



India Edtech Consortium (IEC)

MEMORANDUM



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MEMORANDUM

1. OBJECTIVE

The **India Edtech Consortium** ('IEC') members (the signatories to this memorandum) affirm their belief that every learner shall have access to quality and affordable education, which not just improves academic performance but makes an individual future ready. Consortium also aims to catalyse public-private efforts in technology driven approach towards maximizing teaching-learning outcomes. At its core, IEC is committed towards nation building by supporting national efforts to make India 'self-reliant' and the global education hub for 'growth & innovation.'

In this pursuit, the IEC members seek to uphold the highest standards of quality, professional ethics and have a consensus to build on these, the common set of guidelines and the self-regulatory code of conduct, essential to achieve adoption at scale in a sustainable manner for learners, educators and the society while fostering the growth of this industry.

The IEC members have come together to observe and adhere to a common '**Code of Conduct**' and to **establish a two -tier grievance redressal mechanism.**

- i. Tier I – Internal Complaint Forum by IEC Member
- ii. Tier II – Self-regulation by Independent Grievance Review Board

IEC Members under the aegis of Internet & Mobile Association of India ('IAMAI') have come together to set up an autonomous and an independent body of Edtech entities called the '**India Edtech Consortium**' ('IEC'). The IEC shall also set up '**India Edtech Consortium Management Committee**' ('IECMC') through this Memorandum which shall also be responsible for constituting an autonomous and independent Self-Regulatory Body at Tier II called the '**Independent Grievance Review Board**' ('IGRB') for adherence to the functions as laid down in this memorandum.

2. **MISSION**

The present document *inter-alia* lays down roles and responsibilities of all member-signatories to this Memorandum and provides the structure for governance, composition, functions and powers of IEC, IECMC and the IGRB.

3. **HEADQUARTERS**

The headquarters of the IEC shall be located at 232-B, Ground Floor Okhla Industrial Estate, Okhla Phase III, New Delhi, Delhi 110020. All official correspondence shall be addressed to the instant address. It is however clarified that the meetings of the IEC, IECMC and/or the IGRB may be conducted virtually or physically at Delhi or Mumbai or such other place as may be decided by the members of the respective body by way of a simple majority.

4. **MEMBERS – IEC**

4.1 All members of IEC constitute the ‘**IEC Council**’. To qualify for membership, the entity must be:

- a. an entity imparting education whether in pre-k, K-12, higher education, test preparation, language, teacher training, skill development or professional education segment;
- b. providing education over the internet or computer networks, in the territory of India, whether or not incorporated in India

Members shall be represented by their founding members/duly appointed representatives.

4.2 All signatories to this Memorandum are listed at **Schedule-I** hereto. All signatories of this Memorandum shall be eligible to become members of the IEC upon payment of the prescribed fee hereunder. It is clarified that in case of Group Companies, all Companies

forming part of one Group Company shall take membership as independent entities and shall have independent voting rights.

- 4.3 Any future membership to the IEC shall be via membership application and subject to the IECMC's approval by simple majority and receipt of payment of membership fee once application has been approved. It is further clarified that an entity need not necessarily subscribe to membership of IAMAI for such entity to become a member of the IEC.
- 4.4 Upon approval of the membership application, IEC members shall pay a one-time entry fee (**'Entry Fee'**) per member payable at the time of joining as a member. In addition to Entry Fee, all members of IEC shall be required to pay an annual subscription fee (**'Annual Subscription Fee'**) per member, payable annually in advance at the beginning of every year. Additionally, the members shall also have the option to pay the annual subscription fee in half yearly installments. The schedule of fees payable by the IEC members will be slab based as per annual turnover of the company and is as detailed in **Schedule-II**. The Secretariat shall ensure that timely invoices are raised on each member to enable payment. The Entry Fee and/or Annual Subscription Fee may be re-evaluated from time to time by the IECMC based upon the budgetary needs and the number of members in the IEC. Annual Subscription Fee and Entry Fee once paid shall be non-refundable.
- 4.5 After the formation of the IEC, every year a detailed budget shall be introduced by the Secretariat to be approved by IECMC. Any sums not utilized during the previous financial year shall be added to and utilized/adjusted in the budgetary allocations of the following year.
- 4.6 In the event of non-payment of the Annual Subscription Fee, IECMC shall have the right and authority to terminate the membership of such member provided that before exercising such right, IECMC shall give thirty (30) days prior written intimation to the relevant member calling upon it to clear dues and highlighting that failure to clear dues will result in termination. In case of termination, if such member desires to re-apply for the membership to the IEC, the same shall be treated as a fresh application subject to payment

of Entry Fee and Annual Subscription Fee as per clause 4.4. Further, such a member re-applying for membership to the IEC shall also be required to clear all pending dues, if any, until the effective date of cessation of earlier membership.

- 4.7 Each member of the IEC shall have one vote and be eligible to be elected to the IECMC in the manner as is detailed in Clause 6.
- 4.8 All members of the IEC shall be bound by the directions/advisories/orders of IGRB and IECMC as issued from time to time, as well as all applicable laws of the country.
- 4.9 All members of the IEC shall publish a disclosure report quarterly on their website/interface furnishing the details of the grievances received by them. The format of the disclosure report shall be as indicated in **Schedule VII** of this memorandum.

