THE CLIENT PROTECTION PATHWAY

Implementing Fair Collection Strategies

Implementation series 6

By Rula Mheisen







OUR GOALS

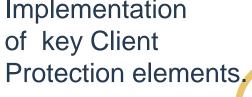
Why is it important to have fair collection practices?



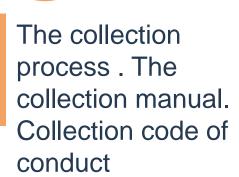
Implementation of key Client



Discuss some of the best practices.









SPEAKERS

Collection Journey... CP lens matters



Ehab NajeebHead of Retail and Microfinance Collection
Agricultural Bank of Egypt - Egypt

Collection at a certified MFI



Issam ShnoudehChief Business Officer
Tamweelcom – Jordan

WHY IS IT IMPORTANT TO HAVE FAIR COLLECTION PRACTICES?
CLIENT RELATIONSHIP MANAGEMENT

CREATE THE BALANCE



THE ROLE OF COLLECTIONS

 Providers should view collections as an essential piece of the credit cycle, not just the final step.

✓ During the collections process, institutions receive feedback on policies and activities within each sub-process of the lending cycle.



EMPHASIZING THE IMPORTANCE OF LONG-TERM CLIENT RELATIONSHIPS

Key to designing and developing efficient collections strategies. Though it is true that timely loan collections is vital to the provider's survival, achieving client repayment must never include:

Inappropriate coercion or intimidation techniques, such as physical force and humiliation.

Contact at inappropriate hours of the day.

seizure of assets that are basic to the client's daily survival.



MAINTAIN A HEALTHY BALANCE BETWEEN CLIENT PROTECTION AND COLLECTIONS

The provider must develop a culture of professional service and respect for clients. This includes:

Selecting staff with the right profile

Offering regular training opportunities.

Implementing clearly defined processes



EFFECT ON THE CLIENT AND THE INSTITUTION





WHY IS THERE DELINQUENCY IN INSTITUTIONS?

Promotion

- The product does not **meet needs**.
- Target Audience is **not well defined**.
- Use of the loan.
- Lack of training.

Evaluation

- No cash-flow based analysis
- Loan amounts that exceed clients' capacity.
- No clear policies for renewal.
- Lack of riskmanagement tools.

Approval

- Decisions are influenced by pressure to meet **targets**.
- Decisions based on collaterals –
 excessive guarantee requirements
- Lack of objective credit analysis

Disbursement

- Failure to conduct objective analysis.
- clients lack motivation to pay on time.
- Few alternative payment channels
- delays in disbursement

CP standards solution for each area

Product design Transparency Prevention of over indebtedness

Audit and Governance

Prevention of over indebtedness

Transparency Product design



THE COLLECTIONS PROCESS

Set of coordinated, appropriate, and **timely activities** aimed at full collection of loans from clients. The process is intended to **convert the receivables into liquid assets** as quickly and efficiently as possible, while at the same time maintaining the **goodwill of the client** in case of future transactions

Interaction

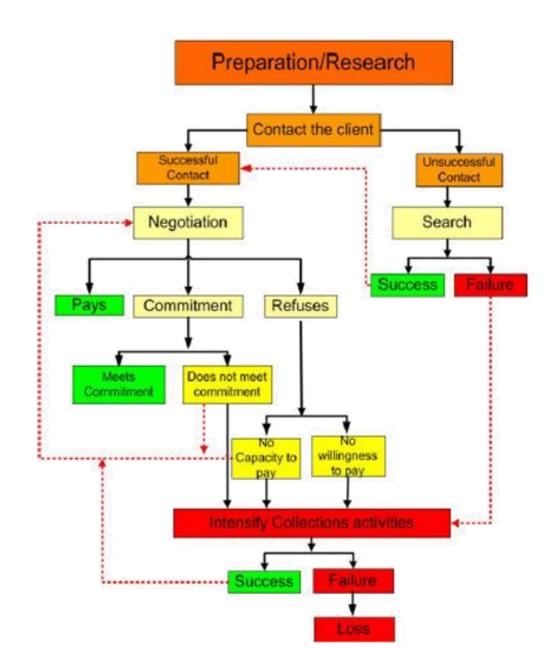
Careful analysis

Frequent contact

Offer alternatives

Record activities

EXAMPLE OF GOOD PRACTICE OF A COLLECTION PROCESS?



