



**CONSUMERS  
INTERNATIONAL**

COMING TOGETHER  
FOR CHANGE



# THE ROLE OF CONSUMER ORGANISATIONS TO SUPPORT CONSUMERS OF FINANCIAL SERVICES IN LOW AND MIDDLE INCOME COUNTRIES

March 2021

## DISCLAIMER

This work was funded in whole or in part by CGAP. Unlike CGAP's official publications, it has not been peer reviewed or edited by CGAP, and any conclusions or viewpoints expressed are those of the authors, and they may or may not reflect the views of CGAP staff.

## ABOUT CONSUMERS INTERNATIONAL

Consumers International is the global membership organisation for consumer rights groups. Founded in 1960, we bring together over 200 member organisations in more than 100 countries.

Consumers International has General Consultative Status at the United Nations and represents the consumer voice in international policy-making forums, developing international finance standards and global advocacy campaigns. Our work on financial services includes supporting the development of the G20 High Level Principles on Financial Consumer Protection and successfully campaigning for the inclusion of financial services protections in the 2015 comprehensive revision of the United Nations Guidelines for Consumer Protection.

Consumers International's mission is to empower and champion the rights of consumers everywhere and to build a fair, safe and sustainable marketplace.

## ABOUT CGAP

CGAP is an independent think tank that works to empower poor people, especially women, to capture opportunities and build resilience through financial services. We test, learn and develop innovative solutions through practical research and active engagement with our partners on building responsible and inclusive financial systems that help move people out of poverty, protect their gains and advance global development goals. Housed at the World Bank, CGAP is supported by over 30 leading development organizations committed to making financial services meet the needs of poor people.

For more information, visit <https://CGAP.org>.

## DEDICATION

This report is dedicated to Rosemary Siyachitema who contributed to this work. Rosemary was a celebrated consumer activist and the incumbent Executive Director of the Consumer Council of Zimbabwe. She was a board member of Consumers International and a wonderful colleague and friend.

# CONTENTS

EXECUTIVE SUMMARY .....	4
OBJECTIVES AND RESEARCH METHODOLOGY .....	4
RESEARCH FINDINGS: HOW CONSUMER ORGANISATIONS CONTRIBUTE TO GOOD FINANCIAL CONSUMER PROTECTION PRACTICES .....	6
Key characteristics of Consumers International members in low and middle income countries .....	6
Key approaches utilised by Consumers International members in low and middle income countries .....	8
Challenges experienced by consumers of financial services in low and middle income countries .....	10
ADVOCACY STRATEGIES USED BY CONSUMER ORGANISATIONS .....	12
Complaints handling and facilitating dispute resolution on behalf of consumers .....	12
Providing consumer debt counselling .....	13
Market research: monitoring provider products/ services quality and understanding consumer perceptions and behaviour .....	15
Consumer awareness-raising and education .....	18
Representing the consumer voice in the legislative and policy-making process .....	19
Public interest litigation to enforce consumer rights.....	21
CHALLENGES FOR CONSUMER ORGANISATIONS TO SUPPORT CONSUMERS OF FINANCIAL SERVICES .....	22
Establishing presence .....	22
Building resilience .....	22
Crisis response .....	22
OPPORTUNITIES AND RECOMMENDATIONS FOR FINANCIAL CONSUMER PROTECTION STAKEHOLDERS .....	23
For consumer organisations .....	23
For government, law/ policy-makers and regulators.....	23
For bilateral and multilateral organisations and foundations.....	24
LOOKING FORWARD: OPPORTUNITIES TO SHAPE FINANCIAL SERVICES FOR CONSUMERS OF THE FUTURE .....	25
Sustainable finance .....	25
Driving agile governance.....	25
Supporting the design of consumer-centred business models .....	25
FURTHER OPPORTUNITIES AND RECOMMENDATIONS .....	26
ACKNOWLEDGEMENTS .....	28

## EXECUTIVE SUMMARY

As technology delivers greater access to financial services, more consumers are now using financial products than ever before. A World Bank report<sup>1</sup> in 2018 found that 69% of adults in 2017 – 3.8 billion people – have access to a bank account as compared to 62% of adults in 2014 and 51% in 2011. In the developing world, the proportion of account owners sending and receiving payments digitally has grown from 57% in 2014 to 70% in 2017.

This report<sup>2</sup> describes the unique role consumer advocacy plays to ensure financial service marketplaces are safe, fair and sustainable for consumers, with approaches that are varied, relevant for the regional context and effective. The report shares the state of consumer protection for consumers of financial services in low and middle income countries and highlights six key approaches Consumers International members use to advocate for better financial consumer protection. These approaches range from direct engagement with consumers through complaints handling, to generating insights about the consumer experience through market research, to public interest litigation and consultations with policy-makers. In each case, we share a working case study.

We also propose a series of opportunities and recommendations for consumer organisations, governments and policy-makers, bilateral/multilateral organisations and foundations to strengthen their engagement with consumers of financial services. Key opportunities and recommendations include the formation of advocacy blocs to focus on future sustainable finance objectives; the establishment of financial services consumer protection law; and the provision of technical expertise from international organisations. All can help empower consumer organisations and the consumers of financial services they represent.

Finally, we look forward and predict how consumer organisations can shape the future world of financial services by engaging with sustainable finance, driving agile governance and supporting the design of truly consumer-centred business models.

## OBJECTIVES AND RESEARCH METHODOLOGY

The objectives of this research are to identify the various advocacy tools consumer organisations in low and middle income countries use to contribute to good financial consumer protection practices. We also illustrate the key challenges and opportunities for consumer advocates, and recommend areas where financial inclusion and consumer protection stakeholders can collaborate on financial consumer protection initiatives. This research highlights specific approaches and tools that consumer organisations use to protect, enforce and improve financial consumers' rights. It contributes to a broader study by CGAP to be published in spring 2021.

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<sup>1</sup> Measuring Financial Inclusion and the Fintech Revolution, The Global Findex Database, 2018.

<sup>2</sup> This report, The Role of Consumer Organisations to Support Consumers of Financial Services in Low and Middle Income Countries, was funded in whole or in part by CGAP ([www.cgap.org](http://www.cgap.org)). Unlike CGAP's official publications, it has not been peer reviewed or edited by CGAP, and any conclusions or viewpoints expressed are those of the authors, and they may or may not reflect the views of CGAP staff.

