

## 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

- 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](#)

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).*