DIGITIZING WORKER SALARY PAYMENTS:

A Manual for Ready-made Garment Factories

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About HERproject: BSR's HERproject is a collaborative initiative that strives to empower low-income women working in global supply chains. Bringing together global brands, their suppliers, and local NGOs, HERproject drives impact for women and business via workplace-based interventions on health (HERhealth), financial inclusion (HERfinance), and gender equality (HERrespect).

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The author hopes that this manual will be useful to any RMG factories in Bangladesh with a similar interest in using mobile financial services to digitize workers' salary payments.

I

OVERVIEW OF THE CURRENT STATE OF MOBILE FINANCIAL SERVICES (MFS) REGULATIONS

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The Central Bank of Bangladesh (Bangladesh Bank) issued guidelines on MFS for banks on September 22, 2011. These were subsequently amended on December 20, 2011. The guidelines allow only for bank-led deployments of MFS and all MFS providers have to comply with the regulation if they wanted to continue to offer MFS. A more detailed explanation of the current MFS guidelines as they relate to factory workers is provided below.

A. Delivery Model: According to the MFS guidelines from Bangladesh Bank, the country's central bank, only banks or their subsidiaries are allowed to offer MFS in Bangladesh. All customer mobile banking accounts must be held with a bank and accessible through customers' mobile devices. The mobile account can only be a non-cheque, limited-purpose account. Bangladesh Bank has very clearly stated that mobile network operators (MNOs) can only partner with banks as agents in order to provide their distribution channels and service access channels like Unstructured Supplementary Service Data (USSD), although they are not allowed to offer a full range of MFS independently.

B. KYC/AML Requirements: MFS providers have to ensure completion and authenticity of all required documents per the Know Your Customer (KYC) requirements in the KYC Profile Form prescribed by Bangladesh Bank (refer to Annex 1 in the MFS guidelines).

C. Transaction Limits and Pricing: According to Bangladesh Bank Circular No.: 01/2017, transaction limits are set as follows:

PARTICULARS		CASH-IN TO CUSTOMER ACCOUNT	CASH-OUT FROM CUSTOMER ACCOUNT	SEND MONEY (P2P) (CUSTOMER ACCOUNT TO CUSTOMER ACCOUNT)	CASH-IN TO AGENT ACCOUNT
Transaction Limits (Value of Transaction)	Max. Value/transaction	Tk.15,000	Tk.10,000*	Tk.10,000	Not defined
	Max. Value/day	Tk.15,000	Tk.10,000*	Tk.10,000	Not defined
	Max. Value/month	Tk.1,00,000	Tk. 50,000	Tk.25,000	Not defined
Transaction Frequency (No. of Transactions)	Max. No. of Transactions/day	2	2	Not defined	5
	Max. No. of Transactions/month	20	10	Not defined	150

The above limits only cover person-to-person (P2P) transactions, and do not cover transactions from individuals to/from businesses (P2B and B2P) or the government (G2P and P2G). Agents are not allowed to use their own agent account to perform cash-in or P2P transactions with other agents. Pricing is totally dependent on MFS providers, which can set them at their own discretion.

D. Transaction Security: All MFS transactions must be authenticated by the account holders using their respective personal identification number (PIN) or similar other secured mechanism.

E. Complaints and Grievances: There is no separate consumer protection policy for MFS, although the MFS guidelines have made MFS providers responsible for managing risks and handling customer grievances.

F. Transaction Settlement: MFS providers are considered the custodian of deposits for individual customers. At any point in time, the relevant balance in the bank's books must equal the virtual balance of all registered mobile accounts shown in their system.

G. Selection of Agents: MFS providers are responsible to select, appoint, equip, train and monitor their agents. Institutions that have existing agent networks such as nongovernment organizations (NGOs), microfinance institutes (MFIs), MNOs, government or postal departments can become partner agents on behalf of banks.

You can read the current guidelines in full here. It should also be noted that Bangladesh Bank issued draft revised guidelines in July 2015. The revised guidelines have not yet been implemented and it is unclear if and when they will be, and in what form the final revised guidelines will take.

