

Do UPI In-App Grievance Redress Mechanisms work for constrained users?

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Summary

Digital financial services in India are growing at a rapid pace – most visible in the case of Unified Payments Interface (UPI) system. However, in the absence of effective grievance redress mechanisms (GRMs), these services leave customers without necessary recourse and become difficult to trust.

In this interim report, we document our observations about the user interface of In-App GRMs in UPI applications (UPI Apps). Our observations are based on our review of the customer redress journey on these GRMs – mainly in terms of the GRM’s accessibility and usability – from the lens of a low-income, digital immigrant customer. Broadly, we note –

- i. Some apps don’t allow users to raise complaints from an In-App GRM.
- ii. When available, In-App GRMs are often not placed prominently on the screen.
- iii. Most UPI apps give users information that can help them resolve some concerns on their own, but very few do so in vernacular language.
- iv. The In-App GRMs only capture payment-related complaints. Either they leave out or make it difficult to make non-payment-related complaints.
- v. There is inadequate support in vernacular languages.
- vi. Complaint-tracking mechanisms on the In-App GRM are difficult to use

We also present some indicative measures that providers could try, such as (i) improving alignment with regulations, (ii) conducting usability testing exercises with constrained users, (iii) building users’ awareness, and (iv) using grievance data as feedback to improve their services.

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I. Introduction: User challenges in seeking redress in financial services

Users of financial services face many challenges when they approach Grievance Redress Mechanisms (GRMs). They are often unaware that there is a GRM they can approach when they face an issue. Users who are aware of a GRM find locating the GRM option and navigating it to file complaints difficult. The GRMs themselves demand users to follow difficult and technical procedures before admitting a complaint, raising high barriers for users seeking redress. Finally, the quality of redress is poor due to high rates of rejection, undue delays, and unsatisfactory resolution.¹

These challenges discourage users from seeking redress when they face an issue. This effect disproportionately affects rural, low-literate, and digital immigrant groups.² Our ongoing work suggests that, although most of the microfinance borrowers in the Microfinance Network of India (MFIN)'s network are women, more men approach its GRM. This implies that the main benefactors face difficulties in directly approaching the GRM. Geographically, the Reserve Bank of India's (RBI) figures for complaints from rural India suggests that rural users are refraining from making complaints about payment services despite increasing uptake. In 2020-21, the RBI Ombudsman for Digital Transactions received only 2,946 complaints. This already appears low given the vast uptake of digital payments in the country. Of this, only 10% were from rural areas.³ The RBI's Annual Ombudsman Report 2021-22 reports a further decline in all payments-related complaints except mobile and electronic fund transfers/mobile banking.⁴

The lack of effective redress not only leaves users vulnerable but also crushes their trust in the provider and the service for not providing recourse when they need it. GRMs in financial services should be more user-friendly and accessible to address this concern. In this context, we are undertaking a project to improve GRMs in the financial sector – beginning with In-App GRMs of UPI Apps.

In the UPI app environment, the In-App GRMs are intuitively the first level of redressⁱⁱ that users can approach when they have a grievance. While providers offer a helpline, website, and appoint a Grievance Redress Officer, these details may often be a level or two deeper on the app interface and less instinctive to reach compared to the In-App GRM. As a result, the In-App GRM becomes our focus of analysis. ***However***, given the lack of visibility into the back-end functioning of In-App GRMs, most of the insights in this report are limited to an assessment of the accessibility and usability of the In-App GRM's user-facing interface.

ⁱⁱ Post the In-App GRM, users can escalate their grievance to the UPI providers' partner bank (or the Payment Service Provider Bank), their own bank, the NPCI, and then to the Integrated Ombudsman of the Reserve Bank of India. See [*UPI Dispute Redressal Mechanism*](#).

The next section (**Section II**) of this report presents our motivations for studying GRM in UPI. **Section III** details the methodology we followed for conducting the analysis in this report. **Section IV** presents our findings from analysing In-App GRMs of prominent Payment Service Providers (PSPs)ⁱⁱⁱ and Third-Party Application Providers (TPAPs).^{iv} The concluding **Section V** synthesises what the findings mean for constrained users using In-App GRMs and proposes some measures providers should take to improve their In-App GRMs.

II. Motivations for studying UPI In-App GRMs

UPI payments grew by almost 66% between February 2022 and February 2023. They constitute 75% of the digital payments in India,⁵ becoming an everyday means of making smaller-value payments. Our recent study suggests that UPI is also penetrating tier-2 and tier-3 cities.⁶ UPI's penetration in these areas may further increase through facilities like *UPI Lite* which make UPI payments more convenient in these contexts.⁷ UPI is therefore heading towards greater uptake by newer users who are not familiar with digital payments.

The In-App GRM should complement this uptake, in the absence of a robust human touchpoint for redress, by presenting an accessible and effective way to deliver redress. Such an In-App GRM provides a warranty that the provider will address any concerns that users have with its services. It helps the provider achieve three things: (i) uphold the quality of services promised to the user, (ii) build trust with the user, and (iii) offer better protection to the user. The lack of proper redress on a UPI app can make users stop using that app, and sometimes stop using UPI altogether.

Yet, our work on constrained users' experience with redress tells us that In-App GRMs do not meet this standard. Users' satisfaction with redress in UPI is less-than-ideal at best.⁸ For instance –

- i. In-App GRMs are difficult to locate and navigate for many constrained users. These users are likely to onboard themselves and learn about using UPI apps through friends and family. Their onboarding is often limited to rote-learning how to make a payment and rarely extends to learning about redress. They do not understand the app's information architecture to navigate through it and locate the In-App GRM.
- ii. Users do not find effective resolution when they lose money to frauds or to unauthorised transactions. In cases when money is stuck in a transaction, automatic reversals often take more than 7 days – more than the turn-around-time (TAT) stipulated by the RBI.⁹
- iii. Our ongoing social media monitoring exercises^v tell us that users' grievances are not just limited to payments (like payment delays or failures). They extend to the quality of service offered by the provider, such as unsuccessful UPI onboarding, poor app performance etc. (Figure 1). However, current In-App GRMs do not always account for them.

