

Proto - Bringing Siloed Systems Together

Fragmented, opaque consumer complaint systems limit visibility into how markets serve - or fail to serve - vulnerable consumers. This has an outsized impact on women, who are less likely to make a complaint and more sensitive to financial harms. Proto, a Canadian-based AI company, demonstrates that modernizing consumer redress is not primarily a technology challenge, but an institutional one: success depends as much on relationships, trust, and adaptive governance as it does on digital tools.

Working with government regulators, Proto shows how technology - when paired with strong institutional collaboration - can convert fragmented redress channels into inclusive, data-driven systems that strengthen both trust and oversight. Its model, piloted in the Philippines, Namibia, and Rwanda, uses a shared-services approach to unify multiple agencies under a single consumer protection platform. AI agents automate complaint intake, routing, and tracking across channels and institutions, while generating demographic data to identify who is being left behind.

Critically, the pilots highlight that impact is driven not just by system design, but by how institutions work together: aligning incentives across agencies, adapting workflows, and embedding inclusion into everyday decision-making.

Quick facts

Barriers addressed



Institutional Norms & Practices

Lack of strategic focus on women customers
Low digital capability of financial institutions



Consumer Protection

Difficulty resolving complaints



Policy & Regulation

Lack of gender intentional NFIS

Segment focus

1 2 3 4

Geography

The Philippines, Namibia, Rwanda

Sources

Interviews with Proto conducted by GRID Impact
[2022 CGAP](#)
[2023 CFI](#)

Customer Journey Relevance



Key stakeholders involved

Proto, Central Bank of the Philippines, Cybercrime Investigation and Coordination Center (Philippines), Cambridge SupTech Lab, Department of Trade and Industry (Philippines), Ministry of Local Government (Rwanda), Namibia Financial Institutions Supervisory

Authority, National Bank of Rwanda

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Key activities

Proto partnered with financial regulators to modernize consumer complaint systems using AI-powered grievance channels. Initially piloted with the Philippines Central Bank, the initiative evolved into a shared-services model that allows multiple regulators to jointly operate and share the costs of a unified complaints platform. The project explored how shared digital infrastructure, inclusive design, and cross-agency collaboration can transform fragmented complaint channels into more accessible and responsive consumer protection systems.

- **Led design sprints with participating agencies.**
Proto's partner Cambridge SupTech Lab led design sprints with participating agencies to co-create a consumer grievance system that appears seamless to users while routing complaints to the appropriate agency in the back-end.
- **Created project charters with each participating agency.**
Proto piloted using project charters as a means of codifying collaboration with agency partners. Charters functioned as informal agreements outlining roles, expectations, and shared responsibilities.

- **Designed a shared-services licensing model with participating agencies.**
Proto developed a shared-services licensing model coordinated through a lead agency, enabling multiple institutions to access the platform and share costs rather than procuring separate systems.
- **Enabled flexible data-hosting arrangements with government partners.**
Proto adopted a flexible approach to data hosting that allows regulators to adjust or evolve their infrastructure - whether cloud-based or on-premise - while continuing to use the platform.
- **Collected local-language data to train AI complaint agents.**
Proto gathered and incorporated local-language datasets to train AI-powered chatbot agents, ensuring the system can receive and respond to complaints from consumers across diverse linguistic contexts.

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Outcomes/results

While Proto's pilot is ongoing - with active implementations across multiple countries - early results highlight how combining technology with institutional collaboration can shift how consumer protection systems function, generating improvements in data, coordination, and access.

- **Improved regulatory insight through better data:** Across pilot countries, the platform enables regulators to capture sex-, age-, and location-disaggregated complaint data, improving visibility into patterns of consumer harm and exclusion. In Namibia, this type of demographic complaint data is being collected for the first time. By moving from fragmented, time-consuming complaint handling to integrated, system-level monitoring, regulators are better able to identify gaps and respond more quickly, strengthening oversight and improving the responsiveness of consumer protection systems.
- **Increased government engagement and cross-agency coordination:** Design sprints and shared-service governance brought multiple regulators together to jointly

redesign complaint workflows, replacing fragmented processes with coordinated systems and improving institutional collaboration.