5. DECISIONS AND MEETINGS OF IEC COUNCIL

- 5.1 The IEC Council shall meet at least twice every year in person or through video conference (**‘Bi-Annual General Meeting’**).
- 5.2 The minimum quorum for **‘Bi-Annual General Meetings** shall be 60% (sixty percent) of the total members of the IEC. In the absence of requisite quorum, the meeting shall be rescheduled. The IEC will have the power to decide upon the matters listed in **Schedule - III**.
- 5.3 Any member of the IEC Council may call for an Extra-Ordinary General Meeting. For such purpose, the respective IEC member may file a request (**‘EOGM Request’**) with the Chairperson/Co-Chairperson of the IECMC specifying the purpose of seeking such Extra-Ordinary General Meeting. Chairperson/Co-Chairperson shall forward the EOGM Request to the IEC Council members for approval within twenty-four (24) hours. Such approval/disapproval should be communicated to the Chairperson/Co-Chairperson within the next forty-eight (48) hours. If the EOGM Request is approved by minimum

75%(seventy five percent) of IEC members, the Chairperson/Co-Chairperson shall inform the IEC member accordingly. The date, time, purpose and mode of such approved Extra-Ordinary General Meeting shall be intimated by the Chairperson/Co-Chairperson to all the IEC members in advance.

- 5.4 The minutes of the proceedings of all meetings and resolutions passed shall be prepared and circulated by the Secretariat to the members of the IEC Council within seven (7) working days of the conclusion of every such meeting or passing of the resolution.

6. IEC MANAGMENT COMMITTEE (IECMC)

- 6.1 The IECMC shall be the governing body of IEC and consist of 5 (five) members (**‘MC Member(s)’**). For the initial period of 2 (two) years of the constitution of the IECMC (**‘Initial Years’**), the MC Members shall consist of existing Chairperson and two Co-chairs of the IAMAI Edtech Committee and two other elected members from the IEC Council (as per Clause 6.4 below). Each IECMC shall be represented by their respective authorized representative (**‘Authorized Representative’**).

- 6.2 Upon expiry of the Initial 2 Years, all five (5) MC Members shall be elected from the members of the IEC Council by way of General Elections.

- 6.3 At any time, post expiry of the Initial Years, the IEC shall have the right to amend and/or alter the constitution of the IECMC as provided in Clause 6.1 and 6.2 above and/or the election process of the IECMC as provided in Clause 6.4 below, by way of a 3/4th majority present and voting.

- 6.4 **General Elections:** Members to the IECMC shall be elected from the IEC Council by way of elections (**‘General Elections’**) conducted by the Secretariat in the manner as below:

- a. For the Initial Years, all members of the IEC Council except the 3 members [Chairperson + 2 Co-chairpersons of IAMAI Edtech Committee] will be eligible to

be elected to the IEC Management Committee as Elected Members. All IEC members shall each be entitled to nominate themselves and 2 (two) other members amongst themselves as their nominees to be elected as the Elected Members to the IECMC. The IEC member receiving the highest nomination shall be appointed as the Elected Member(s) to the IECMC.

- b. Upon expiry of the Initial Years, all members of the IEC shall be eligible to be elected to the IECMC.
- 6.5 The Secretariat will be responsible for the conduct of General Elections and shall distribute the nomination forms electronically to all members of IEC. Members shall suitably fill the nomination forms as per the procedure outlined above and submit the same to the Secretariat.
- 6.6 In the event any IECMC Member resigns/quits and/or is terminated because of non-payment of the requisite fee, then the IEC Member with the next highest nominations in the last General Election shall be appointed to the IECMC as a IECMC Member for the remaining tenure of the IECMC.
- 6.7 If the Authorized Representative of any IECMC Member quits the member organization, he/she represents, such IECMC Member shall appoint another representative as his/her replacement for the remainder of the applicable tenure.
- 6.8 The tenure of the all the IECMC Members shall be for a period of 2 (two) years. For clarity, the IECMC Members shall be entitled to be re-elected to the IECMC for consecutive terms.
- 6.9 Every subsequent General Election shall be conducted at least two months prior to the expiry of the tenure of the IECMC. The tenure of such newly elected IECMC shall commence upon the expiry of the tenure of the outgoing IECMC.

7. CHAIRPERSON AND CO-CHAIRPERSON OF IECMC

- 7.1. The Chairperson and the Co-Chairperson of the IECMC shall be elected by and from the members of the IECMC by way of simple majority (**‘Office-Bearer Election’**).
- 7.2. The Office-Bearer Election shall be conducted within ten (10) working days from the date of the General Elections. The representative of the member securing the highest number of votes in the Office-Bearers Election shall be the Chairperson of the IECMC till the next Office-Bearers Election. The representative of the member securing the second maximum number of votes in the Office-Bearers Election shall be the Co-Chairperson of the IECMC till the next Office-Bearers Election.
- 7.3. The term of the Chairperson and Co-Chairperson shall be for a period of 1 (one) year. All succeeding Chairperson and Co- Chairpersons shall take charge upon expiry of the tenure of the existing Office Bearers. The Chairperson and Co-Chairperson would be subject to a cooling off period of 1 (year) year upon the expiry of their tenure. If a Chairperson, for any reason, vacates their position prior to expiry of its tenure, the Co-Chairperson shall take over as the Chairperson for the remaining tenure and a new Co-Chairperson shall be elected by the IECMC for the remaining period. If the position of the Co-Chairperson is vacated at any time for any reason whatsoever, a new Co-Chairperson shall be elected by the IECMC for the remaining period of IECMC. If the positions of Chairperson and Co-Chairperson are vacated at the same time for any reason whatsoever, new Chairperson and Co-Chairperson shall be elected by the IECMC for a period of one (1) year.
- 7.4. The Chairperson and/or the Co-Chairperson shall preside at all meetings of the IEC Council and IECMC. It is clarified that the Chairperson/Co-Chairperson shall not have any veto powers.
- 7.5. The Chairperson and in the absence of Chairperson, the Co-Chairperson, as may be applicable shall be responsible for:

