



# **Designing a User-centric Grievance Redress Mechanism (GRM): A Sector-agnostic Checklist**

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## EXECUTIVE SUMMARY

The importance of user-centric grievance redress mechanisms (GRMs) in creating user-forward products or services cannot be overstated. A well-designed GRM allows users to voice their complaints and seek redress when their expectations are not met with or when they experience harm. It instils confidence in users and demonstrates the provider's commitment to addressing their issues effectively. Moreover, GRMs can serve as user support systems, helping users navigate services and improve their overall experience. Additionally, analysing grievances received through GRMs can provide valuable insights to providers, enabling them to improve their services and better meet users' needs. This research presents a framework comprising nine principles, which we believe are pre-requisites for creating user-centric GRMs. In addition to the 9 principles, the framework contemplates design features bring the principle to life. Consequently, the framework is a combination of 9 principles and a checklist of 61 design features that together guide the creation of user-centric GRMs. This checklist aims to assist public and private providers, and other organisations to create user-centric GRMs or evaluate the user-centricity of their existing grievance redress channels. The questions in the checklist lend themselves to binary responses. However, the objective of this checklist is to not elicit quantifiable scores, but a rich description of the CGRM to contemplate the interventions that may be required and appropriate for a given provider's context. While using the checklist, positive responses to the design features indicate user-centricity, while negative responses to the same indicate user-centricity gaps. However, the authors still recommend that evaluation framework be considered as qualitative given that some design features warrant qualitative responses, and that the risk of overlooking the rationale behind some design choices may persist.

The nine principles that constitute the framework for designing user-centric GRMs include **accessibility, seamlessness, proactive communication, cost-effectiveness and timeliness, personal data protection, objectivity, independence in the operations of the GRM, accountability of the GRM and capacity building.**

The principle of *accessibility* emphasises the importance of ensuring that users can easily approach the GRM. Select design features that support this principle include raising awareness about the existence of grievance channels, providing comprehensible information about the complaint registration process through multimedia channels, and adapting communication methods to ensure this information reaches the most marginalised users.

The principle of *seamlessness* focuses on designing a frictionless process for registering complaints. This principle emphasises that the complaint registration be as easy for the user as possible. Therefore, it discourages the user having to expend effort in recognising the party against which complaint needs to be lodged. This can be a complex assessment for the user, given the multi-party nature of digital transactions. One method to operationalise this principle is to create a unified, one-stop front-end for the customer to lodge complaint against any party. The assessment to determine the appropriate counterpart for seeking recourse can be left to technology, instead of the user. Thus, suite of features such as a unified channel for grievance registration complemented by a technology-driven back-end mechanism for routing complaints to relevant entities, automation of processes and complaint escalation can help give effect to this feature.

*Proactive communication* as a principle emphasises the importance of proactively updating users along their redress journey and providing clarity on the redress process. Design features such as providing immediate acknowledgements with unique reference numbers, informing users of expected processing times and response mediums, and offering ongoing updates on the progress of complaints through users' preferred channels of communications aid this principle.

The principle of *cost-effectiveness and timeliness* highlights the importance of designing GRMs that are quick, easily navigable, and efficient, reducing both time and money costs for users seeking redress. Some design features that help realise this objective include making the GRM free to use, not imposing thresholds regarding the amount in dispute, and any limitation period for filing the

complaint. It also explores the use of interactive and deeply embedded instant messaging services or social media for filing complaints, particularly for smartphone users. Utilising such services can significantly reduce the time and cost involved in accessing a GRM for the users.

The principle of **personal data protection** emphasises the need to institute standards and practices that preserve the confidentiality of the personal information submitted by the users. This principle can be upheld by adhering to data protection principles, communicating data protection practices to users through a privacy policy, and maintaining a robust data security infrastructure.

The principle of **objectivity** highlights the significance of extending similar treatment to similar complaints, consistently over time. It emphasises the importance of establishing and following redress protocols for different complaint categories and preventing bias or inconsistencies in complaint resolution. Clear, consistent, and pre-defined protocols for complaint resolution enhance users' satisfaction and trust in the complaint redressal process.

The principle of **independence in the operation of the GRM** advocates for functional independence from other internal departments or external offices of other organisations. It stresses the need to ensure that the GRM remains free from undue pressure or incentives that may compromise its independence or objectivity. Design features such as isolating GRM personnel from conflicting positions within the organisation are recommended to ensure independence.

**Accountability** as a principle focuses on the GRM making itself answerable for its performance and devising best practices to improve it further. Typically, it involves implementing protocols and collecting metadata on their performance metrics to ensure the GRM's adherence with established procedures and identifying gaps in the GRM's functions. It mandates the GRM to furnish reports on its operations to industry bodies or regulatory authorities, and the wider public.

Finally, the principle of **capacity building** emphasises active feedback collection and its analysis to improve the GRM and the wider ecosystem. Actively seeking feedback from users to appreciate the difficulties they face, users' suggestions on improving grievance redress processes, and taking targeted actions based on recurring feedback can aid building the capacity of the GRM as well as the wider ecosystem to which it belongs. Further, user surveys, one-on-one conversations with them, are recommended to elicit user feedback which can help improve overall performance of the GRM. A systematic analysis of user-grievances enables the GRM to gain insights about recurring user issues and relay those to the other participants of the industry such as fellow service providers and regulators. Consequently, by actively working on these issues, the industry's capacity is enhanced.

While these principles and design features may not be exhaustive, they provide a starting point for imagining user-centricity of grievance redress channels for a wide range of providers. This framework must also be treated as material for referencing the different principles of user-centric GRMs. Accordingly, not all design features listed under the abstract principles may apply to each sector or provider. Evaluators may nuance this framework to suit the nature of the GRM being evaluated.

