

SMART LENDING: CLIENT PROTECTION IN THE GRAMEEN-STYLE GROUP LENDING PROCESS (INDIA)

An Overview for Incorporating Client Protection Practices into Group Lending by Microfinance Institutions in India

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INTRODUCTION

“Smart Lending: Client Protection in the Grameen-Style Group Lending Process”¹ is a tool for MFIs that want to incorporate good client protection practices into their group lending process. The tool is applicable to Grameen-style “group of groups” credit methodology and was developed specifically for Indian MFIs.

The group lending process is segmented into five key phases: (1) Client Recruitment & Application, (2) Compulsory Group Training & Group Recognition Test, (3) Group Loan Approval, (4) Disbursement & Customer Service, and (5) Collections & Recovery.

Like other Smart Tools,² this tool is structured as follows:

- The tool identifies distinct “**Service Points**” (SP’s)—points of interaction between the client and the institution. For each Service Point, the tool:
 - demonstrates how an MFI can model **good practice** in client protection in:
 - their policies, and
 - their operations; and
 - identifies which **Client Protection Principles** are affected; and
- The document provides recommendations for the use of client protection tools that could help MFIs improve client protection practices at each service point. These recommendations are listed in Annex 3. Some of these tools have already been developed by the Smart Campaign, but for those not listed on our website, we encourage you to share your tools and/or tool ideas with us (info@smartcampaign.org).

THE CLIENT PROTECTION PRINCIPLES (short form listed below; for complete description, see www.smartcampaign.org).

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| 1. Avoid Client Over-indebtedness | 4. Ethical staff behavior |
| 2. Transparent and responsible pricing | 5. Mechanisms for redress of grievances |
| 3. Appropriate collections practices | 6. Privacy of client data |

¹ These guidelines are the result of collaboration between The Smart Campaign, the technical staff of ACCION India and Indian based MFIs Ujjivan and Grameen Koota. This collaboration is ongoing and ACCION looks forward to sharing more such tools on related topics in the future.

Special thanks to: Hema Bansal, Amit Gupta, Ujjivan, Grameen Koota, Victoria White, and Leah Nedderman.

² The Smart Campaign offers a wide range of tools for improving client protection practices among MFIs, networks, and investors. Among these are: “Smart Lending: Client Protection in the Individual Loan Process;” and “Smart Savings: Client Protection in the Savings Process.” Visit www.smartcampaign.org to download these tools, at no cost.

PHASE I: CLIENT RECRUITMENT & APPLICATION

SERVICE POINT (SP)	SP1	SP2	SP3
	<p align="center">PROMOTIONS Institution promotes product(s) to potential clients.</p>	<p align="center">GUIDED GROUP FORMATION Clients are instructed to form groups and given guidance for good selection of group members.</p>	<p align="center">GROUP LOAN APPLICATION Institution guides groups through process of applying for a loan.</p>
<p>GOOD CLIENT PROTECTION POLICIES</p>	<ul style="list-style-type: none"> • Public disclosure of product terms, conditions, fees, and interest rates. • Compliance with all local legal requirements for marketing of financial services. • Staff incentives balance portfolio growth with portfolio quality to discourage over-lending to clients. • Staff book of rules defines acceptable recruitment policies, including whether staff may recruit clients from other institutions. • Internal audit checks staff interactions with clients for ethical behavior and compliance with client recruitment policies. • Institutional Code of Conduct spells out values and standard of conduct required by all staff, and clearly defines sanctions for unethical behavior. • Staff is trained how to follow ethics guidelines during promotions and group formation meetings. 		
<p>GOOD CLIENT PROTECTION PRACTICES</p>	<p>Clear communication with clients always includes:</p> <ul style="list-style-type: none"> • Use of local language(s) • Plain terminology • Verbal explanation for illiterate clients <p>For marketing materials specifically:</p> <ul style="list-style-type: none"> • Do not oversell benefits of credit. • Marketing materials should include: <ul style="list-style-type: none"> • Basic eligibility requirements for taking a loan; • Contact information for the institution; and • Instructions for registering a complaint or question. 	<p>For full disclosure regarding group loans, describe:</p> <ul style="list-style-type: none"> • Describe all costs associated with the product(s): price—including the total cost of the loan—the interest rate, and all associated fees. • All loan terms and conditions, including necessary documentation, eligibility criteria, conditions, any compulsory programs (e.g. insurance, savings), the use of client savings in the case of credit default, and how client data is used. • Group guarantee mechanism, including the rights and responsibilities of each group member; responsibilities in the case of a client death; and mandatory group/center requirements (attendance, group behavior, etc). • Process for loan recovery in case of late payments. • Consequences of over-indebtedness and why it is important for groups to avoid it. • Terms and conditions for top-up and repeat loans, as well as any compulsory products such as savings or insurance. • Requirements for security deposits or margin money. 	<ul style="list-style-type: none"> • Follow guidelines for “clear communication”—see SP #1. • Explain the client consent form and what a signature implies for the client/ group. • Include institution’s contact information on the application. • Explain how application data will be used and stored. • If an additional signature is required on the application, explain the responsibilities and limitations for the signatory. • Include any assets used as collateral on the application.
<p>CLIENT PROTECTION PRINCIPLES</p>	<p>Transparency; Ethical Staff Behavior</p>	<p>Avoid Over-indebtedness; Transparency</p>	<p>Avoid Over-indebtedness; Transparency; Ethical Staff Behavior; Privacy of Data</p>