- a. managing the overall operations and resources of IEC.
 - b. acting as the main point of communication between the IECMC and the IGRB, as well as between the IECMC/the IGRB (as applicable) and the IEC Council;
 - c. overseeing operations of Secretariat on behalf of the IECMC; and
 - d. being the public face of the IEC inter-alia before regulators/government bodies/ministries/government agencies.
- 7.6. The Chairperson, Co- Chairperson or any other person designated by them shall be the official spokesperson for IEC. No other IEC member shall make any official statements to the media/press/government officials on behalf of IEC.
- 7.7. The Chairperson and Co-Chairperson shall also exercise such functions and duties as they may be empowered with by the IEC Council.

8. DECISIONS AND MEETINGS OF IECMC

- 8.1 The IECMC shall meet at least 4 (four) times every year in person or through video conference (**‘Quarterly General Meeting’**) and if required, shall meet more frequently as may be decided by the Chairperson and/or in his absence, the Co-Chairperson of the IECMC
- 8.2 The minimum quorum for any the IECMC shall be 3 (three) members. In the absence of requisite quorum, the meeting shall be rescheduled. In case any Authorized Representative of a MC Member is unable to attend any meeting of the IECMC, such MC Member may nominate any other person to attend the meeting as the acting Authorized Representative of the concerned MC Member. Such acting Authorized Representative shall have all rights, powers and obligations as that of the Authorized Representative of the concerned MC Member for the purposes of the meeting attended and the respective MC Member shall be bound by all acts and conducts of the same. The IECMC will have the power to decide upon the matters listed in **Schedule -IV** and all decisions taken by the IECMC shall be by way of simple majority.

- 8.3 The Chairperson of the IECMC may call for an Extra-ordinary General Meeting of the IECMC and/or the IEC Council. The date, time, purpose and mode of such Extra-Ordinary General Meeting shall be informed in advance.
- 8.4 The minutes of the proceedings of all meetings and resolution(s) passed shall be prepared and circulated by the Secretariat within 7 (seven) working days of the conclusion of every such meeting or passing of the resolution with the IECMC to all members of the IEC.
- 8.5 The IECMC shall make necessary amendments to **Schedule-I** to reflect the true and accurate representation of the signatories to this Memorandum.

9. ANNUAL BUDGET AND OUTLAYS

The IEC shall have and maintain a separate independently audited book of accounts (**‘IEC Account’**) and all income and expenses shall be duly accounted for. Members of the IEC shall have access to the audited report/audited statements of the IEC Account. All expenditure of the IEC including any/all expenses in connection with the functioning of the IGRB/Secretariat shall be paid through the IEC Account. The Secretariat shall manage all the expenses and outlays in accordance with the budgetary allocation as decided by the IECMC. In the event, the expenses and outlays exceed budgetary allocations or are anticipated to exceed the same, the IECMC may call for an Extra-ordinary General Meeting of the IEC Council to decide upon such matters and may call for ad-hoc fees from the members.

10. GRIEVANCE REDRESSAL MECHANISM

Any aggrieved consumer may file a complaint with Tier 1 and may escalate it to Tier II- for having not been resolved by the member of the IEC within 30 days of receipt of such complaint. Additionally, any consumer may file an appeal before the Tier II against decisions of the member of the IEC (Tier I) within 30 days of receipt of such decision.

If any consumer has approached the Government / third party with a complaint, the Government / third Party may also forward such complaint to either Tier I or Tier II for redressal. The Government / third party itself may also file a complaint with either Tier I or Tier II.

The two-tier Complaint Redressal mechanism would examine complaints about any violation of the Code of Conduct, received from its consumers, government or any third party.

TIER I – APPOINTMENT OF GRIEVANCE OFFICER & REDRESSAL PROCEDURE

- 10.1 Each IEC members shall ensure that it sets up an Internal Grievance Redressal Mechanism and its details should be disclosed on its website/interface of the IEC member along with all sales-marketing and promotional information.
- 10.2 To establish Internal Grievance Redressal Mechanism, each IEC member should appoint a Grievance Officer (GO) for receiving grievances related to Code of Conduct and interaction with Complainant, IGRB and the Ministry of Education. The Grievance officer would lead the **Internal Complaint Forum ('ICF')**, which would serve as Tier I of the grievance redressal mechanism. The GO would also be the single point of contact for IEC Council for any grievance related matter.
- 10.3 Each IEC Member shall provide the contact details with name, designation, phone number and email address of the GO on its website and/or on its online platform.
- 10.4 Each IEC member shall also appoint a Compliance Officer (CO) who would oversee adherence by the Member to the Code of Conduct and the IEC memorandum and to any other applicable laws.

- 10.5 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.
- 10.6 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.
- 10.7 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.