This is not a quantitative framework where numerical values can be assigned against the different questions of the principles, but a qualitative understanding of the GRM's existing features and gaps where they may be present. Where gaps are identified, this design framework can also be used to provide recommendations to the GRM for their improvement and compliance with best global practices. While this tool is intended to provide an *ex-ante framework* for designers of GRMs for a given organisation, enclosed is also a *post-diagnostic checklist tool* for evaluators to assess the performance of pre-existing GRMs.

**Figure 1** summarises the nine principles of evaluating the user-centricity of a given GRM, followed up a post-diagnostic evaluator's checklist.

Figure 1: Principles for designing user-centric grievance redress mechanisms

# Principles for designing user-centric grievance redress mechanisms



### Self-diagnostic tool for *ex-post* assessment of user-centricity of GRMs

This checklist provides a principle-wise list of design requirements that can be used for the evaluation of existing GRMs and assess their user-forward characterisation. Based on the *Evaluator response* against each question, evaluators can identify those design aspects that need to be introduced to their GRM to improve user experience.

|                      | Design requirements  | Evaluator response |
|----------------------|--|--------------------|
| <b>Accessibility</b> | Is the information about the access channels to the GRM widely publicised? Is it available through touchpoints familiar to the user? |                    |
|                      | Is the information publicised about the GRM easy to understand for the users?  |                    |
|                      | Is the information about the GRM available to users in a language that they understand?  |                    |
|                      | Is information about the GRM provided in alternative formats (for example, Braille, large-printed text, audio and graphic formats)?  |                    |
|                      | Are users able to access the GRM through multiple channels?  |                    |
|                      | Can users file complaints with the GRM through their representatives or more accessible channels like WhatsApp, IVRS etc.?           |                    |
|                      | Are users provided with assistance to navigate the GRM?  |                    |
|                      | Is the GRM designed to handle the current case load? Is it easily scalable?  |                    |

|                     | Design requirements  | Evaluator response |
|---------------------|--|--------------------|
| <b>Seamlessness</b> | Are users provided with the details of all the forms of redress available to them?   |                    |
|                     | Can the user pursue other legal remedies, even after engaging with the GRM?  |                    |
|                     | Is there a single, integrated front-end for consumers to register different kinds of complaints?   |                    |
|                     | Are there automated processes in place to address recurring complaints, when warranted?  |                    |
|                     | Is there a streamlined protocol between different departments in the back end to address the complaints received?  |                    |
|                     | Are the admissible complaint categories wide enough to admit uncommon cases?   |                    |
|                     | Is there a framework in place for identifying sensitive complaints that need to be prioritised?  |                    |
|                     | Are the GRM personnel able to register complaints on the users' behalf, escalate it to relevant departments and remain the point of contact for users throughout the life cycle of the resolution process? |                    |
|                     | Does the GRM place onerous requirements of paperwork and submission of evidence on the user?   |                    |

|                                | <b>Design requirements</b>  | <b>Evaluator response</b> |
|--------------------------------|---|---------------------------|
| <b>Proactive Communication</b> | Are users provided with an acknowledgement and the relevant information to track the status of their queries and complaints (such as token number etc.)?              |                           |
|                                | Is the process of tracking the status of queries and complaints by users easy?  |                           |
|                                | Are users informed of the maximum period within which the provider will give the final response to their query or complaint?  |                           |
|                                | Are resolutions that are provided to users discussed between both parties (i.e., both the provider and the user), or are they given to the user without any dialogue? |                           |
|                                | Are users pursued for feedback regarding their satisfaction the GRM process?  |                           |

|  | <b>Design requirements</b>  | <b>Evaluator response</b> |
|--|---|---------------------------|
| <b>Cost-effectiveness and Timeliness</b> | Is the access to the GRM free of monetary cost?   |                           |
|  | Is the time taken to file complaints reasonable?  |                           |
|  | Does the GRM accept complaints irrespective of the minimum amount in dispute?   |                           |
|  | Does the GRM accept complaints without imposing a limitation period?  |                           |
|  | Is the mode of resolution chosen adopted by the GRM suitable for the nature of its users' complaints (has the GRM considered different modes or options of complaint resolution such as pre-settlement, conciliation, mediation, arbitration etc.)? |                           |
|  | Does a protocol to resolve or escalate grievances promptly exist (for instance between 10-20 days or 15-30 days)?   |                           |
|  | Are the GRM personnel trained in soft skills, advanced listening skills, written and verbal communication skills, handling user feedback and problem-solving and conflict resolution?   |                           |

|                                 | <b>Design requirements</b>  | <b>Evaluator response</b> |
|---------------------------------|---|---------------------------|
| <b>Personal Data Protection</b> | Does the GRM inform users about the personal data that will be collected by the GRM and the purposes for which it will be used? |                           |
|                                 | Does the GRM request users for their consent for using their personal data?   |                           |
|                                 | Does the GRM limit itself in collecting personal data beyond that required for the process of grievance redress from the users? |                           |
|                                 | Does GRM store all personal data regarding the users with itself?   |                           |
|                                 | Is the personal data collected from users deleted by the GRM after the resolution of the corresponding complaint?               |                           |
|                                 | Is personal data retained by the GRM beyond the resolution of the corresponding complaints anonymised?                          |                           |
|                                 | Does the GRM have archival policies in place for the personal data of users retained beyond the resolution of their complaints? |                           |

|  |  |  |
|--|--|--|
|  | Does the GRM conduct periodic Data Protection Impact Assessments (DPIAs) of their data collection practices and storage facilities to identify risks arising out of the processing of personal data and minimise them as far and as early as possible? |  |
|  | Does the GRM have a Privacy by Design (PbD) policy in place for the personal data collected and stored by it?  |  |
|  | Are the GRM's data protection practices governed by an organisation-wide data protection policy?   |  |
|  | Does the GRM have a publicly available privacy policy that the users can access?   |  |
|  | Does the GRM have a protocol in place for when a personal data breach may occur?   |  |
|  | Do users have the option of requesting the correction or deletion of their personal data from the GRM?   |  |

