



# Field Guide to Obtain Customers' Views on Empowerment

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## 1. Purpose of this Guide

This document provides guidance for discussion with customers of Financial Service Providers (FSPs) about their understanding of “customer empowerment.” The term “empowerment” is multidimensional, and context- and culture-specific. It is therefore not recommended to talk to customers directly about “empowerment.” Rather, this Guide presents a *framework* that breaks empowerment down into a number of dimensions that can be explored in order to build a picture of the experience of specific groups of customers. The guide was developed and refined through field testing in India.

Empowerment is not a “state of being”; that is, it is not something that is either present or not. Rather, it is about structures that block or enable. It is the result of internal and external factors, and must therefore be understood in relation to the service provider as well as the specific context of the customers. While “empowerment” as a concept may be difficult to explain and communicate, people will easily relate to the lived experience of “disempowerment.”

The **underlying hypothesis** for this work is that a more dynamic customer-provider relationship that is based on trust and that builds customer confidence will help reduce the problem of inactivity and will result in a win-win for both sides. To advance financial inclusion, there needs to be more **uptake** and **usage** of financial services by poor customers. FSPs need to adapt their design and delivery of products and channel options to targeted segments and improve their **interaction** with the customer to empower them to **choose** and **use** financial services. To achieve full financial inclusion, we need to move to a more interactive and dynamic relationship between providers and customers and an environment in which FSPs facilitate **customer empowerment**.

The focus of this field research is to **understand customer views of “customer empowerment.”** This will contribute to building the definition of customer empowerment and strengthen the framing of the concept for CGAP’s work on customer-centricity. While looking at financial services in general, there is a specific focus on digital financial services.

### **An empowered customer**

- is able to choose and use financial services that are valued in relation to her or his needs, preferences, and priorities
- has trust in her or his financial service provider and confidence in transacting
- has a voice
- is able to engage in a respectful relationship with a provider.

**Providers** contribute to customer empowerment by delivering a positive customer experience through a dynamic and interactive customer-provider relationship, and benefit from more uptake and usage as a result.

***I am an Empowered Customer: I trust the financial service providers I use, they treat me with respect, I am confident in transacting with them and feel free to exercise my voice. As a result, I make informed choices among the range of financial options available and use services I value. I have greater control of my financial life.***

## 2. Setting up field research

### 1.1 Setting up interviews

The pilot in India demonstrated the value of having a host organization that has an existing relationship with the interviewees. This allows direct access to the people of the profile required (provided that this is clearly discussed with the host organization). It also establishes a level of trust and openness (assuming that there is a good relationship with the host organization). Trying to talk to people without this being mediated by a host organization proved to be fruitless in the India pilot.

There are risks involved in using a host organization. The host may select participants to portray their work in a good light or based on preconceptions or prejudices. Similarly, participants are likely to associate the interviews with the host organization, and this could bias the results. This was not a problem in India, but must be guarded against. In India, the main host organization was not an FSP, and that may have helped mitigate these risks.

### 1.2 Profile of people to interview and sampling

We recommend a mix of focus group discussions and semistructured individual interviews (see section 2 for the rationale for this).

The aim should be to talk to customers as well as nonusers with experience of a range of FSPs and with different experiences of empowerment. The customer experience of engaging (or not) with financial services varies significantly with their profile. Careful thought needs to be put into selecting a sample to interview that will provide a range of experience.

It is useful to talk to “positive deviants,” that is, people who are typical in their experience and to those who have overcome barriers, such as those who are exposed to digital financial services and have chosen not to access them, those who have accessed them and stopped using them, and those who have accessed them and continue to use them.

**Community level:** Important factors to consider include the physical location of a community, its infrastructure, services, access to land, and political influences. For example, in India, the presence of a railway station in an otherwise remote village had a considerable impact on access to financial services. The influence of the state and existing support programs also played a key role.

**Societal factors:** Caste, religion, ethnic group, gender, and marital status all have an impact on how individuals are perceived, how they perceive themselves, and how they relate to others in the community and wider society.

**Individual factors:** These include wealth, education, source of income, position in the family (for example, widow, single woman, divorced), children, other family members outside the community, migrancy, and leadership qualities.

It is, of course, impossible to sample according to all of these factors, but it is important to consider which factors might be important, to capture interviewees’ status in relation to these factors, and to make adjustments during the research to take into account factors that arise as influential. These are also important to consider in the analysis.



