e-MFP BRIEF SERIES

The Universal Standards for Social Performance Management – Where do we go from here?

Brief No. 7

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EUROPEAN MICROFINANCE PLATFORM
NETWORKING WITH THE SOUTH

ABOUT THE EUROPEAN MICROFINANCE PLATFORM

The European Microfinance Platform (e-MFP) is the leading network of organisations and individuals active in the microfinance/financial inclusion sector in developing countries. It numbers over 130 members from all geographic regions and specialisations of the microfinance community, including consultants & support service providers, investors, multilateral & national development agencies, NGOs and researchers. Up to two billion people remain financially excluded. To address this, the Platform seeks to promote co-operation, dialogue and innovation among these diverse stakeholders working in developing countries. e-MFP fosters activities which increase global access to affordable, quality sustainable and inclusive financial services for the un(der)banked by driving knowledge-sharing, partnership development and innovation.

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UNIVERSAL STANDARDS FOR SOCIAL PERFORMANCE MANAGEMENT – WHERE DO WE GO FROM HERE?

The Making Microfinance Investment Responsible (MIR) Action Group was created by e-MFP members in 2008 to develop and promote a harmonised framework for investors in microfinance to pursue their social strategy. MIR Action Group was very active between 2008-2012, publishing five briefs (available on the e-MFP website[1]). In 2017, the group reconvened to take stock of what had been done and what we still needed to do to make microfinance investment responsible.

A significant development in the financial inclusion sector was the 2012 launch of the Universal Standards for Social Performance Management ("Universal Standards"), and their update in 2014. The Universal Standards unite the microfinance sector around a set of client-centered and responsible business management practices, and they have been disseminated throughout the microfinance ecosystem. Many stakeholders have worked assiduously to promote, disseminate and train on them. These efforts have been spearheaded by organisations like CERISE[2], Microfinance Centre (MFC)[3] and Social Performance task Force (SPTF)[4], with instrumental funding support from Agence Française de Développement (AFD), Ford Foundation and the Liechtenstein Development Service (LED), but were also made possible by the hundreds of financial service providers, country networks, technical assistance (TA) providers, consultants, investors and other stakeholders worldwide who have decided to adopt this framework. By 2015, a survey conducted by the SPTF—the multi-stakeholder membership organisation that facilitated the "bottom-up" development of the Universal Standards—revealed that 91% of respondents were aware, familiar, or very familiar with the Universal Standards and 74% stated that the Universal Standards influenced the implementation of Social Performance Management (SPM) practices in their institutions. As of September 2018, approximately 570 financial service providers[5] (FSPs) had assessed themselves against the Universal Standards at least once using the CERISE-SPI4, the audit tool for the Universal Standards. Thousands of consultants, TA providers, and university students have been trained on the Universal Standards and about 20 Microfinance Investment Vehicles (MIV), asset managers, Development Finance Institutions (DFIs) or foundations have adopted SPI4-ALINUS, a subset of the SPI4 for social due diligence.

This brief aims to distill lessons from these efforts and asks what we have learned from the last five years (2013-2017). It draws on feedback from trainings, audits, and upgrade projects conducted under the two funding facilities created to promote responsible finance: the Social Performance Fund (SP Fund) and the Responsible Microfinance Facility (RMF). It also draws on responses from online surveys conducted by CERISE in early 2018 with 22 FSPs, 12 investors, 80 SPI4 qualified auditors[6] and 7 national networks[7]. In addition, the analysis

Box 1: Social Performance Fund

The Social Performance Fund managed by MFC, with support from CERISE and funded by Ford Foundation, was created in 2010. The third round, launched in October 2015, focused on promoting the Universal Standards among FSPs and supporting their efforts to integrate social performance management fully into their operations by sharing practical experience and providing useful technical resources, notably the SPI4 tool.

SP Fund activities included the following :

- 26 awareness raising events: one-day sessions to present SPI4 or SPI4-ALINUS and share user experiences, linked to national and regional events
- 33 SPI4 Social Audit "Plus" projects with FSPs, which involved an SPI4 audit plus development of a detailed action plan based on the audit findings to improve policies and procedures.
- 12 SPI4 audits by national networks, to identify areas for improvement where networks can work with their members
- 12 country reports written by national networks, to share with investors and/or regulators in order to increase sector transparency. 190 financial institutions provided data for these reports

See a summary of all 3 rounds of SP Fund activities on MFC's website (http://mfc.org.pl/social-performance-fund-3-round-infographic-summary/). The SP Fund concluded its activities in March of 2018.

1 http://www.e-mfp.eu/actions-groups/making-microfinance-investment-responsible
2 http://www.cerise-microfinance.org/
3 http://mfc.org.pl/
4 https://sptf.info/
5 See the list of audited FSPs at cerise-spi4.org under "Benchmarking"
6 CERISE offers an auditor qualification process for those who are interested in validating their audit skills in order to oversee or accompany SPI4 audits.
7 3 networks from Europe, Central Asia, 2 from Latin America and 2 from South East Asia.

integrates feedback from investors at the SPTF Social Investor working group meetings (India, February 2018 and Luxembourg, June 2018), on how in general the Universal Standards can shape and strengthen investors' operations and strategies for responsible investment. CERISE, MFC and SPTF have coordinated the analysis, based on their direct involvement in the management or support of SPI4 users.

Box 2: Responsible Microfinance Facility

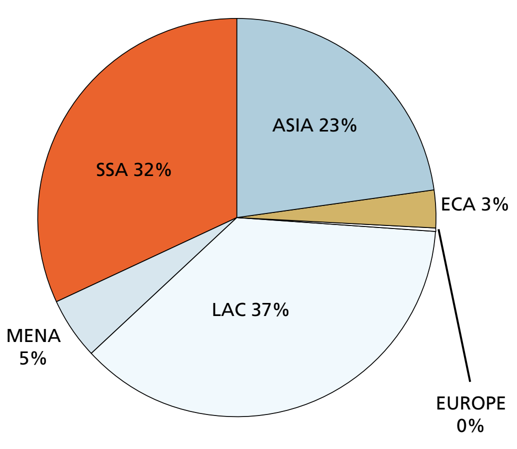
The Responsible Microfinance Facility (RMF) managed by SPTF and the Smart Campaign and funded by Agence Française de Développement, was set up in 2015 to strengthen the social performance management practices, including client protection practices, of financial service providers in sub-Saharan African (SSA) and the Middle East and North African (MENA). The Facility organises several different types of trainings, notably a three-day introduction to SPM that includes a module on the SPI4 tool, and co-finances different types of projects implemented by FSPs, including SPI4 Plus projects. As of June 2018, the RMF had co-financed 29 SPI4 Plus projects. FSPs have used the "plus" element of these projects not only to create action plans, but also to train key staff and senior managers on the SPI4 and to initiate improvements to management practices. The RMF will continue its activities through 2021.

LESSON 1: WE SEE WIDE ADOPTION OF THE UNIVERSAL STANDARDS, BUT WITH SOME REGIONAL DIFFERENCES

The first question in this analysis was "Just how 'universal' are the Universal Standards today?" In other words, to what degree have stakeholders in the financial inclusion sector adopted them?

