



How to conduct Client Protection Self - Assessment

What is CP self – assessment?



- It is an assessment conducted internally by the institution staff
- It identifies good practices and challenges in the CP principles' implementation



What is Client Protection



There are seven Client Protection Principles which describes minimum good practice to not harm the client:

1. Appropriate product design and delivery
2. Prevention of over-indebtedness
3. Trans
4. Responsible pricing
5. Fair and respectful treatment of clients
6. Privacy of clients data
7. Mechanisms for complaint resolution





CP Self Assessment Objectives

- Become familiar with CP
- Identify Institutions strength and gaps in implementation of Client Protection standards

4 Basic steps



1. Preparation
2. Gather documentation
3. Identify and analyze strengths and weaknesses
4. Prioritize problems and develop a plan

Step 1: Preparation



1. Get familiar with the CPP principles and assessment tool
 - The assessment tool with short video showing how to use it is available here
 - The pp presentations explaining CPP are available here
 - The Operations Manual explaining how each CPP fits into MFI operations is available here

Step 1: Preparation



2. Orient the staff and form a team

- Assign a person (preferable senior manager such as Internal Auditor, SPM champion, Product development Manager) responsible for the process - Champion
- Identify key persons who can provide information and assess: Director, HR manager, Operations, Risk Manager, Marketing, Credit Manager, 1-2 branch managers,
- Explain the purpose of assessment and provide basic information about CP to the team

Step 2: Gather documentation



1. Identify available policies and internal guidelines

2. Conduct desk review of key documents such as:

- » HR manual
- » Code of Conduct
- » Credit Manual
- » Collection Policy
- » Anty-Discrimination Policy
- » Privacy Policy
- » MIS/IT policy
- » Loan Application

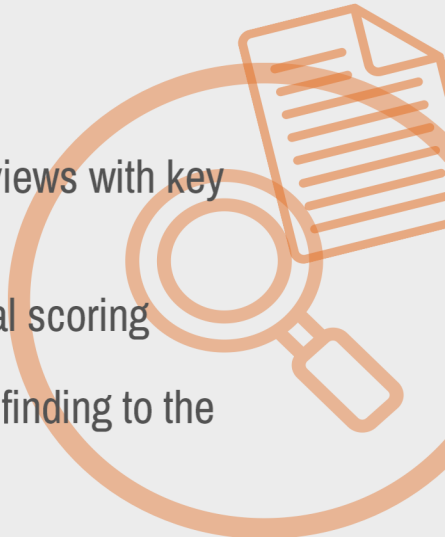
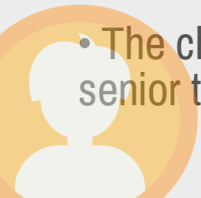


Step 3: Identify and analyze strengths and weaknesses



Option 1:

- The champion conduct interviews with key managers
- The champion conducts initial scoring
- The champion present initial finding to the senior team



Step 3: Identify and analyze strengths and weaknesses



Option 2:

- Each team member assess the institution practice against CP standards individually
- Champion summarize the findings
- Champion presents the results



Step 3: Identify and analyze strengths and weaknesses



Option 3:

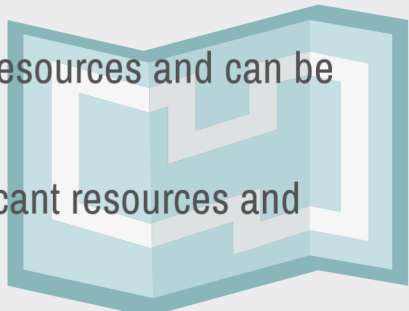
- Organize team meetings where the whole team discuss and jointly assess institution practice against the CP standards
- The Champion plays the role of the facilitator



Step 4: Prioritize problems and develop a plan



- What are the areas where you see opportunities for increased compliance (where you scored partial compliance)?
- Which improvements would you like to implement within next 6 months, 12 months?
- What changes requires little resources and can be done quickly?
- What changes requires significant resources and time?



Step 4: Prioritize problems and develop a plan



What will I need to do to make changes happen?

1. Get institutional buy-in
2. Securing required resources
3. Setting an implementation team
4. Developing a detailed plan
5. Monitoring the implementation
6. Providing support



What next?



- Share self assessment with MFC
- Share your implementation plan with MFC
- Start implementing your plan



Where to get information and support?



If you have any questions please do not hesitate to contact MFC staff:

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