
COMPLAINT HANDLING POLICY (CHP)

(Version 3)

JUNE 20, 2024

NATIONAL SAVINGS BANK
“Savings House” No. 255, Galle Road, Colombo-3

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1. Introduction

Customer Satisfaction is a core belief at the National Savings Bank (NSB). An extension of this premise, is the basic act of listening to the customer. In the process of doing so, the bank receives valuable information including constructive criticism focused on enhancing products and services offered, as well as seeds of new concepts. Concurrently, it is inevitable that grievances from the customer in the form of complaints are also received. As such, it is necessary to resolve such complaints to the satisfaction of the customer. The comprehensive process by which the resolution is achieved is the focus of this Complaint Handling Policy (CHP), described in detail henceforth.

2. Policy Statement

To resolve customer complaints in a prompt, transparent and effective manner to ensure natural justice prevails to all parties concerned whilst ensuring the following key policy mandates are fulfilled.

a. Adopt a Complaint Handling Policy

NSB Shall adopt the proceeding written policy encompassing appropriate mechanisms and procedures to receive, resolve with fair redress, compensate and respond to individual grievances and complaints of NSB customers as well as retain such records. NSB shall also publish the said policy in the NSB Corporate Website at <https://www.nsb.lk/downloads/>

b. Establish an independent Customer Complaint Unit (CCU)

A Customer Complaint Unit (CCU) has been established at the Marketing Division independent from business units and is supervised by the Head of Marketing, being a Key Management Personnel (KMP).

c. Conduct root cause analysis on Complaints and Grievances received.

NSB shall conduct routine root cause analysis on complaint data and utilise such analysis to improve the products and services offered, as part of the Operational Risk Management function of the Risk Management unit.

3. Regulatory Framework

As a Licensed Specialized Bank (LSB), the NSB comes under the regulatory purview of the Central Bank of Sri Lanka (CBSL), whose Directions, Determinations and Circulars ensure effective Bank Supervision of the entire Banking and Financial Services Industry (BFSI). Accordingly, the policy described herein is anchored upon the following guidelines issued by the CBSL.

a. Banking Act Direction No. 08 of 2011, titled “Customer Charter of Licensed Banks”.

This direction by the CBSL led to the adoption of a Customer Charter and subsequently a code of conduct based upon the customer charter to ensure that the interests of customers are safeguarded, a healthy relationship is maintained between customers and banks and improve customer confidence in the banking sector to ensure stability and financial soundness prevails therein.

i. Sub Section 6, titled “Complaint Measures and Relief” (Parts a, b, c, d, e, f & g)

This subsection enshrines the customers right to seek redress for their grievances that may occur due to the treatment meted out to customers by banks.

- b. Gazette Extraordinary of the Democratic Socialist Republic of Sri Lanka No. 2344/17, titled “Financial Consumer Protection Regulations”.

This gazette regulation is issued to supplement the consumer protection framework provided by the Banking Act Direction No. 08 of 2011 on Customer Charter of Licensed Banks with the view to ensure financial system stability.

Accordingly, it is essential that the financial institutions operate in compliance with all legal and regulatory requirements thereby enabling the financial consumers of such institutions to obtain a competitive service in a just and equitable manner.

- i. Subsection, titled “Complaint Handling and Redress Mechanism” (Parts 42,43, 44, 45, 46 & 47)

This subsection focuses on the necessity of the customers of the financial institutions to be able to submit their complaints and grievances to a responsible institution for relief.

4. Form of Complaints

Complaints are raised in a variety of forms categorised based on their mode of communication.

- a. Verbal presentation or written presentation
- b. Complainant communication or Third-Party communication
- c. Direct Complaint to the NSB or Indirect complaint through other authorities
- d. Confidential complaint or public complaint via channels such as media platforms

It is the objective of NSB to address all the above forms of complaints, utilising the complaint handling procedure described in section 5.

