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22-24 January 2019  
Cairo, Egypt

#financialinclusion

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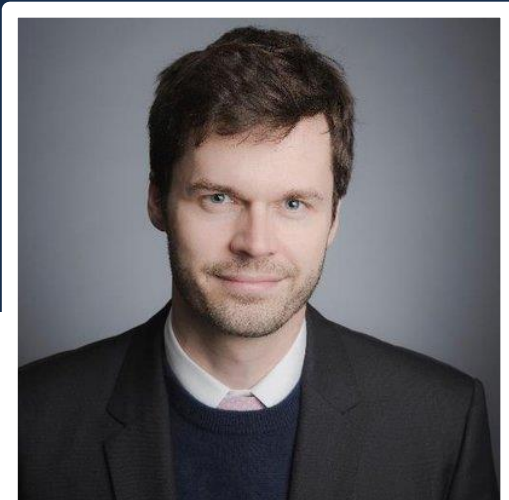


# SKILLS WORKSHOP 3: REGULATORY ENABLERS OF DIGITAL FINANCIAL SERVICES

Ivo Jenik, Ahmed Dermish  
January 24, 2019



# Speakers



**Ivo Jenik**

Financial Sector Specialist  
(CGAP)



**Ahmed Dermish**

Policy and Digital Ecosystem Specialist  
(UNCDF)

# Agenda

9:10 – 9:50	Introduction to Regulatory Framework for Inclusive DFS
9:50 – 10:00	Mini-exercise
10:00 – 11:00	Basic Regulatory Enablers of Inclusive DFS
11:00 – 11:15	Coffee Break
11:15 – 12:00	Group Exercise
12:00 – 12:50	Train-the-Trainer
12:50 – 13:00	Conclusion

# Teaching Methodology

## Key principles

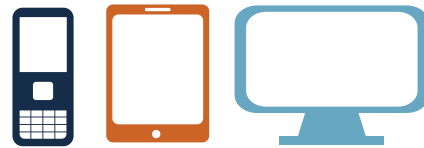
- Modular
- Flexible
- Interactive
- Engaging
- Practical
- Illustrated (by examples)
- Supported (by evidence)

# Introduction to Regulatory Framework for Inclusive Digital Financial Services

Setting the scene



# Digital financial services (DFS) are financial services accessed through digital devices and delivered through digital channels



**Products and services include:**



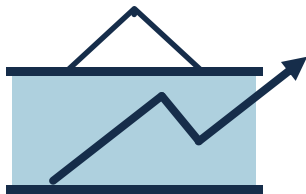
Payments  
and transfers



Credit (disbursement and  
repayments)



Deposits  
and savings



Investments (money  
market funds,  
government bonds)

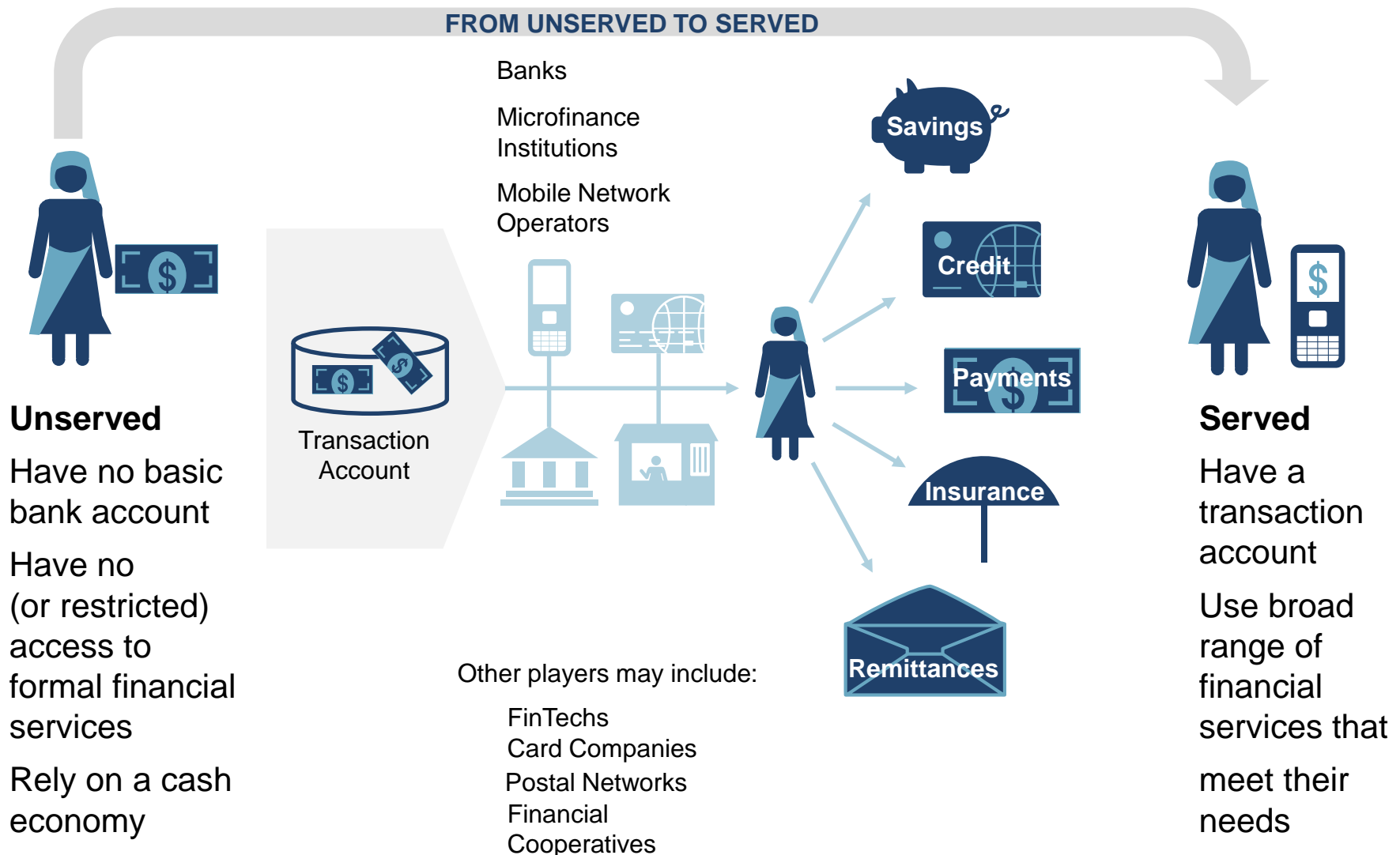


Insurance (payment of premia and  
payout of insurance proceeds)

etc

And many other  
products and services

# Empowering people through financial inclusion





# Financial inclusion means that adults use formal financial services to improve their financial health

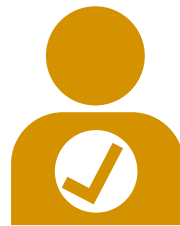
The goal is for all working age adults to have effective access to a range of financial services provided by formal institutions (and use them to improve their financial health)



convenient



responsibly  
delivered



meet the  
needs of  
customers



affordable  
for customers



sustainable  
for providers

# When digital financial services help improve financial inclusion...



# Examples of digital products and services furthering financial inclusion



Mobile money and related use cases (credit, savings, remittances, utility payments)



Peer-to-peer lending (access to investment opportunity; access to debt funding)



Crop insurance bought via phone when purchasing seeds

# 4 characteristics of digitally-driven financial inclusion



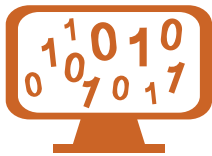
## **Customer profile**

Financially excluded and underserved customers are first-time users of financial services, which makes them vulnerable



## **New providers & business models**

Services are provided by new financial institutions such as: non-banks, FinTechs and BigTechs. The services are provided through new business models, such as: crowdfunding, ICOs, and lenders using BigData analytics



## **Intensive use of digital technology**

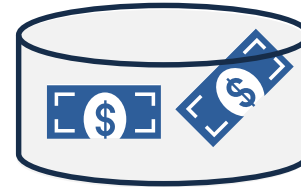
Financial service providers extensively rely on technology to improve speed, convenience, accuracy, access, affordability and security



## **Use of agents**

Agents represent a significant distribution channel and physical point of contact (compared to traditional branches and ATMs)

# New entrants, new risks & proportionality



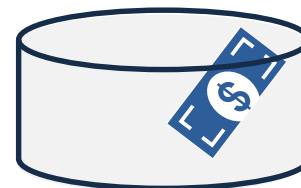
Balance sheet



Loan operations



E-money issuer



Balance sheet



# Proportional regulation considers costs against risks relevant to:



Regulator and supervisor



Government and society



Financial service providers



Customers

# Why regulate financial services?

**To address market failures and imperfections concerning the key regulatory objectives: Inclusion, Stability, Integrity and Protection.**

I-SIP is a structured framework to identify linkages – synergies and trade-offs – and help authorities be proportional, i.e., take measures that are most likely to arrive at the desired outcome considering the interrelationship among objectives