|                    | <b>Design requirements</b>  | <b>Evaluator response</b> |
|--------------------|---|---------------------------|
| <b>Objectivity</b> | Are there standard protocols in place for handling complaints of every nature?  |                           |
|                    | Is there consistency and predictability in the resolutions and outcomes of similar complaints?                                      |                           |
|                    | Are there cases in which actions aside from the standard protocol are taken? Are these exceptions determined through set procedure? |                           |
|                    | Is anonymised user feedback data publicly available?  |                           |

|                                   | <b>Design requirements</b>   | <b>Evaluator response</b> |
|-----------------------------------|--|---------------------------|
| <b>Independence in Operations</b> | Are personnel of the GRM shielded from pressure and malicious incentives, allowing them to pursue redress objectively? |                           |
|                                   | Do users face any negative consequences for filing complaints with the GRM?  |                           |
|                                   | Are there procedures in place that penalise entities that may be egregious, or do not follow the stipulated protocols? |                           |

|                       | <b>Design requirements</b>  | <b>Evaluator response</b> |
|-----------------------|---|---------------------------|
| <b>Accountability</b> | Is there a code of conduct for the GRM personnel to follow when interacting with users?   |                           |
|                       | Are there specific personnel identified who ensure the compliance of the GRM with best practices?   |                           |
|                       | Are there protocols and safeguards in place for auditing grievance redress data ( <i>including complaint reference numbers, name and contact details of the consumer, date, demographics, channel for seeking redress, type of product in question, description of the complaint, assigned staff, investigation records, steps taken by FSP, response and resolution</i> )? |                           |
|                       | Is there a degree of oversight on the GRM by a board or a committee?  |                           |
|                       | Is the complaints data received by the GRM further reported to  |                           |

|  |  |  |
|--|--|--|
|  | any regulatory or quasi-regulatory authorities?                                |  |
|  | Is metadata on the performance of the GRM made available in the public domain? |  |

|                          | <b>Design requirements</b>  | <b>Evaluator response</b> |
|--------------------------|---|---------------------------|
| <b>Capacity Building</b> | Are there feedback loops in place to analyse complaints to identify patterns of grievances and gaps in service provisioning?  |                           |
|                          | Is there any feedback on the grievance redressal process taken from the user after their complaint has been resolved and/or closed? How is this feedback collected? |                           |
|                          | Is anonymised complaints data publicly available?   |                           |

## 1. Introduction

A grievance redress mechanism (GRM), (may also be referred to as complaints-handling) refers to formal institutions and channels that allow users<sup>1</sup> to air grievances related to the goods or services provided by an organisation or a government-sponsored program and obtain redress (Bassett et al., 2012).

User-centric grievance redress is essential in creating a user-forward product or service. User-centricity in the context of GRM demands that it be made available to the most hard-to-reach (or vulnerable or marginalised) users (Porteous & Helms, 2005; Asian Development Bank, 2010). Where the delivery of a good or service is not as per the expectations of the user, or where the use of a service causes them harm, access to a GRM provides users with a forum to air their complaints. The mere presence of a GRM can instil confidence among users and signal the providers' commitment to addressing their issues (Institute for Consumer Policy, 2017). Further, GRMs assume a role wider than just resolving grievances. They may also double up as user support, entertaining queries and handholding users, thus improving their overall experience. For instance, in the case of digital finance, several user groups may be first-time users of not just digital finance but also of internet-enabled digital interfaces who may face difficulties in navigating both the service and the interface. In these instances, the availability of a GRM empowers users to approach it and resolve their queries, helping them navigate the service (Gram Vaani & National Institute of Public Finance and Policy, 2021). Over and above the benefits of user-centric GRM for individual users, it also benefits the ecosystem. An effective analysis of grievances received via the GRM allows providers to surface systematic issues such as information on procedural difficulties faced by different user segments, common reasons for dropouts, most frequently cited issues with the products etc. This enables providers to recalibrate the design of their services and delivery mechanisms to better suit the needs of their users. For instance, from a qualitative analysis of grievances emerging from welfare delivery programmes, authors were able to identify factors of exclusion at different stages of the welfare schemes being studied and provide action paths to reduce them (Dvara Research, 2021). As we transition into a predominantly digital economy, particularly in commerce, finance, and the delivery of social welfare services, the opacity surrounding the roles of various entities and processes in product and service delivery is increasing, while human interaction is decreasing (Giannozzi & Khan, 2011). This further accentuates the need for accessible, seamless, and holistically user-centric GRMs to both handhold users through this transition and provide them with a forum to air and redress their grievances.

The imperative to design user-centric GRM raises the question, *what are the features of such a GRM?* The literature on principles for designing user-centric GRMs is rich. Several movements such as greater consciousness around user experience as a differentiating factor in providing services (Asian Development Bank, 2010), regulatory emphasis on customer protection via grievance redress (Centralized Public Grievance Redress And Monitoring System, n.a.), and the need for extending effective forums for citizens to voice opinions and raise grievances with government's development agenda (such as mining in forest land) or government's service delivery (such as benefit delivery) have provided an impetus to conceptualise user-centric GRMs (Ministry of Environment, and Urbanisation and Climate Change, 2022, p. 6; PT AECOM Indonesia, 2018).

While user-centric GRMs have been sufficiently conceptualised, there appears a gap in their characterisation and further operationalisation, i.e., breaking down what may appear as abstract principles of user-centric GRMs into specific design features. Accordingly, this brief presents a framework comprising 9 principles and attendant design features that guide the creation of user-centric GRMs. This assessment framework can be used *ex-ante* to create a user-centric GRM or *ex-post* to assess the user-centricity of an existing GRM.

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<sup>1</sup> Across this brief, the term "user" refers to any individual, customer, citizen, or beneficiary who may be availing goods or services from a private or a public service provider. As discussed later, the evaluation framework for grievance redress mechanisms (GRMs) discussed in this brief is equally applicable to private and public providers.

