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Standard operating procedures for grievance redressal prepared by the India Edtech Consortium (IEC)

The manner, form and delivery of education is being enabled by technology and digital solutions. Thus, it is pertinent to recognize that digital transformation is key to driving effective and impactful socio-economic inclusion cutting across barriers to enhance access, equity and greater democratization.

Imparting of knowledge, education and skills are the universal principles which bind a society seeking holistic growth. Technology is the golden thread which positions stakeholders to effectively implement solutions at scale, fulfilling these obligations in a more socially conducive manner and work towards nation building.

The Indian Edtech ecosystems aims to synchronize this understanding by seeking a value driven relationship with learners in a sustainable and meaningful manner. Thus, entities operating in this space must uphold the highest standards of quality, professional ethics and in furtherance of the principles work towards a streamlined and codified set of procedures and working principles.

Being mindful of the same the following Standard Operating Procedure (“SOP”) has been designed and developed by the India Edtech Consortium (“IEC”) which is an industry driven self-regulatory body.

The learner centric approach in education services is facilitating a deeper engagement for each learner which is truly unique. Technology and digital solutions are the fundamental pillars for delivering these services in a cost-effective and scalable manner.

This interface is driving the adoption of a hybrid/ blended learning system. Being mindful of this context, the SOP seeks to constitute a well-defined framework mechanism for enhancing learner experience and re-enforcing industry wide standards.

The Standard Operating Procedure (“SOP”) shall apply to any entity (“Edtech service provider”) that:

- a. Imparts education whether in Pre-K, K-12, higher education, test preparation, language, teacher training, skill development of professional education segment and;
- b. Provides education over the internet or computer networks, directly or indirectly, within the territory of India, whether or not incorporated in India.

Note:

The SOP shall be strictly applicable to education services offered over and provided on video aggregation websites, OTT communication platforms like VoIP services, video telephony platforms, social media networks, e-commerce portals, content platforms etc.

General Guidelines:

All Edtech service providers shall strictly adhere to the following:

i. Grievance management

- a. Edtech service providers are advised to become a partner in the convergence process of the National Consumer Helpline (NCH) portal of the Central Government;
- b. As prescribed by the Consumer Protection Act, 2019 and Rules thereof, and in consonance with this SOP, Edtech service providers shall appoint a Grievance officer (“GO”) and implement a grievance management mechanism at the platform level.

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- c. To facilitate the grievance process and ease of consumer access, it is advised that a grievance redressal form can be developed and prominently displayed on the Edtech service providers

ii. Compliance

- a. Appoint a Compliance officer (“CO”) to oversee generally - the functioning of the grievance mechanism and implement the working principles and SOP in an effective and time bound manner in coordination with the Grievance Officer;
- b. Display contact information (Name, email and contact number) of Grievance Officer, Compliance Officer along with the customer care contact in a prominent manner on the website/ app and any other marketing / promotion material;
- c. Display contact information and hyperlinks regarding access to the NCH portal and the India Edtech Consortium in a prominent manner;
- d. Display prominently relevant information regarding refunds policies and cancellations in an easy-to-understand manner on the website/app;
- e. Edtech service providers shall submit a self-certification checklist (provided under Annexure – 1) to the IEC Secretariat annually. Edtech service providers shall submit the self-certification within 30 days from offering services to the general public.

iii. Reporting and monitoring

- a. Platforms shall collate information of grievances received and resolved on a monthly basis and submit the same along with a self-certification to the IEC Secretariat;
- b. The consolidated information on grievances shall be shared with the IEC Secretariat by the 7th of every following month, the IEC shall share anonymized and consolidated data by the 15th of the month with the Ministry of Consumer Affairs;
- c. Any complaints received on the Edtech service providers must be communicated in this report along with the number and nature of complaints received on NCH for better oversight and monitoring.

Working principles under the SOP:

The Edtech service providers are advised to incorporate the following principles/ practices and address any grievances arising from the same.

i. Appropriate/Ethical Sales Practices

The Principles

- *What is told is what is actually served.*
- *No misrepresentation about the products/services/programs be made by the organizations.*
- *No invalidated claims be made during the service process.*
- *Backup data for claims should be available with relevant statistics.*
- *To add credibility and trust, examples given of successful students who have used Edtech product need to be authentic with validated proof of performance.*

Suggestive Practices (As applicable) for Edtech Companies -

- i. Misrepresentation about products/services should be clearly defined in the Service SOPs.

