



Mitigating risks of abuse of power in cash assistance



TOOL: User Journey exercise to identify risks at each step of the cash assistance

KEY ACTION

✓ Adopt the perspective of cash recipients to identify risks of abuse of power. This will also help you define customer service expectations for financial service providers and agents, as well as supporting measures to be put in place by your organisation. When doing so, ensure you consider gender differences and the different user journeys for older people, people living with disabilities and those with additional vulnerabilities.

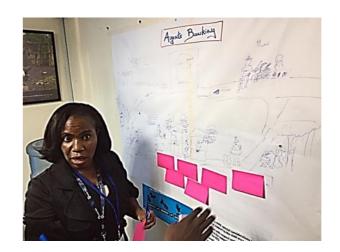
What is in this tool?	This tool helps illustrate the cash assistance process from the perspective of the cash recipient while also emphasising the important intersections between user expectations and assistance/service requirements. Understanding these perspectives allows stakeholders to adapt operations accordingly, including key messages around cash assistance.
How?	You and your multifunctional team can carry out this exercise, preferably in partnership with the financial service providers that you are working with. Alternatively, you could organise a workshop with all partners- financial service providers, cooperating partners, national partners (including key government counterparts), and other humanitarian agencies using cash assistance.
When?	During strategic planning.

Methodology to organise a User Journey exercise:

- Each participant puts himself/herself in the shoes of a cash recipient of the programme you are implementing, with the specific contextual vulnerabilities and corresponding (low) level of financial and digital education.
- The group is split up into smaller groups and organised per cash delivery mechanism -currently in use or planned- in your country operations. These can include: mobile money, cash in envelope, over-the-counter cash collection, mobile banking vans, agency banking, e-vouchers to be redeemed at selected traders etc.

1. Each group draws the user journey for their cash delivery mechanism

- The group draws each step of the cash assistance process focussing on the points of contact with financial service providers e.g. training on using the cash delivery mechanism, SIM card distribution (in the case of mobile money), card distribution (in the case of prepaid/smart cards), withdrawal, payments at merchants (in the case of e-voucher), etc.
- Insist that participants use DRAWINGS as per the
 picture and not flow charts or bullet points.
 DRAWING brings us out of our comfort zone. It
 helps participants to put themselves in the shoes of
 a cash recipient going step by step through the
 cash assistance process, and back to their home.



2. Identify risks and aggravating factors

- On PINK post-it notes, ask participants to write down all possible risks of abuse of power and stick them on your user-journey map (1 risk per post-it).
- On BLUE post-it notes, they note down aggravating factors enhancing the risks of power abuse (e.g. language, lack of education, gender, etc.).

DIRECT CASH PAYMENT (CASH IN HAND) THROUGH AN AGENT Voucher/ticket/ Exit distribution Check-in Cash withdrawal check distribution site · Security agent asks Lack of respect, rude Manipulation of Extortion for favours or fees behaviors exchange rate from security to allow people agents outside Agent requests fees Provision of old notes accessing the site distribution site or favours to allow with lower value or Theft on the way beneficiary access counterfeit money the distribution back home with Theft of bank notes complicity of Amount on the check from illiterate clients or people involved in women busy with their is reduced compared the distribution to what is due Favours requested Collusion between by agents spending agents and the night on site humanitarian staff to keep entitlements of no-show beneficiaries Aggravating factors: trauma from men in uniform, absence of humanitarian actors during the distribution, language, illiteracy and lack of numerical literacy, gender, lack of mobile coverage to denounce abuses

MOBILE MONEY Distribution of the E-Money sent Cash withdrawal phone and SIM card on the phone • Request of undue • Manipulation of • Presence of false agents fees or favours for the the excel file Slicing for real or fake lack of liquidity, enabling phone/ SIM card Lack of data agent to cash in more in commissions • Swap of SIMs and protection when • Lack of respect, rude behavior, humiliation sending file copy of ID Discrimination / serving other clients first Provision of • Theft of identity/ • Provision of old notes with lower value or erroneous swap SIM to cash counterfeit money information on Theft of notes fee structures for • Manipulation of exchange rate transactions • Request for undue fees or favor • Lack of respect, rude Agent gets the PIN code and remove e-money from behavior, humiliation client account • Lack of discretion when analyzing refugee IDs Aggravating factors: feeling of inferiority towards agents, poor training on the phone use, lack of network to register clients or lack of electricity to charge the phone, hotline that is not toll free, delays between

