

### **USE CASE 4**

Vertical integration
Sharing data on a person with a payments or messaging provider to extend services

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Cover photo: Salvadoran Red Cross supports families from communities with the humanitarian cash transfer assistance program amidst COVID19 (Photo Credit: Cruz Roja Salvadoreña)

#### PROBLEM SUMMARY

In 2016 2.8 billion US dollars was programmed through cash and voucher assistance (CVA)<sup>1</sup> (10.6 per cent of humanitarian assistance). By 2019 this had increased to 5.6 billion US dollars (17.9 per cent of humanitarian assistance). The growth in CVA programming is enabled by the increasing adoption of mobile phones, which facilitate registration, information sharing, and payments for CVA.

By the end of 2021, 5.3 billion people had subscribed to mobile services, representing 67 per cent of the global population<sup>2</sup>. A further 3.2 billion people live in an area with connectivity but are not subscribers.

Usage levels in low-income countries are lower. In sub-Saharan Africa, 40 per cent of the adult population are now connected to mobile internet services. However, another 44 per cent live in areas covered by mobile broadband networks but do not yet use mobile internet services (the usage gap)<sup>3</sup>.

GSMA estimates that by 2025 there will be an additional 400 million new mobile subscribers, most of them from Asia Pacific and sub-Saharan Africa, taking the total number of subscribers to 5.7 billion (70 per cent of the global population)<sup>4</sup>.

Research from the UN High Commissioner for Refugees (UNHCR)<sup>5</sup> in 2016 found that 93 per cent of all refugees live in places that are covered by at least a 2G network, and that 62 per cent live in locations covered by 3G networks. However, the situation in rural areas lags behind. Only 17 per cent of rural refugees live in areas with 3G coverage, compared to 29 per cent of the global rural population, while 20 per cent of rural refugees have no mobile coverage at all, which is double the proportion of the global rural population without coverage.

The same research found that 68 per cent of refugee households in urban locations have an internet-capable mobile phone, versus just 22 per cent in rural locations. These numbers will certainly have increased since 2016. One respondent reported that 95 per cent of the global population had mobile internet coverage in 2021.

Evidence on the current overall adoption of mobile phones by people affected by crises is patchy. There are several context-specific snapshots to illustrate the picture. For example. a 2023<sup>6</sup> study in Lebanon found that almost nine in ten people, from both the refugee and host communities, own a phone. As with the increasing coverage of mobile internet, we can conclude that the level of adoption will continue to increase.

This use case focuses on sharing data on a person with a third party that is contracted to provide a payments or messaging-related service.

## How does this use case relate to the CVA business process?

During the 'Intervention Design' stage an organization may contract a third party to provide messaging or payment-related services.

- 1 CALP Network. 2020. The State of the World's Cash 2020. Cash and Voucher Assistance in Humanitarian Action. www.calpnetwork.org/publication/the-state-of-the-worlds-cash-2020-full-report
- 2 GSMA. 2022. The Mobile Economy Sub-Saharan Africa 2022. https://data.gsmaintelligence.com/research/research/research-2022/the-mobile-economy-sub-saharan-africa-2022
- 3 Ibid.
- 4 Ibid.
- 5 UNHCR. 2016. Connecting Refugees: How Internet and Mobile Connectivity can Improve Refugee Well-Being and Transform Humanitarian Action. <a href="https://reliefweb.int/report/world/connecting-refugees-how-internet-and-mobile-connectivity-can-improve-refugee-well-being">https://reliefweb.int/report/world/connecting-refugees-how-internet-and-mobile-connectivity-can-improve-refugee-well-being</a>
- 6 GSMA. 2023. The Digital Worlds of Syrian Refugees and Host Communities in Northern Lebanon. <a href="www.gsma.com/mobilefordevelopment/blog/digital-inclusion-and-exclusion-amongst-refugees-in-northern-lebanon">www.gsma.com/mobilefordevelopment/blog/digital-inclusion-and-exclusion-amongst-refugees-in-northern-lebanon</a>

#### What are the variations of this use case?

We identified the following variations of this use case.

