



TOOLKIT: RESPONSIBLE CASH

# I am looking to ... **Engage with the private sector**

by UNHCR and WFP



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TOOLKIT: RESPONSIBLE CASH

## Engaging with the private sector

# Maximising opportunities in private sector collaboration

### What is this document about?

This document offers practical guidance and tools for successful engagement and partnerships with the private sector - focusing on financial service providers and merchants.

The focus is on promoting inclusion, improving transparency, and leveraging private sector innovation and scale to deliver safe, efficient, and user-centred financial services.

## What can we do to partner more effectively with financial service providers?

- Financial service providers, such as banks, mobile money providers and fintechs, have become key partners for humanitarian organizations in delivering cash assistance. Even though some projects are already almost fully delivered by them, **we seldomly leverage the full potential of these partnerships.**
- Projects are more likely to succeed when all parties involved are committed and working in partnership. financial service providers **can creatively meet programme-specific requirements when equipped with sufficient resources and a proper understanding of user needs** (see p.66 for examples).
- HOW?** Below are some tips of how to leverage the full potential of the private sector partnership **without compromising on minimum standards** (humanitarian principles, customer protection).

## Key success factors identified

- ✓ **Build relationships and engage providers early.** This speeds up project implementation and the private sector may also add **innovation in project design.**
- ✓ **Clearly communicate requirements,** establish clear lines of communication and align roles and responsibilities. E.g. use the simplified [Code of Conduct](#) and [Customer Protection Checklist](#) to help the provider understand humanitarian rules and requirements for their services and reward good practice!
- ✓ Contracting with humanitarian partners may be more difficult than the providers are used to. **Don't overwhelm partners** with lengthy and resource-intensive contracting processes and documentation.
- ✓ **Cut out jargon/adapt language** and help partners understand the '**business case**' for working with unbanked and underserved communities. Keep in mind that in some contexts, humanitarian cash transfer programmes are rarely seen as commercially viable for financial service providers.
- ✓ Have ready-to-use [materials/supports](#) that the partner can easily understand and implement. This includes [training materials such as on Customer Protection](#) but also on other areas such as on making assistance more accessible for persons with disabilities, specific communications around prioritizing women etc.

Meanwhile, **keep operational challenges that are influenced by the local context in mind!** E.g. security situation, access challenges, fuel shortages or challenges posed by national regulatory requirements etc.



## What are key areas where we can collaborate with private sector partners?

- Work together **to design products that fit people's needs** e.g. have a look at this [Playbook by D91 for designing financial products for women](#) and the [Better Than Cash Alliance section for companies](#)
- Digital financial inclusion:** In [Somalia](#), mobile money operators saw the opportunity: they developed visual materials and **translated the digital and financial literacy communications materials** into other languages. Private sector partners ran **digital & financial literacy trainings** (incl. on fraud/scams strengthening **customer protection**).
- Mobility and connectivity:** Private sector partners provided **free or subsidized SIM cards or mobile phones** (also pay-as-you-go options) or worked together with humanitarian partners to identify areas where they would **build infrastructure** whether there is no connectivity (such as mobile signal towers, solar-powered ATMs, mobile charging stations etc).
- Joint advocacy with regulators** for people to get [access to IDs or tiered/simplified KYC with regulators](#) where people lack ID.



## Why and how to invest in the lower-income, unbanked and hard-to-reach?

Financial service providers may **capture large customer segments of lower-income, unbanked, hard-to-reach customers**, including women, through **offering tailored products and services that are responding to their needs**. For the financial institution this means unlocking significant growth potential:

- Especially **women are known to be excellent customers** - loyal and good borrowers with low default rates. "[We know that when women save and borrow, financial institutions liquidity goes up, and risks go down](#)". Actively address access barriers (e.g. access to functional ID, mobility challenges, social norms).
- Digital financial services, mobile money, and agent banking present **cost-effective means of reaching these underserved segments**, by reducing operational costs and improving service accessibility.
- Early movers in financial inclusion can **differentiate themselves from competitors and establish strong market positioning**. For example, [Jazz Cash in Pakistan](#) recognized the value of providing digital training to customers in rural areas (especially to women), unlocking a significant growth.
- Companies that **provide relevant products** and [excellent customer service/protection](#) that **treats people with respect** can **benefit significantly through word-of-mouth** - communities trust the providers their neighbours had good experiences with. Refer also to the [CERISE-SPTF Management Standards](#).
- **Understanding customers and their needs** is key (e.g. through consultations and disaggregated data).
- Financial institutions should design **innovative solutions** (i.e. subsidized/pay-as-you go mobile phones, provide mobile banking units etc) to make their services more accessible to disadvantaged communities.

