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Specific resources aimed at Financial Service Providers

Setting up a strong customer protection system

What is this document about?	This document aims to support collaboration with humanitarian organizations. It contains tools and resources to strengthen customer protection, mitigate risks of abuse of power, and ensure compliance with regulations and contractual obligations.
	It contains simple and editable resources to help financial service providers streamline processes, safeguard disadvantaged customers, and set a high standard for both reliable and responsible service.

What is this document about?	• The below checklist helps financial service providers **strengthen customer protection, reduce risks, comply with regulations and contractual obligations, and build trust with humanitarian partners and recipients.** • It includes links to templates and best practice examples, to make processes smoother, ensure fairness, and **set a standard for good and excellent service**.

How strong is your Customer Protection system? Use this Checklist to find out!

Use this checklist to see which measures are already in place. For those you haven't ticked yet, consider them priority areas to strengthen - working with your humanitarian partners and available tools.

Essential measures to establish a strong customer protection system	YES	PARTIAL	NO
Code of conduct – Do you have a clear **Code of Conduct**, outlining acceptable behaviours and consequences for misconduct, signed by all employees, subcontractors and agents? See audiovisual examples **here**.	☐	☐	☐
Contracts & recruitment – Do your contracts and partnership agreements with subcontractors have a **standard clause on customer protection**, incl. formal procedures for recruiting and vetting staff?	☐	☐	☐
Transparent communication & feedback – Do you provide clear, understandable information in adequate language to customers about their rights and complaint options? Do you have confidential **customer service channels** in place that are easy to use, culturally appropriate and available in local languages? Are these widely communicated and trusted by your customers? Click **here** for more information.	☐	☐	☐
Safe referral mechanisms – Have you established **referral pathways** with humanitarian partners and trained your staff on sensitive complaints, such as fraud, gender-based violence, incl. on **sexual exploitation and abuse (SEA)**? *NB: Even if the complaint is not about humanitarian assistance or staff, ask your humanitarian partners to share local referral contacts (medical care, legal assistance, or protection services)! Personnel handling customer complaints must be trained to manage them safely and confidentially to prevent harm to victims, witnesses, or whistleblowers.*	☐	☐	☐
Reporting mechanisms – Do you maintain a centralized complaints database, track and analyze complaints for systemic issues to improve service? Do you regularly share reports on complaints and resolutions with the concerned humanitarian partner (in aggregated, non-identifiable form)?	☐	☐	☐
Training on customer protection – Do you provide **mandatory training for employees and agents on ethical and respectful behaviour**, avoiding assumptions based on traditional gender roles and ensuring equal treatment for men and women and SEA prevention? **Find template**	☐	☐	☐
Customer education campaigns – Do you provide **learning and sensitization sessions** on handling finances/using digital services to help customers recognize and avoid abuses, incl. SEA? **Find ideas here**	☐	☐	☐
Agents & merchants network supervision & monitoring – Have you implemented **formal procedures to supervise agents and intermediaries**, incentivize them to promote service excellence, monitor customer protection risks, and conduct regular checks to prevent misconduct?	☐	☐	☐
Inclusive hiring practices – Do you recruit and train women for client-facing roles to reduce power imbalances and **unlock opportunities** for female customers?	☐	☐	☐
Customer data protection – Do you count with robust safeguards to protect customers' personal and financial data from misuse. **Examples of international standards**	☐	☐	☐
Additional opportunities to strengthen customer protection	YES	PARTIAL	NO
Anonymous reporting options – Do you have mechanisms for anonymous complaints to encourage reporting in **sensitive cases**?	☐	☐	☐
Embrace best practices – Are you aware of any additional best practices by your national regulator or other industry champions related to customer protection?	☐	☐	☐
Customer Protection Focal Point or team – Do you have designated customer protection teams/focal points within your institution (with specific job descriptions)?	☐	☐	☐
Do you promote customer protection when recruiting new staff (in job advertisement, interview questions etc.)? You may also provide **Tipsheets** for new staff.	☐	☐	☐
Do you conduct regular User Journeys to map protection risks and opportunities for specific segments (women, people with disabilities, people who are illiterate, Indigenous Peoples)? **Here is an example**	☐	☐	☐

TOOLKIT: RESPONSIBLE CASH
Code of Conduct for private sector partners
[extended version with explanations, English]

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.

