



Mobile Money Service Certification

Policy and Processes

Version 3.0
November
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Revision History

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2017-11-17	0.6	Available on GSMA Mobile Money Certification Website
2017-12-22	0.8	Available on GSMA Mobile Money Certification Website
2018-03-21	1.0	Minor clarifications from pilot; Updated process to make MMP Account Request the first step.
2019-10-28	1.1	Minor changes to Certification Program Processes and Auditing processes. Added two sections: Denial of Certification and Certification Management
2020-02-06	1.2	Addition of Complaints Policy Procedure
2021-01-06	2.0	Major modification to Certification process.
2021-11-30	2.1	Added clarification language to the renewal process.
2024-11-08	3.0	Minor changes: removal of previous Scheme Operator details

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1. Introduction

This document defines the policies that govern GSMA Mobile Money Certification.

The Scheme Operator acts as the Certification entity for all approvals related to the Mobile Money Certification Scheme.

The policies and processes contained herein are the requirements and operational rules that guide the process, and ongoing operation of the Mobile Money Certification Program, and dictates the framework from within which the Certification Scheme will operate.

1.1. Audience

The audience of this document is the Mobile Money Providers (MMPs) seeking Mobile Money Certification, Accredited Assessors completing the Certification Assessments, Accredited Consultants supporting MMPs, and the Mobile Money Certification Secretariat (MMC Secretariat).

1.2. Policies

1.2.1. Key Policies

- Instructions:
 - MMPs **SHALL** follow the policy and processes outlined in this document to gain Mobile Money Certification.
- Secure document handling:
 - All documentation will be transmitted and stored securely.
 - Documentation will be held private and only used for the purpose of assessment.
- Assessment:
 - 100% of indicators must be fully compliant.
 - The Assessor will make decision on compliance based on evidence presented by the MMP, both Online and Virtual.
 - The Scheme Operator will check and oversee the assessors and is the final arbiter.

- Retests:
 - Reassessments will verify only the originally non-compliant criteria.
 - Reassessments are permitted within six months if the first certification is failed.
 - The MMP's first certification will not be awarded until the retest is passed.
- Validity of certification is three years

1.2.2. Policy Key Words

The key words "MUST", "MUST NOT", "REQUIRED", "SHALL", "SHALL NOT", "SHOULD", "SHOULD NOT", "RECOMMENDED", "NOT RECOMMENDED", "MAY", and "OPTIONAL" in this document are to be interpreted as described in [RFC 2119](#).

In summary:

- "MUST", "REQUIRED", or "SHALL", mean that the definition is an absolute requirement of this document.
- "MUST NOT", or "SHALL NOT", mean that the definition is an absolute prohibition of this document.
- "SHOULD", or "RECOMMENDED", mean that there may exist valid reasons in particular circumstances to ignore a particular item, but the full implications must be understood and carefully weighed before choosing a different course.
- "SHOULD NOT", or "NOT RECOMMENDED" mean that there may exist valid reasons in particular circumstances when the particular behaviour is acceptable or even useful, but the full implications should be understood, and the case carefully weighed before implementing any behaviour described with this label.
- "MAY", or "OPTIONAL", mean that an item is truly optional.

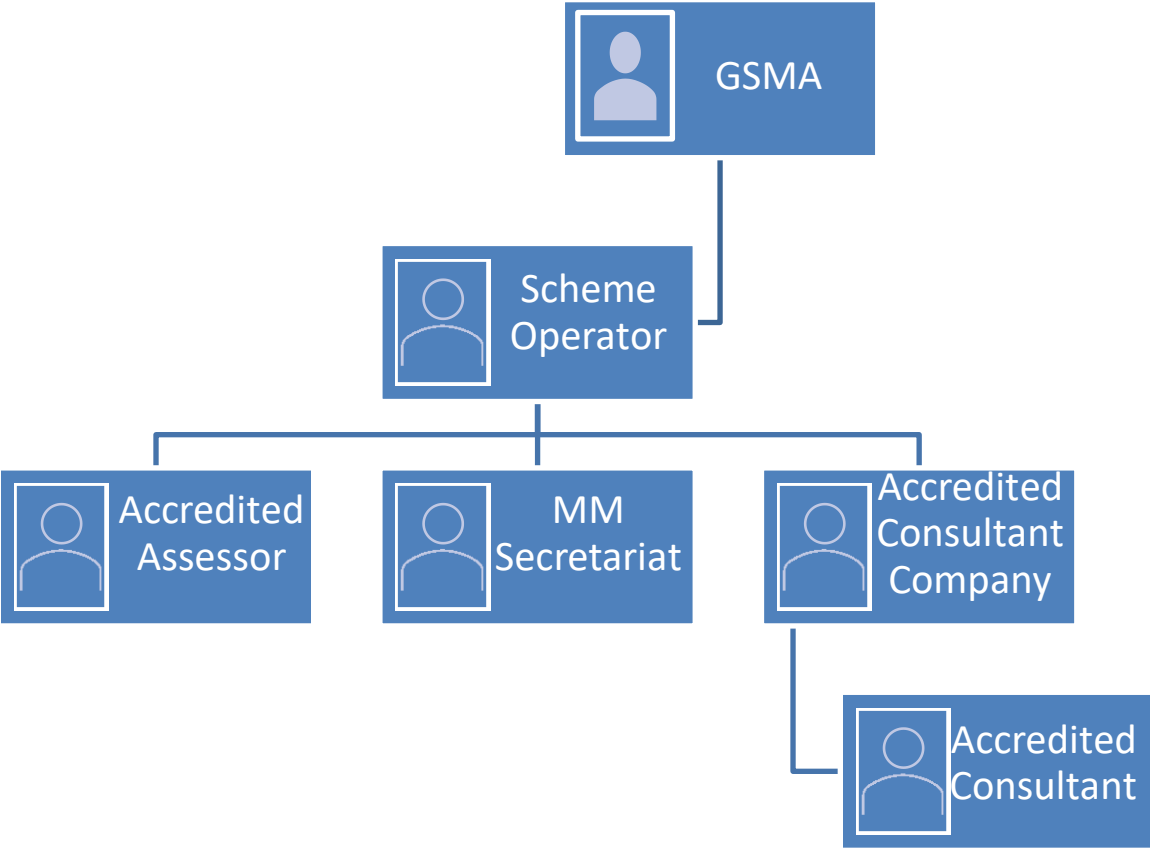
The text formatting indicated above is applied throughout this document to highlight the key words for this policy.