ⁱⁱⁱ A PSP is a bank which may provide the end-user with UPI services through its own app, or through a TPAP's app. See more [here](#).

^{iv} A TPAP is a technology service provider that participates in UPI payments through a partner Payment Service Provider bank. See more [here](#).

^v The exercise analysed concerns raised by customers in more than 4 lakh Tweets on Twitter and more than 2.5 lakh customer reviews on Google Play Store between January 2020 and June 2022. This exercise revealed approximately 44.32 times more data points compared to the complaints presented in the RBI's Annual Ombudsman report.

Figure 1: Findings on user concerns from Dvara Research’s ongoing social media monitoring exercise

Issue	Share of reviews
Delayed transactions	16%
Unsuccessful verification/login	16%
Failed transactions	14%
Technical failure	12%
Unsatisfactory grievance redress	12%
Technical inaccessibility	10%
Poor app performance	5%
Poor third party experience ¹	1%
Ambiguous ²	14%
Non-pertinent clusters ³	1%

Analysis of Playstore complaints

Issue	Share of reviews
Unsatisfactory grievance redress	29%
Failed/pending transactions	20%
Technical inaccessibility	13%
Fraud reports	11%
Poor third party experience ¹	8%
Account inaccessibility	3%
Ambiguous ²	13%
Non-pertinent clusters ³	2%

Analysis of Twitter complaints

¹ Poor third party experience refers to experience with using UPI for third party services like bill payments, phone recharge etc.

² Ambiguous refers to posts (Comments/Tweets) that could not be categorised into one category or which did not provide enough information to determine if they are a grievance.

³ Non-pertinent clusters refer to spam posts or promotional content.

These user experiences motivate a singular goal for providers with respect to their In-App GRMs: *the GRM should be as accessible, effective, and user-friendly as possible.*

Providers should thoroughly re-evaluate and redesign current UPI GRMs towards meeting this goal. Such an exercise can help UPI providers provide better recourse and, at the same time, improve UPI uptake by new users.

III. Methodology for analysing In-App GRMs

The scope of the study is limited to the user-facing front-end of the In-App GRM – determining how accessible and responsive In-App GRMs are. We specifically analyse the user experience (UX) for users going through the redress journey. We use an assessment framework that draws from the international standards for principles of redress (see (2), below).

We did the study in 4 broad stages.

1. **Selecting the UPI apps for assessment:** We selected UPI apps of TPAPs and PSPs that the research team was personally using or had access to. This includes –
 - i. **Four prominent TPAPs** of which three TPAPs enjoy the majority market share in the UPI ecosystem, and the fourth a smaller market share. The selected TPAPs are identified in this report as TPAP 1, TPAP 2, TPAP 3, and TPAP 4, respectively.
 - ii. **Two prominent Payment Service Providers** (i.e., PSPs or UPI apps offered by banks) from among the top six PSPs in the UPI ecosystem (identified in this report as PSP 1 and PSP 2).¹⁰
2. **Identifying the principles of redress against which In-App GRMs are assessed:** Our assessment framework consists of **five principles** (see Table 1 below). These principles are crystallised from

well-established principles of grievance redress^{11,vi} and corroborated with the ICODR Payment Online Dispute Resolution (ODR) Standards.¹² This corroboration was necessary in the backdrop of the RBI and the National Payments Corporation of India (NPCI) mandating digital payments providers to put in place ODR systems for resolving user grievances and disputes.^{13,vii} The principles are also verified against the NPCI’s Guidelines and Circulars concerning grievance redress.¹⁴

Table 1: Assessment Framework for In-App GRMs

Principle	Description
Accessibility	<p>The In-App GRM should be easily accessible to users i.e., In-App GRMs should be –</p> <ul style="list-style-type: none"> i. Displayed prominently for users to easily identify it. ii. Supported by Frequently Asked Questions (FAQs) and other information that can guide users towards using it. iii. Easily accessible. iv. Easily navigable. v. Comprehensible to users with different literacy levels and language preferences. <p>At the same time, users should have access to alternative channels for seeking redress.</p>
Seamlessness	<p>There should be a single, integrated front-end through which users can report grievances complaints without having to approach different channels for different grievances.</p> <p>This front-end should integrate with a coordinated back end that allows providers to –</p> <ul style="list-style-type: none"> i. triage grievances in an efficient manner for resolution, and ii. have visibility over the status of resolution in the UPI ecosystem.
User-facing transparency	<p>The In-App GRM should acknowledge receiving users’ grievances and give them straightforward ways to track the status of its resolution. The GRM should also give users visibility on the status of resolution at the back end (for example, which entity in the ecosystem is processing the grievance).</p>
Objectivity	<p>The In-App GRM should treat grievances of the same category and the same priority/urgency objectively, without any bias, and in a manner consistent with regulation and established protocol.</p>
Timeliness	<p>Users should receive redress in a timely manner, with quick TAT. Further, In-App GRMs should –</p> <ul style="list-style-type: none"> i. proactively identify and address grievances when possible, and

^{vi} The principles draw from a GRM assessment framework developed by Anubhuti Singh and Beni Chugh on a parallel project on grievance redress at the Future of Finance Initiative at Dvara Research. The outputs from this work are forthcoming.

^{vii} The RBI has statutory authority to regulate payment systems in India, including UPI, under the Payment System and Settlements Act, 2007. The NPCI operates the UPI system and issues regulations governing how PSPs and TPAPs offer UPI.

	ii. offer information that facilitates pre-conciliation or self-resolution of certain grievances.
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3. Analysing the In-App GRMs against the principles of redress: We analysed the In-App GRMs in two stages, between November-December 2022:

i. Using the In-App GRM in English: We used the In-App GRMs to seek redress against specific payments that were successful, pending, or declined. We documented the process flow at each step of the redress journey: how the redress channel was designed, what kinds of complaints were admissible, what kinds of resolution were offered, and what means were available to track complaints. We present some of these findings through screenshots of app interfaces (see Appendix) which most prominently illustrate our findings. The intention behind reproducing these screenshots is not to single out a provider. All identity markers of the providers are blanked out (logos, colour scheme, etc.), so that they are purely illustrative in nature. We did the analysis on phones operating on the Android OS.