PHASE 2. APPLICATION & APPROVAL

SERVICE POINT (SP)	SP4	SP5	SP6
	<p align="center">COMPULSORY GROUP TRAINING (CGT) Institution ensures groups have full information needed to succeed with loan product.</p>	<p align="center">BUSINESS AND HOUSEHOLD VISIT Institution meets with clients in their home and place of business to speak with family members and inquire about existing debt.</p>	<p align="center">GROUP RECOGNITION TEST (GRT) Institution tests group understanding of their responsibilities, disciplinary issues, products, services, benefits, and institutional policies and procedures.</p>
<p>GOOD CLIENT PROTECTION POLICIES</p>	<ul style="list-style-type: none"> • Institutional Code of Conduct spells out values and standards of conduct required by all staff, and clearly defines sanctions for unethical behavior. • Institutional policy details how to maintain the security and privacy of client data, and how/when to inform clients about the use of their personal and financial information. • Staff is trained on how to communicate clearly with clients in plain terms. • Staff is trained on how to apply the institution's Code of Conduct during CGT and GRT. • The Client Pledge includes a commitment not to borrow beyond one's repayment capacity. 		
<p>GOOD CLIENT PROTECTION PRACTICES</p>	<p>Training topics include:</p> <ul style="list-style-type: none"> • The institutional Code of Conduct and Client Pledge; • How to submit questions and complaints to the institution; • Important product features—see SP#2; • Importance of demanding cash receipts for all transactions and maintaining updated passbook entries; • Regulatory requirements that affect clients (e.g. Indian Know Your Customer [KYC] norms); • Each step of the credit process, including repayment and collections; • How to evaluate group members for credit worthiness and repayment capacity; • Importance of not borrowing beyond one's repayment capacity; • How to address unethical practices by staff; how to make a complaint. <p>Training specific to group leaders:</p> <ul style="list-style-type: none"> • Code of Conduct; ethical treatment of group members; cash handling; group conflict resolution; institution's policy on multiple borrowing; and how to address member grievances. <p>Other good practices:</p> <ul style="list-style-type: none"> • Rotate group leaders regularly. • The institution may choose to address financial literacy topics through financial literacy training programs. • Encourage clients to ask questions and share concerns throughout the CGT. 	<ul style="list-style-type: none"> • Follow guidelines for “clear communication”—see SP #1. • Explain product terms and conditions to the client's spouse and to other family members when applicable. • In case of compulsory insurance for client and spouse, the insurance premium, coverage and claim should be explained to the spouse. • Verify assets claimed by client. • Inquire about the household's existing loans. • Use information obtained during household and business visit to inform repayment capacity analysis. 	<ul style="list-style-type: none"> • Test clients' understanding of loan terms, pricing, and group guarantee mechanism. • Conduct GRT on a periodic basis, as loan terms and conditions may change. • Conduct a fresh GRT if more than two members in a group are replaced. • Internal audit and branch manager/regional manager should monitor GRTs for staff compliance with Code of Conduct. • GRT results could be analyzed to identify vulnerable areas for strengthening CGTs and staff training.
<p>CLIENT PROTECTION PRINCIPLES</p>	<p>Avoid Over-indebtedness; Transparency; Ethical Staff Behavior; Redress of Grievances</p>	<p>Avoid Over-indebtedness; Transparency</p>	<p>Transparency; Ethical Staff Behavior</p>