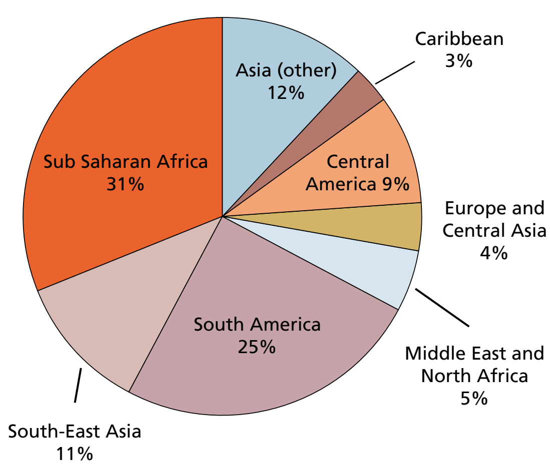
We can first look at the outreach numbers for the CERISE-SPI4, which is the audit tool that measures practices against the Universal Standards. While we recognise that assessing performance is not the same as actually implementing operational improvements, this brief nonetheless considers organisations that have used the SPI4 to have "adopted" the Universal Standards, since use of the SPI4 requires more than simple awareness. Any such organisation is familiar enough with the Universal Standards to know about the SPI4 tool and curious enough about its own practices to evaluate them. We can also look at adoption from the standpoint of investors. For this, the analysis identifies which investors are using the Universal Standards in their due diligence or monitoring procedures. We can refer to numbers of FSPs that investors have assessed with the SPI4-ALINUS tool, the subset of SPI4 indicators selected by investors for social due diligence, and the number of investors who are active in the SPTF Social Investor Working Group.

SPI4 audits conducted by region



Source: data from CERISE SPI4 database, September 2018

SPI4 audits conducted by sub-region



Source: data from CERISE SPI4 database, September 2018

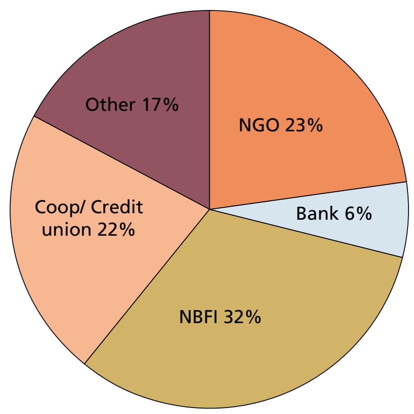
So what do the numbers tell us about who is actually using the Universal Standards?

Firstly, adoption of the Universal Standards is observed all over the world (SPI4 used in 88 countries). As of September 2018, SPI4 had been downloaded 5715 times (since 2015). CERISE knows of 570 completed SPI4 audits (and estimates many more have been completed), 437 of which are captured in the CERISE SPI4 database. There is particularly strong use of the SPI4 in Latin America (LAC), Sub-Saharan Africa (SSA), and Asia, but less so in Eastern Europe and Central Asia (ECA) and the Middle East and North Africa (MENA). In Western Europe so far, the framework of the Universal Standards is not adopted (only 2 MFIs), probably because the European Code of Good Conduct serves as a framework for many microfinance providers in this region.

We observe that SPI4 use is not limited to certain types of FSPs. The table below shows the diverse legal forms of FSPs that have filled out an SPI4.

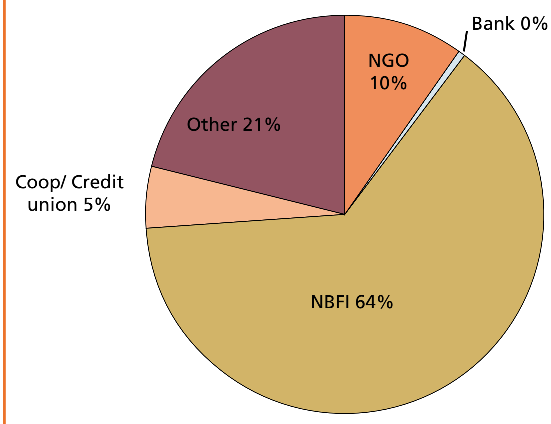
Among FSPs that have completed a SPI4-ALINUS, we find a larger representation of NBFIs, a preferred status for investors.

SPI4 audits conducted by type of FSP



Source: data from CERISE SPI4 database, September 2018

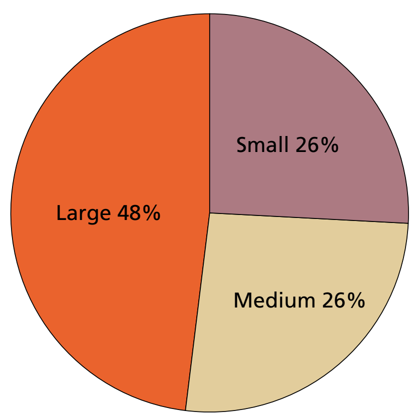
SPI4 ALINUS audits conducted by type of FSP



Source: data from CERISE SPI4 database, September 2018

There is a tendency for larger institutions to be using the Universal Standards, measured by size of the gross loan portfolio. But if we consider scale in terms of outreach, defined as number of active borrowers, then there is greater adoption by small institutions.

SPI4 audits conducted by Gross Loan Portfolio size of FSP

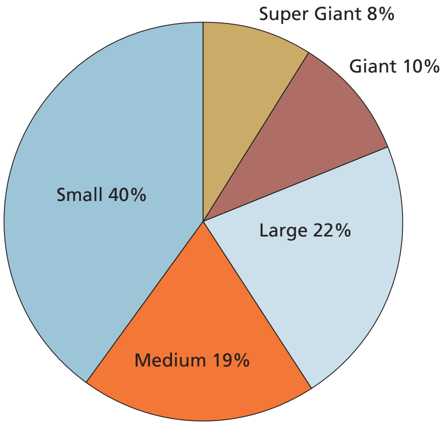


Source: data from CERISE SPI4 database, September 2018

Scale categories (Gross loan portfolio, in USD)

- *Large: Africa, Asia, ECA, MENA > 8 million; LAC > 15 million*
- *Medium: Africa, Asia, ECA, MENA 2 million to 8 million; LAC 4 million to 15 million*
- *Small: Africa, Asia, ECA, MENA < 2 million; LAC < 4 million*

SPI4 audits conducted by outreach size of FSP (outreach = number of active borrowers)



Categories

- *Super Giant: Number of Borrowers ≥ 250,000*
- *Giant: Number of Borrowers ≥ 100,000 and ≤ 250,000*
- *Large: Number of Borrowers ≥ 30,000 and ≤ 100,000*
- *Medium: Number of Borrowers ≥ 10,000 and ≤ 30,000*
- *Small: Number of Borrowers < 10,000*

Source: data from CERISE SPI4 database, September 2018

Adoption does not necessarily mean strong implementation of all of the practices in the Universal Standards, however. Alignment with the Universal Standards is not an easy path; the average SPI4 score for the database of 326 high quality audits (excludes self-assessments) is 65.5%. All regions have room to improve.

The regions where the average audit scores are the lowest—Sub-Saharan Africa, MENA, South East Asia and Central America and the Caribbean— are specifically the focus of the RMF (see Box 2) and two new facilities recently developed, managed by the SPTF (Responsible Inclusive Finance Facility-Southeast Asia and Responsible Inclusive Finance Facility-Central America and Caribbean)[8].

Regions where responsible finance standards have been embraced by regulators stand out (high scores in Europe and Central Asia (ECA) and South America) as does Asia, which includes the South Asia sub-continent where self-regulation for responsible finance has rallied FSPs and their boards, investors, country networks and TA providers.