1.3. Support

For help and support, contact the Mobile Money Certification Secretariat at kenya@certi-trust.com.

2. Roles & Responsibilities

Figure 1: Roles & Responsibilities Organization Chart



2.1. GSMA

The GSM Association (GSMA) represents the interests of Mobile Network Operators (MNOs) worldwide. Responsible for creating the original Mobile Money Code of Conduct back in 2014, the GSMA has created the Mobile Money Certification Scheme. GSMA owns and maintains the compliance criteria to ensure they best represent industry needs. GSMA has appointed a Scheme Operator to run the Certification Scheme.

2.2. Scheme Operator

The Scheme Operator is the entity responsible for managing the Mobile Money Certification Scheme on behalf of GSMA.

2.3. Mobile Money Certification Secretariat (MMC Secretariat)

The Mobile Money Certification Secretariat (MMC Secretariat) is the individual or team overseeing the operation of the Mobile Money Certification Scheme on behalf of the Scheme Operator.

2.4. Mobile Money Provider (MMP)

The Mobile Money Provider (MMP) is the organization that will be offering a mobile money service¹ that enables users to add funds, transfer money, pay bills, and / or purchase merchandise using an account on their mobile phone.

2.5. Accredited Assessor

The entity responsible for evaluating that a MMP meets the requirements for Mobile Money Service Certification, per the indicators in the Code of Conduct toolkit. Assessors **MUST** be Accredited according to the Mobile Money Assessor Accreditation Policies and Processes.

2.6. Mobile Money Certification Auditor

The entity responsible for evaluating that the Assessors evaluation of the Mobile Money Providers Self-Assessment meets the requirements for Mobile Money Service Certification, per the indicators in the Code of Conduct toolkit, and renders the Final Assessment Report.

¹ In the context of the GSMA Mobile Money Certification, a service is considered a mobile

money service if it meets all of the following criteria:

1. The service includes transferring money and making payments using the mobile phone.
2. The service must be available to the unbanked, e.g. people who do not have access to a formal account at a financial institution.
3. The service must offer at least one of the following products:
 - a) Domestic or international transfer;
 - b) Mobile payment, including bill payment, bulk disbursement, and merchant payment;
 - c) Storage of value.
4. The service must offer a network of physical transactional points outside bank branches and ATMs that make the service widely accessible to everyone.

This means that mobile banking services that offer the mobile phone as just another channel to access a traditional banking product are not considered mobile money services and cannot become certified.

2.7. Accredited Consultant

An individual who **MAY** be contracted by MMPs to provide support and help them prepare for the Certification. Consultants **MUST** be Accredited according to the Mobile Money Consultant Accreditation Policy and Processes.

3. Mobile Money Certification Scheme Documents

This section outlines and defines the documents that govern the Mobile Money Certification Scheme.

Links to the latest versions of the documents can be found on the Certification [Scheme Documents](#) page of the Mobile Money Certification Website, [MMC Website](#).

3.1. Policy and Process Documents

The Policy documents outline the requirements for Mobile Money Certification.

Table 1: Policy Documents

Document Name	Description
Mobile Money Service Certification Policy and Procedures	Policies and procedures for Mobile Money Service Certification (this document).
Mobile Money Consultant Accreditation Policy and Procedures	Policies and procedures for Mobile Money Consultant Accreditation.

3.2. MMP Documents

Documents used by the MMP during the Certification process.

Table 2: MMP Documents

Document Name	Description
Accredited Consultant List	List of Accredited Consultants that a MMP can use to aid in the Certification Process. Use of an Accredited Consultant is OPTIONAL, but if a Consultant is used, they MUST be an Accredited Consultant from this list.
Application	Application completed by the MMP to begin the Certification process.
Certification Request	Request completed by the MMP when all Certification requirements have been met to initiate Certificate Issuance.

Certification Toolkit	Defines practices that MMPs should follow to ensure that their service is sound, the mobile network channel is secure, and that customer funds and information are securely maintained. The toolkit specifies criteria and evidence requirements for the Certification Assessment.
Dispute Resolution Request	Request completed by the MMP if there is a Dispute during the Certification process.
MMP Certification Assessment Agreement	Legal Agreement to be signed by the MMP and cross-signed by the Scheme Operator to start Certification.
Renewal Notice	Notice completed by the MMP to declare their intention to renew their Certificate and start the Renewal process.
Trademark Licensing Agreement (TMLA)	TMLA to be signed by the MMP and cross-signed by the Scheme Operator in order to use the Mobile Money Certified Logo.