**I** **Inclusion:** Promote access, use, quality and customer wellbeing/impact

**S** **Stability:** Preserve safety and soundness of individual providers and the system as a whole

**I** **Integrity:** Prevent criminal exploitation of the financial system

**P** **Protection:** Prevent harm to users of (formal) finance



# Application of the I-SIP framework

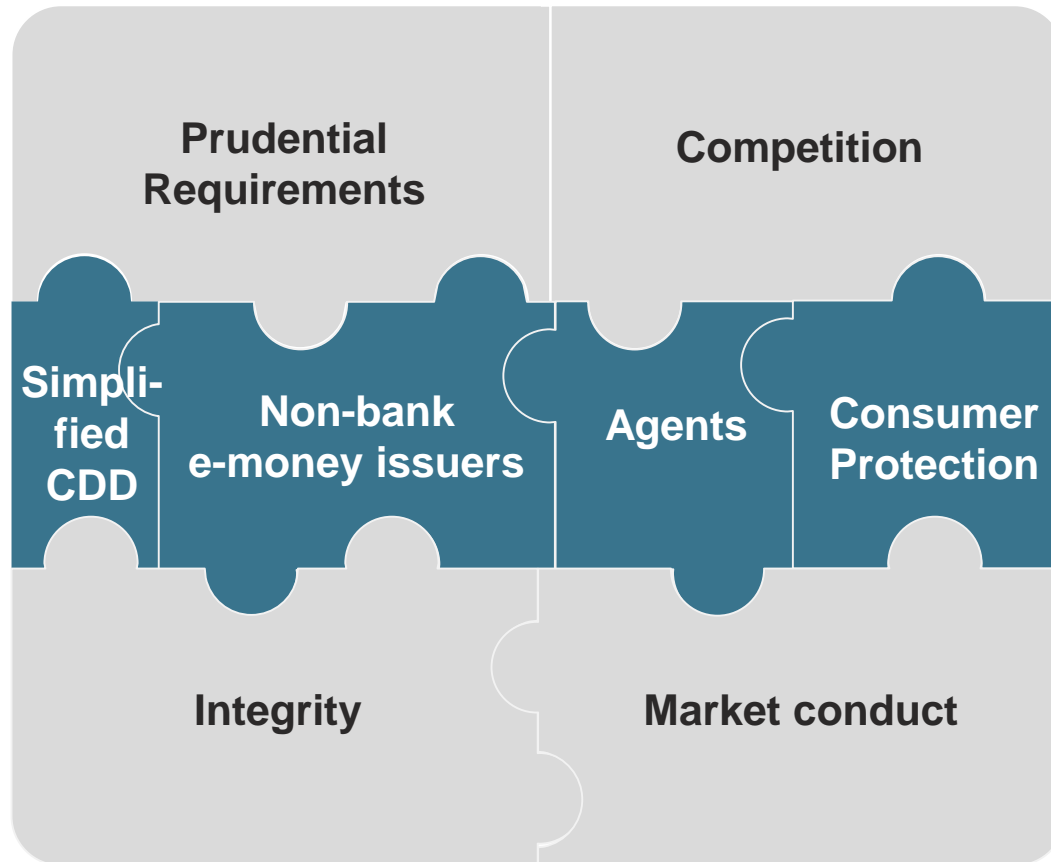
Analyzing the synergies and trade-offs between financial inclusion and integrity objectives

		Impact on financial inclusion		
		NEGATIVE	NONE	POSITIVE
Impact on financial integrity	POSITIVE	<b>Integrity enhancing, inclusion reducing</b>	<b>Integrity without tradeoffs with inclusion</b>	<b>Synergy</b>
	NONE	<b>Bad policy</b>	<b>Ineffective policy</b>	<b>Inclusion without tradeoff with stability</b>
	NEGATIVE	<b>Lose-lose</b>	<b>Bad policy</b>	<b>Inclusion enhancing, integrity reducing</b>

# Basic Regulatory Enablers of Inclusive DFS

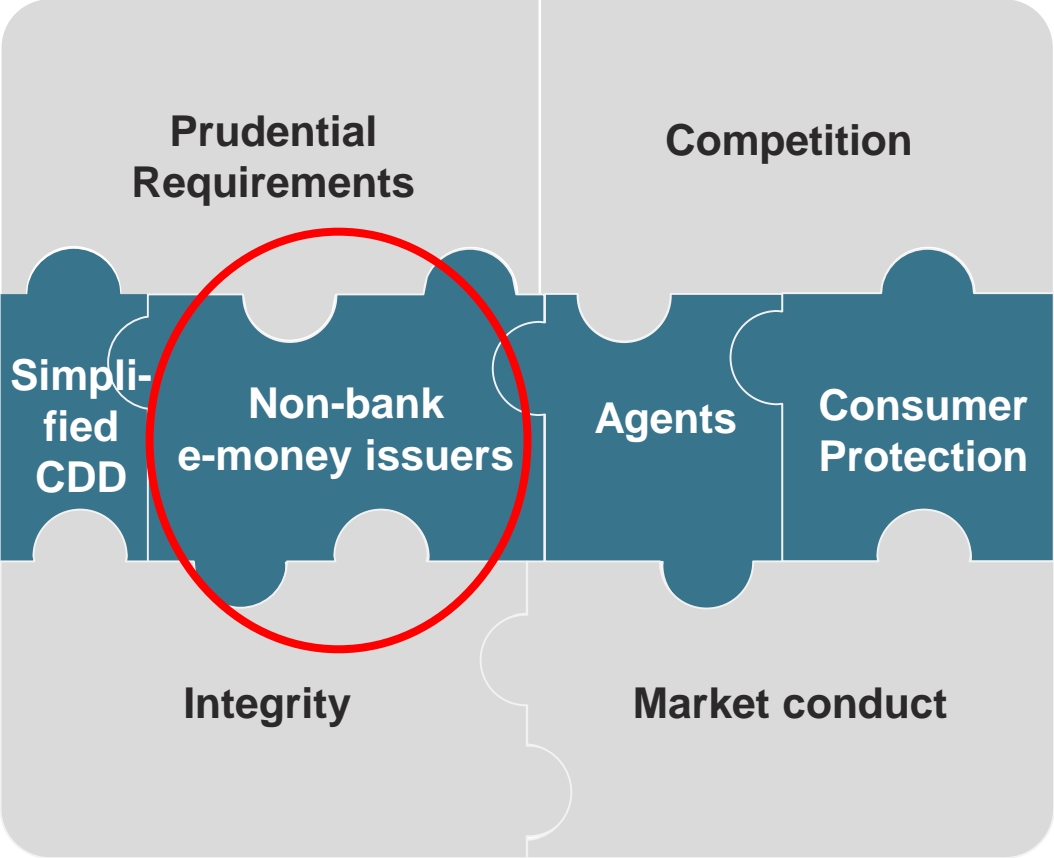
Basic doesn't mean easy

# 4 basic enablers for digital financial services



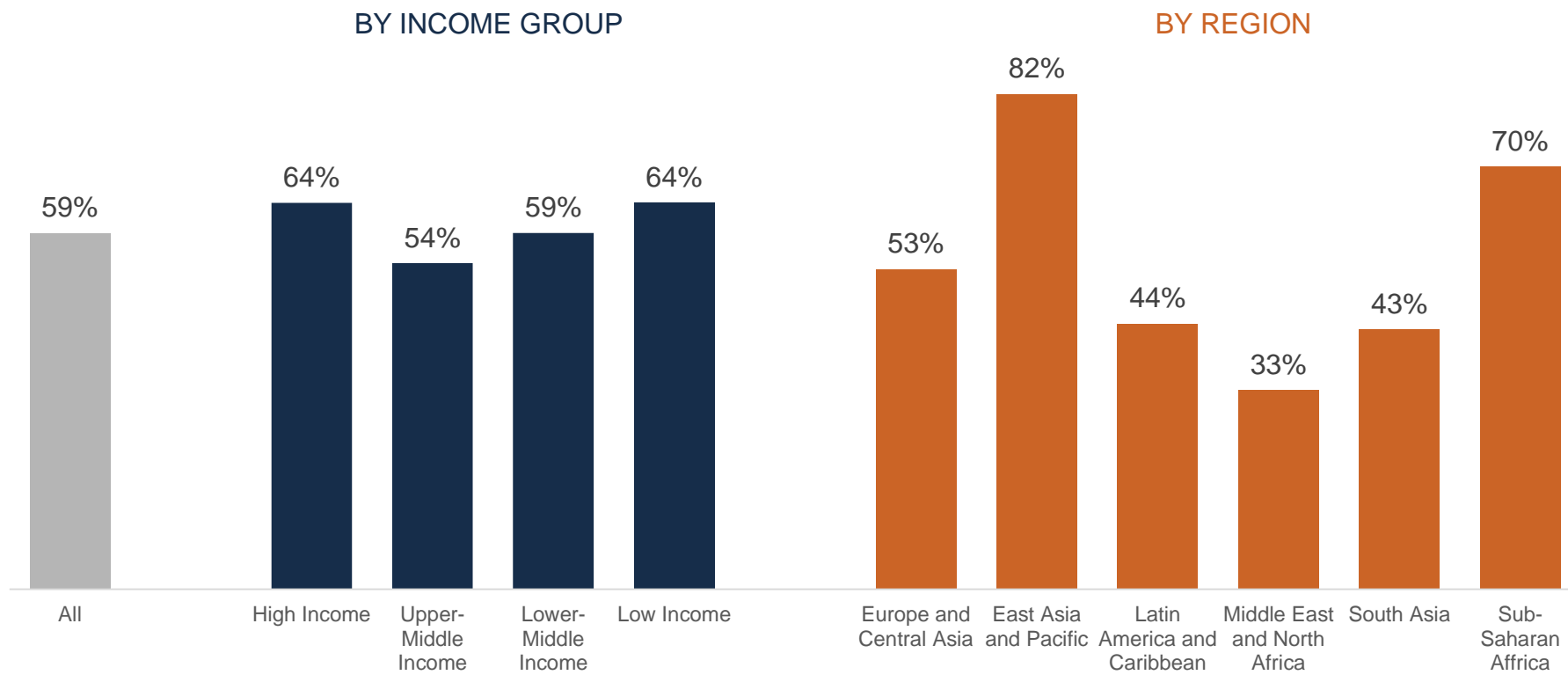
# Mini-exercise

Policy priorities



# However, e-money issued by non-banks is key to digital financial inclusion

Percentage of responding jurisdictions that have a legal/regulatory framework for nonbank e-money issuers.