H. Allowable Services: The following services are currently allowed to be offered by MFS providers:

- Disbursement of inward foreign remittances
- Cash-in/cash-out using mobile account through agents, bank branches, ATMs, MNO outlets
- Person-to-Business Payments—e.g., utility bill payments, merchant payments
- Business-to-Person Payments—e.g., salary disbursement, dividend and refund warrant payments, vendor payment
- Government-to-Person Payments—e.g., elderly allowances, freedom fighter allowances, subsidies
- Person-to-Government Payments—e.g., tax, levy payments
- Person-to-Person Payments—one registered mobile account to another registered mobile account
- Other payments—e.g., microfinance, overdrawn facility, insurance premium, DPS

MFS providers are not allowed to offer any credit services but MFS can be used as a channel to disburse and collect loans.

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FACTORY COMPLIANCE, OPERATIONS, AND ISSUES RELATING TO PAYMENTS

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It is very important to simultaneously understand the garment factories' working environment, norms & cultures, compliance requirements, and other relevant issues before planning to introduce mobile payments to factory workers. Here are some of the things to consider.

A. Pay Slips: Factories usually issue pay slips and take signatures from each worker, because factories need confirmation from workers that they are receiving the exact wages they are entitled to. Though it is not mandatory by law for them to take signed copies, factories have long been practicing this for different reasons. Banks often ask for those signed pay slips from the factories as a part of their payment compliance, as well as to determine whether workers are being forced to work overtime.

B. Payment Notification: Salaries are usually paid to workers in cash and, therefore, there is no actual record of payment except taking signed pay slips from workers. Both factories and workers require payment notification or necessary documentation on whether the payment was successfully executed. Accordingly, the signed copies of pay slips are used as the payment notification for both parties.

C. Mobile Phone at Workplace: In current practice, factories usually do not allow workers to bring mobile phones with them onto the factory floor.

D. Immediate Access to Cash: In Bangladesh, most garment workers receive their salary in cash. It seems they are comfortable with this process because it gives them immediate access to their pay. Changes to this process may face opposition from some workers.

Photo credit: BSR

3

CHALLENGES RELATED TO MFS ADOPTION

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Since the launch of MFS in Bangladesh in 2011, significant growth has been observed across all metrics, from account use to transaction values. At the same time, there are a number of challenges that the MFS industry is experiencing that might be slowing down the potential of MFS to positively impact overall financial inclusion. These challenges are as follows:

A. Over-the-Counter (OTC) versus Mobile Money Usage: According to the 2015 InterMedia FII Bangladesh Wave Report,[1] about 33 percent adults have access to MFS but only 9 percent have account ownership because customers are mostly OTC users. This is due to the lack of understanding on the difference between having an MFS account and making an OTC transaction. As a result of this, there is no actual identification of those customers who are sending and receiving funds via OTC. MFS providers have yet to come up with innovative products or services that can make MFS a daily need for the customers.

B. Awareness versus Understanding: Awareness of MFS among adults is very high (92 percent), but only one-third of those are using MFS.[2] "Using a MFS account is difficult" is the second most important reason of why adults are not signing up for MFS.

C. Mobile Phone Ownership and Technology Limitations: It is estimated that more than 90 percent of Bangladeshi adults have access to a mobile phone, although only around 64 percent are actually phone owners.[1] Despite significant access, mobile phone usage is still fairly basic among most Bangladeshis. Only around a quarter (26 percent) have reported using a phone for advanced functions, such as using the internet or sending picture messages.[2] Furthermore, only 30 percent of adults have reported being able to send an SMS.[3] Considering the fact that the most-used service access channel by the MFS providers is USSD and that most menus are in English, this represents a real barrier to increasing MFS adoption.

1 http://finclusion.org/uploads/file/reports/2015 InterMedia FII BANGLADESH Wave Report.pdf
2 http://finclusion.org/reports/#bangladesh
3 http://www.cgap.org/blog/digital-finance-bangladesh-where-are-all-women

D. Limited Competition in MFS: Bangladesh Bank has issued 29 MFS licenses to banks, although only two providers (bKash and ROCKET) have greater than double-digit market share.[4] While some of the smaller providers are attempting to drive innovation, such as through the introduction of Deposit Pension Scheme (DPS) accounts, they are impeded by lower investment and limited penetration. The success of the main player, bKash, as a domestic remittance service, has also contributed to the perception among some Bangladeshis that MFS can only be used for P2P transfers, and not for other functions such as savings or bill pay.