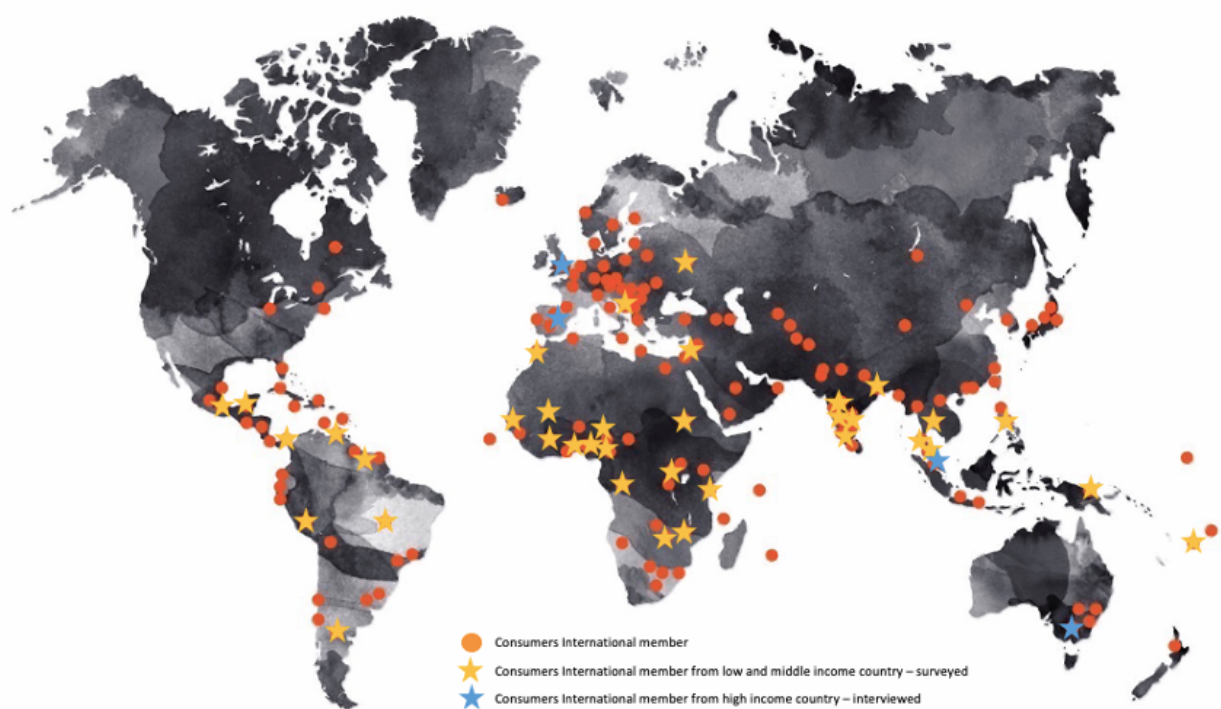
The research, conducted in May and June 2020, involved the following activities:

1. A survey of a group of Consumers International members from low and middle income countries.
2. Interviews with a select group of Consumers International members from low and middle income countries.
3. Interviews with four Consumers International members from high income countries.
4. A virtual workshop providing more in-depth discussion with a select group of Consumers International members from the activities above.

36 members from 32 low and middle income countries responded to the online survey (out of 132 members in low and middle income countries around the world). From this group, Consumers International chose 12 member organisations in Latin America, Europe, Africa and Asia for follow-up interviews based on their level of engagement on financial consumer protection.

Consumers International also conducted interviews with four member organisations from Australia, the UK, Singapore and Spain. Consumer organisations in these countries typically have access to more resources and expertise to engage in financial consumer protection.

**Figure 1: Map of Consumers International members surveyed and interviewed for this study**



## RESEARCH FINDINGS: HOW CONSUMER ORGANISATIONS CONTRIBUTE TO GOOD FINANCIAL CONSUMER PROTECTION PRACTICES<sup>3</sup>

The following section describes the key characteristics of Consumers International members surveyed, an examination of their portfolio of work and the stakeholders with which they work. We then analyse the approaches consumer organisations use to deliver change with regard to financial services, telecommunications and data protection. Lastly, we describe the most significant challenges consumers of financial services are facing in low and middle income countries.

### KEY CHARACTERISTICS OF CONSUMERS INTERNATIONAL MEMBERS IN LOW AND MIDDLE INCOME COUNTRIES

Depending on the national legislative history and background to the civil society movement in the country, Consumers International members have different levels of establishment. Groups such as the Instituto Brasileiro de Defesa do Consumidor (IDEC) were founded 30 years ago, whereas Laban Konsumers (LKI) in the Philippines was established only four years ago at the request of government.

Member organisations in low and middle income countries tend to be small in size. A consumer advocacy group in the UK or Australia might have upwards of 200 staff and a large network of volunteers, whereas consumer advocacy groups in low and middle income countries typically have a staff size between 20 and 40, with a reliance on volunteers. As a result, the latter tend to have a small advocacy team working across a broad range of consumer issues beyond financial protection. Despite their small size and capacity constraints, many participate in a range of activities such as advocacy, monitoring, policy dialogue/legal reform, education and campaigning.

To extend their reach to all consumers, these organisations create broad networks and grassroots connections with strong ties to local communities. For example, the Rwanda Consumers Rights Protection Organization (ADECOR) has established 20 district-level committees in four provinces, where consumers can raise issues with ADECOR directly. Similarly, the Consumer Council of Zimbabwe (CCZ), runs 366 Consumer Action Clubs nationwide, which provide educational courses to a range of consumers.

These organisations are often funded from consumer contributions. In our survey, the majority of members shared that funding specifically for financial services activities is derived directly from consumer contributions (70%), fees paid for consumer advocacy services (67%) and government grants (60%). Funding sources may be inconsistent. For example, a 2013 Consumers International study of 75 members in 60 low, middle and high income countries highlighted that while governments in low income countries have legal obligations to fund consumer advocacy (50%), fewer actually provided funding (33%).<sup>4</sup>

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<sup>3</sup> We take note of World Bank's Good Practices for Financial Consumer Protection and related in country diagnostics which recommend that countries work to strengthen consumer organisations and collaborate with them on an array of financial consumer protection issues; including market conduct monitoring and financial educational programmes. Through this report we seek to highlight that consumer organisations are increasingly performing financial regulatory functions in their respective countries. Good Practices for Financial Consumer Protection, World Bank Group, 2017.

<sup>4</sup> The State of Consumer Protection Around the World, Consumers International, 2013.



As mentioned, members in low and middle income countries work on a range of consumer issues. The 2013 Consumers International survey found that financial services, food security, energy, household goods and information and communication technologies (ICTs) were the top five priority issues, with financial services being the most important issue. For this 2020 research study, members were specifically asked about three consumer issue areas. 81% indicated that they work on financial sector issues and those organisations tend to also work on telecommunications.

**Figure 2: Which of the following topics does your organisation work on? – 36 responses**

Which of the following topics does your organisation work on? (Tick all that apply)	
1. Telecommunications	83%
2. Financial Services	81%
3. Data Protection	58%
4. Other (e.g. insurance, financial education)	47%

When we asked how consumer advocates overcome their resource constraints, a majority of consumer organisations work with academics and experts to ensure they operate with up-to-date knowledge. A majority work with volunteers to increase their range. Over half work with other non-governmental organisations (NGOs) on a case by case basis although fewer are part of organised coalitions, which could provide an opportunity for future development. The majority of members surveyed do not have the resources to work with more than three stakeholder types.