Average score by sub-region (September 2018)	Number of high quality audits	Average score out of 100%
Europe and Central Asia	12	78.6%
Asia (other)	39	74.8%
South America	82	71.5%
Central America	29	66.5%
Caribbean	9	65.6%
Middle East and North Africa	17	65.0%
South-East Asia	35	64.6%
Sub Saharan Africa	103	55.9%
Total	**326**	**65.5%**

Observations on level of adoption

The existence of **funding facilities** for training and audits has clearly increased awareness in regions like Sub-Saharan Africa (targeted by RMF), but also in countries like Pakistan, the Philippines, Bolivia, and Argentina, which have received support from the Social Performance Fund (see Box 1). Still, the increased awareness has not necessarily translated into implementation. *"Awareness and level of interest have both been improving over the years, but most FSPs still do not understand the importance of integrating social performance in their strategic objectives and do not see the link between social performance, risk mitigation and financial performance"* explains a qualified auditor working in Africa.

8 Like the RMF, the Responsible Inclusive Finance Facility for Southeast Asia (RIFF-SEA) (supported by the Government of Luxembourg) and Responsible Inclusive Finance Facility in Central America and Caribbean (RIFF-CAC) (supported by the Swiss Development Cooperation and the European Investment Bank/Government of Luxembourg) are regional facilities that promote improved social performance management by organising trainings for all types of stakeholders and offering co-financing to FSPs.

Country networks (i.e., microfinance associations) have played an important role in disseminating the Universal Standards, through awareness raising, training of local auditors as well as SPI4 audits and SPM reporting. Indeed, we can observe that in countries where no leading actors promote SPM (e.g., Uruguay, China) the level of awareness is lower at the FSP level as measured by SPI4 conducted.

Regulators have been influential, in countries such as Philippines, Ghana, Nicaragua or Bolivia, where one can observe increasing demand given new regulations in the financial sector that mandate reporting by FSPs on corporate social responsibility or social performance indicators. In the Philippines for example, the network perceives *"high level of interest among microfinance NGOs due to the law recently passed that imposes social performance standards. These SP standards are mainly culled from the Universal Standards. As such, demand for training and TA on the Universal Standards is high. However, other types of FSPs - such as rural banks and credit cooperatives - have a low level of interest in and awareness of the Universal Standards."* Similarly, in the ECA region when regulators decided to introduce new regulations related to the client protection portion of SPM, there was high interest observed among microfinance institutions for assessments and assistance. The same trend can be seen in Nicaragua.

Investors can be important actors. Their efforts to collect social performance data from FSPs using the SPI4 or SPI4-ALINUS as part of due diligence, regular monitoring and reporting have raised awareness on the Universal Standards and social performance management more broadly. However, *"while investors are now well aware of the Universal Standards, their local staff do not always promote them very actively"* observes one stakeholder. Clarifying how the Universal Standards align with a fund's overall investment strategy, and implementing internal staff trainings for investment officers, remain important steps.

In regions where adoption is lower, it may be due to perceptions that the Universal Standards are related to social impact, rather than client centricity and responsible business practices. *"There is a perception that SPM is about social impact: Interest is average because a lot of FSPs are highly profit-oriented"* explains an auditor from East Africa. Moreover, in the ECA and South Asia regions, the focus has been on client protection for reasons relating to regulation, sector upheaval, and risks linked to growing competition. *"To some extent, the Client Protection Principles (CPP) are considered enough to showcase client centricity,"* observes one auditor who works in Asia and Africa. This is echoed by another South Asia-based auditor *"The CPPs are more in demand as there has been a push on this by investors and country associations. Some investors also require that SPM be implemented, but most are ok with the CPPs."*

While investor prioritisation of the Universal Standards has led to positive new engagement with and improvement of SPM, there is a flip side. The push from investors has led some sector players to see the Universal Standards as investor-driven and not something with intrinsic value for an FSP. One respondent states that *"as credit unions do not use external/donor funds for lending, they have less incentive to be seen to be using the Universal Standards and applying SPM."* An auditor from India shares that *"in my country, the Universal Standards have been wrongly perceived as a run-of-the-mill social activity that needs to be ticked off in the interest of coming across as socially responsible to the outside world."* The sentiments of "doing it for the investor" are echoed by an auditor who works mostly in Africa: *"The awareness has improved compared to previous years. But the financial institutions usually consider it as something they have to show externally to attract partners. It is perceived as a non-priority domain [that] MFIs come to when [they are] pushed by external parties or when financing facilitates implementation."*

We should note that this perception of using the Universal Standards to "tick the box" for investors does not play out in other parts of survey responses. For example, we will see in the section below that investors are <u>not</u> the primary source of information on the Universal Standards (national networks are). Moreover, the majority of FSPs surveyed (17 of 22) say they use SPI4 results <u>internally</u>, first and foremost (i.e., presenting to management, to the Board or creating an action plan). Only 8 used results to present to investors, which is something, from the investor standpoint, that could be improved! Finally, as we'll see below, many FSPs clearly <u>do</u> find intrinsic value in the Universal Standards and SPM for reasons entirely unrelated to their investors.

But the perception that the Universal Standards are investor-driven is important to consider. On the one hand, it confirms what this working group has hoped to be the case: investors are important drivers of dissemination and raising awareness. But, it also suggests that the bottom-up, collaborative and multi-stakeholder approach that has characterised the emergence of the Universal Standards is not sufficiently understood and communicated. Investors did not create the Universal Standards. They participated, among many other stakeholders. They promote them, though, because they believe in the advantages and synergies of social and financial performance and their intrinsic value for FSPs. There is a need to amplify this message with FSPs. Says one respondent, *"I believe that the advantages of the implementation of the Universal Standards have not been sufficiently disseminated yet."*

Takeaways

- Well-funded promotion efforts by credible sector stakeholders are key for paving the way for FSPs to take the SPM journey. FSPs take action to improve their SPM in particular in response to regulatory requirements and/or to investor interest.
- The creation of regional facilities that promote and co-finance SPM does broaden and deepen engagement with SPM.
- FSPs that have evaluated their practices using the SPI4 tool are in the majority of cases doing so for internal management. The audit results not only inform management of gaps, but also help the board understand next steps to address those gaps.
- Country context and sector trends influence uptake considerably. This doesn't mean dissemination efforts should avoid markets where microfinance is highly commercial but, for example, communication could be adjusted to the concerns and focus of each type of provider.
- FSPs that are highly commercial or entirely self-funded generally perceive the Client Protection Principles as the minimum set of standards for FSP in inclusive finance, but their interest in the "do-good" aspects of SPM, in the absence of investor or regulatory pressure, is generally low.
- There is a need to intensify communication around the bottom-up emergence of the Universal Standards, and the business case for social performance, with testimonies coming from the FSP's themselves.