E. Security: Although MFS as a channel is generally more secure than cash, Bangladesh has recently seen a string of high-profile thefts perpetrated against customers, agents, and distributors.[5] Increasing security of accounts and of agent networks is likely a high priority for MFS providers, but as long as incidents continue to occur, they may negatively impact consumer confidence in MFS.

In addition to the ecosystem-wide challenges mentioned above, there are also some operational challenges or risks that factories might face while using MFS to digitize workers' payments. The most likely challenges, along with mitigation strategies for each are included in the table below.

CHALLENGE	DETAILS	MITIGATION STRATEGY
User Adoption	Most workers are unlikely to already have an MFS account, and some may not even own a mobile phone. Given this and their comfort with cash, they may be resistant to change.	Proper awareness program among workers, including all of the benefits of MFS beyond just P2P transfers.
Liquidity at Agent Points	Agents may be unwilling to perform a transaction because of liquidity management concerns, or agents may wish to conserve cash by only servicing large transactions.	Ensure that the service providers used by factories agree to ensure cash liquidity at agent points nearby factories.
Agent Point Availability	Insufficient numbers/availability of MFS and/or bank correspondent agents in a given geography can result in consumers not being able to access cash or incurring extra travel costs and inconvenience.	Encourage factories to ask any MFS providers for a list of agent points near their factory and residential areas where their workers live before entering into a service agreement.
Transactions to Wrong MFS Account	Factories may unintentionally send a transaction advice sheet to the service provider with incorrect information, such as the wrong MFS account numbers of workers or MFS account numbers of former workers.	Strong maker and checker processes should be implemented at factories to ensure avoiding such unintentional errors.

4 For recent examples, see http://bdnews24.com/bangladesh/2016/05/23/biometrically-registered-robi-sims-used-in-fraud-money-stolen-from-bkash-accounts-chittagong-police and http://print.thefinancialexpress-bd.com/2014/12/12/70594/print
5 http://finclusion.org/reports/#bangladesh

CHALLENGE	DETAILS	MITIGATION STRATEGY
Customer Support	When issues occur, workers may not know who to reach out to for a solution or the support mechanism is not in place or is not accessible.	Ensure that service providers selected by factories have adequate and fully functional support services to handle customer queries, and that workers are aware of how to access that customer support.
Forgetting PIN	Workers may forget their PIN or forget how to properly enter it, resulting in account suspension from too many incorrect attempts.	Proper training and awareness program among workers on PIN management is crucial.

For some of the additional challenges that might be faced, along with mitigation approaches, refer to the Tipsheet developed by FHI 360 on *"Potential Issues and Mitigation Approaches"*.[6] Although it was originally developed for United States Agency for International Development (USAID) implementing partners to promote increased access to and usage of MFS in agriculture and health projects, much of it might also be useful in this context.

6 https://www.microlinks.org/library/mobile-money-tipsheet-potential-issues-and-mitigation-approaches

4

POTENTIAL BENEFITS OF MFS FOR WORKERS

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POTENTIAL BENEFITS OF MFS FOR WORKERS

MFS itself has many benefits and using it as a channel for access to different formal financial services can ensure true financial inclusion for the large unbanked RMG workers' community. Many innovative services can be offered through the MFS channel and also can be linked to other services that are not directly possible to offer via MFS. Some of those potential services are as follows:

A. Savings with accessible installment amounts. MYCash and IFIC Mobile Banking are offering similar types of service targeting their customers.

B. Mobile-based micro-credit for MFS users. Very recently, through the USAID mSTAR project, FHI 360 helped IFIC Bank to launch a first-of-its-kind micro-credit product via the MFS channel for smallholder farmers, however no similar products are available yet for RMG workers.

C. Access to formal banking services by integrating MFS with core banking services. ROCKET, mCash, MYCash, Trust Bank Mobile Money, and IFIC Mobile Banking already have such integration and are offering some basic services using that channel.

