

# DFS Security recommendations for regulators and providers

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November 2024



# DFS Security Recommendations

1. [Security recommendations to protect against DFS SIM related risks like SIM swap fraud and SIM recycling](#)
2. [Recommendations to mitigate SS7 vulnerabilities](#)
3. [Template for a Model MOU between a Telecommunications Regulator and Central Bank related to DFS Security](#)
4. [Mobile Application Security Best practices](#)
5. [DFS Consumer Competency Framework](#)

# DFS Consumer Competence Framework

Related report:  
[Security testing for USSD and STK based DFS applications](#)

# Objectives

- 1. Digital Transaction Engagement:** Enable consumers to confidently engage in financial transactions using digital channels.
- 2. Informed Decision-Making:** Empower consumers to make informed choices and thoroughly understand pricing, terms, and conditions.
- 3. Safety and Fraud Avoidance:** Equip consumers to operate safely, circumventing fraudulent or deceptive marketing practices.

# Objectives

4. **Data Privacy Comprehension:** Ensure consumers understand the risks of failing to protect data privacy within digital financial services.
5. **Grievance Redress Mechanisms:** Guide consumers to effectively engage with grievance redress and recourse mechanisms in case of discrepancies.
6. **Competencies for Vulnerable Populations:** Identify and build necessary skills for vulnerable groups (e.g., women, youth, elderly, disabled) to facilitate informed, safe, and confident use of DFS.
7. **DFS Competencies for Disabled Individuals:** Pinpoint and develop specific skills that people with disabilities require for optimal use of DFS.

# 3 phases

## 1. Pre-transaction Phase

- When the consumer is contemplating the use of DFS services.
- **Important Skills/Knowledge:** Understanding of service offerings, pricing, and benefits; comparison of providers.

## 2. Transaction Phase

- Engaging with the service provider and using or purchasing the financial service.
- **Important Skills/Knowledge:** Understanding of the transaction process; knowledge of potential risks and safeguards

## 3. Post-transaction Phase

- Includes engagement with the provider for quality assurance or redress when the Quality of Service (QoS) was not up to standards.
- **Important Skills/Knowledge:** Understanding of rights and obligations; ability to seek redress.

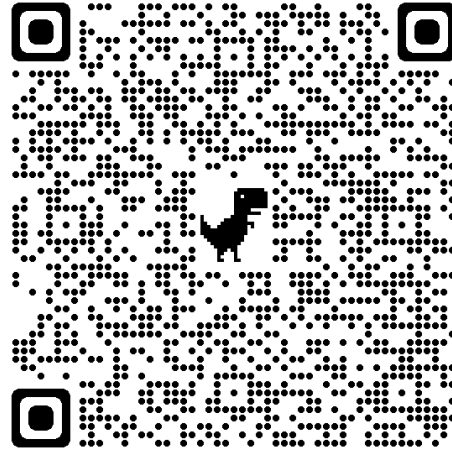
# DFS CCF encompasses 15 core competences

DFS transaction Phase	Competences
Pre-transaction (CA1)	<p>CA 1.1 Search for information about costs, quality and terms of conditions of the service.</p> <p>CA 1.2 Compare information on costs, quality and terms of conditions of the service.</p> <p>CA 1.3 Evaluate the commercial information provided and suitability for purpose.</p> <p>CA 1.4 Manage digital identity and credit profile.</p> <p>CA 1.5 Understand how to access digital financial service in a secure manner.</p> <p>CA 1.6 Understand what is personal data and the related risks to personal data.</p>
Transaction (CA2)	<p>CA 2.1 Understand how an electronic payment is initiated using digital channels<sup>15</sup> and the conditions for the transactions to be completed (i.e. receiver receives payment).</p> <p>CA 2.2 Make payments and accessing finance through digital channels.</p> <p>CA 2.3 Understand the terms and conditions of the DFS provider, including related costs and risks.</p> <p>CA 2.4 Manage personal data and privacy.</p> <p>CA 2.5 Protect health and safety.</p>
Post-transaction (CA3)	<p>CA 3.1 Share information with the service providers (i.e. feedback) and other consumers online.</p> <p>CA 3.2 Know consumer rights and how to obtain redress.</p> <p>CA 3.3 Know the responsible regulator to approach with intractable problems and the mechanism for doing so.</p> <p>CA 3.4 Keep up to date on developments in digital financial services.</p>

# Knowledge, skills and proactive step

1.1 Search for information about cost, quality and terms of conditions of the service	
To search for and access information related to digital finance. To know where to obtain the information needed regarding the various cost (direct and indirect) options for a DFS provider service and the terms and conditions of the service.	
Knowledge area	<p>CA1.1-K1 Recognize that consumers should understand the exact costs (both direct and indirect) and evaluate affordability for using the service if they want to bear these costs before engaging in the transaction. [For gender sensitivity: Include also information about the relevance of the digital financial inclusion service product].</p> <p>CA1.1-K2 Understand that they need to read, watch, listen and comprehend the DFS provider terms and conditions, including steps to use before accepting to use the service.</p> <p>CA 1.1-K3 Differentiate the selected product from similar products.</p> <p>CA 1.1-K4 Understand the audio or visual medium used for advertising the product or service.</p>
Skills area	<p>CA1.1-S1 Know how to identify the costs for using the service.</p> <p>CA1.1-S2 Know whether the terms and conditions stated are fair to consumers and legislation in place.</p> <p>CA 1.1-S3 Know how to compute the cost of the service.</p> <p>CA 1.1-S4 [For gender sensitivity: Know the range of financial products and services women can access from the DFS provider].</p>
Proactive steps	<p>CA1.1-P1 Search for information about the costs for the service in the appropriate locations.</p> <p>CA1.1-P2 If unsure, contact the DFS provider consumer information contact to obtain relevant information or if necessary, the appropriate regulator.</p> <p>CA1.1-P3 Contact other users of the DFS service to confirm the cost and terms of conditions.</p> <p>CA1.1-P4 Take advice from consumer advocacy organizations about costs, terms and conditions and service provision of service provider.</p> <p>CA1.1-P5 Searching and analysing different DFS options and comparing them with available savings and desired objective to be met by DFS service providers.</p>





<http://www.itu.int/go/dfssl>

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**Thank you!**