



Rajkot Peoples Co-operative Bank Ltd.

CREDIT INFORMATION REPORT POLICY

Sr. No.	BOD Meeting Date	Resolution No.	Review/Modification
01	21.11.2023	13	Implementation

Rajkot Peoples Co-operative Bank Ltd. – Credit Information Report Policy

Policy on Payment of Compensation to customers for delayed updation / rectification of credit information.

(Reference : RBI/2023-24/72 DoR.FIN.REC.48/ 20.16.003/2023-24 dated 26.10.2023 and RBI/2023-24/73 DoR.FIN.REC.49/20.16.003/2023-24 dated 26.10.2023)

As per provisions of Credit Information Companies (Regulation) Act, 2005(CICRA 2005) the RBI has advised to the banks to implement the compensation framework for delayed updation / rectification of credit information by banks and CICs as detail below:

1	Complainant (Customer) shall be entitled to a compensation of Rs.100 per calendar day in case their complaint is not resolved within a period of thirty (30) calendar days from the date of the initial filing of the complaint by the customer with bank/Credit Information Company (CIC).	
	i	The customer may request a CIC or bank to update the credit information by making an appropriate correction, addition or otherwise, and on such request the bank or CIC shall take steps to update the credit information within thirty (30) days after being requested to do so.
	ii	The bank shall forward the corrected particulars of the credit information to the CIC or customer within a period of twenty-one (21) days from the date when the bank was informed of the inaccuracy in the credit information.
	iii	The bank and the CIC shall have, collectively, an overall limit of thirty (30) days to resolve/ dispose of the complaint. That means bank would get twenty-one (21) days and CICs would get the remaining nine (9) days for complete resolution of the complaint.
A	The bank shall pay compensation to the customer if the bank has failed to send updated credit information to the CICs by making an appropriate correction or addition or otherwise within twenty-one (21) calendar days of being informed by the customer or a CIC.	
B	A CIC shall pay compensation to the customer if the CIC has failed to resolve the complaint within thirty (30) calendar days of being informed by the customer or the bank, despite the bank having furnished the updated credit information to the CIC within twenty-one (21) calendar days of being informed by the customer or the CIC.	
C	The customer shall be advised by the bank/ CIC of the action taken on the complaint in all cases, including the cases where the complaint has been rejected. In cases of rejection, the reasons for rejection shall also be provided by the bank and CIC.	
D	Compensation to be provided by the CICs/ bank to the customer (for delayed resolution beyond thirty (30) calendar days of filing the complaint) shall be apportioned among the banks/ CICs concerned proportionately. As per illustrative examples given in Annex of the captioned circular No. 72	
E	Where the grievance/ complaint involves inaccurate credit information provided by more than one bank, the complaint shall be registered by the customer with the concerned CIC. The CIC shall coordinate with all the banks concerned and furnish the customer with a comprehensive resolution of the grievance.	

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F	Where the complaint has been received and registered by a CIC and there has been a delay in the resolution of the complaint, the CIC shall inform the concerned bank(s) and the customer after the final resolution, regarding total delay (in calendar days) and the amount of compensation to be paid by the bank(s) and/ or CIC.						
G	Where the complaint has been received and registered by the bank and there has been a delay in the resolution of the complaint, the bank shall inform the concerned CIC(s) and the customer after the final resolution, regarding total delay (in calendar days) and the amount of compensation to be paid by the bank and/ or CIC(s).						
H	The date of the resolution of the grievance shall be the date when the rectified Credit Information Report (CIR) has been sent by the CIC or bank to the postal address or email ID provided by the customer.						
I	The CICs/ banks shall make appropriate provision in their complaint submission format (both online and offline) for enabling the customer to submit the contact details, email ID, and bank account details/ Unified Payment Interface (UPI) ID for crediting the compensation amount. The onus of providing accurate details will lie with the customer and the banks/ CICs will not be held responsible for any incorrect information provided by the customer.						
J	The compensation amount shall be credited to the bank account of the customer within five (5) working days of the resolution of the complaint.						
K	The customer can approach RBI Ombudsman, under the Reserve Bank - Integrated Ombudsman Scheme, 2021, in case of wrongful denial of compensation by banks or CICs.						
L	In case of wrongful denial of compensation by banks which are yet to be covered under the Reserve Bank - Integrated Ombudsman Scheme, 2021, the customer can approach Consumer Education and Protection Cell (CEPC) functioning from Regional Offices (ROs) of Reserve Bank of India.						
M	Non-Maintainability: The compensation framework shall not be applicable in the following cases:						
	<table border="1"><tr><td>i</td><td>Disputes for which remedy has been provided under Section 18 of CICRA, 2005. The Section 18 of CICRA, 2005 provides that for disputes arising amongst, CICs, banks, borrowers, and clients on matters relating to the business of credit information and for which no remedy has been provided under CICRA, 2005, such disputes shall be settled by conciliation or arbitration as provided in the Arbitration and Conciliation Act, 1996.</td></tr><tr><td>ii</td><td>Complaints/ references relating to (a) internal administration, (b) human resources, (c) pay and emoluments of staff, and (d) references in the nature of suggestions and commercial decisions of the CIC/bank.</td></tr><tr><td>iii</td><td>Complaints pertaining to disputes/ grievances regarding the computation of the credit score/ credit score model.</td></tr></table>	i	Disputes for which remedy has been provided under Section 18 of CICRA, 2005. The Section 18 of CICRA, 2005 provides that for disputes arising amongst, CICs, banks, borrowers, and clients on matters relating to the business of credit information and for which no remedy has been provided under CICRA, 2005, such disputes shall be settled by conciliation or arbitration as provided in the Arbitration and Conciliation Act, 1996.	ii	Complaints/ references relating to (a) internal administration, (b) human resources, (c) pay and emoluments of staff, and (d) references in the nature of suggestions and commercial decisions of the CIC/bank.	iii	Complaints pertaining to disputes/ grievances regarding the computation of the credit score/ credit score model.
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ii	Complaints/ references relating to (a) internal administration, (b) human resources, (c) pay and emoluments of staff, and (d) references in the nature of suggestions and commercial decisions of the CIC/bank.						
iii	Complaints pertaining to disputes/ grievances regarding the computation of the credit score/ credit score model.						

