

The missing link for agents: A review of agent grievance resolution systems in India





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यदि अर्थात् 1000 रु के बराबर का गारंटीकृत पेंशन प्रदान करने का ध्यान देकर बना है। 60 वर्ष की आयु पूरी होने पर सम्बन्धित ब्याज किए गए अंश के अनुसार ₹ 1,000/2,000/ 3,000/4,000/5,000 प्रति माह का गारंटीकृत न्यूनतम पेंशन मिलेगा है।

अटल पेंशन योजना के बारे में

- **आयु वर्ग** - पेंशन निधि विनियमक एवं शिक्षण प्रधिकरण (पीएनएसडीए) अंतर्गत यह शर्तिका सम्बन्धित के बराबर ब्याज वाले से अटल-डिफेंड सुविधा के माध्यम से महिला/ शिवाजी/कर्मचारी अंतर्गत
- **कैद सरकार की गारंटीकृत न्यूनतम पेंशन** रु 1000 से रु 5000 प्रति माह
- **पार प्राक** - 18 वर्ष से 40 वर्ष की आयु समूह के सभी सम्बन्धित

- **द्विपक्ष लाभ के साथ पेंशन**
 - 60 वर्ष के बाद पेंशन शुरू होगा तथा आजीवन प्राप्त होगा
 - सम्बन्धित की दुर्भाग्यपूर्ण मृत्यु के मामले में, पति या पत्नी को पेंशन मिलेगी
 - सम्बन्धित और पति या पत्नी की दुर्भाग्यपूर्ण मृत्यु के मामले में - निधि को बूझ लगे मिलेगी
- पेंशन के अन्तर्गत **आयु** और **धुतान** के तरीके में परिवर्तन हो
- **एपीए**

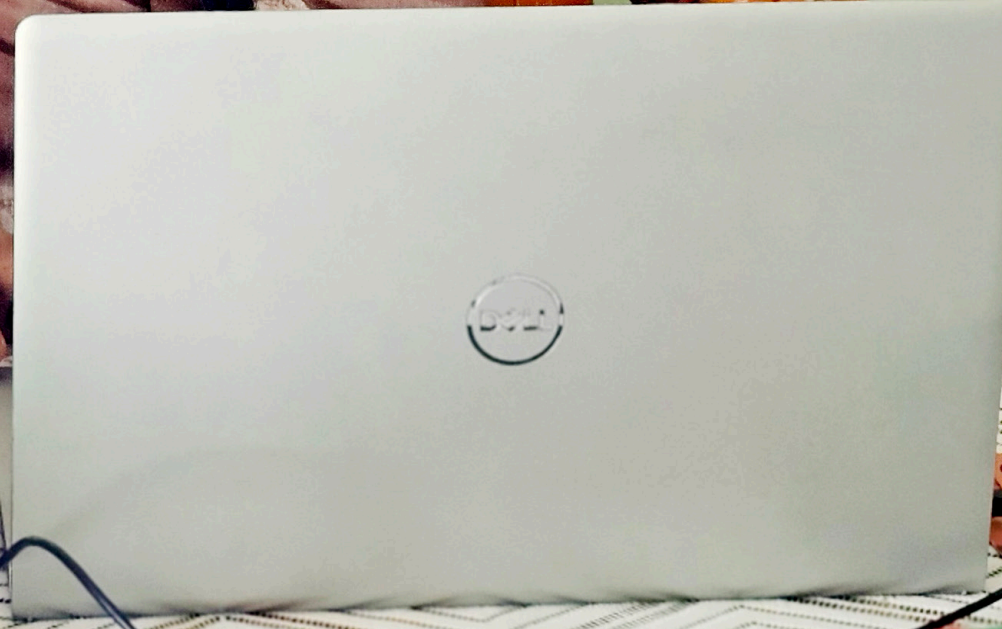


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आजीवन गारंटीकृत न्यूनतम मासिक पेंशन (₹ 1000 से ₹ 5000 तक)

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सम्बन्धित और पति या पत्नी की मृत्यु के बाद निधि को मिलेगा



शेडी का नाम :

शेडी का पतेपत्र नं. :

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Table of contents



Executive summary	5
Chapter 1: Introduction to GRM	8
Chapter 2: What is agent GRM and why does it matter?	12
Chapter 3: Current GRM practices across providers and the challenges they face	18
Chapter 4: Key design principles for an effective GRM system	26
Chapter 5: Way forward for the agent GRM system in India	34
Annexure	40
1.1 Methodology	41
1.2 Limitations of the study	41
1.3 Using the SCORE framework	42

Executive summary

India's grievance resolution architecture has expanded rapidly with the digitization of financial services. Regulatory mechanisms, such as the Reserve Bank of India (RBI's) Integrated Ombudsman Scheme, Centralized Public Grievance Redress and Monitoring System (CPGRAMS), and sector-specific portals have strengthened consumer protection, improved transparency, and delivered consistently high disposal rates.

For instance, in FY 2022–23 alone, the RBI received more than 703,000 complaints to achieve a 97.99% resolution rate, while CPGRAMS resolved around 1.4 million grievances in a single month with an average turnaround of 12–15 days. These systems have played a critical role in building trust in formal finance, particularly for low- and moderate-income users. Yet, this progress has been overwhelmingly customer-centric, which has left a critical gap in how grievances faced by Business Correspondents (BCs) are addressed.

Addressing this gap is critical as India today has more than 1.6 million BC outlets, of which 1.59 million operate in rural areas and account for 96.6% of all rural banking access points. In FY 2023–24, BC agents facilitated 2.7 billion transactions worth INR 9,862 billion (USD 119 billion). Despite this scale, the growth



in BC-facilitated transactions slowed to 7.3% year-on-year, while the number of village-level BCs declined by 5% between 2022 and 2023. These trends indicate mounting stress within the agent ecosystem that cuts across recruitment, onboarding, viability, operations, and retention.

At the heart of this stress lies the absence of a reliable, formal grievance resolution mechanism for agents. This report, developed as part of the “**Scaling agent viability and quality**” project, commissioned by the Gates Foundation, highlights the current status of the grievance redressal mechanism (GRM) for agents in India and offers a practical framework to address the gaps and design agent-friendly GRM systems.

While customer GRMs are mandated, monitored, and digitized, agent grievance pathways have evolved informally, shaped by legacy field models, escalation led by Corporate Business Correspondents (CBCs), and ad hoc communication channels, such as phone calls or WhatsApp groups. As a result, agent grievances related to failed transactions, delayed settlements, commission disputes, device failures, or fraud exposure often remain undocumented, inconsistently resolved, and invisible at the institutional level. This weakens accountability, deprives providers of operational intelligence, and leaves agents without effective support, even though they are occasionally the sole interface for digitally inexperienced customers.

The consequences extend beyond agent dissatisfaction. Rising transaction volumes driven by the *Aadhaar* Enabled Payment System (AePS), Unified Payments Interface (UPI), and Direct Benefit Transfer (DBTs) mean that even a small failure rate translates into a large volume of unresolved issues. For agents operating on thin margins, a single failed or unreversed transaction can wipe out a day’s income.

Evidence from provider interactions suggests that 15–20% of agents become dormant, partly due to unresolved operational issues. This churn could drop to below 10% with adequate grievance support. At the same time, poor agent grievance handling directly undermines customer trust. When agents cannot explain or resolve failures, customers often assume fraud or systemic malfunction, eroding confidence in digital financial services.

Most providers have not institutionalized dedicated agent grievance resolution mechanisms (AGRMs) because agent issues are considered operational irritants rather than strategic risks. High perceived implementation costs, fragmented ownership across banks, CBCs, and FinTech partners, lack of regulatory mandates, and high agent turnover all reduce incentives to invest in a dedicated AGRM. Our discussions with stakeholders suggest that setting up a formal AGRM can require upfront investments ranging from INR 500,000 to INR 6 million (USD 5k–67k), alongside recurring costs of INR 13–14 (USD 0.16–0.17) per complaint and INR 600–1,000 (USD 7.2–12) per escalation.

The cost to establish formal AGRMs is often cited as a barrier. Yet, evidence from providers who have implemented them shows that these investments deliver measurable returns, as reflected in higher agent retention, lower dormancy, improved service quality, and stronger customer trust. Formal AGRMs have been associated with up to 1.3x higher agent satisfaction and retention, improved service continuity, and lower operational friction. Over time, the gains from reduced churn, faster resolution, better risk detection, and stronger trust significantly outweigh the initial investment.

A look at the current practices across public sector banks, payments banks, and FinTech-led networks highlights stark differences in the maturity of their GRM systems: FinTech and some payments banks use integrated, technology-driven systems with faster turnaround times, while public sector banks rely on legacy platforms and informal escalation that often result in delays of weeks or months. Across all models, effectiveness depends less on the channel used and more on core design features—system integration, accessibility, ownership, responsiveness, and the ability to learn from grievance data.

