**POLICY ON CUSTOMER EDUCATION**

**Branch Banking Department**  
**Financial Institution**  
*Reviewed by Board vide resolution dated [Date]*

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**1. Introduction**

With the advent of electronic banking, the customer's experience of banking is no longer fully under the control of the financial institution. With fraudsters constantly creating more diverse and complex fraudulent ruses using advanced technology and social engineering techniques to access their victims' accounts, spreading awareness among consumers becomes imperative. Continual education and timely information provided to customers will help them to understand security requirements and take appropriate steps in reporting security problems.

To generate a standard understanding of the evolving fraud scenarios, the institution intends to run awareness programs targeting the larger customer base. The institution shall also run awareness programs for various other stakeholders, including employees, who can then act as resource persons for customer queries, law enforcement personnel for more studied response to customer complaints and media for dissemination of accurate and timely information.

**2. Scope**

The scope of this customer education policy shall cover the following aspects:

• Planning, organizing and implementing a fraud awareness raising initiative • Framework to evaluate the effectiveness of an awareness program • Customer communication framework • Addressing potential risks associated with awareness initiatives • Development of a safe and secure culture by encouraging users to act responsibly and operate more securely

**3. Roles/responsibilities and organizational structure**

The institution shall identify and involve key stakeholders in decision-making, planning, implementation and evaluation in order to get desired support for the awareness program.

**a. Board of Directors/ Senior Management**

The Board of Directors/Senior Management shall be committed towards the process of consumer education initiatives by providing adequate resources, evaluating the effectiveness of the process and fine-tuning and improving customer education measures on an ongoing basis.

**b. Working group**

The working group shall do the following:

• Establish a clear goal for the endpoint, in consultation with key stakeholders. • Clearly define roles, responsibilities and accountabilities. • Communicate in an open, honest, clear and timely manner. • Allow for flexibility in approaches to suit different stakeholder needs. • Support with training and development to ensure a change in behaviour and culture. • Learn from previous and ongoing experiences and celebrate achievements.

**4. Customer education strategy**

**a. Defining 'Awareness'**

The institution shall consider security awareness as the basic component of its education strategy which tries to change the attitude, behavior and practice of its target audience (e.g. customers, general public, employees etc.).

Awareness activities shall be done on an ongoing basis, using a variety of delivery methods which shall focus on security aspects.

**b. Objectives of the awareness program**

The institution shall set up awareness programs to:

• Provide a focal point and a driving force for a range of awareness, training and educational activities • Provide general and specific information about fraud risk trends, types or controls to people who need to know • Help consumers identify areas vulnerable to fraud attempts and make them aware of their responsibilities in relation to fraud prevention • Motivate individuals to adopt recommended guidelines or practices. • Create a stronger culture of security with better understanding and commitment • Help minimize the number and extent of incidents, thus reducing costs directly (fraud losses) and indirectly (for example, reduced need to investigate)

**Approach for awareness programs**

The institution shall follow the below three stages for developing the awareness program:

**5. Planning and design**

The institution shall ensure that the content of the awareness programs is in the interest of its users and is relevant to their banking needs. In the planning and design stage, the institution shall:

• Establish a working group • Define goals and objectives • Define target group • Identify the needs of the target audience • Identify human and material resources required • Evaluate potential solutions • Select desired solutions and procedures • Obtain the organizational buy-in • Identify program benefits and obtain budgetary sanctions • Establish the priorities. • Prepare work plan and checklists along with the resource requirements, timelines and milestones • Define communication framework • Define indicators to measure the progress • Establish baseline for evaluation • Document learning • Periodic review of work plan as program progresses.

**6. Execution and management**

The institution shall focus on the following activities to implement the awareness program. In the execution and management stage, the institution shall:

• Nominate team members • Review work plan • Engage a suitable vendor for content creation and publication. • Launch and implement the activities • Document learning

**7. Evaluation and course correction**

The institution shall design and implement a well-calibrated feedback strategy for determining the effectiveness of the awareness program and ensuring continuous improvement. In the evaluation and course correction stage, the institution shall:

• Gather data • Collect feedback on communications • Assess effectiveness through number of events • Review program objectives • Make necessary changes in the plan

**a. Target audience**

The institution shall identify and segment the target users and customize the awareness program for the specific target groups.