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- ii. Internal SOP dealing with misrepresentation/deception, if any, be maintained.
- iii. The action against the responsible person should be clearly explained in internal SOPs and the want of service be mapped against the concerned teams/individual admission counsellors. Action taken report to be shared with IEC in an anonymised format for violation of these principles.
- iv. Any action taken against any person should be reported to IEC anonymously.
- v. There should be specific and regular training on the same for such serving teams.
- vi. QA and QC Cells should be established defining SOPs and monitoring the communication that is being made during the service process.
- vii. The product/service/program specifics and pre-requisites should be mentioned in communications to the learner, wherever appropriate.
- viii. There should be provision for disincentives and penalties for any want of service and other unfavourable behaviour or information given to the prospect during the service process.
- ix. Every advertisement of successful candidates must substantiate the product or service they used to give credibility to the claim of success.
- x. Learners' querie(s), complaints and escalations for each product/service/program should be recorded giving specific particulars.
- xi. It is strictly advised that there shall be no service related communication from personal numbers.

ii. Marketing Communication

The Principles –

- *Industry should aim for ethical and transparent communication;*
- *If you advertise directly to minors or market minor-related products to their parents, it's important to comply with truth-in-advertising standards.*
- *Avoid targeting competitor in promotions in a negative light.*

Suggestive Practices (As applicable) for Edtech companies-

- i. Members should ensure ethical practices in marketing and advertising as mentioned in ASCI and prevent misleading claims (Link – https://ascionline.in/images/pdf/code_book.pdf)
- ii. Best practices for the consumer endorsements, expert endorsements, endorsements by organisations and disclosure for the material connection should be followed.
- iii. Promotional Discounting should be taken up in a transparent and visible manner and not in small fonts
- iv. The legal terms of qualifications being awarded such as MBA, BBA etc. should be used in the advertisements only when it is compliant with the UGC/AICTE guidelines.
- v. Internal communication guidelines and approval process for all the channels (digital, telemarketing, TV, print and radio) should be made by the member organisations on the lines of the best practices followed in the industry.
- vi. The advertisement by any Edtech service provider must not create a false narrative that the course offered by the Edtech Institution is recognized, authorized, accredited, approved, registered, affiliated by any regulatory agency, ministry or by the Government.
- vii. A clear distinction should be made to ensure that students are not made to believe that they are earning a formal qualification (Diploma, degree) when it is not

Explanatory Note:

Differences and distinction between offline courses and those offered online must be explained clearly and displayed prominently in all marketing and sales communication. This may be done with the help of a sample certificate – pertaining to the respective course.

iii. Robust Financing / Loans / Refunds

The Principles

- *Industry should aim for transparent and clear-communication and consumer awareness of all financial policies including loans, financing, payment terms and refunds.*

Recommended Practices for Edtech service providers-

- Frame rules and develop standards for payments processing, refunds, trial periods, money back guarantee etc.
- Policies should be displayed regarding the refund and cancellation prominently on the user interface platform in a manner that cannot be missed.
- Loans and other financing FAQs should be clearly mentioned on the platform in a manner that cannot be missed.
- Multiple communication channels should be used to make the learner/parent aware of the policies.
- The standard issues and Frequently Asked Questions (FAQs) of financing should be clearly communicated with examples to the learner/parent.
- All the documents related to financing should be signed by the learner/parent and the records should be kept.
- Any third party appointed by the Platform to deal with learners/ parents and users shall strictly adhere to the SOP. The Platform shall ensure that such third party and their contractors/ employees are provided necessary training and working knowledge as outlined in the SOP. Edtech service providers shall be responsible for non-compliance and violation of the SOP by their appointed third party.

Operational mechanism

It is noted that due to lack of codified - uniform industry wide standards and their applicability, consumers often directly share grievances with government ministries/portals. This not only creates multiplicity of complaints but also increases the burden leading to less effective and inefficient grievance mechanism.

In certain cases, consumers are also led to unauthorised and malicious web portals where the complaints are registered, and their private and sensitive personal information is put up for public display. This not only exposes them to potential harm of cyber-frauds but also patently violates their privacy as this data may pertain to minors.

We also note that emerging models of hybrid education such as blended learning require a much more enabling and facilitative mechanism. In light of the above, it is essential to constitute a robust framework which shall align the interests of all stakeholders in a more transparent manner.