# There are two main steps to enable e-money issuance



## Defining e-money (function & nature)

- Facilitate payments
- Store value electronically
- Differ from other deposits



## Authorizing and regulating e-money issuers

- Eligibility
- Capital requirements
- Permitted activities
- Protection of customer assets

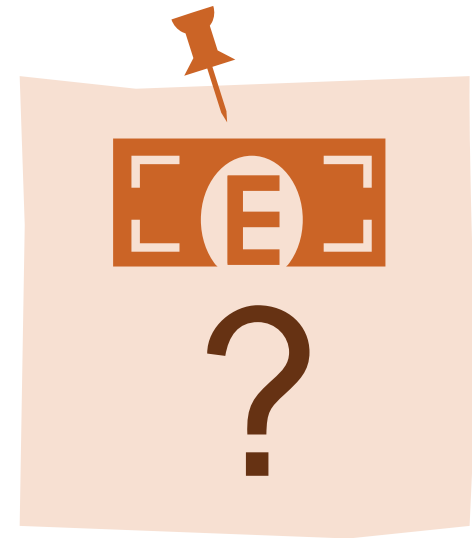


# What is e-money?

E-money is whatever the regulator says e-money is (great diversity)...

...but let's not confuse e-money with:

- Electronic representation of deposit
- Cryptocurrencies
- Virtual currencies
- Digital fiat currencies



Value issued upon receipt of funds and electronically stored on a device or system (e.g., prepaid card, SIM, computer system); accepted as means of payment by parties other than issuer; convertible into cash 1:1

# Two categories of e-money issuers (EMIs)



banks



non-banks

**Under each category there can be a variety of different entities**

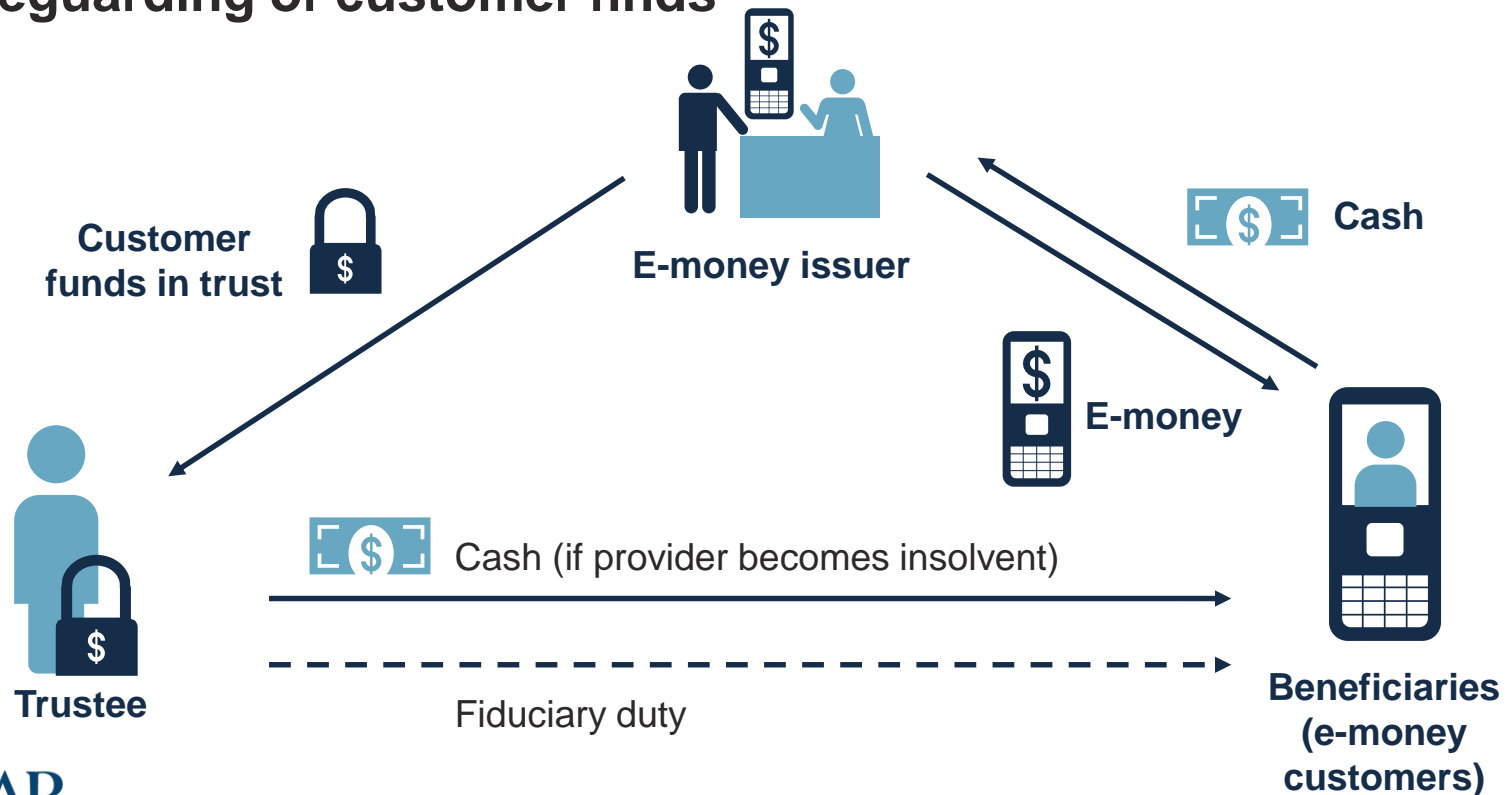
E-money regulation allows non-banks to offer transactional accounts, but some countries prefer ‘the account business’ to remain the role of banks:

- Niche banks (Mexico)
- Payments banks (India)
- Microfinance banks (Pakistan)


See [the examples](#) of institutions allowed to issue e-money.

# Other main regulatory areas include:

- Capital requirements
- Permitted activities
- AML/CFT
- Consumer protection
- Safeguarding of customer funds



# Country-level requirements



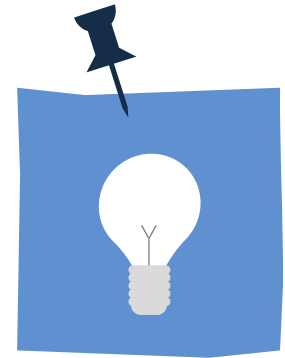
**Paraguay:** E-money issuers are required to store customer funds in autonomous funds managed by one or more fiduciaries, which are limited to banks, financial companies, or specially authorized fiduciary companies.

## European Union

- 100% of customer funds must be isolated from the e-money issuer's other funds and deposited in a separate account in a 'credit institution' or invested in "secure, liquid low-risk assets"; or
- the e-money issuer must obtain an insurance policy or similar guarantee from an insurer or credit institution, covering the full value of outstanding e-money liabilities.

**Namibia:** Outstanding e-money liabilities must be held in trust in one or more licensed banks, subject to a written instrument under the Trust Moneys Protection Act.