WFP World Food Programme

TOOLKIT: RESPONSIBLE CASH
Code of Conduct for private sector partners
[simplified, company headquarters, English]

UNHCR The UN Refugee Agency

[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: _____

[Organization Logo]

Date: _____

TOOLKIT: RESPONSIBLE CASH
Code of Conduct for private sector partners
[simplified, field staff/ field agent, English]

[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: _____

What is this document about?	
	• Strong complaint and redress mechanisms **help you improve service quality, grow and maintain client trust and ensure you follow national rules and laws** set by regulators. This document provides a **checklist** to help you set this up. • Need some practical inspiration? Here are [examples](#) of complaints/redress mechanisms.

Always build on **what you already have in place** – e.g. processes to detect/manage fraud cases.
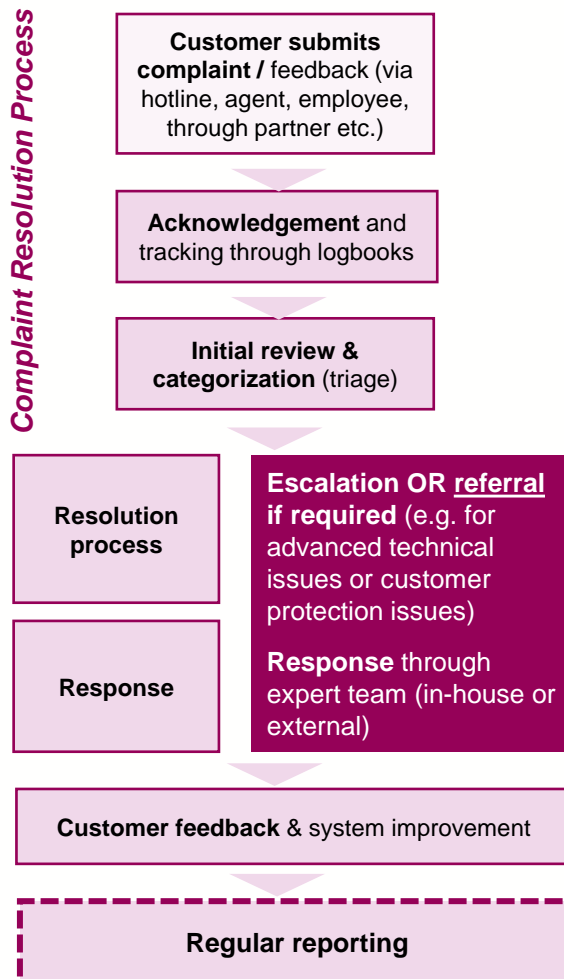
Here is a checklist for setting up or strengthening complaint/redress mechanisms:

- ☐ **Clear governance & accountability**
  - ☐ Define **roles/responsibilities** for complaint handling. It is best practice to have **dedicated complaints resolution desks/hotline staff & a specialised customer protection unit** for sensitive cases (fraud, gender-based violence, incl. sexual exploitation & abuse)
  - ☐ Define **standard operating procedures** for receiving, documenting, and resolving complaints, incl. **clear timelines** for response, escalation and **safe referrals** (overleaf is a script to ensure sensitive issues are referred/dealt with appropriately)
  - ☐ Ensure **referral systems are in place** between different partners. **Ask for the referral contact lists from humanitarian partners/protection clusters!**
  - ☐ Ensure redress mechanisms are compliant with **national regulations**.
- ☐ **Accessible & transparent feedback channels**
  - ☐ Offer **multi-channel options** (online, in-person, phone, mobile apps), that are **accessible** (e.g. for [persons with disabilities](#)), channels to be **free of charge**
  - ☐ Plan for [customer education programmes](#) to explain **rights, complaint processes** and expected response time
- ☐ **Customer protection**
  - ☐ Ensure fairness, confidentiality, data protection and ease of access for all. Ensure staff follow the [Code of Conduct](#)
  - ☐ Budget for [staff training](#) on **complaint handling and customer rights** (NB: your hotline staff and customer protection teams should get advanced training!) [Tipsheet](#)
  - ☐ Ensure customers **receive acknowledgment** of complaints and **updates on resolution progress**

