

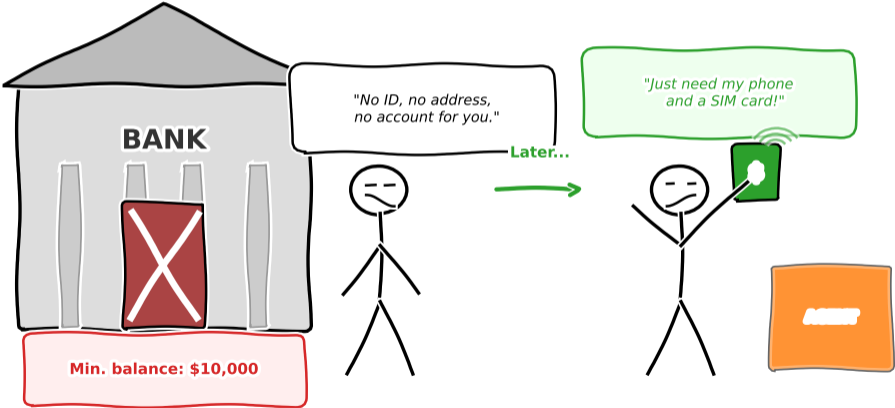
Lesson 2.1: Financial Exclusion

Module 2: The Access Problem

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Digital Finance — BSc Course

When the Bank Says "No"



The bank said no. The phone said yes.

After completing this lesson, you will be able to:

- 1 **Define** financial inclusion and financial exclusion and distinguish voluntary from involuntary exclusion [Understand]
- 2 **Classify** the root causes of exclusion using an economic taxonomy (supply-side, demand-side, structural) [Understand]
- 3 **Explain** how information asymmetry and adverse selection lock out low-income populations [Analyze]
- 4 **Describe** mobile money and agent banking as technology-driven solutions [Apply]
- 5 **Compare** tiered KYC frameworks and their trade-offs between access and compliance [Analyze]
- 6 **Evaluate** regulatory sandboxes as instruments for expanding financial access [Evaluate]

Bloom's levels covered: Understand, Apply, Analyze, Evaluate

Objectives follow Bloom's taxonomy: Understand → Apply → Analyze → Evaluate.

Module 1 showed us the Cost Problem:

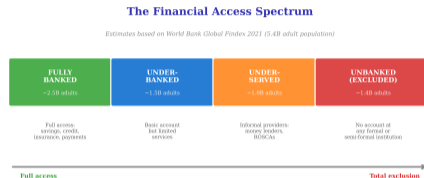
- Payments involve 5–7 intermediaries, each extracting a fee
- Cross-border transfers cost 3%–7%
- Small-ticket transactions are disproportionately expensive

Module 2 asks a harder question:

- What happens to those who **cannot afford** even the cheapest service?
- What happens to those whom banks **refuse to serve**?
- Cost is a barrier — but it is not the only one

Teaching sequence: M1 Cost → M2 Access (here) → M6 Infrastructure next.

Module 1 showed costs. Now we ask: what happens to those who can't afford them?



The access spectrum runs from fully banked to completely excluded.

What Is Financial Exclusion?

Definition: Financial Exclusion

Financial exclusion is the inability of individuals or groups to access basic financial services — savings accounts, credit, insurance, and payment systems — on terms that are affordable, appropriate, and dignified.

Two distinct categories:

- **Voluntary exclusion:** Individuals who *choose* not to use formal services (e.g., religious reasons, distrust, cultural norms)
- **Involuntary exclusion:** Individuals who *want* services but **cannot obtain them** due to cost, documentation, geography, or discrimination

Policy focus: Involuntary exclusion is the central challenge — it represents a **market failure** where willing participants are denied access.

Financial exclusion is not just about bank accounts — it includes credit, insurance, savings, and payment access.

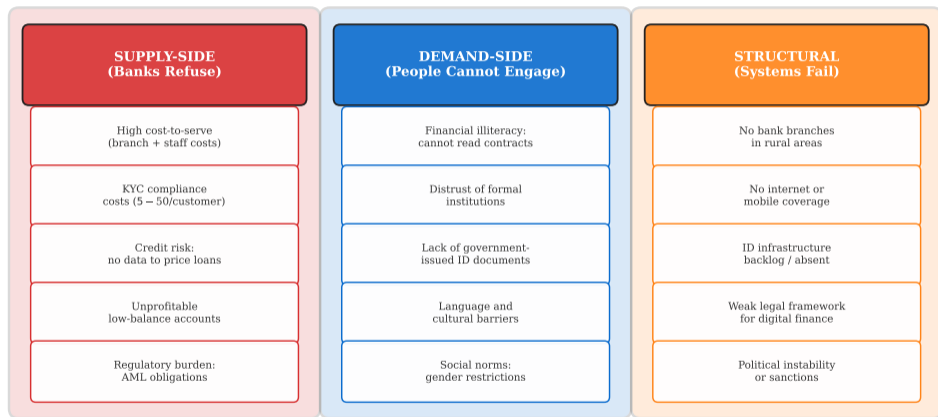
Global Financial Inclusion Data (World Bank Findex 2021):

Indicator		Value	Source
Adults without a bank account (global)	1.4B unbanked adults	(<i>World Bank Global Findex 2024, 2024</i>)	Findex
Unbanked adults in developing economies		1.3 billion	Findex
Women unbanked (developing economies)		740 million	Findex
Adults who received digital payments		57%	Findex
Adults who saved at a financial institution		28%	Findex
Mobile money accounts (Sub-Saharan Africa)		33% of adults	GSMA

Key insight: Financial exclusion is concentrated — 50% of unbanked adults live in just 7 countries: Bangladesh, China, India, Indonesia, Mexico, Nigeria, and Pakistan.