COMMON ERRORS

Tendency to restructure, refinance, or disburse a new loan to repay a past due loan without the proper analysis and monitoring of the client's current situation Tendency to seize goods from the business or home as a means to collect on the loan.

Tendency to be subjective

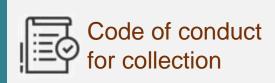


STRENGTHENING CLIENT PROTECTION PUT IT IN THE POLICY

SPECIFY ACCEPTABLE AND UNACCEPTABLE BEHAVIOR



THE COLLECTIONS MANUAL





















CODE OF CONDUCT FOR COLLECTION

The collection policy/ manual should clearly define examples of inappropriate debt collection practices

Offensive language and threats

- Credit staff uses offensive or abusive language.
- Collections agents threaten clients or harass them at work, home, or their places of worship.

Unethical seizure of property

- Collections agents enter a client's home and/or seize property without a judicial order.
- The institution accepts collateral that may deprive borrowers of their basic survival capacity.

Subcontracting to unethical businesses

 The institution subcontracts collections to businesses that are not subject to the same ethical standards as the institution.

Careless debt extension

 The institution issues automatic debt extensions.



ADDITIONAL TIPS COLLECT APPROPRIATELY TO COLLECT THE HONEY

instructions and laws...etc.

when and where a debt collector may communicate with a client/guarantors. Example of inconvenient times: before 8am and after 5pm.

Places: work, public places, at funerals, worship places ...etc.

Impose limits on the number of calls that can be made.

Ask about suggestions and complaints reports that are related to collection and make informative decisions accordingly.



Make them clear and set sanctions: Examples:

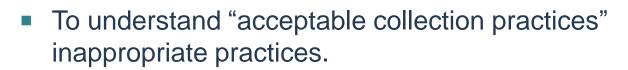
- Publish names, along with debt information
- Use bad language
- Call repeatedly
- Make false statements or agents represent themselves as other individuals such attorneys or police
- Misrepresent the due amounts
- Try to collect extra fees.....

And many other abusive practices



SO FAR.....

Fair collections is critical to your business → if you treat your clients well, even during
 delinquency, you will increase your chances of recovering the loan.





, it would be useful to identify

 Institutions would avoid collection dilemmas if they ensure that previous credit processes are conducted correctly.



 Having a clear collection guide/policy accountability is absolutely necessary.



while ensuring training and

STRENGTHENING CLIENT PROTECTION COLLATERAL

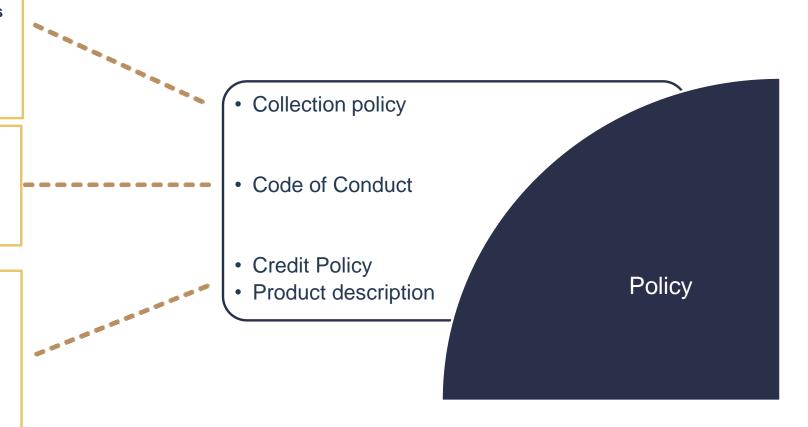
ALIGN WITH CLIENTS' ACCESS





- A list of appropriate and inappropriate debt collections practices, including collateral seizing practices.
- **Collateral seizing** practices: The provider informs the client prior to seizure of collateral, allowing the client to attempt to remedy the default.
- A prohibition on sales of the clients' collateral to the provider, the staff of the provider, to their relatives, or to third parties involved in the seizing process.
- Loan officers can not force to sell assets.