1. **Data sharing with financial service providers (FSPs).** FSPs may assist with cash and/or voucher-based transfers to recipients. Cash may be in the form of physical currency, a bank transfer or mobile money. Vouchers could be a paper, physical token or digital token that can be exchanged for a set quantity or value of goods or services with specific vendors.

Modality	Characteristics	CVA mechanism	Potential FSPs
Cash	Non-digital (Cash-in-hand)	Direct cash	Humanitarian organisations (no FSP involves)
		Delivery through an agent/ over-the-Counter (OTC)	Banks Exchange office Transfer companies
	Digital (E-payment)	Transfer to bank account	Banks Humanitarian organisations
		Mobile money (e-wallet)	Mobile money organisations
Voucher	Non-digital	Paper voucher	Humanitarian organisations Voucher companies
		E-voucher for commodities (e-wallet; smart or prepaid card)	Voucher companies Banks Transfer companies
	Digital	E-voucher for cash (e-wallet: smart or prepaid card)	Credit card companies Banks Voucher companies

Table 1. CVA delivery mechanisms and their characteristics<sup>7</sup>

2. **Data sharing with bulk messaging providers.** This is typically for the purpose of communicating with recipients of humanitarian assistance. Some of the more common channels used include interactive voice response, short messaging service, instant messaging and email

There is a clear trend towards cash assistance. In 2019 three-quarters of CVA was in the form of cash as opposed to voucher-based assistance<sup>8</sup>. Respondents expected this to continue.

The overall choice of cash or voucher-based assistance and the specific type of cash or voucher used is very context specific. It depends on factors such as mobile network coverage, ownership of mobile phones, literacy, coverage of FSPs and market assessments.

In Uganda for example, the World Food Programme (WFP) reports that 80 per cent of its cash for general food assistance was delivered through prepaid cards, 11 per cent through bank accounts, and 9 per cent through an e-voucher system in 2021<sup>9</sup>.

Similar factors influence the choice of messaging channel used. In countries where access to mobile internet is higher, channels like instant messaging and email offer significant cost savings.

## To what extsent is this use case relevant to the practitioners consulted?

This use case was very relevant to the practitioners consulted. However, almost all examples provided were of data sharing between one CVA practitioner and an FSP or messaging provider.

<sup>7</sup> CALP Network. 2021. Assessment of Financial Services Providers – CVA in Yemen. <a href="www.calpnetwork.org/publication/assessment-of-fsps-cva-in-yemen">www.calpnetwork.org/publication/assessment-of-fsps-cva-in-yemen</a>

<sup>8</sup> CALP Network. 2020. The State of the World's Cash 2020. Cash and Voucher Assistance in Humanitarian Action. www.calpnetwork.org/publication/the-state-of-the-worlds-cash-2020-full-report

<sup>9</sup> REACH. 2021. Assessment of Financial Service Providers – Cash and Voucher Assistance in Uganda. https://reliefweb.int/report/uganda/assessment-financial-service-providers-cash-and-voucher-assistance-uganda-november

Several respondents identified joint framework contracts (particularly with FSPs) as a priority area. The Cash Working Groups in Somalia, Uganda and Zimbabwe have developed approach papers or roadmaps that include this as a recommendation.

The Cash Working Group in Jordan was the only example we found of joint contracting with an FSP. We did not find any examples of multi-agency framework agreements with messaging providers.

Cost savings enabled by bulk procurement were identified by respondents and in the literature as a driver for this approach.

# To what extent – and in which ways – does this use case prevent people from receiving dignified humanitarian assistance?

To answer this question we draw on results from the Cash Barometer<sup>10</sup>. This is an independent accountability mechanism that combines standardized face-to-face surveys with user-centred approaches to allow cash recipients to provide feedback on CVA and participate in decision-making.