### Where to start? Offer relevant savings solutions!

**Savings products** are the most attractive entry point (for both providers and customers), because...

- ✓ For financial service providers funds held through savings accounts are **an unexpensive source of local currency**, facilitating lending and other financial services, revenue generation and offsetting liquidity gaps
- ✓ Savings accounts provide people with a safe place to save (e.g. women are inherent savers). This builds the opportunity and base to build a financial profile required for other financial services i.e. **opportunities for cross-selling**, such as overdraft, micro-insurance, and payment services, as people get more familiar with financial services through savings.

## Encourage service providers to use user-centred product and service design

For example, you may use these here from [D91](#) below, resources from the [Better Than Cash Alliance](#) (p.51) and [Women's World Banking resources](#)



### 1. Accessibility

Provide easy-to-understand information, clear visuals, and timely feedback. Include language options, accessible support and educational resources for a diverse user base.

#### Accessibility indicators

- Clear & visible communication
- Predictable
- Inclusive & accommodative
- Versatile & adaptable

#### An inaccessible interface

is non-inclusive and not user-friendly. It may cause frustration leading to user drop-off.



### 2. Trust

Build user trust through transparent, clearly stated privacy policies. Provide feedback and responsive grievance redressal mechanisms. Incorporate social proof to reinforce credibility.

#### Indicators of Trust

- Build positive relationships\*
- Exhibit expertise\*
- Consistency\*
- Transparency
- Security

**Lack of trust** in a platform can lead to poor engagement with the segment, insecurity and drop-off



### 3. Intuitive

Create an intuitive interface that is scalable and flexible with the user's growing needs. Keep the design simple, user-friendly, and aligned with the user's expectations.

#### Elements of Intuition

- Familiarity to the user
- Clarity of information & actions
- Offer flexibility
- Minimal cognitive effort

**Unintuitive interfaces** might make the users internalise, get confused or get frustrated



### 4. Engagement

Enhance user engagement through clear and compelling calls-to-action, gamification, and personalized rewards. Make the users feel heard by asking for suggestions & feedback.

#### Indicators of Engagement:

- Personalization
- Feedback
- Micro-animations
- Gamification
- Rewards
- Social sharing & referrals

**Lack of engagement** leads to unsatisfactory experience and user drop-off.

## Need some inspiration? Here are a few examples

### EXAMPLE 1: Refugees mean business. Why investing in them pays off for financial services providers

- Rwanda has hosted refugees for over 20 years, creating a need for long-term financial solutions. A [study by FSDA, UNHCR, and AFR](#) assessed both the demand for financial services among refugees and the business case for Rwandan financial institutions to serve them.
- Key findings revealed that 90% of refugee households earn above the median income of Rwandan bank account holders. Expanding financial services to refugees **increased the financial services market** by 44,000 individuals, with strong demand for savings, loans, and insurance products, **as many refugees used financial services before and want to use them again**, perhaps more than Rwandan nationals.
- Similarly, another World Bank/UNHCR study found that the Kakuma Refugee Camp **boosted the Turkana region's economy, increasing gross regional product by 3.4% and employment by 2.9%**, while also raising consumption, incomes, and asset ownership among the host community.
- **Key takeaway:** Investing in financial services for refugees is both a social and economic opportunity, enabling providers to expand their customer base while fostering financial inclusion.

### EXAMPLE 2: Using data driven insights to better serve women customers - KCB Bank, Kenya

- KCB Bank, Kenya's largest commercial bank, initially launched a women-focused product that failed to gain traction, reinforcing biases that women were not solid borrowers.
- In 2017, the **bank analysed sex-disaggregated data** and discovered that while women owned 40% of businesses and made up 50% of their MSME customers, only 9% were borrowing.
- By **reengineering its approach** and improving customer engagement, adjusting credit methodologies, and offering non-financial support more **tailored to women's needs and preferences**, KCB saw a significant increase in women borrowing: 26% of women MSMEs now borrow, and customer satisfaction reached an impressive 42%.
- **Key takeaway:** Data-driven insights help financial providers better understand and serve unbanked women, unlocking a major market opportunity.