PHASE 3: FINANCIAL ANALYSIS & DATA MANAGEMENT

SERVICE POINT (SP)	SP7	SP8
	FINANCIAL ANALYSIS Institution analyzes personal and financial information and determines group eligibility and (if accepted) loan size.	DATA PRIVACY & MANAGEMENT Institution explains and ensures the security of client data through strong internal controls.
GOOD CLIENT PROTECTION POLICIES	<ul style="list-style-type: none"> The institution does not lend more than group members request or are capable of repaying. Loan approval does not rely solely on group guarantee mechanism. All lending decisions incorporate some capacity to repay analysis. As loan size increases, this analysis is increasingly thorough. Loan officers know the explicit guidelines for client debt thresholds and acceptable levels of debt from other sources. Internal audit routinely checks loan officers' use of financial analysis, and follows up with a sample of delinquent clients to check for over-indebtedness. 	
GOOD CLIENT PROTECTION PRACTICES	<ul style="list-style-type: none"> Ensure the entire group actively participates in loan approval process. Ask group to consider members': business type, credit needs, cash flow, etc. Group loan approval should be a unanimous decision. Institution's analysis of clients' capacity to pay should be as rigorous as possible, given the institution's time and resource constraints, and should include at least a calculation of the client's assets, liabilities, and household surplus. Collect data on other loans the client may have. This can be done through an interview, a credit bureau, or an information exchange between institutions. Debt guidelines may vary based on geographic area, business sector, and other relevant factors. Invest in acquiring available data so that the institution can make the best credit decision. The threat of client over-indebtedness should be continually monitored by the institution and by group members—e.g. an analysis of client over-indebtedness at the start of each new loan cycle. Consider limits on amount clients must pay when a group member is in default. This could be a percentage of the original loan amount. Shortly after disbursement, conduct a loan utilization check to verify appropriate use of loan by clients. If rejecting a loan application, inform the client(s) as to the reason(s). 	<ul style="list-style-type: none"> Explain how to protect: individual passbooks, client account numbers, savings cards, debit cards, and PIN numbers. Explain how client photos will be used and who will have access to them. Explain institution's policy on sharing an individual client's personal and financial information with the group. Disclose if the institution will use client information for marketing or cross-selling products. Prevent staff misuse of client information through use of strong internal controls. Strong data security means: <ul style="list-style-type: none"> Internal controls/ IT management; Clearly-defined user access and hierarchy; and, Frequently changing passwords. Include standards for client data protection in agreements with contracted third parties. Obtain authorization from clients before sharing financial information with third parties.
CLIENT PROTECTION PRINCIPLES	Avoid Over-indebtedness	Avoid Over-indebtedness; Redress of Grievances; Privacy of Data

PHASE 4: DISBURSEMENT & CUSTOMER SERVICE

SERVICE POINT (SP)	SP9	SP10	SP11
	<p>DISBURSEMENT SPEECH Institution verbally reviews important account information before opening account.</p>	<p>DOCUMENTATION Institution provides client with a summary document to take home.</p>	<p>ONGOING CUSTOMER SERVICE Institution continuously supports client satisfaction and product understanding.</p>
GOOD CLIENT PROTECTION POLICIES	<ul style="list-style-type: none"> Disbursement documents comply with local regulatory requirements. A sufficiently trained staff member is responsible for assembling all relevant information on the group's account. Clients have sufficient time to ask questions and address concerns. Cashiers do not handle loan documentation. Staff is evaluated and/or incentivized on the quality of their interactions with clients. Client complaints are taken seriously, investigated, and resolved in a timely manner. Staff is trained on the institution's complaints handling process. Clients receive copies/duplicates of any and all signed documentation. 		
GOOD CLIENT PROTECTION PRACTICES	<p>General:</p> <ul style="list-style-type: none"> Follow guidelines for "clear communication"—see SP #1. Verbally review each loan document with the group, including the repayment schedule. Read the summary sheet to the group—see SP #10, at right. Consider a poster on the wall near where the disbursement occurs to remind staff and clients of their rights and responsibilities. <p>Key Elements of Disbursement Speech:</p> <ul style="list-style-type: none"> Explain all costs (e.g. stamp duty, margin money, insurance, any other linked products, etc.). Advise clients not to pay additional fees or commissions to staff, beyond what is explained in disbursement speech. Explain impact of fees on amount disbursed, when deducted upfront. If the group shares liability, explain that individual clients control their own portion of the group loan. If other personal guarantors, explain their liability. If collateralized loans, review process. Advise clients to always ask for a receipt for all transactions. Explain what happens at the end of a loan term (e.g. repeat loans, closing the account), as well how the group is renewed/maintained. Provide clients with the time and opportunity to ask questions and to choose not to continue with the loan disbursement, based on their careful consideration of the above information. 	<p>Provide the client with a short summary sheet that includes:</p> <ul style="list-style-type: none"> The rights and duties of the client, the group, and the institution. The group/client repayment and amortization schedule. Complaints information, including the institution's contact information and information about any regional or national complaints agencies. Collections practices, consequences, and procedures in case of non-repayment. Information on how to request account information. Explain the summary sheet in non-legal terms and ask the group if they have questions or concerns. Ensure that each group member receives a signed copy of the summary sheet. 	<ul style="list-style-type: none"> In all communications with clients, follow communication guidelines outlined in SP #1. Honor account information requests in a timely way. Provide verbal account information to illiterate clients. Alert clients to upcoming changes in product terms, conditions, fees, or interest rates. Document, investigate, and resolve client complaints in a timely manner. Internal audit or other monitoring system should check that complaints are resolved satisfactorily. Do not use or share client information or photos (for marketing, promotions, etc.) without client consent. Include institution contact information on all materials, and post in service points such as branch offices.
CLIENT PROTECTION PRINCIPLES	Transparency; Ethical Staff Behavior; Mechanism for Redress of Grievances; Privacy of Client Data	Transparent and Responsible Pricing; Ethical Staff Behavior; Mechanism for Redress of Grievances	Transparency; Redress of Grievances; Privacy of Client Data

