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TOOLKIT: RESPONSIBLE CASH

# Engaging with private sector

## 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.

### 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**
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- REPORT CONCERNS AND COMPLAINTS**

Download the Code of Conduct Templates **HERE**

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**.



## 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**
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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.

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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

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**[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: \_\_\_\_\_