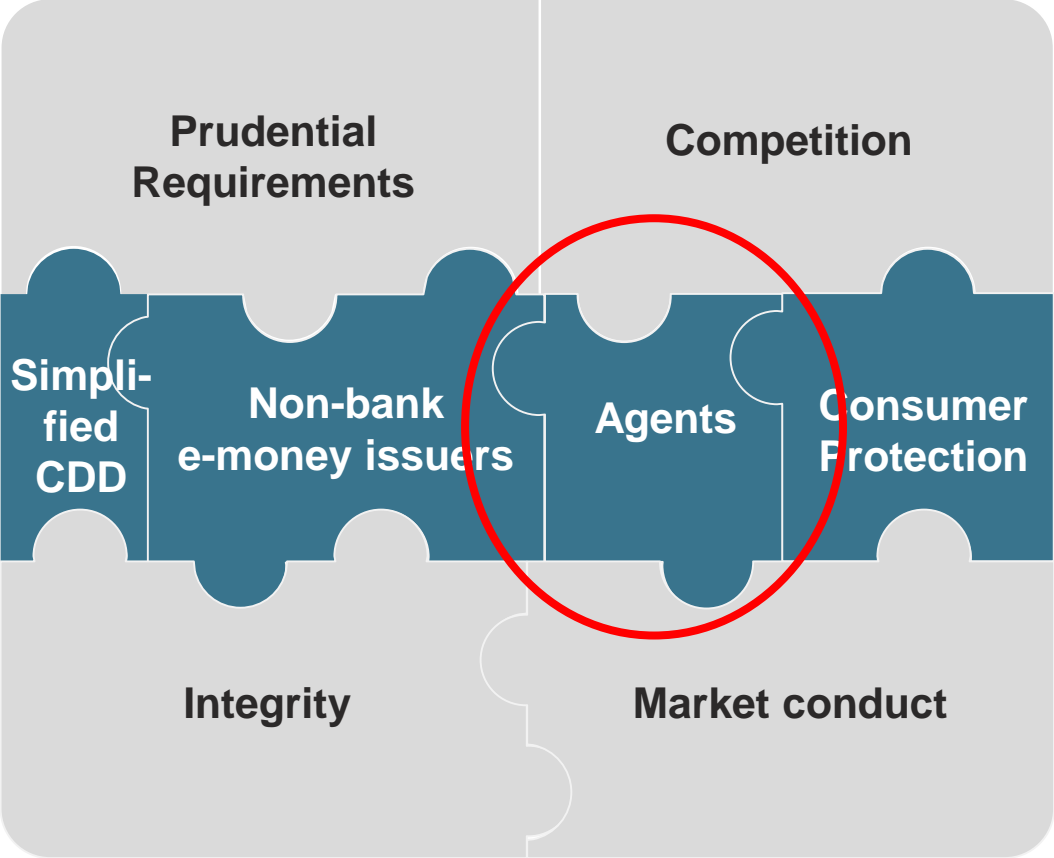
# Key Points To Remember



Non-bank e-money issuers are the real game changers in financial inclusion

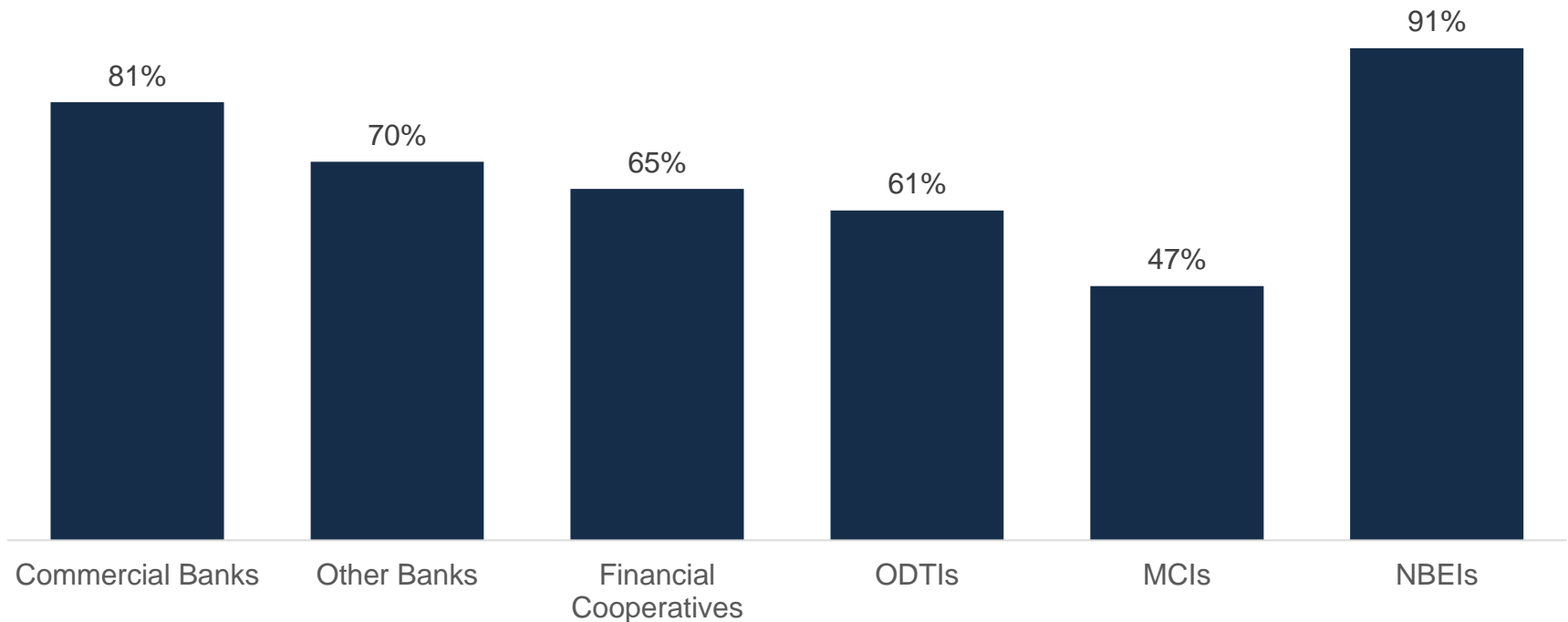
Even though different business models exist (even within a single jurisdiction), regulation should ensure level playing field

Prudential and market conduct regulatory requirements should be proportional to risks posed by specific types of providers and their products (which means the prudential controls should be lower for EMIs)



# Agents address the channel challenge and are allowed in most jurisdictions

Percentage of responding jurisdictions that permit the use of retail agents as third-party delivery channels, by institutional category



Note: Percentages are based on 118 responding jurisdictions for Commercial Banks, 64 for Other Banks, 71 for Financial Cooperatives, 57 for ODTIs, 57 for MCIs and 67 for NBEIs.



# The nature of the agency relationship determines the areas of regulatory concerns



...and the obligations of principal and agent ex ante (eligibility) and ongoing (compliance)

# A vibrant regulatory discussion concerns the question of exclusivity and interoperability of agents

**Can they be shared across providers?**

Current regulatory approaches to exclusivity vary:



Mandatory  
non-exclusivity  
(Uganda)



Mandatory  
exclusivity  
(Indonesia)

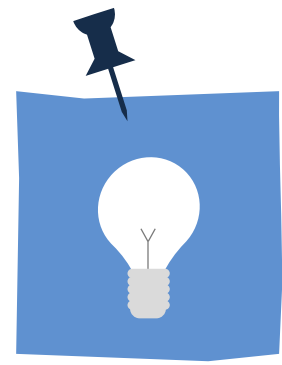


No regulation  
(Philippines)

# Countries where agents work for many providers...



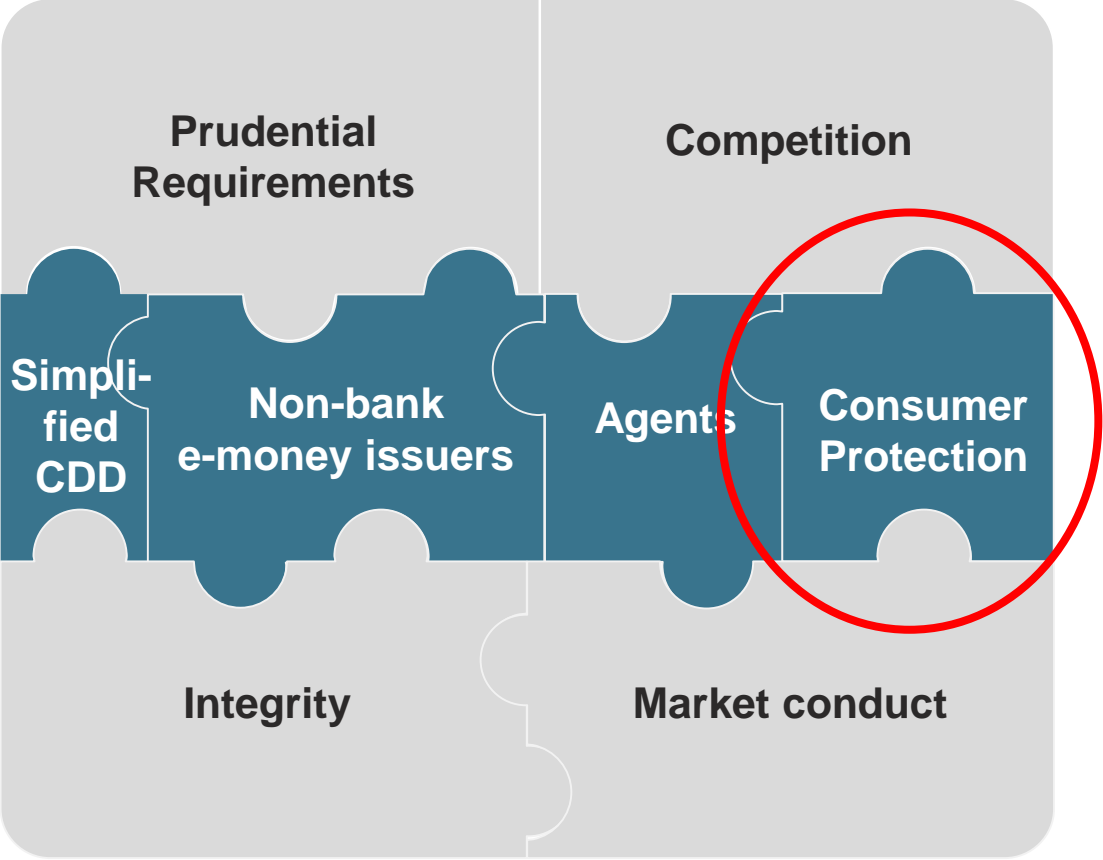
# Key Points To Remember



Agents address the challenge associated with traditional physical channels such as branches and ATMs

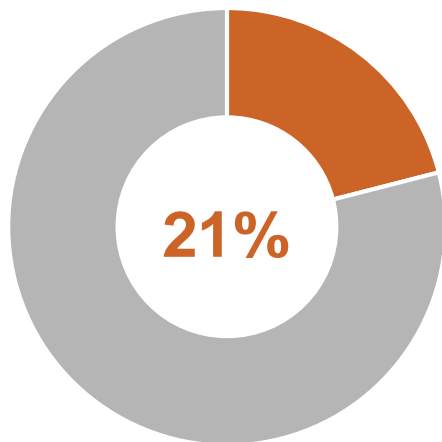
A harmonized regulatory approach to agents, regardless of whether the provider is a bank or nonbank, works best.

Exclusivity may be less of an issue than it appears to be unless the regulator has a strong evidence that exclusive dealings cause significant market distortions.