PHASE 5: COLLECTIONS & RECOVERY

SERVICE POINT (SP)	SP12	SP 13	SP 14	SP 15
	ON TIME COLLECTIONS Institution collects payments on scheduled day and in method outlined in loan contract.	COUNSELING AND GROUP GUARANTEE Institution supports delinquent clients to repay remaining installments.	ESCALATION (RECOVERY) Institution treats clients with dignity while collecting late installments.	BACK END PROCESS Institution carefully manages delinquent client information.
GOOD CLIENT PROTECTION POLICIES	<ul style="list-style-type: none"> • Institutional Code of Conduct provides guidelines on the collection process, especially treatment of delinquent clients. • Credit policies detail appropriate means for recovery of loans, and outline what constitutes unethical and coercive staff behavior. • Credit policy details a comprehensive restructuring policy (re-scheduling and refinancing). • Institution does not charge interest after loans are written off. • Agreements with third party agents stipulate privacy of client data. 			
GOOD CLIENT PROTECTION PRACTICES	<ul style="list-style-type: none"> • Check for regular passbooks updates if group leaders handle collections. • Use preventive recovery methods, such as reminders. • Always provide a receipt and give exact change. • Ensure that field collections happen on a specified day. • Collect money publicly and transparently. • Ensure that internal audit monitors center meeting collections. • Ensure that any third party collections agents agree to the institution's Code of Conduct. • Prevent theft (including internal) by carefully monitoring cash collection and setting limits on cash collection. 	<ul style="list-style-type: none"> • Provide special training to staff collecting late payments in the field. • Involve center leaders in managing recoveries. • Prohibit group leaders from: use of force, coercion, assertion of excessive group pressure etc. • Institution may consider restructuring in case of repayment difficulty. Ensure restructuring does not increase the debt levels of already indebted clients. • Consider referring clients with repayment difficulties to a counseling center. 	<ul style="list-style-type: none"> • As a first step, the escalation policy should engage the client and her group in a problem-solving session. As a second step, engage other important stakeholders—center leaders, village leaders, local functionaries, etc. • Prohibit staff and group leaders from: use of force, coercion, assertion of excessive group pressure, lengthy center meetings, humiliation etc. • Recovery practices should be monitored by branch managers and internal auditors and violations strictly sanctioned. • Recovery measures should be based on type of default: temporary vs. long-term problem; client death; willful default; mass default, etc. • Ensure clients understand penalties, additional charges, and adjustments. 	<ul style="list-style-type: none"> • Regularly update, cross-check, and verify group records to ensure that no undue penalties are levied on clients. • Management information systems should automatically reflect adjustment of security deposits. • Regularly update list of delinquent clients.
CLIENT PROTECTION PRINCIPLES	Appropriate Collection Practices; Ethical Staff Behavior	Appropriate Collection Practices; Ethical Staff Behavior; Redress of Grievances	Appropriate Collection Practices; Ethical Staff Behavior; Redress of Grievances	Privacy of Client Data