- The provider has a list of assets that cannot be pledged as collateral, which includes items that would create severe hardship or significant loss of income earning ability for the client.
- Collateral valuation is based on a verifiable market price/resale value. The credit committee or second level approval verifies the collateral valuation.
- The minimum requirement for the value of collateral does not exceed two times the loan amount, and cash collateral does not exceed 20% of the loan amount.
- Cash-flow based repayment capacity analysis = the provider does not use guarantees, guarantor income, collateral, and/or insurance coverage as proxies for repayment capacity or as the main basis for loan approval.







Collateral seizing and appropriate debt collection practices is integrated in the regular monitoring activities for Internal audit and management reviews

- Informing clients
 Collateral seizing
 Loan officers can't force selling of assets
- The provider informs the client prior to seizure of collateral, allowing the client to attempt to remedy the default.
- Employees cannot force selling of assets to cover the repayment.

STRENGTHENING CLIENT PROTECTION RESCHEDULING, REFINANCING AND WRITE OFF LOANS

POLICY IS A MUST

RESCHEDULING AND WRITE-OFF POLICIES

Exceptional basis and not as a reaction to delinquency. Examples of client Disasters distress: Illness Rescheduling and write-off Death policies **Business loss** Policy In case of rescheduling, repayment capacity and willingness must be assessed



STRENGTHENING CLIENT PROTECTION BEST PRACTICES

STRATEGIES



I ADOPT PROACTIVE STRATEGIES TO QUELL DELINQUENCY BEFORE IT STARTS

Educate Clients about Product Features and Collections Fees and Charges



Address Customer-Service

Complaints Quickly



Establish Mutually-Agreeable

Payment Dates



Use Positive Reinforcement





II IMPROVE INTERNAL PRODUCTIVITY OF THE COLLECTIONS AREA

Determine the Appropriate

Collections Procedures.



Create Staff Incentives



Select and Train Staff Members



III ENSURE QUALITY INFORMATION GATHERING AND MANAGEMENT

Develop Efficient Information and Support Systems Management reports, Monitoring reports, Risk-Management reports



Establish an Internal Past-Due



Ensure Quality of Client Information.



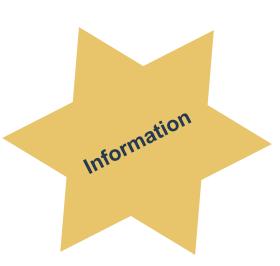
Establish Internal Methodological



Control Units

Cash-flow based analysis





Committee

IV DEVELOP CLEAR STRATEGIES FOR COLLECTIONS OF DELINQUENT LOANS

Establish Client-Contact Policies



Segmentation



Risk-Based Collections



Payment Alternatives





COLLECTION JOURNEY

AGRICULTURAL BANK OF EGYPT



CLIENT PROTECTION MATTERS



Before Collection Sector creation

- Collection activities used to be through branches.
- High default rates.
- No data or reporting.
- MIS system does not support loans' performance tracking

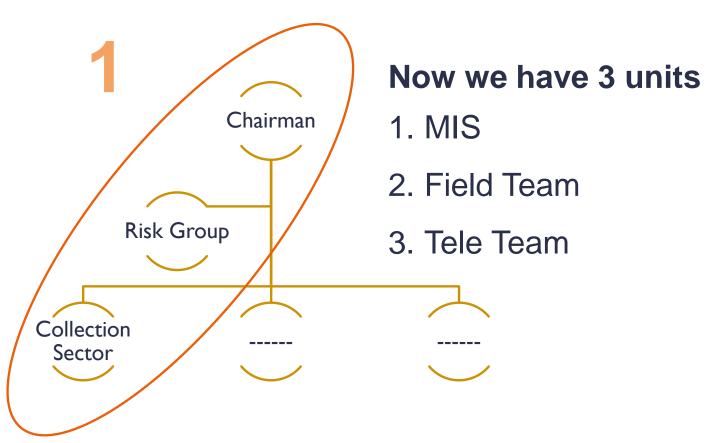


WHY COLLECTION SECTOR?