The report builds on these insights to introduce the SCORE framework. This structured diagnostic tool translates good practice into five critical dimensions: System integration, channels and accessibility, organizational commitment, responsiveness, and empowerment through feedback. The framework enables providers and policymakers to objectively assess existing systems, benchmark performance, and prioritize improvements without prescribing a one-size-fits-all model.

When we look ahead, establishing effective AGRMs must shift from being an operational choice to a core priority for India's financial services ecosystem. As agent-led models continue to anchor last-mile delivery, the sustainability of these networks will depend on transaction volumes and technology upgrades alongside the strength of the support systems that enable agents to operate with confidence, fairness, and predictability.

This would require concerted action at three levels. Regulators and policymakers would play a critical role in setting clear expectations by embedding agent grievance redress within supervisory and compliance frameworks, defining minimum standards, and enabling sector-wide coordination. Providers must treat agent grievances as a strategic input and invest in dedicated systems, integrate grievance workflows with agent-facing platforms, and use grievance data to proactively address recurring operational and risk issues. At the same time, agents must be empowered through awareness, accessible channels, and safeguards that allow them to raise concerns without fear of retaliation.

Chapter 1:

Introduction to GRM



The grievance redress system forms a critical pillar of accountability and trust in service delivery. An effective grievance redress system is essential for ensuring accountability, transparency, and service quality within financial systems. For users, it provides a formal and accessible channel to raise concerns, seek timely resolution, and reduce the risks arising from service failures or disputes. For institutions and the broader ecosystem, it generates actionable feedback to identify systemic gaps, improve operational processes, strengthen oversight, and reinforce trust and credibility in formal financial services.

The Reserve Bank of India (RBI) defines a [grievance resolution mechanism \(GRM\)](#) as a structured process to receive and address complaints fairly and expeditiously, regardless of their source. This definition underpins the grievance redress architecture across the financial sector. In India, the grievance redress framework for banking, payments, and related services is anchored by the Reserve Bank of India (RBI). Within this overarching framework, sectoral regulators oversee grievance redress within their respective domains. The overall system is designed as outlined below:



At the **financial sector**, the RBI plays an overarching role through the [Banking Ombudsman](#) and the [Integrated Ombudsman Scheme \(RB-IOS\)](#), which centralizes the receipt and adjudication of complaints against banks, [nonbanking financial companies \(NBFCs\)](#), and payment system providers.



For **payment systems**, the [National Payments Corporation of India \(NPCI\)](#) supports dispute resolution and complaint escalation for payment instruments, such as [Unified Payments Interface \(UPI\)](#), [Immediate Payment Service \(IMPS\)](#), [Fast Electronic Toll Collection \(FASTag\)](#), and card networks. Grievances are typically raised first with the customer's bank or application provider and escalated to NPCI as required.



Other regulators follow similar tiered arrangements. For instance, the [Telecom Regulatory Authority of India \(TRAI\)](#) oversees grievance handling for telecom services, including unsolicited commercial communications, through mandated service-provider-level complaint centers and escalation to appellate authorities. Insurance and securities regulators, such as the [Insurance Regulatory and Development Authority of India \(IRDAI\)](#) and the [Securities and Exchange Board of India \(SEBI\)](#), operate their own grievance portals and escalation mechanisms for entities under their supervision.



Beyond sectoral regulators, government-wide platforms provide an additional channel for grievance escalation. The [Centralized Public Grievance Redress and Monitoring System \(CPGRAMS\)](#) allows citizens to lodge grievances with central ministries and state governments. Other portals, such as the Prime Minister's Office ([PMO](#)) and state-level citizen portals (for example, [Karnataka's iPGRS](#) and [Andhra Pradesh's Spandana](#)), enable escalations to executive offices and state administrations. For complaints involving cyber-fraud, phishing, unauthorized UPI transactions, or account takeovers, the [National Cyber Crime Reporting Portal](#) serves as a dedicated channel. And the [Sachet portal](#), operated under the [SLCC framework](#), enables customers to report unregulated lenders, illegal deposit schemes, and other unauthorized financial activities. The portal directs registered grievances to the relevant state regulatory and enforcement agencies, which then examine the cases and initiate appropriate action.

Within this broader landscape, the grievance redress mechanism for banks and NBFCs is the most extensive and widely used, given the reach of these institutions and the volume of customer interactions they handle.

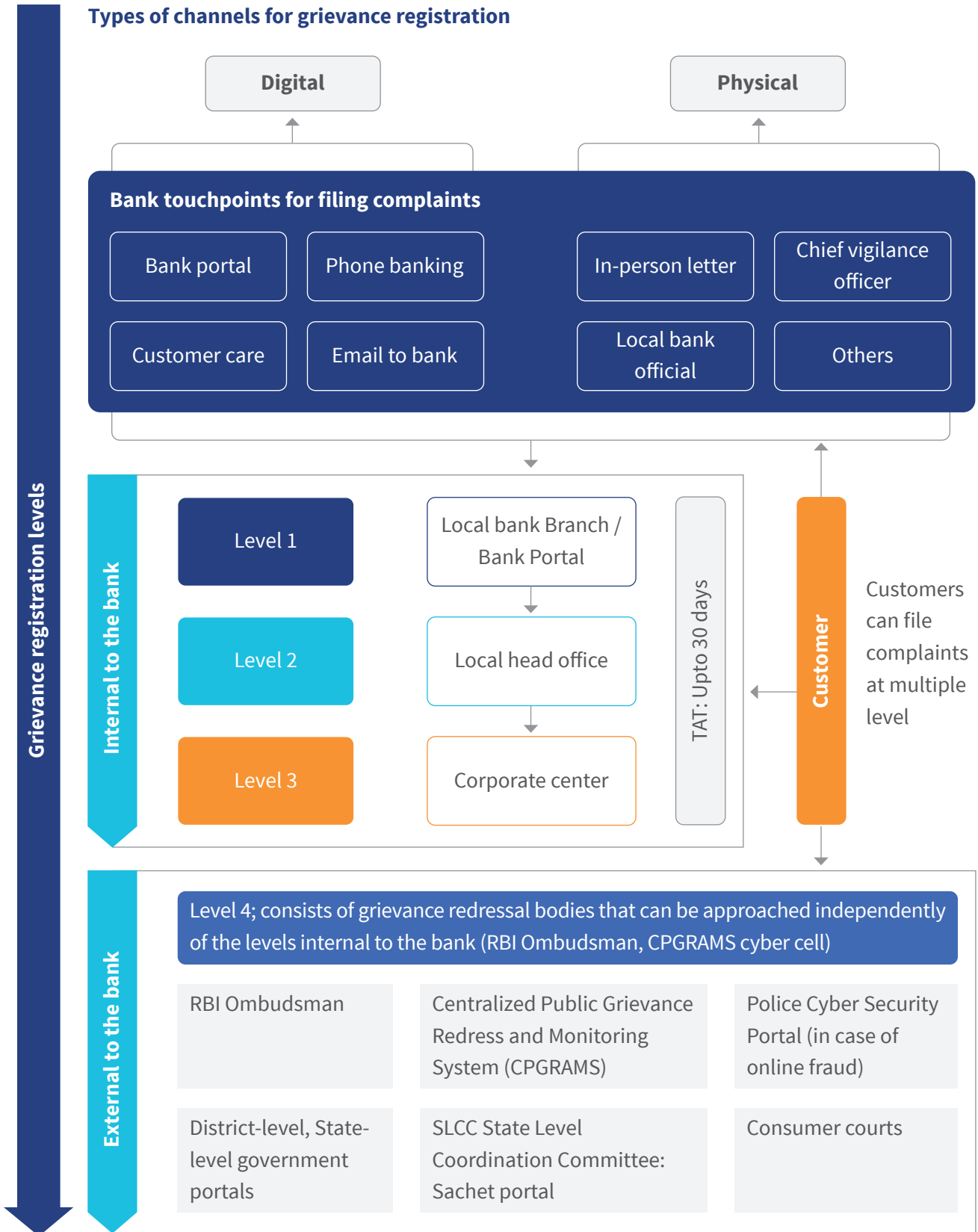


Fig 1: Comprehensive grievance redressal mechanism available across all banking channels

For banks and NBFCs, grievance redress begins within the institution through multiple digital and physical channels. Customers can lodge complaints through official websites, dedicated portals, mobile banking applications, customer care centers, emails, phone banking, and in-person submissions at branches or service points. Once a complaint is recorded, it follows a structured internal escalation process.

The final internal tier lies with the institution's corporate or central grievance team, which is expected to provide a resolution within a standard turnaround time of up to 30 days. This internal resolution requirement serves as the foundation of the redress architecture and is often a prerequisite for approaching external mechanisms. If a grievance remains unresolved within the mandated period, customers have recourse to external redress avenues.