### 1.3 Logistics for Focus Group Discussion (FGD)

**Group size:** Given the personal nature of the subject, it is important to be able to probe and understand individual participant’s experience within the larger group discussion. To aid this, the group should be no larger than six people maximum. Beyond this it becomes difficult to ensure participation of everyone, and it is likely that some perspectives will be lost.

**Homogeneity of group:** Given the range of financial services and the many factors that will influence experience, it is important that the FGDs be relatively homogenous in terms of the profile of participants. Otherwise, it is likely that the group interview will become a set of parallel interviews in a group setting, and it will be difficult to generate any discussion between participants. Groups with different profiles should be selected to allow representation of different experience.

**Translation:** Interviews should be conducted in the participant’s mother tongue, and where necessary translation used.

**Facilitation and note taking:** FGDs should be facilitated by two people, so that one person can focus on monitoring the flow of the discussion and providing support to the main facilitator in terms of following the interview guide and probing questions (these should be written down for the main facilitator so as not to interrupt the flow of the FDG). The co-facilitator should also take notes.

**Duration, refreshments, and breaks:** The FGDs are designed to last about two hours. Ideally, refreshments should be given after about one hour so as to sustain focus and energy in the discussions.

**Materials:** In addition to plain cards and colored marker pens, the following need to be prepared:

- **Provider/channel cards:** Cards need to be prepared for discussion (see section 3.3). The cards should be photos/drawings of all the local service providers and channels: post office, bank branch, service point, agent, point-of-sale machine, mobile phone, ATM card, self-help group/savings group, savings club, money lenders (if there are multiple providers for services, include a card for each provider). The cards should be A5 in size and, ideally, laminated.
- **Statement cards:** These cards are used in section 3.4. Each statement should be translated and written onto a separate A5-size card. The statements are:

Choice	I can’t choose which FSP will be the best for me.	I can choose which FSP will be the best for me.
Use	I am not able to use or make the most of the services on offer.	I am able to use the services on offer and make the most of them.
Voice	I don’t talk to my service provider about what I need or want.	I talk to my service provider about what I need or want.

### 1.4 Setting up individual interviews



Individual interviews should be conducted with a range of participants in order to capture a mix of different levels of empowerment and range of experience in accessing and using financial services.

Some individual interviews should be conducted with FGD participants to understand specific experience in more detail. Other interviews can be conducted with individuals who are difficult to recruit to an FGD.

## 2. Research approach

### 2.1 Methods

A mix of focus group discussions and individual interviews are used, with tools designed to probe the customer experience and the processes in the relationship between customer and FSP that support or hinder customers to be more empowered. Specific tools and questions are detailed below.

### 2.2 Focus of questions

The concept of “empowerment” is conceptually difficult; therefore this document breaks down “empowerment” into three dimensions—choice, use, and voice—with a focus on both the experience of customers and their perceptions of empowerment as captured in those dimensions. Questions listed “for customers” in the framework in section 2.3 are not designed to be direct questions, but to guide the facilitator to inform probing during the interviews. The role of a co-facilitator is important here to review the discussions and identify additional areas to probe.

There are two sets of core questions that guide the interviews:

#### 1) *Customer perceptions of aspects of empowerment*

What makes you have trust or confidence in a provider?

What makes you feel confident to transact using a certain product/service or delivery channel?

What does it mean for you to be treated with respect?

What does it mean to be listened to and to have a voice?

How much do customers feel in control of the relationship with a provider?

#### 2) *Customer experience*

The facilitator should look for opportunities to move from the general to specific, focusing on the following questions:

- What were the touchpoints with the FSP?
- What led to your decision/action?
- What did you do?
- What did the FSP do?
- What was the involvement/influence of other people in this (family, other group members, community, and so forth)?
- How did you feel?
- What was the result/consequence of this interaction?

### 2.3 Framework of issues to probe



**CHOICE – INFORMED DECISIONS: Customers are able to make “good” decisions.**

***An empowered customer will have the following capacities:***

- Understand how products and services will meet their specific needs
- Understand that they can make choices in the selection and use of services and various delivery channels
- Ability to evaluate an FSP and the channels it uses in terms of value and trustworthiness
- Ability/confidence to be able to articulate needs and experience
- Be able to judge own knowledge compared to what’s available—“Actually, I don’t know everything and all choices.”