Over half of the respondents stated they actively work with providers of financial services, which highlights the need to work directly with corporations and other bodies on behalf of consumers. While consumer organisations would seemingly have similar objectives to legal aid organisations, only 19% signalled they have a regular collaboration. This may indicate that many do not have the time and capacity to engage with legal structures in their respective countries.

**Figure 3: Do you regularly work with any of the following groups in relation to financial services? – 36 responses**

Do you regularly work with any of the following groups in relation to financial services? (Tick all that apply)	
1. Academics/Experts	78%
2. Volunteers	73%
3. Other NGOs on an ad hoc basis	57%
4. Regulators	54%
5. Financial Service Providers	51%
6. Other NGOs as part of a formal national coalition	43%
7. Legal aid organisations or Universities with a legal clinic	19%

## KEY APPROACHES UTILISED BY CONSUMERS INTERNATIONAL MEMBERS IN LOW AND MIDDLE INCOME COUNTRIES

Consumers International members surveyed for this research were asked to share the tactics and strategies they use to deliver change for consumers with regard to financial services.

Members consider consumer education and information/awareness as the most important approach to help consumers of financial services. In countries without financial consumer protection law or policy, or limited market conduct monitoring, consumer organisations may place greater emphasis on the need for consumers to be more aware of sharp practices in the financial services industry.

**Figure 4: What approaches do you use to deliver change? – 35 responses**

Percentage of members ranking approach “most important”					
Financial Services		Telecommunications		Data Protection	
1. Consumer education (formal/informal)	68	1. Dialogue/advocacy/ influencing with companies	57	1. Information and awareness (such as publications, radio, social media, meetings)	30
2. Information and awareness (such as publications, radio, social media, meetings)	65	2. Dialogue/advocacy/ influencing with policy-makers.	54	2. Dialogue/advocacy/ influencing with policy-makers.	25
3. Dialogue/advocacy/ influencing with policy-makers	56	3. Complaints handling	50	3. Complaints handling	14
4. Dialogue/advocacy/ influencing with companies.	40	4. Your own research into consumer experiences (e.g. through consumer surveys)	50	4. Consumer education (formal/informal)	13
5. Your own research into consumer experiences (e.g. through consumer surveys)	35	5. Your own analysis of official data	45	5. Your own research into consumer experiences (e.g. through consumer surveys)	13
6. Debt counselling	32	6. Information and awareness (such as publications, radio, social media, meetings)	43	6. Developing pilot approaches / products	12
7. Your own analysis of official data	30	7. Consumer education (formal/informal)	43	7. Legal aid/public interest litigation	10
8. Complaints handling	29	8. Your own research into products or services (e.g. mystery shopping, analysis of terms, costs and fees)	33	8. Dialogue /advocacy/ influencing with companies	7
9. Your own research into products or services (e.g. mystery shopping, analysis of terms, costs and fees)	25	9. Legal aid public interest litigation	21	9. Debt counselling	6
10. Legal aid/public interest litigation	23	10. Developing pilot approaches/products	16	10. Your own analysis of official data	6
11. Developing pilot approaches/products	4	11. Debt counselling	9	11. Your own research into products or services (e.g. mystery shopping, analysis of terms, costs and fees)	5

For the purposes of comparison, we asked members to comment on their practices in the telecommunications and data protection sectors. Consumer advocacy activities in the telecommunications sector tend to be quite different, with a focus on dialogue with regulators and companies and also on complaints handling. This reflects a more established sector, stronger regulatory

bodies and greater consumer familiarity with telecommunications products in low and middle income countries. It is notable that in data protection, consumer advocates are also involved in developing and testing pilot approaches to new products and services.

Members consider dialogue with companies the most important approach in the telecommunications sector. It is also considered a very valuable approach in the financial services sector, as in the majority of low and middle income countries where there is a financial ombudsman, consumers organisations are obliged to go to the financial institution with a complaint before taking it to the regulator<sup>5</sup>. Other notable reasons may be that consumer advocates are now actively taking market research findings directly to industry for a quicker and more effective outcome for consumers.

**Figure 5: Engagement of consumer advocacy in formal consumer protection and financial services structures – 35 responses**

		Consumer Protection	Financial Services
Are there official structures for consumer representation in policy-making in your country? (for example: regular dialogues with regulators or parliamentary committees?)	Yes	87%	76%
	No	13%	21%
	Don't Know	0%	3%
Are you involved in these structures?	Yes	83%	65%
	No	17%	35%
	Don't Know	0%	0%
Is participation funded for consumer advocacy groups?	Yes	11%	6%
	No	81%	86%
	Don't Know	8%	8%
How often do these structures meet?	Every 1-4 months	29%	31%
	Every 5-9 months	6%	6%
	Every 10-12 months	6%	4%
	Only as required	59%	59%
In your opinion how influential are these structures (rank 1-5 with 1 being very influential)	1	26%	26%
	2	26%	20%
	3	23%	26%
	4	6%	9%
	5	20%	20%

Across all areas of their work, members emphasised the importance of working directly with law and policy-makers to deliver change for consumers. We therefore explored the strength and nature of this relationship. A majority of members surveyed participate in official consultations with both consumer protection and financial services policy-makers. When these meetings take place, they are felt to be of great value. However, the combined survey and interview results show these meetings are typically on an 'ad hoc', invitation basis rather than a statutory obligation on the part of law and policy-makers to engage with consumer organisations. 59% of respondents indicated that they meet only as required, compared to 31% who indicated that they meet every 1-4 months. In analysis of our survey responses, in cases