The GRM user-centricity framework presented in this policy brief benefits from a survey of literature on grievance redressal platforms both in India and globally, and several guidance documents on the creation of citizen-forward grievance redressal channels (available in **Annexure - 1**). An analysis of this literature surfaces recurring themes and principles that are widely recognised as indicators of user-centric GRMs. These principles are then operationalised into specific design elements, building on the literature and Dvara Research's understanding of the vulnerabilities of the users at the last-mile.

This design framework is anchored in the use-case of an internal GRM as provided by a financial service provider (FSP) to illustrate the hurdles faced by users in the sector such as information asymmetry, the unpredictability of outcomes and difficulty in identifying liable parties, especially in the case of digital financial transactions. However, this framework may equally be applicable to the creation of GRMs in cases of government welfare delivery services or even other private contexts such as e-commerce. The next section presents nine abstract principles that have been distilled from the literature. These principles have been broken down into design characteristics that a GRM must demonstrate to embody the corresponding principle. To reiterate, the framework is intended to be used as a blueprint for designing user-centric GRMs either *ex-ante* or to surface the gaps in the design of a GRM, *ex-post*.

## **2. Design features of a user-centric Grievance Redress Mechanism (GRM)**

### **2.1. Accessibility**

*Users can approach the channel of redress easily*

This principle dictates that users must find it easy to approach the GRM. As such, the GRM provider needs to take steps to ensure that the users know of the existence of available grievance channels, and then, be able to approach them. For instance, in India in the financial sector, grievance redress channels exist at three main levels: internal GRMs of the FSPs, GRMs provided by industry bodies or self-regulatory organisations (SROs) to the users of the corresponding industry (e.g., the Customer Grievance Redress Mechanism (CGRM) operated by the microfinance SRO, MFIN), channels provided by regulators (such as the Integrated Ombudsman of the RBI) and specialised consumer courts (Consumer Courts) available through the Consumer Protection Act, 2019 (Chivukula, 2021). However, it is noted that the redress mechanism available at the regulatory level, typically does not entertain grievances unless they have first been raised with the service provider while the consumer courts face high levels of pendency<sup>2</sup>. Thus, it becomes even more important for the GRMs at the FSP's level to be accessible to all aggrieved consumers, as it is often their first (and mandatory) point of redress. In the specific case of financial services, an accessible GRM helps a user trust the FSP and may potentially improve their comfort with availing formal financial services (Koning & Murthy, 2017, p. 39).

It is possible that users do not approach GRMs because they may not know of their existence. Even where information about a GRM is publicised, it may either not be available at locations or touchpoints which users engage with often or in languages or formats they readily understand. For instance, among microfinance members, there was a tendency to bypass their microfinance provider and directly approach the GRM of the SRO. On further probing, it was found that users either did not know of the provider's GRM or could not differentiate between the GRM of the SRO and that of the provider (Chugh & Singh, 2023, p. 10). Further, users may also hesitate in approaching GRMs as they may not have faith in them. In one study of UPI users, users reported not approaching the GRM for erroneous or fraudulent transactions, believing that the GRM was powerless in helping them (Narayan & Prasad, 2023). Consequently, despite efforts being made by the providers to publicise their GRM channels, users may not be comfortable approaching it (World Bank Group, 2019, 2022). To prevent

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<sup>2</sup> In 2021, the National Consumer Redressal Commission (NCDRC) had 22,472 pending cases, which is more than double the pending cases in 2017, when there were 9,106 pending cases (Khan, 2021).

this, relevant information about the procedure to register complaints including the prerequisite details and documentation, the format of registering complaints and the eligibility for approaching the GRM should be designed and disseminated to be readily comprehensible to all users (International Organization for Standardization, 2014).

Further, being sensitive to the lived context of the user base while publicising this information can enhance its effectiveness (Australian Financial Complaints Authority, 2021). Where users may have limited internet connectivity, providers may disseminate important information through physical offices and branches that users visit frequently. Similarly, where the user base may have lower literacy rates, providers could make the effort to create content that can be consumed in audio or visual format to be played at the physical offices and branches (Giannozzi & Khan, 2011) or even disseminated over social media and instant personal messaging services. GRMs may consider leveraging the use of instant messaging services such as WhatsApp which are gaining popularity to not just communicate with users, but also for filing complaints. These apps usually offer functionalities such as recording audio notes and videos and sending photos that can be used by users who may not be able to textually submit their complaint. The MFIN-CGRM for instance, employs WhatsApp to accept documents related to users’ complaints (Chugh & Singh, 2023). Where the process of registering complaints may be technical, FSPs could depute personnel, either at the field level or at the point of registration, to assist users with the process (Porteous & Helms, 2005). From our conversation with the MFIN-CGRM personnel, we understand that field agents of MFIs often extend timely and frictionless recourse to borrowers, reducing the case load in the formal channels (Chugh & Singh, 2023). Similarly, another study uncovers demand for assistance in filing complaints in the RBI’s Ombudsman Scheme (Gram Vaani & National Institute of Public Finance and Policy, 2021).

Accordingly, the following list provides eight design characteristics that contribute towards creating an accessible GRM.

Is the information about the access channels to the GRM widely publicised? Is it available through touchpoints familiar to the user?

Is the information publicised about the GRM easy to understand for the users?

Is the information about the GRM available to users in a language that they understand?

Is the information about the GRM provided in alternative formats (for example, Braille, large-printed text, audio and graphic formats)?

Are users able to access the GRM through multiple channels?

Can users file complaints with the GRM through their representatives or more accessible channels like WhatsApp, IVRS etc.?

Are users provided with assistance to navigate the GRM?

Is the GRM designed to handle the current case load? Is it easily scalable?