### EXAMPLE 3: Women are creditworthy - Rethinking credit scoring

- Research consistently shows that women receive fewer loans, smaller amounts, and higher interest rates despite strong repayment behaviours.
- To challenge this bias, researchers from Northwestern University and UC Berkeley partnered with a Dominican bank to test gender-specific credit-scoring models.
- The results were striking—when **alternative credit assessment methods** were applied, 80% of women had higher credit scores, proving that conventional models underestimate women's creditworthiness.
- **Key takeaway:** Gender-sensitive credit scoring enables financial institutions to tap into a profitable, yet underserved market while promoting financial inclusion.

### EXAMPLE 4: Tailoring insurance to women - AXA's \$1.7 trillion market opportunity

- In 2016, global insurer AXA partnered with IFC and Accenture to assess the women's insurance market - valued at \$1.7 trillion. Through **data analysis and focus groups** across multiple countries, AXA **identified women's unique insurance needs**, including health coverage, pregnancy, business protection, and financial upskilling.
- The result? 26 new tailored products across 17 business units, offering both retail solutions (e.g., life, health, and property insurance) and SME business support (e.g., liability coverage/access to finance).
- **Key takeaway:** Financial providers who invest in understanding women's needs can unlock new revenue streams and increase customer loyalty.

## Why is it important?

- **Merchant mobile payments are still not widely used** despite the advantages that e-money payments bring - being safe from theft or fire; being in general cheap and efficient; transparent and easier bookkeeping; merchants can use e-money to pay staff & suppliers, can be used in countries where there is a lack of liquidity etc.
- However, **many merchants do not prefer e-payments for various reasons**, so users still need to carry cash. Both the demand side (cash transfer recipients and other clients) and supply side (merchants) need to be ready, which is often not the case.

## What can you do to increase merchant acceptance of e-payments?

- **Sending money to peoples own accounts is often preferred to cash-over-the-counter** because of increased assurance/transparency and the indirect positive outcomes for people (ability to save in a safe/secure place, increased digital and financial literacy, financial empowerment, etc).
- **Advocate with regulators to provide incentives for merchants and customers** taking up e-payments. Governments have a key interest in digitization.
- **Understand the merchants**, their payment flows - how do they operate? Are they registered businesses? Try understand the challenges and barriers that they face and identify solutions.

Here are key reasons stated by merchants that pose barriers and solutions/arguments to e-payments adoption (adapted from [CGAP](#)):



Identified issue/perceived disadvantage	Key counter arguments/messages
Their existing business processes are based on cash and paper	Using digital payments facilitates bookkeeping, adds transparency and the ability to check transactions/balances any time.
Making business payments (or receiving payments) via e-payments may incur a fee - cash doesn't	<a href="#">Advocate with regulators</a> to reduce merchant fees, waiving merchant fees for small merchants or reimbursing merchant fees as incentives.
To get cash, digital merchants have to go find an agent (maybe close shop) and pay a fee - E.g. some whole-sellers require merchants to pay their merchandise in cash	Negotiate with wholesalers, importers to accept digital payments (review the entire supply chain). Try understand the type of actors and problem/benefits for each level.
Used only be a few customers - it's not worth to invest in infrastructure/hardware if cash is used by most customers	Many solutions for merchants are available on mobile phones. Humanitarian organizations can also work with regulators to subsidize POS machines. Work with financial services providers to provide incentives to users - prizes for new customers performing X transactions – to incentivise uptake. <i>NB: Cash Transfer projects bring scale!</i>
Not anonymous - due to digital footprint, merchants are worried that digitizing means also 'formalization' and therefore paying (more) taxes	Engage with regulators on information campaigns to clarify that digitization has benefits, e.g. through offering bonuses for processing a certain number of transactions per month. NB: Digitization is not necessarily lead to negative impacts from formalization/taxes.
Subject to network, device, power, transaction failures - Cash is seen as more reliable and faster to use	Advocate with financial services providers/regulators to ensure network reliability & adequate training. Reiterate positive outcomes.
E-payments are too complex to use, for both customers and merchants – cash is more intuitive	Provide <a href="#">digital and financial literacy training</a> as part of your projects and advocate with financial services providers/regulators on joint campaigns. Reiterate positive outcomes.