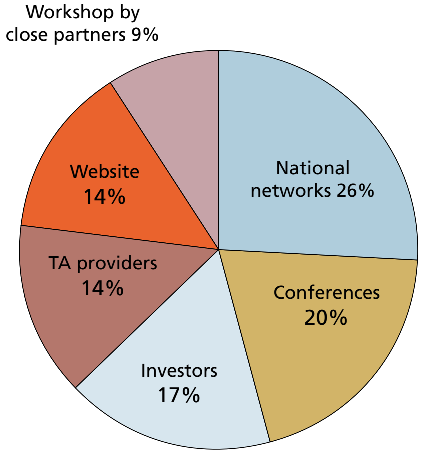
LESSON 2: SPM IS A JOURNEY BEST DONE IN THE COMPANY OF OTHERS

The Universal Standards are considered a helpful source of good practices for aligning operations to social goals and for guiding a social responsibility strategy, but survey respondents also point out that adoption and implementation is a long process. It is a journey, and one that is easier if it is not walked alone. As CEVI, an FSP in the Philippines explains, *"External stakeholders played a huge role in CEVI's learning curve on SPM."*

The **role of external stakeholders is key** from the beginning of the journey: the awareness raising phase. FSPs have many different sources for information on the Universal Standards, but as the graph below shows, country networks are the primary source, followed by conferences. A second important part of the journey is training, to deepen understanding. In this, country networks have again been instrumental in helping FSPs get on the SPM path. But, it doesn't happen overnight. Pakistan Microfinance Network, for example, started in 2008, and says *"it took about 10 years to get a good level of awareness and understanding."*

Yet while country networks are well placed to introduce FSPs to the Universal Standards, and even support their members in conducting audits, few have the capacity to provide the TA FSPs want to make operational changes. For FSPs that are ready to implement improvements—admittedly the hardest part of the journey—the availability of a qualified group of local consultants is a huge asset for cost-effective, contextually relevant and efficient TA. Unfortunately, we still observe a **paucity of qualified local consultants** in many countries. Finally, for FSPs that are ready to prove and report their strong levels of SPM, **rating agencies are critical** external stakeholders.

Source of information for FSPs on the Universal Standards



Source: CERISE-MFC-SPTF survey results, Feb 2018

Investors and international networks are particularly effective pathfinders. Many FSPs have taken an interest in the Universal Standards after realising that a growing number of potential funders look at social performance as part of the due diligence process. This is good news for the members of the MIR Action Group, whose goal has been to align investor approaches to social performance in order to mainstream SPM. Indeed, as we've seen above, an increasing number of investors are using the Universal Standards and CERISE-SPI4 ALINUS indicators in their due diligence and monitoring (investors using ALINUS went from 4 in 2016 to 17 by mid-2018). Nonetheless, there is room for improvement when it comes to harmonising the social performance analysis of investment officers and embedding SPM in relationship management.

In addition, external support from partners can be usefully leveraged to build buy in. *"The positive attention that we have received from Opportunity International [with the use of SPI4 and the Universal Standards], which has promoted OBS as an exemplary network member, was a big help,"* says the SPM Champion of Opportunity Bank Serbia.

Takeaways

- External stakeholders—country networks, consultants, investors, rating agencies—all play a role in promoting the Universal Standards. Country networks in particular can be effective sources of information, training, promoting and even conducting assessments, but for them to have this capacity, long-term commitment is a necessity and in most cases external funding support is as well.
- There is a lack of qualified local consultants to support SPM implementation. More must be done to coordinate efforts to build up SPM expertise locally, integrate the framework of the Universal Standards in current TA supports and to train a consultant pool to support FSPs who want to make operational changes.

LESSON 3: SPM IS A JOURNEY THAT FSPS AND THE STAKEHOLDERS WHO SUPPORT THEM FIND WORTHWHILE

The SPM journey takes commitment and is not without obstacles (next section), but stakeholders in the inclusive finance sector find it worth their while.

Users find it extremely helpful to have a well-developed and structured framework that serves as a **common basis for understanding and talking about good practices** in SPM. *"For small organisations with low level of resources, the standardisation of norms allows for easy appropriation, and facilitates external reporting,"* points out a European investor. The Universal Standards are helpful in that they *"serve as checklist of best practices where we can compare our own practices and priorities,"* explains an FSP in Asia. They also serve to identify microfinance as a distinctive sector: *"Applying one core group of standards among FSPs makes the sector perceived as really being one, socially-driven, and fundamentally different from the banking sector,"* observes a national network.

The international identification of the Universal Standards (which is the fruit of the bottom-up, collaborative approach to developing them) lends them **credibility** which stakeholders appreciate. *"The fact that Universal Standards are internationally recognised gives them authority and facilitates promoting SPM,"* notes a qualified auditor. As a result, people feel confident in initiating SPM in their organisations on the basis of a SPI4 audit because it is aligned with the Universal Standards. FSP staff who have been involved in audits appreciate the direct involvement they are able to have (either in a self-assessment or accompanied self-assessment) and the process of **learning by doing**: learning about the Universal Standards by doing the audit. The exposure to SPI4 itself is considered as an empowering source of knowledge for managers to prioritise and initiate new activities. People become aware during the audit process and more engaged on the next steps.

The Universal Standards along with the SPI4 are seen as a **clear path** toward improved practices. They have *"become the reference to assess, document, monitor social performance…strengthening [our] practices institutionally through better service to clients,"* states a Central American FSP. A commercial bank in South America notes that *"the SPI4…allow[ed] the organisation to assess itself honestly and establish clear, achievable goals that allow it to progressively improve." "SPM provides the right direction to go"*, shares an FSP in East Africa.

Use of the SPI4 or other SPM-related activities can often generate discussion or reflection that proves beneficial beyond the immediate task at hand. As an FSP from West Africa explains: *"The results [of the SPI4 audit] have generated a healthy discussion about the organisation's social goals and steps are continually taken to address the gaps identified after adopting USSPM."* Furthermore, some SPI4 users report that examining SPM weaknesses and thinking of an action plan for improvement has a prophylactic effect. Issues that maybe were causing a problem in only one branch get discussed throughout the organisation, and other branches learn from them and benefit from the strengthened and clarified policies and practices. In this way, other branches are likely to avoid encountering the same problems themselves at a future time.

In terms of changes observed since using the Universal Standards, the most common change was a "**clarified strategy**" that puts clients first. Using the Universal Standards has helped create a *"culture [in which we] focus on the client, both internally and externally,"* said an FSP in Central America. An FSP Ghana adds, *"Clients are now more conversant about their rights and responsibilities. Our operations are now more customer friendly as clients are placed in the center of all decision-making."*

Read more about how Universal Standards have benefited Opportunity Bank Serbia and ACFB in Benin in the appendix to this Brief.

Takeaways

- The Universal Standards framework is valuable to and valued by FSPs, networks, and TA providers alike
- Even a small level of initial engagement with the Universal Standards can lead to deepening of practice over the years, as the positive effects of the change are motivational
- Conducting an audit with the SPI4 tool often results in an organic self-training, during which the process of filling out the questions increases the FSP's understanding of what SPM is and how it is relevant to the institution's particular practices

LESSON 4: THE SPM JOURNEY HAS OBSTACLES

By far the most common critique associated with the Universal Standards is that they are **too long** and, at least initially, **overwhelming**. This is of course doubly true for the SPI4, which often has multiple indicators for each Standard. *"SPI4 is too cumbersome, too many indicators, [it is a] painful process to collect so much information,"* laments one user. The Excel format is also criticised by some users for its formatting constraints (macro, functions detected by firewalls) and "boring" aesthetic that needs to be updated to "the digital era we live in." The social audit process is also daunting for some. It takes time to set up interviews, branch visits, make documents available and discuss results. Given the length of the tool and competing priorities, the scheduling of all the steps in this multi-day process can easily get delayed.