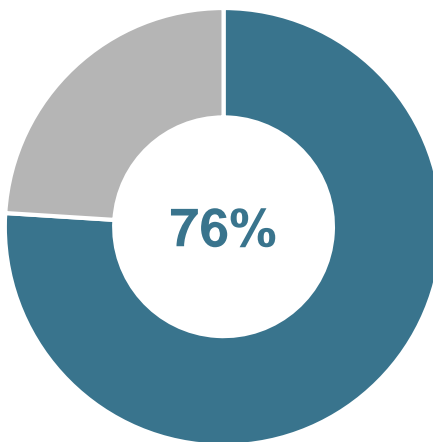


# Over the past decade, the number of jurisdictions with consumer protection rules in place increased significantly

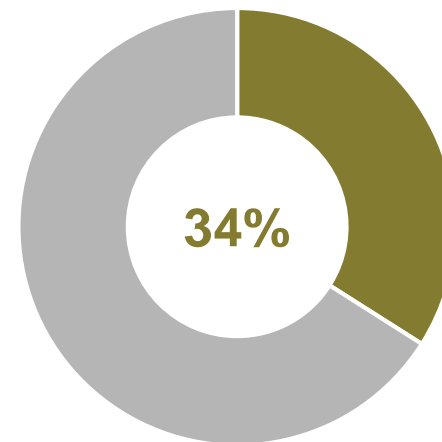
Percentage of jurisdictions with **standalone financial consumer protection laws** in place



Percentage of jurisdictions with consumer protection provisions in place **within other financial sector laws (e.g., banking law)**



Percentage of jurisdictions with general consumer protection laws in place that have **explicit references to financial services**



# Protection of consumers in a digital environment has its specifics:



New providers & business models



Intensive use of technology



Use of agents



Customer profile

leading to new dynamics, behavior and risks that require a specific regulatory response



# There are 5 main regulatory areas pertinent to digital financial consumer protection



Transparency  
& disclosure



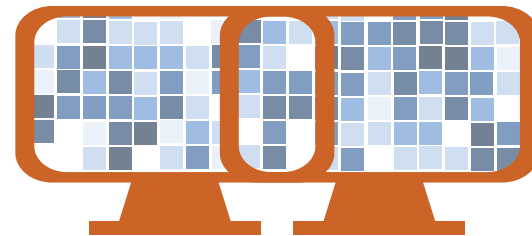
Consumer  
recourse



Protection  
against fraud



Data protection and  
privacy



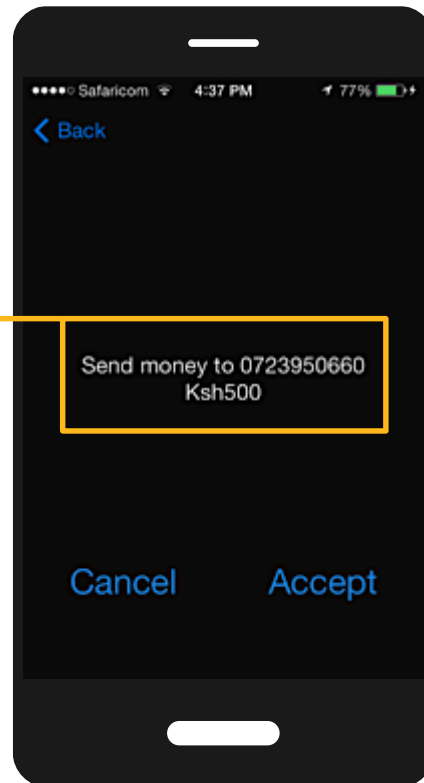
Network & technology

# Transparency-related issues in digital financial services

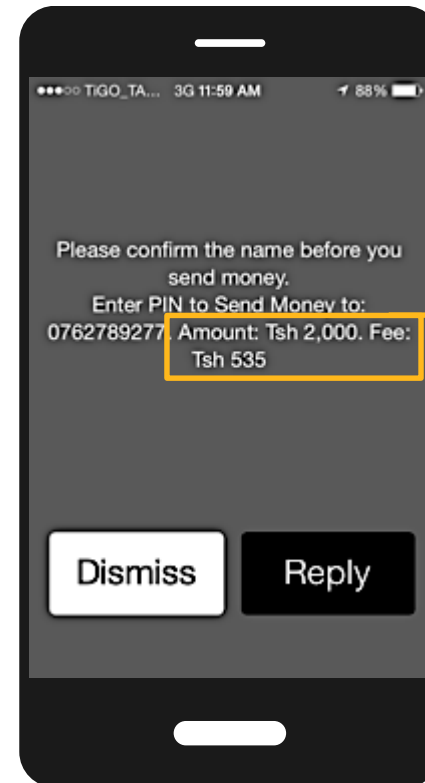


## Disclosure of cost

No disclosure of transaction fee



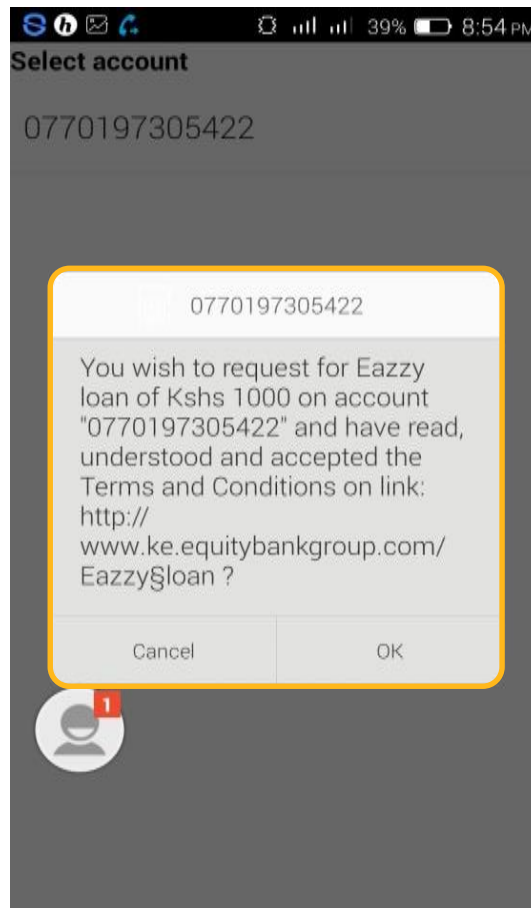
Transaction fee clearly disclosed



# Transparency-related issues in digital financial services



## Disclosure of Terms and Conditions



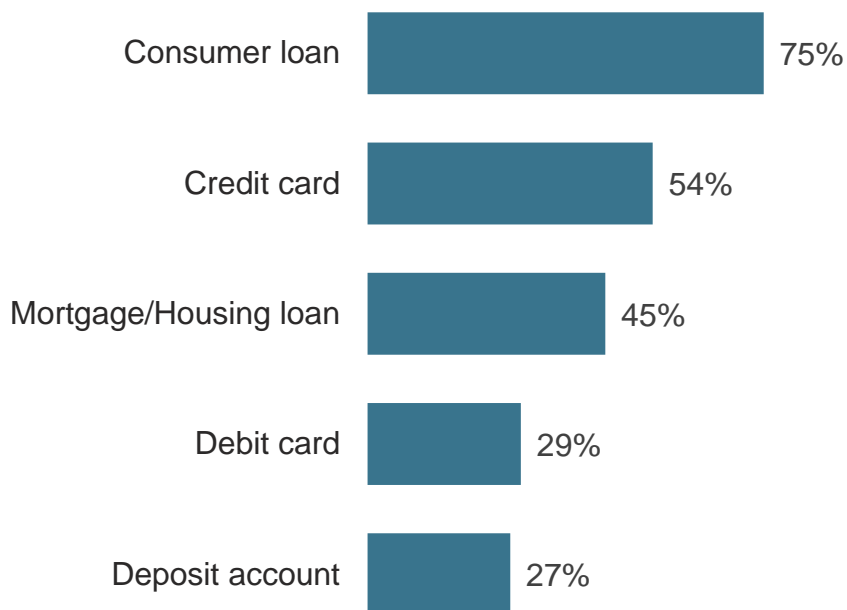


Easy access to an effective complaints mechanism is a powerful tool from which customers, providers and regulators can benefit.

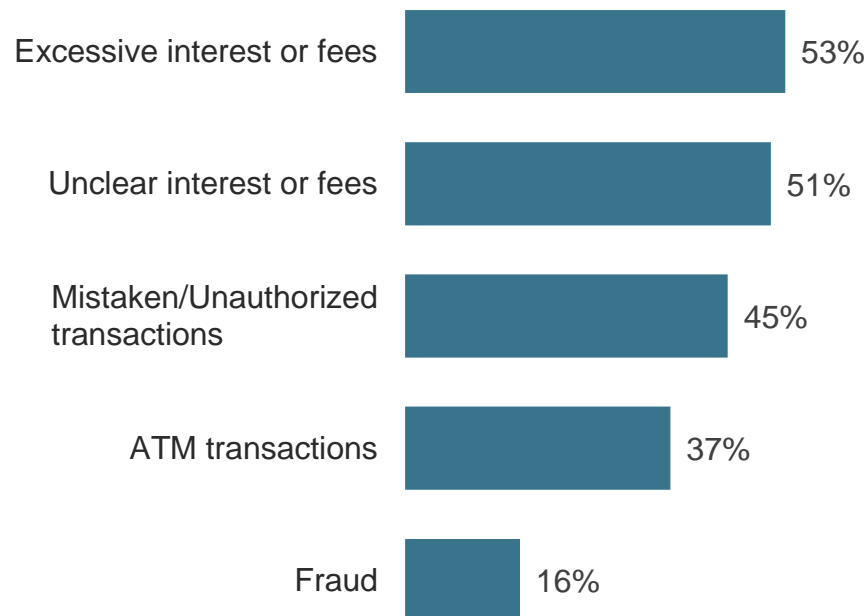
# What do people complain about?



## Disputes most commonly addressed by ADR entity, by product:



## Disputes most commonly addressed by ADR entity, by issue:



Note: Percentage of relevant responding jurisdictions ranking financial products as first, second, or third most commonly addressed by ADR entity.