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## Mitigating the risks of abuse of power

### What is this document about?

This document provides guidance and tools to create training materials that prevent abuse of power by private sector actors.

It focuses on addressing misconduct, promoting positive behaviour, and ensuring fair and informed interactions with cash recipients.



## Why is it important?

- Cash transfers are increasingly used by humanitarian actors to meet the basic needs of the most disadvantaged. While **regular customers can usually choose among several financial service providers**, people assisted by humanitarian agencies **don't often have this freedom of choice** and cannot use this as leverage to demand improved service provision.
- This **power imbalance can result in abuse and exploitation**. Many payment recipients are new to financial services, may lack digital/financial/general literacy skills, making them susceptible to exploitation during transactions.

## What does abuse of power mean in practice?

- Abuse of power occurs when an individual **exploits his position** of authority, hierarchy, or advantageous standing **to coerce, harm, or deprive others of their rights or entitlements**. Such misuse of power can manifest in **various forms of abuse**, including psychological, physical, financial, and sexual abuse.

Examples of reported risks identified during field missions include:

*"I am sometimes worried that my money will get stolen on my way home. I have heard that sometimes the bank agents collude with the thieves."*

*"I'm worried that agents charge me extra fees or asking us for favours to compensate for low commissions, transportation costs, liquidity issues, or security risks."*

*"I am not familiar with these digital tools... I really don't feel comfortable using them!"*

*"Some agents give us poor quality banknotes or lack small change, so we don't get the full value of the transfer."*

*"I am not sure where to go if I need help, want to report fraud. I am also worried what will happen to me or my family if I express my grievances."*

*"Some agents do not treat our personal information confidentially."*

*"I've seen instances where private sector agents encourage people to use their date of birth as a PIN. Sometimes they even ask directly for the PIN code. I do not want to tell this information, as they could carry out fraudulent transactions with it!"*

*"I've noticed some agents showing disrespect towards us with rude attitudes, impatience. Sometimes they also let other people skip the queue."*

*"I was not able to cash out the total value of my assistance payment because the agent did not bring enough bills. When there are liquidity issues, the agents sometimes ask us for a fee or gift."*

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## Customer protection is essential, especially for most disadvantaged clients

### Key messages: Why is Customer Protection important for private sector businesses?

- Customer protection means ensuring clients are **treated fairly and transparently**, their data is kept **private**, and they have access to **redress mechanisms**, so people can **confidently and safely use financial services**. Strong **customer protection measures** are key to maintaining trust and ensuring financial services are accessible and beneficial to all clients, including those in vulnerable situations.
- Effectively addressing risks such as fraud, misuse of funds and data privacy concerns strengthens **compliance with legal regulations** and long-term business outcomes. **Protection from Sexual Exploitation and Abuse (SEA)** is a critical component of responsible cash. Proactive measures to identify, report, and respond to SEA risks are essential to protect customers and maintain trust.
- Strong customer confidence and trust reinforces a **positive brand image**, attracting/retaining customers. Loyal customers are more likely to explore additional **product and services** (increased 'cross-/on-selling').

### How to get started?

- ☐ **Assess organization's current capacity** - To support these efforts, we've put together a **Customer Protection Checklist**. Providers should always build on what is already in place (e.g. fraud management mechanisms). You may also want to review the CERISE-SPTF **Client-protection standards**.
- ☐ **Develop or strengthen the organization's Code of Conduct (CoC)**: Involve leadership, compliance teams, and frontline staff in drafting/adapting it to ensure buy-in.
  - See this **example Code of Conduct** setting out minimum standards.
  - Ensure staff sign the CoC as part of their contract; link adherence to performance review and introduce rewards for ethical behaviours/excellent customer service.
  - Tip: Use **simplified** and **audiovisual versions**: Translate key principles into local languages and use posters, infographics, and digital reminders.

- ☐ Conduct **mandatory customer protection training sessions** for all staff/sub-contractors, using real-life cases studies focusing on respectful service. Here are other **tools and resources** to help the provider get started.
- ☐ Establish **accessible and strong complaint and redress mechanisms, including clear referrals and reporting procedures** to report violations.
- ☐ **Monitor staff and contractor performance** (e.g. through unannounced spot checks & 'mystery shopping').
- ☐ **Sanctions & Rewards**: Set clear sanctions for violations, recognize agents who consistently uphold high standards.