While we conducted the study between November-December 2022, some additional screenshots of the UPI In-App GRMs were procured in March 2023, at the time of finalising the report. The analysis in the report has been updated in case relevant changes were observed in the later screenshots of In-App GRMs.

ii. Using the In-App GRM in vernacular language: We used the In-App GRMs again, like in (i), but in vernacular – specifically Hindi and Telugu. We did this by changing the In-App language, and separately the phone language. This helped us understand how the GRM interface changes when the app language and phone language change.

4. Conducting stakeholder conversations: We spoke to user interface (UI) and user experience (UX) design experts, and GRM and ODR experts for their inputs and feedback on our findings. Section IV of this report incorporates these inputs.

Owing to our methodology of using UPI applications to understand the UX, we have limited insight into the back-end functioning of In-App GRM. Accordingly, the **framework does not assess back-end aspects** such as the selected UPI providers’–





































- i. Integration with the UPI ecosystem.
- ii. Data protection and confidentiality measures with respect to users’ grievances.
- iii. Back-end redress protocols.
- iv. Organisational structure and their ability to perform their grievance redress role independently without influence from other interests.
- v. Accountability to industry bodies, self-regulatory organisations (SROs), and regulators.

We were also unable to rigorously verify providers’ compliance with NPCI-specified TAT as we did not have similar complaints across providers that we could test.

IV. A closer look at the In-App GRMs

By closely observing the user journey of grievance redressal on the selected UPI applications, we note the presence and/or absence of some key user functionalities (Figure 1).

Figure 1: Presence/absence of grievance functionalities across UPI applications

Feature of In-app GRMs	TPAP 1	TPAP 2	TPAP 3	TPAP 4	PSP 1	PSP 2
Provided information/FAQs for self-resolution						
Able to raise complaint						
Ticket number assigned						
Screen confirming receipt of complaint						
Grievance system available in multiple languages						
Status update on grievances						

Although these In-App GRMs meet certain criteria on first look, they *qualitatively* fall short on different grounds. We present our key observations below.

1. Some apps do not allow users to raise complaints from an In-App GRM

- The principle of accessibility requires GRMs to be easily available to the user. The NPCI also specifies that users should be able to raise complaints/disputes directly from the UPI application.^{viii} By scanning the user journey navigating the GRM, we found that only four of the six apps studied permitted users to raise complaints through In-App GRMs.
- Users of these apps could raise disputes against completed transactions from the landing page after transaction completion, or by navigating to the *transaction history* screen.

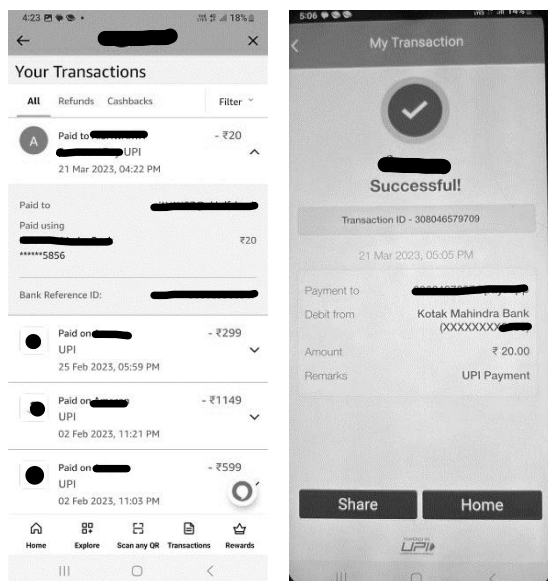
^{viii} The NPCI Circular “[UDIR – Enhancing Complaint handling & resolution process for UPI transactions](#)” states, “Following are the key propositions, which ecosystem participants needs to enable for facilitating online dispute resolution of customer complaints for UPI transactions:

A. Payer App

1. To enable raising of complaint/dispute from UPI App.”

It is unclear why the remaining two UPI apps studied do not provide grievance functionalities to users.^{ix} These apps directed users to other channels through which customers could access grievance redressal, such as grievance helplines, grievance officers, etc. However, the absence of in-app grievance functionalities in these two apps leaves a large gap in redress. The In-App GRM is the first port of call for users for airing their grievances compared to other channels that are less instinctual and deviate from the app language of users fully performing tasks on the app. The In-App GRM is also a relatively low-cost and seamless access point for users compared to a grievance helpline or grievance officer.

Illustrative Figures 2 & 3: Absence of grievance functionalities on UPI applications



2. When available, In-App GRMs are often not placed prominently on the screen

The principle of *accessibility* requires GRMs to be easily available and navigable for the user. GRMs should be in a prominent section of the user’s screen so that they are prominently visible.

However, In-app grievance functionalities did not meet this standard across the apps surveyed:

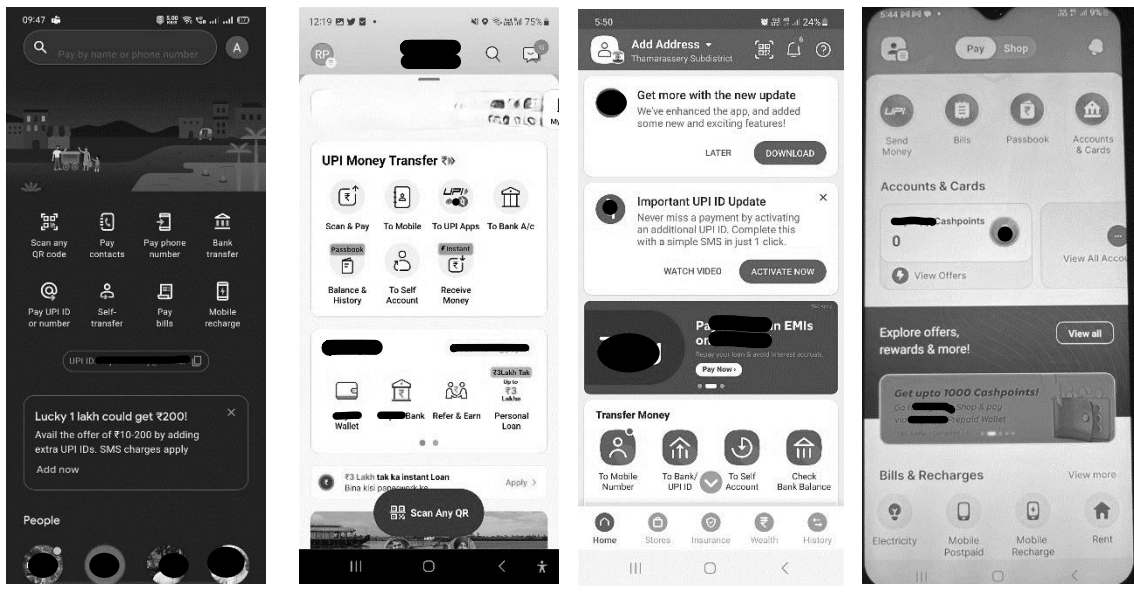
- The Home pages of UPI apps do not explicitly display that grievance mechanisms are available to the user (Figures 4-7).
- Other parts of the application that the user interacts with (such as the screen arising after completion of payment) do not direct them towards grievance functionalities either (Figure 8-11).

Instead, grievance facilities had to be accessed through the transaction history page located one-level deeper in the app’s user interface. Within these pages, the In-App GRM option was sometimes displayed in a non-prominent location (like the corner or bottom of a screen), demanding greater attention from the users.

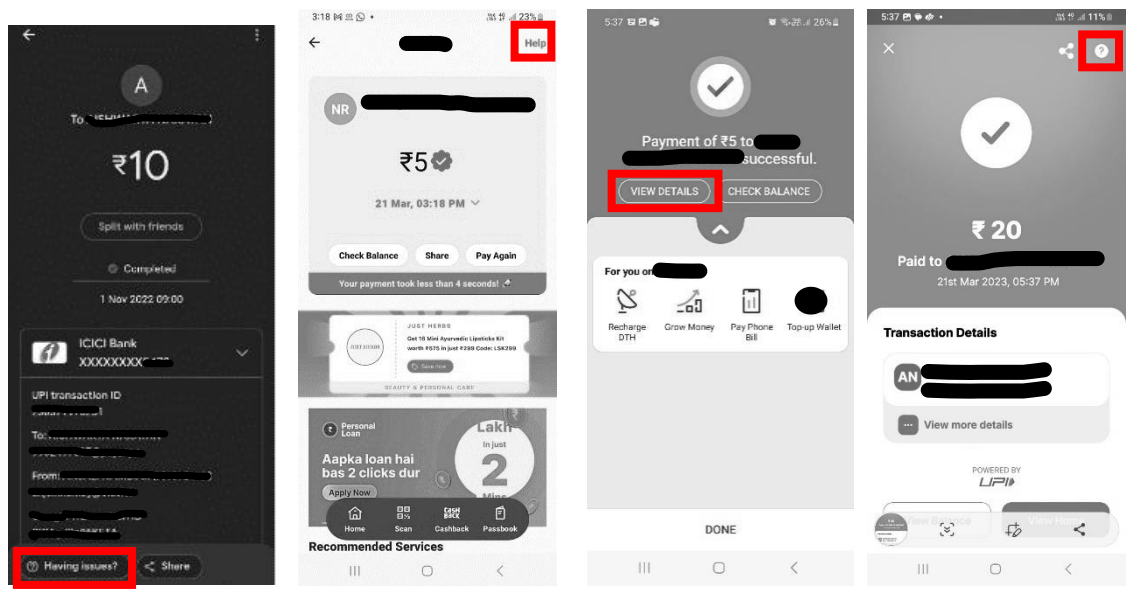
^{ix} In [August 2020](#), the RBI advised payment system operators (including TPAPs) to implement online dispute resolution (ODR) processes for customer complaint handling. The UPI Steering Committee discussed implementing the same through the Unified Dispute & Issue Resolution (UDIR) approach, and accordingly the NPCI ([in November 2020](#)) instructed TPAPs to enable such grievance mechanisms on their application platforms. Since then, the NPCI has followed up with circulars in [October 2021](#), [April 2022](#), and [August 2022](#) revising the timeline within which TPAPs had to comply. The [most recent deadline](#) for compliance was 30 September 2022.

The home pages of some of these applications have multiple competing visual elements, such as advertisements and information updates, that are not as important for the user. These elements crowd out and obscure the GRM.

(Illustrative) Figures 4, 5, 6, & 7: Absence of GRMs on Home pages of UPI apps



(Illustrative) Figures 8, 9, 10, & 11: In-App GRM Functions are not prominently displayed



It is also not easy for the user to navigate to the GRM from other screens. For instance, the GRM options which appear after a transaction were placed obscurely in a corner at the top or bottom of the screen. In some cases, the option was indicated through small icons or behind other options (like 'View details' in Figure 10) that do not readily reveal the presence of GRM options.