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	iv	Complaints that have been decided by or are already pending in other fora such as Consumer Disputes Redressal Commission, Courts, Tribunals, etc.
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The above compensation framework shall come into effect (from 25.04.2024) six (6) months from the date of this circular i.e. 26.10.2023. The CICs and banks shall have to put in place necessary systems and processes to implement the compensation framework within this period.

2	Reserve Bank of India has directed CICs and banks to implement the directions as detailed below:
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	2.1	Intimation of access to Credit Information Report and updation of credit information with Credit Information Companies
	a	Bank shall send alerts through SMS/ email to customers while submitting information to CICs regarding default/ Days Past Due (DPD) in existing credit facilities, wherever the mobile number/email ID details are available.
	b	Banks are advised to organise special awareness campaigns to sensitise their customers about benefits of submission of their mobile numbers/ email IDs.
	2.2	Setting up of Nodal points/ officials by banks
	a	Banks shall have a dedicated nodal point/ official of contact for CICs for redress of customer grievances. Details of the nodal point/ official along with email ID and telephone/ mobile number shall be furnished by banks to CICs.
	b	Banks shall inform CICs of any changes in the nodal points/ official within five (5) calendar days of such a change.
	2.3	Root Cause Analysis of the Complaints by Cis
	a	Banks shall undertake Root Cause Analysis (RCA) of the customer grievances <u>at least on a half yearly basis.</u> Banks shall also use, among others, information on data rejected by the CICs and Data Quality Index (DQI) provided by CICs as sources of information for carrying out RCA.
	b	Analysis of the RCA shall be reviewed by the Top Management of banks, at least, <u>on an annual basis.</u>
	2.4	Reasons for rejection of requests for data correction by banks
	a	Banks shall inform the customers the reasons for the rejection of their request for data correction, if any, to enable such customers to better understand the issues in the CIR.
	b	A list of reasons for rejection of requests shall be circulated by CICs to all banks. Banks shall use the same while communicating the rejections of the request for data correction made by customers/ CICs during the grievance redress process.

The above directions shall come into effect (from 25.04.2024) six (6) months from the date of this circular i.e. 26.10.2023. The CICs and banks shall have to put in place necessary systems and processes to implement the directions within this period.

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3	Considering the above directions of RBI our bank has to take the following actions for effective implementation:	
3.1		Bank shall have to take immediate action on receipt of complaint from the borrower within 21 days on discrepancy in the credit information report of the borrower and rectified details in the report shall immediately be submitted to the respective credit information company to avoid payment of compensation @ Rs.100/- per day for the delayed period.
3.2		Bank shall have to take immediate action on receipt of any query from CIC and to be submitted corrected information to the CIC immediately.
3.3		If correction in the report is rejected either by the bank or by respective CIC the reasons of rejection and measures taken by the bank should also be informed to the customer immediately (<u>within five day</u>) either by post, SMS or Email ID registered with the bank.
3.4		When corrected credit information report is received from the CIC the bank shall inform to the borrower immediately (<u>within five day</u>) either by post, SMS or Email ID registered with the bank.
3.5		Bank has to nominate an officer as nodal point official of contact for credit information companies for redress of customer grievances and his email id and telephone/mobile number to be furnished to CICs.
3.6		Any change in the nodal point official should be informed to nodal point official within five day calendar days to the CICs.
3.7		Bank has to undertake Root Cause Analysis(RCA) at least <u>on a half yearly</u> basis of the customer grievances by using information on data rejection and data quality index provided by CICs and to be reviewed by board of the bank <u>on annual basis</u> .
3.8		The branches and head office have to maintain the registers as advised by RBI and disclose the information as per formats on website by the bank.
3.9		Bank has appointed Mr. Viral B. Jani as nodal point official for the above purpose. His contact number is 9925049927 and his email id is viraljani11@yahoo.com
3.10		Bank shall provide a complaint submission format(Both online & offline) for enabling the customer to submit contact details, Email ID and bank account details/UPI ID for crediting the compensation amount.
3.11		Bank shall send alerts through SMS/ email to customers while submitting information to CICs regarding default/ Days Past Due (DPD) in existing credit facilities, wherever the mobile number/email ID details are available.
3.12		Banks are advised to organise special awareness campaigns to sensitise their customers about benefits of submission of their mobile numbers/ email IDs.