You can use this **video** to promote agent appropriate behaviour in English, French, Arabic, Spanish and Kirundi.

For more check this overview: **[What can we do to work more effectively with Financial Service Providers.](#)**

You may also consider **external certification**, e.g. **[GSMA Mobile Money certification](#)**.

### 8 Principles of Code of Conduct

- TREAT ALL CLIENTS WITH DIGNITY AND RESPECT**
- ENSURE FAIRNESS TOWARDS ALL CLIENTS**
- PREVENT AND COMBAT ALL EXPLOITATION AND ABUSE**
- RESPECT LAWS AND POLICIES**
- PRESERVE CONFIDENTIALITY AND PRIVACY**
- REJECT BRIBERY AND CORRUPTION**
- ENSURE INTEGRITY AND RESPONSIBILITY**
- REPORT CONCERNS AND COMPLAINTS**

Download the Code of Conduct Templates **[HERE](#)**

## Who are non-contracted partners and why is customer protection important?

Even when non-contracted partners are **not directly bound by formal agreements**, their actions and services still impact the people we assist through cash transfers. Ensuring they adhere to **customer protection principles** is crucial for humanitarian actors who are accountable to the people assisted.

Here is a few examples of non-contracted partners:

- **Mobile money agents** - agents operating outside formal contracts. NB: You may have a contract with an aggregator, which in turn will use the services of various FSPs including mobile money agents.
- **Merchants** - Shops and businesses processing digital transactions via mobile wallets or bank-linked payments.
- **Fintech providers** - Fintech platforms providing transaction infrastructure without contracts with humanitarian organisations.



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## Key messages: Why is Customer Protection important for their businesses?

- Strong **customer protection measures** are key to maintaining trust and ensuring financial services are safe, accessible and beneficial to all clients, including those in vulnerable situations.
- Effectively addressing risks such as fraud, misuse of funds and data privacy concerns strengthens **compliance with legal regulations** and long-term business outcomes. **Protection from Sexual Exploitation and Abuse (SEA)** is a critical component of responsible cash. Proactive measures to identify, report, and respond to SEA risks are essential to protect customers and maintain trust.
- Strong customer confidence and trust reinforces a **positive brand image**, attracting/retaining customers. Loyal customers are more likely to explore additional **product and services** (increased 'cross-/on-selling').

## How can we help strengthen Customer Protection of non-contracted partners?

### 8 Principles of Code of Conduct

- 1 **TREAT ALL CLIENTS WITH DIGNITY AND RESPECT**
- 2 **ENSURE FAIRNESS TOWARDS ALL CLIENTS**
- 3 **PREVENT AND COMBAT ALL EXPLOITATION AND ABUSE**
- 4 **RESPECT LAWS AND POLICIES**
- 5 **PRESERVE CONFIDENTIALITY AND PRIVACY**
- 6 **REJECT BRIBERY AND CORRUPTION**
- 7 **ENSURE INTEGRITY AND RESPONSIBILITY**
- 8 **REPORT CONCERNS AND COMPLAINTS**

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As we do not have any contracts with these providers, **we should not overwhelm them with requirements** (NB: there is no legal basis/requirement for them to fulfil them, other than national regulation). Consider sharing a few **simple supports and engage them early** to help them get started:

- ❑ Consider developing a **Memorandum of Understanding** with selected providers to formalize their work. This document could specify the estimated amount of customers for the provider/per area etc. but also **minimum standards expected in terms of service provision**, such as through:
  - Sharing [simplified](#) and [audiovisual Code of Conduct](#): Translate key principles into local languages and use posters, infographics, and digital reminders.
  - You may also offer support or **collaboration in training staff** on [customer protection](#) or help them set up strong [complaint and redress mechanisms, including clear referrals and reporting procedures](#) to report violations.
  - You should always [monitor their performance](#) and report cases of misconduct to authorities.
- ❑ You should engage with community structures, authorities and regulatory bodies to ensure compliance.
- ❑ You may also consider joint campaigns with providers, government and communities to get their buy in.