Another frustration is that the Universal Standards are **too demanding**. This frustration is especially high for SPM neophytes, who find the level of detail (especially in the SPI4) excessive. As one auditor puts it, *"some small organisations feel they can't measure up with the levels of some standards, or consider that somehow these standards make it harder to be sustainable in the short term."*

But we also hear the reverse. Some suggest that for FSPs that are more advanced in their social performance management, the Universal Standards are **not demanding enough**: high scores can encourage them to stay in their comfort zone rather than innovate. These frustrations raise interesting considerations about the need to differentiate or hierarchise certain Essential Practices within the Universal Standards framework. They also underline the difficulty of hitting the right balance between aspirational and achievable.

There is also the challenge of working with a framework that is…standardised. Some users point out the risk of glossing over, or simply not addressing, the **specificities** of certain organisations because they cannot be captured by a standardised framework. Similarly, we occasionally hear that despite their "universal" vocation, it is not always easy to implement all of the Universal Standards in every context. Moreover, one investor points out that: *"We want to understand the institutions, to focus our ownership agenda in the right place. This is much more important than comparing their performance in standard indicators."* Be that as it may, many FSPs actually appreciate having the clear parameters a framework provides: it keeps them on track. In fact, they'd like to see more recognition from investors for taking the SPM path, lamenting a *"regrettable absence of incentives from investors who do not value work on CPP and/or SPM."*

The most daunting part of the SPM journey is going from **assessing to implementing**. It requires getting all staff on board—a challenge because the cross-cutting nature of SPM is not necessarily grasped right away. *"Mostly, the management sees SPM as a separate concept apart from the Operations and other support units such as HR, Finance etc., that we're doing SPM for compliance. It's hard to introduce the Universal Standards specially because they have been so used to the paradigm where it did not exist before. Another difficulty is that they see problems relating to social performance as isolated cases instead of part of a whole system,"* says a FSP in the Philippines.

FSPs and auditors alike say that it **takes time** to convey the message that SPM is not a standalone activity and for each department to understand their role. Top management and the Board have a critical role to play in setting the tone, and of course, nothing beats evidence-based results that show the business case. In the experience of the SPM Champion for an FSP in Eastern Europe, *"Support that the entire process received from the senior management, including members of our Board of Directors, was the key in the buy-in process, as well as the evidence that results, staff morale, client satisfaction and retention improved since we have introduced SPM into all segments of our work."*

Finally, even when the buy-in is there, many FSPs still **struggle to make changes** to their operations: it's one thing to understand that you need a data protocol, it's another to actually sit down, create that protocol, and roll it out throughout a branch network. This can be particularly fraught when staff members disagree with the auditor on his or her assessment, which is more common when assessment findings reveal a lot of gaps. Even when all agree on the audit results, a very common response to suggested change is for departments to resist it and seek to avoid any additional responsibilities that the changed policies and practices might require. Certain FSPs simply feel they lack the internal capacity to address their SPM gaps. As one West African auditor explains, *"FSPs are still seeking out trainings to better master the contours of SPM and internal implementation."*

Takeaways

- The Universal Standards are considered too demanding by some, not demanding enough by others, and too long by most. Perhaps it is time to consider introducing a hierarchy among the Universal Standards, to create a lighter set of core standards that can be reinforced with more rigorous practices when the FSP is ready to advance to a higher level.
- SPM is still often seen as a separate activity, not the responsibility of all. There is a need to amplify this message and continue to develop case studies/resources that reinforce the "operational area" approach to SPM, along the lines of the ImpAct Consortium's approach[9].
- Given the very common human reaction to resist change, and the immediate expenses of investing in SPM improvement, it will continue to be difficult for FSPs to shift from learning about SPM to actually changing practice. Greater dissemination of information about the technical resources available, including case study examples, would likely be useful, as would be the continued existence of regional facilities to offer co-financing as well as trainings.

WHERE DO WE GO FROM HERE?

This brief aims to take stock of what has been done to make microfinance investment more responsible since the launching of the Universal Standards in 2012, and to draw lessons on how to continue to promote the Universal Standards in the responsible finance ecosystem.

One key insight is that we have made progress: that means what we have been doing for the past five years might not be what the sector needs in the next five years. Leading initiatives to some degree have started to switch from working ON the Universal Standards to helping FSPs and investors work WITH the Universal Standards. The focus on awareness raising and dissemination of the last five years should continue, but be complemented by greater efforts to build TA capacity to support implementation and operationalise SPM (e.g., a systematic mentorship or coaching program of TA providers by people with extensive, field-based SPM expertise). Given strong adoption of the Universal Standards by some but not others, the promotion of the Universal Standards will now require a differentiated approach: where awareness is low, training is critical. Where awareness is medium, assessments make sense. When awareness is high, the focus should be on supporting implementation and technical assistance.

Based on the four main lessons highlighted above, we can also offer specific recommendations to members of this Action Group as well as all other stakeholders involved in promoting the Universal Standards.

9 https://sptf.info/images/spm_practice_guide_english.pdf and Smart Operations https://www.smartcampaign.org/tools-a-resources/796

- **Sustain promotion efforts, in a differentiated way, and focus on the stakeholders that drive change.** Well-funded promotion efforts by credible sector stakeholders are key for paving the way for FSPs to take the SPM journey and clearly lead to greater adoption of the Universal Standards. Regulators, investors, and national associations can all significantly influence the knowledge and actions of FSPs, so outreach to these actors remains critical, and would preferably be done in a way that uses the language that resonates with each stakeholder group, and specifies what role we see each group playing. Among FSPs, a differentiated approach to promotion is ideal to meet the FSP where it is, both in terms of existing knowledge of SPM and resources. Using the right language to talk to each type of FSP is also important, given the different perspectives and goals of different stakeholder types, from NGOs to highly commercial entities.
- **Continue to work collaboratively.** External stakeholders—country networks, consultants, investors, rating agencies—all play a role in promoting the adoption of the Universal Standards. FSPs and their clients are the raison d'être of the Universal Standards, but without the supporting infrastructure, it is unlikely that widespread implementation of the Universal Standards will be possible . As a sector, we must continue to coordinate to sustain and harmonise the efforts of the various actors in the inclusive finance ecosystem, and to maintain our collective focus on the ultimate goal of creating benefit for clients.
- **Communicate more! Communicate better!** Several of the obstacles to stronger implementation of the Universal Standards stem from inadequate communication around the bottom-up emergence of the Universal Standards and the business case for social performance, with testimonies coming from the FSP's themselves. We also are learning that different terminologies resonate more with different audiences, and that even within the same type of FSP, ones that are smaller or newer might need a different set of information communicated than ones that are larger or more experienced.
- **Build capacity for integrated technical assistance.** On the one hand, there is a lack of qualified local consultants to support SPM implementation. On the other, FSPs still often see SPM as separate activity driven by outsiders rather than an overall management approach that infuses an entire corporate culture. There is a need to build up the pool of SPM-specific TA providers. But there is also need to better integrate SPM into "traditional" TA assignments. This means, for example, including SPM concepts into the Terms of Reference of a business planning or human resource assignment, MIS revision, a portfolio audit or a risk assessment. The TA Facilities of social investors, especially, should adopt this approach of "generalising" SPM into all the support activities offered to their investees.
- **Consider a tiered approach to implementation of the Universal Standards.** Not everyone has the capacity or buy-in to absorb the same amount of change. Perhaps it is time to consider introducing a lighter set of core standards for FSPs that are newer to SPM, and that can be reinforced with more rigorous practices once the FSP builds a foundation of knowledge and skills in SPM and has achieved some early benefits from it.