## 2.2. Seamlessness

*The process for complaint registration is frictionless for the user*

This principle dictates that the GRM be designed in a manner that reduces the burden on users and promotes efficient redressal by establishing a frictionless process for registering complaints.

It is often noted that users are unable to decipher the right forum for airing grievances. This may be due to the presence of parallel redress channels that may handle different categories of grievances, making it difficult for users to identify the correct forum. For instance, until November 2021, when the RBI graduated to an integrated ombudsman scheme, aggrieved users were responsible for identifying the appropriate Ombudsman for their complaint, among the three different Ombudsmen, making seeking redress that much more challenging for them (Chivukula, 2021). Further, where there are multiple entities involved in a transaction that may have aggrieved the user, it is onerous if not impossible for the user to detect the faulting entity and complain against them. Yet, identification of the faulting party is in most formats a pre-requisite for registering complaints. These procedural hurdles are burdensome to the average user and more so to the less savvy. They may dissuade users from registering complaints altogether. To address this, GRM providers should strive to create a seamless, frictionless complaint-registration experience for users. In this regard, a singular, unified, channel equipped to receive all manner of grievances is seen to be user-centric (Asian Development Bank, 2010). However, this unified front-end channel must be complemented with a coordinated, protocol-driven mechanism at the back-end, that routes the complaints to relevant entities or departments within the grievance redress system. A coordinated back-end can assist in the identification of parties at fault and avoid the necessary follow-ups and escalations with involved parties (World Bank Group, 2019). Further efforts must be made to ensure that the responsible party proactively communicates with the user and also updates the users' touchpoint on the complaint status. This allows users to rest assured knowing that they will receive an update regarding their resolution from the responsible entity, as well as from the same point of contact where they first registered their complaint, if they so prefer.

In addition to the above-mentioned processes to triage user complaints at the back-end of a GRM, automation may be introduced when complaints are of a standard nature and do not warrant human judgment. Automatic escalations to relevant departments or organisations or forums can streamline complaint resolution and establish self-sufficient, potentially swifter processes.

Complaint categorisation is also crucial to the principle of seamless redress. The providers' protocol for the back-end coordination of complaints must reflect the nature of the grievance. Users may report a wide range of grievances to the GRM. For instance, grievances that require simple provider-related service actions may be addressed sooner and their resolution may even be automated. Such automation is seen, for instance, in UPI where failed transactions are auto-reversed without any long-drawn processes (Reserve Bank of India, 2019). The MFIN-CGRM categorises incoming complaints as *non-critical* and *critical* complaints. While most complaints are considered *non-critical* and follow the regular procedure of resolution, *critical* complaints are handled with urgency and have different protocols for turn-around-time (TAT) among other things (MFIN, 2020). Accordingly, based on the resources required to address a given grievance, GRM providers may consider creating categories of user complaints, and establish protocols and parameters for their quick and seamless resolution. These protocols may include the prioritisation of specific categories of grievances, the creation of dedicated teams within the GRM for different categories and allocating category-specific TATs for resolutions (Gulati & Sane, 2022).

Due to the potential presence of multiple parties in the resolution of complaints, delays in the provision of resolutions can occur. These may result in users following up with the GRM for their resolution. GRMs can benefit from the integration of automated technological capabilities that help the user to track the status of open complaints (World Bank Group, 2022). Where delays are observed, automated escalations and follow-ups with relevant personnel or departments can reduce, as well as real-time correspondence with relevant users can prevent any undue anxiety caused to the user. The state of Haryana offers Antyodaya Saral scheme, a unified platform to deliver and track government-to-citizen (G2C) services across the state. This platform is designed to automatically escalate those complaints which have not been acted upon to relevant officers. It also has an auto-appeals scheme,

where an automatic appeal is filed to the first grievance redressal level by the system in case the notified timelines are breached (Chugh & Singh, 2023)

Further, seamlessness is enhanced when the GRM personnel acts as the single point of contact for all information relating to a user’s complaint. To prevent user drop-offs, effort must be made to not redirect users to different departments of the GRM, or the provider for their complaint to be registered and addressed. Coordination between different departments within and outside the GRM in the backend can be optimised by automation of protocols of different categories of complaints. In cases where the provider GRM is unable to resolve the user complaint in a satisfactory manner, and where there exists an option for the user to appeal to a higher authority’s grievance redress channel, the GRM personnel may assist the user to escalate their complaint to such a channel for resolution.

Accordingly, the following list provides ten design characteristics that contribute towards creating a seamless redress experience for users.

- Are users provided with the details of all the forms of redress available to them?
- Can the user pursue other legal remedies, even after engaging with the GRM?
- Is there a single, integrated front-end for consumers to register different kinds of complaints?
- Are there automated processes in place to address recurring complaints, when warranted?
- Is there a streamlined protocol between different departments in the back end to address the complaints received?
- Are the admissible complaint categories wide enough to admit uncommon cases?
- Is there a framework in place for identifying sensitive complaints that need to be prioritised?
- Are the GRM personnel able to register complaints on the users' behalf, escalate it to relevant departments and remain the point of contact for users throughout the life cycle of the resolution process?
- Does the GRM place onerous requirements of paperwork and submission of evidence on the user?

### 2.3. Proactive Communication

*Users are informed about their complaint status and are provided clarity on the process of obtaining redress*

This principle dictates that users have visibility on the process as well as the progress of the complaint they may have registered with the GRM. This assures the user at any given time that their complaint is being addressed.

Opacity regarding the movement of their complaints, can sap the users’ confidence, and cause undue anxiety. Users benefit from a tangible and immediate acknowledgement of their complaints (World Bank Group, 2019). An acknowledgement message carrying a unique identification token or reference number that allows users to track the progress of their complaint via platforms such as Interactive Voice Response System (IVRS) or online portals may prove to be a helpful first step in proactive communication. This information is critical for users to understand the level of escalation of their complaint and to trust the grievance redress process. Additionally, users should be informed of the expected processing time, maximum response time, and the expected medium of response. If a complaint is refused, users must be informed and provided with information on how to escalate their grievance to the appropriate authority (Otoritas Jasa Keuangan, 2014; Koning & Murthy, 2017; Bank

of Ghana, 2017). To further instil trust in users towards the GRM, they must be proactively given ongoing updates on their registered complaints, as the complaint moves along the different stages of complaint resolution. These updates may be provided through users’ preferred modes of communication, be it through WhatsApp, SMS, pre-recorded incoming calls etc. (Agarwal, 2013).