*Note: Where you work with intermediate providers (e.g. when working with aggregators, include clauses in your base contracts (i.e. hold them accountable for sub-contractors).*

## When partnering with private sector partners, we must ensure they integrate protection issues, including sexual exploitation and abuse (SEA), in their operations

The aim of this tipsheet is to ...

- Equip private sector partners with **tools to understand, prevent and respond to SEA**.
- **Encourage positive behaviours** and the provision of responsible products and services that empower people as valued customers.
- Help you **assure service quality and customer protection** and **hold partners accountable** for misconduct.

### 8 Principles of Code of Conduct

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Tired of reading? Watch the video here

Download the Code of Conduct Templates [HERE](#)



**How can we strengthen protection from SEA without deterring partners from wanting to work with us?**

While there is usually a willingness to 'do things right', private sector partners are mainly **driven by monetary rewards**, use different language and may not understand humanitarian principles. This means ...

- ✓ **Don't overwhelm** partners with lengthy and resource-intensive contracting/implementation processes and documentation
- ✓ Cut out jargon/adapt language and help partners understand the **'business case'** for investing in customer protection as a shared responsibility
- ✓ Have **ready-to-use materials/supports** that the partner can easily understand and implement
- ✓ **Promote good behaviour**

... **without** compromising on minimum standards.

### Checklist - working with private sector

- ☐ **Assess organisational capacity on Customer Protection when hiring/contracting partners**
  - ☐ Assess private sector partner **organizational policy on Customer Protection/PSEA**- use [this Checklist](#) during the procurement/recruitment stage.
  - ☐ Ensure private sector partner has a **focal point** on Customer Protection/PSEA in place and build a relationship.
- ☐ **Contractualize key responsibilities and your expectations for the partner**
  - ☐ Add a **PSEA clause** in all contracts and agreements.
  - ☐ Ensure the private sector partner shares the [Code of Conduct](#) with all its staff and third-party contractors.
  - ☐ Regularly request [reporting on customer feedback and complaints](#) (e.g. received through a hotline or helpdesk) and [ensure safe referrals](#) by adding it to your contract.
- ☐ **Support partner capacity strengthening**
  - ☐ **Share simple and concise awareness materials** (visual material/messages and referral pathways) you would like the private sector partners/contractors to use (internally and externally). You may opt to **offer [training sessions](#)** on PSEA to partner staff.
  - ☐ Make it as easy as possible to **align your [reporting channels for customer feedback and complaints](#)** for their staff, contractors, and the people assisted and share guidance on safe referrals.
- ☐ **Ensure accountability**
  - ☐ Ensure **disciplinary measures for violations are understood** (e.g. as part of [performance monitoring & evaluation](#)).
  - ☐ Ensure [communities know about SEA](#), **their rights and how to report issues** with regards to the private sector partner.

Access the full repository of tools and materials [here](#)



## Monitor and assess the performance of private sector actors regularly

- **WHY** Monitoring the performance of private sector actors is essential because **humanitarian actors rely more and more on them to deliver cash transfer services**. While the service provider is responsible to provide adequate services (contractual obligations), the humanitarian organisation remains **accountable to the people assisted** - to ensure safe, reliable assistance, free of abuse.
- **WHAT** You should regularly assess the **service quality across interaction touch points**, including technical reliability, services delivered by employees/agents and the **functioning of the service providers own customer service/protection mechanisms**, such as their hotline or helpdesk.

### HOW can we assess private sector actor performance?

- Conduct regular **post-distribution monitoring surveys & [focus group discussions](#)** to gather user experiences. Consider conducting an in-depth [user journey](#) exercise.
- **Periodic performance reviews**: Conduct regular assessments (min. 1 per year), incl. feedback from community, partners and gender/protection/inclusion experts.
- **'Mystery shopping'**: Test services anonymously to evaluate customer experience and service quality during interactions. This can be done by humanitarian staff and local partners, but also by involving community members or paying external providers to test services. [Here](#) are some ideas on how to set this up.
- **Reporting & functioning of referral system**: Service providers are required to track, refer, resolve and **report complaints or technical issues systematically** to the humanitarian organisation. Conduct random checks on functioning of the [complaints reporting system](#), especially for sensitive complaints that require [training](#). Don't forget to check your internal and partner reports for customer feedback!
- You should also **conduct spot checks on all complaint and feedback channels** (such as physical helpdesks and hotlines) to check that they are working properly. *E.g. Do this by calling the hotline and reporting a fake complaint (i.e. test the call centre responsiveness and referral quality).*
- **Independent audits/certifications**: Ensure transparency and accountability through third-party certifications e.g. [GSMA certification](#) or [Client Protection Certification](#).
- Consider **anonymous grievance reporting tools** e.g. [RapidPro](#), [TalktoLoop](#).