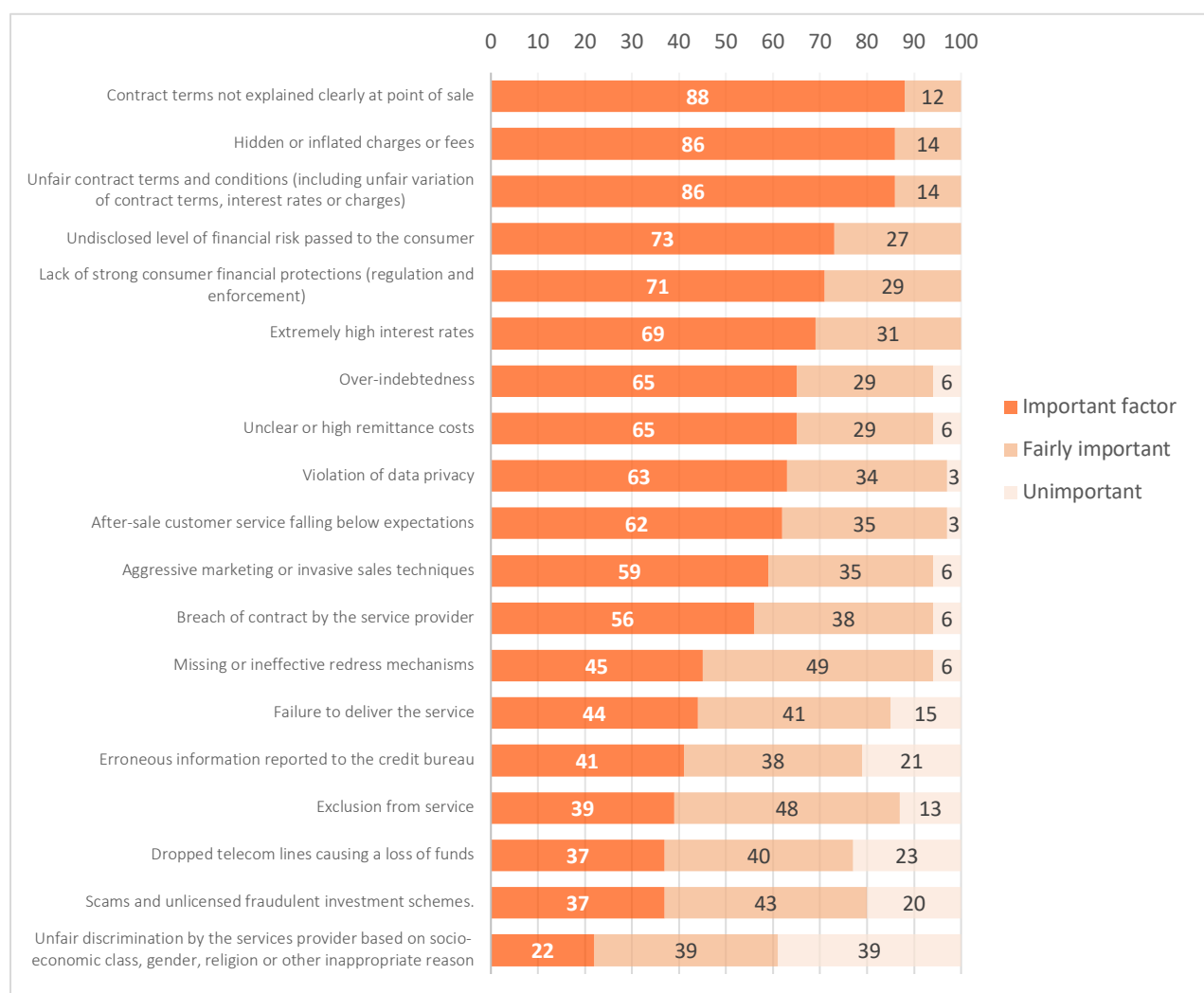
<sup>5</sup> See International Network of Financial Services Ombudsman Schemes: <http://www.networkfso.org/for-consumers.html>

where regular connections are established between consumer advocates and regulatory bodies, consumer advocates perceive official structures as more influential.

## CHALLENGES EXPERIENCED BY CONSUMERS OF FINANCIAL SERVICES IN LOW AND MIDDLE INCOME COUNTRIES

Consumers International members were provided with a list of potential challenges faced by consumers in low and middle income countries related to financial products and services, drawn from prior research and agreed with CGAP experts prior to the research. From this list, survey respondents indicated the most significant challenges facing financial consumers in their countries.

**Figure 6: What are the most significant challenges facing consumers of financial services in your country? (Tick only one option per row) – 36 responses**



Members consider contract terms not explained at point of sale, hidden or inflated charges or fees and unfair contract terms and conditions the most significant challenges facing consumers. We note this is largely expected as the financial products that are likely to pose the most risk are those with no legal mandate to communicate terms in a clear and transparent manner. This may cover products in payment services or consumer credit and insurance for example. The advent of digital financial services has accelerated and deepened this risk as terms and conditions are now delivered online, with limited information on effective recourse mechanisms and agent liability.<sup>6</sup> Many consumers may adopt these services without a full understanding.

Members also consider violations of data privacy as serious challenges for consumers. This may also relate to the growth of digital financial services products in low and middle income countries. For example, mobile money services in low and middle income countries are expanding the 'digital data trails' of consumers. Data is collected through call records, airtime top-ups and mobile transactions. In many low and middle income countries data protection frameworks are underdeveloped<sup>7</sup>.

Over-indebtedness was also considered a key challenge by members. Despite the growth of digital lending services and payday loan apps, it may be the case that financial institutions do not have sufficient tools for debt counselling. For example, in Brazil 66%<sup>8</sup> of the economically active population are over-indebted. While we would expect this challenge to be ranked as a higher concern, the moratorium on debt collections that many governments have legislated for during the COVID-19 pandemic may have eased this pressure. As part of this survey, 63% of members were active in calling for the suspension of loan repayments during the COVID-19 pandemic.

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<sup>6</sup> Digital Financial Services, World Bank Group, 2020.

<sup>7</sup> Opportunities and Risks in Digital Financial Services: Protecting Consumer Data and Privacy, Responsible Finance Forum, 2017

<sup>8</sup> Interview, IDEC, June 4 2020.

## ADVOCACY STRATEGIES USED BY CONSUMER ORGANISATIONS

Through the survey and subsequent interviews, members were asked to share strategies for effective support to consumers of financial products and services. The following sections describe each strategy in turn, with a case study example.

- Complaints handling and facilitating dispute resolution on behalf of consumers
- Providing consumer debt counselling
- Market research: monitoring provider products/services quality and understanding consumer perceptions and behaviour
- Awareness-raising campaigns and financial education
- Representing consumer voice in the legislative and policy-making process
- Public interest litigation to enforce consumer rights

### COMPLAINTS HANDLING AND FACILITATING DISPUTE RESOLUTION ON BEHALF OF CONSUMERS

Complaints handling is an important tool that allows Consumers International members to engage directly with consumers. Consumer organisations provide multiple channels for consumers to reach out to them with regard to consumer protection problems, including via email, phone/text and in some instances WhatsApp. Members either counsel consumers in person, or they may refer them to a government sponsored dispute resolution mechanism. Members may also explain to the consumer how to use the existing government dispute resolution mechanism, or they may prepare and submit the complaint on behalf of the consumer to the government agency if they have a direct line to the complaints body.

#### The Consumer Advocacy Experience

Even in cases where there is an existing central bank unit to handle consumer complaints, or even a dedicated financial dispute resolution mechanism - such as a financial ombudsman - consumer organisations may still need to educate the consumer and guide them through the process. A representative from CCZ noted that there is a disconnect between knowing and doing on the part of consumers. They added that the complaints process at the Reserve Bank of Zimbabwe is not clear for the average consumer and many rural consumers are unaware that this process exists.

A consumer organisation will likely have a direct route to the complaints process given their experience in the marketplace. For example, LKI receives consumer complaints via email, text, Facebook, phone and walk-in. LKI also has a direct line to the Director of Compliance at the Banko Sentral Pilipinas to channel consumer complaints more efficiently for immediate action.

