Cerise + SPTF

STANDARDS FOR RESPONSIBLE DIGITAL FINANCIAL SERVICES: COMPLAINTS MECHANISM STANDARDS SECTION

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20 May 2022

CERISE + SPTF
Draft Standards: Complaints Mechanism
(as of 20 May 2022)

<mark>Standards for Complaints Mechanism</mark>
1. Take responsibility to resolve a customer complaint even when it relates to an issue that the partner organization must correct.
2. At the outset of a partnership, establish who will be your point of contact within the partner organization, to help you resolve complaints by your own customers, but that are related to services provided by the partner.
3. Encourage your customers to come to you with complaints about partners.
4. Train customer service employees on how your partner's complaints mechanism works.
5. Train customer service employees on how to respond to customers who voice complaints related to services offered by a partner.
6. Train agents on how to respond to complaints.
7. Train/encourage agents to use your complaints mechanism.
8. Equip the complaints mechanism to register complaints by agents.
9. Analyze complaints data for the following information:
    i. to see if certain segments of customers are underrepresented among the customers who complain
    ii. to see if certain issues are underrepresented among the types of complaints
10. Research why some customers do not file complaints even when they have reason to complain, and address obstacles that prevent customers from complaining.
11. Proactively survey a sample of customers to ask if they have complaints.
12. Monitor social media to see if customers are complaining about your services, and respond as needed.
13. Do weekly trend analysis on the types of complaints you receive.

<mark>Guidance on complaints: concepts, examples of real practice, and questions to address</mark>
Concepts
- A guiding principle is that it is the FSP's responsibility to help its customers get resolution for their complaints, even when the source of the problem is something over which the FSP has no control. Customers cannot be expected to know which partnerships an FSP has established, much less who is in charge of what.
- When training customer service employees on how to respond to complaints about something a partner controls, the response cannot be passive, such as "call X phone number to reach Partner Org's complaints service," but must be active in helping the customer achieve resolution. Tip: Write a script for call center or customer service staff employees for the top 3-5 most common issues, with advice on how best to handle it.
- Agents are going to receive complaints even if that is not one of the official complaint channels. Some customers prefer to complain to agents.
- Be aware that not everyone who has a complaint files one.

- If the clients are complaining about the technology and it goes to the technology provider, then there's an incentive not to report those complaints.
- As there are more and more digital platforms, the notion of owning the customer will shift to who owns the customer experience.
- IPA found that some customers did not report agents charging fees. This is why they recommend to check complaints data to see if issues like fees are underrepresented.

Examples of real practice
- Qualitative consumer research in Bangladesh, Colombia and Uganda, revealed on average, only 11% of customers who experienced difficulties with mobile money reported them via formal complaints channels. (McKee et al. 2015); ii) In Tanzania and Kenya, only 5% and 10% respectively, of digital borrowers ever contacted customer care with a question, concern, or complaint about a digital loan (Kaffenberger et al. 2018).
- In India, in 2019-20, 72% of all complaints…were from metropolitan and urban areas, while rural and peri-urban areas accounted for 10% and 18%, respectively.
- IPA found underrepresentation of female customers in complaints data. IPA posits that social norms limit some women's ability to complain about DFS issues.

Questions to address
- Several people mentioned a practice that is already included in the Universal Standards manual: Offer multiple channels through which customers may register a complaint, including at least one that allows the customer to reach a live person at no cost. How do we marry the complaints mechanism practices already in the manual with the additional complaints practices suggested via DFS-specific discussions?