- ☐ **Reporting & oversight mechanisms**
  - ☐ Maintain a **centralized complaints database**
  - ☐ Track and analyse complaints for systemic issues, to improve service
  - ☐ **Regular reporting** on complaints data and resolutions
  - ☐ **Establish oversight** by setting up an independent monitoring function and performing regular audits

Refer to the [**IASC Standards for Collective Feedback Mechanisms**](#) **or** [**AFI resources**](#) for more information.

Complaint Resolution Process

Customer submits complaint / feedback (via hotline, agent, employee, through partner etc.)

↓

Acknowledgement and tracking through logbooks

↓

Initial review & categorization (triage)

↓

Resolution process

Response

Escalation OR referral if required (e.g. for advanced technical issues or customer protection issues)

Response through expert team (in-house or external)

↓

Customer feedback & system improvement

↓

Regular reporting

What is this document about?	• The script aims to help **call center agents and other client-facing staff** to communicate safely, respect privacy and direct people to support without causing harm. • Find useful templates here: Customer Protection Training, Logbook, sensitive complaints examples (overleaf) & Tipsheet for customer-facing staff

Opening

"Hello, my name is [Your Name]. Thank you for calling [Provider]. How can I help you?" *Listen…*

Triage – ownership or referral & resolution of issue
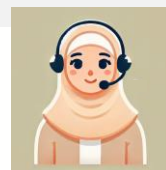
Caller describes incident/complaint

Acknowledge complaint: Log call/complaint in Logbook & continue to categorization

! *NB: If there is no clear caller incident/ if person doesn't want to share detail, ask:* "To better be able to help you – can you tell me if this call is about someone's safety being at risk or something very private? I can connect you directly with someone that can help you best." **if 'yes', do not probe or ask for details** → follow sensitive complaint process

Technical Issue - *e.g. forgotten passwords/PINs, broken/lost SIM cards or bank cards, technical failures etc.*

Other issue e.g. issues when receiving/spending money; didn't receive correct amount; delays; infrastructure breakdown; charging of phones etc.

Sensitive complaint

"Thank you for sharing that with me. I understand this must be difficult to talk about. Can you tell me if it is in relation to *[humanitarian partner]* assistance or staff? *Listen…*"

"I can help you with that….." *Follow [Provider] procedures for technical issues*

"Thank you for sharing that with me. Can you tell me if it is in relation to *[humanitarian partner]* assistance or staff?" *Listen…*

YES

"Thank you for reporting this important issue. In this case, you should reach out to [humanitarian partner] who specialize in handling such situations sensitively and confidentially."

Option A [preferred]: "Do you want me to directly transfer this call?*" If "yes", transfer call*

Option B: "The contact number is *[insert hotline]* or you can go to *[insert name of channel/ location].* They will be able to assist you directly. "

NO

"Thank you for reporting this important issue. In this case, you may need to reach out to our *[customer protection team OR external referral]* who specialize in handling such situations sensitively and confidentially."

Option A [preferred]: "Do you want me to directly transfer this call?*" If "yes", transfer call*

Option B: "The contact number is *[insert hotline].* They will be able to assist you directly."

Follow [Provider] procedures for sensitive complaints

NO

"Thank you for reporting this important issue. I will now connect you to our *[customer protection team]* who specialize in handling such situations. Please hold while I transfer your call." *Follow [Provider] procedures*

Closing

"Is there anything else I can help you with? *Listen… restart the loop if required* "Your feedback is important to us, and we are here to support you. Please take care."

Log call update for reporting and ensure follow-up steps are documented.