Examples from the Democratic Republic of the Congo: each arrow is a step of the user journey, and participants have listed bullet points with the different risks as well as aggravating factors before working on mitigating measures.

distribution of phones and cash transfer, different language, analphabetism and lack of numerical literacy

affecting PIN memorization, gender, poor liquidity management

3. Identify risk mitigating measures

- On YELLOW post-it notes, write down existing mitigating measures that are already applied.
 Specify which stakeholder is putting this measure in place: e.g. financial service provider, national regulator, community, etc.
- On ORANGE post-it notes, write down your suggestions for additional risk mitigation measures that are currently not applied but would decrease the risks of abuse of power if they were applied.



4. Prioritise remedial actions

- Back in plenary, ask each group to debrief on the 10 most salient risks of abuse of power they have faced during the user journey exercise, the key mitigating measures that are already in place and what else could be done.
- Then, ask each participant to individually write 5 different mitigating on 5 different post-it notes with the
 measures they consider most important to minimise the risk of abuse of power in cash transfer programmes,
 and stick them next to the stakeholder they think should be responsible for applying them (e.g. financial
 service provider, national regulator, community, etc.)
- Participants can then stick the post-its onto a large flipchart on the wall. <u>Prepare the flipchart before the session</u> by joining 4 flipchart papers together, and drawing a table listing each type of stakeholder. See the example below: <u>Prioritisation of mitigating measures suggested by participants in a workshop in Juba, South Sudan.</u>

Prioritisation of mitigating measures suggested by participants in a workshop in Juba, South Sudan

Support the extension of the mobile network throughout the country Telecom regulation Reinforce the legislation on mobile service providers and their roles vis-à-vis banks Liberalise the telecommunication services Facilitate KYC based on UNHCR-issued documents to enable refugees to open bank accounts Central Bank Set up a tiered system of KYC requirements to ensure people without ID can still access financial services even with limitations in terms of amounts /facilitate access to bank accounts /clarify requirements for opening accounts (*3) Develop customer protection legislation including articles on protection from sexual exploitation, GBV, code of conduct /regulate the conduct of financial service providers and their agents Implement effective monetary and fiscal policy to manage inflation /stabilise the local currency and markets /prevent inflation /curb inflation with effective policies Encourage the spreading of financial services to underserved areas via agency banking and mobile money Support financial education for the masses support educational loans Reduce and stabilise the exchange rate USD versus SSP Assist the development of mobile money systems Increase the network of mobile money operators beyond Juba (*2) and work with Telcos to Mobile Money ensure stability of the network Operators Create awareness on mobile money services and advantages (*2) Develop training manuals in local dialects Use age- and gender-appropriate local languages in all communications to ensure inclusion of the most vulnerable Identify and respond to the communication needs of persons with disabilities Develop voice operated / audio messages to help illiterate people navigate the menu Develop easy systems and processes Ensure accessibility of services for beneficiaries Ensure distribution sites are safe and accessible to all affected populations, including for persons with disabilities and the elderly /distribution points should be close to populations and should have crowd control measures Train mobile money operators on customer service, and on professional disbursement of cash transfers, with respect and without bias, and on prevention of sexual exploitation and abuse (*3) Set incentives and ensure agents adhere to codes of conduct Ensure friendly customer care Facilitate access to cheap phones Develop user-friendly products facilitating cash transfers Ensure liquidity management Display process of withdrawal in visible area Use audio clips to educate recipients who cannot read Support delocalisation of banks outside the capital city /establish new branches in remote **Banks** areas /facilitate accessibility /move closer to communities /open more branches (*2) Reduce fees for users to encourage use of bank services Invest into biometrics registration and mobile banking Innovate on bank products to encourage use of banks by beneficiaries including micro savings, micro loans and micro insurance