D. Insurance coverage for MFS and mobile phone users. This is also hypothetical, not currently offered by any provider.

E. Utility and merchant payment options for MFS users. Most of the providers are trying to explore these options but bKash and ROCKET are giving high priority to acquiring merchants.

5

CHECKLIST FOR SELECTING AN MFS PROVIDER AND MNO PARTNER

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Choosing the right MFS provider (MFSP) to work with is crucial to the success of any activities that revolve around using mobile financial services. There are currently 19 service providers actively offering services in Bangladesh, less than half of that have any presence of note. MFSPs have different service offerings, pricing, and reach, so successfully deciding which MFSP is the right fit for the factory requires planning and research. Below are some factors to consider that might facilitate the decision-making process.

A. Organizational Need: The factory should be able to identify its needs and align them with the service that providers offer. The objectives of the factory could vary but most important point to consider is how providers are dealing with bulk payments and how efficient their request to disbursement mechanism is. Interoperability between organization's core banking account and MFS account may also be a consideration.

B. Recipient Need: Factories may strike a favorable deal with a certain service provider but it should also be taken into consideration whether that particular MFSP will benefit the workers. The workers may have underlying demands from a MFSP. These need to be identified and should be able to be addressed by the selected MFS provider.

C. Geographic Coverage: Knowing whether an MFSP has access points (that is, agents, ATMs, bank branches) near the factory and workers' residential areas is critical. If an MFSP lacks sufficient coverage in a target geography, it may not make sense to work with that MFSP, or the factory may need to consider working with multiple MFSPs.

D. Cost: Fee structures vary by providers. For instance, costs associated with account opening, cash transfers, cash-in, and cash-out may differ among providers and within providers. USAID's mSTAR's Mobile Money *Comparison Chart*[7] provides helpful overviews of fees and limits for nine of Bangladesh's MFSPs.

E. Quality of Service: Given the rapid growth of Bangladesh's MFS industry, it is important to stay informed vis-à-vis the quality of service of different providers. Check with others who are already using MFS to learn from their experiences.

7 https://www.microlinks.org/library/mobile-financial-services-comparison-chart-bangladesh

If the factory has plans to work with an MNO on SIM card distribution, there are a few points to consider before resorting to a working relationship with them. Below are some factors for prudent consideration.

A. Network Coverage: An MNO is defined by the strength of its network coverage. Thus, an MNO with a robust and dependable network setup in the geographic area where the factory is based should be an important point of consideration.

B. Airtime Agent Points: People are naturally inclined to look for more and more convenience. Thus, availability and accessibility of airtime agent points near the factory is an important point to consider.

C. Mobile SIM Card Price: Buying a SIM card is a fixed investment for the purchaser and an individual SIM is not that expensive. If one considers purchase of numerous SIM cards in bulk (for workers or staff), however, then the price of the SIM card comes into play. Providers willing to give bulk discounts on the purchase of SIM cards should be considered.

D. Call Tariffs and Value-Added Services (VAS) (optional): If the factory is buying SIM cards for workers without phones, then this is likely not a major consideration. However, if the factory wants to encourage its workers to eventually own a phone, then they may want to be mindful of the call tariffs offered by the MNO they purchase their SIM cards from. The good news is that intense competition has meant that all of the providers in Bangladesh offer competitive rates with varying packages based on usage and other considerations. All of the providers also have a wide variety of VAS to cater to their customers' diverse needs. Extensive information on the range of VAS each MNO offers is available on their websites. Thus, MNOs having suitable VAS for workers maybe be considered for collaboration.

6

REGISTRATION OF MFS ACCOUNTS AND MOBILE SIM CARDS

6

REGISTRATION OF MFS ACCOUNTS AND MOBILE SIM CARDS

Since workers might not already have a mobile SIM card, which is a prerequisite for using MFS, it is important understand the process of SIM registration. According to the law, anyone 18 years old or older can own a SIM card. The following are the requirements and processes for registering both a SIM card and an MFS account.