5. Complaint Handling Mechanism

The Complaint Handling Mechanism of NSB is described as follows.

a. Available Channels for Submitting Complaints

- i. Customer Complaint Unit (On Working Days 8:30am to 3:00pm)
Authority: Officer in Charge
Address: Customer Complaint Unit (CCU)
7th Floor, “Savings House”
National Savings Bank,
No.255, Galle Road,
Colombo-3.
Telephone: 0112 576 730
Email: ccu@nsb.lk
Refer <https://www.nsb.lk/contact-and-inquiries/> or any NSB Service Point.
- ii. NSB Branches or Postal Branches (On Working Days 8:30am to 3:00pm)
Authority: The Manager
Contact: Refer <https://www.nsb.lk/about-us/our-network/>
- iii. NSB Contact Centre on 1972 or 0112 379 379 (24x7)

b. Timeline for Complaint Resolution

- i. Acknowledgement – within 5 working days of communication.
- ii. Processing & Resolution – within 21 calendar days from date of acknowledgement.
- iii. Extended Processing & Resolution – within 3 months from date of acknowledgement. (Notification of extension shall be given within 21 calendar days from date of acknowledgement)

c. Responsibility of the Complainant

The complainant should take steps to seek relief by way of communicating the grievance which occurred, clearly and comprehensively with all necessary facts without ambiguity via the channels described in section 5 of this document.

Further, the complainant should refrain from causing any undue / illegal influence upon the NSB and its officers in charge of processing the complaint of the Financial Consumer (Complainant).

d. Obligations of the NSB

The NSB shall strive to resolve all complaints adhering to the regulations described above as well as the regulations by which the NSB is governed and in compliance with best banking practices, whilst adhering to the general principles of natural justice. Further, special attention / care will be given to customers such as the elderly, the differently abled or those customers with low financial literacy in the process of receiving and handling of complaints.

e. Process of Escalation (If not Satisfied with Resolution of NSB CCU)

In the case of a complainant being unsatisfied with the resolution granted by the CCU, the complainant may escalate the complaint to the undermentioned authorities.

- i. The General Manager / CEO.
6th Floor, “Savings House”
National Savings Bank,
No.255, Galle Road,
Colombo-3.
Telephone: 0112 573 179
Email: gm@nsb.lk
- ii. The Chairperson.
6th Floor, “Savings House”
National Savings Bank,
No.255, Galle Road,
Colombo-3.
Telephone: 0112 573 334
Email: chairman@nsb.lk

f. Alternative Dispute Resolution Mechanism

The complainant can also seek redress from the undermentioned alternative dispute resolution channels, where the complainant is not satisfied with the manner in which the complaint was attended to or is not satisfied with the resolution granted by NSB

i. The Financial Ombudsman.

The Office of the Financial Ombudsman of Sri Lanka
No.143 A, Vajira Road,
Colombo-5.
Telephone: 0112 595 62
Fax: 0112 295 625
Email: fosril@sltnet.lk
Web: www.financialombudsman.lk