Source: [Global Financial Inclusion and Consumer Protection Survey 2017](#) (World Bank)

# Regulators set minimum standards of complaints handling, including:



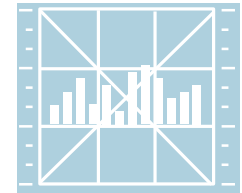
Minimum communication channels



Maximum time to respond



Transparency of the process



Reporting

**...some regulators handle complaints themselves.**

**Digital technology can strengthen complaints handling and dispute resolution by:**

Improving access

Streamlining process

Improving fairness

# Using technology to deal with complaints and inquiries in Mexico



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Cuenta oficial de la Comisión Nacional para la Protección y Defensa de los Usuarios de Servicios Financieros  
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Follow  
4,685 TWEETS  
3,026 FOLLOWING  
15,539 FOLLOWERS

Follow Condusef.Mx

Full name  
Email  
Password  
Sign up

Tweets

Following  
Followers  
Favorites  
Lists  
Recent images

**Condusef.Mx** @CondusefMX 18h  
Penetración de tarjetas de débito. México tuvo 45° lugar de 62

**Condusef Mx** @CondusefMX Oct 24  
The top priority of the Basic Accounts is to permit that more people have access to financial services  
Collapse Reply Retweet Favorite

1 RETWEET

3:52 PM - 24 Oct 12 · Details

**Roger** @el\_moles Oct 24  
@CondusefMX Can a bank refuse to open a Basic Account arguing that they don't offer that product?  
Collapse Reply Retweet Favorite

3:56 PM - 24 Oct 12 · Details

# We do not know whether digital channels attract more fraud, but they create vulnerabilities:



Rapidity and volume of transactions



Anonymity (and lack of IDs)



Channels for remote communication



Ease of cross-border transactions



Inexperienced customers (and agents)



# And these vulnerabilities are being exploited by criminals



## The most common types of fraud and scams are:

- Losing money because PIN was stolen
- An SMS scam
- An agent taking extra money

## Percentage who have lost money to a fraud or scam

12%

GHANA

17%

TANZANIA

17%

PHILIPPINES

## 3 types of fraudulent activities in digital finance

Targeting customers

Targeting agents

Insider fraud

# Data is the oil of digital economy, but what do people think about data protection and privacy?





Regulators have different approaches to the protection of privacy. Many rely on consent and proportionality.

# In reality, legal requirements can be translated into a variety of legalese:



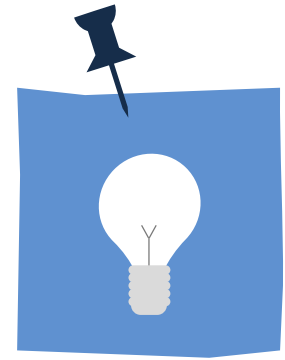
“you appoint [FIRM] as your attorney-in-fact and agent, to access third party sites, retrieve and use your information with the full power and authority to do and perform each thing necessary in connection with such activities, as you could do in person.”

“automatically collect call list, SMS, contact list, Facebook friends from the user's device, among other sources”

“may disclose data in the public interest”

“monitor and record SMS data as required for business purposes permitted by law”

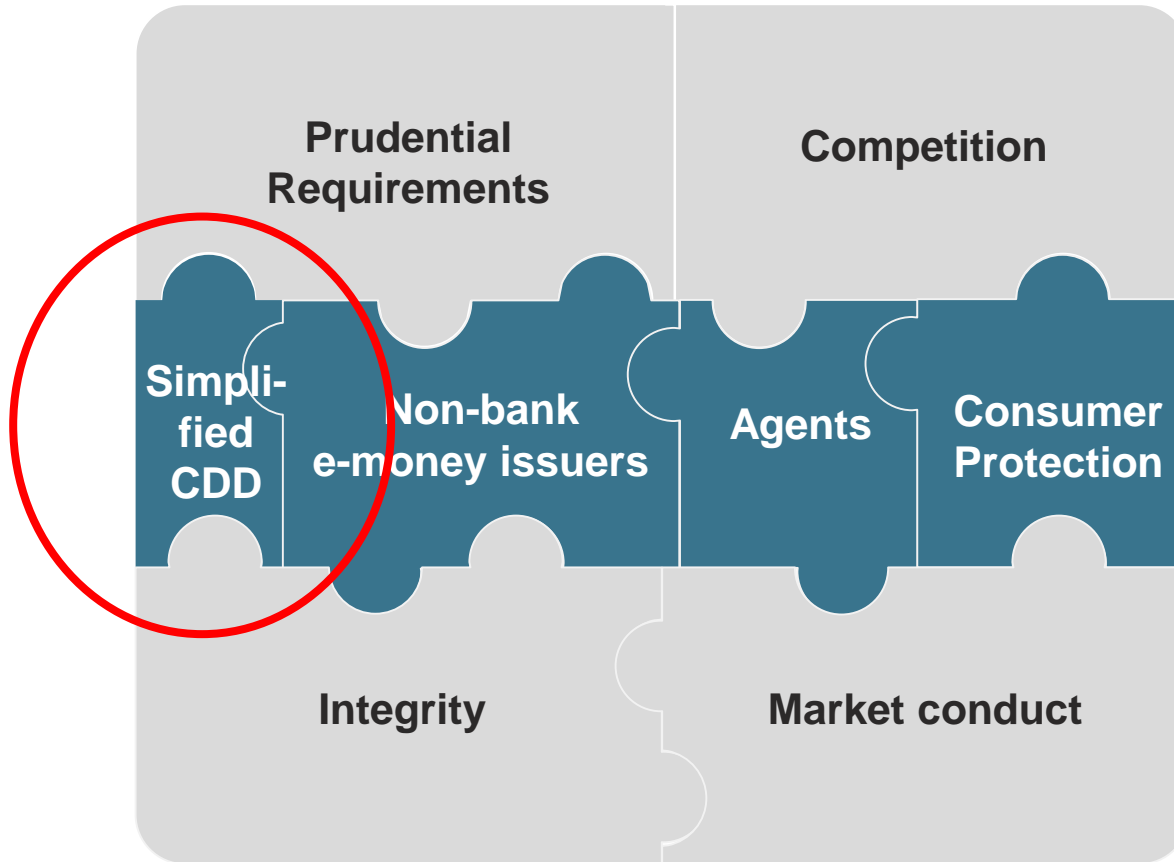
# Key Points to Remember



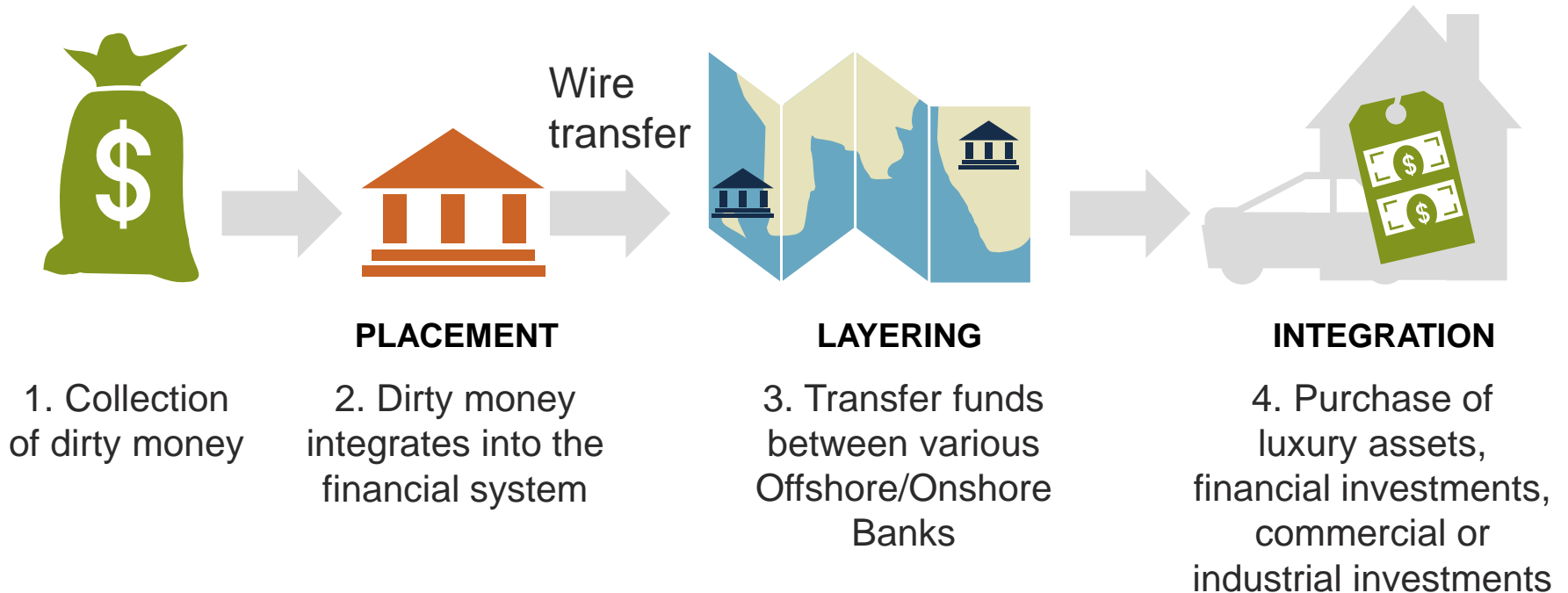
An objective of financial consumer protection regulation is to empower consumers to use more and better financial services

DFS raises unique consumer protection issues, especially due to multiple channels, products and actors