The India Edtech Consortium (“IEC”) is a self-regulatory body which comprises of nearly 95% of the B2C Edtech ecosystem in India. The Independent Grievance Review Board (“IGRB”) is an essential and independent arm of the IEC and is chaired by **Dr. Justice B.S. Chauhan**, Former Judge, Supreme Court and Former Chairman, Law Commission of India along with **Dr. Aruna Sharma**, Former Secretary, Government of India, **Mr. Anand Sudarshan**, Founder, Sylvant Advisors, **Mr. Raj Nayak**, Founder & MD

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House of Cheer Networks & **Mr Gopal Jain**, Senior Advocate, Supreme Court of India as independent expert members and **Mr Mohan Lakhmraju**, Founder & CEO, Great Learning & **Mr Karandeep Singh**, CFO, Simplilearn as representatives of the industry.

The IEC has been working towards the adoption of uniform industry wide standards for the Edtech ecosystem in India. IEC through its members has not only resolved nearly 5000 complaints since its inception in January 2022 but also issued advisories and guidance to members to ensure effective compliance and management with regulatory structures and policies.

Therefore, the IEC is well poised to be a partner in progress for the effective, robust and transparent implementation of the SOP simultaneously working towards the enablement and growth of the industry.

Processing of complaints at the level of the Platform:

At the first instance the grievances should be directed to the Edtech service providers for redressal. NCH should act as the nodal agency between any complaints received by the relevant ministries and departments and the Edtech service providers.

Note: Since all Edtech service providers have to be registered with the NCH portal as convergence partners, wherever the grievance has been addressed to anyone other than the platform at the first instance shall be re-directed to the platform for redressal.

1. Any aggrieved consumer may file a complaint with grievance officer appointed at Tier 1 (Edtech service providers).
2. The GO shall ensure that every grievance with complete information should be acknowledged within 48 hours from the date of receipt of the complaint. No anonymous and/or pseudonymized complaints will be entertained.
3. If the GO is of the view that the grievance in issue is consistent with the Code of Conduct, then it may appropriately reply to the complainant within maximum fifteen (15) working days from the date of receipt of the complaint. In case more time is required to ascertain if the content complained is consistent with the Code of Conduct or not, then the GO shall appropriately reply to the complainant indicating timelines within which the GO anticipates it to be able to respond to the complaint. For clarity, any consumer grievance will be redressed not later than thirty (30) days from the date of receipt of the complaint.
4. In case of a violation of this Code of Conduct, the GO must communicate to the aggrieved person within thirty (30) days of receipt of the complaint, specifying the remedial action(s) and/or such action(s) taken to appropriately address the complaint.

Processing complaints under the India Edtech Consortium:

IEC is an industry driven self-regulatory body to ensure that every grievance is addressed and given due diligence within a stipulated time frame.

Where the consumer is not satisfied with the redressal provided by the Edtech service providers and it pertains to the Working Principles as outlined in Part -2 of this SOP, they shall have the option of approaching the India Edtech Consortium.

1. The grievance shall be escalated in writing with relevant supporting documents to India Edtech Consortium either on email (**grievance@indiaedtech.in**) or through an automated web portal (**www.indiaedtech.in/file-a-grievance**).

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2. The Secretariat of India Edtech Consortium would conduct a preliminary assessment within five working days of registration of complaint, making such review as necessary to reach an informed decision as to the alleged violation of the Working Principles.

3. There shall be a Screening Committee which shall respond to the Complainant in writing within five days of registration of the complaint, recording reasons due to which the complaint is devoid of merit and recommending that the grievance be closed.

4. Where the Complainant wishes to further pursue their grievance, they would need to respond accordingly within 5 days of receiving the response. The grievance shall be forwarded to the Independent Grievance Review Board (IGRB).

The IGRB shall generally oversee and ensure the alignment and adherence by the IEC members to the Code of Conduct and provide guidance/ advisories on various aspects of the Code of Conduct.

In case the grievance is still not resolved successfully, the same maybe escalated to the Central Consumer Protection Authority (CCPA) while informing the IGRB.