During FY 2022–23, the Reserve Bank of India received more than 700,000 grievances under its Integrated Ombudsman Scheme (RB-IOS). This marked a 68.2% increase in complaints compared to the previous year. Complaints against banks, especially those related to mobile or electronic banking, accounted for 83.8% of these complaints, with broad participation from urban and rural areas. Despite the high number of complaints, the Ombudsman offices achieved a 97.99% resolution rate, 98% with an average turnaround of about 33 days. Meanwhile, 57.5% of complaints were resolved through mediation or mutual settlement.

Similarly, the CPGRAMS has emerged as a high-volume, cross-sector grievance platform for complaints against central and state government authorities. During Oct 2025, the CPGRAMS portal recorded 1.3 million grievances and resolved ~1.4 million public grievances, including 59,000 pending cases from previous months. The average turnaround time (TAT) for redress was 12 to 15 days. These figures underscore the platform's operational scale and its ability to process and resolve large volumes of complaints within relatively shorter timeframes.

Together, these mechanisms have played a critical role in improving customer experience, reinforcing trust in formal financial services, and strengthening confidence in institutional accountability. This is particularly important for low- and moderate-income (LMI) users, for whom issues such as failed transactions, biometric mismatches, fraud, or unauthorized debits can have immediate and severe financial consequences.

However, the rapid growth of digital financial services has been placing increasing pressure on existing GRM systems. Rising transaction volumes, greater product complexity, and expanding user bases heighten the risk of delays, uneven disposal outcomes, and system congestion. While current mechanisms show strong aggregate performance, variations in turnaround times, fragmentation across platforms, and uneven visibility of grievances across institutions continue to pose challenges. Without further streamlining and coordination, these pressures could increase backlogs, dilute accountability, and erode trust at scale.

Chapter 2:

What is agent GRM and why does it matter?



India's digital financial ecosystem has grown at an unprecedented pace over the past decade, with business correspondents (BCs) and retail agents becoming the backbone of last-mile delivery. Today, India has more than 1.6 million BC outlets, of which 1.59 million are in rural areas, and 360,000 are in urban areas. In rural India, BCs now account for 96.6% of all banking access points, which underscores their critical role in advancing financial inclusion. In FY 2023–24, BC agents facilitated 2.7 billion transactions worth INR 9,862 billion (USD 119 billion) for last-mile customers.

Despite the massive outreach, growth in BC-facilitated transactions has slowed to just 7.3% as compared to the previous FY. Even more concerning is the steady decline in the total number of BCs in villages, which declined by 5% from 2022 to 2023, following a 9% drop from 2021 to 2022. This stagnation underscores systemic challenges that cut across the agent lifecycle (ALC).

Recruitment pipelines have weakened as many prospective agents perceive the role as low-margin and high-risk. Onboarding and training processes often remain inadequate and leave agents underprepared for complex digital and financial interactions. Viability pressures that stem from low commissions, rising operating costs, cash-management burdens, and competition from alternative channels erode sustainability. At the same time, agents face operational frictions, such as device downtime, poor connectivity, delayed settlement cycles, and limited recourse when issues arise. Finally, weak performance management systems and insufficient grievance redress mechanisms further discourage retention as they leave agents without reliable support when problems occur.



The figure below shows a snapshot of the challenges faced by agents across the lifecycle.



Fig 2: Challenges faced by BC agents mapped across ALC; Source: [MSC Agent Lifecycle Playbook](#)

These issues are often amplified for female agents, who face additional barriers, such as safety concerns, social biases, limited access to capital support, and household responsibilities.

The GRM landscape in India continues to remain largely focused on the customer. However, as the DFS landscape expands in scale and complexity, the operational challenges agents face continue to deepen. This, then, makes effective AGRM essential, not optional.

Historically, India's regulatory and institutional focus has centered on customer grievance systems, which include both customers and agents, driven by consumer protection mandates and RBI guidelines. In contrast, the grievance pathways available specifically to agents have evolved informally, often shaped by legacy field-based models, distributor-led interactions, and ad hoc communication channels. In most cases, financial service providers (FSPs) deprioritize formal recourse mechanisms for agents over other issues.

Consequently, formal GRM channels for agents either do not exist or are implemented weakly. Agents depend disproportionately on local field staff and corporate business correspondents (CBCs) to raise and resolve their concerns. They also resort to their personal networks or WhatsApp groups to escalate issues. This informality reduces accountability and prevents providers from identifying systemic failures or recurring operational bottlenecks. Further, informal channels are often inconsistent and prone to delays due to the limited capacity and stretched bandwidth of the CBC field teams. This leaves agents, who serve as the first and often only point of contact for many users, without adequate mechanisms to report or resolve their operational challenges.

Therefore, the importance of strengthening AGRMs today stems from several converging factors:



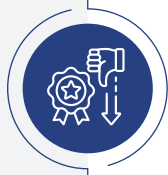
Transaction volumes have surged dramatically due to the rapid adoption of AePS, UPI, and DBTs. With higher transaction velocity, even a small percentage of system failures translates into a large number of unresolved grievances.

1



Agent economics have become increasingly fragile. Rising competition, tightening commission structures, and growing operational costs mean that unresolved grievances directly erode viability. In the absence of a recourse mechanism, a failed AePS transaction or disputed reversal can represent a full day's income for many small agents. Our interactions with agents highlighted that CBC field staff usually create WhatsApp groups to share information and resolve queries. However, in most cases, they receive no response, or the group is restricted to admin-only messages. This leads to unresolved challenges for agents, diminished motivation, and suboptimal quality of service delivery, which adds to the growing concerns of agent dormancy and attrition.

2



Poor grievance systems weaken customer trust. Agents are the first point of contact for low-income and digitally inexperienced customers. When an agent cannot explain or resolve a failed transaction, customers often assume fraud or system malfunction, which harms the credibility of digital payments more broadly. A robust agent GRM therefore strengthens both agent confidence and customer trust in the ecosystem.

3



Regulatory expectations are shifting. As India's digital public infrastructure evolves, policymakers are increasingly emphasizing resilience, transparency, and accountability at all levels of service delivery. Although agent grievance redress is not yet explicitly mandated, emerging discussions within the RBI's FI vision documents, BC certification initiatives, and digital fraud prevention guidelines point to the growing importance of formal support structures for agents.

4



Finally, the absence of structured GRMs deprives providers of critical operational intelligence. When grievances are not systematically captured, providers cannot identify patterns, whether they relate to specific devices, locations, network outages, or systemic risks. This results in a reactive approach where problems are addressed in isolation rather than through institutional learning. A formal GRM gives providers visibility into recurring issues, supports proactive risk mitigation, and informs product and system design improvements.

5

Several studies, which include MSC's experience working with BC agents across geographies, confirm that formal recourse mechanisms strengthen agent quality and service delivery. Empirical evidence suggests that formal recourse mechanisms help improve agent loyalty to the platform. A study conducted by SIDBI also highlights that structured grievance redress mechanisms for BC agents can help improve agent satisfaction, engagement, and retention. For instance, companies with strong complaint-handling systems see a 25–40% improvement in employee retention rates.

Effective grievance resolution positively impacts customers, too. Dissatisfied agents and customers are 35% more likely to remain with their provider after successful grievance resolution. Stakeholder interactions indicate that 15–20% of agents working with a CBC become dormant annually, driven in part by the absence of formal grievance redressal support. CBCs working closely with BC agents noted that this churn could drop to less than 10% if adequate support mechanisms are provided.

Since no formal definition of an AGRM is available today, we draw on global literature, MSC's field experience with BC networks, and expert consultations to propose a working definition. An Agent GRM is a formal, structured system that captures, assesses, and resolves agent complaints, feedback, and operational issues across the entire agent lifecycle (ALC) in a timely, transparent, and predictable manner.

A well-designed AGRM establishes clear reporting channels, standardized service levels, and transparent escalation pathways that agents can rely on.

An AGRM must fulfil two core objectives:



Efficiency — complaints are acknowledged promptly, assessed impartially, and addressed through fair and participatory processes with a defined appeal route.



Effectiveness — issues are resolved within agreed turnaround times (TATs), supported by systematic tracking and accountability mechanisms.

Technically, an effective AGRM should also incorporate the foundational features of strong redress systems such as accessibility, seamlessness, transparency, accountability, and structured feedback loops.

A robust AGRM also integrates with existing customer relationship management (CRM) or complaint-management platforms to ensure that agent grievances receive the same analytical rigor and institutional attention as customer complaints. Such integration enables centralized documentation, real-time monitoring of complaint flows, and data-driven insights to reveal recurring pain points or systemic weaknesses. The goal goes beyond closed tickets and seeks to create continuous learning loops that enhance agent experience, strengthen operational resilience, and improve the overall performance of the agent network.