We would love to hear from you! To share your experience with Universal Standards implementation, or to ask for further information, please contact CERISE at spi4@cerise-microfinance.org or MFC at microfinance@mfc.org.pl at or SPTF at info@sptf.info.

Appendix

OPPORTUNITY
Banka

Interview with Mirjana Panin, Director of SPM & Communications Opportunity Bank Serbia

July 2018, CERISE, OBS

Hello, Mirjana, thank you for sharing with us your experience with the Universal Standards for Social Performance Management.

First of all, could you share few words about Opportunity Bank Serbia (OBS)?

OBS is part of Opportunity International network. We were founded in 2002 and now have 45,000 borrowers and approximately the same number of savers. The Bank is the first in Serbia to become a member of the Global Alliance for Banking on Values (GABV), the umbrella organisation for the world's ethical financial institutions. OBS fills an important niche in a country that is more or less devoid of other microfinance providers, due to the lack of microfinance legislation. The 30 or so commercial banks are not interested in microenterprises and start-ups and there is only one fully-functional non-bank MFI. This means OBS is practically the only source of financing for small farmers and micro entrepreneurs in Serbia.

When did you start working on SPM? Why did your organisation decide to conduct SPI4 audit?

The Opportunity International network defined a strategy in 2013 that made social performance a mandatory activity for all its partners. The first step in the strategy was to do a social assessment and prepare for Smart Client Protection Certification. I was in charge of the marketing and communications back then, but I took on the additional task of the so-called "SPM Champion" in OBS. I first familiarised myself with the various SPM aspects of our operations, and opted to use the CERISE-SPI4 tool for the initial self-assessment, since it includes both the Universal Standards for Social Performance Management and the Smart Campaign Client Protection Principles. Later on, the OI network requested us to regularly report and present our SPI4 results to management and the Board.

Using the Universal Standards has led us to make changes like creating a Social Management Committee within our Board of Directors that meets quarterly to discuss progress towards the Bank's social goals and plans for the future. We have also included social goals into our business plan and developed our own methodology for measuring the portion of low income, rural and underbanked clients, as PPI data are not available for Serbia. SPM has become integral part of every activity done in OBS. The SPI4 gives us the opportunity to assess our alignment with the Universal Standards and client protection principles every quarter (when we do partial assessments) and every year (when we do complete assessments).

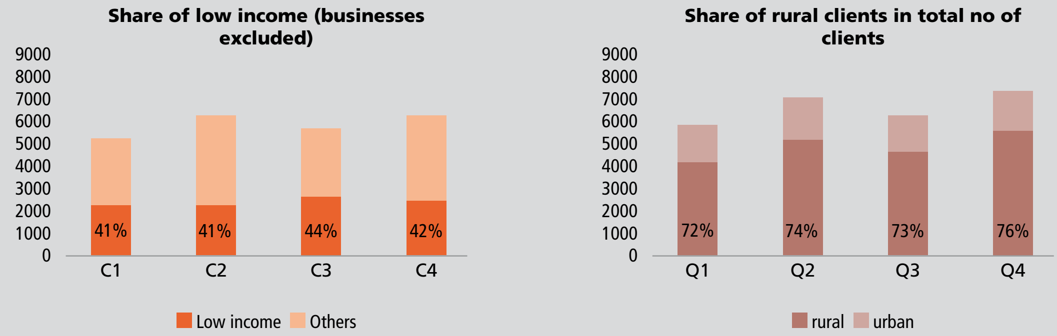
You use now simple and powerful metrics to track financial inclusion. Can you tell us more about it?

We developed a methodology to measure the portion of underbanked clients in our portfolio.

OBS has a mission of financial inclusion that is already monitored by tracking the share of rural and low-income clients in our portfolio. The poverty level of new clients is measured during credit analysis for all loan products (except for businesses), and compared to per capita household income data retrieved from the National Office of Statistics of Serbia. This is automated in the MIS, which generates automatic reports.

Recently, we have started using information from the Credit Bureau, which allows for simple, automatic, MIS-based access to clients' loan history. We started to measure and report on the number of new credit clients with no previous loans, based on Credit Bureau data, in November 2018.

Targeted clients overall outreach



There is a catch, however: the Serbian Credit Bureau only saves data in individual reports for three years back. But, we are still quite satisfied with this solution as most of our clients, especially from the agricultural and business segment, need constant financial support. So if they haven't taken out a loan in the last three years, we are pretty sure that it is due to one of two reasons: a) lack of access to financial services because of insufficient or irregular income, or because the business is in a start-up phase, or b) lack of awareness about the financial services that are available to them.

We also collect data on clients with no previous loans through a Quarterly Client Satisfaction Survey, and these sample-based data are completely in line with what's reported through our MIS with the help of Credit Bureau reports.

This information from the Credit Bureau remains a simple and good proxy for financial inclusion!

And we are proud to report that over 4,000 clients or roughly about 44% of our new clients since November have been included in the financial sector thanks to OBS!

And for your clients, you have designed an innovative savings product. How does it work?

In three of our urban branches (Kragujevac, Novi Sad and in capital of Belgrade), we have implemented a product called "STASH"- Innovative Savings Product for Small Savers, suitable for low-income clients. We propose a loan up to 200 Euros (equivalent in Serbian dinar/RSD), approved to clients without fee or interest. The loan is immediately placed in a 12-month term deposit account, so the client doesn't actually access it immediately. Clients "repay" exactly 1/12th of the loan every month for 12 months. After full loan repayment, clients can withdraw the full amount of the loan—the "stash"—with a 12.5% interest. We launched an educational campaign on home budget management and importance of savings when the product was announced.

If you want more information on both the education materials and STASH, do not hesitate to visit our website[10]!

How did you decide those characteristics for STASH, and what has been the buy-in so far?

The idea for STASH was based on a nation-wide research from 2016 which discovered that only 28% of Serbian citizens would be able to cover an unexpected expense to the amount of 200 Euros. 37% would have to sell something or borrow the money, while 26% of citizens claim they have no means of securing that amount. So, we started thinking about how to show low-income clients that is it possible to save, even with small amounts.

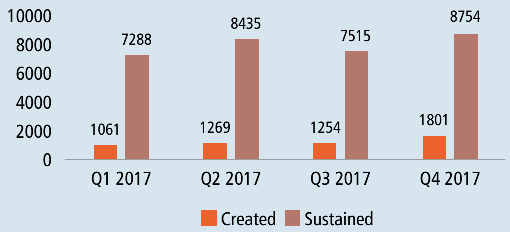
10 http://www.7koraka.rs/eng/ and http://www.7koraka.rs/eng/step-plus1/

We knew financial education had to come first, to demonstrate household budget management skills and explain that savings does not have to be measured in thousands of euros. It can also be a relatively small amount of money that will come in handy in the case of emergency and make us more resilient to crisis. But for all the people who are still not convinced that they are able to save even after applying all seven steps from our budget management guide, we have developed Stash.