- To **standardize** the collection activities
- To develop a **collection policy and processes** that unifies and controls the collection practices all over the bank
- To establish and develop a **reporting system** that can generate solid reports that management can make **informative decisions**. (ex. Total portfolio/product, delinquency repot/product, payment report, PAR, etc....)
- To select and train a collection team to deal with clients in a **professional manner** to reduce and minimize delinquency and accordingly reduce losses and bad debts and to maintain **healthy portfolio**.



JOURNEY OF CREATION



Main Activities:

- 1. Building the Hierarchy Charts
- Developing the documents: policy, procedures, strategies and job descriptions.
- 3. Recruitment
- 4. Staff training plans
- 5. Building the MIS





WHAT ACCOMPLISHED AS A RESULT OF INTRODUCING CLIENT PROTECTION STANDARDS



At ABE we stop calculating the interest after 180 days

Clients' segmentation

- Ability & Willingness: we start this segmentation after31 days of delay.
- After more than 2 broken promises, staff start to call clients to ask about reasons and according to a quick survey, analysis and results show the segment easily.

Note: when the client appears to be able and willing, we ask about the problem, we work with him to solve the problem.

- Better understanding to the clients' situations
- Easy to decide the follow up plan.
- Clients' are assigned to collection teams according to the segment.
- And, this helps in risk assessment, set long term expectations for the portfolio and assess credit process in general.



WHAT ACCOMPLISHED AS A RESULT OF INTRODUCING CLIENT PROTECTION STANDARDS



The list is being updated frequently upon any new incidents or clients' feedback or complaints

Example of inappropriate behaviors:

- Calling at night
- Talking to the client in public places or occasions
- Threating the client
- Giving wrong info
- Using abusive language
- -----

List of appropriate and inappropriate behaviors

- We focused on HOW we should do things, and decided to have our team fully understand what to do and what they shouldn't do, what to say and what not to say, how to behave and what are the unaccepted behaviors.
- List of inappropriate behaviors is now part of the collection manual with clear sanctions in case of breach.
- Collection Code of
 Conduct is under
 development (final approved
 version is expected by the
 end of April).



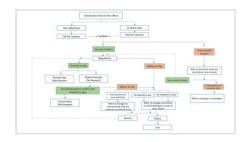
- Respectful reputation for the collection team and the bank
- Clients are open for negotiations and discussing as they know they will not be abused or disrespected.
- Good feedback from clients.





WHAT ACCOMPLISHED AS A RESULT OF INTRODUCING CLIENT PROTECTION STANDARDS





Collection Process

- Now we have a clear collection process with a well defined steps and phases.
- The process is part of the collection manual and employees are being trained to understand each activity and how to implement and practice.
- All activities should be recorded to facilitate continuous monitoring and follow-ups.



- Organized work process and team harmony.
- Easy to follow up and build a history for each activity and each client as well.
- Easy to put the policy into practice by having a well defined process and train staff accordingly



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WHAT ACCOMPLISHED AS A RESULT OF INTRODUCING CLIENT PROTECTION STANDARDS



Staff Training

- For new joiners:
 - Code of Conduct
 - Customer handling
 - Data privacy
 - Collection policy
 - Portfolio analysis

A refresher every 3 months in case of any updates or changes on the Collection policy and process.



- Well trained staff
- Solid knowledge of the bank's core principles when dealing with clients.
- Staff are fully accountable as they know exactly what are the sanctions in case of miss conduct or policy breach.

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WHAT ACCOMPLISHED AS A RESULT OF INTRODUCING CLIENT PROTECTION STANDARDS



Write-off and rescheduling

Examples of cases: Unexpected events like a natural disaster, illness, business loss (crops or livestock) due to specific reasons

The circular is a base for the policy development that is currently under process.