Chapter 3:





Current GRM practices across providers and the challenges they face







Global research on AGRM reveals significant performance differences across provider types. Studies from East Africa, for instance, show that agent networks supported by mobile network operators (MNOs) or digitally native providers consistently outperform traditional financial institutions in responsiveness and service consistency. These providers use technology-driven systems, real-time monitoring, and structured escalation processes, ensuring faster resolution and better agent experience. Over time, such systems can also be used to apply data analytics and AI to identify recurring issues and systemic gaps that drive complaints, which will enable providers to address root causes rather than respond only at the case level. Such global patterns underscore the importance of harmonized AGRM standards to guarantee equitable support across diverse business models.





Similar trends are evident in India as well. FinTech-led networks typically demonstrate stronger capabilities due to technology-enabled ticketing systems, dedicated agent support teams, and integrated dashboards. This support enables agents to track ticket status, escalation levels, and timelines, and in the process, enhances transparency and reduces frustration. In contrast, public sector banks (PSBs) and traditional banks rely heavily on manual escalation and field staff, often resulting in days or weeks of delay in resolving issues, particularly for transaction mismatches or settlement disputes. Payments banks occupy a middle ground and offer some structured support. Yet, they still lack the comprehensive grievance capture and tracking tools seen in FinTech ecosystems.





We examined three main types of providers in India that offer agent banking services and assessed their current GRM practices. These were public sector banks, payments banks, and FinTechs and new-age CBCs.¹ The table below outlines the analysis.

Theme 	Public sector banks 	Payments banks 	New-age CBCs or FinTechs 
Available channels to raise grievances	<ul style="list-style-type: none"> In PSBs, the grievance resolution mechanism is typically a common channel for customers and agents. These channels include toll-free interactive voice response (IVR) numbers, designated email addresses, dedicated sections on the bank’s website, and grievance modules within the mobile application, supported by chatbots. 	<ul style="list-style-type: none"> A dedicated, toll-free helpline number for agents is available to register grievances. 	<ul style="list-style-type: none"> FinTechs usually deploy a large fleet of on-ground field staff tasked to visit agents regularly. Other channels include in-app compliant registration, email, and a toll-free number.

¹ The table highlights some of the best practices adopted by different types of providers for agent grievance resolution. This does not represent a standard or universally accepted practice.

Theme 	Public sector banks 	Payments banks 	New-age CBCs or FinTechs 
	<ul style="list-style-type: none"> In some cases, PSBs allow agents to report technical issues specifically. This option is available on the agent-facing application. 		
Grievance handling process	<ul style="list-style-type: none"> When agents raise a complaint, it goes directly to the technical service provider (TSP), which manages the application software at the backend. In these cases, the bank typically lacks direct access to the complaints and has no visibility into the issues agents raise. When a complaint is raised through formal channels, such as mail or IVR, it is registered in the backend. Agents receive a confirmation along with a ticket number. The PSB’s Grievance Resolution Department then calls the agent to clarify the details. However, due to high complaint volumes, the waiting time to collect the grievance details from the agent can be as long as 1 to 2 months in most cases. 	<ul style="list-style-type: none"> In most cases, local field staff register complaints and coordinate with the teams concerned for resolution. The process is largely manual. Its effectiveness depends on whether the field staff visit the agent at the right time. 	<ul style="list-style-type: none"> These field staff provide direct support as they address operational challenges, clarify queries, and assist with day-to-day problem-solving. While this model ensures frequent interaction between agents and provider staff, the grievance handling process remains largely informal. In the case of complaints registered through mail, IVR, or the in-app complaint section, the complaint is directed to the dedicated team that manages agent grievances. Based on the type of complaint, the team contacts the relevant department for resolution and responds to the agent through the same channel. The team provides the expected TAT or resolution status if the grievance is resolved within 2 to 4 hours of being raised.

Theme 	Public sector banks 	Payments banks 	New-age CBCs or FinTechs 
Technology or backend system	<ul style="list-style-type: none"> Typically, centralized complaint management systems are linked to core banking platforms. However, the systems are not integrated with an agent-facing application. 	<ul style="list-style-type: none"> Centralized digital ticketing systems are integrated with agent applications and transaction platforms. The backend analytics are often focused on closure metrics. 	<ul style="list-style-type: none"> Generally, they deploy cloud-based customer relationship management (CRM) and issue-tracking systems closely integrated with agent apps and operational dashboards. These systems support real-time ticketing, automated prioritization, and data-driven insights.
Challenges with the current system	<ul style="list-style-type: none"> Since these channels handle extremely high volumes of complaints, the turnaround time for resolution is often prolonged. Sometimes it extends to 1 or 2 months, and in certain instances, complaints get lost in the system. 	<ul style="list-style-type: none"> Agents are often reluctant to pursue repeated follow-ups, as they fear this could strain their working relationship with the field staff. This lack of follow-up limits the system’s effectiveness and often prolongs the turnaround time for resolution. 	<ul style="list-style-type: none"> The outcomes often depend on the individual initiative of field staff and the nature of the issue raised. As a result, the effectiveness and timeliness of grievance resolution can vary considerably across agents.
Best practices implemented by providers	<ul style="list-style-type: none"> A good practice seen among some providers is to add a grievance resolution section within the agent application (app or platform). Since this app or portal is the primary platform agents use for customer transactions, it also serves as a convenient channel to raise complaints. 	<ul style="list-style-type: none"> In most cases, payments banks include a dedicated grievance resolution section within the mobile application that agents use to conduct transactions. 	<ul style="list-style-type: none"> Some FinTechs offer multichannel grievance resolution mechanisms to support their agents. For routine operational issues, such as device malfunctions, login errors, or connectivity problems, agents can contact a dedicated helpline.

Theme 	Public sector banks 	Payments banks 	New-age CBCs or FinTechs 
	<ul style="list-style-type: none"> Agents can choose from predefined issue categories, which automatically route the complaint to the right team for resolution. These complaints are then tracked through a clear escalation process that defines the steps, responsible teams, and timelines for closure. 	<ul style="list-style-type: none"> Agents can register complaints through this section and receive prompt acknowledgements along with tracking IDs generated by the system. The interface enables grievance submission and provides access to key contact details, which outline the escalation pathway for several types of issues. The interface updates turnaround times for resolution at the time of complaint registration, which allows agents to track expected timelines. During onboarding, the interface also provides agents with printed materials, such as posters or quick-reference guides, which list all key grievance touchpoints to ensure easy access to support. 	<ul style="list-style-type: none"> These concerns are usually resolved within three to four hours, which helps minimize service disruptions. For complex issues that involve customer funds, such as failed transactions, unauthorized debits, or discrepancies in transaction records, agents can submit formal tickets through the provider’s mobile application. The system generates a unique ticket number that allows agents to track the resolution’s progress. The same interface also enables agents to raise grievances on behalf of customers. It offers a single, integrated platform to resolve grievances for agents and customers.

Despite the clear benefits of a dedicated agent GRM, most providers in India have not institutionalized such systems. This is largely because agent issues have historically been viewed as operational hassles rather than strategic risks. Providers tend to prioritize customer-facing GRMs to meet regulatory requirements, while agent grievances are managed informally. As a result, complaints from agents remain invisible, unclassified, and unaddressed at a systemic level. Further, the distributed nature of BC networks—spread across banks, CBCs, and partner FinTechs—creates ambiguity on who owns which part of the problem and reduces incentives to invest in structured redress mechanisms. These factors collectively limit the adoption of AGRMs even though their value for network stability and agent retention is well understood. Other structural challenges include:



Absence of a regulatory mandate: Providers currently do not have an explicit regulatory requirement to establish or report on agent-level grievance systems. While a [BC registry exists](#), it is not regularly updated or maintained, resulting in limited visibility of the active agent base and weakening accountability. In the absence of standardized guidelines, providers operate in silos, which often results in informal and fragmented grievance resolution processes. In ecosystems with multiple providers, this lack of coordination results in delayed, inconsistent grievance resolution, which leads to dissatisfaction among both agents and customers.



Fragmented processes at the provider level: GRM processes remain fragmented across the provider ecosystem, with each institution following its own grievance handling approach. In the absence of aligned processes or shared escalation pathways, there is limited convergence across PSBs, CBC networks, and other ecosystem players. This lack of standardization creates ambiguity on ownership, slows escalation, and makes grievance resolution dependent on bilateral relationships rather than a coordinated system response.






Dependence on CBCs: Since agents are mapped to CBCs, PSBs often assume that grievance resolution will be handled at the CBC level. However, in practice, CBCs operate with limited staff capacity and competing operational priorities, leaving little bandwidth to support agent-level issue escalation.






Lack of standardized processes, feedback loops, and documentation: No uniform complaint categories, TATs, or escalation protocols exist for agent issues. Most providers lack systematic data capture on agent grievances, both qualitative and quantitative. This restricts their ability to identify patterns, track resolution timelines, or design targeted interventions based on evidence.