It provides insights into recipients' preferences and challenges that they face in the Central African Republic, Nigeria and Somalia. Common themes emerging are poor communication around selection criteria, when assistance will commence and for how long it will continue. The picture on modality preference is more complex. In a blog post 11 Ground Truth Solutions explores the dissonance between a seeming preference for voucher-based assistance and the negative feedback associated with rude or fraudulent vendors. It concludes that a mixture of familiarity bias, courtesy bias and lack of familiarity with alternatives is skewing the results of surveys.

However, improving interoperability with FSPs and messaging providers is just one of a broader set of actions needed to respond to these preferences and challenges. One person taking part in an in-depth, semi-structured interview in February 2022<sup>12</sup> highlighted the need for more support with mobile money: "Unfortunately, I don't understand how mobile money works. I have to ask people to send it for me. I don't even know how to check my balance so when I go to the market, I have to ask people to check my balance after I paid for something. I may be cheated by them and will only know when I speak to someone I trust."

Perhaps more important than reducing friction between practitioners and FSPs/messaging providers is the potential of greater joint collaboration between a group of practitioners and FSPs/messaging providers in the context of integrated programming.

This could potentially focus on communicating with people in relation to:

- the full range of support available and the eligibility criteria
- how to register for support
- feedback when they register for support, including if they are not deemed to be eligible
- feedback on the timeframe for support (when it will start, how much, for how long)
- feedback on how to update their information if their circumstances change
- how to provide feedback or make a complaint.

This approach to communication would respond directly to much of the feedback from recipients. It would also potentially help to reduce duplicate registrations due to recipient error and improve the timeliness of assistance.

<sup>10</sup> Ground Truth Solutions. Cash Barometer. www.groundtruthsolutions.org/projects/cash-barometer

<sup>11</sup> Ground Truth Solutions. 2023. Modality preferences: Are uninformed choices landing us down the wrong road? www.groundtruthsolutions.org/news/modality-preferences-are-uninformed-choices-leading-us-down-the-wrong-road

<sup>12</sup> Ground Truth Solutions. 2022. Exploring the user journeys of women receiving mobile money in Somalia. www.groundtruthsolutions.org/projects/user-journeys-of-women-receiving-mobile-money-in-somalia

#### How do practitioners currently address this use case?

The majority of respondents interviewed provided examples of implementers contracting directly with messaging providers or FSPs. In some cases the lead member of a cash consortium took on this role for other consortium members.

Establishing data-sharing agreements was reported as being largely straightforward. These are usually incorporated into contractual and/or service-level agreements.

FSPs are usually expected to agree to a code of conduct. This is one area where a common, standardized and harmonized approach could be established. Cash Working Groups are well placed to then contextualize any global code of conduct created and facilitate its dissemination.

Respondents reported the use of application programming interfaces (APIs), secure portals and email as protocols used to transfer recipient data to an FSP. Use of email was higher in contexts where there were challenges meeting 'know your customer' (KYC) requirements. Several respondents discussed the need for a dialogue with FSPs to review cases where additional information was required to meet KYC needs.

In some cases providers have implemented secure portals. Implementers are given an account and can login to upload information. Feedback on payments made or messages sent can then be provided through the portal.

A general request from respondents was for better end-to-end integration that avoids the potential for mistakes and/or loss of sensitive data. This is an example of vertical interoperability across a specific business process. This would provide feedback on status of transfers and/or messages sent. Interviews and literature indicate that such integration is possible in these contexts, but integration work has not necessarily been carried out due to budget or capacity constraints.

Broader market forces are an important driver for improved interoperability and data sharing with this use case. An estimated 155 million mobile money transactions valued at 2.7 billion US dollars are made each month in Somalia alone<sup>13</sup>. Contrast this with 5.6 billion US dollars spent on CVA globally in 2019 (an average of 466 million US dollars per month).