The target groups for these programs shall include:

• Customers • Employees and consultants • Law enforcement agencies – Police, Judiciary and Consumer Forums • Fraud risk professionals • Media personnel • Channel partners and suppliers • General public of varying age and technical knowledge – children, youth, adults, senior citizens and silver surfers

**b. Stakeholder support**

The institution shall build consensus amongst decision makers and stakeholders for financial and administrative support for the awareness program. In this respect, the institution shall identify both fixed and variable costs which will include personnel, operation costs, awareness material, advertisements and promotions and maintenance of website.

**c. Communication framework**

As communication is crucial for the success of the awareness program, the institution shall consider the following key elements for its effective communication:

• Ability to reach out to a broad audience thereby maximizing the reach of the message • Not to be alarming or overly negative about a situation. If issues or risks need to be detailed, real world experiences shall be used to create a better understanding among the audience. • Deliver the right message content to the right audience using the most effective communication channels • The message shall state the risks and threats facing the users, why it is relevant to them, what to do and not to do, and finally how to be protected. • The message shall be compelling and clearly state why security is important. Users who understand why certain types of behavior are risky are most likely to take ownership of the issue and change their behavior.

**8. Communication content**

The institution's communications shall carry information related to various frauds in general with specific focus on electronic frauds through fake websites, phishing, vishing, skimming and emails.

The institution shall sensitize customers on the need to protect PINs, security tokens, personal details and other confidential data.

Customers shall be made aware of the secure practices to be followed while using electronic channels such as ATMs, internet banking and mobile banking.

When new operating features or functions, particularly those relating to security, integrity and authentication, are being introduced, the institution shall ensure that the customers have sufficient instruction and information to be able to properly utilize them.

Wherever mandated, the institution shall provide direct link to its website / 24\*7 customer support helpdesk for lodging customer complaints.

**9. Communication collaterals**

The institution shall create awareness building collaterals in the form of:

• Leaflets and brochures • Educational material in account opening kits • Safety tips in cheque books, PIN, account statements including E mail account statements and envelopes • Receipts dispensed by ATMs • DVDs with animated case studies and videos • Screensavers • Electronic newsletters • Short Messaging Service (SMS) texts • Recorded messages played during waiting period of phone banking calls

The institution shall create the collaterals in regional languages wherever required.

**10. Communication channels**

The institution shall establish more than one communication channel and use them to engage its customers successfully. The institution shall use any of the below channels:

• Advertising campaigns though print and TV media • Talk shows on television/radio • Customer meets and interactive sessions with specialists • Common website developed with content from all stakeholders • Online training modules and demos hosted on the website • Groups, games and profiles on social media • Advertisements on online shopping sites • Bill boards • Posters in prominent locations such as petrol pumps and popular restaurants • Interactive guidance in the form of help lines • ATM screens, Emails and SMS texts • Distance learning programs and demos • Corporate Website ("Customer Education Series " in the Home Page ) • Financial Literacy Centers / Counselors • Customer outreach meetings • Customer Education Messages (In advertisements/product brochures)

The institution shall ensure that the message delivered, the channels used and the sender of the message are influential and credible.

The institution shall use multipliers that can help communicate to a broad range of audience, including, but not limited to:

• Community centres • Schools and colleges • Computer and book stores • Libraries • NGOs • Clubs • Adult education centres • Social networking sites

**a. Research and analysis**

The institution shall form a research group to continually update the team with the latest trends and evolving modus operandi. The group shall maintain a repository of material such as:

Case studies Sample mails Sample of fraudulent documents Data collected from victims or targets of frauds International practices and developments

**b. Evaluation**

The institution shall evaluate the effects of various campaigns for specific target groups through qualitative (e.g. focus groups, interviews) and/or quantitative (e.g. questionnaires, omnibus surveys) methods.

The institution shall also conduct evaluation against metrics, performance objectives, etc. to check the campaign's effectiveness, and to establish lessons learned to improve future initiatives.