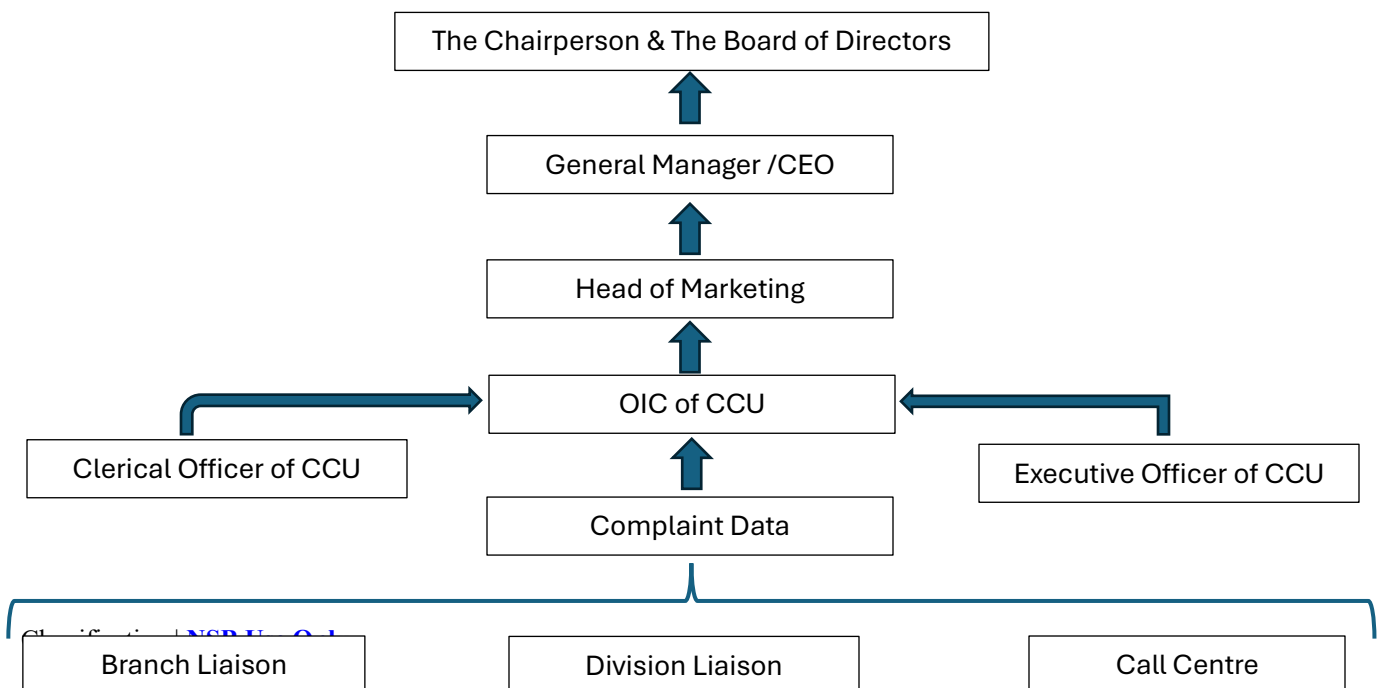
ii. The Director.

Financial Consumer Relations Department (FCRD)
Central Bank of Sri Lanka
No.30, Janadhipathi Mawatha,
Colombo-1.
Fax: 0112 477 744
Email: fcrd@cbsl.lk

In the case of seeking redress from the CBSL, if the complainant has already lodged a complaint with NSB CCU, the complainant is required to allow at least 30 days for NSB to process the complaint.

Further, the complainant can seek redress from CBSL within a period not later than One (01) year from the date of submission of the complaint with NSB.

g. Hierarchy of the CCU



6. Conflict of Interests

The NSB shall avoid conflicts of interests arising from handling complaints of its customers. Further, an officer or officers who are party to or a direct supervisor of a party to the complaint shall not be involved in any stage of the complaint handling procedure described in section 5.

7. Procedure for Complaints Received at NSB CCU.

In the case of complaints received at NSB CCU the following procedure should be implemented.

a. Document the Complaint

The OIC CCU should maintain a register to document the complaints and allocate a unique reference number. The undermentioned particulars should be included in this register.

- i. Complaint Reference Number (CRN).
- ii. Date the complaint was made.
- iii. Name of the person who made the complaint (Complainant).
- iv. Account Number (If Any).
- v. Description of the Complaint.
- vi. Action Taken.
- vii. Present Status (Resolved / Escalated)
- viii. Date of resolution, if resolved
- ix. Authorised Officer's Signature.

b. Processing the Complaint

Complaints received at the NSB CCU should be processed as described hereunder.

- i. Identify the nature of Complaint.

The OIC of CCU shall identify the Nature of the Complaint to determine whether it is a Suggestion or a Grievance.