Implementation cost: A significant primary concern for providers is the cost of implementation. Our discussions with providers highlighted the costs involved in setting up a formal, dedicated GRM for agents. A dedicated agent GRM system typically consists of three cost heads and requires an upfront investment that ranges from INR 500,000 to 9 million (USD 5k-USD 67k) and other recurring expenses based on the system's complexity.

Cost head 	Description 	Expenses for a provider (in INR) 
System setup	<p>This is the cost of setting up a GRM system or the upfront investment for the GRM system (basic or advanced).</p>	<p>The overall range of setup investment can vary between INR 500,000 to 9 million (USD 5k- USD 67k) depending on the channel deployed.</p> <p>For example, we have described the overall and associated costs for a basic IVR setup. This covers two major elements: Set-up expenses and license fees.</p> <ul style="list-style-type: none"> • Set-up expense: INR 40 to 9 million (USD 0.45- USD 101k) • Telecom license fee: INR 1,000 (USD 11) per license per month; typically, providers need 70 to 80 licenses per month <p>If a provider deploys an advanced IVR set-up with voice bots in a regional language, it covers three major cost elements: IVR-plugin cost, license fee, and automation or language-support plugin.</p> <ul style="list-style-type: none"> • Plugin cost: INR 500,000 to 600,000 (USD 5k- 6k) • Licenses as per the mandate: INR 1,000 (USD 11) per license per month; typically, providers need 70 to 80 licenses per month • Tie-up with a third party for language support or automation: Recurring payment and the cost can vary based on the third-party fees and plug-ins, INR 5,000 to 6,000 (USD 57- 68) per month; providers typically need 100 to 200 plug-ins
Complaint handling	<p>Once the system is set up, providers also incur costs per complaint. They typically receive 1,00,000 to 1,50,000 complaints from agents per month.</p>	<p>While the ranges may vary depending on the complexity of the technology and system. On average, providers bear a cost of INR 13–14 (USD 0.15-0.16) per complaint.</p>

Cost head 	Description 	Expenses for a provider (in INR) 
Escalation cost or second-level complaint	In case the complaint is unresolved or not as per agent satisfaction, agents can escalate the grievance. Typically, providers receive 150 to 200 escalations per month.	The overall escalation cost ranges around INR 600-1,000 (USD 7-11) per instance.

Establishing a formal AGRM requires meaningful upfront and ongoing investment in systems, staffing, and process integration. Many providers struggle to justify these costs, particularly in the early years when transaction volumes and revenue streams are still stabilizing. This perceived cost-benefit imbalance has been a key reason why agent grievances continue to be managed informally across much of the ecosystem. However, evidence from providers that have made this investment points to a compelling counter-narrative.

Structured agent grievance handling has been shown to improve agent satisfaction and retention by up to 1.3 times compared to environments without a formal AGRM, which has directly strengthened network stability and service quality. When viewed through a longer-term lens, the gains from reduced agent churn, lower operational friction, improved performance, and stronger trust far outweigh the initial financial outlay. As agent networks scale and mature, the absence of a formal AGRM increasingly represents not a cost saving, but a strategic risk to sustainability and resilience.

Chapter 4:

Key design principles for an effective GRM system



The design of the grievance redress system is key to determining how effectively institutions receive, track, and resolve issues. Even when mechanisms exist, weak design leads to unclear processes, limited accessibility, poor integration across channels, and fragmented ownership, which in turn causes delays and inconsistent outcomes. A well-designed system enables timely resolution through defined responsibilities and escalation paths. It also allows institutions to use grievance data to identify recurring issues, strengthen operations, and improve service quality.

The framework for an effective GRM includes a set of well-defined indicators, each with an assigned score, to assess the effectiveness of agent grievance resolution systems. The indicators align with the key design principles of the GRM system, such as accessibility, confidentiality, responsiveness, inclusivity, effectiveness, and continuous improvement.

The choice of interface may vary across providers based on operational, technical, and financial considerations. These include, for instance, the digital capability of agents, the level of technology integration required for the GRM system, and the cost of maintaining different channels influence the type of interface that can be deployed. Depending on these factors, providers may adopt an in-app GRM portal, IVR, WhatsApp channel, or a dedicated call center. A standardized framework is essential in this context to ensure that the system's core features and utility remain consistent across all interfaces.

Our discussions with stakeholders revealed key details about distinct channels and approaches for GRM systems. It also helped us to understand and identify key structural challenges to formal GRM. Public sector banks typically operate centralized, legacy grievance systems that handle high complaint volumes but suffer from weak integration with agent-facing platforms and third-party service providers, limiting real-time visibility and timely escalation. Payments banks generally deploy more integrated digital grievance modules within agent applications, yet often focus on complaint closure rather than deeper analysis of recurring issues. FinTechs, by contrast, tend to use highly integrated, technology-driven systems with rapid resolution cycles, but rely on informal, field-led interventions that backend systems do not capture consistently.

Across all three provider types, we observed that the effectiveness of grievance resolution depends less on the choice of grievance model and more on a set of core system design features. Gaps in system integration, uneven access to channels, fragmented ownership, inconsistent turnaround times, and limited use of grievance data repeatedly constrained performance, regardless of institutional form.

These cross-cutting insights underscored the need for a standardized, diagnostic approach that could be applied across provider types without prescribing a one-size-fits-all model. This helped us design the SCORE framework, which distills these observations into five critical dimensions: System integration, Channels and accessibility, Organizational commitment, Responsiveness, and Empowerment through feedback.

The purpose of this framework is not to prescribe a specific grievance redress model or channel mix. Instead, it helps institutions assess how well their existing systems function in practice, identify gaps in design and implementation, and pinpoint areas that require strengthening. The framework focuses on system performance over institutional form to enable providers to prioritize improvements that enhance accessibility, accountability, and resolution outcomes within their current operating context.

Providers can use the framework to evaluate existing GRM systems, identify specific gaps, and track improvements over time. It can also serve as a guide to design new systems that are responsive, inclusive, and aligned with agent needs. The framework assigns a quantitative scoring value on a scale of 0 to 3 to each of the indicators. This framework supports a structured and comparative assessment across key performance areas.

SCORE framework:




Each indicator in the framework focuses on a critical aspect of agent GRM and is supported by sub-indicators that help assess the provider’s performance in that area:






Figure 3: SCORE framework

The table below describes sub-indicators within each of the key pillars of the framework:




Pillar S: System integration defines how well the GRM is structured and integrated into agent operations.

Indicator 	Description 	Scoring 
Complaint registration	A defined system to raise and register complaints formally	0 = No system to raise grievances 1 = Informal system 2 = Partially formal GRM; for instance, a helpline is available but is not tracked 3 = Comprehensive formal system
Integration	The GRM interface is linked to the agent-facing platform	0 = Standalone functionality 3 = Linked to agent-facing platform

Pillar C: Channels and accessibility describes the available channels and resources to handle agent grievances.




Indicator 	Description 	Scoring 
Access points	Availability of access touchpoints to raise grievances	0 = No access points available 1 = Single access point only; for instance, call center or in-person support 2 = Two access points; for instance, call center and field staff, or app and email 3 = Three or more access points, for example, call center, app, WhatsApp, and in-person support, among others
Agent training	Quality and frequency of training provided to agents on grievance resolution processes and escalation pathways	0 = No training provided 1 = One-time orientation only, which includes basic induction, no follow-up 4 = Comprehensive training, which includes structured onboarding plus regular refresher training, guidance on escalation, and use of grievance resolution tools

Pillar O: Organizational commitment defines the governance structure and degree of provider ownership of the GRM system.




Indicator 	Description 	Scoring 
GRM policy and standard operating procedures (SOPs)	Nuanced and documented BC-specific grievance resolution policy and SOPs.	0 = None 1 = Generic (not dedicated to agents) 3 = BC-specific with escalation matrix
Governance	Provider visibility and control or oversight of agent grievance	0 = No control or outsourced 2 = Limited control but strong oversight control 3 = Complete control

Pillar R: Responsiveness

Defines how well the GRM communicates and builds trust with agents

Indicator 	Description 	Scoring 
Monitoring of TAT for grievance resolution	Defined TAT based on the grievance types	0 = Not defined 1 = Defined not tracked 3 = Defined and tracked
Resolution effectiveness	Percentage of grievances resolved within the TAT	1 = <40% 2 = 40–70% 3 = >70%

E: Empowerment and feedback describes how the GRM strengthens agents’ voice, confidence, and participation in the system.

Indicator 	Description 	Scoring 
Agent satisfaction	The extent to which agents feel their grievances are resolved fairly and respectfully	0 = No satisfaction 1 = Low satisfaction 2 = Moderate satisfaction 3 = High satisfaction
GRM data analysis	Whether grievance data is systematically analyzed to identify patterns, root causes, and recurring issues	0 = No 3 = Yes

The framework serves as a diagnostic tool to help providers assess the effectiveness of their grievance resolution mechanism for agents. Each pillar represents a critical aspect of an effective system that enables providers to identify which elements are well established and which require attention. Providers can gain a comprehensive understanding of the overall GRM landscape through evaluation of performance against these indicators.