Train and position special staff for humanitarian cash assistance (x3) /train continuously with a focus on the code of conduct and ethics /protect end users from abuses /have safeguarding

policies adhered to by all staff

- Train staff on protection from sexual exploitation and abuse and business ethics
- Develop service-level agreements with agents on the ground and enforce them
- Review complaints handling procedures
- Ensure safe environments for disbursing cash to beneficiaries
- Provide good quality notes
- Verify currency on counting machines to avoid fake notes
- Establish incentives for agents' good behaviours
- Invest in information education and communication materials based on graphical design /provide guidance and materials for using mobile money easily
- Partner with mobile money agents to increase coverage
- Simplify opening of account for both cash assistance beneficiaries and the local population while observing KYC
- Train beneficiaries on how to open and operate bank accounts
- Reinforce data protection policy for beneficiaries
- Inform beneficiaries on their rights and entitlements through awareness

Money transfer companies

- Provide clean and quality notes
- Train staff on protocol for cash transfer, code of conduct and on how to engage beneficiaries with dignity (*2)
- Put in place complaints and feedback mechanisms
- Conduct protection risk assessment in the location of the disbursement including conflict sensitivity related to the local population
- Use age- and gender-appropriate local languages in all communications to ensure inclusion of the most vulnerable
- Identify and respond to the communication needs of persons with disabilities
- Use alternative identification mechanisms for beneficiaries without ID

Humanitarian Agencies

- Conduct training for financial service providers on humanitarian principles
- Collaborate with financial service providers in a partnership approach and clarify the roles and responsibilities of all actors
- Reinforce links between feedback mechanisms and private sector client service systems
- Sensitise beneficiaries and financial service provider agents on dos and don'ts
- Use age- and gender-appropriate local languages in all communications (including
 information provision, feedback mechanisms, consultations) to ensure inclusion of the most
 vulnerable throughout every stage of the programme cycle
- Ensure participation of the affected population in cash programme cycle
- Demonstrate feedback mechanisms are effective and result in demonstrable programmatic adjustments, including holding financial service providers to account
- Identify and respond to the communication needs of persons with disabilities
- Ensure age-, gender-, and disability-sensitive registration and distribution points are safe and easy to access, taking into consideration the unique needs of the most vulnerable
- Facilitate IDs for beneficiaries (*2)
- Consider more systematic use of biometrics in cash assistance
- Capitalise on local leaders' roles to mediate issues during distributions
- Provide protection services during registration of cash beneficiaries
- Provide fit for purpose feedback and complaints mechanisms to ensure any concerns are reported (*3) and communicate changes derived from CFM input to the community and financial service providers
- Train and raise awareness of beneficiaries on the cash process, the modality, their interactions and rights vis a vis financial service providers (*3)
- Support the relationship between private sector staff, humanitarian staff and communities
- Banks and humanitarian agencies should meet regularly to discuss processes which are user friendly
- Train beneficiaries on financial and digital literacy
- Select modalities and products facilitating financial inclusion

- Raise awareness about risks of abuse of power in cash assistance, maybe in a forum involving at the same time the agents and the beneficiaries to allow exchange and Q&A
 Have a conflict sensitive approach to cash-based interventions and carry out protection assessments regularly
 - Increase staff capacity to deliver cash and voucher assistance, not reserved to "cash specialists"
- Hold financial service providers accountable in case of abuse of power and ensure the they
 and their third-party agents have proper safeguarding policies in place /reflect their
 responsibilities in tenders and contracts
- Ensure cash assistance can be used quickly to respond to emergencies
- Do surprise monitoring and feedback visits to distribution sites
- Put in place measures related to accountability to affected populations throughout the cash process (*2)
- Encourage joint approaches between agencies to ensure beneficiaries do not need several modalities to access different cash assistance
- Embrace coordination in cash assistance
- Negotiate favourable rates for the most vulnerable

Donors

- Support the development of mobile networks
- Support the development of the legislation to ease financial transfers
- Include pre-emptive actions related to mitigating risks of abuse of power in the screening of funding proposals
- Listen to beneficiaries' feedback and adapt funding strategy accordingly
- Favour the delivery of assistance through cash instead of in-kind when conditions permit
- Ask feedback from financial service providers on the cash assistance process
- Avail more cash to make the support more meaningful

Community

- Be involved to explain risks to humanitarian agencies during protection assessments
- Community leaders could support adoption of new cash disbursement modalities by beneficiaries /public awareness events after having attended a training
- Provide feedback on communication materials and awareness training to adapt them to the context
- Organise support systems for the most vulnerable to access the distribution point and be protected when they return home with the cash
- Ensure gender balance in community focal points on site
- Report any issue related to abuse of power including bribery