NB: it is good practice to regularly ask for customer feedback on customer service provided (e.g. phone surveys)

Distinguishing sensitive and non-sensitive cases (cash transfers examples)

Sensitive cases involve issues that can cause harm, stigma, or safety risks to individuals, such as **sexual exploitation and abuse (SEA)**, **gender-based violence (GBV)**, **child protection concerns**, or breaches of confidentiality. These require urgent, confidential, and survivor-centred handling. Examples include:

A community member **reports that UN/NGO staff requested sexual favors in exchange for providing assistance**

A **financial service provider** agent demanded **favors** to process cash assistance more quickly/skip the queue
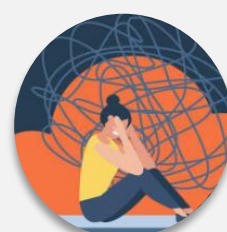
A **partner staff member intimidates and verbally abuses** assistance recipients

A woman reports physical violence and theft by other community members as she leaves the cash distribution site

Assistance meant for **child-headed households** is forcefully taken by **adults** in the community.

A survivor's private information is improperly shared by staff, causing **risks of further harm or stigma.**

Non-sensitive cases include **general complaints or issues**, such as **delays** in aid distribution, **incorrect payments**, or **staff misconduct** <u>not</u> involving exploitation or abuse. These can be addressed through standard feedback mechanisms (either by provider or humanitarian organisation). Examples include:
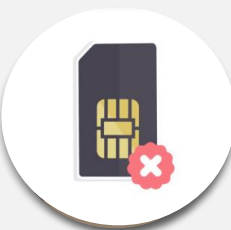
A women approaches a mobile money agent about an **expired sim card**

Person calls because of a **locked SIM card or forgotten PIN code**

Targeted population did **not receive the expected quantity of the notes** given by the bank. NB: depending on the case, this could be fraud and therefore a **sensitive issue!**

Crowd control measures are insufficient, and distributions lack orderliness at cash-in-hand distribution

Members of the community are **giving e.g. their ID cards as a guarantee to get line of credit to shopkeepers** (can no longer get their entitlement during distributions)

Financial service provider arrives late for cash disbursement

Expected customer service

- ❑ **Greet and treat clients with the same respect as anyone else**. Remember the **8 Code of Conduct principles? Acknowledge it!**

- ❑ Give people adequate time and attention. **Some people may need more of your time**. Be welcoming to women, elderly persons, Indigenous Peoples, persons with disabilities etc.

- ❑ **Communicate clearly and in a language that the client understands**

- ❑ **Always display available posters and brochures** explaining fees/costs, processes and hotlines for people to get help. **Always display your company identification** e.g. ID/badge.

- ❑ **Be patient** when you are sharing information. Some people are first-time clients.

- ❑ **Address every question -** be mindful of people's digital financial literacy levels and **provide appropriate solutions**

- ❑ **Guide people** through how to use services/solve problems – multiple times if necessary – rather than doing it for them

- ❑ **Never disclose a customer's personal data** to unauthorized personnel, such as contact number and balance information

- ❑ **Assure people about the security of their accounts**. Do advocate for keeping PIN codes and passwords secret - this can prevent fraud

- ❑ **Educate people about the benefits of financial services**. Inform them about other products that might add value for them (loans, insurance etc)

- ❑ **Redirect people** if you don't know the answer. <u>**Always refer people if they disclose sensitive issues**</u> to you (see below). **Do <u>be discreet and do not pry.</u>**

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**
4	**I FOLLOW THE RULES AND LAWS**
5	**I KEEP MY 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**

Watch the video here: https://vimeo.com/309084196

[Sign initials] I promise to follow these rules to ensure everyone is safe and treated fairly.

! **If you see something, say something!** Immediately report fraud, bribes & other illegal activities, any forms of violence, including sexual exploitation and abuse. No matter who is involved.