For instance, consider a provider where agents can register complaints directly through a dedicated section in the mobile application used for transactions, and a dedicated team oversees escalations. Despite these provisions, complaints are often routed manually through field staff, and agents do not always receive tracking information or updates on redressal timelines. Based on our SCORE framework, this illustrates that system integration and organizational commitment are relatively well established. However, channels and accessibility, and responsiveness, are comparatively weaker. This weakness highlights where the GRM requires further attention to ensure a more balanced and comprehensive system.



Based on MSC’s analysis of our interactions with the providers, we used the SCORE framework to assess how different types of providers perform against each indicator.² For more details on scoring, please see Annexure 1.3.

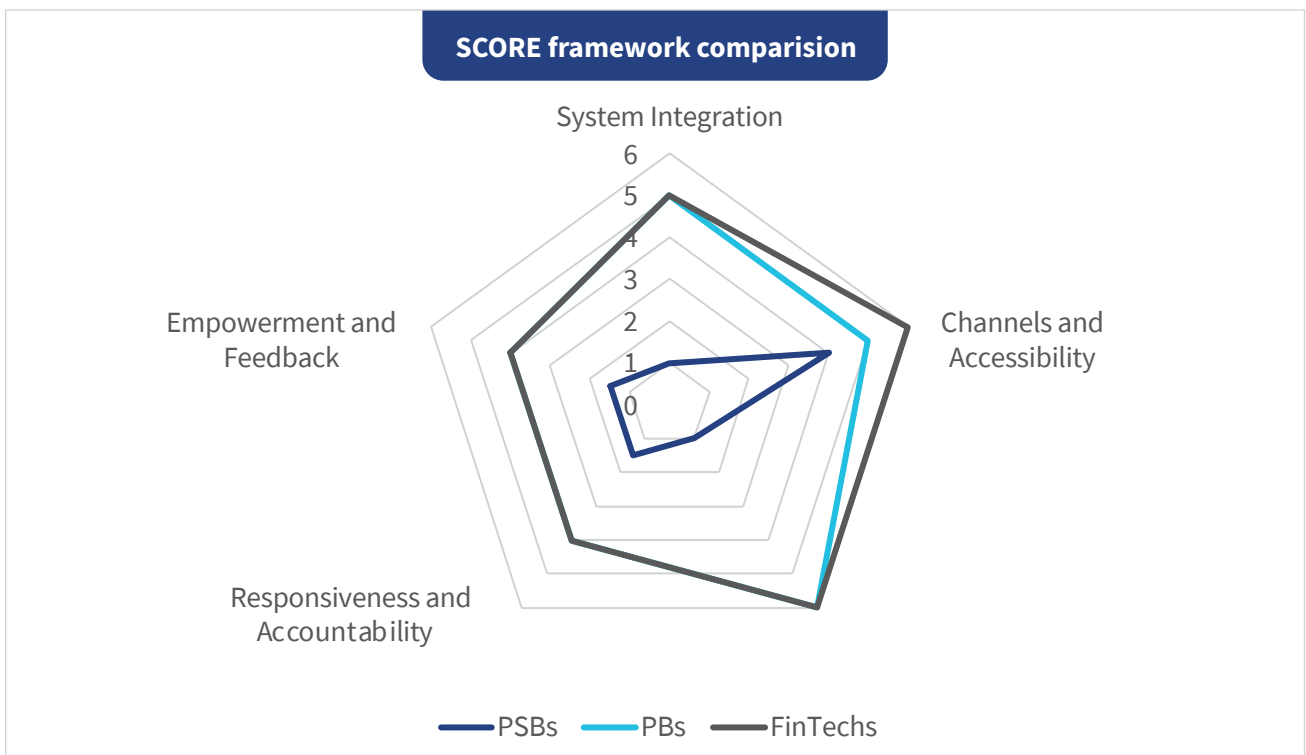


Fig 4: Comparison of GRM systems offered by different providers using the SCORE framework

² The scoring is based on interactions with providers. It does not depict universal scoring, and scores for individual providers may vary depending on the system in place.

As described previously, FinTechs are leading the way in building dedicated, formal grievance redress systems for agents. They stand out because they actively use technology to strengthen how agent complaints are captured and resolved. Several providers have already integrated smart features, such as AI-driven language selection and automated complaint routing to ensure agents receive quick responses in the language they are most comfortable with. Beyond technology, FinTechs maintain strong on-ground engagement. Their field teams stay closely connected with agents to help identify common pain points early and enable faster, more consistent issue resolution.

In contrast, public sector banks rely on centralized and largely legacy grievance systems. While formal channels exist, limited integration with agent-facing platforms often results in slower resolution and weaker visibility into grievance outcomes. Payments banks have invested in digital grievance channels embedded within agent applications and clearer turnaround timelines. However, grievance handling frequently depends on manual coordination and field-level follow-up, which constrains consistency and affects the systematic use of grievance data.

Providers should treat the framework and its results as a dynamic roadmap for improvement. The steps to improve grievance resolution could include different ways to redesign workflows, tighten process protocols, invest in staff or infrastructure, and enhance transparency. Qualitative responses and low scores under certain pillars should prompt deeper diagnosis, which would lead to context-appropriate interventions. The framework is most effective when used periodically. It allows providers to track improvements, respond to evolving needs, maintain high standards of grievance resolution, and build trust with agents.



Banking Transaction
GSTIN OF IPPB (UP)
19AAEC12377M2Z2

India Post
25
Map of India

इंडिया पोस्ट
पेमेन्ट्स बैंक



Chapter 5:

Way forward for the agent GRM system in India



A foundation for agent GRM must be created, even though regulators may not be able to practically address all the challenges at once. Providers should take deliberate measures to make AGRM systems more accessible, consistent, and responsive. This can help build a strong foundation for more accountable and agent-friendly delivery of services over time. A structured approach will be needed to strengthen agent GRM, primarily across three levels: Agents, providers, and regulators or policymakers. Each level will play a complementary role to ensure accountability, responsiveness, and long-term sustainability of the system.

Regulatory level



At the **regulatory level**, agent grievance resolution needs to be embedded within the broader compliance and supervisory frameworks. The Reserve Bank of India (RBI) can help establish clear norms and expectations for providers. Key regulatory actions may include:

1. Establish a unified regulatory architecture for AGRM:

- AGRM requirements should be embedded within the supervisory instructions to eliminate fragmented, informal grievance processes. Embed agent grievance redress requirements explicitly within the [Master BC Guidelines on BC agents](#) and related supervisory instructions, so that providers are required to establish formal, standardized grievance systems and eliminate fragmented or informal grievance processes.

2. Set up standard guidelines to implement and monitor AGRMs:

Detailed guidelines can outline the core features expected in agent-facing GRM systems, such as:

- **Defined grievance categories and standard resolution timelines:** Guidelines can require providers to classify grievances into standardized categories, such as transaction failures, settlement delays, technical issues, conduct-related complaints, and operational support issues. For each category, indicative resolution timelines can be prescribed to set clear expectations, improve monitoring, and reduce prolonged pendency.
- **Formal access channels, such as helplines, digital platforms, and in-branch support:** Providers can be required to offer multiple, well-publicized grievance access channels, including toll-free helplines, digital platforms, such as mobile applications or web portals, and in-branch or field-level support.
- **Tiered escalation pathways and internal review controls:** The guidelines should mandate institutions to have clearly defined escalation levels that specify responsible teams and decision-making authority at each stage. This would help ensure timely resolution, prevent grievances from stalling at the first level, and strengthen internal accountability and supervisory oversight.
- **Guidelines around internal review processes:** The guidelines should outline the process to establish formal internal review mechanisms to periodically assess grievance trends, resolution quality, and turnaround times. This includes management-level oversight, documentation of corrective actions, and use of grievance data to identify systemic issues and inform operational improvements.

3. Report and monitor GRM data across providers:

Guidelines can mandate providers to submit periodic reports on agent GRM, which capture details, such as grievance volume, categories, resolution rates, percentage of unresolved complaints, and escalation trends. Some elements of the report can be published publicly to promote accountability and transparency among providers.