Accordingly, the following list provides five design characteristics that contribute towards proactively communicating with GRM users.

Are users provided with an acknowledgement and the relevant information to track the status of their queries and complaints (such as token number etc.)?

Is the process of tracking the status of queries and complaints by users easy?

Are users informed of the maximum period within which the provider will give the final response to their query or complaint?

Are resolutions that are provided to users discussed between both parties (i.e., both the provider and the user), or are they given to the user without any dialogue?

Are users pursued for feedback regarding their satisfaction with the GRM process?

#### 2.4. Cost-effectiveness and Timeliness

*The redress process is time and cost-effective for the user*

This principle dictates that redress processes should be quick, easily navigable, and efficient to reduce the time and money costs that users incur while seeking redress. As mentioned earlier, GRMs should be designed by keeping in mind the needs of the most vulnerable user of an organisation (Porteous & Helms, 2005; Asian Development Bank, 2010). Users may experience friction in accessing the GRM due to monetary constraints or ceilings on the amount of dispute. This can be prevented by ensuring that GRMs remain free-of-monetary cost to use, do not impose thresholds of permissible amount in dispute, or age of the complaint, into the GRM.

From a small sample of 92 microfinance users, it was noted that 75% of these users owned smartphones (Chugh & Singh, 2023). Accordingly, GRMs may consider the use of popular internet-based messaging services that may be integrated with chatbots for their communications with users. Many of these services provide a combination of list messages and reply buttons that users can interact with to reach adequate redress channels and file their complaints using pre-set options (Gabriella, 2022). These services may even be free to use for both the provider and the user, and would only require users to have a smartphone with the WhatsApp application installed. This can reduce both the time and cost of reaching a GRM for the users.

Timely redress of complaints by the GRM is essential to maintain user confidence in the process and prevent any negative impact on their well-being. To ensure the timely resolution of complaints, the GRM should follow a prompt complaint resolution model. An example of a detailed timeline for resolution is set out in the *Bank of Ghana’s* guidelines for consumer recourse mechanisms for FSPs. According to this guidance, the FSPs are required to provide consumers with an acknowledgement of their complaint within 5 days from its receipt, and attempt to resolve such a complaint within 20 days (the initial 5-day acknowledgement period included), and an additional 10 days where more time might be required (Bank of Ghana, 2017). Similarly, Indonesia’s *Otoritas Jasa Keuangan* (OJK) (the Indonesian financial services authority) requires FSPs to take immediate action upon the receipt of a complaint and resolve them within 20 days of receiving them. Where more time may be required, an additional 20 days may be taken, but only after informing users of the specific reason for such a delay (Otoritas Jasa Keuangan, 2014).

In addition, GRM personnel should receive adequate training to efficiently and accurately register grievances and collect all relevant information for timely complaint redressal. Complaints should be addressed based on their level of urgency to prioritise users' needs (Porteous & Helms, 2005; Otoritas Jasa Keuangan, 2014; World Bank Group, 2019).

Accordingly, the following list provides seven design characteristics that contribute towards providing cost-efficient and timely redress to users.

Is the access to the GRM free of monetary cost?

Is the time taken to file complaints reasonable?

Does the GRM accept complaints irrespective of the minimum amount in dispute?

Does the GRM accept complaints without imposing a limitation period?

Is the mode of resolution chosen by the GRM suitable for the nature of its users' complaints (has the GRM considered different modes or options of complaint resolution such as pre-settlement, conciliation, mediation, arbitration etc.)?

Does a protocol to resolve or escalate grievances promptly exist (for instance between 10-20 days or 15-30 days)?

Are the GRM personnel trained in soft skills, advanced listening skills, written and verbal communication skills, handling user feedback and problem-solving and conflict resolution?

## 2.5. Personal Data Protection

*Standards and practices are in place to protect the personal information submitted by the user*

This principle dictates that the personal data collected from users during the process of registering or processing their complaints be kept confidential. A significant amount of personally-identifiable data of users is collected throughout the life cycle of processing a complaint. With the increasing digitisation of finance and social welfare delivery to improve efficiency, concerns regarding privacy and exposure to cyber risks also increase. Lack of adequate data protection practices by the FSP can lead to financial fraud and other harms, severely eroding the trust of consumers in FSPs (Raghavan, et al., 2019; Prasad, 2021).

Any data collected from the user should only be used to provide redress for their complaint. To address this, GRMs should (i) adhere to well established data protection principles, (ii) actively communicate their data protection practices to the users and wider public via a privacy policy, (iii) maintain a robust data security infrastructure and audit it frequently (International Organization for Standardization, 2014; Sharma & Nageshwaran, n.a.).

Accordingly, the following list provides thirteen design characteristics that contribute towards protecting of consumers' personal data when interfacing with the GRM.

Does the GRM inform users about the personal data that will be collected by the GRM and the purposes for which it will be used?

Does the GRM request users for their consent for using their personal data?

Does the GRM limit itself in collecting personal data beyond that required for the process of grievance redress from the users?

Does GRM store all personal data regarding the users with itself?

Is the personal data collected from users deleted by the GRM after the resolution of the corresponding complaint?

Is personal data retained by the GRM beyond the resolution of the corresponding complaints anonymised?

Does the GRM have archival policies in place for the personal data of users retained beyond the resolution of their complaints?