We identified several initiatives working towards improved interoperability and data sharing. For the FSP context these include the following:

The **GSMA Mobile Money API**<sup>14</sup> is an initiative developed through collaboration between the mobile money industry and the GSMA. It was created to support the mobile money industry to speak the same technical language by providing a modern harmonized API for mobile money transactions and management that is both easy to use and secure.

**GovStack** has designed a **Payments Building Block specification**<sup>15</sup>. If implemented, this would enable digital financial payments to be tracked, evaluated, initiated, validated, processed, logged, compared and verified against budget. It would also provide interoperability with connections to the various external applications that need payment services to trigger transitions in their own workflow.

The **Digital Convergence Initiative (DCI)**<sup>16</sup> is developing data standards and reference APIs to facilitate integration between social protection management information systems and payment providers. DCI's work on payment interoperability is leveraging G2P Connect<sup>17</sup>, an open source effort to enable government-to-person digital payments built through interoperable standards and design blueprints.

<sup>13</sup> Ibid.

<sup>14</sup> GSMA. What is the GSMA Mobile Money API? <a href="www.gsma.com/mobilefordevelopment/mobile-money/mobile-money-api">www.gsma.com/mobilefordevelopment/mobile-money/mobile-money/mobile-money-api</a>

<sup>15</sup> https://govstack.gitbook.io/specification/v/version-0.9.0/building-blocks/payments

<sup>16</sup> https://spdci.org

<sup>17</sup> https://g2pconnect.global

**Mojaloop**<sup>18</sup> offers a reference model for payment interoperability that can be used to overcome barriers that have slowed the spread of digital financial services. Whole, adapted, or as a blueprint – the Mojaloop Foundation's open source software can be used by organizations to build interoperable, digital payment systems that enable seamless, affordable financial services between individual users, banks, government entities, merchants, mobile network operators, providers and technology companies – connecting people who are underserved with the emerging digital economy.

There are also examples of integration between specific solutions. These could be analyzed to inform broader approaches to interoperability.

WFP has integrated **SCOPE** with **Western Union**. This was reported as an end-to-end integration that avoids the potential for mistakes and/or loss of sensitive data and provides feedback on the status of transfers. WFP has also created a portal for FSPs. This provides a secure way for FSPs to access payment lists and KYC-related data.

**RedRose** is integrated with many mobile money operators and banks as well as other cash distribution mechanisms. Depending on the FSP, it allows for the full management of cash-based interventions (reporting, operation and bank integration) in a single environment.

There are a wide range of messaging aggregators that support a range of different channels in a number of countries. These include Twilio, Clickatell, Africa's Talking and Viamo. Each offer a combination of APIs, client portals and email as the protocol for exchanging data. While these tend to take a similar approach, we did not find any overall standard approach for messaging APIs.

#### WFP's approach to mobile money in Somalia

A GSMA process mapping report<sup>19</sup> documents how SCOPE integrates with an FSP in Somalia

Using the mobile money system, recipients are registered (name, fingerprints, etc.) in the SCOPE system (1.a) and are issued with a SIM card if they do not have one (1.b.) by the local partner, who then shares the recipient list with WFP (1.c).

WFP then initiates a bank transfer to Hormuud (2.a.), that tops up the WFP mobile money account (2.b.). The WFP then shares a list of registered recipient phone numbers to Hormuud through a portal (2.c) that checks the phone numbers and sends the names the phone numbers to WFP (2.d.).

When the names do not match the phone numbers, WFP provides the recipients with SIM cards (2.e.) and once the reconciliation process is completed, WFP sends the funds to the recipients directly through the WFP portal (2.f.). Recipients are then free to withdraw their money at mobile money agents or pay for goods at local merchants (3.a.).

Finally, WFP conducts post-distribution monitoring on a sample of its recipients to measure money usage (3.b.).

