SATIN Creditcare Network Limited

Document Control

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Created by	Pravupada Pandit, Saurabh Mishra
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Revision History

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05/12/2022	2.1	Policy on Document Filing at the Branch	Pravupada, Shalini	Vikas Umrao	Anil Kwatra, Dhiraj Jha	27/03/2023
09/03/2021	2	Policy on Document Filing at the Branch	Pramitee, Prashant	Divyam Gupta	K Thangaraju, Divakar Jha	15/03/2021
01/06/2018	1	Policy on Document Filing at the Branch		Dev Verma	Dev Verma	01/06/2018

Statement of Confidentiality

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Objective:

This policy establishes guidelines to ensure the completeness and accuracy of loan documents, while also standardizing their storage and filing processes. It outlines the proper retention procedures for documents and the disposal of unnecessary materials, including obsolete records, scrap, and items deemed unusable. Additionally, the policy emphasizes the protection of borrower privacy by safeguarding sensitive information collected during the loan processing phase.

Scope:

This policy is applicable to all SCNL branches.

Updation of Policy:

This policy may be updated by the Process & Policy Department based on business requirements, with approval from the designated Authority/Committee, and will be communicated to all stakeholders. The company board shall review this policy annually.

Features:

1. Document Filing:

a) Filling at Branch Office:

There will be four files maintained at the branch. BM/ABM will be responsible for updating these files, and the BM should monitor the process and take necessary steps against deviation. These files will be:

S. No.	File Name	Content/Documents	Frequency
1	**Loan file (Box File)**	Photocopy of Borrower's Voter ID	Maintained daily, compiled monthly.
		Photocopy of Co-Insurer Voter ID	
		Photocopy of Bank Passbook Copy	
2	**Expenditure file**	Expenses & advances	Maintained daily, compiled monthly.
3	**Bank book file**	Deposit & Withdrawal	Maintained daily, compiled monthly.
		Deposit Slip	
		Cash-in-Transit	

b) Disbursement via E-sign:

- It is no longer mandatory to take a printout of the Sanction Letter cum Promissory Note (SLCPN) for disbursements processed through E-sign.
- However, it is important to note that all other KYC (Know Your Customer) documents, as per the standard procedure, must be filed and maintained for record-keeping purposes.
- It is the primary responsibility of the branch manager that every document, which is mentioned above (Know Your Customer) submitted have the loan ID and loan disbursement date on the Xerox copy before filing.

c) Points to be Taken Care of While Maintaining these Files:

- Record keeping frequency will be on a daily basis. Every day in the evening BM/ ABM will update the files.
- Date-wise sheets will be filed in respective files and the first day of the month will be the last sheet of the file.

2. Retention of Documents:

Document	Type	Concerned Dept.	Details	Status	Time Period	Reason
Bank Statement File	Files	Account	Monthly Bank Statements	To be retained	Up to 8 financial year	Accounting Records
Bills File	Files	Account	Electricity & Other Utility bills	To be retained	Up to 8 financial year	Voucher will have the payment receipts
Cash Book	Register	Account	All cash transactions are entered here	To be retained	Up to 8 financial year	Accounting Records
CDS	Files	Operations	Collection & Disburseme nt Sheet	To be scrapped	More than 2 financial years old	All loans were supposed to be closed
Courier Register	Register	Operations	Details of any inward & outward courier	To be scrapped	More than 2 financial years old	Internal Register
Death Documents File	Files	Insurance	DC copies, Payout approvals are kept in this	To be scrapped	Up to 8 financial years	Payout should have completed in 2 years
Fixed Assets Register	Register	Account	Account enters details of all fixed assets of the branch	To be retained	Up to 20 financial years	Internal Register
Key Register	Register	Ops	Staff enters safe key handover details	To be scrapped	More than 2 financial years old	Internal Register
Branch License File	Files	HR	Labor license is to be kept in the branch	To be retained	Permanent at Branch	
Lease Deed File	Files	Legal	Rent Agreement is maintained	To be retained	Up to 8 financial years post end of lease	Admin team will provide the lease agreement to legal team
Loan Documents	Loan Document	Ops	Loan Document	To be retained	8 years (from the end of its business relation with a borrower)	Loan Documents
Movement Register	Register	Ops	Staff enters daily movement details into this	To be scrapped	More than 2 financial years old	Internal Register
Policies File	Files	Ops	All policies are kept in this file	To be retained		
Staff Handover File	Files	Ops	Handover document is filled when staff transfer happens	To be scrapped	More than 2 financial years old	Internal Reports

