

TOOLKIT: RESPONSIBLE CASH

Examples of regulatory innovation for enhanced digital and financial inclusion



Need some inspiration?

EXAMPLE 1: Jordan's: How tiered KYC expanded financial access for refugees

<u>Challenge:</u> Syrian refugees living in Jordan did not have access to formal ID therefore they couldn't access formal financial services.

Solution: Since 2015, the MoI (Ministry of Interior) has invested in biometric identification cards as official identification for refugees registered with UNHCR, enabling access to essential services.

Impact: Regulatory reforms improved impact by:

- Financial access Mol cards allowed refugees to use mobile payments (JoMoPay) and digital wallets.
- Simplifying KYC requirements Regulations allowed onboarding with just an MoI card, reducing documentation barriers.
- Facilitating biometric verification Refugees could access humanitarian assistance via iris-scanning
 ATMs instead of PINs or cards. NB: Biometrics are sensitive data and should only be used where necessary
 and appropriate.
- Enhancing service access Mol cards also enabled access to healthcare, education, jobs, and mobility.

<u>Key takeaway:</u> The Mol cards were the result of a successful collaboration between UNHCR and the government of Jordan. Allowing the use of Mol cards as functional IDs, and other use cases of the Mol card led to broader refugee inclusion.

Learn more about the project: KYC Innovations, Financial Inclusion and Integrity In Selected AFI Member Countries p.46-50.

EXAMPLE 2: Wizall Senegal – Lighter/simplified KYC boosts women's financial inclusion

<u>Challenge:</u> Many women in Senegal face barriers to accessing financial services due to strict KYC requirements, which demand identification documents they often don't have.

<u>Solution:</u> Wizall, a fintech company, introduced **lighter KYC requirements for their remittance services e-wallet**, reducing the levels of initial authentication and documentation needed for onboarding. *NB: Regulators can promote this!*

<u>Impact:</u> This change led to a significant increase in women's financial participation rising from **20% to 56%**, allowing more women to access digital financial services.

<u>Key takeaway:</u> Simplified KYC processes can **drive financial inclusion**, especially for women, by removing documentation barriers.

Learn more about this UNCDF project: Switching From Cash to Digital Remittances, Research Insights From Wizall Money in Senegal



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EXAMPLE 3: Community verification as a form of functional ID in Somalia

<u>Challenge:</u> When formal banking services were suspended during the COVID pandemic, WFP started to provide Somali families with mobile money transfers under the Ministry of Labour and Social Affairs' shock-responsive Safety Net for Human Capital Project. However, many women – who were selected as primary recipients for the programme - did not have their own SIM card or mobile phone and could not register a new account due to the lack of ID.

<u>Solution:</u> WFP Somalia advocated with regulators to enable women to open accounts with lower KYC requirements and worked with local leaders to allow community members to verify identity and residency. <u>Impact:</u> This advocacy enabled 100,000 women to obtain their own SIM cards and receive social assistance payments via mobile money.

<u>Key takeaway:</u> Collaborating with regulators and jointly advocating with community leaders and mobile money providers, helped find a win-win solution that allowed the government to continue to provide social assistance. Read more about the project <u>here</u>.

You may also want to read this report from AFI with more examples on <u>KYC innovation</u> and AFI's <u>report on advancing</u> <u>financial integrity of forcibly displaced.</u>

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EXAMPLE 4: Strengthening Customer Protection in Nigeria

<u>Challenge:</u> The Central Bank of Nigeria (CBN) identified gaps in protecting financial consumers due to inconsistent risk management, unresolved complaints, and regulatory breaches among financial institutions.

<u>Solution:</u> In 2023, CBN introduced a **Market Risk-Based Supervision Framework** with an Impact Assessment Template to evaluate financial institutions based on: 1) Market presence & influence; 2) Volume of unresolved complaints; 3) Compliance breaches; 4) Fines imposed; 5) Proportionality & supervisory history. Additionally, the <u>Consumer Protection Framework (2016)</u> provided clear redress mechanisms, while the Nigeria Electronic Fraud Forum (2015) mandated 24-hour anti-fraud desks. The CBN online complaint system and <u>e-learning portal further strengthened financial literacy and fraud prevention.</u> In 2024, the CBN also prioritized working with key stakeholders to <u>develop tailored financial products and accessible services for persons with disabilities.</u>

<u>Impact/takeaway:</u> These initiatives led to stronger oversight through structured supervision of financial service providers, better compliance with stricter enforcement, as well as greater consumer confidence via clear redress options. It also led to higher industry accountability with transparent assessments and reduced fraud through anti-fraud desks and awareness campaigns.

For more examples on regulatory innovation in Customer Protection, read the AFI report here.

EXAMPLE 5: Laying down Digital Public Infrastructure in Haiti

<u>Challenge:</u> Haiti's disadvantaged populations, particularly women, faced significant barriers in accessing financial services. Limited network coverage, lack of trust in financial institutions, and absence of national identification documents restricted their ability to receive social assistance digitally.

<u>Solution:</u> WFP worked with the Haitian government and partners to build digital infrastructure that ensures secure and efficient Government-to-Person (G2P) payments. WFP partnered with the government to expand digital payments, advocate for biometric ID distribution, improve mobile money access, and link social registries with financial providers. WFP supported the development of a national social registry that integrates vulnerability data, helping the government better direct assistance to those in need.

<u>Impact:</u> This allowed to verify peoples' identities, seamlessly exchange data, and receive social protection payments safely and on time. By March 2023, digital cash transfers increased from 3% to 60%. Women, who made up 66% of recipients, gained greater financial autonomy. The initiative also facilitated access to essential services, such as voting and healthcare, fostering long-term economic empowerment. Emergency funds were delivered faster during crises.

<u>Key takeaway:</u> Investing in public digital infrastructure enhanced financial inclusion. Collective efforts and advocacy transformed the adaptive social protection system in Haiti.

Learn more about the project here.

EXAMPLE 6: Bringing regulators closer: How field missions led to more female agents in Uganda

<u>Challenge:</u> The Central Bank of Uganda had limited understanding of the challenges disadvantaged groups, including refugees and women, faced in accessing (digital) financial services. Strict agent banking requirements created barriers to financial inclusion.

Solution: WFP Uganda and the Cash Working Group engaged proactively with the central bank, inviting them on field missions to Nakivale refugee settlement, events and discussions to witness challenges firsthand.

<u>Impact:</u> This direct exposure led to the simplification of agent requirements, increasing opportunities for refugees - especially women - to become agents, improve livelihoods, and enhance female agent participation, making financial services more accessible to women.

<u>Key takeaway:</u> Elevating people's voices through **engaging regulators through real-world exposure** to challenges can drive policy changes that improve financial inclusion, creating economic opportunities for marginalized communities. Read more about the project <u>here</u>.