ANNEX 1: GLOSSARY OF TERMS FOR GRAMEEN-BASED GROUP LENDING METHODOLOGIES

- 1. Group Formation:** Five women who live in the same area and have known each other for the past 3-5 years come together to form a group.
- 2. Know Your Customer Norms:** Know your customer (KYC) is the due diligence and bank regulation that financial institutions and other regulated companies must perform to identify their clients and ascertain relevant information pertinent to doing financial business with them.
- 3. Compulsory Group Training (CGTs):** A group of five members are provided training on: products, services, policies and procedures, group guarantee concept, benefits and are also taught to sign their names.
- 4. Group Recognition Test (GRTs):** After CGTs, GRTs are conducted to test group understanding of their responsibilities, disciplinary issues, products, services, benefits, policies and procedures of the institution.
- 5. Security Deposit/Margin Money:** Amount collected by MFIs as security against loan funds. Generally, this amount is 10% of the loan amount. Security deposit can be withdrawn after closing the loan, adjusted against the last installment, or transferred to a new loan.
- 6. Center Meetings:** Each center typically is comprised of five groups and has mandatory weekly or fortnightly meetings. During these meetings, there are discussions regarding social/community issues, institutional developments, loan applications and collection of repayments.
- 7. Group Pledge:** Taken at weekly/monthly center meetings. Clients pledge to utilize the loan to enable them to get them out of poverty, repay loans on time, stand by their group members at all times, provide proper education to their children and maintain a good relationship with the Institution.
- 8. Staff Pledge:** Taken at weekly/monthly center meetings. MFI staff pledges to work with poor women towards eliminating poverty, without discrimination and be truthful to their activities.
- 9. Pre-Center Meeting:** Meetings conducted only by group members prior to the center meeting. During these meetings, the group leader collects repayment installments from the group members and generally discusses issues that they would like to raise in the center meetings.

ANNEX 2: PHASE DESCRIPTIONS

PHASE	PHASE DESCRIPTION
PHASE 1: CLIENT RECRUITMENT & APPLICATION	The group lending process begins with marketing and promotion to potential clients. Interested clients meet with a loan officer, during which time the loan officer provides a brief overview of the institution, product features, and basic terms and conditions. Based on this information, clients form groups. The loan officer completes the application form (customer details), checks identity proofs for validation, and conducts a preliminary assessment to ascertain eligibility of clients.
PHASE 2: COMPULSORY GROUP TRAINING & GROUP RECOGNITION TEST	In this phase, the group members participate in Compulsory Group Training (CGT) followed by Group Recognition Test (GRT). The process consists of the following steps: 1) Clients learn how to sign their names and are informed of the “Client Pledge”; 2) Clients learn more about the credit products, loan terms, and conditions; 3) Members elect group and center leaders who are trained on their roles and responsibilities; 4) Credit staff visit each client home to assess income and assets (clients’ ability to repay) and collect necessary documents to meet regulatory requirements; 5) Credit staff conducts the Group Recognition Test (GRT) of clients’ understanding of the concepts taught during CGT.
PHASE 3: GROUP LOAN APPROVAL	Once the group clears the GRT, loan applications are assessed and approved by the group are forwarded to the Branch Office or Regional office. The office enters the application information into the management information system (MIS) and runs a first round of checks related with customer verification (e.g. check for existing loans). After clearance from the MIS, the institution prepares for loan disbursement.
PHASE 4: DISBURSEMENT & CUSTOMER SERVICE	If the loan is approved, the loan officer informs the client about the loan approval, disbursement date and other requirements. The branch office prepares disbursement documents and cash. Once the client or groups arrive at the branch, a brief disbursement speech is made. The loan amount is handed over to the customer after taking her signature on all the necessary documents. A similar process is followed by institutions that disburse loans in the field at center meetings. In this case, the loan officer carries cash and all documents to the field, makes disbursements of loans through the group and center leaders and receives signatures.
PHASE 5: COLLECTIONS & RECOVERY	In this phase, the loan officer collects on-time repayments from clients at center meetings. In case of non-repayment at the center meetings, groups are counseled and the group guarantee mechanism is reiterated. In case repayments are not received, the institution follows their escalation matrix or delinquency management process. A good escalation matrix will keep group members/ leaders engaged and will gradually pressure to recover the overdue amount.

ANNEX 3: CLIENT PROTECTION TOOLS TO IMPROVE PRACTICE AT EACH SERVICE POINT

Institutions can benefit from the many tools already available for download on the Smart Campaign website, at no cost. Tools include guides for client protection in the individual lending process and the savings process; mini case-studies; Excel-based tools for calculating appropriate loan size; guidelines on how to develop an institutional Code of Conduct; a client protection self-evaluation for MFIs, and many more.