At the time of writing, during the COVID-19 pandemic, the level of complaints and consumers seeking support has increased significantly. The Asociación Peruana de Consumidores y Usuarios (ASPEC) commented that they currently receive and respond to WhatsApp messages 24 hours a day.

Consumer advocates in low and middle income countries are experimenting where possible with technology solutions to support engagement with consumers. For example, the Fédération des Associations de Consommateurs de Côte d'Ivoire (FAC) created an application 'le Consommateur Eclairé' to sort and forward complaints to the appropriate regulator. At the time of writing, funds were insufficient to manage the service and it is no longer operational.

## CASE STUDY: COMPLAINTS HANDLING IN PERU

**Consumer Advocacy Organisation:** The Asociación Peruana de Consumidores y Usuarios (ASPEC)

**Challenge:**

- Consumers struggle with current formal redress mechanisms.

**Approach:**

- ASPEC assists consumers to file their complaints with The National Institute for the Defence of Free Competition and the Protection of Intellectual Property (INDECOPI) which has a dispute resolution mandate.
- ASPEC offers specialised guidance and prepares a letter representing the consumer and his/her complaint to the company in question.
- When a consumer is successful, ASPEC can receive up to 50% of the sanctions awarded to the individual through the INDECOPI complaints process.

**Result:**

- +1 million people reached by ASPEC.
- Continued support during the pandemic.

## PROVIDING CONSUMER DEBT COUNSELLING

This tool is used by consumer advocates to assist consumers who are unable to repay their debt obligations. In many developing countries, there are no state sponsored debt relief mechanisms for individual consumers and only a few countries offer state sponsored debt counselling. Where there are debt relief structures in place, filing for bankruptcy can be very expensive. For example, in Russia, the filing cost for a personal bankruptcy procedure costs 100,000 Russian Rubles (RUB) - approximately \$1,300 USD<sup>9</sup> - whereas the GDP per capita in Russia is approximately \$11,300 USD. It is unlikely that a consumer who is already in debt difficulty would be able to spend 10% of their annual earnings on bankruptcy proceedings.<sup>10</sup> Debt restructuring is often based on the voluntary cooperation of all one's creditors which presents a significant problem as the consumer will typically owe money to multiple sources.

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<sup>9</sup> Interview, KONFOP, June 2020.

<sup>10</sup> See World Bank GDP per capita country data available online at <https://data.worldbank.org/indicator/NY.GDP.PCAP.CD?locations=RU>

In other countries, non-payment of debt is treated as a criminal matter, which may result in the incarceration of a consumer who defaults, as is the case in Egypt, Dubai, Sierra Leone and Tunisia. In some countries, civil procedure allows for creditors to incarcerate defaulting debtors if they pay for the related costs of feeding the debtor while in jail, as is the case in Morocco<sup>11</sup> and Uganda.<sup>12</sup>

## The Consumer Advocacy Experience

The Foundation for Consumers (FFC) in Thailand offers debt counselling, assisting anywhere from 10-20 consumers per day, working with them to develop a debt prioritisation plan with a high success rate. FFC will also provide legal aid to consumers being sued by creditors for unpaid loans and has published a short informative article for consumers entitled 'What to do when Receiving a Subpoena due to a Default'<sup>13</sup>.

Many consumer organisations highlighted the way in which new digital services enabled consumers to get into debt far more easily and quickly than in the past. IDEC is currently assisting a consumer who had incurred so much debt that servicing his loan obligations required 120% of his income. IDEC has produced an awareness-raising video on the story<sup>14</sup> and supported him in all debt renegotiations. He is now no longer over-indebted. While this is an extreme example, now that loans are available from digital providers, who do not always perform stringent credit risk assessments, consumers are rapidly able to accumulate multiple debts. Digital lenders may simply price the risk of default into their loans and/or have unique debt collection tools at their disposition. For example, a representative of LKI stated<sup>15</sup> that consumers are being provided loans to purchase motorcycles with which to offer motorcycle/taxi services, but if a consumer defaults, the lender will use an app to shut off the motorcycle.

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<sup>11</sup> Interview, FNAC, June 3 2020.

<sup>12</sup> Email from Ugandan high court judge, Hon. Flavian Zeija on June 15, 2020 confirmed that the law is still in effect and creditors must pay the equivalent of 0.50 USD per day to incarcerate a creditor who faces a 6 month sentence (per default, therefore this sentence could extend years if the consumer has multiple debts.

<sup>13</sup> Interview, FFC, May 27 2020.

<sup>14</sup> Interview IDEC, June 4 2020. See the story presented here: <https://www.youtube.com/watch?v=e-YFvzub5RQ>

<sup>15</sup> Interview, LKI, May 27 2020.



## CASE STUDY: DEBT COUNSELLING IN MOROCCO

**Consumer Advocacy Organisation:** Fédération Nationale des Associations du Consommateur du Maroc (FNAC)

**Challenge:**

- There are rising levels of over-indebtedness amongst consumers and no formal debt relief nor restructuring mechanisms available to consumers.
- Like most developing countries, creditors' rights in Morocco are quite strong allowing for collaterals to be seized, salaries to be attached and in theory, debtor incarceration.

**Approach:**

- FNAC works with debt-stressed consumers, engaging with creditors on their behalf to find restructuring solutions.
- Each complaint takes 30 days to process.

**Result:**

- FNAC had helped 129 consumers in 2020 by the end of this research.

## MARKET RESEARCH: MONITORING PROVIDER PRODUCTS/SERVICES QUALITY AND UNDERSTANDING CONSUMER PERCEPTIONS AND BEHAVIOUR

Market research is used by Consumers International members to better understand products and services in the marketplace and how their use impacts consumers. Alternatively, it can be used to understand the consumer perspective or consumer behaviours. Where appropriate, this research may be used to develop and support an advocacy position which the consumer organisation takes to policy-makers or the marketplace.

Consumer organisations have long used market research, including mystery shopping and comparative product testing as advocacy tools. Comparative product testing results can be published in the form of subscriptions to consumer magazines, such as the 'Smart Payer' magazine in Thailand. These products can be a viable source of revenue for consumer organisations in some countries.

To deliver more immediate and effective change, market research can also be sold directly to industry. For example, 40% of the members surveyed indicated that they use dialogue with companies as a key advocacy approach in financial services. As market research becomes more sophisticated and more companies are present in the market locally, it is advantageous for consumer organisations to go directly to industry for faster responses to consumer issues.

## The Consumer Advocacy Experience

Comparative product testing for the financial services market is conducted via an analysis of published terms and conditions for products and/or mystery shopping to assess pricing and perceived risks. A broad range of respondents raised current examples of these activities such as CCZ in Zimbabwe, ASPEC in Peru and the International Confederation of Consumer Societies (KONFOP) in Russia. CCZ indicated that it is exploring research in the area of telecommunications quality of service, including initiation of discussions with telecommunications engineers as well as engaging with the Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ) about its requirements of the sector and the data it collects.