Suggestions are to be forwarded to the GM / CEO through the Head of Marketing.

Grievances are to be processed through the complaint handling mechanism.

- ii. Register and Provide Acknowledgement

The OIC of CCU shall register Grievances and shall provide the complainant an acknowledgement in writing as per the format described in Annexure I, within Five (05) working days of receiving the initial customer complaint. The Complaint Reference No. shall follow the format (CCU/Year/Month/Serial No.)

- iii. Ascertain all pertinent facts.

The OIC of CCU shall ascertain all relevant data in connection with the complaint.

- iv. Resolve the Complaint within Standard Timeframe (21 days).

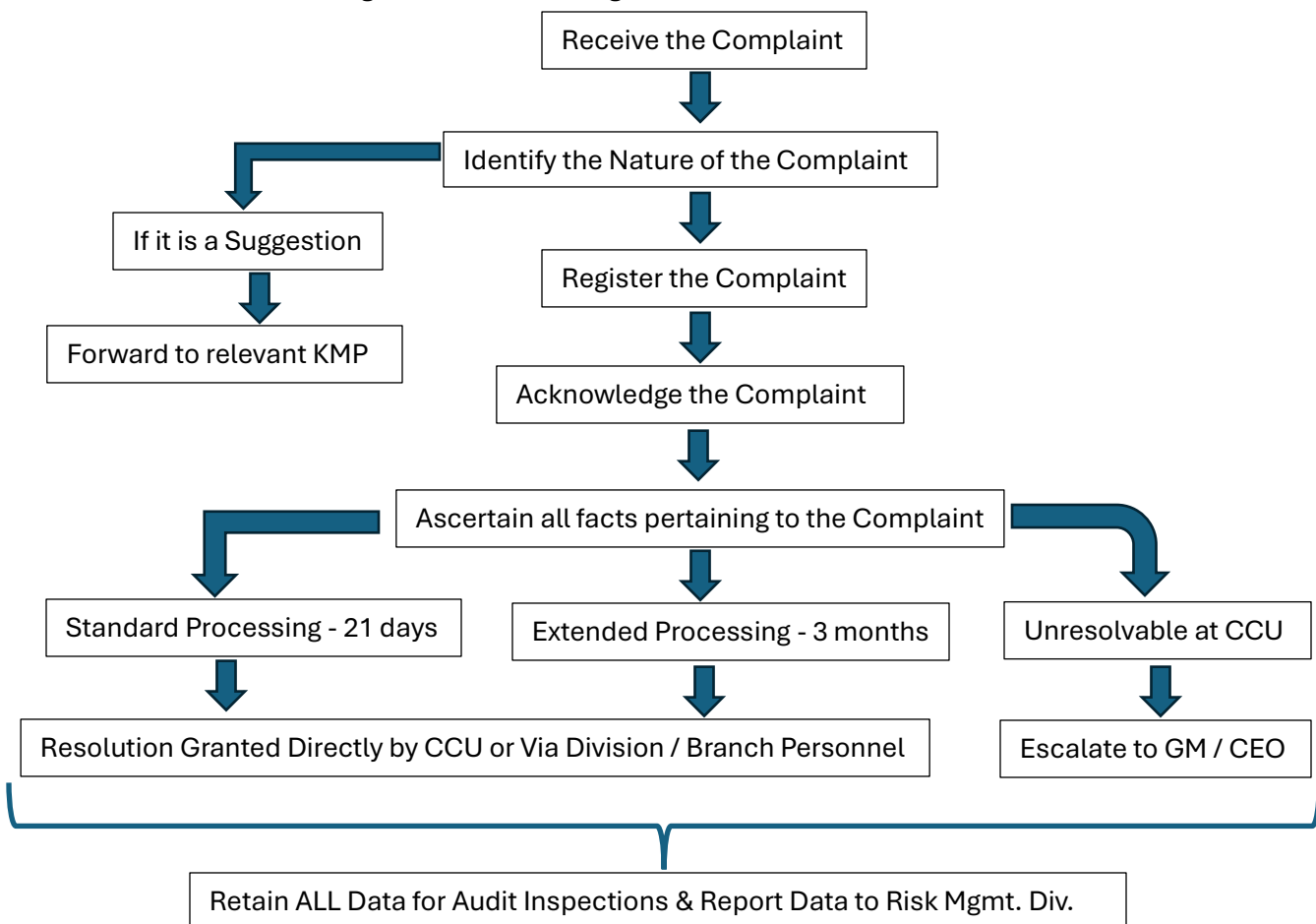
The OIC of CCU shall attempt to resolve the complaint where possible within 21 calendar days of issuing the acknowledgement and the response should be provided in writing to the complainant upon such resolution by CCU or any other NSB Personnel.