- A circular that is fully details how and when to reschedule or write-off loans.
- The circular specifies the cases when to reschedule loans and how the repayment capacity should be considered.
- The circular included a clear workflow that includes field visits, required documents when applicable and the needed approvals for each case.



- Understanding cases and reasons
- Process became organized, documented and easy to control
- Better reporting system.

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FURTHER MORE

Data and reporting:

- High quality reports
- Better data quality
- More detailed analysis and disaggregation of data.

Better relationship with clients:

- Noticeable change of clients' attitude towards the bank's collection team
- Increased number of active communications with clients.
- 33% of not willing clients converted to willing.
- Positive feedback.

Portfolio Quality

All IS AS PLANNED

We started with CP implementation early 2022. As of December 2022; the performing Loans increased by 3%, while the 30 days past due delinquent portfolio decreased by 2.26% moreover, the 30+ delinquency ratio decreased by 0.86%.

COLLECTION IN A CERTIFIED COMPANY TAMWEELCOM JORDAN



IT IS A CULTURE



TAMWEELCOM - COLLECTION IN A CERTIFIED MFI

WHY?

Because we are building a partnership with our clients, it is important to define core values and fair practices

HOW?

- State core values
- Lending policies and operational processes are designed in a way that prevents stress from creeping up between the company/staff and clients.
- Transparency
- Efforts to rule out the possibility of abuse or miss conduct.
- Clients' awareness / education
- Credit bureau
- Code of conduct
- Complaints handling
- Clients' insights and feedback
- Staff training





TAMWEELCOM - COLLECTION IN A CERTIFIED MFI

- Our ethics and code of conducts are visible from the minute we first speak with a client. Each individual in Tamweelcom understands that integrity will drive our business and It will drive the customer experience
- Quality of Service

 All of collection process will be worse if we are not properly trained and do not have confidence in our tactics.

Values

• Transparency Communicate clear, sufficient and timely information in a manner and language clients can understand so that clients can make informed decisions.

• Fair and Respectful Practices

Much of the stress and nastiness could be avoided if people were approached as humans first and an account second.



• Privacy The privacy of client data respected in accordance with the laws and regulations .



TAMWEELCOM - COLLECTION IN A CERTIFIED MFI

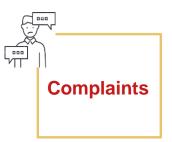
ALL IN PLACE



- Code Of Conduct
- Collection Manual
- Transparency and Discloser
- Rescheduling and write-off
- Credit policy client's capacity
- Appropriate products design and delivery
- Considering exceptional circumstances that might befall a client in case of distress or emergency.



- Collection process
- In appropriate behaviors
- How to deal with defaulted clients.
- Situations of specific distress
- Portfolio management
- Client relationship management
- Code of Conduct
- Credit analysis



Tamweelcom has a specialized section with qualified and well-trained staff within the Compliance Department to receive and handle Customer Complaints and report regularly to the CEO, board compliance committee, and CBJ.



- Portfolio quality
- Product analysis
- Complaints
- Write off and rescheduled loans
- Satisfaction and dropout surveys



- Well structured internal audit reporting
- Board committees Audit, risk and compliance



TAMWEELCOM - COLLECTION IN A CERTIFIED MFI TRANSPARENCY MATTERS

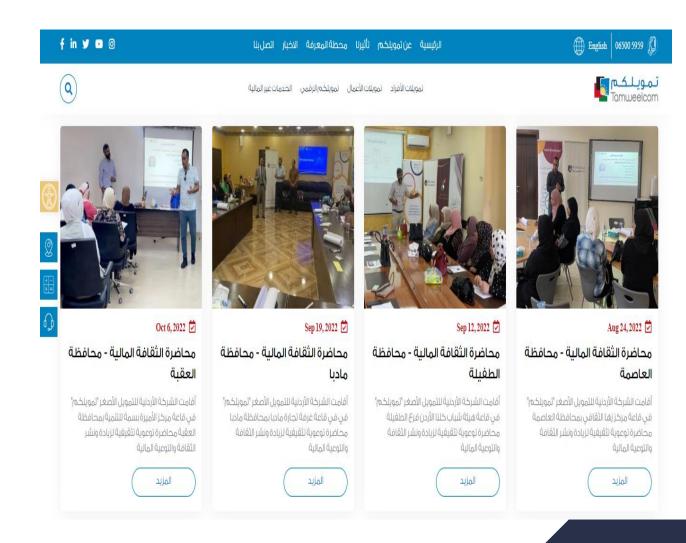
- ✓ All the loan product details such as loan amount, term, fees, interest rates, installments schedule, and other information are clear and transparent on the company's website and through our display screens inside the branches.
- ✓ We inform the client of the loan contract details i.e., terms and other obligations such as consequences of default payments, prior contract signing, client (and grantor(s)-if any) receive a loan term sheet (key facts summary) as well as a copy of the loan contract.