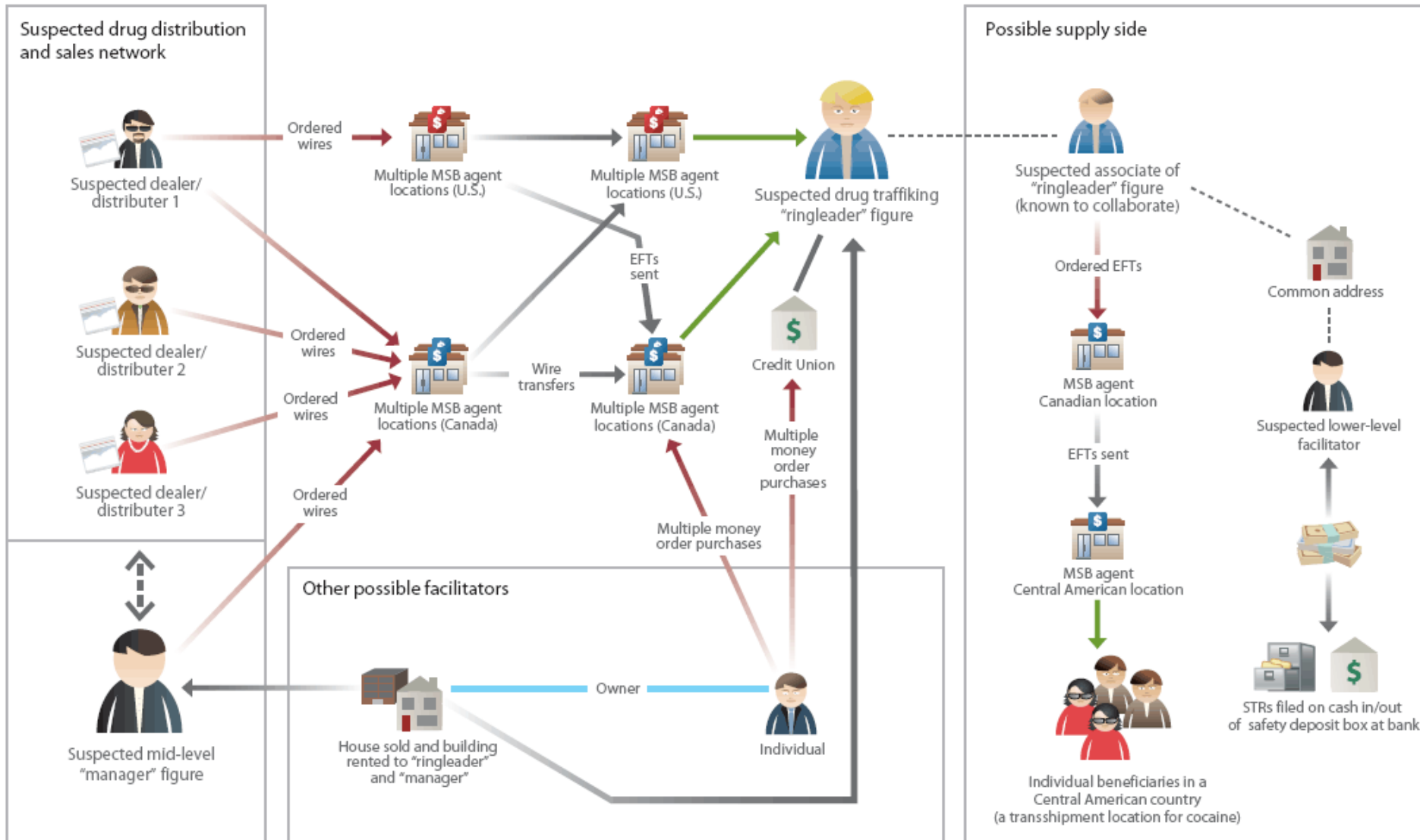
Technology offers new ways to deal with traditional financial consumer protection issues



# 3 steps to launder money



# Example of a money laundering scheme





Internationally, the AML/CFT standards are set in Financial Action Task Force's Recommendations



The recommendations and their transposition apply to financial institutions, defined on basis of **activities**

# Standard Customer Due Diligence (CDD) covers:

Identification and verification of customer's identity

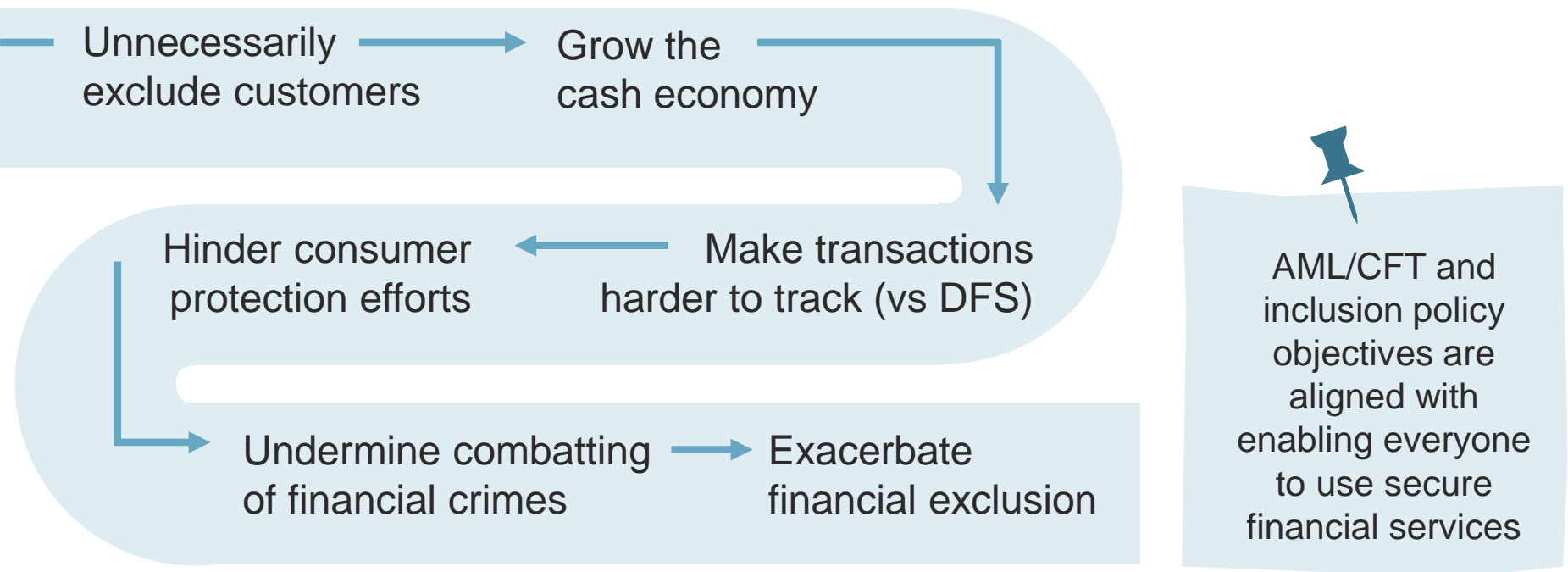
Identification of beneficial owner



Identification of politically-exposed person

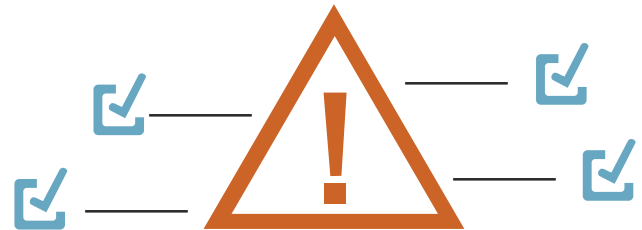
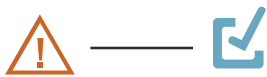
Monitoring of transactions and ongoing due diligence + reporting

# If implemented too restrictively, the rules may jeopardize financial inclusion



# A risk-based approach to anti money laundering/counter terrorist financing requirements helps balancing financial inclusion efforts

Regulators may lower requirements where risks are lower and raise them where risks are higher.



There are four levels of risk:



Proven low risk – Lower – Standard – Higher risk

# Simplified CDD reduces the compliance burden proportionally to the identified risks

Standard CDD elements are still present, but simplified

## Example of simplified KYC in Mexico: Tiered approach

### SIMPLIFIED REQUIREMENTS

full name  
address  
state  
date of birth  
gender



Only information,  
no physical copies



Opened at branch, banking agent  
or electronically

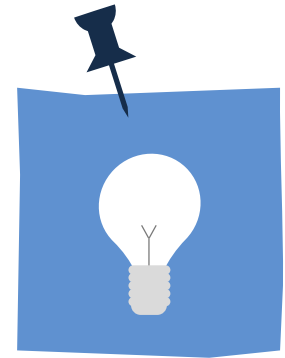
### TRANSACTION RESTRICTIONS

Monthly deposits < ~US\$1,150  
remote accts., unverified data < ~\$575  
G2P cash transfer accts. < ~\$2,300

No international transfers with countries:

- with no/inefficient AML/CFT measures
- with preferential tax regimes
- that are high risk

# Key Points to Remember



Regulators and providers must assess relevant ML/FT risks and design appropriate and proportional measures to address them.

Inadequate controls may allow criminal abuse while over-designed controls may undermine inclusion and integrity.

In improving efficiency of AML/CFT rules, quality and ubiquity of ID system plays an important role and so does digital technology (e.g., eKYC).

# Coffee Break



# Group Exercise

Welcome to the Inclusive Republic

# Inclusive Republic – a mythical country where everything revolves around digital financial services

**Through this group exercise**, you will experience the concept of basic regulatory enablers presented earlier.

**You will represent:**



PROVIDERS



CONSUMERS



REGULATORS  
OR SUPERVISORS

You will receive specific information relevant to your specific stakeholder group. While conducting the exercise, please keep in mind that you should act in the best interest of the stakeholder group you represent – regulators/supervisors, providers, customers – unless instructed otherwise. If answering any of the asked questions requires, in your opinion, any further assumption beyond the information provided in background materials, please make the assumption part of your answer.

# Information about Inclusive Republic

Inclusive Republic is a country of 47 million. In 2015, a majority of citizens (around 80%) lived in rural areas as they worked mostly in agriculture and small-scale manufacturing.



54% of agricultural workers are women, but only 29% of those are earning a formal wage.

The average per capita income per annum is 240,000 Includollars (ICD), equivalent to US\$1,200.

$$\left[ \$ \right] = \left[ \text{BDD} \right]$$

1                      200

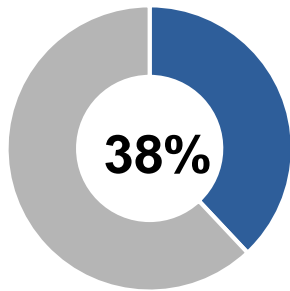
English is an official language but there are 3 other official languages; as well as numerous dialects.



Gender-wise, the population is almost equally distributed (51% of women); age-wise the largest group consists of people between 15 and 35.