- v. Resolve the Complaint withing Extended Timeframe (21 days).

The OIC of CCU shall attempt to resolve the complaint where extended time is required by writing to the complainant within 21 calendar days from the date of issuing the acknowledgement and requesting a maximum of 3 months from the date of issuing the acknowledgement. The response should be provided in writing to the complainant upon such resolution by CCU or any other NSB Personnel.

- vi. Escalate to GM / CEO where the Complaint is unresolvable at the CCU

Any complaint which cannot be resolved by the OIC of the CCU, should be directed through Head of Marketing and the Senior DGM to the GM / CEO.



The process to handle Complaints received at CCU (Figure 1)

8. Procedure for Complaints Received at Stations other than the CCU.

In the case of complaints received at NSB Branches, Regional Offices & all other service points the following procedure should be implemented.

a. Document the Complaint

The Branches, Regional Offices and other service points should maintain a register to document the complaints and allocate a unique reference number. The undermentioned particulars should be included in this register.

- i. Complaint Reference Number (CRN).
- ii. Date the complaint was made.
- iii. Name of the person who made the complaint (Complainant).
- iv. Account Number (If Any).
- v. Description of the Complaint.
- vi. Action Taken.
- vii. Present Status (Resolved / Forwarded to CCU).
- viii. Date of resolution, if resolved.
- ix. Authorised Officer's Signature.

b. Processing the Complaint

Complaints received at the NSB Branches, NSB Regional Offices and other service points should be processed as described.

- i. Identify the nature of Complaint.

The Nature of the Complaint should be identified to determine whether it is a Suggestion or a Grievance.

Suggestions are to be forwarded to the GM / CEO through the relevant hierarchy. Grievances are to be processed through the complaint handling mechanism.

- ii. Register and Provide Acknowledgement

Grievances should be registered and the complainant shall be provided an acknowledgement in writing as per the format described in Annexure I. The Complaint Reference No. shall follow the format (*Br.Code/Comp./Year/Month/Serial No.*)

- iii. Ascertain all pertinent facts.