3.3. Accredited Assessor Documents

Documents used by the Accredited Assessor during the Certification process.

Table 3: Accredited Assessor Documents

Document Name	Description
Assessment Report	Report prepared by the Assessor detailing the findings of the Assessment. The same Assessment Report is used for an Assessment, Reassessment, and Renewal Assessments.
Reassessment Report	Report prepared by the Assessor detailing the findings of the evaluation of the Reassessment List.

3.4. Auditor Documents

Documents used by the Auditor during the Certification process.

Table 3: Accredited Assessor Documents

Document Name	Description
Final Assessment Report	Final Report prepared by the Auditor detailing the findings of the Assessment review. The same Assessment Report is used for an Assessment, Reassessment, and Renewal Assessments.
Final Reassessment Report	Final Report prepared by the Assessor detailing the findings of the evaluation of the Reassessment List.

3.5. Submitting Documents

All documentation provided to the Scheme Operator and MMC Secretariat as part of the Mobile Money Certification process **MUST** be submitted through the MMC Website by the forms provided for this purpose.

3.5.1. Document Storage

All documents and information submitted through the MMC Website is stored within an encrypted database only accessible by the MMC Secretariat and will not be shared.

Unless a previous agreement has been made between the MMC Secretariat and the MMP, Accredited Assessor, or Accredited Consultant, all documentation sent via email will not be reviewed and will be deleted.

3.5.2. Language

Documents provided to the Accredited Assessor **SHALL** be in English, French, or Spanish, as appropriate, subject to agreement with the Accredited Assessor that the Assessment can be

performed with documents in that language. The Scheme Operator will only accept documents in English, if support documents are requested by the MMC Secretariat during their evaluation of the Certification, the MMP and the Accredited Assessor **MUST** provide versions in English.

4. Certification

The following sections provide a description of the Service Certification process.

4.1. Process Overview

The initial Certification process is five (5) steps, as outlined below.

Each step **MUST** be completed in its entirety before moving on to the subsequent step.

1. Preparation
2. Application & Documentation
3. Certification Assessment
 - Online Assessment
 - Virtual Assessment
4. Assessment Report
5. Certification Issuance

4.1.1. Step-by-Step Process

The step-by-step process with the basic descriptions of each step is included in Table 4 below, a more detailed account of each step is in the following sub-sections.

Table 4: Initial Certification Steps

Process Step	Responsible Party	Description
Preparation	MMP	Completes an Account Request on the MMC Website to access the MMP Dashboard
	MMP	Reviews the Mobile Money Certification Scheme documentation. Downloads the Certification Toolkit from the MMP Dashboard page and conducts a detailed self-assessment against the criteria. If during the course of this Self-Assessment the MMP determines that it is out of compliance, it should implement remedies before proceeding to the next stage. The MMP <i>MAY</i> (at its option) consider hiring an Accredited Consultant from the Accredited Consultant List to get support during the preparation phase.
	MMC Secretariat	Issues credentials to the MMP for access to the MMP Dashboard.
	MMP	Signs the online Mobile Money Provider Certification Assessment Agreement and submits to the MMC Secretariat.
	MMC Secretariat	Reviews and cross-signs the Agreement and returns it to the MMP and issues an invoice to the MMP for the assessment fees.
	MMP	Submits assessment fees to the MMC Secretariat and schedules the assessment to begin.
	Certification Assessment: Online Assessment	MMP

	Accredited Assessor	Evaluates the indicators in the Certification Toolkit and any other documents shared by the MMP to determine it meets the criteria.
Certification Assessment: Virtual Assessment	Accredited Assessor	Reviews any additional documentation, conducts necessary interviews, and reviews policy processes with the MMP in a virtual setting. The Accredited Assessor Evaluates the Certification Toolkit for the portions that are required. *Note: the MMP may have the option of an Onsite Assessment, however; if this option is selected, the MMP will be charged additional fees for the Onsite Assessment, as identified in the MMP Agreement Section 3.2 and 3.4.
Assessment Report	Accredited Assessor	Submits the Assessment Report through the online dashboard to the MMC Secretariat (using the Accredited Assessor Dashboard).
	MMC Secretariat	Reviews the Assessment Report, with a decision to Approve, Reject, or Request more information.
	MMP	Submits a Certification Request (available on the MMP Dashboard).
	MMC Secretariat	Reviews Certification Request, and Approves, Rejects, or requests more information.
Certificate Issuance	MMC Secretariat	If approved, and all fees have been paid, issues a Certificate to the MMP.
	MMP	(OPTIONAL) Completes the TMLA for usage of the Mobile Money Certified Logo and submits to the MMC Secretariat (using the MMP Dashboard).
	MMC Secretariat	If TMLA is submitted, cross-signs and returns the TMLA to the MMP and send the logo suite to the MMP.

4.2. Preparation

An MMP seeking certification should first review the Mobile Money Certification Policy & Processes (this document), submit a request for a MMP Account on the [MMC Website](#) to access the [MMP Dashboard](#), download the Certification Toolkit from the MMP Dashboard and conduct a detailed self-assessment (available on the [Certification Scheme Documents – Mobile Money Certification](#) page).