Attached Annexures:

Annexure – 1 Self-certification Checklist for Edtech service providers

Annexure – 2 ASCI guidelines

Annexure – 3 SOP mechanics PPT

Annexure – 4 Affirmation of Support by the Working Group of IEC

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Annexure 1 – Self Certification Checklist (attached)

Name of the Entity:			
Name and Contact details			
<p>a. Grievance Officer: b. Compliance Officer:</p>			
S.No.	Nature of Compliance	Complied (Yes/No)	Prescribed by
1	Overall compliance		
i	Set up an internal complaint forum as provided by the PIB circular dated 23.12.2021 and generally comply with the contents therein		Ministry of Education Consumer Protection Act, 2019 s
ii	Appointment of a Grievance Officer and Compliance Officer for receiving grievances related to Code of Ethics		Consumer Protection Act, 2019 and SOP
iii	Display name and contact details of Grievance Officer & details related to the Grievance Redressal Mechanism on website/interface		Best practices for compliance with SOP – Working Principles
iv	Upload copy of the SOP for public information on the website/ platform		Best practice for compliance with SOP – Working Principles
v	Display prominently – a grievance redressal section on the website/ platform with appropriate information and link to the IEC Website		Best practice for compliance with the SOP – Working Principles

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vi	Incorporate the following into public facing communications such as e-mail and text messages regarding grievance redressal "The India EdTech Consortium has been constituted to address grievances relating to ethical service of quality education, marketing communication and robust financial transactions - loans, refunds etc. If you are not satisfied with the response please visit www.indiaedtech.in "		Best Practice for compliance with the SOP – Working Principles
vii	Generally observe, adhere and follow the SOP		Best Practices
2	Training and Sensitization		
i.	Provide every half yearly training and sensitization to service, marketing and consumer care divisions and any other teams and resources which are engaging in public communication and other roles related to the key features of the IEC to impart quality education at affordable rates.		Best Practice in line with SOP
<p>This is to certify that the information given above is true and correct to the best of my personal knowledge, information and belief.</p> <p>For: Signature: Date of Certification:</p>			

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Annexure – 2 ASCI guidelines

Please refer to the ASCI guidelines available at https://ascionline.in/images/pdf/code_book.pdf

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Annexure – 3 SOP Mechanics

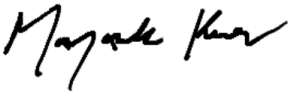
Stakeholders	<ul style="list-style-type: none">• Consumer - complainant• Tier - 1 (Internal Grievance Redressal Mechanism) of the Edtech service providers• Tier - 2 IEC• Tier - 3 CCPA	Mechanism <ul style="list-style-type: none">• File a complaint with the Tier 1 mechanism of the platform• Provide a resolution within 30 days from the complaint• If not satisfied with the resolution, consumer to approach Tier - 2 IEC• IEC to address complaints - violative of Working Principles of the SOP.• To perform function in a time bound manner• IGRB to hear and address complaint within 10 days from registration• IGRB to pass written reasoned order to ensure compliance with SOP• Complainant can escalate the grievance to Tier - 3 if he is not satisfied with the redressal by IGRB	Rationale/ basis <ul style="list-style-type: none">• Guidelines apply to all entities providing Edtech services through the internet• Provided as per the Consumer Protection Act, 2019, Ministry of Education PIB release and SOP• India Edtech Consortium (IEC) is a self-regulation body which has an Independent Grievance Review Board (IGRB) and a Screening Committee to process complaints• IEC Secretariat to monitor compliance with IGRB advisories/ orders.• IGRB can recommend the matter to CCPA where there is non compliance with its orders

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Annexure – 4 Affirmation of Support by the Working Group of IEC


The following signatories are the members of the working group constituted under the India Edtech Consortium for preparation of this document. The members collectively affirm their belief that the Standard Operating Procedure laid down herein will play a significant role in enhancing the commitment and responsibility of the Edtech ecosystem in India through adoption of best practices and uniform applicability.

DocuSigned by:

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1. Mayank Kumar
Chair – India Edtech Consortium
Co-founder & MD, upGrad

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3. G.V. Ravishankar
MD
Sequoia Capital India


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2. Divya Gokulnath
Co-Chair – India Edtech Consortium
Co-Founder & Director, BYJU'S


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4. Mahesh Peri
Founder & Chairman,
Careers360

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5. Krishna Kumar
Founder & CEO
Simplilearn

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6. Abhishek Dhasmana
IEC

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Statement of support from IGRB:

The Indian Edtech ecosystem offers vast potential for delivering accessible, quality education while ensuring greater value for learners. The IGRB is committed to ensuring a robust and effective implementation of this SOP to further enhance the trust and engagement with learners.

DocuSigned by:

B S Chauhan
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1. Dr. Justice B.S. Chauhan (Retd.)
Chairperson – IGRB
Former Judge - Supreme Court of India
Former Chairman, Law Commission of India
Chairperson - IGRB

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