<sup>18 &</sup>lt;a href="https://mojaloop.io">https://mojaloop.io</a>

<sup>19</sup> GSMA. 2021. Developing guidelines for cash transfers in Somalia. Recommendation 4. <a href="www.gsma.com/">www.gsma.com/</a> mobilefordevelopment/wp-content/uploads/2021/05/4\_SOP-Recommendation-4\_Web.pdf

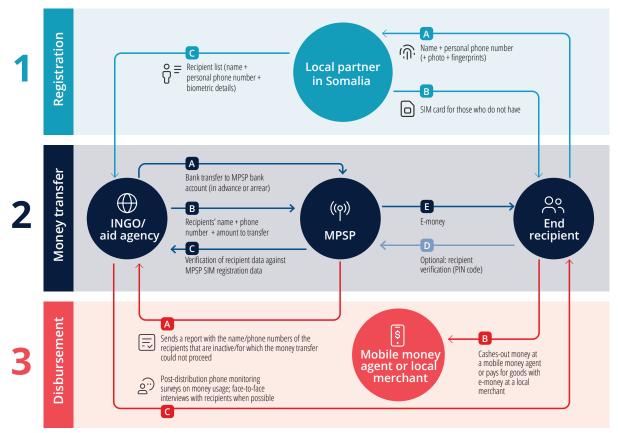


Figure 1. Mobile money cash transfer in Somalia: Current state mapping  $^{20}$ 

MM = mobile money

MPSP = Mobile Payment Service Providers

#### Overview of agreements with FSPs in Uganda

The Cash Working Group in Uganda completed a mapping of practitioners to understand which FSPs it has agreements with<sup>21</sup>. This is summarized in the table below.

#### **Cash delivery**

#### Agent banking with e-card

1 Collaborative Cash Delivery Network (CCD) agency holds a contract with Equity Bank; a second is exploring using Equity via a memorandum of understanding with WFP; UNHCR and WFP hold contracts with Equity Bank

#### Mobile money

15 agencies use mobile money (of which 11 are CCD agencies)

#### Direct contracts:

- Airtel: 6 agencies (including 2 CCD, plus UNHCR and WFP)
- MTN Uganda: 3 agencies (including 2 CCD)

#### via aggregators:

- 4 CCD agencies using the Beyonic platform
- 4 agencies (including 3 CCD) using Stanbic Bank
- 1 CCD agency using True African to aggregate transfers to MTN Uganda, Airtel and potentially Africell

<sup>20</sup> GSMA. 2021. Developing guidelines for cash transfers in Somalia. Process Mapping. https://www.gsma.com/mobilefordevelopment/wp-content/uploads/2021/05/0\_SOP-Process-Mapping\_R\_Web.pdf

<sup>21</sup> Uganda Cash Working Group. 2020. Towards More Common Cash? An approach paper for the Uganda Cash Working Group. <a href="https://data.unhcr.org/en/documents/download/91799">https://data.unhcr.org/en/documents/download/91799</a>

#### E-vouchers with e-card

4 CCD agencies using RedRose platform (ONE Solution/ONEapp, or agency-customised) and e-cards – via existing organisational global framework agreements

1 CCD agency using CompuLynx COMPASS app and e-cards

#### Cash in transit

7 CCD agencies hold contracts with and use Post Bank; 1 uses SGA Bullion UNHCR and WFP hold contracts with and use Post Bank

#### Paper vouchers

4 CCD agencies using paper vouchers – all for food security and/or agricultural support

#### Cash in hand/direct

6 agencies using direct cash where no other option is available

#### Direct bank account to bank account transfers

6 CCD agencies make bank account to bank account transfers

#### Other delivery mechanisms

Koboko United Savings and Credit Cooperative Organization (SACCO); smart card (WaterCard)/ Grundfos water stations in West Nile; cash deposited directly into a Village Savings and Loan Association (VSLA) box

Table 2. Agreements with FSPs in Uganda

#### The Common Cash Facility in Jordan

The Common Cash Facility (CCF) is a platform used by UN agencies, NGOs and the Jordanian government (municipalities) to deliver cash assistance to the most vulnerable refugee and Jordanian households. At the point it was evaluated<sup>22</sup> the CCF was used by ten humanitarian organizations (two UN and eight other humanitarian agencies) to deliver 118 million US dollars to some 40,000 refugee families. This represented more than 90 per cent of the cash assistance provided to Jordan's most vulnerable refugees living outside camps.