Optionally, the MMP MAY select an Accredited Consultant to help guide them through the Certification process and provide support through the preparation phase. The Accredited Consultant **MUST** be chosen from the [Accredited Consultant List](#). The MMP **SHALL** coordinate contractual agreements and assessment fees for the Accredited Consultant (if used) of choice.

4.3. Application

The MMP **SHALL** register an intent to seek certification with the MMC Secretariat by submitting the Certification Application (available on the MMP Dashboard). This Application includes any other information **REQUIRED** for the MMC Secretariat throughout the Certification process. If an Accredited Consultant will be used, the MMP **SHALL** also declare the name of the Accredited Consultant in the Application.

Upon receiving the MMP's Application, the MMC Secretariat **SHALL** evaluate the request. If the request is deemed ineligible, the MMP will receive notification that it has been rejected; otherwise, the MMC Secretariat will notify the MMP that the certification process **MAY** move forward.

If the Application is Approved, the MMC Secretariat **SHALL** issue an Initial Invoice for the Certification that **MUST** be paid to the Scheme Operator prior to starting the Certification Assessment.

4.4. Certification Assessment

Once the MMP's Application is Approved, and the Initial Invoice is paid, the MMC Secretariat will coordinate the Assessment to begin with an Accredited Assessor. All Assessment documentation will be shared via the online dashboard of the MMP. The Accredited Assessor will begin evaluating the MMP's compliance to the principles in the CoC Toolkit.

The Certification Assessment step is split into two parts, the Online Assessment, and the

Virtual Assessment. The Online Assessment can be completed as documentation is submitted through the online dashboard. The Virtual Assessment can be completed once the Accredited Assessor has completed the Online Assessment. The Certification Assessment step is complete when the Accredited Assessor has performed both the Online and Virtual Assessment.

Accredited Assessors **SHALL** conduct the Assessment through document reviews, interviews, observations, and testing. At any point during the Certification Assessment, the Accredited Assessor **MAY** consult the MMP for clarification to information or to provide supplemental information **REQUIRED** to complete the Assessment. This **MAY** include additional Online Assessment work after the Virtual Assessment is complete.

4.4.1. Online Assessment

After receiving permission to begin certification from the MMC Secretariat, the MMP **SHALL** prepare the Certification documentation for the Accredited Assessor.

The MMP **SHALL** upload documentation to the MMPs online dashboard by indicator. The MMP **SHALL** complete each indicator with supporting documentation, indicate location in document where the indicator is met, and provide rationale comments to support their compliance with the indicator. This process **SHALL** be completed for all MMC Required Indicators.

After receiving the documentation from the MMP, the Accredited Assessor **SHALL** review the documentation that has been provided by the MMP to evaluate the indicators in the Certification Toolkit as the Online Assessment.

MMPs should note that it is recommended to provide 100% of evidence shared through the online dashboard. If the MMP deems that this is not possible, then certain documentation for indicators can be shared during the Virtual Assessment portion of the Assessment.

4.4.2. Virtual Assessment

As part of the review of the Code of Conduct Toolkit, the Assessor will verify the MMP provided references during the Virtual Assessment. The Virtual Assessment **MAY** include interviews and process step verifications. The Virtual Assessment **SHALL** also review any evidence that the MMP determined was too sensitive to share ahead of time as part of the Online Assessment [Section 4.4.1].

Note: the MMP may have the option of an Onsite Assessment, however; if this option is selected, the MMP will be charged additional fees for the Onsite Assessment, as identified in the MMP Agreement Section 3.2 and 3.4.

4.4.3. Reassessment

A Reassessment WILL be **REQUIRED** if non-compliance is found, or if the Assessment cannot be completed in full by the Accredited Assessor at the time of the Assessment. Any items that the Assessor determines cannot be evaluated or determines to be non-compliant will be flagged on the online dashboard of the MMP and will be the basis of the Reassessment.

The MMP will be **REQUIRED** to address the issues indicated in on their online dashboard prior to the Reassessment.

The Accredited Assessor **MUST** conduct the reassessment within six (6) months of the issuance of the initial certification in order to maintain an Active certification status. The MMC Secretariat **SHALL** provide notice 90 days before the 6-month period expires. After 6 months, the MMP is no longer eligible for a Reassessment and **MUST** complete a new Certification Application. The MMP **MAY** choose not to pursue a Reassessment and therefore Fail Certification.

The MMP **MUST** provide notice of the date when the additional information for the Reassessment will be provided. During the Reassessment, the Assessor **SHALL** use the updated documentation provided by the MMP to complete the evaluation of any outstanding indicators using the same processes that were used in the initial Assessment.

Once the Assessment is complete for all indicated indicators, the Assessor **SHALL** submit the Assessment Report to the MMP for approval. The Assessor **SHALL** submit a complete Assessment Report to the MMC Secretariat, and if it is deemed acceptable, the MMP will be eligible to continue the Certification process and no further Assessments will be **REQUIRED**. The MMP **SHALL NOT** use the Assessment Report in any way that asserts or implies that the results constitute Scheme Operator's or GSMA's approval of or endorsement of MMP or MMP's Mobile Money Business. MMP **SHALL NOT** revise, abridge, modify or alter the Assessment Report in any way.

If the MMP is not able to meet the requirements of the Assessment List at the time of the

Reassessment the Certification will be considered Failed, and if the MMP still wishes to pursue Certification the MMP **MUST** restart the Certification process once they can meet all the requirements.