The minimal screen space dedicated to GRM options, their crowded placement, and ambiguous iconography makes them hard to find and use. This is especially so for new-to-digital users who do not intuitively understand how to navigate an app to find the GRM.¹⁵ Our usability testing exercises with UPI users suggests that such design causes significant cognitive overload on their minds and nudges them away from using the GRM.¹⁶

3. Most UPI apps give users information that can help them resolve some concerns on their own

The standard of *timeliness* requires GRMs to facilitate quick grievance resolution. One way to do this is to give users information that can help them self-resolve grievances before escalating them to the In-App GRM. At the back end, this approach could ease the volume of complaints processed by the formal GRM, and ensure the system has capacity to handle more critical complaints. However, such information will be useful only when it is accessible to users. For instance, the GRM should speak the users' language i.e., not just through vernacular but also through relatable phrasing and iconography familiar to them.¹⁷

We observe the following:

- Most UPI apps provide information useful for self-resolution through FAQs and video tutorials. This information usually focuses on common grievances that users may face (like money being stuck in a transaction), and how they can be resolved.
- Only one of the four UPI apps that offered FAQ pages/video tutorials curated content in regional languages. The remaining three apps supported only English, becoming inaccessible to users without adequate English literacy. This lowers the *accessibility* of the GRM and slows the *timeliness of redress* mentioned above.
- One of the apps studied provided only an FAQ page to users, without allowing them to also raise formal complaints. This feature does not do much towards providing accessible redress or building user trust in the absence of a fully functional grievance mechanism (indicating poor *accessibility*).

4. The In-App GRMs only capture payments-related complaints but omit many non-payment-related complaints

The principle of *objectivity* requires GRMs to treat all grievances validly with due regard to their urgency and severity. It intersects with the principles of *accessibility* (i.e., allowing users to air any grievance they face without limitations), and *seamlessness* (i.e., having a single, integrated front-end through which users can report grievances and a coordinated back-end that can triage and process grievances). These principles give users more flexibility and give providers more visibility over the types of issues their users encounter while using their product.^x Related to these principles, we found that:

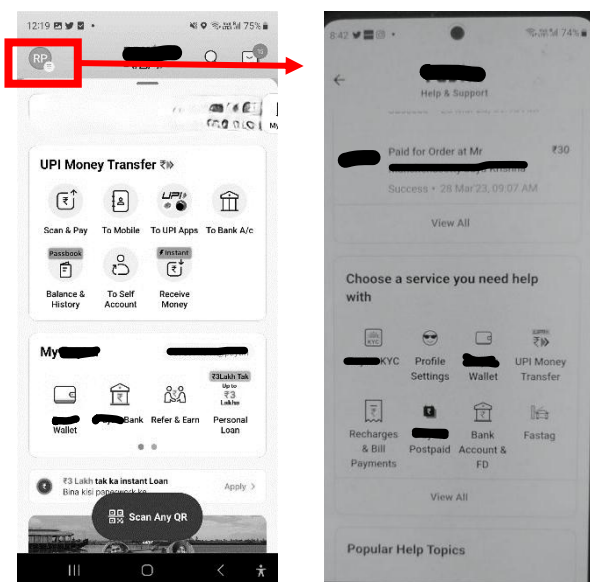
- While GRMs are well equipped to capture a wide spectrum of payment-related complaints, the user's ability to raise non-payment related complaints is constrained. Some apps do not accept any non-payment related queries from the user. Those that do require the user to navigate some pages deeper from the home screen (Figure 12). As discussed above, users struggle to locate and navigate options located in this way. Further, separating payments and non-payments related

^x It is unclear to us whether the applications employ some form of automation to pre-populate the complaint categories presented to customers. If such automation exists, care must be taken to ensure that such automation does not result in a biased view of the spectrum of issues that customers face. This maps to the ICODR principle of *equality*, which requires that 'artificial intelligence decision-making must not create, replicate, or compound bias'.

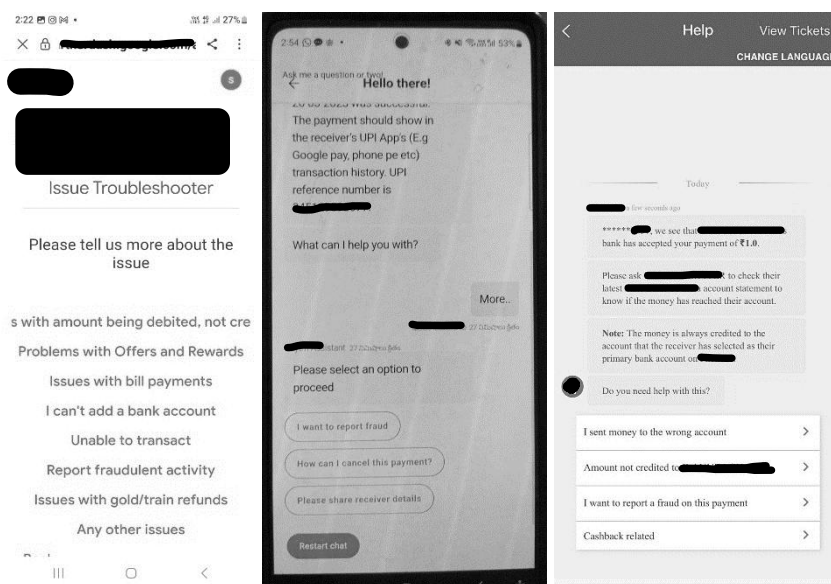
grievance functionalities increases the burden on an already constrained users bear in locating them and adds friction to the redress process.

- There are limited options through which users can raise grievances regarding issues outside the predetermined list. While some apps provide an ‘Other’ option, most have minimal functionality to capture new types of complaints. For instance, some apps redirect the customer to FAQ pages where additional information is provided to help the user resolve the problem (Figure 13). In one application, this information is available only in English. Further, only one of the apps allows the user to submit a complaint in their own words, through a text-based interface (Figure 16). For other apps, it is unclear whether the GRM will be able to capture various types of issues that may arise as UPI usage and adoption becomes more widespread.