Technical service delivery/ system reliability

Customer service/ conduct of employees & contractors

Functioning of providers Complaint & Feedback Mechanisms

Here are **8 questions** you could ask to assess private sector partner performance:

Area of assessment	Questions to ask
1 - Reliable & timely payments	Are you/(people) receiving the right amount of money/service on time?
2 - Safety	Do you/(people) feel safe when interacting with service providers (in person, on the phone)? Why not?
3 - Respectful treatment & customer service	Do service providers treat you and everyone else/(people) with respect and listen to your/their concerns when help is needed? Why not? <i>Follow-on question: If you/(people) had a complaint in the past – were support teams available? Was the response quick, helpful and complete? Why not?</i>
4 - Fraud & misconduct	Have you/(people) seen or heard of any cases of fraud or other misconduct by providers?
5 - Exploitation & abuse	Do service providers ask you/(people) for favours ( any type) in exchange or more/quicker access to money/services?
6 - Protection of personal information	Do service providers ask for your/(people's) personal information, such as your PIN number or marital status?
7 - Clear communication	Do service providers explain things clearly (in local language) so that everyone can understand? Why not?
8 - Customer satisfaction	Would you/(people) recommend the service provider to a friend? Why not?

The above questions are qualitative in nature - you can also develop indicators and track them in dashboards/analytics tools over time.

## 8 Principles expected from everyone providing services relating to the delivery of assistance.

### 1 - TREAT ALL CLIENTS WITH DIGNITY AND RESPECT

#### Why is it important?

- Clients may lack the protection they previously enjoyed in their country or community.

*For example, a client may have recently fled from their home and is exhausted and afraid.*

#### What does it mean for you?

- Always be respectful and considerate towards clients.
- Degrading comments or behaviour is not acceptable.
- Remember, what you say and how you say it matters.
- Think about how you would like to be treated.

### 2 - ENSURE FAIRNESS TOWARDS ALL CLIENTS

#### Why is it important?

- Clients may use financial services for the first time and not be familiar with procedures.

*For example, a client may not speak the local language or not know how to read.*

#### What does it mean for you?

- Give all clients clear and concise information and make sure all communications are understood
- Remember, it is the duty of everyone to ensure fair treatment of all clients without discrimination.

### 3 - PREVENT AND COMBAT ALL EXPLOITATION AND ABUSE

#### Why is it important?

- As financial service provider you are in a position of power. It is essential to ensure your client's safety, dignity and trust.

*For example, elderly or illiterate clients may depend on you to access their assistance.*

#### What does it mean for you?

- Any form of exploitation/abuse towards clients, including of a sexual nature, is not tolerated.
- Remember, you must not engage in any sexual activities with clients in return for the services you provide.

### 4 - RESPECT LAWS AND POLICIES

#### Why is it important?

- Compliance with applicable laws, regulations, policies and standards is a personal responsibility.

*For example, a client may not know what is considered illegal.*

#### What does it mean for you?

- Follow the rules and laws that apply to your work.
- Do not ask your clients for any undue fees.
- Remember, failure to respect laws and policies may lead to loss of clients, loss of business, or penalties.

### 5 - PRESERVE CONFIDENTIALITY AND PRIVACY

#### Why is it important?

- As part of delivering financial services, you may receive confidential information or clients' personal data.

*For example, your logbook of transactions contains sensitive information about your clients*

#### What does it mean for you?

- Take care in handling people's personal data and do not share it with others without authorization.
- Remember, building/maintaining trust is an important part of your relationship with clients.

### 6 - REJECT BRIBERY AND CORRUPTION

#### Why is it important?

- Accepting or requesting bribes or offers of favours is unacceptable, dishonest, and damaging.

*For example, a client may propose to reward you in return for your speedy provision of services.*

#### What does it mean for you?

- Do not accept or request gifts from clients. Reject bribery and corruption in all forms.
- Remember, positive client relationships can and should be developed free of bribery and corruption.