4.5. Assessment Report

After completing the evaluation of the MMP, the Assessor **SHALL** submit an Assessment Report to the MMC Secretariat via the submission form on [the Accredited Assessor Dashboard](#). The Assessment Report **MUST** include a completed Certification Toolkit with the Assessor's notes in English and a recommendation on whether the MMP **SHOULD** be Certified.

Upon receiving the Assessment Report from the Assessor, the MMC Secretariat **SHALL** review for accuracy and completeness. If information is missing or otherwise needs clarification, the MMC Secretariat **MAY** request that the Assessor provide additional clarifications, or the MMC Secretariat **MAY** request supporting documentation that is needed to review the information in the Assessment Report.

The MMP **SHALL** have the opportunity to dispute any negative Assessment Reports through the [Dispute Resolution Process \[Section 9.3\]](#).

If the MMC Secretariat determines that the MMP has passed the requirements for Certification, it **SHALL** notify the MMP that it is eligible for Certification.

4.6. Certification Issuance

Once an MMP has been deemed eligible for Certification it **MAY** submit a Certification Request to the MMC Secretariat (available on [the MMP Dashboard](#)). The Certification Request is an indication to the MMC Secretariat that the MMP is ready to finalize their Certification, including the publication of their Certificate on the MMC Website, if Approved.

The final step in the Certification process is for the MMC Secretariat to review all provided documentation to ensure that the Certification Request from the MMP is complete. The MMC Secretariat **SHALL** review all the requirements for certification and ensure that all have been met before issuing the Certificate to the MMP.

The MMC Secretariat **SHALL** issue Certificates once all steps to the Certification process are complete, and that all fees have been verified as received. Once issued, the MMC Secretariat will store the Certification in the Certification database, which will be used to populate the Certified MMPs page.

Figure 7: Step 5 - Certification Issuance

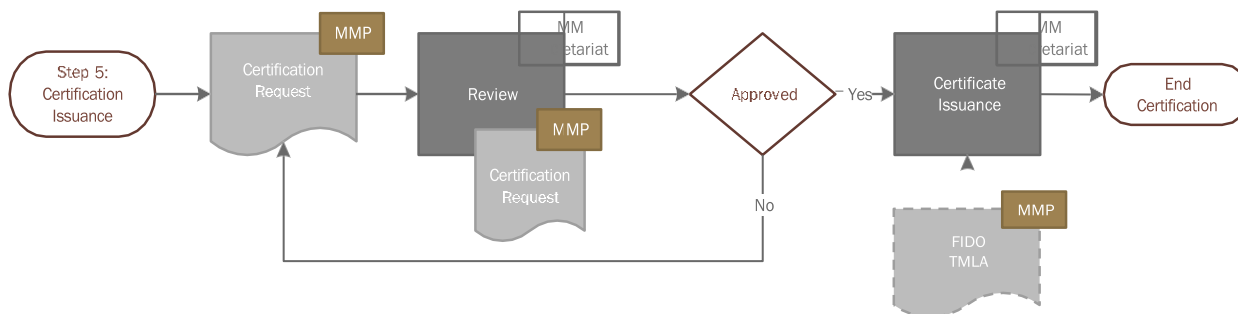


Table 5: Certificate Request Actions

Outcome	Description
Approval	The MMP's Certification request is approved and the MMP is Certified.
Rejection	Rejection MAY occur if any document is missing or invalid; or if any other condition exists that would prevent certification. If a certification request is rejected, the MMP will be notified by email with the corresponding reason(s) for rejection and will have the opportunity to resubmit. A Certification Request MAY be resubmitted three times before the status is updated to Failure.
Reassessment	A Reassessment will be carried out if non-compliance is found, or if the Assessment cannot be completed in full by the Accredited Assessor at the time of the Assessment.

Failure	<p>The request was rejected because the request was inappropriate or impossible.</p> <p>A meeting with the MMC Secretariat is REQUIRED before resubmitting an Application after a Failure</p>
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If a Certification Request is rejected or failed, the submitting MMP will have the right to submit a Dispute Resolution Request, which will follow the [Dispute Resolution Process \[Section 9.3\]](#).

4.6.1. Certificate

When the Certificate is issued, it will contain the following information:

- The name of the MMP that has been Certified
- The address of the MMP
- The version of the Certification Toolkit at the time of Certification
- The name of the Accredited Assessor that completed the Evaluation
- The name of the Accredited Consultant that assisted with the Certification process (if used)
- The Issuance Date of the Certification
- The Expiration Date of the Certification

Any restrictions, as necessary

- The Certificate Number in the format MMCYYYYMMDDNNN, where:
 - MMC = Mobile Money Certificate
 - YYYY = Year Issued
 - MM = Month issued
 - DD = Day issued
 - NNN = Sequential Number of Certificates issued that day

4.7. Trademark Licensing Agreement (TMLA)

MMPs that are Certified are eligible to complete a Trademark Licensing Agreement (TMLA) if they wish to use the Mobile Money Certified logo. Usage of the logo is OPTIONAL. The TMLA is available on [the Scheme Documents](#) page.

5. Certification Renewal

MMPs are **REQUIRED** to renew their Certification every three (3) years to ensure that they are maintaining their commitment to the Code of Conduct. Under normal circumstances, a mobile money provider becomes eligible to start the certification renewal process after this period.