11. PROCEDURE FOR FILING APPEAL/ESCALATED GRIEVANCE WITH IGRB

11.1 Format for Filing Appeal/Escalated Grievance:

All Appeal(s)/Escalated Grievance(s) filed by Appellant/ Complainant/ to the IGRB may be filed in the specified format annexed as **Schedule VI**. At any time, the Complainant/ Appellant may withdraw their Appeal by sending an email to [Email ID].

11.2 Verification of Appeal/ Escalated Grievance by the Secretariat:

- a. All Appeal(s) /Escalated Grievance(s) shall be required to be verified to be valid by the Secretariat within 7 (seven) working days of receipt of such appeal/escalated grievance. Within 3 (three) working days of the receipt of the Appeal/Escalated Grievance, the Secretariat shall forward the copy of the Appeal/Escalated Grievance to the concerned IEC member named in the

Appeal/Escalated Grievance, as the case may be. The Secretariat may call upon such IEC member to share any details that may be required for verification of the Appeal/ Escalated Grievance and the IEC member may revert on the details sought by the Secretariat within a period of 3 (three) working days upon receipt of such Appeal/Escalated Grievance. The Secretariat shall thereafter verify the completeness and validity of the Appeal/Escalated Grievance after consideration of the details shared by the relevant IEC member, if any

- b. If the Appeal/Escalated Grievance is bereft of any essential particulars which is necessary for the adjudication thereof, the Secretariat may call upon the Complainant/Appellant to provide such information as may be required. It is clarified that until the Complainant/Appellant provides all the requisite information sought by the Secretariat and the concerned Appeal/Escalated Grievance is accordingly verified by the Secretariat, such Appeal/Escalated Grievance shall not be considered as a valid Grievance/Appeal to be adjudicated by the IGRB hereunder.

11.3 **Registration of Grievance by the Secretariat**

Once an Appeal and/or Escalated Complaint is successfully verified and considered to be valid, the same shall be registered as a registered grievance (**‘Registered Grievance’**) and a registration number shall be assigned to the same. The Secretariat shall issue an email on the same day intimating the concerned Complainant and IEC member of the registration number of such Registered Grievance.

12. **SCREENING COMMITTEE FOR TIER II GRIEVANCES**

- 12.1 A Screening committee (**“Screening Committee”**) of 5 (five) members comprising of three members from IEC Council and two from the Secretariat will be constituted to conduct a review of the grievances filed with Tier II. The 3 (three) members from the IEC Council shall be selected by a simple majority and shall serve on the Committee for a period of 6 months. In the event a complaint pertains to the Screening Committee

Member's particular member company, such Member shall not be permitted to participate in screening of the grievance and a backup member selected from the IEC council will form part of the Screening Committee.

12.2 The Screening Committee shall 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 Code violation and may do the following:

- a. In case of an appeal, if the Screening Committee after assessment of the decision given by the IEC member is of the preliminary opinion that the Code of Conduct may have been violated, the Committee shall, within 5 days of the registration of the complaint, forward the same to the IGRB for Tier 2 redressal as detailed in this memorandum.
- b. If the Screening Committee after the assessment of the appeal forms the opinion that the allegation of Code of Conduct violation lacks merit, the Committee shall send a written reasoned response, within 5 days of registration of the complaint to the complainant citing the reasons due to which the complaint is devoid of merit and recommending that the appeal be closed. If, however, the Complainant wishes to further pursue their grievance with the IGRB, they would need to respond accordingly within 5 days of receiving the response.
- c. In case of Escalated Grievance, the Screening Committee may, within 5 days of the registration of the complaint, forward the same to the concerned IEC member and ask them to redress it within 7 days, in the absence of which, the same shall be forwarded to the IGRB for Tier 2 redressal as detailed in this memorandum.

12.3 The Screening Committee's function would be to screen the grievances to ensure faster and effective grievance redressal. The Screening Committee shall meet either virtually or physically.

- 12.4 The Screening Committee members shall not be permitted to also serve as a member on the IGRB while they are discharging their functions as a member of the Screening Committee.

13. TIER II - CONSTITUTION OF IGRB

- 13.1 The IGRB shall be a 7 (seven) member body comprising of a Chairperson, being a retired Judge of the Supreme Court/High Court and 6 (six) other members. The Chairperson and 4 Expert Members of the IGRB (who shall meet the qualification as set out in 13.2 below shall be appointed by IECMC by way of simple majority. All appointments to the IGRB shall be initiated by the IECMC at least 60 (sixty) days prior to the expiry of the term of the respective IGRB member(s).
- 13.2 The composition of expert members of the IGRB shall be as under:
- a. Four (4) members from the industry with a deep understanding of the sector and, not employed with any members of the IEC ('**Expert Members**'). Out of these four members, one member could be a retired government official (Retired IAS , JS and above), with reputed integrity, one person from Academia (Ex VC / Dean of IIM / IIT / Central Univ (administrator) and two representatives from consumer business.
 - b. Two (2) representatives from the IECMC shall be selected on a rotational basis from the IECMC for a tenure of 6 (six) months each. The IECMC, through a draw of lots, will decide the rotational sequence for the 2 (two) members on IGRB. It is clarified that lots shall be drawn at the beginning of the tenure of the respective IGRB to determine which two IECMC members serve on the IGRB, and which one member shall serve as an alternate member to the IGRB, ('**Alternate Member**'). In the event a complaint pertains to the IECMC member then serving on the IGRB, the alternate Member shall be brought in to serve on the IGRB as a member for the redressal of the complaint. No IECMC member shall serve on the IGRB for two subsequent terms.