### CASE STUDY: MYSTERY SHOPPING IN RUSSIA

**Consumer Advocacy Organisation:** International Confederation of Consumer Societies (KONFOP)

#### Challenge:

- Some banks may not be providing information to consumers on applicable costs, terms, or risks prior to signing a contract, which limits a consumer's ability to compare products/services.
- Some banks may be bundling health and life insurance products with consumer home loan mortgages, misleading consumers that these insurance products are mandatory when they are not in violation of existing regulations.
- Some banks may not be informing consumers of the risks surrounding investment insurance products.

#### Approach:

- Since 2013 KONFOP has conducted 13 waves of mystery shopping in 20 regions in Russia to monitor how financial institutions treat consumers.
- KONFOP organised a round table discussion with the Ministry of Finance, Rospotrebnadzor (consumer protection regulator), the Bank of Russia and financial services providers to disseminate the results of their mystery shopping.

#### Results:

- KONFOP mystery shopping on loans indicates (June-November 2019):
  - almost 60% of banks do not provide consumers with draft contracts of their loans.
  - only 1 bank out of 19 informed consumers that health and life insurance are not mandatory for mortgage borrowers.
- KONFOP mystery shopping on investment insurance indicates (Dec 2018-May 2019):
  - most banks do not inform consumers about major risks of investment insurance (it is not covered by the state deposit insurance programme; there are no guarantees of profit; consumers will not get all their money back if they terminate the contract before the term ends).
- The Bank of Russia issued a standard on investment insurance products. KONFOP is continuing with follow-up research which was published in late 2020.

Consumer organisations also use direct surveys to understand consumer behaviours and attitudes and better represent the voice of the consumer. For example, the Consumer Unity and Trust Society (CUTS

International) in India recently conducted a study to understand consumer perceptions and behaviours in relation to data privacy. Consumer attitudes and behaviours related to securing personal data is particularly relevant for India as it develops new data protection legislation, and also in light of the judgment of the Indian Supreme Court ruling that establishes a 'right to privacy' as a fundamental right.

## CASE STUDY: CONSUMER SURVEY ON DATA PRIVACY ATTITUDES IN INDIA

**Consumer Advocacy Organisation:** Consumer Unity and Trust Society (CUTS International)

### Challenge:

- In 2018, the Government of India formed an expert committee to develop the draft Personal Data Protection Bill.
- CUTS note that more women, young people, and rural people are using digital technologies. The Reserve Bank of India reports the number of digital transactions grew 129% between 2017-2019.
- There is limited protection for consumer data and also limited understanding of the perceptions, awareness/capacity and expectations of consumers with regard to data privacy.

### Approach:

- CUTS conducted a data privacy survey of 2,400 consumers in Uttar Pradesh, Punjab, Assam, West Bengal, Andhra Pradesh and Maharashtra. It revealed that consumers are generally uncomfortable sharing their private data.
- Consumers are least comfortable sharing financial details, browsing and communication history and location data, but they generally will share this private data with the services providers.
- Consumers expect that there is a purpose limitation on the use of their data.

### Results:

- The survey findings were shared with the Government of India, and CUTS provided inputs on both the Draft Personal Data Protection bills of 2018 and 2019.
- Various media agencies reported on the survey findings to highlight how data privacy affects consumers of all socio-economic backgrounds.
- Given that the survey revealed consumer capacity constraints, CUTS also conducted workshops for consumers regarding how to better use data protection tools.

## CONSUMER AWARENESS-RAISING AND EDUCATION

This consumer advocacy approach is used by Consumers International members to inform consumers of their rights or that their rights are being infringed upon. Specifically, financial education and awareness tools are pursued when the legal and regulatory framework has gaps, or the capacity of the regulator for financial consumer protection is weak. This may result in consumer advocacy campaigns bringing these issues into the public space to ensure the consumer voice is represented.

### The Consumer Advocacy Experience

The majority of members surveyed consider awareness-raising campaigns as the most effective financial consumer protection advocacy tool. A range of members cited writing articles for magazines, commissioning publications by academics and disseminating information via social networks, TV and radio as key activities. ADECOR for example, has reached over 2 million consumers through consistent media appearances<sup>16</sup>.

Multiple consumer organisations also referenced a strong need for financial consumer education due to low levels of financial literacy in their respective countries. Select consumer advocates are able to focus their efforts to specific groups. For example, CUTS, CCZ, IDEC and the Consumer Council of Fiji (CCF) have utilised their extensive ties to grassroots structures to help target their financial education efforts on women and vulnerable groups.

Several members also discussed their past participation in government-led, multi-stakeholder initiatives on financial education. However, some of these members cited challenges such as continuity and sustainability.

Financial education research suggests that in order to be effective, initiatives should be experiential as well as take advantage of teachable moments for consumers<sup>17</sup>. For example, young people may be interested to learn about terms and conditions of buying with an instalment contract when they need a new computer for school. The close connection with consumers provides an opportunity for consumer advocates to create more examples of truly experiential learning.

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<sup>16</sup> Interview, ADECOR, July 2020.

<sup>17</sup> For example: Lusardi, AnnaMaria, *Financial Literacy: An Essential Tool for Informed Consumer Choice?* Dartmouth College, 2008.

## CASE STUDY: A FOCUS ON INCLUSIVITY IN ZIMBABWE, INDIA, FIJI AND BRAZIL

### Challenge:

- Women and vulnerable populations are often unequally impacted by financial exclusion and over-indebtedness.

### Consumer Council of Zimbabwe (CCZ):

- CCZ enacts financial education programmes at the community level through 366 Consumer Action Clubs countrywide; each club has an average of 15 members and 90% are women. This includes programmes on household budgeting, small business account keeping and financial literacy courses.
- CCZ estimates that 4,000 women have been successfully reached through their Consumer Action Clubs.

### Consumer Unity and Trust Society (CUTS International):

- CUTS is heavily engaged in financial literacy activities with rural women. Their awareness/capacity building events at village level have reached approximately 140,000 people in roughly 1,400 villages.
- CUTS estimates that they have supported 84,000 women with their financial literacy activities.

### The Consumer Council of Fiji (CCF):

- The CCF has recently made efforts to reach more women through their financial services activities. They provide financial advisory services to women through the Debt Management and Consumer Advisory Services.

### Instituto Brasileiro de Defesa do Consumidor (IDEC):

- IDEC designed a financial education programme for vulnerable women, lesbian, gay, bisexual and transgender (LGBT) persons, and other poor/vulnerable consumers in São Paulo, to deliver after the COVID-19 pandemic.

## REPRESENTING THE CONSUMER VOICE IN THE LEGISLATIVE AND POLICY-MAKING PROCESS

This consumer advocacy approach can take various forms. Typically, it involves engaging in dialogue and presenting the consumer perspective to government and regulatory bodies, potentially through regular committees or meetings of law-making bodies where consumer organisations may be invited to participate. In addition, consumer organisations may submit information and data to law and policy-makers of their own volition.