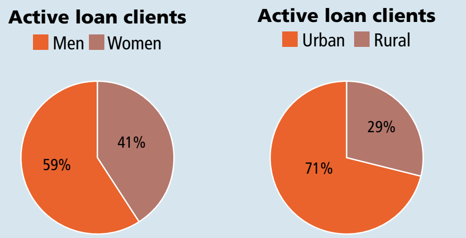
So now, in the four months following the launch of Stash, we have over 70 clients in our three branches. 90% of these clients have never taken out loans from OBS before which means that we have been successful in reaching a new client base (urban low-income clients). However, we do not know what percentage of STASH clients are underbanked because (as we were trying to keep client's cost at 0 RSD), we do not require Credit Bureau Report for this product. We want to reach more people with this product. The plan is to digitise the product application process in order to enable Stash clients to enter all information online, so that the client only needs to spend 15 minutes at the OBS branch instead of the one hour which is currently necessary to generate, review and sign all the contracts and annexes. The plan beyond 2018 is to make the product available in all our branches in Serbia.

Client outreach and job impact

Contribution to jobs creation and sustaining



Loan clients



	Jun-17	Sep-17	Dec-17	% change Q4 vs Q3	Change Trend
Active Borrowers	40,739	41,417	43,070	3.9%	↑
Voluntary Savers	38,976	40,029	41,255	3.1%	↑
Gross Loan Portfolio (RSD)	10,789,771,578	10,877,805,675	11,361,385,999	4.4%	↑
Deposits as a % of GLP	67.6%	66.6%	62.2%	-6.6%	↓

You have also worked on the complaints from your clients?

Yes, we redesigned the mechanism for resolution of "informal client complaints." Serbia's Central Bank has very strict and complex regulations regarding formal client complaints. Therefore, the number of formal complaints is low, as the typical OBS client is not able to understand and abide by complicated procedures. As of December, clients can submit informal complaints using four new channels: text messages, Viber, emails and Facebook Messenger.

In three months, we received 29 informal client complaints, which we call "Objections and Suggestions". Client mainly use email, Viber and text messaging. The reasons for complaining vary, from staff behavior to technical issues (wrong phone number, too long loan approval process, etc.). This is proof that it was indeed necessary to introduce an informal complaint channel, as most of these complaints would not qualify as "justifiable" in line with the Central Bank's rules.

The new mechanism helps us correct important irregularities and issues, and hence improve services. Clients are quite thrilled to have someone from the bank (usually a branch manager) call them and inform them about their complaint status, resolution or simply just apologise.

Mirjana, overall, what did you learn? What are for you the key lessons of this work on SPM?

First of all, implementation of SPM standards is a process that needs to be constantly revisited and improved. There are no "one size fits all" solutions when measuring the achievement of social goals– each MFI needs to adjust to its context, its social mission and targeted clients.

We also learned that developing products especially aligned with SPM principles have great (and perhaps unused) potential.

In our context, financial education is becoming more and more relevant for financial inclusion, due to the fact that underbanked clients have lower education levels and no previous experience with financial products and services. Due to increased micro personal lending in MFI industry, financial literacy initiatives are becoming even more relevant than BDS (business development services)

In general in our organisation, more thought has been given to protection of clients' rights, and to better defined procedures.

And our efforts are valued by external verification: MicroFinanza Rating has given Opportunity Bank Serbia a social rating of "A," in June 2016, up from "A-" two years before.

Those are great achievements. Did you face any difficulties in using / promoting the Universal Standards in OBS?

Yes, department heads did not immediately see the benefits of complying with the Universal Standards, and it was difficult to convey the message that everyone is in charge of SPM. It took time for them to get familiar with the Standards and adjust their department's work and procedures to align with them. Support from senior management in OBS, including Board members, was the key for buy-in. Early evidence that OBS results, staff morale and client satisfaction and retention had improved after introducing SPM into all segments of our work also helped get staff on board. Finally, the positive attention that we received from Opportunity International, which has promoted OBS as an exemplary network member, was a big help as well.

Another challenge is that the SPI4 tool is not very user-friendly to start with: it can cause computer problems (the macros in the Excel file cause our IT security system to identify it as harmful). Moreover, it is quite long, especially the questionnaire! But, after I attended a SPI4 training which took place in India during the 2018 Annual SPTF Meeting in Chennai, many things fell into place. The SPI4 Audit Guide developed by CERISE, which explains how to assess compliance with every single indicator along with examples, was also very useful. However, I would advise a significant upgrade from Excel into something more in line with the digital era we live in!!

Back in 2013 when we first started to learn about SPM, we thought that the concept was not applicable in our bank, due to the country context (hardly anyone in Serbia knows what SPM is so it is usually very difficult to explain what I do!). However, once you dive deeper into the Standards, especially if SPI4 is used, the whole idea and purpose of this exercise becomes clearer.

Many thanks, Mirjana, for this very concrete experience! CERISE will soon share information for SPI4 online! We hope it will save some of the constraints for the practitioners!

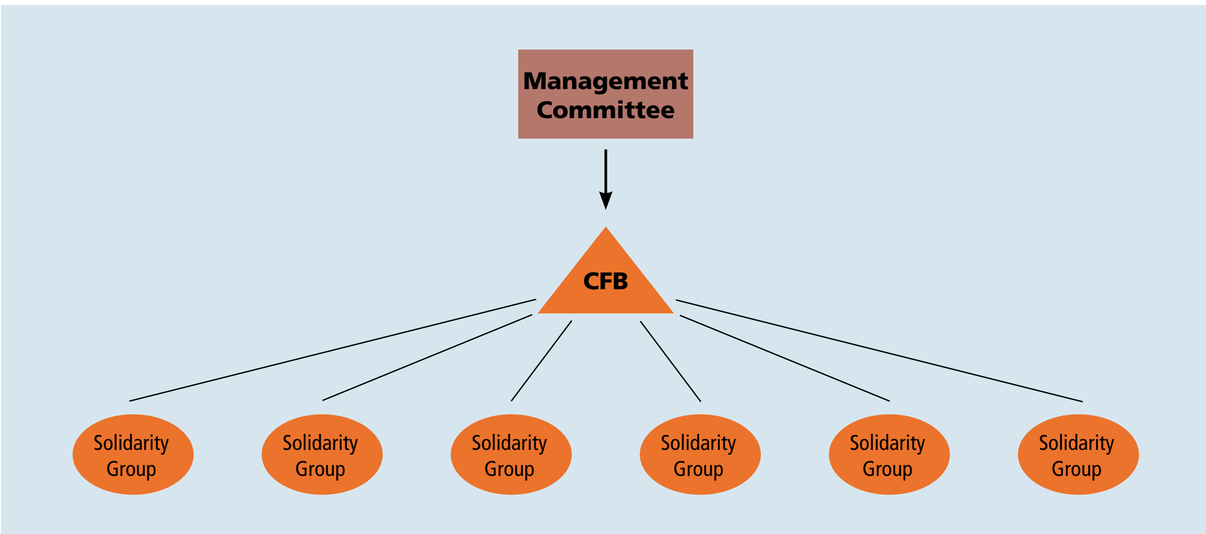
Interview with Emmanuel Gahou, Director
Association des Caisses de Financement à la Base (ACFB)
April 2018

Thank you very much for agreeing to this interview! Will you please briefly describe ACFB?

L'Association des Caisses de Financement à la Base (ACFB) is a microfinance institution in Benin that was founded in 2004 and has a deeply engrained social mission, with a particular focus on promoting the economic empowerment of women. It offers credit and savings products, and as of year-end 2017, we had about 110,000 clients.