The MMC Secretariat **SHALL** send a notice to the MMP within 30 days from when the MMP becomes eligible for renewing the certification. The MMP **MUST** file for a Certification Renewal within 60 days of receiving this notice by submitting a Renewal Request to the Scheme Operator indicating intent to renew. The MMP **MUST** complete the renewal process within six (6) months of receiving this notice to avoid the certification being automatically suspended.

From time to time, the certification criteria will be updated and brought into alignment with current polices, regulations, and best practices. If the renewal of the certificate is eligible less than six (6) months prior to issuing an update to the new criteria (toolkit), and the MMP wishes to certify under the new criteria, then the MMP will be eligible for an additional extension of six months to allow for compliance and assessment under the new criteria.

This process will follow the same structure as the initial certification process; however, the MMP **MAY** provide incremental updates and supplementations to its documentation that was used for the initial certification to save in the overhead of gathering documentation. The Assessor **MAY** use the incremental documentation as a basis for evaluating the compliance to the Certification toolkit. However, in the case where standards are updated, or significant changes have been made, the complete Certification Toolkit Self-Evaluation **MAY** be **REQUIRED**.

Upon completing the Renewal Assessment, the Accredited Assessor **SHALL** submit an Assessment Report to the MMC Secretariat. The MMC Secretariat will be responsible for ensuring the report is valid and complete and **MAY** request additional clarifying information. In the case where there is non-compliance or incomplete information provided by the MMP; a

Reassessment MAY be **REQUIRED**.

If the Renewal Report is Approved, the MMC Secretariat will notify the MMP and update the Certificate and the Certification database accordingly.

Table 6: Certification Renewal Steps

Process Step	Responsibility	Description
Preparation	MMP	Gathers incremental updates and supplemental documentation for the Renewal Evaluation.
Renewal	MMP	Submits Renewal Notice to the MMC Secretariat.
Notice	MMC Secretariat	Reviews Renewal Notice, and Approves, Rejects, or requests more information.
Certification Assessment:	MMP	Provides REQUIRED documents to the Accredited Assessor via the online dashboard.
Online Review	Accredited Assessor	Evaluates the documents provided by the MMP
Certification Assessment: Virtual Review	Accredited Assessor	Completes interviews and Virtual reviews.
Assessment Report	Accredited Assessor	Upon completing the REQUIRED evaluations, submits an Assessment Report to the MMC Secretariat.
	MMC Secretariat	Reviews Assessment Report, and approves, rejects, or requests more information.
Certificate Issuance	MMP	Submits a Certification Request.
	MMC Secretariat	Reviews Certification Request, and approves, rejects, or requests more information.
TMLA (Optional)	MMP	Completes the TMLA for usage of the Mobile Money Certified Logo.
	MMC Secretariat	Cross-signs and returns the TMLA to the MMP.

6. Denial of Certification

The Scheme Operator MAY deny certification to an MMP that the scheme operator feels puts at risk the reputation of the Scheme or if there is fraud or forgery detected during any part of the certification process. If such an incident arises, the scheme operator SHALL notify the GSMA prior to making such determination, as the GSMA has its brand attached to the scheme.

7. Certification Suspension

An active Certificate MAY be suspended by the Scheme Operator if after notification of or investigations by the MMC Secretariat, it is found that the MMP fails to meet the terms within the MMP Certification Assessment Agreement (see [Scheme Documents](#))

In the event that the Scheme Operator becomes aware of a suspension event, the MMC Secretariat SHALL investigate the claim to determine if the event is cause for Suspension. The MMC Secretariat MAY decide that (a) no further action is REQUIRED and the Certification remains Active, or (b) a Reassessment is REQUIRED to verify the MMP still meets Certification Requirements.

MMPs SHALL be given at least a 30-day notice by the MMC Secretariat prior to updating the Certificate status to Suspended, along with the necessary steps to remove the Suspension (reassessment). Suspension is an indication that the Certification is undergoing a Reassessment. The Suspended status SHALL NOT be publicly shared, but the MMP SHALL be removed from the [Certified MMPs page](#) while the Certificate status is Suspended.

7.1. Reassessment

The MMP MAY be Suspended and REQUIRED to participate in a Reassessment of its Mobile Money Business in the event that if the MMP fails to meet the terms within the MMP CoC Assessment Agreement, a copy of this agreement can be found on the MMC Website (see

Scheme Documents).

The Reassessment applies to only the areas identified by the MMC Secretariat as in need of reassessment, and will be individual to each MMP under Reassessment. The Reassessment items will be provided to the MMP and Accredited Assessor, and the Accredited Assessor will be responsible for providing a Reassessment Report based on the Reassessment items. Once complete, the Accredited Assessor will submit the Reassessment Report to the MMP and the MMC Secretariat, and the Certification Assessment process **SHALL** be followed.

The MMC Secretariat **SHALL** review the Reassessment Report and Approve, Reject, or request more information.

If the MMP passes the Reassessment (the Reassessment Report is Approved by the MMC Secretariat), the Suspension **SHALL** be removed, and the Certification status **SHALL** be updated to Active.

If the MMP fails the Reassessment (the Reassessment Report is rejected by the MMC Secretariat), or the Reassessment is not completed within 180 days, the status **SHALL** be updated to Revoked. MMPs **MAY** request Revocation at an earlier date if they choose not to complete a Reassessment.

8. Certification Revocation

A Certificate **MAY** be revoked by the Scheme Operator.