- 13.3 The Chairperson and 4 (four) Expert members shall hold office for a period of 2 (two) years. After the end of the tenure, the IGRB members including the Chairperson shall however continue to hold office until the IGRB is reconstituted.
- 13.4 If a person nominated as a member to the IGRB is found unfit to hold the IECMC may remove such person and thereupon such person shall forthwith cease to hold any position on the IGRB. It is clarified that a member may be deemed to be “unfit” on the grounds of convicted for an offence, involving moral turpitude, professional misconduct, neglect of duty towards IGRB, continued absence from IGRB meetings and/or medical incapacity.
- 13.5 The Chairperson may resign their office by giving an advance notice of 1 (one) month in writing to the IECMC. Any other member(s) may also resign their office by giving an advance notice of 1 (one) month in writing to the Chairperson, and upon such resignation being accepted by the IECMC or by the Chairperson as the case may be, the Chairperson or the Member shall be deemed to have vacated their office.

14. TERMS OF SERVICE OF MEMBERS OF IGRB

- 14.1 The Chairperson and the 4 Expert members of IGRB shall receive such honorarium and/or allowances and/or fees/remuneration for performing their functions and duties as decided by the IECMC.
- 14.2 The Chairperson and Expert members of IGRB will be entitled for reimbursement of traveling, boarding and lodging expenses, if they are travelling from another city to attend the meetings and or perform their functions and duties.

15. **JURISDICTION OF IGRB**

15.1 The IGRB shall entertain the following grievances:

- a. Complaints escalated to the IGRB for having not been resolved by the members of the IEC members within thirty (30) days of receipt of such complaint (**‘Escalated Complaint(s)’**).
- b. Appeals filed before the IGRB against decisions of the members of the IEC (**‘Appeal(s)’**).

The Escalated Complaint(s) and Appeal(s) shall hereinafter be collectively referred to as ‘Grievance(s)’.

15.2 The IGRB’s jurisdiction to hear Appeals shall be limited to issues regarding Ethical Sales Practices, Transparent Marketing Communication, Robust Financing / Loans / Refunds which have been detailed in the Code of Conduct and annexed as **Schedule V**.

15.3 The IGRB shall generally:

- a. Oversee and ensure the alignment and adherence by the IEC members to the Code of Conduct, and
- b. Provide guidance/advisories to IECMC/IEC on various aspects of the Code of Conduct.
- c. Order expulsion of a member from the IEC for repeated non-compliance with the Code of Conduct.

16. TIMELINE FOR FILING APPEAL WITH THE IGRB

- 16.1 The Appeal shall be filed in the prescribed format and shall be verified as per the procedure detailed in Clause 11 above.
- 16.2 The IGRB shall only entertain Appeal(s) filed within 30 days from receipt of Tier 1 decision and the Secretariat, may at the time of verification of the Appeal, reject the same as invalid for being in violation(s) of timelines.

17. TIMELINE FOR FILING ESCALATED GRIEVANCE WITH THE IGRB

- 17.1 The Escalated Grievance shall be filed in the prescribed format and shall be verified as per the procedure detailed in Clause 11 above.
- 17.2 The IGRB shall only entertain Escalated Grievance (s) filed within 30 days from filing the grievance at Tier 1 and the Secretariat, may at the time of verification of the Escalated Grievance, reject the same as invalid for being in violation(s) of timelines.

18. PROCESSING GRIEVANCE BEFORE IGRB

- 18.1 Once an Appeal and/or Escalated Complaint is forwarded by the Screening Committee to the IGRB, after concluding the screening process detailed in Clause 12 above, the Secretariat shall issue an email on the same day intimating the concerned Complainant and IEC member of the date of the sitting/hearing of the IGRB for adjudication of the Registered Grievance and may provide, if it deems necessary, both parties an opportunity to appear/represent themselves on the said date before the IGRB.
- 18.2 The IGRB shall conduct a preliminary assessment, making such review as are necessary to reach an informed decision as to the alleged Code violation. If the IGRB determines, after the assessment, that there is no need for further action or that the Code violation

allegation lacks merit, the review and administrative action shall terminate and the complaining party shall be notified.

- 18.3 If the Registered Grievance is an Appeal, upon receipt of the registered number of the same, the concerned IEC Member may choose to file a written submission/reply to the grievance within the next 4 (four) working days with the Secretariat.
- 18.4 If the Registered Grievance is an Escalated Complaint, upon receipt of the registered number of the same, the concerned Complainant and/or IEC Member may choose to file a written submission/reply to the grievance within the next 4 (four) working days with the Secretariat.
- 18.5 The Secretariat shall ensure that any written submission/reply filed by the Complainant and/or the IEC Council member is put forth along with the Registered Grievance before the IGRB for its consideration.