The CCF uses a public–private partnership approach, contracting with a financial service provider (currently the Cairo Amman Bank), which provides transparent and equal services to all agencies under the CCF Agreement.

The distribution and reconciliation process is described as follows:

- Eligible refugees receive a text message informing them when their cash is available for withdrawal.
- Refugees scan their iris at an iris-enabled ATM, and a digital wallet shows the amount allocated to them by each participating organization.
- The recipient withdraws funds from each organization's bank account in one go.
- A reconciliation report is sent from the bank to each organization, detailing each beneficiary account status.
- Refugees who do not withdraw funds by the end of the month are contacted by the humanitarian partners, and if they cannot be reached after several attempts they are removed from the list.

Net assistance delivered	Cost per upload	Reduction by tier
≤ \$45m	2.2% (+15% base = 2.53%)	Base rate
> \$45m and ≤ \$55m	2% (+15% base = 2.3%)	Reduced by 10%
> \$55m and ≤ \$70m	1.65% (+15% base = 1.9%)	Reduced by 25%
> \$70m	1.45% (+15% base = 1.67%)	Reduced by 34%

Table 3: Bank fees and authentication costs, showing implications of scaling up/down (US dollars)

One important incentive in the CCF has been the reduction in fees enabled by bulk procurement. Bank transfer fees have reduced from 2.5–5 per cent to 1.67 per cent, and participating agencies report reduced human resource requirements to assist beneficiaries.

The evaluation cites a list of preconditions to replicate this approach. Two important considerations are open inter-agency access to a central database of identified vulnerable people that is sufficiently robust to adapt to reach multiple groups of beneficiaries and the existence of an FSP that can reach all the people enrolled. Potentially this second condition could be tackled via use of an aggregator that routes payments through different FSPs.

#### **Current blockages and challenges**

#### Governance challenges

There is a broad market for financial and messaging services – beyond the scope of CVA – which has already driven standardization for both areas to an extent. Government regulation is also largely aligned for both KYC requirements for bank account or mobile wallet and SIM card registration. KYC requirements are typically more onerous than SIM registration.

In most cases this consists of name and address<sup>23</sup>. However, the documents required to verify name and address differ according to the context and present one of the biggest governance-level challenges for this use case.

One respondent reported that older Ukrainian and Russian identity (ID) cards (with no expiry date) were rejected by MoneyGram. KYC legislation required that all ID cards include an expiry date. This particularly impacted on older people who were among the most vulnerable.

Many refugees lack the official ID documents needed for the KYC altogether. Obtaining a new government ID needed to meet KYC requirements could take several months.

A coalition between GSMA, UNHCR and local mobile network operators pioneered one approach to solving this problem. This involved working with the Government of Uganda to encourage a proportionate regulatory policy<sup>24</sup>. Under the new policy more than 600,000 refugees who did not have government-issued refugee IDs but had attestation letters issued by the Office of the Prime Minister were now legally able to access mobile-enabled services in their own names. This also included verification against the UNHCR/Office of the Prime Minister database of registered refugees.

There are further opportunities to address governance-related challenges. Aside from the Jordan CCF we did not find examples of joint procurement or framework agreements with either FSPs or messaging providers. Some respondents suggested that this was planned for WFP and UNHCR in some contexts.

This would help to establish common norms and standards that pave the way for technical and operational alignment. This could also potentially provide cost savings as well.