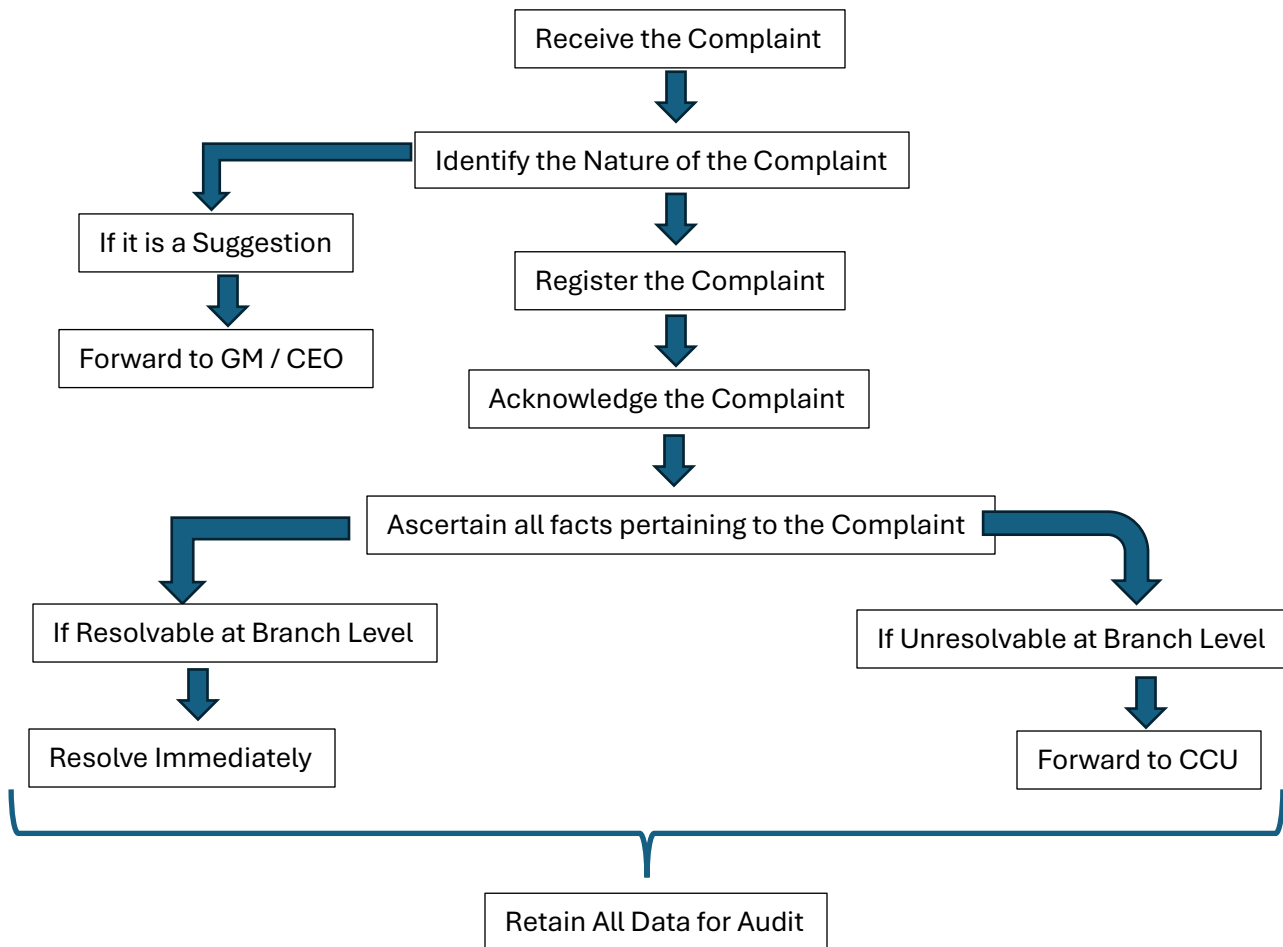
All relevant data in connection with the complaint should be ascertained.

iv. Resolve the Complaint where possible.

Any complaint which can be resolved by the Manager / Regional Manager / Head of Unit, should be resolved and an appropriate response should be provided to the complainant upon such resolution. The CCU should be notified of the same.

v. Forward to CCU where the Complaint is unresolvable.

Any complaint which cannot be resolved by the Manager / Regional Manager / Head of Unit should be forwarded to the Customer Complaint Unit (CCU) utilising the format given in Annexure II.



The process to handle Complaints received at Branches, Regional Offices & other service Points (Figure 2)

9. Appointment of Liaison Officers from all Branches, Regional Offices & other Divisions.

For the purpose of handling CCU tasks expediently, the undermentioned officers from respective Branches / Postal Branches, Regional Offices and Other divisions shall function as Liaison Officers (LO) of CCU. Accordingly, the stations are as follows.