19. GRIEVANCE REDRESSAL BY IGRB

- 19.1 The Registered Grievance(s), along with the written submission/reply from the concerned member/Complainant shall be deliberated upon by the IGRB at its first sitting/hearing, post expiry of the aforesaid 4 (four) working days granted to the IEC member/Complainant for filing its written submission/reply, if any.
- 19.2 Upon conducting the first sitting/hearing, the IGRB may dispose the Registered Grievance by passing such guidance/advisory/order as it deems fit and communicate the same to the Complainant/Appellant and the concerned IEC member through the Secretariat not later than 30 working days from the working day following the date of the registration of the Registered Grievance. The maximum penalty for the errant member in the event of inability of adhering to the code of conduct would be expulsion from the IEC Council.
- 19.3 If in its first sitting/hearings, the IGRB is of the opinion that it requires a second hearing for adjudication of such Registered Grievance, the IGRB may through the Secretariat fix

the second sitting/ hearing as soon as convenient and not later than 7 (seven) working days from the date of first sitting/hearing.

- 19.4 If in its first sitting/hearing, the IGRB is of the opinion that any further clarification/information is required from the Complainant/Appellant and/or the IEC member, the IGRB may through the Secretariat direct the concerned party to furnish the information/reply sought by the IGRB within 3 (three) working days from the date of first hearing and fix the second sitting/ hearing as soon as convenient and not later than 7 (seven) working days from the date of first sitting/hearing. However, if upon receipt of the information sought, IGRB is of the opinion that no second sitting/hearing is required, IGRB may proceed to dispose of the Registered Grievance in terms of Clause 19.2 above.
- 19.5 Should IGRB proceed to conduct a second hearing under Clause 19.3 and/or Clause 19.4, the IGRB shall ensure that it shall dispose the Registered Grievance by passing such guidance/advisory/order as it deems fit and communicate the same to the Complainant/Appellant and the concerned IEC member through the Secretariat not later than 30 (thirty) working days from the working day following the date of the registration of the Registered Grievance.
- 19.6 If the Complainant/Appellant/concerned IEC member fails to appear before the IGRB, the Registered Grievance shall be adjudicated on the basis of the information available with the IGRB on merits. If the Complainant/ Appellant withdraws the Registered Grievance, the IGRB shall dispose of such Registered Grievance as withdrawn.
- 19.7 The minimum quorum for every such sitting shall be 3 (three) members, including the Chairperson (**‘IGRB Quorum’**). In case of a tie, the Chairperson shall have the casting vote.
- 19.8 All decisions of the IGRB shall be by way of a simple majority of the IGRB Quorum present in the sitting/hearing. The Chairperson shall have the right to additional vote in case of deadlock.

- 19.9 The Complainant/Appellant and the relevant IEC member shall have an option of being represented through a legal representative at the sitting/hearing of their Registered Grievance.
- 19.10 The IGRB shall hold its sittings/hearings on the Tuesday and Friday of the week subject to Clause 19.2 above. Such hearings/sittings shall be held either virtually or physically as per the sole discretion of IGRB.
- 19.11 In case there are multiple Registered Grievances relating to the same issue, the IGRB may, at any stage, club them together for hearing and adjudication.
- 19.12 The Complainant/Appellant and the IEC Member in any Registered Grievance shall be provided the option to attend the sittings/hearing in such Registered Grievance through a virtual mode along with their legal representatives, if any.
- 19.13 The guidance/advisory/decision of the IGRB in a Registered Grievance shall be communicated in writing to the concerned Appellant/Complainant and the IEC member. All Registered Grievances decided by the IGRB, excluding the withdrawn Grievances, shall be published by the IGRB through the Secretariat, on the official website of IEC

20. DECISION OF IGRB

- 20.1 The IGRB after following the due process of Grievance Redressal Mechanism as set out hereinabove shall pass reasoned guidance/advisory/order within 30 (thirty) working days of registration of the Registered Grievance.
- 20.2 Upon compliance of the due process of Grievance Redressal Mechanism as set out hereinabove, if the IGRB comes to the conclusion that the IEC member against whom the Registered Grievance is filed, has violated the Code of Conduct, the IGRB may, at its discretion, direct the said member to remedy an alleged Code violation through informal, oral and written communication with the concerned member.

- 20.3 If the IGRB determines that there are violations of such a nature, scope or frequency that in the best interests of learners & educators, the IEC Council, and/or the Edtech industry require remedial action, the member shall be notified of the reasoning and facts that resulted in the decision as well as the nature of the remedy.
- 20.4 If the remedy is not implemented in 30 days or the concerned member refuses to reply or adhere to the remedy or this is the 4th open complaint, the IGRB shall send the expulsion communication to the member and inform the IEC Management Committee of the same.
- 20.5 The concerned member would need to appeal against the expulsion to the IGRB within 15 days of the expulsion communication with a detailed explanation of why it should be a part of the IEC Council.
- 20.6 In case there is an appeal, IGRB would set up an **Appeals Review Panel ('ARP')** consisting of three representatives from IEC who shall be selected by the IECMC within 20 calendar days. The three member companies shall be selected in a manner that represents a cross-section of the industry. Where possible, none of the three companies shall sell a product that specifically competes with the member that is seeking the ARP (hereinafter "the Appellant"), and every effort shall be made to avoid conflicts in selecting the ARP.
- 20.7 ARP shall have 30 days to evaluate the explanation given by Appellant and accept or reject the appeal. In case the appeal is accepted, the member would need to close all the open complaints within 15 days after the acceptance of appeal, to continue to be a member of IEC.

21. SECRETARIAT AND ITS DUTIES

- 21.1 The Secretariat shall be constituted by IEC Management Committee and IAMAI, and members/staff of the Secretariat shall be proposed by IAMAI subject to approval by the IEC Management Committee.