Does the GRM conduct periodic Data Protection Impact Assessments (DPIAs) of their data collection practices and storage facilities to identify risks arising out of the processing of personal data and minimise them as far and as early as possible?

Does the GRM have a Privacy by Design (PbD) policy in place for the personal data collected and stored by it?

Are the GRM's data protection practices governed by an organisation-wide data protection policy?

Does the GRM have a publicly available privacy policy that the users can access?

Does the GRM have a protocol in place for when a personal data breach may occur?

Do users have the option of requesting the correction or deletion of their personal data from the GRM?

## 2.6. Objectivity

*The GRM can consistently process and resolve the complaints received by it in an equitable and unbiased manner*

This principle dictates that complaints consistently be handled objectively. The treatment of every complaint received by the provider's GRM must remain consistent, objective and unbiased irrespective of the region, the amount in dispute etc. Demonstrating objectivity in grievance redressal builds the credibility of the GRM and signals fairness of resolutions to aggrieved users (Fitzgerald, 2011).

Establishing and following protocols instituted for resolutions of different complaint categories, complaints of varying sensitivity can help the GRM to treat similar complaints similarly, regardless of other markers such as the organisation, demographics of the user etc. The GRM could also refer to similar past complaints and apply the same resolution where appropriate. This helps ensure objectivity in the treatment of complaints and can prevent bias or inconsistency in complaint resolution. By establishing clear, consistent, and pre-defined protocols for complaint resolution, GRMs can enhance user satisfaction and trust in the complaint redressal process (Asher et al., 2013).

Accordingly, the following list provides four design characteristics that contribute towards maintaining the objectivity of the treatment of complaints within the GRM.

Are there standard protocols in place for handling complaints of every nature?

Is there consistency and predictability in the resolutions and outcomes of similar complaints?

Are there cases in which actions aside from the standard protocol are taken? Are these exceptions determined through set procedure?

Is anonymised user feedback data publicly available?

## 2.7. Independence in the Operation of the GRM

*The GRM is functionally independent from other departments and organisations*

This principle dictates that the entity that provides redress to users remain independent in its role and functions from the rest of the operations of the organisation. To ensure the robust functioning of the GRM, it should not face pressure or an incentive misalignment from the organisation against whom it may collect and process grievances (Porteous & Helms, 2005). This can be achieved by ensuring that no internal departments of the organisation are able to influence the functioning of the GRM (Asher, Dee, & Wood, 2013). Independence of the GRM can also be brought about by ensuring that the personnel handling the GRM do not hold other positions in the organisation whose functions conflict with their functions of the GRM. For example, within the MFIN are housed the Self-regulatory Organisation Committee (SROC) and the Enforcement Committee (EC) (which operates under the supervision of the SROC) which are composed of a majority of independent members. These committees, amongst their other supervisory functions, also identify systemic and recurring issues from the complaints received by the MFIN-CGRM and hold responsible member institutions accountable for the same (MFIN, 2019).

In addition, it must be ensured that users approaching the GRM do not face any backlash or adverse consequences from members of the organisation or system (for filing the complaint). Given that a GRM does not operate in isolation from other entities in the system, it must be designed with the intent of providing psychological safety to users so that they can participate in the same without the fear of intimidation (Asian Development Bank, 2010, p. 5).

Accordingly, the following list provides three design characteristics that contribute towards maintaining the independence in the operations of the GRM.

Are personnel of the GRM shielded from pressure and malicious incentives, allowing them to pursue redress objectively?

Do users face any negative consequences for filing complaints with the GRM?

Are there procedures in place that penalise entities that may be egregious, or do not follow the stipulated protocols?

## 2.8. Accountability of the GRM

*The GRM complies with best practices of providing redress and reporting on the same*

This principle dictates instituting systems to ensure that the GRM is compliant with the protocols set out for its functioning. Accountability is an important feature for the effective functioning of any organisation. For GRMs, accountability can be ensured by mandating reporting channels to an industry body or regulatory authority (or both) by ensuring staff compliance with established

procedures and conducting periodic checks of the same. Per *Bank of Ghana's* guidelines for consumer recourse mechanisms for FSPs, FSPs are required to regularly report to the regulator specific data points that include the number of complaints received (and segregated by age, gender, branch, product type, client type, mode of receipt, and nature of the complaint), complaints resolved, complaints pending, and cases referred to the regulator (Bank of Ghana, 2017).

Regular feedback from users of the GRMs for their grievance redress process through surveys can also provide insights into how the GRM may be performing. Anonymised complaints data can also be published by the GRM for use by academics and policymakers for further analysis (Consumer Financial Protection Bureau, n.a.). GRMs may also consider the publication of their metrics at an aggregate level. These metrics are like those submitted to the regulator (e.g., number of complaints received, pendency levels, TATs etc.). Finally, upon providing resolutions to users, GRMs may consider communicating with such users to confirm that the promised resolution has been implemented and if they are satisfied with the resolution. The MFIN-CGRM practices this with all their users before considering these complaints closed (MFIN, 2020).

Accordingly, the following list provides six design characteristics that contribute towards enhancing the accountability of the GRM.

Is there a code of conduct for the GRM personnel to follow when interacting with users?

Are there specific personnel identified who ensure the compliance of the GRM with best practices?

Are there protocols and safeguards in place for auditing grievance redress data (*including complaint reference numbers, name and contact details of the consumer, date, demographics, channel for seeking redress, type of product in question, description of the complaint, assigned staff, investigation records, steps taken by FSP, response and resolution*)?

Is there a degree of oversight on the GRM by a board or a committee?

Is the complaints data received by the GRM further reported to any regulatory or quasi-regulatory authorities?

Is metadata on the performance of the GRM made available in the public domain?