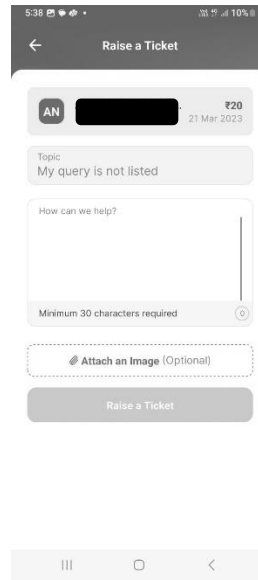
(Illustrative) Figure 12: Non-payment complaints are a level deeper in the app interface



(Illustrative) Figures 13, 14, & 15: ‘Other’ option is limited/unavailable



(Illustrative) Figure 16: One app permits users to submit complaints in their own words



5. There is inadequate support for vernacular languages

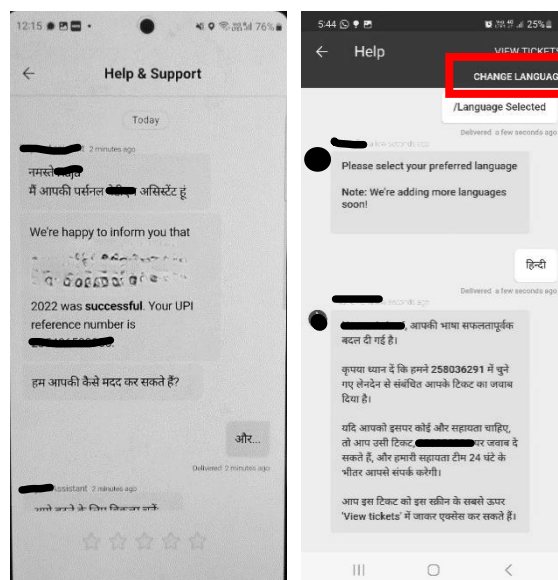
The principle of accessibility requires GRMs to be available in different languages to cater to different linguistic user groups. From a design point-of-view, this means providing (i) support in vernacular is important to match the needs of different user segments, and (ii) easy and prominent shortcuts using which users can toggle languages.¹⁸

Against this context, we find:

- Two of the apps did not support any languages except English.
- The placement of language settings in most UPI apps was not prominent. Only one of the apps explicitly prompted users to toggle between the language of the GRM chatbot (Figure 18).
- One of the apps studied did not have fully translated content even after changing the app language through the app settings (Figure 17).
- In one of the UPI apps, the FAQs were in English despite other content being in vernacular.

The lack of proper multi-language support alienates those unfamiliar with English from the grievance mechanism. It excludes such users from the GRM altogether.

(Illustrative) Figures 17 & 18: Vernacular languages in UPI applications.

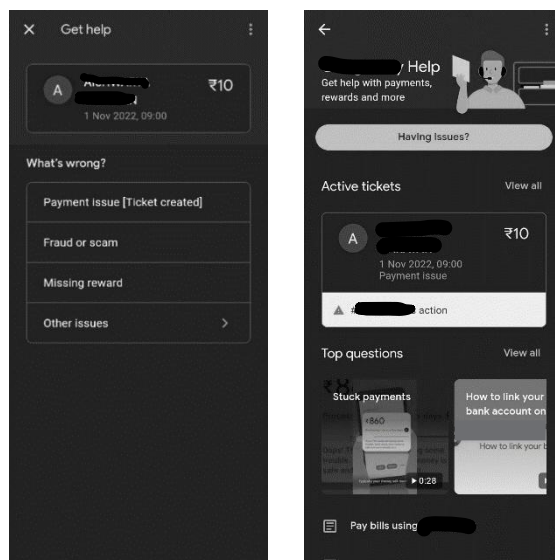


6. Complaint-tracking mechanisms on the In-App GRM are difficult to use

The principle of transparency requires GRMs to give users uncomplicated ways to track their grievance and give them visibility into the status of resolution at the back-end. From a design perspective, this means that the GRM should give users updates on their complaint status or give automatic updates so that users do not have to manually track complaint status.

We observed that the tracking mechanisms on the selected UPI apps are challenging for users. The In-App GRMs don't prominently display the details of complaint status or expected TAT to the user. One UPI app requires users to separately navigate to the *Help* section to view grievance status updates, away from the transaction history section where the grievance may be raised. The app also does not give the user a grievance ticket number, making it hard for users to track their complaint. This affects the visibility of the system status, hiding key information from users about their complaint.

(Illustrative) Figures 19 & 20: User must navigate separately to a page for updates on resolution status



V. Do In-App GRMs work for low-income users?

Users from lower income segments rely on their friends and family to learn how to use a UPI app. This onboarding is generally limited to rote-learning the steps for making a payment. Users do not have enough avenues to learn how to intuitively navigate the app.¹⁹ This user segment may also have lower literacy rates and may not be digitally savvy enough to intuitively understand the information architecture on UPI apps. These lived realities call for designing In-App GRMs in a way that minimizes barriers. However, our preliminary assessment of In-App GRMs shows that they raise multiple barriers for users who want to air grievances and seek redress (Table 2, below).

We observe that the GRMs in question do not meet the standards of *accessibility*, *seamless redressal*, *objectivity*, and *transparency to the user*. Especially concerning are the gaps in accessibility standards, since the objective of hosting these GRMs on the UPI application is to ensure that the grievance functionalities are just as accessible as the payment service itself. The absence of these standards points to a poor-quality experience resolving a UPI-related grievance. A substandard GRM signals that the TPAP is not trustworthy, especially for low-income, digital immigrant users. This may cause users to discontinue their use of the app.

Providers should make their GRMs more user-centric, especially as constrained user segments are increasingly taking to UPI services. TPAPs and PSPs are presented with a timely opportunity to signal trustworthiness and high-quality to users who may otherwise be apprehensive about digital financial products. Designing GRMs which are easy to use and friendly in their design is an easy way for providers to inspire confidence and acquire a permanent user base.

In Table 2 below, we summarize our major takeaways from this exercise along with corresponding calls-to-action for TPAPs/PSPs to consider towards improving their In-app GRMs. We envision four potential categories of action for the TPAP/PSP:

- (i) **Better compliance with regulations:** The RBI and the NPCI has already issued regulations and some guidelines concerning In-App GRMs. Providers can focus more on complying with these guidelines to improve the GRMs (*Follow up actions #1, 10*)
- (ii) **Conducting usability testing exercises with constrained users:** Providers should deliberately conduct design audits and usability testing exercises with different constrained user groups. These exercises can not only reveal existing barriers in the In-App GRMs but also give more insight into potential design solutions making the GRM more intuitive and user-friendly (*Follow up actions #2, 4, 5, 6, 8, 11, 12, 13, 14*).
- (iii) **Build users’ awareness:** Providers can focus on improving users’ awareness about GRM through different channels. This may take place (a) asynchronously through advertisements, public campaigns, and app notifications, and (b) synchronously when users make a payment (*Follow up action #3*).
- (iv) **Use grievance data as feedback to improve services:** Providers can analyse data on grievances aired by users to better understand (a) the different kinds of grievances can users need support with, and (b) understand the root causes of those grievances to address them at the back end (*Follow up action #7*).