The majority of the interviewed Consumers International members advocate with law and policy-makers on financial consumer protection issues. These consultations are not always mandated by law, and this may result in consumer organisations lacking any formal or structured manner to engage.

## The Consumer Advocacy Experience

Input to policy development is possibly one of the richest areas of consumer advocacy experience and focus. The majority of consumer advocates surveyed and interviewed around the world shared a variety of examples and ongoing efforts. These are typically drawn from, and also inform, other strategies used to protect consumers of financial services in the country. For example, consumer complaints trends may inspire the need for new policies, and the new policy may be used to inform consumer education programming.

### CASE STUDY: TRACKING LEGISLATION IN BRAZIL

**Consumer Advocacy Organisation:** Instituto Brasileiro de Defesa do Consumidor (IDEC)

**Challenge:**

- 66% of the economically active consumers in Brazil are over-indebted, and over-indebtedness has a disproportionate impact on Brazilian women.

**Approach:**

- The Bank of Brazil does not have a consumer protection mandate or connections with local consumer advocates.
- Instead IDEC has developed permanent relationships with government law-makers. IDEC are invited to Parliamentary hearings to provide technical context on consumer issues.
- IDEC employs three lawyers in Brasilia to follow all pending bills in Parliament and provide materials to Parliament to ensure the consumer voice is represented in all new consumer protection law.

**Result:**

- Presently, IDEC is advocating for Bill No. 3515 - if passed, the law will mandate that financial institutions provide fair restructuring of loans to consumers who are over-indebted.

Members have helped drive new consumer protection legislation overall and in financial services. For example, CCZ's work in advocacy, including drafting the legislative act, resulted in the passage of the 2019 Consumer Protection Act. In Thailand, FFC advocated for the Bank of Thailand to regulate financial market conduct, which became effective in 2018. The Federation of Malaysian Consumers Associations (FOMCA) contributed to the passage of Malaysian National Financial Literacy Strategy.

Consumer advocacy enables broader reach and consultation. In Rwanda, ADECOR supported the drafted financial consumer protection law of January 2020, which was expected to take effect in July or August 2020 at the time of this research. ADECOR established district-level committees whereby consumer issues can be heard in the capital. In turn, these grassroots structures can be used to disseminate information from national government to consumers.

Members highlighted the continued need for better consumer protection and the ongoing engagement of consumer advocates in its development. This is happening in both the Philippines and in India, where

consumer organisations are actively proposing financial consumer protection legislation.

## PUBLIC INTEREST LITIGATION TO ENFORCE CONSUMER RIGHTS

When the situation is viewed as particularly dire such that other advocacy efforts fail, consumer organisations will seek redress and rulings in the courts. Consumer advocates take legal action through the filing of lawsuits; either on the behalf of individual consumers with representative cases, or on the behalf of several consumers where there has been similar, collective harm. Consumer organisations are also likely to litigate when the issue impacts a large number of consumers, or the financial consumer protection issue is blatantly illegal, or both.

### The Consumer Advocacy Experience

Public interest litigation is a strong tool to effect social change as seen recently in Germany<sup>18</sup> and Chile<sup>19</sup>. India has recently overhauled its 2019 Consumer Protection Act, pursuant to which similarly harmed consumers can sue collectively. Once fully operational, this law will be a powerful advocacy tool for consumer organisations.

#### CASE STUDY: PUBLIC INTEREST LITIGATION IN LEBANON

**Consumer Advocacy Organisation:** Consumers Lebanon

**Challenge:**

- Several Lebanese banks sequestered consumers' dollar accounts, refusing to allow more than \$200 USD to be withdrawn per week and also requiring payment to be accepted in the much-devalued Lebanese pound.

**Approach:**

- In February of 2020, Consumers Lebanon brought legal action against the Lebanese Bankers' Association and three of the largest banks in Lebanon, and it continues its advocacy through the media, joining forces with other consumer movements in the country.
- Consumers Lebanon has also submitted a letter on behalf of consumers to the International Monetary Fund (IMF).

**Result:**

- Litigation pending at the time of this research.

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<sup>18</sup> See Volkswagen to compensate consumers in Germany affected by Dieselgate online at:

<https://www.beuc.eu/publications/settlement-reached-volkswagen-compensate-consumers-germany-affected-dieselgate/html>

<sup>19</sup> See DieselGate outcome in Chile online at: <https://www.biobiochile.cl/noticias/economia/tu-bolsillo/2020/02/03/dieselgate-en-chile-acuerdo-entregara-casi-400-mil-a-cada-afectado-y-reparacion-de-vehiculo.shtml>

# CHALLENGES FOR CONSUMER ORGANISATIONS TO SUPPORT CONSUMERS OF FINANCIAL SERVICES

As not-for-profit organisations in low and middle income countries, consumer organisations have particular challenges to establish a presence, build resilience and operate in times of crisis.

## ESTABLISHING PRESENCE

- Many members work across multiple government agencies with divided mandates and develop legislation over time that can be subject to political change.
- Lack of visibility – consumer advocacy does not have the high-profile presence of environmental or health NGOs at present, although it still plays an essential role for national and international economies.

## BUILDING RESILIENCE

- Many members rely on insufficient funding from government sources to service consumer demand, particularly heightened during the COVID-19 pandemic.
- Lack of expertise – small advocacy teams are required to cover multiple evolving areas of expertise, for example data protection and quality of service.

## CRISIS RESPONSE

- Many members operate under political unrest and economic collapse. For example, Consumers International members in Libya, Lebanon, Sudan, Yemen and Zimbabwe continue to advocate for financial consumers even during crisis.
- During the COVID-19 pandemic all members have experienced and reported significant increases in consumer financial vulnerability, complaints and issues.



# OPPORTUNITIES AND RECOMMENDATIONS FOR FINANCIAL CONSUMER PROTECTION STAKEHOLDERS

We propose a series of opportunities and recommendations for consumer organisations, governments and policy-makers, bilateral/multilateral organisations and foundations working in the financial services space, to strengthen their engagement with consumers and help build a safe, fair and sustainable financial services marketplace.

## FOR CONSUMER ORGANISATIONS

We suggest that consumer organisations consider:

1. establishing regional and international communities of practice whereby consumer organisations can share expertise on technical subjects; and/or jointly formulate advocacy strategies, including public interest litigation strategies.
2. establishing the formation of advocacy blocs that also include other civil society organisations with overlapping sustainable finance and development objectives. Examples include social money movements such as Banco Palmas in Brazil; complementary currencies such as Grass Roots Economics Kenya; mutual credit organisations such as Sardex in Italy; and sustainable environmental finance initiatives such as the sampahs or garbage banks in Indonesia.
3. developing the use of apps or software such as chatbots, that can aid in managing, triaging and prioritisation of consumer complaints, as well as providing data analytics that can aid in reporting to a regulatory body. These apps or software can also be developed in collaboration with other regional consumer organisations in an effort to cost share.