In the chart on the following page, each service point is listed alongside a list of client protection tools that can improve an institution’s ability to protect clients at that particular service point. Where these tools already exist through the Smart Campaign, a link is provided to the website. Other tools have yet to be developed and we encourage MFIs to develop these on their own, and share these developments with the Smart Campaign (info@smartcampaign.org).

SERVICE POINTS. The financial institution interacts with clients at the following service points:	CLIENT PROTECTION TOOLS. At each service point, the financial institution can improve its ability to protect clients by using the following tools:
SP #1. PROMOTIONS	Guide for the development of promotional materials; Sales dialogues for loan officers; Sample internal audit checklist for monitoring client recruitment; Guide for describing products to clients (e.g. checklist of points to cover).
SP #2. GUIDED GROUP FORMATION	Guide for communicating eligibility criteria to groups; Guide for describing the group guarantee mechanism; Group rights and responsibilities checklist.
SP #3. GROUP LOAN APPLICATION	Guide on how to request information from a client; Sample plain-language application form; Checklist of questions to review during preliminary assessment.
SP #4. COMPULSORY GROUP TRAINING (CGT)	Group training manual for loan officers; Group training materials for group leaders (in local language/ with pictures for illiterate clients).
SP #5. BUSINESS AND HOUSEHOLD VISIT	Checklist for topics to discuss with household; Worksheet for evaluating client’s assets.
SP #6. GROUP RECOGNITION TEST (GRT)	Internal GRT certification test for staff, focusing on over indebtedness and transparency; Question bank for GRTs.
SP #7. FINANCIAL ANALYSIS	Guide for communicating eligibility criteria to groups; Guide for how to talk to clients about over-indebtedness; Guidelines for financial evaluation; Financial evaluation worksheet/spreadsheet.
SP #8. DATA PRIVACY AND MANAGEMENT	Data management protocol manual; Sample third-party contracts that include agreements on privacy of client data; Checklist for internal audit to verify institutional compliance with data security measures. ³
SP #9. DISBURSEMENT SPEECH	Sample “plain language loan contract;” ⁴ Guidelines for disbursement speech; Sample disbursement speech; Sample script for disbursement notification (date, time, reminder on documents to bring).
SP #10. DOCUMENTATION	Guidelines for documentation requirements; Sample summary page. ⁵

SP #11. ONGOING CUSTOMER SERVICE	Guidelines for receiving and resolving client complaints; ⁶ Sample intake form; Guidelines for selling new products and renewing loans; Sample consent for use of client information/photos; Checklist for informing clients of term changes.
SP #12. ON-TIME COLLECTIONS	Guidelines for collections practices; ⁷ Sample Code of Conduct; ⁸ Sample internal audit checklist for monitoring collections practices.
SP #13. COUNSELING & GROUP GUARANTEE AND SP #14. ESCALATION (RECOVERY)	Guidelines for recoveries; ⁹ Sample restructuring policy & process (rescheduling & refinancing); Sample scripts for recoveries (for staff and group leaders); Training toolkit for group and center leaders for execution of group guarantee mechanism.
SP #15. BACK END PROCESS	Guidelines for updating delinquent client information.

³ For more information on data security see “Smart Note: Customized IT at Caja Morelia safeguards client data,” here: <http://smartcampaign.org/tools-a-resources/2/248>.

⁴ This resource is available through the Smart Campaign. Find an example of a plain language loan contract here: <http://smartcampaign.org/tools-a-resources/2/275>.

⁵ This resource is available through the Smart Campaign. Find an example of a loan contract summary here: <http://smartcampaign.org/tools-a-resources/2/276>.

⁶ The Smart Campaign offers resources on receiving and resolving client complaints, here: <http://smartcampaign.org/component/taxonomy/term/list/25/12>.

⁷ For more information on collections strategies, see ACCION International’s “Best Practices in Collections Strategies,” here: <http://smartcampaign.org/tools-a-resources/2/83>.

⁸ Download the Smart Campaign’s “How to Develop an Institutional Code of Conduct” here: <http://smartcampaign.org/tools-a-resources/2/84>. View sample Codes from around the world, here: <http://smartcampaign.org/tools-a-resources/2/44>.

⁹ For more information on collections strategies, see ACCION International’s “Best Practices in Collections Strategies,” here: <http://smartcampaign.org/tools-a-resources/2/83>.