Table 2: Summary of findings and follow-up actions for providers

Observation	Unmet GRM principle	Follow-up action for providers	User outcomes
<i>Grievance functionalities absent</i>	Accessibility	1. Comply with guidelines on grievance redress from the NPCI ²⁰ and RBI ²¹ towards instituting accessible GRMs on the UPI application.	1. Users can air their grievances easily. 2. Users are more confident about receiving redress.
<i>In-app GRMs are not made salient to users</i>	Accessibility	2. Conduct usability testing exercises with constrained users towards making the GRM user journey more intuitive. For instance, the provider may: <ul style="list-style-type: none"> ○ Feature grievance functionalities prominently on the home page, such that it is not competing with other options for users’ attention. Use intuitive iconography. ○ Provide alternative channels of seeking redress (including offline channels). 3. Conduct awareness campaigns to familiarise users with UPI GRMs. 4. Prompt users to navigate to the	3. Users know there is a forum where they can conveniently air grievances. 4. Users experience lower cognitive load when using In-App GRMs.

		<p>GRM section using app design. This may be done by simplifying the app interface such that essential user tasks are prominently accessible.</p> <p>5. Design the app interface with prominent visual cues directing the user to the GRM.</p>	
<p><i>Limited scope of accepted complaint categories</i></p>	<p>Accessibility</p>	<p>6. Permit users to input other grievances (that may not feature in a pre-populated drop-down list) through multiple channels such as text and voice modes.</p>	<p>5. Users have flexibility in airing grievances without being limited to a few types or channels.</p>
	<p>Seamless Redressal</p>	<p>7. Enable users to select the most appropriate complaint category through illustrative examples or further details.</p>	<p>6. Users receive better services when providers address root causes of grievances.</p>
	<p>Objectivity</p>	<p>8. Regularly analyse of incoming grievance data to expand the list of grievance categories for users to select from.</p>	
<p><i>Difficult to track complaints</i></p>	<p>User-facing transparency</p>	<p>9. Display tracking ID to the user after a complaint is raised.</p>	<p>7. Users have more visibility into the status of their grievance</p>
		<p>10. Update the user on status of resolution through multiple channels such as in-app notifications, SMS, and IVR call back. Such a communication should include the status of complaint resolution, along with action required from the user.</p>	<p>8. Users feel more confident about the provider working towards resolving their grievance.</p>
		<p>11. Ensure integration with NPCI's UDIR system, so providers have visibility on the status of resolution by other stakeholders in the ecosystem (such as banks).</p>	
<p><i>Inadequate support for vernacular-languages</i></p>	<p>Accessibility</p>	<p>12. Enable support for vernacular languages across the GRM journey (including GRM</p>	<p>9. Users are not excluded from the GRM.</p> <p>10. Users can easily make the In-</p>

		<p>chatbots, FAQ pages) using language that users are familiar with.</p> <p>13. Prompt users to toggle the language change on the grievance screen.</p> <p>14. Design GRMs to support IVR/voice-based resolution.</p> <p>15. Incorporate standardised icons/visual aids for users to promote familiarity with the interface.</p>	<p>App GRM more suitable to their needs.</p>
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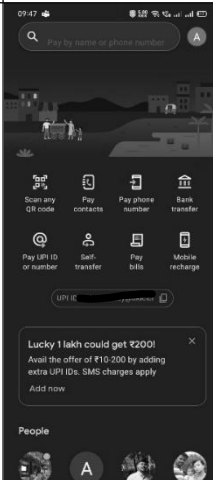
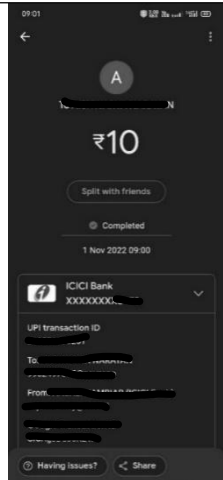
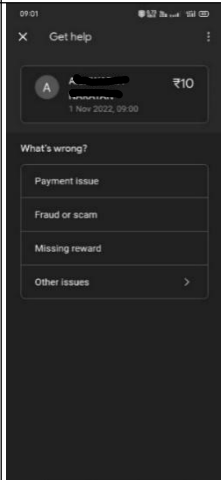
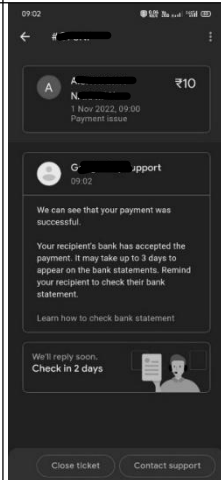
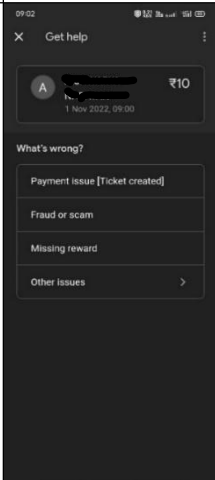



Appendix I

For each of the UPI Applications studied, we collected at least the following four screenshots:

1. The application home screen that the user sees upon launching the app.
2. The screen visible to the user upon completion of a transaction.
3. The screen(s) visible to the user as they navigate the in-app GRM.
4. The screen visible to the user as they exit the GRM.

This process was repeated after toggling to vernacular language (Hindi) as well. In some instances, we found it necessary to document other aspects of the user experience, and screenshots are reproduced below accordingly.