## FOR GOVERNMENT, LAW/POLICY-MAKERS AND REGULATORS

We suggest that government law/policy-makers and regulators consider:

1. allocating funds to consumer organisations to engage in market conduct surveillance and related consumer educational activities such as facilitating complaints handling – including to educate consumers about how to use an existing dispute resolution body; to conduct mystery shopping as well as consumer surveys; and/or to provide awareness-raising and financial education programmes for consumers.
2. establishing a financial services consumer protection act and supporting regulations, if not already enacted.
3. establishing an independent financial services dispute resolution body, such as a financial ombudsman, mediator or arbiter, where there is no such mechanism available to consumers. Also considering the inclusion of consumer representation in the governance structure of that dispute resolution body, as is the case with AFCA Australia.

## FOR BILATERAL AND MULTILATERAL ORGANISATIONS AND FOUNDATIONS

We recommend that bilateral and multilateral organisations and foundations consider:

1. engaging in consultations with consumer organisations when conducting country diagnostics, such as the World Bank Financial Consumer Protection diagnostics.
2. requiring regulators to implement recommendations resulting from consumer protection diagnostics, or policy actions tied to loan agreements that reference collaborations/consultations with civil society consumer organisations.
3. seconding professional staff with technical expertise to consumer organisations to work on digital financial services consumer protection issues, such as data privacy, quality of service and cyber security.

## LOOKING FORWARD: OPPORTUNITIES TO SHAPE FINANCIAL SERVICES FOR CONSUMERS OF THE FUTURE

Consumer organisations have a crucial role to play in ensuring the future of financial services is built with, and for consumers in a safe, fair and sustainable marketplace. Consumer advocates can shape the future world of financial services by engaging with sustainable finance, supporting agile governance and developing relationships with new business models.

### SUSTAINABLE FINANCE

- Increasingly, companies see green finance as an opportunity to promote new business frameworks and develop new, sustainable products.
- Consumer advocacy networks can place themselves at the centre of this change, with the aim of influencing providers, governments and regulators to incorporate consumer-centred principles of sustainability/suitability into their financial services and eco-systems.
- Consumer organisations can challenge firms on greenwashing products. To drive the move to a fair greener economy, consumer organisations are well placed to provide rigorous market research on products that claim to be sustainable.

### DRIVING AGILE GOVERNANCE

- As regulation links become more global, consumer organisations can continue to identify pressure points, while at the same time identifying future consumer needs. Consumer advocates can be at the forefront of driving creative regulation models that spark innovation but also provide strong social safety nets for consumers.
- Consumer organisations can share insight with the regulators interested in developing new supervisory technology mechanisms.

### SUPPORTING THE DESIGN OF CONSUMER-CENTRED BUSINESS MODELS

- As new financial technology companies become more integrated into the financial eco-system, consumer groups need to understand how these changes impact consumers.
- Consumer advocacy can ensure that new products are designed and regulated with consumers at the centre. For example, Consumers International's work with Vodafone highlights how Trust by Design principles<sup>20</sup> can help create products that are more secure, transparent and ethical.

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<sup>20</sup> Consumer IoT Trust by Design report, Consumers International, 2019.

## FURTHER OPPORTUNITIES AND RECOMMENDATIONS

We suggest that consumer organisations consider:

- For consumer organisations structured as federations, consider assigning mentors so that consumer organisations with healthier budgets can support budget challenged consumer organisations.
- Conducting surveillance of social networks for financial fraud and organising consumer financial fraud fora to share information and cultivate relationships with the police and Interpol to better protect consumers before mass frauds occur.
- Collaborations with technical and standards setting bodies that work on digital financial services security and quality of services standards, such as the United Nations International Telecommunications Union.
- Collaborations with legal aid initiatives, law faculties and bar associations to cultivate an interest in consumer protection law initiatives in the next generation. Consider creating new initiatives in partnership with universities, such as the establishment of a consumer protection legal clinic that could be a partner to which to refer collective consumer legal actions. There are also legal clearinghouse organisations, that consumer organisations in developing countries can join for free and receive legal services from large law firms.
- The use of existing crowdfunding sites or the establishment of a similar platform that can support the consumer movement and public interest projects.
- Advocating for a regular source of government funds, either for services provided through a regular budget allocation, such as ASPEC/INDECOPI complaints, or via a third-party source of funding such as the dormant accounts Depositor Education and Awareness (DEA) Fund in India.
- Requesting foreign embassies present in low income and emerging markets to allocate discretionary funds to financial consumer protection and financial literacy projects by NGOs. For example, the United States Embassy Small Grants Program.
- The use of existing tools such as the CGAP mystery shopping guide to conduct an analysis of the various digital financial services sold to consumers. Such an analysis can also include a review of the terms and conditions of the products sold, such as standard form user agreements, as compared to the existing legal/regulatory frameworks and established good practices on issues like disclosure, suitability and data privacy.
- The use of egregious financial complaints stories to create docudramas such as IDEC's video of the over-indebted consumer whose loan obligations require 120% of his income.

We suggest that government law/policy-makers and regulators consider:

- Governments could establish legal reform committees that systematically involve consumer organisations. This approach was taken by CCZ when drafting the Consumer Protection Act for the Zimbabwe Government.
- Allocating funds to consumer organisations that offer financial complaints handling. Funding can be contributed by financial institutions and based on the percentage of industry complaints received about their products.
- The establishment of a formal mechanism and supporting legal/regulatory framework if necessary, to provide debt relief for over-indebted consumers.
- The creation of a letter of principles that addresses the main problems facing financial consumers, such as a Consumer Bill of Rights.
- The involvement of consumer organisations in the design and implementation of financial literacy programmes.
- The involvement of consumer organisations in regular fraud forums, whereby police, regulators and consumer organisations can share information on financial fraud trends and consumer organisations can create awareness-raising campaigns with this information to better prevent frauds on consumers.
- The establishment of a financial consumer protection supervisory technology unit that collaborates with consumer organisations to develop new financial consumer protection supervisory tools.

We recommend that bilateral and multilateral organisations and foundations consider:

- Consultations with consumer organisations and/or involving them in the due diligence process prior to grant issuance, or investments in financial services providers.

We recommend further research is conducted to consider:

- The specific level of complaints that consumer organisations receive on financial and digital products in order to establish whether these complaints indicate a legal/regulatory gap or an existing failure to implement laws /regulations by the regulator or consumer financial illiteracy.
- The effectiveness of regulatory consultation and if joint project work has taken place between consumer organisations and government regulators.

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# CONSUMERS INTERNATIONAL

COMING TOGETHER  
FOR CHANGE

Consumers International is the membership organisation for consumer groups around the world.

We believe in a world where everyone has access to safe and sustainable products and services. We bring together over 200 member organisations in more than 100 countries to empower and champion the rights of consumers everywhere.

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