaint the C&G cell shall take the following steps:

- A written acknowledgement shall be sent to the Complainant within three (3) working days from the date of receipt of any Complaint/Grievance.
- Where the Company resolves the grievance /complaint within 3 days, the C&L Cell shall communicate the resolution along with the acknowledgement.
- The acknowledgement shall mention the unique reference number recorded in the system, name and designation of the grievance officer handling the case, grievance redressal procedure and the time limit for resolution of the same.
- All complaints received by the C&G cell shall be forwarded to the SPOC / Manager of respective functions immediately.
- In case of additional requirements raised, the C&G cell shall interact with the Complainant for the document requirements and upon receipt shall forward the documents to SPOC.

### 5.3 Complaint resolution

The Company shall endeavour to resolve the Complaint/Grievance within two (2) weeks from the date of receipt of the Complaint/Grievance. The C&G cell shall communicate the Company's decision and the same would inter-alia contain the following:

- The details of the resolution offered or reasons of rejection.
- Process to pursue further, if the customer is dissatisfied with the resolution.

The Company's **C&G cell** shall treat the Complaint/Grievance as closed if there is no response from the Complainant to the communication sent by the Company, within eight (8) weeks from the date of receipt of the said communication.

### 5.4 Customer Escalation

In case the Customer is not satisfied with the response / resolution given / offered by the C&G cell, then the Customer can write to the Principal Grievance Officer of the Company at the following address

To the Principal Grievance Officer  
HDFC ERGO General Insurance Company Limited  
6<sup>th</sup> floor, Leela Business Park.  
Andheri Kurla Road,  
Andheri (E), Mumbai – 400059  
e-mail: [principalgrievanceofficer@hdfcergo.com](mailto:principalgrievanceofficer@hdfcergo.com)

## 5.5 Office of the Insurance Ombudsman

With the objective of amicable settlement of all complaints relating to settlement of claims arising out of insurance contract, the Central Government had notified the Redressal of Public Grievances Rules, 1998 ('the Rules'). The Rules inter-alia provide for establishment of Insurance Council comprising of representatives of all insurance companies. In terms of Rule 6 of the Rules, the Governing Body of the Insurance Council shall appoint one or more persons as the Ombudsman for achieving the objectives of the Rules.

As per the provisions of Rule 13 of the Rules, any person who has a grievance against an insurer, may himself or through his legal heirs make a compliant in writing to the Ombudsman within whose jurisdiction the branch or office of the insurer complained against is located. Such complaints shall be in writing, duly signed by the complainant or through his legal heirs and shall state clearly the name and address of the complainant, the name of the branch or office of the insurer against which the complaint is made, the fact giving rise to complaint supported by documents, if any, relied on by the complainant, the nature and extent of the loss caused to the complainant and the relief sought from the Ombudsman.

Accordingly, in case even after escalating the Grievance / Complaint as provided under Para 5.4 above, if the Customer is not satisfied with the resolution, then he may approach the office of the Insurance Ombudsman for redressal of his Complaint / Grievance.

It is pertinent to note that:

- i. The Ombudsman will not entertain any compliant unless the complainant had, before making a complaint to the Ombudsman, made a written representation to the insurer and either the insurer had rejected the complaint or the complainant had not received any reply within a period of one month after the insurer received his representation or the complainant is not satisfied with the reply given to him by the insurer.
- ii. The complaint to the Ombudsman shall be made within a period of one year after the Company had rejected the representation of the complainant or sent its final reply on the representation of the complainant.
- iii. The complaint is not on the same subject matter, for which any proceedings before any court, or Consumer Forum, or arbitrator is pending or were so earlier.

The name and address of the Insurance Ombudsman is given in Annexure II.

## **6. Closure of Grievance:**

The Company shall consider the Complaint as disposed of and closed when:

- (a). the Company has acceded to the request of the Complainant fully.
- (b). where the Complainant has indicated in writing , acceptance of the response of the Company.
- (c). where the Complainant has not responded to the Company within 8 weeks of the Company's written response.
- (d) where the Grievance Redressal Officer has certified that the Company has discharged its contractual, statutory and regulatory obligations and therefore closes the complaint.

## **7. Categorisation of Complaints / Grievances:**

The Company shall categorise the complaints / grievances as prescribed by the Authority from time to time.

## **8. Publicizing Grievance redressal Procedure:**

The Company shall adequately publicize its grievance redressal policy at the branches and shall upload the same on its website i.e. [www.hdfcergo.com](http://www.hdfcergo.com)

## **9. Policyholder Protection Committee:**

The Company has a policyholder protection committee viz. "Policyholder Protection and Grievance Redressal Committee" or PPGRC. The PPGRC comprises of heads of (i) Head – HR, Strategy and Marketing, (ii) Claims and (iii) Operations and Services Group. The PPGRC directly reports to the Board of Directors and places report of its activities before the Board on a quarterly basis.

