



**ManipalCigna Health Insurance Company Limited**

**Customer Grievance Redressal Policy**

**Owner: Customer Service Head**

**Approver: Board of Directors**

**Date of Review**

| <b>Date of Review</b>       | <b>Changes to Section</b>   | <b>Review initiated by</b> | <b>Review signed off by</b>                   | <b>Review Approved by</b> | <b>Effective from</b>     |
|-----------------------------|---|----------------------------|---|---------------------------|---------------------------|
| 29th May 2018               | Annual Review   | Customer Service           | Compliance and Legal Head<br>Service Delivery | Board                     | 10th August 2018          |
| 10th Apr 2019               | Annual Review   | Shruti Vyas                | Tahira Patel                                  | Board                     | 2nd May 2019              |
| 27th May 2019               | Annual Review   | Shruti Vyas                | Tahira Patel                                  | Board                     | 2nd August 2019           |
| 17th Jan 2020               | Annual Review   | Shruti Vyas                | Priya Gilbile                                 | Board                     | 6th February 2020         |
| 24th July 2020              | Annual Review   | Shruti Vyas                | Priya Gilbile                                 | Board                     | 5th August 2020           |
| 18th April 2023             | Annual Review   | Rakhee Desousa             | Priya Gilbile                                 | Board                     | 18th April 2023           |
| 13 <sup>th</sup> July 2023  | Grievance escalation Matrix   | Rakhee Desousa             | Priya Gilbile                                 | Board                     | 3 <sup>rd</sup> Aug 2023  |
| 17 <sup>th</sup> April 2024 | Annual Review<br>Grievance escalation Matrix (addition of CGRO)<br>PPHI name changed to PPGR&CM | Rakhee Desousa             | Ashish Yadav                                  | Board                     | 8 <sup>th</sup> May 2024  |
| 15 <sup>th</sup> July 2024  | Grievance Mailing address   | Rakhee Desousa             | Ashish Yadav                                  | Board                     | 2 August 2024             |
| 16 <sup>th</sup> Oct 2024   | Grievance TAT updated as per Master circular<br>IRDAI/PP&GR/CIR/MISC/117/9/2024                 | Rakhee Desousa             | Ashish Yadav                                  | Board                     | 28 <sup>th</sup> Oct 2024 |

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**Confidentiality Clause:**

All information held about the procedure or in connection with the procedure and any of the above is to be regarded as confidential. One will not at any time during tenure of employment or afterwards, disclose to any person any information as to the business, dealings, practice, accounts, finances, trading, software, know-how, affairs of the procedure or otherwise connected with the procedure. Any breach of this clause would constitute very serious disciplinary action.

Introduction

**1.1. Scope**

(a) This Customer Grievance policy is prepared with the aim to articulate IRDA requirements which are to be

carried out by ManipalCigna Health Insurance Company Limited.

- (b) This Policy covers the grievances received from all the customers relating to issuance, servicing, claims and other issues pertaining to insurance policies. *(Customers, hereafter, refer to external customers of the company in this policy)*
- (c) This policy covers the guidelines issued by the IRDA for handling customer grievances.

## **1.2. Objectives**

The objectives of this Policy are summarized below:

- (a) To ensure that all aggrieved customers are treated fairly.
- (b) To ensure that all grievances raised by the customers are dealt with courteously, accurately and resolved in a timely manner to their satisfaction.
- (c) To ensure that customers are made aware of their rights to enable them to opt for alternate remedies as per the terms and condition of the policy, in the event that they are not satisfied with the resolution.
- (d) Document internal and regulatory reporting requirements to be complied within the applicable timelines.

## **1.3. Target Audience**

This Policy is strictly for internal use and shall be made available to all personnel across the Company.

## **1.4. Key Terms Used**

- (a) IRDA – Insurance Regulatory and Development Authority
- (b) CEO/MD – Chief Executive Officer/ Managing Director
- (c) SR – Service Request
- (d) IGMS – Integrated Grievance Management System (Bima Bharosa)
- (e) CRM – Customer Relationship Management

## 2. Synopsis of Regulatory Guidelines

### Key Definitions

#### Query

Customers contacting any touch points for enquiring about any product / process / service. Customer contacting to enquire about earlier Request or where parent call is open and within TAT.