<sup>23</sup> See https://withpersona.com/blog/global-kyc-a-kyc-breakdown-by-countries, https://shuftipro.com/compliances-reports/uganda.pdf or https://shuftipro.com/compliances-reports/malawi.pdf for examples.

<sup>24</sup> GSMA. 2020. Proportionate regulation in Uganda: A gateway for refugees accessing mobile services in their own name. Case study. Mobile for Humanitarian Innovation. <a href="https://www.gsma.com/mobilefordevelopment/resources/proportionate-regulation-in-uganda-a-gateway-for-refugees-accessing-mobile-services-in-their-own-name">www.gsma.com/mobilefordevelopment/resources/proportionate-regulation-in-uganda-a-gateway-for-refugees-accessing-mobile-services-in-their-own-name</a>

#### Operational challenges

A number of operational challenges were identified by respondents and in the literature review.

While being aware of better alternatives, several respondents gave examples of payments lists being shared with FSPs via emailed Excel files. These could be easily modified, hence introducing the potential for fraud or error. Manual processes were reported as being common, with the possibility of data entry errors when entering recipients' phone numbers, names, amounts to transfer or when ordering the payment.

Emailing Excel files (even if password protected) also raises privacy and data protection concerns. Recipient transfer lists contain personally sensitive information such as the name of the recipient and the date on which they will receive a certain amount of money. Misuse of this data could put recipients at risk.

Transfer processes were reported as complex and time consuming. In some cases recipient lists that have completed KYC verification were reported as not being saved by the FSP, requiring the same data to be sent again each time a new transfer is required. Fixing problems where data needed for KYC is missing or a payment failed due to incorrect payment details is time consuming and a common cause of delays to payments.

While the respondents and literature indicated a clear awareness of better alternatives (e.g. API integrations or payment portals), the level of adoption of these appears to be patchy.

Payment landscapes are complex. A UNHCR mapping<sup>25</sup> illustrates the differing capacity of FSPs to reach different refugee settlements in Uganda. No single FSP has capacity to reach all settlements. CVA practitioners may therefore need agreements with multiple FSPs, depending on where they are working and choice of modality. This could potentially be alleviated by working with a payment aggregator that has the ability to route a transfer via the most appropriate FSP.

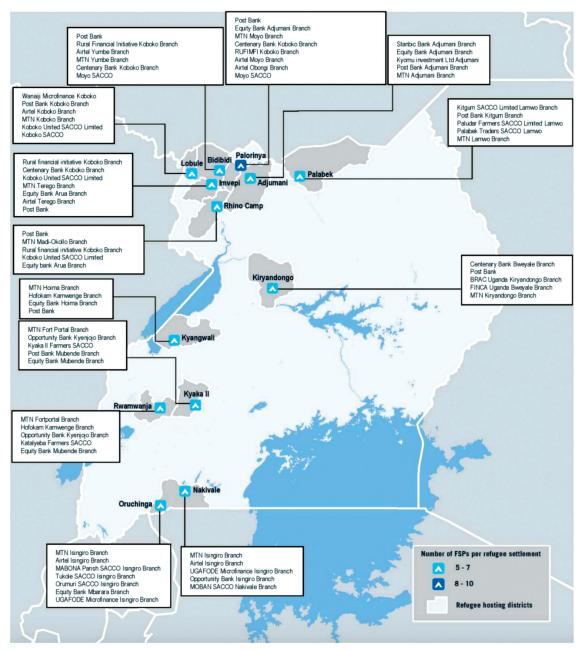


Figure 2. Assessed FSPs with reported capacity to provide services in nearest settlement

#### Technical challenges

A key technical challenge is the need for audit trails and change logs. These would help verify who made changes and provide evidence that a payment was received by a recipient. This is a standard feature in systems (e.g. RedRose) where integrations have been completed with FSPs. While technically straightforward, this must be aligned with data retention policies. One respondent cited a retention policy requiring data to be deleted at the end of a programme. This did not allow for donor audit requirements, which could follow up to five years after the completion of a project.