***An empowered customer will take the following actions:***

- Make comparison between providers and channels
- Ask questions or seek help to gain knowledge and understanding if doesn't understand
- Make informed decisions
- Engage, try out, and “learn by doing” (choices will evolve).

***Touchpoints with an FSP committed to facilitate customer empowerment will*** (Note: We are looking at the customer experience of the touchpoint and not the organizational policies, systems, or processes; probe to see if with time and practice situations and experiences improve)

- Provide timely and clear information and guidance to build knowledge and understanding, including opportunities for repeat experiences that build understanding and familiarity
- Provide an environment where customers are able to ask questions and signal a lack of knowledge and understanding
- Seek feedback from customers to ensure they are making informed decisions
- Respond where some customers are not making informed decisions (Note: Need to think about the individuals in the organization)
- Optimize “teachable moments”
- Optimize the user interface to facilitate comparison and choice.

***Questions to customers***

- What facilitates/hinders customers developing knowledge and understanding of their needs and the characteristics, risks, and benefits of financial services?
- Who does or does not have the skills to make comparison between providers? What drives this?
- What determines a customer’s ability to articulate needs and experience?
- What determines customer ability to exert choice in selection and use of services? (Note: We need to be thinking both of societal norms and organizational issues)
- Extent to which customers ask questions or seek help if don’t understand? Why? How? And who doesn’t/why not?
- Extent to which customers (a) make informed choices, and (b) feel comfortable using digital financial services?
- How do choices and customer experiences evolve over time based on experience?
- How do FSPs and different channels used compare to other institutions?

**Disempowerment:** “I don’t know what to do.” Not knowing what the right thing to do is can be a source of great anxiety. Any person or service that helps individuals make better decisions—and feel confident about these decisions—can therefore add huge value.

**USE – ABILITY TO ACCESS AND USE SERVICE FOR THE BENEFIT OF CUSTOMERS**



***An empowered customer will have the following capacities:***

- Ability to use a product or service across a range of delivery channels
- Ability to negotiate barriers to access or use a product or service (physical, timeliness, product characteristics, staff/agent biases or prioritization, other customers)
- A positive perception of entitlement/benefits from using a service (not self-exclude)
- Trust and confidence in provider and the service of their choice/preference
- Positive perceptions about the service or their ability as a customer to use it (for example, not fear banks)
- Not be inhibited in the use of services by financial services staff/agent attitudes or actions
- Not be inhibited in the use of services by other customers' attitudes or actions (for example, in groups)
- Recognize FSP touchpoints across different channels as transaction and information opportunities.

***An empowered customer will take the following actions:***

- Assert her or his own needs in face of pressure/competing needs of other customers or staff (for example, group loan guarantee)
- Having made a decision to use a financial service, will follow through
- Use financial services in order to have greater control and improved outcomes in financial life
- Engage, try out, and “learn by doing” (to become more confident)
- Leverage social networks to start using and get more confident about using financial services.

***Touchpoints with an FSP will...***

- Build customer understanding of the value of products and services and appropriateness
- Build channels/user interface that promote access and ease of use
- Build customer knowledge and understanding
- Promote access to and use of services by all potential customer groups
- Promote actions by customers that will support their use of services (for example, nudge text messages) and optimize teachable moments
- Provide time, tools, and incentives to “learn by doing.”

***Questions to customers (what makes a customer use – or not use – a service?)***

- Who accesses or does not access a particular (digital) product/service? Why?
- What prevents or supports customers from following through on their intentions to use a product or service?
- What is important in the relationship with service providers in terms of feeling listened to, heard, and responded to, respected? What does it mean to be listened to?
- What is important in the relationship with frontline staff/agents in terms of feeling listened to, heard, and responded to, respected?
- Do providers favor some customers more than others? If so why, and what is the impact of this?
- Do customers feel they have control of their financial life? What factors contribute to this?
- What would make customers feel more confident?
- How do customers learn?
- What was an experience in which they felt in a relationship of trust?

**Disempowerment:** “I don’t know how to do it” or “I know what I want to do and how to do it, but I don’t have the means to actually do it.” This breeds a sense of frustration and impotence. Providing guidance and allowing people to learn by doing can build confidence.