#### Requests

A Request can be defined as any communication from a customer soliciting a service such as change or modification in the policy.

#### Escalated Request

Where policy holder expressing dis-satisfaction, but company has delivered the due service, the transaction would be re-executed.

#### Grievance

Grievance" means an oral or written expression of dissatisfaction about an action or lack of action about the standard of service or deficiency of service of an insurer, insurance agent or insurance intermediary made by, or on behalf of, a consumer.

#### Redressal

Redressal' means the resolution or disposal of the grievance and communication to the complainant. In the event of non-redressal/delay in redressal the company shall communicate the reason to the complainant.

#### Origination of Grievance

Any lapse in service, resulting to policyholder dis-satisfaction is classified as 'grievance' Lapse in service would be defined as instances where the company has not been able to meet the defined 'Service Delivery Standards' i.e. process failures / breach of regulatory TAT.

### 3. Grievance Redressal Frame

#### 3.1. Grievance Officer

A designated Grievance Officer shall be appointed as part of Senior Management. Every office other than the corporate office shall also have an officer nominated as grievance officer of the respective office. Accordingly, the hierarchy of the grievance officers in ManipalCigna will be as under:

- (a) Complaints Head as Grievance Redressal Officer
- (b) One Grievance Redressal Officer at each branch office

#### 3.2. Receiving Grievances

Customers can approach the company through the following mediums for registering their grievances:

**Level 1:** Customers can connect with our Health Relationship Managers by

- 1. Calling our Toll-Free Helpline: 1800-102-4462
- 2. Or write to us at: [headcustomercare@manipalcigna.com](mailto:headcustomercare@manipalcigna.com)
- 3. Can submit letter to us at:  
Grievance Management Cell  
ManipalCigna Health Insurance Company Limited  
Techweb center 2nd Floor New Link Rd, Anand  
Nagar, Jogeshwari West, Mumbai, Maharashtra  
400102.
- 4. Visit us at any of our Branches (address of branches available on our website)

#### **Escalation Mechanism**

If the resolution provided does not meet customer's expectations, he may escalate the grievance at the levels mentioned below.

#### **Level 2**

The customer can write to our Grievance Redressal Officer at [complaints@manipalcigna.com](mailto:complaints@manipalcigna.com)

#### **Level 3**

If the customer is not satisfied with the resolution provided, then the customer can write to our Chief Grievance Redressal Officer at [compliance@manipalcigna.com](mailto:compliance@manipalcigna.com)

#### Level 4

If the channels above have still not met the expectations, the customer may approach the insurance ombudsman, the office Name and address details applicable for their state's can be obtained from the CIO (Council of insurance ombudsman) website.

The customer may also approach the Insurance ombudsman if the complaint is open for more than 30 days at any of the above levels.

### **3.3. Registration of Grievances**

The grievance received from the Customer shall be registered in CRM system and unique number known as Complaint number will be allotted to the grievance.

Effective 29th December 2017, we have transitioned to CRM, the complaints received at IGMS, are auto synchronized to the company CRM. Similarly, all the grievances received at company touch points and registered in CRM are auto synchronized with IGMS.

IGMS has been replaced by Bima Bharosa effective 17<sup>th</sup> July 2022.

### **3.4. Acknowledgement of Complaints**

- (a) All grievances will be given acknowledgement receipt immediately on receipt of grievance.
- (b) All couriers will be answered/acknowledged from the Grievance Management Cell

### **3.5. Process for Disposal of Grievances**

Once the Grievance is logged into the CRM system with a unique SR number, the grievance will be reviewed in detail and a resolution will be provided as per the nature of the grievance and the following procedure shall be followed:

- (a) A written acknowledgment shall be sent to the complainant immediately from the date of receipt of grievance.
- (b) The acknowledgment letter shall be signed by the authorized official along with his/her name, designation and contact details.

The acknowledgement letter will detail the grievance redressal procedure and the time needed to resolve the grievance.

In respect of grievances shall be resolved within 14 days of its receipt and ManipalCigna shall arrange to forward the final resolution will be communicated to the complainant.