TAMWEELCOM - COLLECTION IN A CERTIFIED MFI CLIENT EDUCATION MATTERS

- Continuous efforts to maintain clients' understanding
- Awareness lectures and on financial consumer protection – client rights and responsibilities
- Financial literacy Capacity building on managerial and financial skills for entrepreneurs especially on financial management and consequences of default.
- Simulation training of savings methods
- The importance of Credit bureau and credit history





TAMWEELCOM - COLLECTION IN A CERTIFIED MFI CLIENT INSIGHTS AND FEEDBACK MATTERS

- Frequent satisfaction and dropout surveys.
- Focused efforts on interviewing clients of employees portfolios who we received complaints against them.
- Include complaints as an indicator of the incentives scheme and appraisals with a significant weight.

Satisfaction Rate: 93%

Retention Rate: 85%



TAMWEELCOM - COLLECTION IN A CERTIFIED MFI IT BECAME A CULTURE

Even in case of default, respectful treatment of clients became a culture as in Tamweelcom we consider exceptional circumstances that might occur.

Clients - in case of distress or emergency – **know** that they have the option to ask for any of the following options:

- Postponement of Installments.
- Re-scheduling the loan payments in proportion to the client's ability to pay.
- Granting exemptions on due payments.
- Write off the remaining loan balance for humanitarian reasons.

Recently: the Central Bank of Jordan issued new **instruction for collection practices**, but we found out that we don't need to change anything as all is already in place.

Yes, it is already in our culture.





COLLECTION INDICATORS CLIENT PROTECTION ASSESSMENT

ENTRY, ADVANCED AND PROGRESS



CP REQUIREMENTS -----1/5

Standard 1

Essential practice

Indicator

Indicator

The provider's products, services, and channels benefit clients.

- 1.4 The provider's products, services, and channels protect clients from harm.
- The provider tailors repayment schedules to the client's **cash flows and type of business**.
- 1.4.2 The provider's collateral and guarantor requirements do not create severe hardship for clients.
- **Details**1.4.2.1 The provider has a **list of assets that cannot be pledged as collateral**, which includes items that would create severe hardship or **significant loss of income earning ability for the client**.
 - 1.4.2.2 Collateral valuation is based on a verifiable market price/resale value. The credit committee or second level approval verifies the collateral valuation.
 - 1.4.2.3 The minimum requirement for the value of collateral does not exceed two times the loan amount, and cash collateral does not exceed 20% of the loan amount.
 - 1.4.2.4 If the provider collects title documents, it returns them to the client once the loan is repaid.



CP REQUIREMENTS -----2/5

Standard 2

Essential practice

Indicator

Details

The provider does not over-indebt clients.

- 2.1 The provider makes loan decisions based on a client's **repayment capacity**.
- 2.1.2 The provider conducts a cash flow analysis to evaluate repayment capacity.
- 2.1.2.1 The provider conducts a **cash flow analysis** that considers income, expenses and debt service related to business and family, and any other sources of revenue, including informal sources.
- 2.1.2.2 The provider does not use guarantees, guarantor income, collateral, and/or insurance coverage as proxies for repayment capacity or as the main basis for loan approval.



CP REQUIREMENTS -----3/5

Standard 3

Essential practice

Indicator

Essential practice

Indicator

Details

Indicator

The provider gives clients clear and timely information to support client decision making.