### 7 - ENSURE INTEGRITY AND RESPONSIBILITY

#### Why is it important?

- Provision of financial services is based on integrity and trust as perceived by clients and other stakeholders.

*For example, a client may not fully understand the applicable fees and trusts that you apply them correctly.*

#### What does it mean for you?

- Act ethically, responsibly, professionally and with integrity at all times. Set a good example.
- Remember, everyone has the responsibility and ability to make a positive contribution.

### 8 - REPORT CONCERNS AND COMPLAINTS

#### Why is it important?

- Everyone has an important role to play complying with standards and raising possible issues.

*For example, you may see a colleague of yours shout at or threaten a client.*

#### What does it mean for you?

- If you see anything that does not feel right, you have to speak up and report it.
- Remember, you must report any potential issues as soon as you notice them.

***[Use this template if you want the financial service provider you work with to sign up to the Code of Conduct – Company headquarters version]***

As **[Organization Name]**, we hereby confirm that we have thoroughly read and understood the requirements and expectations outlined by **[Contracting Organization]** and fully agree to uphold the eight principles set forth in this document.

## 8 Principles of Code of Conduct

**1 TREAT ALL CLIENTS WITH DIGNITY AND RESPECT**

**2 ENSURE FAIRNESS TOWARDS ALL CLIENTS**

**3 PREVENT AND COMBAT ALL EXPLOITATION AND ABUSE**

**4 RESPECT LAWS AND POLICIES**

**5 PRESERVE CONFIDENTIALITY AND PRIVACY**

**6 REJECT BRIBERY AND CORRUPTION**

**7 ENSURE INTEGRITY AND RESPONSIBILITY**

**8 REPORT CONCERNS AND COMPLAINTS**

**[Organization Name]** hereby commits to:

- **Disseminate the Code of Conduct** to all relevant employees and third-party contractors.
- **Ensure that all staff and third-party contractors are capacitated and trained** to adhere to the principles.
- **Guarantee** that the **Code of Conduct video** **[or similar video developed by your organisation]** and this signed document will be distributed and reviewed with all staff and third-party contractors before the commencement of the project.
- **Report cases** to **[Organization & insert Hotline Number]**
- Ensure all our **employees or third-party contractors can be easily identified** when they deliver services for our organization.
- **Take corrective action** and implement appropriate penalties in cases where wrongdoing by our employees or third-party contractors is identified, ensuring that all instances of misconduct, including violations of Protection from Sexual Exploitation and Abuse (PSEA) standards, are reported and addressed promptly and effectively.

By signing below, **[Organization Name]** confirms its **commitment to these actions and principles of customer protection, ensuring people's safety, fair treatment and protection, including from sexual exploitation and abuse.**

\*\*\*

Signature of Authorized Representative **[Organization Name]**: \_\_\_\_\_

Name of Authorized Representative: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

**[Organization Logo]**



***[Use this template if you want the financial service provider you work with to sign up to the Code of Conduct – version for field agents to be managed by the company]***

I \_\_\_\_\_ [Name] confirm that I have read and fully understood the responsibilities and expectations outlined in this document and hereby confirm that ...

## 8 Principles of Code of Conduct

1	... I AM RESPECTFUL TO ALL MY CLIENTS	✓
2	... I AM PATIENT AND FAIR	✓
3	... I DO NOT EXPLOIT OR ABUSE MY CLIENTS (INCL SEXUAL ABUSE)	✓
4	... I FOLLOW THE RULES AND LAWS	✓
5	... I KEEP CLIENTS' PRIVATE INFORMATION SAFE	✓
6	... I SAY NO TO BRIBES AND CORRUPTION	✓
7	... I AM RESPONSIBLE AND TRANSPARENT	✓
8	... I SPEAK UP IF SOMETHING IS WRONG	✓

\*\*\*

I understand that not following these rules can lead to penalties, including losing my job and facing legal action.

By signing below, I promise to follow these rules to ensure everyone is safe, treated fairly, and protected from harm, including taking action to prevent violence and exploitation.

Signature of Agent: \_\_\_\_\_

Full Name: \_\_\_\_\_

[Organization  
Logo]

Location: \_\_\_\_\_

Date: \_\_\_\_\_