## **VOICE – SHAPING USE OF SERVICES** (Customer voice and protection)

### ***An empowered customer will have the following capacities:***

- Confidence, skills, and opportunity to engage with FSPs to shape their products and services
- Knowledge of their own rights and responsibilities and those of FSPs
- Knowledge and understanding of channels for complaints (Note: This is not just about the FSP)
- Confidence and sense of ability to be able to engage with FSP to give feedback or complain
- Perceive a level of accountability from the provider.

### ***An empowered customer will take the following actions:***

- Engage in dialogue and discussion with the service provider to shape the product/service they receive to their needs
- Provide feedback to the provider on their experience of the service (if channels are available)
- Adapt their use of services through reflection and learning
- Work collectively with other customers to hold the provider accountable
- Negotiate a resolution in event of a negative experience.

### ***Touchpoints with an FSP will...***

- Ensure access to effective and timely feedback and recourse mechanisms
- Create space for dialogue and negotiation with customers
- Support more vulnerable customers to engage with the organization in relation to aspects that affect them (for example, location or timing of meeting)
- Hear and recognize voices of different customer groups, particularly the less empowered
- Facilitate opportunities for customer's collective communication
- Promote an environment of openness, respect, and transparency
- Provide time, tools, and incentives to “learn by doing”
- Provide feedback to customers about what happens to their comments and suggestions
- Make grievance redress easy to use and clearly known to customers (both individual and collective channels).

### ***Questions to customers***

- Do customers feel they are treated with respect and are able to exercise their voice?
- Do customers feel they have some control and influence—active rather than passive? What are the processes and channels for engagement with the FSP?
- How did the customer feel about asking questions, making suggestions for changes, giving feedback?
- Whose voice is heard and why? Is your voice heard?
- Have the customers experienced any problems and if so did they communicate that to the staff/agent/FSP? If not, why not? If so, what factors allowed them to do so?
- What collective engagement do customers have with the FSP?
- What is the relationship between the FSP and “my community”?

**Disempowerment:** “I am not able to express myself” or “I am not listened to.” Not being able to speak your mind—being silenced or muzzled—is hugely disempowering. Giving people a voice is often value adding in its own right.

## **3. Focus Group Discussions**

### 3.1 Introducing research to participants

- Introduction to visitors by host organization
- Introduction of visitors and very short explanation of purpose of visit

Access for this research will be through a partner organization. Consent for the interviews will be obtained by the host organization. In introducing the research, it should be made clear that the research is being conducted independently of the host organization, that all information provided will remain confidential and no identifying information will be given to the host organization, and that there will be no direct connection between information given and subsequent changes to the operations of the host organization.

Explain the purpose of the research along the following lines: *“The purpose of the research is to better understand how customers relate to FSP—the services they offer and various delivery channels used—so as to inform improvements of practice for all FSPs and not for any specific organization. The questions will focus on understanding which financial services you use and don’t use, your experiences and aspects that facilitate or prevent you from choosing and using them.”*

### 3.2 Introduction by participants

Ask for brief introduction to include name and relevant profile information: for example, main livelihood sources, marital status migrant members in family, education level, age (factors such as ethnicity, caste, and so forth can be determined in the selection of participants rather than through direct questions). (Note: Minimize the amount of information asked for at this stage—further details, for example, “do you own a mobile phone?”, “do you have your own account?”, can be asked later in probing.

### 3.3 Discussion of product, services, and channels

- What financial products/services are available?
- Who are the different providers and delivery channels in the area?
- What do you use/not use and why?
- What are the benefits to you of using these financial products and services?

#### ***Channels and providers***

1. Using the pre-prepared photo cards, talk through with participants what providers are locally available. Probe whether anything is missing, and if so, add a hand-written card. Using the cards demonstrating type of channel and provider and whether the group knew of them was a good icebreaker/introduction.
2. Discuss positive and negative features of each of the channels/providers
  - Prepare two cards, one with a smiley face 😊 and one with a sad face ☹.
  - For each provider/channel, ask participants to place it on the happy/sad card or in-between, asking *“why would someone be unhappy/happy” using this?* Note: Do not ask why are you happy/unhappy or “are you happy,” but keep the question generic so as to focus on the general and not just the individual experience to get to aspects that are perceived as positive or negative.