21.2 The Secretariat shall be an administrative body that shall handle day to day activities of the IGRB, including but not limited to:

- a. managing and maintaining the official portal/e-mail ID established for receiving Grievances;
- b. issuing notices/communications as directed by the IGRB;
- c. organization and management of Grievances in the manner as preferred by the IGRB;
- d. take necessary actions towards ensuring Grievances are compliant of the requisite format and procedures detailed herein
- e. making synopsis of the Grievances in the manner prescribed by the IGRB;
- f. maintaining records of Grievances received and/or orders passed by the IGRB;
- g. classification of Grievances for the IGRB's optimum operational convenience;
- h. organizing sittings and hearings of the IGRB;
- i. maintaining records and performing such other activities as mandated/directed by the IGRB;
- j. publishing IGRB guidance or advisory

21.3 The Secretariat shall also record the minutes of IEC meeting/ IEC Management Committee/Screening Committee meetings and perform such other functions (including administrative functions) as contemplated herein and deemed necessary by the IEC Management Committee.

21.4 The Secretariat shall carry on the duties/functions allocated to it by the IGRB and shall report to the IEC Management Committee for all other matters (including the duties/functions allocated to it by the IEC Management Committee).

22. MISCELLANEOUS

22.1 Members of the IEC Council, the IEC Management Committee (including Chairperson/ Co-Chairperson of Management Committee and committees/sub-committees constituted

by the Management Committee), the IGRB (including the Chairperson and the IGRB members) and the Secretariat shall not be personally liable for any action taken by them in good faith.

- 22.2 The IGRB and the Secretariat shall be functional from Monday to Friday during working hours (10:00 AM- 5 PM) only. Any grievance filed after working hours or on a Saturday or Sunday or a National/State/declared holiday shall be treated to have been filed on the next working day. If the timeline for filing any grievance expires on a holiday, such grievance can be filed on the following working day.

-----End of Document-----

SCHEDULE-I

NAMES OF ALL SIGNATORIES TO THE MEMORANDUM

- 1. GREAT LAKES E-LEARNING PRIVATE LIMITED**
- 2. BUNCH MICROTECHNOLOGIES PRIVATE LIMITED**
- 3. CLASS 21 TECHNOLOGIES PRIVATE LIMITED**
- 4. CUELEARN PRIVATE LIMITED**
- 5. EPOWERX LEARNING TECHNOLOGIES PRIVATE LIMITED**
- 6. RANGURU TECHNOLOGY SOLUTIONS PRIVATE LIMITED**
- 7. UNEXT LEARNING PRIVATE LIMITED**
- 8. HARAPPA LEARNING PRIVATE LIMITED**
- 9. INTERVIEWBIT TECHNOLOGIES PRIVATE LIMITED**
- 10. PATHFINDER PUBLISHING PRIVATE LIMITED**
- 11. SIMPLILEARN SOLUTIONS PRIVATE LIMITED**
- 12. SORTING HAT TECHNOLOGIES PRIVATE LIMITED**
- 13. TIMES EDUTECH AND EVENTS LIMITED**
- 14. THINK AND LEARN PRIVATE LIMITED**
- 15. TOPPR TECHNOLOGIES PRIVATE LIMITED**
- 16. UPGRAD EDUCATION PRIVATE LIMITED**
- 17. VEDANTU INNOVATIONS PRIVATE LIMITED**
- 18. WHITEHAT EDUCATION TECHNOLOGY PRIVATE LIMITED**
- 19. LEARNTURE VENTURES PRIVATE LIMITED**
- 20. AADARSH TECHNOSOFT PRIVATE LIMITED**
- 21. JARO INSTITUTE OF TECHNOLOGY MANAGEMENT AND RESEARCH LIMITED**
- 22. SUNSTONE EDUCATION TECHNOLOGY PRIVATE LIMITED**
- 23. LEADERSHIP BOULEVARD PRIVATE LIMITED**
- 24. THREESIXTYONE DEGREE MINDS CONSULTING PRIVATE LIMITED**

SCHEDULE - III

DECISION MAKING POWERS OF IEC COUNCIL

The IEC Council shall decide upon the following matters by way of 3/4th majority of the Quorum present and voting:

1. Constitution of the IECMC and the Election Process
2. Amendment to the IEC Memorandum
3. Delegate powers to the IECMC

SCHEDULE - IV

DECISION MAKING POWERS OF IEC MANAGEMENT COMMITTEE

The IECMC shall decide upon the following matters by way of simple majority of the Quorum present and voting:

1. Appointment and Termination of the Chairperson and other Members of the IGRB.
2. Approval of membership to the IEC Council
3. Termination of membership of the IEC member on account of non-payment of Annual Subscription Fees in terms of stipulations contained in the Memorandum.
4. Fix and/or modify the Entry Fee and Annual Subscription Fee payable by the IEC Council members.
5. Annual and ad-hoc budget.
6. Approving the members of the Secretariat.
7. Fixing of honorarium and/or allowances and/or remuneration payable to the members of the IGRB, Secretariat and such other staff.
8. Constitute such number of committees/sub-committees and for such purposes as may be deemed necessary.
9. To make necessary amendments to **Schedule-I** to reflect the true and accurate representation of the signatories to this Memorandum.
10. Decide upon any other matters handed over to it by the IEC Council

SCHEDULE – V

CODE OF CONDUCT - IEC

Three Areas of Focus for the Code of Conduct are covered below:

1. Appropriate/Ethical Sales Practices

The Principles

- *What is told is what is sold*
- *No mis-selling of products/services/programs should be done by the organizations*
- *No unvalidated claims should be made during the selling 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. Mis-selling should be defined clearly in the Sales SOPs
- ii. Internal SOP to deal with mis-selling should be maintained.
- iii. The action against the responsible person should be clearly explained in internal SOPs and the mis-sells should be mapped against the concerned sales teams/individual admission counsellors.
- iv. There should be specific and regular training on the same for the sales teams.
- v. QA and QC Cells should be established defining SOPs and monitoring the communication that is being made during the selling process
- vi. The product/service/program specifics and pre-requisites should be mentioned in communications to the learner, wherever appropriate.
- vii. There should be provision for disincentives and penalties for mis-selling and other unfavourable behaviour or information given to the prospect during the selling process.
- viii. Every advertisement of successful candidates must substantiate the product or service they used to give credibility to the claim of success.

- ix. Learner queries, complaints and escalations for each product/service/program should be recorded with a specific filter for mis-selling and type of mis-selling.

2. 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 the competitor targeting in the 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 Company 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

3. 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 companies-

- i. Develop rules and standards for payments processing – refunds, trial periods, money back guarantee etc
- ii. Policies should be displayed regarding the refund and cancellation prominently on the user interface platform in a manner that cannot be missed
- iii. Loans and other financing FAQs should be clearly mentioned on the platform in a manner that cannot be missed
- iv. Multiple communication channels should be used to make the learner/parent aware of the policies
- v. The standard issues and Frequently Asked Questions (FAQs) of financing should be clearly communicated with examples to the learner/parent
- vi. All the documents related to financing should be signed by the learner/parent and the records should be kept.

SCHEDULE VI

FORMAT OF THE COMPLAINT/GRIEVANCE

DETAILS OF COMPLAINANT/APPELLANT	
Full Name*	
E-mail ID*	
Phone Number	
DETAILS OF IEC COUNCIL MEMBER	
Name of the IEC Council Member*	
Date of filing of Complaint with IEC Council Member*	
Details of acknowledgement receipt issued by IEC Council Member (if any)	
Name and email ID of the Grievance Officer of the IEC Council Member	
DETAILS OF COMPLAINT	
Indicate the Code of Conduct which has been violated by IEC Council Member	
Other Details	
DETAILS TO BE PROVIDED IN CASE THE GRIEVANCE IS BEING FILED AS AN ESCALATED COMPLAINT TO THE IGRB	
Short summary of the Complaint in less than 1000 words*	
Annexure A to be attached*	Copy of the original Complaint (along with enclosures, if any) addressed to the IEC Council Member

Annexure-B to be attached	Copy of Reply/ Response to the initial Complaint, if any by the IEC Council Member
DETAILS TO BE PROVIDED IN CASE THE GRIEVANCE IS BEING FILED AS AN APPEAL FROM THE DECISION OF THE IEC COUNCIL MEMBER	
Reasons for filing the Appeal in less than 1000 words*	
Annexure A to be attached*	Copy of the grievance (along with enclosures, if any) written to the IEC Council Member at Tier-1 level
Annexure B to be attached*	Copy of decision of the IEC Council Member
Annexure C to be attached	All correspondences and replies relating to the grievance in periodic manner (ascending order date wise), if any
* Mandatory Fields. Please note that in the absence of complete details being provided in the mandatory fields, as applicable, the IGRB will not be able to entertain your Grievance.	

DECLARATION TO BE GIVEN BY THE COMPLAINANT/ APPELLANT

The information and material contained in the grievance are true and correct to the best of my knowledge and belief.

I have placed all relevant information and material before the IGRB and have not concealed any material facts;

I shall inform the IGRB forthwith if during the pendency of the matter before the IGRB, the matter raised in the grievance becomes the subject-matter of any legal proceedings including those before any Court of law, Tribunal or Statutory Authority.

Name of Complainant/Appellant.

SCHEDULE VII

QUARTERLY DISCLOSURE OF GRIEVANCES (APPEAL/ESCALATED GRIEVANCE) DETAILS BY IEC MEMBER

S. No.	Grievances and actions taken	Number
1	Grievances pending at the beginning of the quarter	
2	Grievances received during the quarter	
3	Grievances disposed out of (1) above	
4	Grievances disposed out of (2) above	
5	Grievances pending at the end of the quarter (1+2-3-4)	
6	Action taken	
	(i) Agreed to by the IEC Member and action taken	
	(ii) Not agreed to by the IEC Member	
	(iii) Any other action taken	
7	Orders, directions and advisories received from Central Government and IGRB	
7(a)	Number of Orders, directions and advisories received	
7(b)	Orders, directions and advisories complied to	

AFFIRMATION OF SUPPORT BY THE MEMBERS

We, the Signatories to the present Memorandum as detailed in the Schedule-I hereinabove and as undersigned, hereby agree and affirm to abide by this Memorandum.

This Memorandum is meant to enable compliance of the Code of Conduct by the IEC members and as a signatory to this Memorandum, we affirm the responsibilities and commitments outlined hereunder, which are voluntarily assumed and undertaken. We the undersigned shall discharge our responsibilities and commitments hereunder with complete honesty and fairness, in order to uphold the objectives of this Memorandum.

1. For and on behalf of _____

Name: _____

Designation: _____

Signature: _____