Revocation is an indication that the Certificate is no longer certified and **MUST** undergo a new Certification to be Certified.

The MMC Secretariat **SHALL** provide 30-day notice prior to updating the Certificate status to Revoked.

Revocation events include:

1. Certificate expiration, or
2. Remaining in a Suspended status for more than 180 days.

9. Scheme Administration

The Scheme Operator **SHALL** be responsible for maintaining these policies and will have the authority to change them as they see fit.

9.1. Sensitive Information

9.1.1. Data Protection

The MMC Secretariat **SHALL** be responsible for protecting sensitive information during transit and storage.

When submitting electronic documentation to the MMC Secretariat, it **MUST** be uploaded using forms on the MMP Dashboard.

All Mobile Money Certification forms and their attachments **SHALL** be stored within an encrypted database only accessible by the MMC Secretariat, and will not be shared.

Unless a previous agreement has been made between the MMC Secretariat and the MMP, Accredited Assessor, or Accredited Consultant, all documents sent via email **SHALL NOT** be reviewed and **MUST** be deleted.

9.1.2. Certification Status

No MMP, Accredited Assessor, Accredited Consultant, nor other third-party **SHALL** refer to a product, service, or facility as Mobile Money approved, accredited, certified, nor otherwise state or imply that GSMA (or any agent of GSMA) has in whole or part approved, accredited, or certified a MMP, Assessor, Consultant, or other third-party or its products, services, or facilities, except to the extent and subject to the terms, conditions, and restrictions expressly set forth within an Accredited Certification or Mobile Money Certificate issued by the Scheme

Operator.

9.2. Certification States

A list of Certified MMPs **SHALL** be maintained by the MMC Secretariat and a public list will be available on the Mobile Money Certification website (see Certified MMPs). Certification **MUST** be in one of the following states: Active, Certified, Suspended, or Revoked.

9.2.1. Active

Once an application is submitted to the MMC Secretariat, the Certification state **SHALL** be set to “Active”.

This state **SHALL NOT** be shared outside of the MMC Secretariat, Assessor, and Consultant (if used) chosen by the MMP.

9.2.2. Certified

A MMP with a “Certified” status is one that has been issued a Certificate and is in good standing.

9.2.3. Suspended

A Certificate **MAY** be suspended, for more information on the Suspension process, see Section 5.

9.2.4. Revoked

A Certificate **MAY** be revoked, for more information on Revocation, see Section 7.

9.3. Dispute Resolution Process

In the event where a MMP is seeking Certification dispute resolution, a Dispute Request **MAY** be submitted to the MMC Secretariat (available on the [MMP Dashboard](#)).

Upon receipt of a Dispute Request, the MMC Secretariat **SHALL** forward the Dispute Request to

the Scheme Operator. The Scheme Operator is responsible for determining the validity of the request and the appropriate routing of the request.

If the Certification has outstanding disputes or other issues, the certification MAY be delayed. If the certification is delayed, the MMC Secretariat SHALL notify the MMP seeking Certification.

9.4. Complaints Policy and Procedure

The GSMA Mobile Money Certification (MMC) scheme is committed to providing a quality service for all mobile money organizations seeking certification in an open and accountable way that builds the trust and respect of all our stakeholders. One of the ways in which we can continue to improve our service is by responding positively to complaints, and by putting mistakes right.

Therefore, we aim to ensure that:

- Making a complaint is as easy as possible;
- We treat a complaint as program concern that calls for an immediate response;
- We deal with it promptly, politely and, when appropriate, confidentially;
- We respond in the right way;
- We learn from complaints, use them to improve the certification program (if applicable), and review annually our complaints policy and procedures.

We recognize that many concerns/complaints might be raised informally and dealt with quickly. The aim is to:

- Resolve informal concerns quickly;
- Keep matters low-key;
- Enable mediation between the complainant and the individual to whom the complaint has been referred.

An informal approach is appropriate when it can be achieved. But if concerns cannot be satisfactorily resolved informally, then the formal complaints procedure should be followed.

9.4.1. Introduction

Definition: The GSMA Mobile Money Certification (MMC) defines a complaint as 'any expression of dissatisfaction (with process or procedures, certified providers, misuse of logo, or any other issues arising within the scheme) that relates to MMC and that requires a formal response'.

Purpose: The formal complaints procedure is intended to ensure that all complaints are handled fairly, consistently and wherever possible resolved to the complainant's satisfaction.

MMC Secretariat responsibility will be to:

- Acknowledge the formal complaint in writing (email);
- Respond within a stated period of time;
- Deal reasonably and sensitively with the complaint;
- Take action where appropriate.

A complainant's responsibility is to:

- Bring their complaint, in writing (email or website), to MMC's attention normally within 1-2 weeks of the issue arising;
- Raise concerns promptly and directly with a member of staff in the MMC Secretariat;
- Explain the problem as clearly and as fully as possible, including any action taken to date;
- Allow MMC Secretariat a reasonable time to deal with the matter;
- Recognize that some circumstances may be beyond MMC Secretariat's control.

Responsibility for Action: Mobile Money Certification Secretariat and Certi-Trust.

Confidentiality: Except in exceptional circumstances, every attempt will be made to ensure that both the complainant and MMC Secretariat maintain confidentiality. However, the circumstances giving rise to the complaint may be such that it may not be possible to maintain confidentiality (with each complaint judged on its own merit). Should this be the case, the situation will be explained to the complainant.