#### Semantic challenges

Semantic challenges were reported by several respondents. A self-registration app used in the Ukraine response was designed not to accept Cyrillic characters as several FSPs would not accept non-Latin inputs. People instead had to use Latin characters to write their names. However,

this then caused problems with KYC requirements as the Latin character names did not match the Cyrillic names on accompanying ID documents. This required manual correction which took around 20 minutes per entry.

#### Data protection regime

The relevant data protection purpose is provision of a service. The legal basis used could be vital or public interest or informed consent.

There are several other data protection issues to consider.

Know your customer/KYC is a term that broadly refers to the policies and regulations that require certain businesses to have a clear picture of who their customer is. It is also commonly known as ID verification and customer due diligence. KYC regulations serve many purposes, but they are most commonly used to combat money laundering, the financing of terrorism, and other financial crimes. With this in mind, KYC laws usually apply broadly to businesses that are considered 'financial institutions' or which are otherwise deemed to carry a high risk of financial crime.

While the overall KYC requirements are broadly similar, the specific documents which are acceptable to verify a person's name and address vary from country to country. They may also be interpreted differently via the FSP.

Some respondents raised the case of FSPs in Somalia requesting biometric data as a requirement for enrolling new recipients. This is despite Somalia having no KYC legislation.

Others raised potential risks of sharing data with some FSPs. For example, when delivering CVA in the Tigray region of Ethiopia it is a government requirement to work with Commercial Bank, which is owned by the government. Therefore sharing data for the purposes of a transfer is likely to mean also sharing data with government.

#### **Cost impact**

The cost impacts of not addressing this use case largely relate to the time-consuming nature of manually processing data associated with payment files. There appear to be cost savings to be gained from addressing it. The evaluation<sup>26</sup> of the Jordan CCF found that bank transfer fees reduced from 2.5–5 per cent to 1.67 per cent, and participating agencies reported reduced human resource requirements to assist beneficiaries.

## THE FUNDAMENTAL PRINCIPLES

# OF THE INTERNATIONAL RED CROSS AND RED CRESCENT MOVEMENT

#### Humanity

The International Red Cross and Red Crescent Movement, born of a desire to bring assistance without discrimination to the wounded on the battlefield, endeavours, in its international and national capacity, to prevent and alleviate human suffering wherever it may be found. Its purpose is to protect life and health and to ensure respect for the human being. It promotes mutual understanding, friendship, cooperation and lasting peace amongst all peoples.

#### **Impartiality**

It makes no discrimination as to nationality, race, religious beliefs, class or political opinions. It endeavours to relieve the suffering of individuals, being guided solely by their needs, and to give priority to the most urgent cases of distress.

#### **Neutrality**

In order to enjoy the confidence of all, the Movement may not take sides in hostilities or engage at any time in controversies of a political, racial, religious or ideological nature.

#### Independence

The Movement is independent. The National Societies, while auxiliaries in the humanitarian services of their governments and subject to the laws of their respective countries, must always maintain their autonomy so that they may be able at all times to act in accordance with the principles of the Movement.

#### **Voluntary service**

It is a voluntary relief movement not prompted in any manner by desire for gain.

#### Unity

There can be only one Red Cross or Red Crescent Society in any one country. It must be open to all. It must carry on its humanitarian work throughout its territory.

#### Universality

The International Red Cross and Red Crescent Movement, in which all societies have equal status and share equal responsibilities and duties in helping each other, is worldwide.



#### The International Federation of Red Cross and Red Crescent Societies (IFRC)

is the world's largest humanitarian network, with 192 National Red Cross and Red Crescent Societies and around 14 million volunteers. Our volunteers are present in communities before, during and after a crisis or disaster. We work in the most hard to reach and complex settings in the world, saving lives and promoting human dignity. We support communities to become stronger and more resilient places where people can live safe and healthy lives, and have opportunities to thrive.