The PPGRC inter-alia reviews the nature of complaints and grievances received from the Customers and takes necessary corrective actions / steps towards identifying & eliminating the core reasons for the complaints / grievances.

### **The main objectives of the PPGRC are:**

- (a) to protect and safeguard the interests of the policyholders and .
- (b) to educate customers about insurance products and complaint handing procedure.

### **The responsibilities of the PPGRC includes:**

- ensuring compliance with the statutory requirements as laid down in the regulatory framework.
- putting in place proper procedures and effective mechanism to address complaints and grievances of policyholders.

- review of the mechanism at periodic intervals.
- ensuring adequacy of disclosure of “material information” to the policyholders.
- review the status of complaints at periodic intervals.
- providing details of grievances at periodic intervals in such formats as may be prescribed by the IRDA
- providing details of insurance ombudsmen to the policyholders

## Annexure I

### Internal Process followed by C&G Cell for Grievance Redressal

#### 1. PROCESS

##### 1.1 C&G Cell

The C&G cell will be responsible for handling and management of all customer complaints received by the Company.

##### 1.2 Intimation of complaint

On receipt of a complaint through any of the sources defined in the Grievance Redressal Policy, the following steps shall be carried out:

- Enter the details of the complaint in TALISMA system
- Tag the details in TALISMA as a complaint
- Update the relevant tagging within complaint as per Non life classification list attached

##### 1.3 Handling of complaint

- On tagging of emails as a complaint, the same will be handled end-to-end by the C&G cell
- The complaint is forwarded to the respective functions as per the grid given below:

Function	SPOC (Single Point of Contact)
<b>Claims</b>	Regional Claims Manager
<b>Sales</b>	Respective Sales manager
<b>Operations</b>	Functional manager

- C&G cell will keep a track of all complaints on a 'built-in' filter which shall carry the following details:
  - Interaction ID
  - Policy no
  - Created date & time
  - Type of complaint
  - Assigned to
- All complaints received by the C&G cell will be forwarded to the Manager of respective functions immediately.
- Simultaneously, a standard communication will be sent to the customer acknowledging receipt of the complaint in accordance with the Grievance Redressal Policy.
- On confirmation of resolution from the respective function, the same is communicated in writing by the C&G cell to the customer on the same day.
- In case of additional requirements raised, the C&G cell interacts with the customer for the document requirements and forwards the documents to SPOC.
- A separate tracking mechanism is setup to enable adequate follow-up of cases.

#### 1.4 Complaint resolution by functions

On receipt of complaint from the C&G cell, the respective functions shall perform the following set of activities:

- Ensure resolution of the complaint through the concerned personnel
- Revert back to C&G cell in case of additional requirements
- Communicate the final resolution to the C&G cell within defined timelines

#### 1.5 Escalations

The C&G cell will be responsible to keep track of resolutions for all type of complaints. A standard escalation procedure will be followed by the C&G cell in case of non-receipt of resolutions.

	<b>Turn-Around-Time (TAT) (working days)</b>	<b>Action Owner</b>
<i>Resolution</i>	T + 1	Functional Manager
<i>Escalation1</i>	T + 3	National Manager
<i>Escalation2</i>	T + 5	Business Head
<i>Escalation3</i>	T + 7	Principal Grievance Officer

\* T is the date of receipt of the complaint.

### 2.1 REPORTING

The C&G cell shall provides the MIS showing overall performance as per the prescribed timelines to the Principal Grievance Officer.