Stationery register/Asset Register	Register	Ops	Details of stock of stationary & printing material	To be scrapped	Up to 8 financial years	Internal Register
TM/DRM Follow up Register	Register	Ops	TM/DRM enters visit details into this register	To be scrapped	More than 2 financial years old	Internal Register
Village Survey File	Files	Ops	Every village detail is captured in Village survey form	To be retained		Not in existence since 17th March 2018
Voucher File	Files	Account	All vouchers are kept in the branch	To be retained	Up to 8 financial year	Accounting Records

3. Process for Disposal of Documents:

a) Disposal at the Region Office

i. Approval Process:

- Admin at the region office must compile a list of all documents for disposal using the provided format.
- RO-Admin must obtain approval from the circle head before proceeding with the disposal. The same list has to be shared with HO Process team keeping SCM in loop.

ii. Disposal Team:

- The disposal team should consist of RM, admin, RC, and one member from the audit team.
- All team members must be present during the disposal and sale of items.

b) Disposal at the Branch Office

i. Approval Process:

- DRM at the branch office must create a list of documents for disposal using the provided format.
- DRM must obtain approval from the RM before proceeding with the disposal & share the list with HO Process team keeping SCM in loop.

ii. Disposal Team

- The disposal team should consist of admin, DRM and RM.
- Admin, DRM and RM must be present during the disposal and sale of items.

c) Financial Handling

- Money generated by selling documents must be part of the branch main cash and the respective accountant will make the entry in LMS accordingly.
- In the regional office, the entry will be recorded under the regional admin name in relation to the funds collected from the region document disposal activity.

d) Disposal Process

- All documents must be shredded/destroyed before selling.
- DRM and regional admin shall be accountable for any misuse of documents during the disposal process.
- The disposal process for branch and regional offices will be carried out annually, beginning each fiscal year; by 20th April, each year.

e) Disposal of Loan Documents

Loan documents must be disposed of in a manner that ensures no information is shared with a third party.

f) Training of the Documents Disposal Team

The training on VC must be conducted by the respective SCMs prior to the disposal of documents in the branch/region.

g) Reporting

- After selling the documents, the admin (Region Office)/DRM (Branch Office) must share details with the circle head, marking SCMs, RM, and ZM.
- The report must include details such as the weight of shredded stationery, the amount generated, and the date of sale.
- SCMs are required to send a monthly detailed report to the Head Office for each disposal activity.

4. Privacy & Security of Client Data:

- SCNL does not share information pertaining to its borrowers with anyone except Regulatory Authorities/others after due approval.
- All employees need to exercise due care to ensure that the information pertaining to our borrowers is kept confidential.
- Information should not be shared with any individual/organization without prior written approval from below mentioned approving authorities.
- Anybody found exposing/sharing borrower information with others without prior written approval from below mentioned approving authorities will be liable for disciplinary & legal action.

5. Post Disbursement Client Data Security:

- One almirah and filing rack are assigned to every branch.
- The key of the record-keeping almirah shall be in control of the BM.
- Without the permission of BM, no external person shall be allowed to access any member/loan-related documents.

Any exception requires prior approval of the Chief Business Officer & Chief Risk Officer. Any lapse in the above-mentioned process will lead to serious disciplinary action against concerned staff.

Approval Authorities Details & Signature		
Anil Kwatra	**Dhiraj Jha**	**Gaurav Gupta**
Chief Business Officer	Chief Risk Officer	Head- Process & Policy
16/01/25	16/01/25	16/1/25

End***