- Probe reasons for things being good or bad.
  - Probe what people do in response to negative experiences. Ask for specific examples.
  - Probe customer journey and how experience has evolved over time.
3. Aim to generate a list of key factors that are important in terms of financial services such as:
- Access – what facilitates/blocks access? Who does/does not have access?
  - Reliability (that is, service works when you need it)
  - Trust in the service/provider (for example, won't mis-sell or defraud you)
  - Feeling understood and listened to
  - Complex or hard to understand/good information so can understand
  - Supportive staff or processes to help negotiate the process
  - Difficulty of using service
  - Ability to complain
  - Extent to which they are able to negotiate the product/service to tailor their own needs
  - Extent to which they understand obligations of provider and channels for complaint.

### **Products and services**

*Note: Many of the answers to these questions will have been touched on already, so introduce these questions by recapping what participants have already said and use these to gather additional detail only if necessary.*

4. Which of products/services do participants use and for what purpose?
- Who uses what? Probe use of digital financial services, such as mobile phone ownership and use of mobile banking, ATMs, point of sale, role of agents
  - What do they use these for different purposes and why? Probe on different financial needs:
    - Day-to-day purchases
    - Managing business money to buy stock, and so forth
    - Remittances from migrant working elsewhere, to other family members, and so forth
    - Saving for short-/medium-term need, for example, school fees, fertilizer, assets, and so forth
    - Saving for longer-term need, such as wedding, funeral, education
    - Paying for emergencies such as health expenses
  - Are they aware of products and services on offer that they don't use? Why?
  - What financial needs do they have that are not met by the products/services on offer?
  - What are the reasons that people access/use certain products and services and not others?
  - Probe the extent to which participants make informed choices or are following lead from what others are doing; for example, are being advised by someone what to do; are doing what they do because they don't see a choice, because, for example, husband doesn't think they should have a mobile phone.
5. What do customers feel that the FSPs could do to improve channel and service delivery? This helps define customer needs but also gives a sense of how empowered they were to be able to define alternatives/improvements. Where concerns are raised, this should be followed up by asking whether this concern/suggestion has been raised with the FSP or anyone else.



### 3.4 Customer empowerment statements

Many of the issues in the framework should have been covered in the discussions up to this point, which has focused on customer experience. The next set of questions is more focused on customer capability and gets closer to the notion of empowerment, looking at the three dimensions in the framework.

Use the three sets of statement cards. There are two cards relating to each dimension—choice, use, and voice.

1. For each, show the participants the two cards that represent two extremes and ask them to indicate where they lie personally in terms of their own experience—at one extreme or the other or somewhere in-between.
2. Ask why they have placed themselves there.
3. Probe the experience and customer journey that has led to this answer. The statements are quite high level, and therefore probing may be needed to help customers understand what is meant by the statement and to explore the experience and the results. Refer to the framework questions and key points summarized below.

Statement	Probing
I can choose which FSP will be best for me.	This implies knowledge of the customer’s needs and the products and differences between providers. A lack of knowledge may lead to a person being positive, whereas a more empowered customer may be more aware of their own limitations.
I am able to use the services on offer and make the most of them.	This implies both access to the service, and personal capacity in terms of understanding and ability to use, experience that builds confidence and trust, and actions by the FSP to facilitate use.
I talk to my service provider about what I need or want.	This is partly about knowledge and confidence of the customer, but it is also the channels and processes that the FSP has, so that voice does not depend just on the customer raising her or his voice.

4. Ask the participant to reflect on these statements and to tell you in what circumstances they would judge themselves to achieve the most positive situation. What would need to change in their knowledge, capacity, experience, and so forth? What would need to change in terms of the product or service and the service provider?

## 4. Individual interviews

The interviews are focused on understanding the specific experience of participants. They are structured around touchpoints with FSPs and use the three dimensions in the framework to probe. Look for tangible examples of actions and experiences that have served to empower or disempower.

Individual interviews are also useful for talking about aspects of the use of financial services that participants may not be comfortable talking freely about in public, such as lack of self-confidence, the experience of other group members, or negative experiences.

#### 4.1 Introduction

- If the participant has been part of the FGD, then just a brief recap is needed on the purpose of the visit. If the participant has not been part of the FGD, then refer to the introduction for the FGD.
- Ensure that profile information is collected, such as main livelihood sources, marital status, migrant members in family, education level, and age (factors such as ethnicity or caste can be determined in the selection of participants rather than through direct questions).
- Recap the products/services the customer has accessed. Probe to understand how long the customer has used each and to identify those consistently used, those used intermittently, and those that have been tried and then rejected or the use of which is dormant.