Annexure II

**INSURANCE OMBUDSMAN CENTRES**



CONTACT DETAILS	JURISDICTION
<p><b>AHMEDABAD</b> Office of the Insurance Ombudsman, 2nd floor, Ambica House, Near C.U. Shah College, 5, Navyug Colony, Ashram Road, Ahmedabad – 380 014 Tel.:- 079-27546150/139, Fax:- 079-27546142 Email:-<a href="mailto:ins.omb@rediffmail.com">ins.omb@rediffmail.com</a></p>	<p>State of Gujarat and Union Territories of Dadra &amp; Nagar Haveli and Daman and Diu.</p>
<p><b>BHOPAL</b> Office of the Insurance Ombudsman, 1st Floor, 117, Zone-II, (Above D.M. Motors Pvt. Ltd.) Maharana Pratap Nagar, BHOPAL - 462 011, Tel.:- 0755-2769200/202/201 Fax:0755-2769203 E-mail: <a href="mailto:bimalokpalbhopal@airtelbroadband.in">bimalokpalbhopal@airtelbroadband.in</a></p>	<p>States of Madhya Pradesh and Chhattisgarh.</p>
<p><b>BHUBANESHWAR</b> Office of the Insurance Ombudsman, 62, Forest park, Bhubneshwar – 751 009. Tel.:- 0674-2596461/2596455, Fax:- 0674-2596429 Email:-<a href="mailto:ioobbsr@dataone.in">ioobbsr@dataone.in</a></p>	<p>State of Orissa.</p>
<p><b>CHANDIGARH</b> Office of the Insurance Ombudsman, S.C.O. No. 101, 102 &amp; 103, 2nd Floor, Batra Building, Sector 17 – D, Chandigarh – 160 017. Tel.:- 0172-2706196/5861/6468, Fax:- 0172-2708274 Email:-<a href="mailto:ombchd@yahoo.co.in">ombchd@yahoo.co.in</a></p>	<p>States of Punjab, Haryana, Himachal Pradesh, Jammu &amp; Kashmir and Union territory of Chandigarh.</p>
<p><b>CHENNAI</b> Office of the Insurance Ombudsman, Fatima Akhtar Court, 4th Floor, 453 (old 312), Anna Salai, Teynampet, CHENNAI – 600 018. Tel.:- 044-24333678/664/668, Fax:- 044-24333664 Email:-<a href="mailto:chennaiinsuranceombudsman@gmail.com">chennaiinsuranceombudsman@gmail.com</a></p>	<p>State of Tamil Nadu and Union Territories - Pondicherry Town and Karaikal (which are part of Union Territory of Pondicherry).</p>
<p><b>DELHI</b> Office of the Insurance Ombudsman, 2/2 A, Universal Insurance Building, Asaf Ali Road, New Delhi – 110 002. Tel.:- 011-23239611/7539/7532, Fax:- 011- 23230858 Email:-<a href="mailto:jobdelrai@rediffmail.com">jobdelrai@rediffmail.com</a></p>	<p>States of Delhi and Rajasthan.</p>

CONTACT DETAILS	JURISDICTION
<p><b>GUWAHATI</b> Office of the Insurance Ombudsman, Aquarius, Bhaskar Nagar, R.G. Baruah Rd. , Guwahati - 781 021(Assam), Tel.:- 0361-2132204/2131307/2132205, Fax:- 0361-2732937 Email:- omb_ghy@sify.com</p>	<p>States of Assam, Meghalaya, Manipur, Mizoram, Arunachal Pradesh, Nagaland and Tripura.</p>
<p><b>HYDERABAD</b> Office of the Insurance Ombudsman, 6-2-46, 1st floor, "Moin Court" Lane Opp. Saleem Function Palace, A. C. Guards, Lakdi-Ka-Pool, Hyderabad - 500 004. Tel.:- 040-23325325/23312122, Fax:- 040-23376599 Email:-<a href="mailto:insombudhyd@gmail.com">insombudhyd@gmail.com</a></p>	<p>States of Andhra Pradesh, Karnataka and Union Territory of Yanam - a part of the Union Territory of Pondicherry.</p>
<p><b>KOCHI</b> Office of the Insurance Ombudsman, 2nd Floor, CC 27 / 2603, Pulinat Bldg., Opp. Cochin Shipyard, M. G. Road, Ernakulam - 682 015. Tel.:- 0484-2358734/759/9338, Fax:- 0484-2359336 Email:- <a href="mailto:iokochi@asianetindia.com">iokochi@asianetindia.com</a></p>	<p>State of Kerala and Union Territory of (a) Lakshadweep (b) Mahe-a part of Union Territory of Pondicherry.</p>
<p><b>KOLKATA</b> Office of the Insurance Ombudsman, North British Bldg., 3rd Floor, 29, N. S. Road, Kolkata - 700 001. Tel.:- 033-22134869/67/66, Fax:- 033-22134868 Email:-<a href="mailto:iombsbpa@bsnl.in">iombsbpa@bsnl.in</a></p>	<p>States of West Bengal, Bihar, Sikkim, Jharkhand and Union Territories of Andaman and Nicobar Islands.</p>
<p><b>LUCKNOW</b> Office of the Insurance Ombudsman, 6th Floor, Jeevan Bhawan, Phase-II, Nawal Kishore Road, Hazratganj, Lucknow-226 001. Tel.:- 0522-2201188/31330/1, Fax:- 0522-2231310 Email:-<a href="mailto:insombudsman@rediffmail.com">insombudsman@rediffmail.com</a></p>	<p>States of Uttar Pradesh and Uttaranchal.</p>
<p><b>MUMBAI</b> Office of the Insurance Ombudsman, 3rd Floor, Jeevan Seva Annexe, S. V. Road, Santacruz (W), Mumbai - 400 054. Tel.:- 022-26106928/360/6552/6960, Fax:- 022-26106052 Email:- <a href="mailto:ombudsmanmumbai@gmail.com">ombudsmanmumbai@gmail.com</a></p>	<p>States of Maharashtra and Goa.</p>