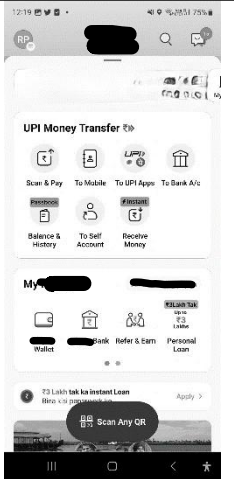
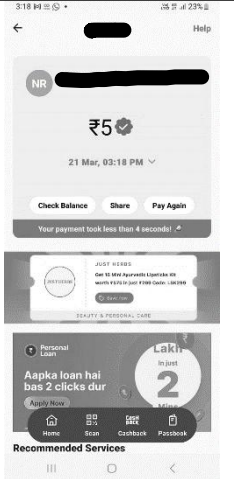
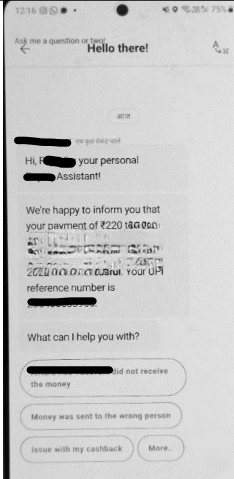
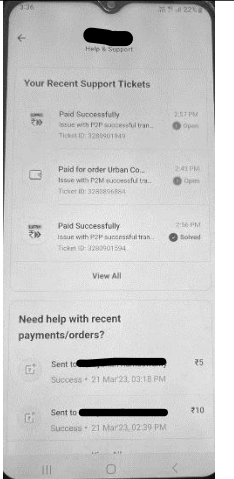
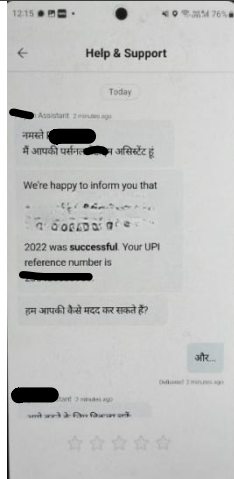
TPAP 1^{xi}

Language	Home Screen	User completes transaction	In-App GRM Experience (I)	In-App GRM Experience (II)	Post-GRM
English					
Hindi ^{xii}					

^{xi} Screenshots obtained in December 2022.

^{xii} Hindi screenshots for TPAP 1 obtained in March 2023.

TPAP 2

Language	Home Screen ^{xiii}	User completes transaction ^{xiv}	In-App GRM Experience ^{xv}	Post-GRM ^{xvi}
English				
Hindi				

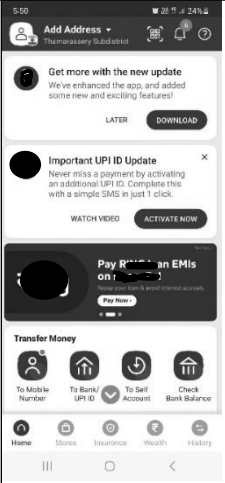
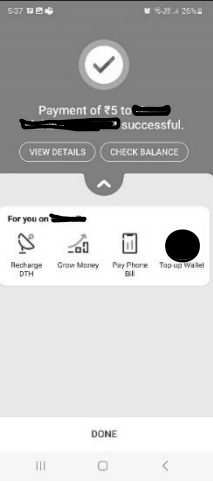
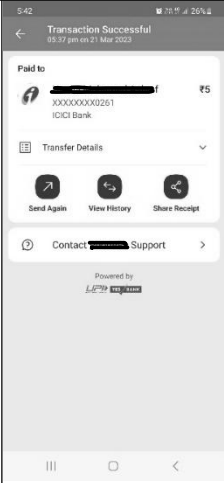
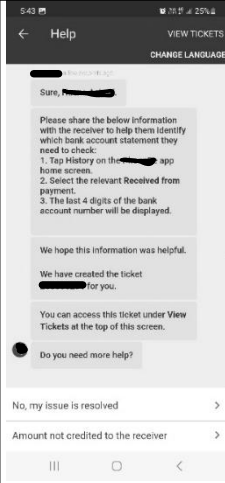
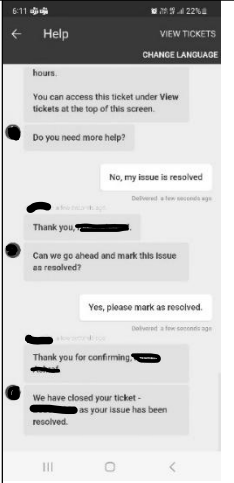
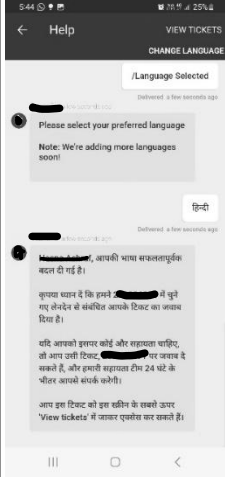
^{xiii} Screenshot obtained in December 2022.

^{xiv} Screenshot obtained in March 2023.

^{xv} Screenshot obtained in December 2022.

^{xvi} Screenshot obtained in March 2023.

TPAP 3^{xvii}

Language	Home Screen	User completes transaction (I)	User completes transaction (II)	In-App GRM Experience	Post-GRM
English					
Hindi					

^{xvii} Screenshots obtained in March 2023.

TPAP 4^{xviii}

Language	Home Screen	User completes transaction	Absence of In-App GRM Experience	FAQ Page for Self-Resolution
<p style="text-align: center;">English</p>				
<p style="text-align: center;">Hindi</p>				

^{xviii} Screenshots obtained in March 2023.

PSP 1^{xix}

Home Screen	User completes transaction	Chat-bot provides only informational support

PSP 2^{xx}

Home Screen	User completes transaction	In-App GRM Experience (I)	In-App GRM Experience (II)	Post-GRM

^{xix} Screenshots obtained in March 2023; No vernacular language support was found for PSP 1.

^{xx} Screenshots obtained in March 2023. No vernacular language support was found for PSP 2.

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