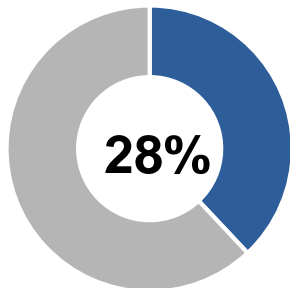
# Information about Inclusive Republic

Although the level of financial inclusion has been growing recently, it remains low across all sectors of the financial market, particularly in rural areas.



**Financial Inclusion Rate** or the percentage of the adult population with basic financial products or services\* provided within the formal financial sector.

\*Examples of basic financial products are considered: current account, a savings account, an m-wallet, a personal loan



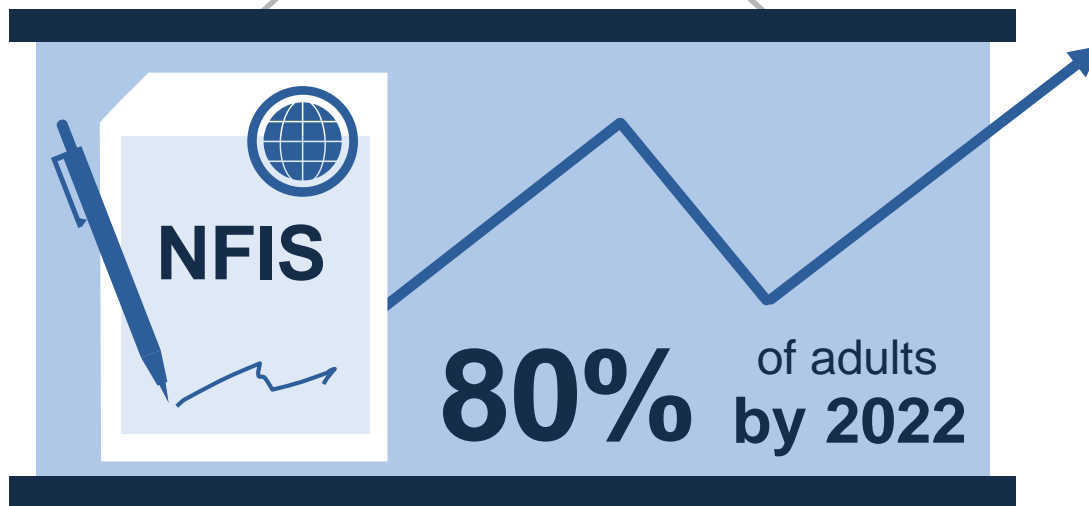
**The number of customers**† who use at least one financial product/service, monthly.

†Customers may be individuals or micro, small and medium enterprises

# Information about Inclusive Republic

To address the issue of low financial inclusion, the national government adopted a **National Financial Inclusion Strategy (the NFIS)**.

The NFIS sets the financial inclusion target of 80% adults (older than 15 years) by 2022



The NFIS mentions innovations in financial sector and technological advancements as one of the key contributing factors to higher financial inclusion in the future.

Some future projections commissioned by the Government show the expectation that, within 2 years, another 30% of the adult population are likely to have access to a formal transactional account.

# Information about the market

There are 18 banks in Inclusive Republic (16 private and 2 government-owned). The government-owned banks operate exclusively in disadvantaged regions.



The financial sector is dominated by 5 large private commercial banks, which manage 72% of the total financial assets.

There is a very limited price competition among the larger banks.

# Information about the market



Regulated non-bank financial institutions are represented by 20 non-deposit taking microfinance institutions, and 50 savings and credit cooperatives.



There are also thousands of semi-formal institutions (e.g. pawn shops) and informal credit providers (money lenders).



The insurance market has been growing recently with new products (mostly retail auto, property insurance lines, and also including microinsurance for farmers), but the insurance penetration ratio is only 0.9% of the adult population.



Pensions are dominated by a state-guaranteed pension fund. The capital market remains underdeveloped.

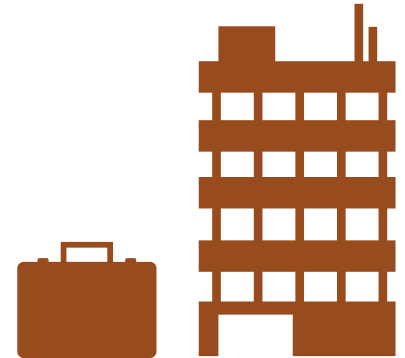
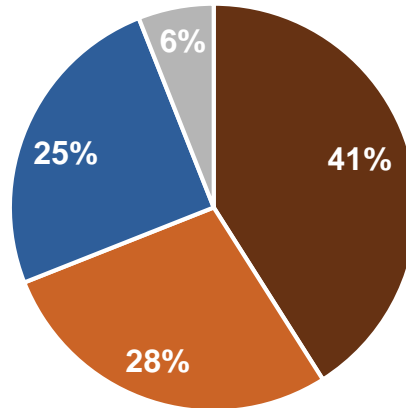
# Information about the market

In terms of targeted customer segments, the financial sector is mainly focused on serving mid-sized firms and large corporations.

For illustration, the consumer loans and mortgages together account for 25% of the total value of loans in the regulated financial sector...

...and the rest is corporate (41%), small to medium enterprises SME (28%) and other categories of loans (6%).

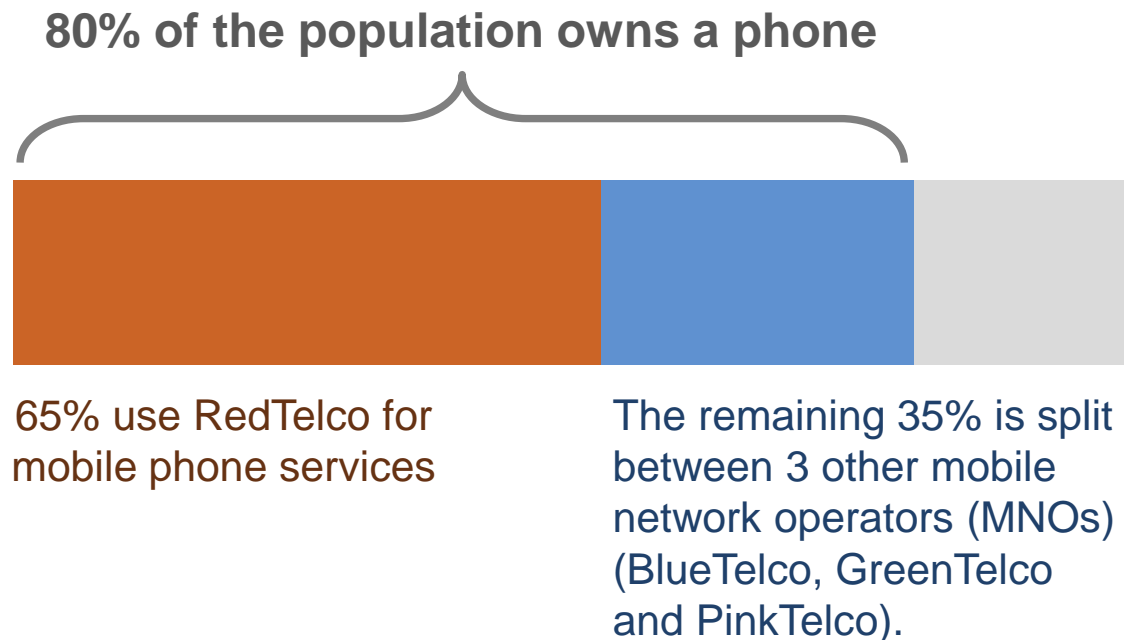
■ Corporate ■ SME ■ Consumer ■ Other





# Information about the market

The long-neglected retail financial sector has been eyed by mobile network operators – RedTelco and its competitors.



# Institutional Arrangements for Regulation and Supervision

The financial market is regulated and supervised primarily by the following five entities:

- **The Central Bank of Inclusive Republic (CBB)** is responsible for financial stability and manages monetary policy in Inclusive Republic. CBB also supervises all banks and non-bank financial institutions (e.g. MFIs, cooperatives) and, (pursuant to the Payments Act) regulates and oversees the national payment system. CBB has Payments Department which is separate from the departments supervising banks and non-bank financial institutions;
- **The Securities and Exchange Commission (SEC)** is responsible for capital market participants;
- **The Insurance Authority (IA)** is responsible for insurance companies and intermediaries;
- **The Ministry of Finance (MoF)** has the responsibility for policymaking, regulatory and supervisory powers over pensions, and houses Financial Intelligence Unit; and
- **The Deposit Insurance Fund (DIF)** that provides deposit insurance protection up to an equivalent of US\$ 500 per depositor at a bank, and has resolution powers over banks and non-bank financial institutions.

# Institutional Arrangements for Regulation and Supervision

The five financial sector supervisors have responsibility for both prudential and market conduct supervision. There are also other agencies with potential say in the supervision of financial service providers:

- **the Competition Authority (CA)** promotes fair competition and protects consumers of all goods and services; and
- **the National Telecommunication Authority (NTA)** licenses mobile carriers and Internet providers.

# Complaint: the back story



You represent a party in a dispute between a customer and a financial service provider. Based on the information provided, formulate your position and get ready for hearing. After the hearing and resolution of the dispute, let's collectively discuss policy interventions that could address some of the issues revealed by this complaint.



# Train-the-Trainer

Bringing knowledge home

# Scenarios

## Examples

- Regulator / Supervisor
  - Training colleagues
  - Developing a strategy
  - Drafting a policy
  - Managing stakeholders
- International Organization / NGO
  - Internal training
  - Technical assistance delivered to clients
  - Stakeholder management
- Private firm (FSP / consulting)
  - Internal training
  - Capacity building delivered to clients

# Complementing Knowledge Products

4 levels of knowledge

1. Youngling
2. Padawan
3. Knight
4. (Jedi) Master

# 4 Levels of Knowledge

Youngling

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Knight

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# 4 Levels of Knowledge

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# 4 Levels of Knowledge

Master

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# Conclusion

Q&A / Debrief

# Thank you

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