Monitoring and Reporting: MMC stakeholders will receive annually an anonymized report of complaints made and their resolution and complaints will be dealt with in accordance with MMC’s Privacy Policy.

TITLE	RESPONSIBILITY
SCHEME OPERATOR	Entirely responsible for the Mobile Money Certification Scheme on behalf of GSMA.
GSMA	Owns and maintains the compliance criteria to ensure they best represent industry needs.

9.4.2. Formal Complaints Procedure

The following procedure is in place to provide a clear process for all MMC complaints, regardless of their nature or origin.

Submission

1. Send a complaint through email or via the GSMA Mobile Money Certification contact us [website](#) indicating “other” from the dropdown menu. Please include enough details in your complaint so that it can be triaged appropriately. This should include complainant name, contact details (email and phone), details of the complaint including who you have already been dealing with (if any), date of occurrence (if applicable). For complaints involving a certified provider, the name and certificate number (if known) is required.
2. Formal acknowledgement of the complaint will be sent within 48 hours of receipt within the system and that the review process has begun.

Review Process and final decision

The official communication of the complaint with the Complaint Review Team will begin process within 4 working days of receipt into the system.

The Complaint Review Team will review the complaint and triage accordingly:

- a) Minor – easily resolved without any additional feedback
- b) Moderate – complaint that can be resolved through email with members of the Complaint Review Team
- c) Major – complaint that cannot easily be resolved, or resolved through email, thus requiring the Complaint Review Team to convene a meeting for discussion, request for additional information, etc.

The Complaint Review Team will coordinate all communication to all parties related to the submitted complaint, which may include certified or potentially certified providers.

The Complaint Review Team will provide a written (email) response to the complaining party with the indicated resolution within 30 days of initial receipt of complaint. If additional time is required, the complainant will be notified of progress and estimated timescale.

The resolution identified by the Complaint Review Team will serve as the final decision.

Rebuttal

If you are not satisfied with the subsequent reply from MMC Secretariat, then you have the option of emailing the Director of Certification at kenya@certi-trust.com stating the reason why you are dissatisfied with the outcome within 3 working days after receipt of the resolution. A response as to the rebuttal will occur within 10 working days to inform you of the action which will be taken to investigate your complaint, and when you can expect to hear the outcome of the investigation.

9.5. Certification Management

The Scheme Operator will be authorized to audit the program from every process perspective.

This audit will include a review of every process related to the program and may include, but not limited to, all of the following:

- Review and modification of the program policies and procedures.
- Review and audit of assessment processes and procedures.
- Execution and use of TMLA.
- Evaluation of program documentation and execution.
- Review and evaluation of the assessment company and processes.

9.6. Operational Reports

The MMC Secretariat **SHALL** provide Operations Reports as requested by the Scheme Operator.

Any reporting performed by the MMC Secretariat **SHALL** be performed at the aggregate level to preserve confidentiality, and **SHALL NOT** include the specific name or details of any MMP.

Operational reports will include:

- The number of certification requests,
- The number of certifications granted,
- Disputes and their resolutions,
- Process updates,
- Certification mark violations,
- Any other notable events or operational metrics.

10. Appendix A: Terms & Abbreviations

Table 7: Terms & Abbreviations

Term/Abbreviation	Definition
Accredited Assessor	The entity responsible for evaluating that a MMP meets the requirements for Mobile Money Certification, per the indicators in the Certification toolkit. Assessors MUST be Accredited according to the Mobile Money Assessor Accreditation Policy and Processes.
Accredited Consultant	An individual responsible for assisting MMPs to meet the requirements for Mobile Money Service Certification. Consultants MUST be Accredited according to the Mobile Money Consultant Accreditation Policy and Processes.
CoC	Code of Conduct
Consultant Applicant	An individual actively completing the Consultant Accreditation process in order to be an Accredited Consultant for the Mobile Money Certification Scheme
GSMA	GSM Association. A trade body that represents the interests of mobile network operators worldwide
MM	Mobile Money
MMP	Mobile Money Provider. A company offering a mobile money service.
Mobile Money Certification Secretariat (MMC Secretariat)	The Mobile Money Certification Secretariat (MMC Secretariat) is the individual or team of individuals overseeing the operation of the Mobile Money Certification Scheme on behalf of the Scheme Operator.
Scheme Operator	The Scheme Operator is the entity responsible for managing the Mobile Money Certification Scheme on behalf of GSMA.

11. Appendix B: References

Table 8: References

Reference	Title	URL
Accredited Assessor Dashboard	Accredited Assessor Dashboard	Assessors – Mobile Money Certification (Accredited Assessor Account REQUIRED)
Accredited Consultant Dashboard	Accredited Consultant Dashboard	Consultants – Mobile Money Certification (Accredited Consultant Account REQUIRED)
Accredited Consultant List	Accredited Consultant List	Consultants – Mobile Money Certification
Scheme Documents	Certification Scheme Documents	Certification Scheme Documents – Mobile Money Certification
Certified MMPs	Certified Mobile Money Providers List	Certified Mobile Money Providers – Mobile Money Certification
MMC Website	Mobile Money Certification Website	About the Certification – Mobile Money Certification
MMP Dashboard	Mobile Money Provider Dashboard	Mobile Money Provider Login – Mobile Money Certification (MMP Account REQUIRED)
RFC 2119	Key words for use in RFCs to Indicate Requirement Levels	https://tools.ietf.org/html/rfc2119