Call _____

Referrals cheat sheet:

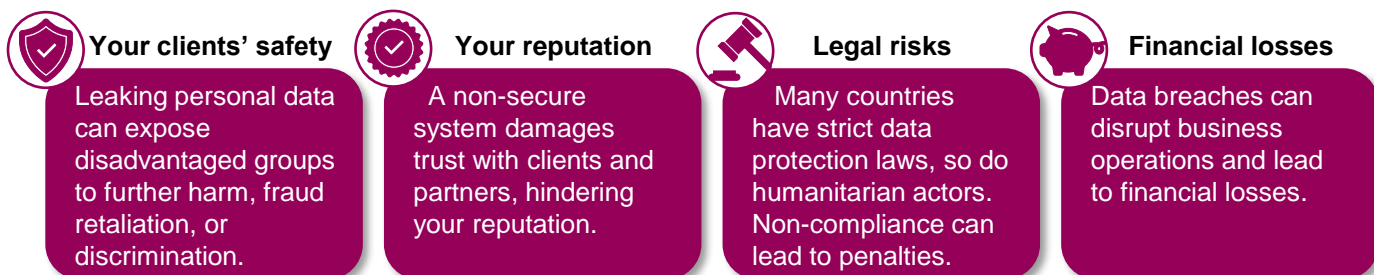| Advanced technical help	Issues with the project	Someone is in danger
✓ Next level escalation for technical problem: _____ ✓ Customer protection service centre (not related to _____ *[organization]* project or staff conduct): _____	✓ Call _____ *[organization]* for any other issue raised: _____ Always remember to report issues, incl sensitive issues [fraud/harm] in your customer protection logbook and call:	✓ Call _____ *[organization]* for any sensitive issue raised: _____ ✓ In case of immediate danger: Police: _____ Health services: _____ [_____]:_____ Always report the issue.

Why data protection matters: Let's hear Amina's story!

"I was grateful for the humanitarian assistance, but now I live in fear. The mobile money agent wrote my personal information on his logbook, but the next client could see everything as he wrote down his data on the same page. He didn't receive assistance though, and now I feel he stares at me with hostility as he saw how much I received. He now knows where I live, and he even got my phone number and sends me harassing messages."
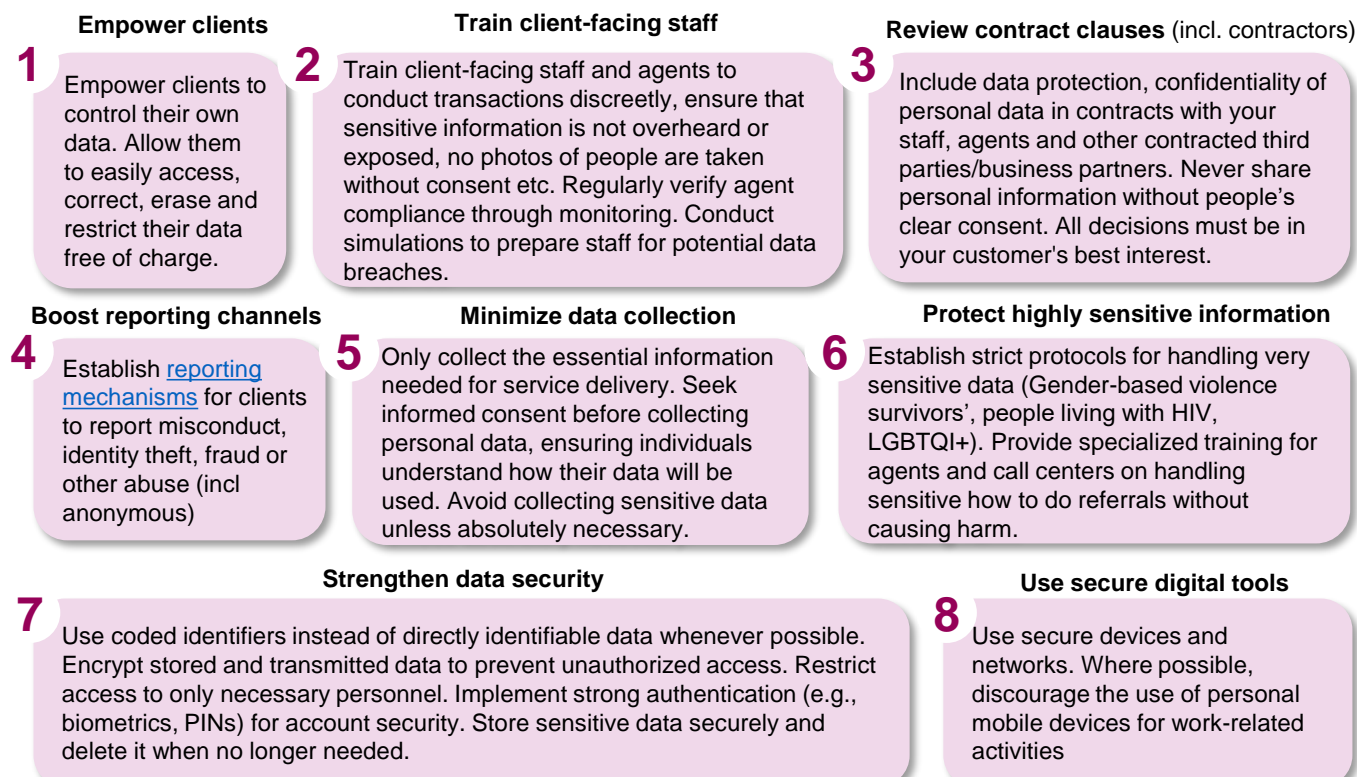
• As Financial Service Provider, you manage highly sensitive personal data about your clients which is required by national regulations to identity customers. Misusing the data causes harm to people. Your staff and agents interact directly with clients, including disadvantaged groups such as migrants, ethnic minorities, persons with disabilities or survivors of gender-based violence (GBV) etc., posing unique risks:

Your clients' safety
Leaking personal data can expose disadvantaged groups to further harm, fraud retaliation, or discrimination.

Your reputation
A non-secure system damages trust with clients and partners, hindering your reputation.

Legal risks
Many countries have strict data protection laws, so do humanitarian actors. Non-compliance can lead to penalties.

Financial losses
Data breaches can disrupt business operations and lead to financial losses.

Protecting client data is good for business!

• In India, 63% of a test group chose a 11% interest-rate loan over a 9% loan to gain higher privacy features. In Kenya, 64% of a test group chose a 10% interest-rate loan with data protection over a 5% loan (CGAP).

• *Remember:* In countries where literacy rates are low, language barriers high, and connections unreliable, customers are unable to give truly informed consent.

Here are **9 tips to protect your client's personal information**:

1 Empower clients
Empower clients to control their own data. Allow them to easily access, correct, erase and restrict their data free of charge.

2 Train client-facing staff
Train client-facing staff and agents to conduct transactions discreetly, ensure that sensitive information is not overheard or exposed, no photos of people are taken without consent etc. Regularly verify agent compliance through monitoring. Conduct simulations to prepare staff for potential data breaches.

3 Review contract clauses (incl. contractors)
Include data protection, confidentiality of personal data in contracts with your staff, agents and other contracted third parties/business partners. Never share personal information without people's clear consent. All decisions must be in your customer's best interest.

4 Boost reporting channels
Establish reporting mechanisms for clients to report misconduct, identity theft, fraud or other abuse (incl anonymous)

5 Minimize data collection
Only collect the essential information needed for service delivery. Seek informed consent before collecting personal data, ensuring individuals understand how their data will be used. Avoid collecting sensitive data unless absolutely necessary.

6 Protect highly sensitive information
Establish strict protocols for handling very sensitive data (Gender-based violence survivors', people living with HIV, LGBTQI+). Provide specialized training for agents and call centers on handling sensitive how to do referrals without causing harm.

7 Strengthen data security
Use coded identifiers instead of directly identifiable data whenever possible. Encrypt stored and transmitted data to prevent unauthorized access. Restrict access to only necessary personnel. Implement strong authentication (e.g., biometrics, PINs) for account security. Store sensitive data securely and delete it when no longer needed.

8 Use secure digital tools
Use secure devices and networks. Where possible, discourage the use of personal mobile devices for work-related activities

Discover new approaches to data privacy and protection here, as well as the EU standards.