ACFB clients play an essential role in ACFB's governance structure. Can you explain how it works?

ACFB's governance system allows clients at all levels to participate in strategic decisions. Almost all of ACFB's loan clients are organised into groups called *Caisses de Financement à la Base* (CFB) that have about 50 members. Each CFB has its own steering committee (in French, comité de gestion), whose members are clients, and the CFB steering committee manages the daily activities of the CFB. Its primary function is to ensure the good use and reimbursement of the loans we give.



In addition, each branch works with a committee called *comité local d'appui* (CLA), whose members are also clients. Each CLA's responsibilities include oversight of the activities of the CFBs served by its respective branch, consideration of individual credit requests, joint decision making-with CFB steering committees on the provision of loan capital to the CFBs, and support of efforts to collect unpaid loans.

Do clients also participate in ACFB's governance at a national level?

Yes. Members of the ACFB board of directors are elected from the members of the CLAs. So in this way clients set the institutional strategy, oversee the operations of all branches, approve budgets, and generally lead the organisation.

What results have you observed from integrating clients so fully into ACFB's governance structure?

Because clients are part of ACFB's governing structures, ACFB is very responsive to the evolving needs and preferences of clients about our products and services. Our elected board members are very careful to consider the effects on clients of every strategic decision that we make. An important additional benefit is that clients really feel as if the institution belongs to them. So they completely share the management team's own goals around achieving and maintaining financial sustainability. All of our decisions take into account both our social mission and our sustainability goals.

How do you make sure that you are reaching your primary target client group of poor women?

We are careful where we open our branches. 10 out of our 12 branches are in rural areas, because poverty rates are higher there. To make sure we reach women, we design and offer products that are specifically adapted to the lives of the poor but economically active women. 85% of ACFB clients receive group loans, where groups members serve as each other's guarantors. Poor women generally do not have an asset or a financial contribution to use as collateral. What makes this product really good for clients is that we provide training along with credit, so that each woman in the group understands her responsibilities to the group and feels empowered to manage her loan. Specifically, before a group receives its first loan, group members must attend three months of training, where the loan officer leads one training per week on topics such as how the group works, the importance of savings, how to manage credit, and what to do when faced with an unexpected challenge like an illness. Even after the group receives its loan, it continues to receive trainings. The ongoing training approach has helped ACFB to achieve strong loan repayment rates, and it is also something clients say they appreciate most about us. Furthermore, we offer a variety of products in order to meet clients' diverse needs, including a school fee loan that clients use to send their children to school. Today, 80% of ACFB clients are women and 90% of ACFB clients are rural.

When did ACFB first start investing in social performance management?

We have always tried to serve clients well, but we became much more deliberate about managing our social performance after a financial crisis that hit the institution in 2010. The crisis was caused by a sort of Ponzi scheme called ICC Services that rapidly spread throughout the sector. Simultaneous to that crisis, some of the CFB steering committees were mishandling clients' savings. ACFB's PAR 90 rose from 5.3% in 2009 to 9.7% in 2010, and our ratio of operational self-sufficiency dropped from 126% to 84% in that same period. The weapon that ACFB used to conquer this crisis was social performance management (SPM).

What specifically did you do first?

We chose to see the rising level of default not as the problem itself, which would typically be the perspective of a purely commercial bank, and instead considered client default as the symptom of some other problem. We conducted client satisfaction surveys to understand what was happening in clients' lives and what we could do better. We also solicited feedback from staff and from board members, and this included field visits made by senior management so we could hear directly from clients. Collectively, our efforts to be present and listen helped to re-build the confidence in the institution that had been shaken by the crisis.

So, you listened to clients and to staff so you could understand the underlying problems. What did you do next?

We began a program of trainings, of staff, board members, and clients, to make sure everyone understood that we were here for clients and to give clients the tools they needed to prevent over-indebtedness and to manage their finances responsibly. We trained staff on the fair and respectful treatment of clients, as well as on analysing credit applications to make sure the size of the loan provided was coherent with the client's ability to repay. These actions are core to client protection. We made it very clear to staff what their responsibilities were in these areas. We also formed an internal audit team to monitor adherence to our mandated procedures.

In addition, we took steps to make sure we were being totally transparent with clients about the terms and conditions of our products and services, and to make sure that our method of communication was clear even to clients who are illiterate. This meant having a combination of brochures and posters in our branches, as well as oral awareness raising sessions for clients in the field.

Another major strategic decision we made was to lower our interest rate, from a 24% linear to a 20% declining balance interest rate.

Did you obtain the results you were hoping for from this investment in social performance management?

Yes, definitely. We regained client trust, the default rate began to decline, and clients began to save more with us. And because of these initial positive results, between 2012 and 2017, ACFB continued to invest in and expand its social performance management practices.

What additional steps did you take?

With support from the MISION Africa project (Microfinance institutions Improve their Social Impact and Outreach through Networks in Africa), we first refined our mission. A good mission statement should at minimum specify three things : who your target clients are, what types of benefits you hope to help them achieve, and how you will do it. Once we had a clear mission statement, then we defined some indicators to track so we could monitor our progress. These indicators were both social (e.g., % of clients who are satisfied) and financial (e.g., % annual growth in credit portfolio), since we seek strong social and financial performance. We also created a new business plan.

More recently, we design an improvement plan that has several workstreams: training board members on SPM and their specific responsibilities related to it, a financial education program for clients, and an improved mechanism to resolve client complaints. This mechanism specifically accommodates illiterate clients, who of course need to communicate their complaints orally.

All of this costs something. Does the investment in SPM pay off?

Certainly SPM has a cost. For example, in 2017, ACFB reserved 5.2% of its budget to cover expenses of the CFB steering committees and another 4.9% for trainings offered to elected committee and board members. But, ultimately, having this perspective of "How do we serve clients better?" led us to ask ourselves some new and interesting questions that led to the changes I just described, like lowering the interest rate and expanding our training program, that ultimately strengthened the sustainability of our own organisation.

Today, ACFB is one of the most financially stable institutions in Benin. In the past ten years, the number of ACFB clients grew from 14,000 in 2008 to almost 110,000 in 2017. We attribute that strong growth in large part to positive word of mouth from our clients to others in their villages. Over that same period, our savings portfolio multiplied by 3.5 and our credit portfolio multipled by 2.5. In 2017, ACFB was honored with the *Prix de l'Excellence*, awarded by the national association, Consortium Alafia.

Those are excellent results. Congratulations. What next steps do you have planned?

It is an ongoing challenge to make sure that staff at all levels as well as board members understand what SPM is and why it is beneficial to the institution. It is particularly challenging to keep all field agents trained. So, we continue with our awareness raising. We also got some interesting results from our staff satisfaction survey that revealed certain inequalities in staff treatment, for example related to recognition and to work load, and we need to resolve those. One of our goals is to improve staff retention.

Do you have any final thoughts to share, particularly around advice to others?

A major lesson learned is that social performance management is not an action, or a set of actions, that happens at one point in time. It is an ongoing effort and has to evolve according to the institution's own challenges. I would also say that we have learned that the major problems we have or will face are likely to be solvable by changing our own policies and procedures, and by listening always to clients, staff, and board members. Their input will lead you to solutions.

Thank you very much for your time!

NOTES

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