4. Establish a sector-level institutional mechanism:

As a next step, a sector-level institutional mechanism in the form of a self-regulatory organization (SRO) can be established. The RBI should formalize, strengthen, and recognize such SROs. MSC has [advocated for the establishment of SROs and their critical role](#) in enhancing the quality of DFS delivery for the last mile. The SRO can:

- **Support implementation and promote standardization:** The SRO can help providers interpret regulatory requirements and translate them into operational practices. This includes sharing standard reporting templates, data sharing formats, and reference processes for grievance reporting and monitoring.
- **Data gathering and analysis:** Given the existing structure of grievance redress arrangements across the ecosystem, a single, common grievance platform may not be practical at this stage. The SRO should place greater emphasis on strengthening standardized grievance data reporting and analysis across providers. The SRO can collect standardized reports from providers that cover grievance volumes, key issue categories, resolution timelines, and escalation patterns. Over time, this approach can build the foundation for greater coordination and alignment across grievance systems.
- **Oversee the functioning of agent grievance systems:** Through periodic reviews and structured engagements, the SRO can assess if grievance systems are functioning as intended, with a focus on accessibility, responsiveness, and escalation effectiveness rather than individual case outcomes
- **Receive and review periodic provider reports:** The SRO can collect standardized reports from providers that cover grievance volumes, key issue categories, resolution timelines, and escalation patterns. This would support ongoing monitoring and enable early identification of systemic risks.
- **Set operational benchmarks aligned with RBI guidelines:** The SRO can define baseline performance benchmarks, such as indicative turnaround times or reporting standards, to support consistent application of RBI requirements across the sector.
- **Facilitate coordination among providers:** Where agents operate across multiple providers or rely on shared infrastructure, the SRO can enable coordination to address cross-cutting grievances, reduce duplication, and improve the efficiency of resolution.
- **Monitor adherence and highlight non-compliance:** The SRO can track adherence to basic grievance redress norms and escalate instances of persistent non-compliance to the regulator, supporting supervisory effectiveness.
- **Promote knowledge sharing and best practices:** The SRO can act as a forum for sharing good practices, innovations, and lessons learned to help providers strengthen grievance systems over time.

5. Include agent-facing section on the CPGRMS portal:

- A dedicated grievance category can be introduced for BC agents, with sub-categories aligned to a national agent grievance taxonomy (e.g., failed settlements, commission delays, incorrect penalties, operational disputes).
- Agent login can be authenticated on the portal using mobile-based OTP/KYC to verify BC identity and provider affiliation.
- Seamless referral logic can be used to route cases to the concerned provider or supervisory authority based on grievance type. For instance, once an agent logs in to the portal, the system can auto-tag the complaint with the agent ID, provider name, and location. The complaint is immediately routed to the responsible bank/NBFC/FinTech or their BC network manager through an API-based integration.
- The provider would then investigate and submit the resolution status on CPGRAMS. If the provider fails to resolve within the stipulated TAT, the complaint is escalated to the RBI's Consumer Education and Protection Department (CEPD) or the designated supervisory division.
- GenAI can be used to automate and digitize the grievance registration experience for agents. For instance, the system can provide auto-filled agent ID, location, and provider upon login, timely updates on preferred mode via SMS/WhatsApp/portal notifications, and auto-escalation to the next level if the resolution is not offered within pre-defined TAT.

6. Use artificial intelligence to curb instances of fraud and build BC ecosystem resilience:

- The use case for [Digital Payments Intelligence Platform \(DPIP\) API](#) should be expanded to enable better identification and analysis of BC-initiated transactions as a distinct category. To begin with, banks should be mandated to integrate DPIP APIs into their core banking systems. Then BC-facilitated transactions can be tagged as a separate category to allow banks to monitor the performance of BC agents.
- Further, a SupTech tool can ingest DPIP alerts, analyze transaction metadata to automatically flag high-risk agents, detect abnormal transaction clusters, and identify mule-account patterns. For instance, the DPIP API system can auto-tag mule or suspected customer accounts and alert BC agents. It can also alert providers about abnormal agent transaction velocity, unverified transaction locations, repeated biometric mismatch, and suspicious transactions that it can decline. Providers can then regularly generate and review API-based reports to track transaction trends, detect anomalies, and strengthen ongoing monitoring and risk management.
- SupTech can also be used to also aggregate and analyze agent GRM data submitted by providers, which will enable regulators to generate unified dashboards that highlight grievance volumes, categories, ageing, and resolution performance across institutions. SupTech can integrate GRM feeds with DPIP transaction alerts and CPGRAMS escalations to identify emerging risk patterns, detect systemic failures, and benchmark providers on responsiveness and TAT compliance.

Provider level



At the provider level, dedicated systems must be established that treat agent grievances as a distinct operational priority. The following recommendations can be implemented:

- **Formal GRM systems:** Providers should set up **dedicated, agent-focused grievance resolution units** within existing customer support structures. These should include clear categories, standardized resolution timelines, and escalation mechanisms.
- **AI enabled chatbot:** Providers should invest in AI-enabled chatbots to address routine agent queries. Recurring issues and frequently raised concerns can be analyzed and trained into the system as standard responses, with regular updates from providers. The chatbot can be launched on the agent-facing device or on WhatsApp. This would enable agents to get quick clarifications without registering queries as grievances and in the process reduce the overall grievance load and associated costs.
- **Technology integration:** Providers can embed grievance management modules within agent-facing apps to allow seamless complaint registration and tracking. For example, [PayNearby](#), [Pay1](#), and [Airtel Payments Bank](#) have integrated agent query handling within their platform to improve responsiveness.
- **Monitoring and analytics:** Providers can regularly analyze grievance trends, such as downtime frequency, payment delays, fraud cases, and address root causes. This data can also inform product redesign and liquidity management tools.
- **Transparency:** Providers can share grievance resolution metrics, such as resolution timelines and escalation outcomes, with agents. This builds trust among agents and customers, who rely on agents for grievance redressal.
- **Capacity building:** Providers can train field staff and managers to handle complaints consistently and within defined turnaround times (TATs).

Agent level



Finally, at the agent level, the critical step is to empower agents with awareness and access. The following actions are critical to ensure agents can use the GRM system effectively:

- **Awareness and training:** Agents should be trained in the effective use of GRM channels, which include escalation pathways and rights under formal grievance systems. Periodic refresher training on GRM processes is necessary to sustain agent awareness over time, particularly in contexts of agent turnover and evolving grievance procedures. [Evidence from CGAP \(2022\)](#) highlights that limited awareness often does not allow agents to raise valid concerns.
- **Accessible tools:** Agents should have access to simple, multilingual channels, such as helplines, IVR, WhatsApp, app features, and offline grievance forms, to register issues without the knowledge of advanced digital skills.

- **Feedback loops:** Regular feedback forums, such as monthly meetings, surveys, and digital polls should be available for agents to voice systemic challenges.
- **Protection and empowerment:** Non-retaliation policies should be established so agents can escalate grievances without fear of penalties from providers.

Sustained attention is needed at the regulatory and institutional levels to strengthen agent grievance resolution. While individual efforts by providers are important, progress depends on system-wide alignment, clear standards, and accountability across the ecosystem.

The measures outlined here, which include regulatory mandates and the establishment of an SRO, are not endpoints. Instead, they mark the initial steps toward a more responsive system. Their effectiveness will depend on consistent implementation and alignment with the operational challenges agents face on the ground. Close coordination among stakeholders, such as regulators, providers, and support institutions, will be essential to build a grievance resolution framework that is fair, responsive, and resilient.

Annexure



1.1 Methodology

The assessment followed a mixed-methods approach that integrated primary evidence, secondary documentation, and structured analytical review. Primary insights were gathered through interviews and consultations with over 100+ agents, field supervisors, provider staff, and industry stakeholders to understand current grievance-handling practices, escalation behaviors, and system-level gaps. These insights were complemented with observations from field visits across selected locations, including Uttar Pradesh, Delhi, Tamil Nadu, Rajasthan, and Odisha.

Secondary data included provider operating guidelines, agent support manuals, escalation matrices, existing GRM protocols, and available operational data related to agent complaints, turnaround times, and service performance. Relevant global and national frameworks on grievance redressal were also reviewed to benchmark standards and identify good practices.

The analytical process involved mapping the existing grievance-resolution workflow, assessing the degree of system formalization, and evaluating alignment with established principles of accessibility, responsiveness, confidentiality, and accountability.

We triangulated the insights across consultations, field perspectives, and secondary sources to validate findings and ensure they reflect real agent experiences. This approach helped us strengthen the recommendations and inform the development of the SCORE framework, grounding it in operational realities.

1.2 Limitations of the study

Although the study uses a mixed-methods approach and triangulates evidence across interviews, field observations, and document reviews, a few methodological limitations should be acknowledged to contextualize the findings.



Geographic and provider coverage: The assessment was conducted in selected districts and with a limited set of providers. Agent operations vary widely across states, ecosystems, and operating models, so the findings may not fully represent the diversity of grievance-handling practices nationwide.

1



Reliance on self-reported information: Primary insights were based on the experiences shared by BC agents, CBCs, and provider staff. These accounts may be affected by recall gaps, personal interpretation of grievance processes, or hesitancy to share negative experiences, which could influence the accuracy or depth of certain insights.