#### 4.2 Discussion of products, services, and channels

- What financial products/services are available?
- Which do you use/not use and why?
- What are the benefits to you of using these financial products and services?

*Depending on context, either use cards to talk through products, services, and channels in the same manner as the FGD (described below) or discuss these issues without cards.*

#### **Channels and providers**

1. Using the pre-prepared cards, talk through with participants what providers are locally available. Probe whether anything is missing, and if so, add a hand-written card.
2. Discuss positive and negative features of each of the channels/providers
  - Prepare two cards, one with a smiley face 😊 and one with a sad face ☹️.
  - For each provider/channel, ask participants to place it on the happy/sad card or in-between, asking “*why would someone be unhappy/happy using this?*” Note: Do not ask why are you happy/unhappy or “are you happy,” but keep the question generic so as to focus on the general not just the individual experience to get to aspects that are perceived as positive or negative.
  - Probe reasons for things being good or bad.
  - Probe what people do in response to negative experiences. Ask for specific examples.
  - Probe customer journey and how experience has evolved over time. Ask the customer to talk through the process of engagement, covering access, choice, use, and voice, focusing on the specific decisions and touchpoints they have experienced. For each, probe:
    - What happened?
    - What did you do?
    - What did FSP do?
    - How did you feel?
    - What was the result of this interaction?
3. What do customers feel the FSPs could do to improve channel and service delivery? This helps define customer needs, but it also gives a sense of how empowered they were to be able to



define alternatives/improvements. Where concerns are raised, this should be followed up by asking whether this concern/suggestion has been raised with the FSP or anyone else.

#### **4.3 Customer empowerment statements**

Many of the issues in the framework should have been covered in the discussions up to this point, which has focused on customer experience. The next set of questions is more focused on customer capability and gets closer to the notion of empowerment, looking at the three dimensions in the framework.

Use the three sets of statement cards. There are two cards relating to each dimension—choice, use, and voice.

1. For each, show the participants the two cards that represent two extremes and ask them to indicate where they lie personally in terms of their own experience—at one extreme or the other or somewhere in-between.
2. Ask why they have placed themselves there.
3. Probe the experience and customer journey that has led to this answer.
4. Probe other aspects outlined in the framework.
5. Ask the participant to reflect on these statements and to tell you in what circumstances would they judge themselves to achieve the most positive situation. What would need to change in their knowledge, capacity, experience, and so forth? What would need to change in terms of the product or service and the service provider?

### **3. Data capture and analysis**

#### **Analysis and reporting**

A sample report is available from the pilot research in India. This section briefly summarizes the data processing, analysis, and report-writing process.

***Data processing and coding:*** Data should be processed and coded looking at the customer profile and the three dimensions in the framework. Key is to disaggregate the customer experience and aspects of empowerment in relation to the different contextual and personal factors that are present.

While the three dimensions—choice, use, and voice—are useful as an overall framework, they proved to be too general for coding the data. Instead, it makes sense to focus on themes that arise, and to look at how experience in relation to these themes varies in relation to the experience of different customers. So, for example, in one focus group there may be customers with two or three different profiles. Those from another focus group with a similar profile would be grouped together.



**Customer personas:** In India, a typology of customers became apparent that allowed for customer “personas” to be defined, and data from customers with similar profile and experience could be grouped for the purposes of analysis, rather than presenting data from each interview or focus group discussion. In the India pilot, themes that emerged included, for example, literacy, education, personality, confidence, leadership, trust, reliability, and gender (see the report for the full list).

From this analysis, *customer personas* can be developed that describe the profile factors and the typical experience of choice, use, and voice of these customers based on the interview. In the India report, for example, personas defined were: rural woman nonusers; rural woman basic users, self-help group member; rural woman more empowered user, self-help group member; individual new bank user; low-income man; migrant men; “patron” man<sup>1</sup>; and married urban women.

**Analysis by dimension:** The range of experience in each dimension should be analyzed and presented using the questions in the framework as guidance. In the Indian pilot, it made sense to group this by factors relating to customers and service providers separately.

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<sup>1</sup> A “patron” man is a person with a strong patronage relationship with an employer who manages the patron man’s financial transactions on his or her behalf.