A. Mobile SIM Card Registration: According to the guidelines from the Bangladesh Telecommunications Regulatory Commission (BTRC),[8] the items that have to be submitted at agent points or customer care centers while purchasing a new mobile SIM card are as follows:

- Completed new subscription agreement form/registration form
- One copy of recent passport-size photograph
- Fingerprint of the applicant
- Photocopy of both sides of National ID (NID)
- If anyone does not have an NID, then he or she will be able to buy a SIM card only from any respective operator's Customer Care Center using the below alternative IDs:
  - Passport, driving license, or birth certificate (the latter option is not accepted by all operators)

Once an eligible person submits all of the required documentation, a SIM card will be activated immediately. The price of pre-paid mobile SIM cards vary by operator, but in general they cost BDT 100–200.

B. MFS Account Registration: According to the guidelines from Bangladesh Bank, customers are required to submit the following documents to open an MFS account, which can be done from an MFS agent point or service center:

- Completed customer KYC form
- One copy of recent passport-size photograph
- Photocopy of National ID/passport/driving license
- Some MFS providers allow the following alternative ID if the customer does not have any of the above identification cards:
  - Attested copy of the chairman certificate or birth certificate, along with an attached photo of the applicant

It usually takes 3 to 10 days to activate any newly registered MFS account, depending on the MFS provider. Mostly MFS providers offer account registration free of cost; providers may impose minimum opening balances on the account, though most do not.

8 https://www.banglalink.net/en/home/faq

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CHANGES REQUIRED TO ACCELERATE MFS ADOPTION

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Although the Bangladeshi MFS industry has been enjoying outstanding growth within only a few short years, there are still a number of actions that can be taken to overcome the remaining barriers and to foster greater growth in this industry. Some of those are highlighted below.

A. Innovative Product/Service Offerings: The Bangladesh MFS industry is still in the early stages of development and has mostly focused on domestic remittances (that is, money transfer services). The MFS market needs innovative services to increase the active customer base, which might include the introduction of various savings schemes, mobile-based micro-credit, insurance coverage, mobile ticketing, merchant payments, instant access to international foreign remittance, and others.

B. Development of Payment Ecosystem: The continued development of a payment ecosystem within Bangladesh is very important for adoption and usage of MFS. The expanded rollout of payment services especially in rural settings, including bills, school fees, and merchant purchases, is important to driving further uptake of MFS and reducing OTC usage.

C. Service Differentiation and Dynamic Pricing: General cash-out and salary withdrawal should not be the same service and the pricing should be differentiated. Since there are fewer individuals making salary withdrawals via MFS than general cash-out, providers may want to think about offering reduced service fees, such as for salary withdrawal.

D. Addressing Gender Differences: According to the 2015 InterMedia FII Bangladesh Wave Report, men enjoyed three times the growth in financial inclusion that women did between 2014 and 2015.[9] Moreover, only 3 percent or less of the agents are women in Bangladesh.[10] Both of these show significant gaps that still exist in terms of women's access to and usage of appropriate MFS.

E. Exploring G2P Payment Market: The government makes regular payments to individuals at the base of the pyramid through its social safety net programs.[11] The beneficiaries usually include the elderly, disabled, widowed, freedom fighters, and others. The payments have been typically cash payments and, therefore, special attention is required to bring them within formal financial channels.

9 http://finclusion.org/reports/#bangladesh
10 http://www.cgap.org/blog/digital-finance-bangladesh-where-are-all-women
11 http://www.mof.gov.bd/en/budget/14_15/safety_net/safety_net_en.pdf

F. MFS Access through Local Languages: Because a large majority of Bangladeshis cannot read or even speak English, the development of USSD menu in Bangla is crucial. Even this, however, might not be sufficient, because more than 38 percent of Bangladeshi adults are illiterate in Bangla as well.[12] Providers can consider offering interactive voice response (IVR) menus that customers can use to access their account; Bangla, voice, and visual icons can be offered using mobile apps.

G. Simplified and Tiered KYCs: Allowing for a tiered KYC system, whereby low-value accounts require less documentation than higher value accounts, could help to encourage the opening of MFS accounts, particularly at the base of the pyramid.

H. Instant Access to Account: It might promote account opening and reduce consumer reliance on OTCs if permission could be given for small transactions to be made immediately after an account is opened, but before it is activated, instead of having to wait up to a week before any transactions can be made.

12 https://www.cia.gov/library/publications/the-world-factbook/geos/bg.html

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