- i. Branches / Postal Branches – Branch Manager
- ii. Regional Offices – Regional Manager
- iii. Other Divisions – Office Manager

10. Complaint Monitoring, Supervision, Escalation & Reviewing

The task of Complaint Monitoring, Customer Complaint Unit Supervision, Customer Complaint Escalation and Operational Review of the Customer Complain Unit shall be carried out as follows.

a. Complaint Handling Officer

An Officer in Charge (OIC) of the Customer Complaint Unit (CCU) shall be appointed by NSB, who shall be tasked with all CCU operations.

b. Key Management Personnel

A key Management Personnel shall be appointed to supervise the Customer Complaint Unit and be responsible for the resolution of all complaints at the CCU level.

c. Complaint Escalation

Any complaint that cannot be resolved at the Head of Marketing level shall be escalated to the attention of the General Manager / CEO through the Senior DGM.

Any complaint that cannot be resolved at the level of GM / CEO shall be escalated to the attention of the Board of Directors through the Chairperson.

d. Operational Review

The concerns raised in the complaints must be reviewed at the Customer Complain Unit (CCU) level. A regular assurance exercise aimed at examining whether the complaint handling procedures described herein fulfil the stated aims of the policy and the procedures are operating effectively.

11. Management Information

- i. All complaints received by Branch Managers/ Regional Manager Head Office Divisions (resolved and forwarded to CCU) should be recorded in a Register maintained in the respective Branch/Region/Division.
- ii. The OIC of CCU should submit to the Head of Marketing and to the Head of Risk Management Division a summary report including resolved and unresolved complaints on a monthly basis.
- iii. The Risk Management Division should report the management information to Integrated Risk Management Committee (IRMC) and the Board of Directors on a quarterly basis.
- iv. The Operational Risk Unit of the Risk Management Division should examine the root cause on operational vulnerabilities to take corrective action and to report the Key Risk Indicators (KRI) to Executive Risk Management Committee (ERMC) and Integrated Risk Management Committee (IRMC) on regular basis.
- v. Customer complaints register / data base of CCU & the Branch / Division level complaint registers should be reviewed by the Internal Audit Division to ensure all customer complaints are resolved and / or outstanding complaints are being dealt with.
- vi. CCU should record and retain the details of complaints for a period of three (03) years from the date of completing the process. The record should be kept in a convenient and accessible form to facilitate examination by the Audit Division during regular on-site or ad hoc examination.
- vii. CCU should retain all complaint data for a period of One Year in Physical format and transfer the relevant data to a digital format thereafter to be retained for a period of Five (05) years.

12. Policy Review

The responsibility of the implementation, review and the management of the Complaint Handling Policy is vested upon the OIC of the CCU supervised by the Key Management Personnel and the policy review is to be carried out at least once in three (3) years or as per the directions given by the CBSL or as and when amendments are required.

13. Violation of the Complaint Handling Policy

Any violation of the CHP is subject to the disciplinary code of the NSB.

Format for The Acknowledgement to be issued upon receiving a Customer Complaint.



Complaint Acknowledgement

-----,
-----,
-----.

(Customer Address)

Ven. / Rev. / Sir / Madam,

We acknowledge receipt of your complaint and shall respond to you in due course.

Please use reference no. in all future correspondence in this regard.

Kindly treat this as an interim response.

Best Regards,

Officer-in-Charge

Customer Complaints Unit

Format for reporting complaints to the CCU which are received at stations other than the CCU and unresolvable.



Complaint Details

Name: -----

Date of Complaint: -----

Complaint Reference No. (Br. Code/Comp./Year/Month/ Serial Number)

Account No: -----

Contact Details: 1. Postal Address-----
 2. Email-----
 3. Telephone No.-----

Complaint :- -----

-----Annexed herewith is a copy of the customer complaint received through Post / Email for reference

Reporting Branch/ Division -----

Signature -----