2



Variability and gaps in GRM data: Providers maintain grievance records in different formats, and in many cases, data were incomplete, not standardized, or not disaggregated at the agent level. These inconsistencies limited the ability to conduct a more robust quantitative analysis of complaint volumes, turnaround times, and resolution patterns.

3



Evolving systems and recent improvements: The study reflects grievance-handling practices during a specific period. Several providers were in the process of upgrading internal systems, piloting new tools, or revising guidelines, which may not be fully captured in this assessment.

4

Limited visibility into field-level escalation pathways: While the study examined formal processes, informal escalation routes used by agents in practice depend heavily on local staff capacity, network relationships, and on-ground realities. These informal channels are often undocumented, making it difficult to fully assess their effectiveness or consistency.

5

1.3 Using the SCORE framework

The SCORE framework is applied by assessing provider performance across five dimensions—System integration (S), Channels and accessibility (C), Organizational commitment (O), Responsiveness (R), and Empowerment and feedback (E). Each dimension consists of defined sub-indicators, which together capture the core elements of an effective agent grievance redress mechanism (GRM).

Scoring approach

Each sub-indicator is assigned a score ranging from 0 to 3 based on the specified criteria. Sub-indicator scores are aggregated to generate a pillar-level score for each SCORE dimension (S, C, O, R, and E). These pillar-level scores are then combined to derive an overall SCORE, representing the provider’s aggregate GRM maturity.

Interpretation of pillar-level scores

- Scores of 0–1 indicate informal, fragmented, or weakly implemented GRM practices, with limited accessibility, tracking, or accountability.
- Scores of 2 reflect partially formalized systems where basic structures exist but integration, consistency, or monitoring remain limited.
- Scores of 3 indicate mature, well-integrated, and actively managed GRM systems supported by clear governance and performance tracking.

Interpretation of the overall SCORE

The overall SCORE provides a consolidated view of the provider’s GRM maturity across all five dimensions.

- A low overall SCORE suggests that grievance handling is largely ad hoc, dependent on manual or informal processes, and prone to delays, inconsistencies, and agent dissatisfaction.
- A moderate overall SCORE indicates that foundational GRM elements are in place, but gaps persist across one or more dimensions, limiting system effectiveness and agent trust.
- A high overall SCORE reflects a comprehensive and well-functioning GRM system that is integrated into agent operations, accessible through multiple channels, responsive within defined timelines, and used as feedback and learning tool.



S: System integration

Types of providers or pillars	Complaint registration	Integration	Total
PSBs	Score: 1 Largely informal; common channels exist, but not agent-specific, some routed only to TSP with no visibility	Score: 0 No true integration with agent-facing app (only technical complaint routing in some cases)	1
PBs	Score: 2 Helpline + app-based registration; manual follow-ups are still common	Score: 3 App-based grievance resolution integrated with the transaction app	5
FinTechs	Score: 2 Field staff and formal system, though consistency varies	Score: 3 App-based ticketing integrated with agent platforms in many cases	5

C: Channels and accessibility



Types of providers or pillars	Access points	Agent training	Total
PSBs	Score: 2 IVR, email, multiple generic websites; not designed for agents specifically	Score: 2 Largely managed by CBCs; orientation provided, but no focus on GRM specifically	4
PBs	Score: 3 Multichannel: Helpline, app, field staff, printed guides	Score: 2 Orientation during onboarding through printed guides, posters; no evidence of refreshers	5
FinTechs	Score: 3 Multichannel: Helpline, app, WhatsApp, email, and field staff	Score: 3 Regular training on ways to resolve and manage agent grievances	6



O: Organizational commitment			
	GRM policy and SOPs	Governance	Total
PSBs	Score: 1 Generic GRM, not agent specific	Score: 0 No visibility or control when routed to the TSP	1
PBs	Score: 3 Exists; BC or agent-specific SOPs with escalation	Score: 3 Oversight and control over GRM with the provider	6
FinTechs	Score: 3 Exists; structured SOPs with escalation	Score: 3 Provider-controlled GRM with staff + digital systems.	6

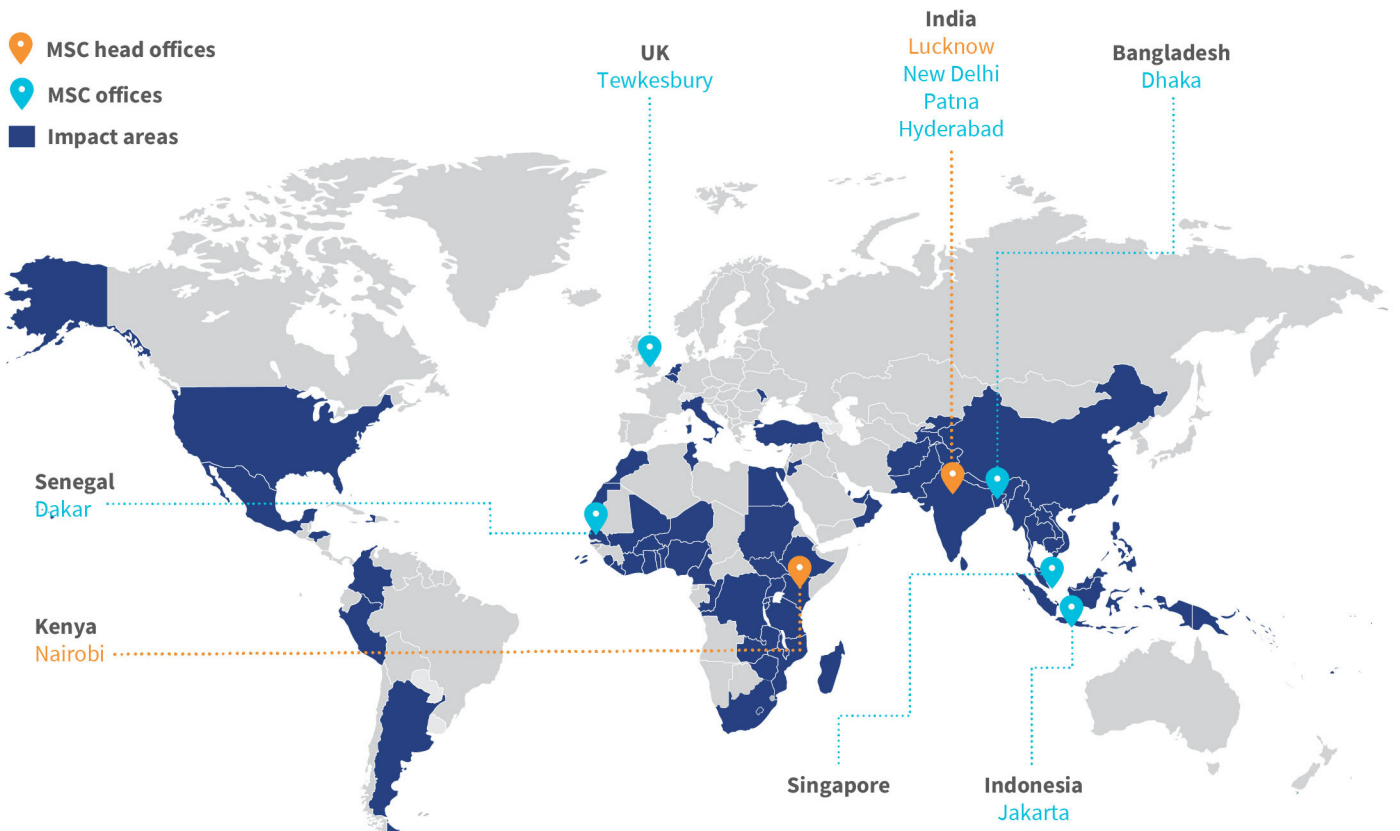


R: Responsiveness and accountability			
	Grievance TAT monitoring	Resolution effectiveness	Total
PSBs	Score: 0 Not defined for agents	Score: 1 Low (<40%), complaints are often delayed or lost	1
PBs	Score: 2 Some TATs are defined and communicated, not always tracked	Score: 2 Moderate (~60%); manual follow-ups delay some cases	4
FinTechs	Score: 2 Routine operational issues are resolved fast; complex issues are tracked with tickets	Score: 2 Moderate (~60–80%); routine issues are quick	4



E: Empowerment and feedback			
	Agent satisfaction	GRM data analysis	Total
PSBs	Score: 1 Low, long delays and lack of visibility	Score: 0 Not done	1
PBs	Score: 2 Moderate; better with app or helpline, weaker where dependent on field staff	Score: 2 Done to some extent; some providers track patterns	4
FinTechs	Score: 2 Moderate; satisfaction is higher for quick fixes; variable across providers	Score: 2 Done to some extent; analysis used by some FinTechs	4

- 📍 MSC head offices
- 📍 MSC offices
- Impact areas



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