- 3.1 The provider is transparent about product terms, conditions, and pricing.
- **3.1.1** The provider gives a Key Facts Summary Document to borrowers before they sign a contract. The document contains the following information:
 - Total loan amount
 - Pricing, including all fees
 - Total cost of credit: all principal, interest, and fees plus cash collateral
 - Disbursement date and loan term
 - Repayment schedule with principal and interest amounts, number, and due dates of all repayment installments
 - All deductions from principal disbursement (e.g.: first installment, commissions, fees, cash collateral, taxes), if applicable
 - How cash collateral / mandatory savings can be used in case of default, if applicable
 - Moratorium interest rates, terms, and conditions, if applicable
 - 3.2 The provider communicates with clients at appropriate times and through appropriate channels.
 - 3.2.3 The provider gives clients clear and accurate account balance information in the following ways:
- 3.2.3.2 Sending automatic messages to clients whenever there is an automatic deduction from the client account.
- **E** 3.2.3.3 Providing **receipts**, **on paper or electronically**, for every transaction.
- 3.2.4 If loan repayments are **automatically debited** from a client account, the provider sends clients a loan **repayment reminder** at **least one day before** loan repayments are due.

CP REQUIREMENTS -----4/5

Standard 5

The provider enforces fair and respectful treatment of clients.

Essential practice

5.4 The provider protects clients' rights to **respectful treatment** during the loan collection process.

Indicator

5.4.1 The provider's **collections policy** includes the following:

Details

- 5.4.1.1 A list of appropriate and inappropriate debt collections practices, including collateral seizing practices.
- 5.4.1.2 A schedule for the **collections process** that allows time for the debt collector to determine the **reasons** for a client's default and for the client to **find solutions**.
- 5.4.1.3 The provider informs the client **prior to seizure of collateral**, allowing the client to attempt to remedy the default.
- 5.4.1.4 A **prohibition** on **sales of the clients' collateral** to the provider, the staff of the provider, to their relatives, or to third parties involved in the seizing process.

Indicator

5.4.2 The provider **restructures or writes off** loans on an exceptional basis, based on a list of cases of specific distress.

CP REQUIREMENTS -----5/5

Standard 8	The governance and management are committed to Client Protection, and HR systems support its implementation
Essential practice	8.2 Management makes strategic and operational decisions based on social and financial data.
Indicator	8.2.2 Internal audit and/or risk management integrates the following criteria into regular monitoring activities:
Detail	8.2.2.4 Collateral seizing and appropriate debt collection practices
Essential practice	8.3 The provider trains all employees on its social goals and on client protection.
Indicator	8.3.1 The provider trains employees on client protection, in line with their roles and responsibilities. The training covers at minimum the following topics:
Detail	8.3.1.4 Debt collections practices and loan recovery procedures



SUMMARY

- Collections is a customer service that FSPs must consider before launching new credit programs.
- Not only does it play an integral role in the overall lending cycle, but it is also a valuable source of feedback on the processes that take place prior to collections.
- Institutions should be aware of the client protection concerns relating to collections. What should be taken away is the understanding that excellent collections strategies should begin before there is a delinquency problem.

FINALLY

Collection techniques may vary based on the reasons for the client's default (unwillingness to pay or inability to pay). FSPs may train employees to apply different collection techniques at different times, but the same standards of behaviors are applied to all clients.

In other words, inappropriate practices are never accepted, even when clients are able to pay but unwilling to.



QUESTIONS



KEY LINKS ... AND MORE TO KNOW



Would you like to receive the notifications of upcoming events, tools and resources? Sign-up for our newsletter?

https://cerise-sptf.org/mailing-list/

Have you checked out the new standards?

https://cerise-sptf.org/universal-standards/

Assess your practices in SPI Online https://en.spionline.org/



To know more about the Client Protection Pathway

For Financial Service Providers who want to sign-up for the Pathway

The CP Standards and the CP Assessment Tool

Keep following our CP Implementation Series

Contact us on cppathway@sptfnetwork.org



THANK YOU!