- **Greater operational efficiency in complaint management:** Automated routing and integrated notifications reduced manual handoffs and misrouted complaints, allowing agencies to process cases more quickly and coordinate responses across institutions.
- **Expanded consumer access through multi-channel systems:** The platform enables complaints to be submitted through multiple channels, including webchat, social media, USSD, and messaging platforms, broadening access for consumers who face barriers to traditional channels. This is particularly relevant for women, who are less likely to own smartphones, have reliable internet access, or engage with formal complaint systems. While disaggregated usage data is still emerging, the design directly targets known access constraints.

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Key enabling environment factors for the intervention

Government partners willing to co-create - not just procure

In all three countries, central banks or coordinating agencies did more than approve a new system - they engaged as active partners in shaping it. This required a willingness to share data across institutions, align workflows, and build trust in a shared model rather than maintain siloed systems. Proto invested heavily in relationship-building, but progress depended on government counterparts being open to new ways of working. This included accepting a shared-services approach, where multiple agencies coordinated under a lead institution and contributed to the cost - an uncommon but critical shift that enabled cross-agency participation.

Existing digital foundations and commitment to system modernization

Proto's model depended on partners that could support - or were actively pursuing - digital transformation. In the Philippines, existing digital infrastructure enabled rapid testing and expansion across agencies. In Rwanda and Namibia, while systems were less developed, there was strong institutional interest in building modern, interoperable back-end systems.

This willingness to invest in and iterate on digital infrastructure made it possible to introduce AI-enabled tools for complaint intake, routing, and analysis.

Key design elements and principles that led to successful outcomes

Proto's pilots were not defined by speed, but by an iterative, diagnostic-led approach to system design. Several elements were critical:

- **Start with system mapping, not solution-building:** Proto began with structured diagnostics - including surveys of participating agencies - to understand how complaints were currently received, routed, and resolved. This grounded the design in actual workflows rather than assumptions.
- **Design for interoperability across agencies:** Rather than optimizing for a single institution, the system was built to function across agencies with different mandates, processes, and data structures.

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- **Adapt to political and institutional realities:** Implementation was iterative by necessity. Shifting government priorities, leadership changes, and evolving participation required flexibility in both design and delivery.
- **Prioritize usability for both regulators and consumers:** The system needed to reduce administrative burden for government staff while remaining accessible and trustworthy for users - especially those typically excluded from formal complaint systems.

Potential for scale/replicability

Early experience from Proto's pilots suggests that scaling digital grievance systems requires more than new technology - it depends on cross-agency collaboration, standardized data, and sustained institutional capacity. Governments can begin modernizing complaint systems within existing mandates by reducing fragmentation, improving routing, and capturing demographic data that reveals patterns of consumer harm.

Expanding reach will also require partnerships beyond national regulators, including local governments and providers, alongside continued investment to strengthen both digital infrastructure and the public-sector capacity needed to use it effectively.

Challenges encountered during the program

- **Shifting government priorities and political turnover:** Changes in political leadership meant shifting institutional mandates and willingness to cooperate. When one agency stopped cooperating, Proto had to reintroduce the initiative to another agency and rebuild support from scratch.
- **Institutional and bureaucratic constraints:** Existing approval processes, legacy systems, and fragmented workflows limited speed and required the solution to adapt to - not replace - existing structures.
- **Infrastructure and technical variability:** Differences in digital maturity across countries shaped what was feasible, particularly in contexts with paper-based systems or limited data standardization.

Exemplars

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Recommendations from the research

For funders: Investing in effective consumer protection *is* investing in capacity building.

Sustaining progress on consumer redress will require funding both the digital tools that enable governments to modernize, and investing in the public sector capacity to use them effectively. Many agencies already collect consumer data, but lack the skills, systems, and behaviors to translate that data into action. This isn't a gap in imagination – it's a gap in investment.

For regulators: Meaningful reform can begin inside existing constraints.

Political will and budget allocations remain essential for change to occur – but they often arrive slowly. Proto's pilots show that regulators can still make meaningful gains by strengthening how existing workflows function: reducing fragmentation, improving routing, and increasing visibility without changing legal mandates or approval chains. By working within existing governance structures, regulators can streamline complaint handling, reduce delays from misrouting and manual handoffs, and embed lightweight consumer feedback and narrative review that turns everyday case management into a learning system – one that improves redress quality while building the case for deeper reform over time.

For providers: It's time to future-proof financial and digital services.

Regulatory expectations are shifting. With AI-enabled complaint systems generating deeper, demographic insights, providers will be expected to demonstrate how their services perform for vulnerable populations – not just that they meet minimum standards.

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