The resolution letter will redress or reject the grievance and the reasons for the same will be advised to the complainant.

The complainant will also be advised that if no reply is received from the complainant within 60 days from the date of receipt of response from ManipalCigna the grievance will be treated as closed.

The company will advise the complainant to approach the Insurance ombudsman if his/her complaint is open for more than 30 days from the date of filing the complaint.

Once the grievance is closed, a summary of the resolution shall be recorded in CRM system. This will help in tracking the grievances logged along with the resolution comments.

The complaint shall be considered as disposed of and closed when ManipalCigna:

- (a) Has acceded to the request of the complainant fully.
- (b) Where the complainant has indicated in writing, acceptance of response.
- (c) Where the complainant has not responded within 60 days from the date of company's written response.
- (d) Where the Grievance Officer has certified that ManipalCigna has discharged its contractual, statutory and regulatory obligations thus closing the complaint.

### **3.6. Categorization of Grievances**

Grievances shall be categorized as prescribed by the regulatory authority from time to time and the same shall be incorporated in the system.

Though all the grievances will be treated fairly and transparently, some grievances require special attention and shall be categorized as well as prioritized for prompt attention.

- (a) Sales related complaint: Any malpractice or misrepresentation done by the sale representative will be classified as sales related complaint.
- (b) Service related complaint: Any deficiency of service and deviation of service level will be classified as service-related complaint.

### **3.7. Review Mechanism**

The Grievances which are addressed directly to the CEO/MD of ManipalCigna, and issues brought to the forefront are serious; a detailed report on the issue shall be prepared and submitted to the top management. The report will consist of the reason for grievance, action taken and any further action which needs to be initiated. Detailed report on grievances should be submitted to the Policy for Policyholder Protection, Grievance redressal and claims monitoring committee of ManipalCigna.

A Monthly report shall be sent to the top management, which consists of total grievances received/resolved and pending along with their category.



**3.8. Root Cause Analysis**

Root cause analysis shall be performed on quarterly basis with a view to evaluate the processes and systems and to find out any areas of improvement. Appropriate actions shall be taken based on the results of the root cause analysis.

**3.9. Increasing Awareness about Grievance Redressal Process**

- (a) Proper training and regular updates regarding the grievance process shall be provided to all, to empower them to service customers in the most empathetic manner. IRDA has prescribed minimum service level Turnaround Time for various service related activities and the same shall be displayed to the customers in all the offices as per the requirements of the regulator.
- (b) The policy shall be reviewed annually or as per change in IRDA regulation to ensure regulatory compliance.
- (c) Providing escalation matrix to the customer in case the customer is dissatisfied with the decision provided.

#### 4. Bare Act

Ref: 3/CA/GRV/YPB/10-11

##### Re: GUIDELINES FOR GRIEVANCE REDRESSAL BY INSURANCE COMPANIES

Further to Regulation 5 of IRDA Regulations for Protection of Policyholders Interests, 2002 which provides for insurers to have in place speedy and effective grievance redressal systems, and in terms of the Authority's powers and functions as enunciated in Section 14 of IRDA Act, 1999, the IRDA hereby issues the following guidelines pertaining to minimum timeframes and uniform definitions and classifications with respect to grievance redressal by insurance companies.

These guidelines are applicable for disposal of "grievances/complaints" as defined herein. All insurers shall ensure that the guidelines of the Authority are followed strictly.

##### 1. Definition of "Grievance/Complaint":

There shall be a uniform definition of "Grievance or Complaint". Grievances shall be clearly distinguished from Inquiries and Requests, which do not fall within the scope of these guidelines.

The following definition of grievance shall be adopted:

**Grievance/Complaint:** A "Grievance/Complaint" is defined as any communication that expresses dissatisfaction about an action or lack of action, about the standard of service/deficiency of service of an insurance company and/or any intermediary or asks for remedial action.

On the other hand, an Inquiry and Request would mean the following:

**Inquiry:** An "Inquiry" is defined as any communication from a customer for the primary purpose of requesting information about a company and/or its services.

**Request:** A "Request" is defined as any communication from a customer soliciting a service such as a change or modification in the policy.