## 2.9. Capacity Building

*The GRM actively collects feedback from users and analyses it for its regular improvement and that of the wider ecosystem*

This principle dictates that the GRM use the feedback it receives from multiple channels to not only improve its grievance redress processes but to also improve the industry within which it is situated, thus trying to improve user outcomes. While the grievances that a GRM receives are feedback in themselves about the provider, GRMs should actively seek feedback from users who have undergone the entire process to determine the kind of difficulties faced by them, what helped them during the process, and what could have made the process of attaining redress easier for them (Joint FCPF/UN-REDD Programme, 2015).

User surveys or one-on-one conversations with users following the resolution of their complaint can point towards specific improvements in the grievance redress process that can be implemented. Recurrence of feedback can push both the GRM and the provider to take pointed actions such as the creation of user awareness programmes, specialised training of personnel or adjustments to the existing categorisation of complaints and their predetermined treatment protocol, amongst other actions (Fitzgerald, 2011).

Accordingly, the following list provides three design characteristics that contribute towards the capacity-building feature of the GRM.

Are there feedback loops in place to analyse complaints to identify patterns of grievances and gaps in service provisioning?

Is there any feedback on the grievance redressal process taken from the user after their complaint has been resolved and/or closed? How is this feedback collected?

Is anonymised complaints data publicly available?

### **Conclusion: Using the assessment framework**

Grievance redress is an important feature of providing any service to users. It empowers users and builds their trust in the provider. Where the grievance redress channel may be hard to identify, or convoluted to use in terms of technical difficulties, it can leave users vulnerable and frustrated.

In this report, the authors have attempted to cover the spectrum of principles and their design characteristics which can be employed to assess the accessibility and performance of GRMs. While these may not be exhaustive, they provide a starting point for imagining user-centricity of grievance redress channels for a wide range of providers. This framework must also be treated as material for referencing the different principles of user-centric GRMs. Accordingly, not all design features listed under the abstract principles may apply to each sector or provider. Evaluators may nuance this framework to suit the nature of the GRM being evaluated.

This is not a quantitative framework where numerical values can be assigned against the different questions of the principles, but a qualitative understanding of the GRM's existing features and gaps where they may be present. Where gaps are identified, this design framework can also be used to provide recommendations to the GRM for their improvement and compliance with best global practices. While this tool is intended to provide an ex-ante framework for designers of GRMs for a given organisation, the post-diagnostic checklist as part of the Executive Summary provides a tool for evaluators using which pre-existing GRMs can be assessed for their performance on the different principles.

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**ANNEXURE - 1: List of Grievance Redress Mechanism literature referred to for creation of assessment checklist**

| <b>Literature</b>   | <b>Affiliation</b>   |
|---|--|
| <a href="#">Framework for MFIN's Customer Grievance Redressal Mechanism (CGRM)</a>  | Microfinance Institutions Network (MFIN)   |
| <a href="#">Feedback Matters: Designing Effective Grievance Redress Mechanisms for Bank-Financed Projects, Part-1. The Theory of Grievance Redress</a>                                    | World Bank   |
| <a href="#">Feedback Matters: Designing Effective Grievance Redress Mechanisms for Bank-Financed Projects, Part-2. The Practice of Grievance Redress</a>                                  | World Bank   |
| <a href="#">Client protection in microfinance companies in India</a>  | Manab Chakraborty (Indian Institute of Management, Kasipur)  |
| <a href="#">Policy Focus Note 2: Consumer Protection in Credit Markets</a>  | CGAP   |
| <a href="#">Protecting Microfinance Borrowers</a>   | CGAP   |
| <a href="#">How Much Voice for Borrowers? Restricted Feedback and Recursivity in Microfinance</a>   | Philip Mader (Institute of Development Studies (IDS))  |
| <a href="#">Grievance Redress by Courts in Consumer Finance Disputes</a>  | Karan Gulati, Renuka Sane (National Institute of Public Finance and Policy (NIPFP))                |
| <a href="#">Study regarding the problems faced by consumers in obtaining redress for infringements of consumer protection legislation, and the economic consequences of such problems</a> | Civic Consulting of the Consumer Policy Evaluation Consortium                                      |
| <a href="#">Rules, Roles and Controls: Governance in Social Protection with an Application to Social Assistance</a>   | World Bank   |
| <a href="#">Grievance Redress Mechanisms. Responsible Agricultural Investment (RAI)</a>   | World Bank   |
| <a href="#">Establishing and Strengthening Grievance Redress Mechanisms</a>   | Joint FCPF/UN-REDD Programme   |
| <a href="#">FCA Handbook (Redress)</a>  | Financial Conduct Authority (United Kingdom (UK))  |
| <a href="#">Financial Services and Markets Act 2000 (Part XXVIII: Consumer redress schemes)</a>   | UK Public General Acts   |
| <a href="#">Australian Financial Complaints Authority (AFCA) Rules &amp; Operational Guidelines to the Rules</a>  | Australian Financial Complaints Authority Limited (AFCA)   |
| <a href="#">Complaint Handling and Redress System for Retail Investors</a>  | International Organisation of Securities Commission (IOSCO)  |
| <a href="#">Investor Grievance Redressal Mechanism at Stock Exchanges</a>   | Securities and Exchange Board of India (SEBI)  |
| <a href="#">Guidelines for Customer Services and Complaint Management</a>   | Bangladesh Bank  |
| <a href="#">Quality management — Customer satisfaction — Guidelines for complaints handling in organizations</a>  | ISO 10002:2014(E)  |
| <a href="#">Protecting Microfinance Borrowers</a>   | David Porteous, Brigit Helms (CGAP)  |
| <a href="#">Models for Internal Complaint Systems and External Consumer Redress Schemes in ASEAN</a>  | Allan Asher, William Dee & John T D Wood (Foundation for Effective Markets and Governance (FEMAG)) |
| <a href="#">Handling and resolution of consumer complaints at financial services businesses</a>   | Otoritas Jasa Keuangan (OJK) (Indonesia)   |
| <a href="#">Consumer recourse mechanism guidelines for financial service providers</a>  | Bank of Ghana  |