##### 2. Grievance Redressal Policy:

Every insurer shall have a Board approved Grievance Redressal Policy which shall be filed with IRDA.

##### 3. Grievance Officer/s:

Every insurer shall have a designated Grievance Officer of a senior management level. Senior Management would mean either the CEO or the Compliance Officer of the company. Every office other than the Head/Corporate/Principal officer of an insurer shall also have an officer nominated as the Grievance Officer for that office.

**4. Grievance Redressal System/Procedure:**

Every insurer shall have a system and a procedure for receiving, registering, and disposing of grievances in each of its offices. This and all other relevant details along with details of Turnaround Times (TATs) shall be clearly laid down in the policy. While insurers may lay down their own TATs, they shall ensure that the following minimum timeframes are adopted:

- (a) An insurer shall send a written acknowledgement to a complainant immediately of the receipt of the grievance.
- (b) The acknowledgement shall contain the name and designation of the officer who will deal with the grievance.
- (c) It shall also contain the details of the insurer's grievance redressal procedure and the time taken for resolution of disputes.
- (d) Where the insurer resolves the complaint within 3 days, it may communicate the resolution along with the acknowledgement.
- (e) The insurer shall resolve the grievance within 14 of its receipt and send a final letter of resolution.

Where, within 14, the company sends the complainant a written response which offers redress or rejects the complaint and gives reasons for doing so,

- (i) The insurer shall inform the complainant about how he/she may pursue the complaint, if dissatisfied.
- (ii) The insurer shall inform that it will regard the complaint as closed if it does not receive a reply within 8 weeks from the date of receipt of response by the insured/policyholder.

Any failure on the part of insurers to follow the above-mentioned procedures and timeframes would attract penalties by the Insurance Regulatory and Development Authority.

It may be noted that it is necessary for each and every office of the insurer to adopt a system of grievance registration and disposal.

**5. Turnaround Times:**

There are two types of turnaround times involved.

- (i) The service level turnaround times, which are mapped to each classification of complaint (which is itself based on the service aspect involved).
- (ii) The turnaround time involved for the grievance redressal.

As to (i), the TATs are as mapped to the classification and prescribed by the Authority to insurers. These TATs

reflect the time-frames as already laid down in the IRDA Regulations for Protection of Policyholders Interests and more, as, wherever considered necessary (for certain service aspects not getting specifically reflected in the Regulations), specific TATs are indicated in the classification and mapping provided by the Authority.

As regards (ii) above, the minimum TATs required to be followed shall be as prescribed in guideline 4 (a) to (g) as prescribed above.

**6. Closure of grievance:**

A complaint shall be considered 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 insurer.
- (c) Where the complainant has not responded to the insurer 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. Categorization of complaints:**

- a) Categorization of complaints as prescribed by the Authority from time to time shall be adopted by insurers and incorporated in their systems.
- b) The present classification prescribed by the Authority is placed at Annexure A. All insurers shall provide for these classification categories in their respective systems.

**8. Minimum software requirements:**

It is necessary for insurers to have automated systems that will enable online registration, tracking of status of grievances by complainants and periodical reports as prescribed by IRDA. The system should also be one which can integrate seamlessly with the Authority's system in the manner prescribed by the Authority. The Authority shall define these requirements from time to time and insurers shall ensure that they provide for such software/system modifications as may be required. The objective is to create the required industry level database and systems that would enable speedy and effective redressal of complaints.

**9. Calls relating to grievances:**

Insurers shall also have in place a system to receive and deal with all kinds of calls including voice/e-mail, relating to grievances, from prospects and policyholders. The system should enable and facilitate the required interfacing with IRDA's system of handling calls/e-mails.

**10. Publicizing Grievance Redressal Procedure:**

Every insurer shall publicize its grievance redressal procedure and ensure that it is specifically made available on its website.

**11. Policy of Policyholder Protection, grievance redressal and claims monitoring committee:**

Every insurer that ensures that the Policy of Policyholder Protection, grievance redressal and claims monitoring committee, as stipulated in the guidelines for Corporate Governance issued by the Authority, is in place and is receiving and analyzing the required reports from the management and is carrying out all other requisite monitoring activities.