Data from the World Bank Global Findex Database 2021, the most comprehensive survey of financial access worldwide.

Causes of Financial Exclusion



Financial exclusion arises from the intersection of all three barrier categories.

- **What you see:** Three vertical categories with 5 specific barriers each
- **Key pattern:** Supply barriers (red) are bank-driven; demand barriers (blue) are customer constraints; structural (orange) are

Supply-Side Barriers: Why Banks Refuse

Banks are profit-maximizing firms. Serving the poor is often unprofitable:

Barrier	Economic Mechanism
High cost-to-serve	Opening, maintaining, and supporting a low-balance account costs the bank more than the revenue it generates
KYC compliance costs	Identity verification for customers without official documents is expensive and legally risky
Credit risk	Without credit history, the bank cannot price loans — leading to either refusal or prohibitive rates
Branch economics	Rural areas lack the population density to justify a physical branch
Regulatory burden	Anti-money-laundering (AML) obligations make serving unidentified customers legally risky

Result: Banks rationally exclude customers whose expected lifetime value is below the cost of service.

Supply-side exclusion is a rational business decision — which is precisely why market intervention is needed.

Definition: Adverse Selection in Lending

Adverse selection occurs when lenders cannot distinguish between high-risk and low-risk borrowers. Without information (credit history, income verification), lenders either **refuse all applicants** from a group or **charge all of them the high-risk rate**.

The exclusion spiral:

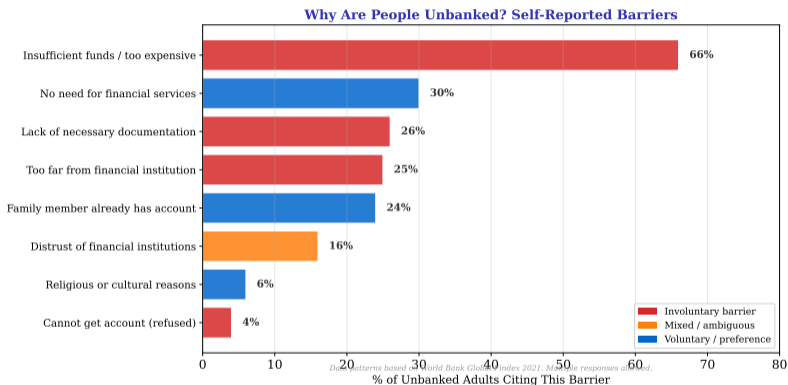
- 1 Person has no bank account → no transaction history
- 2 No transaction history → no credit score
- 3 No credit score → bank cannot assess risk
- 4 Bank cannot assess risk → loan denied or priced at 30%+ APR
- 5 Person cannot access affordable credit → stays in informal economy
- 6 Stays in informal economy → no bank account (return to step 1)

This is a poverty trap: The lack of data *causes* exclusion, and exclusion *prevents* data generation.

Adverse selection creates a vicious cycle: no data → no access → no data. Breaking this cycle is the central challenge.

Demand-Side Barriers: Why People Cannot Engage

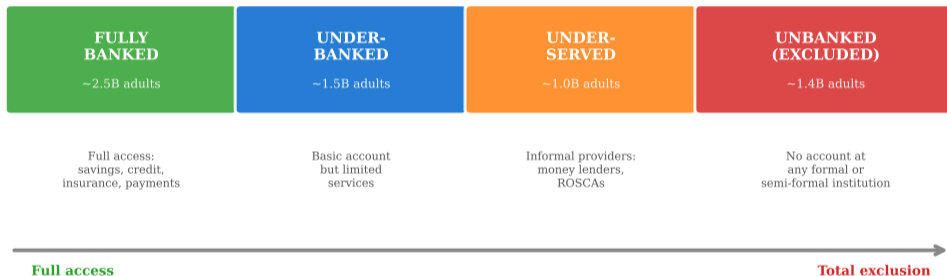
Even when banks are willing, customers face their own barriers:



- **Financial literacy:** Understanding interest rates, fees, and contract terms
- **Trust:** Historical exploitation by formal institutions
- **Documentation:** Millions lack government-issued ID
- **Geography:** The nearest bank branch may be hours away

The Financial Access Spectrum

Estimates based on World Bank Global Findex 2021 (5.4B adult population)



Key distinctions:

- **Fully banked:** Access to savings, credit, insurance, payments via formal institution
- **Underbanked:** Has a basic account but lacks access to credit, insurance, or full digital services
- **Underserved:** Uses informal or semi-formal providers (money lenders, savings groups)
- **Unbanked:** No account at any formal or semi-formal institution

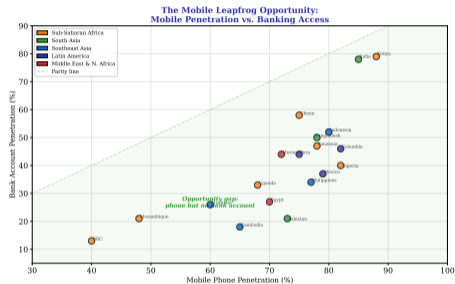
The Mobile Leapfrog Opportunity

The asymmetry that changes everything:

- Of the 1.4 billion unbanked adults, approximately **1 billion** have access to a mobile phone
- Mobile network coverage exceeds bank branch coverage in nearly every developing country
- A basic feature phone (not a smartphone) is sufficient for mobile money

This creates a leapfrog path:

- Skip the bank branch entirely
- Deliver financial services over existing mobile infrastructure
- Use the mobile phone as both **identity** and **access channel**



Mobile penetration far outpaces banking infrastructure in developing economies.

Mobile phones are the single most important technology for financial inclusion — they bypass the need for bank branches entirely.

Definition: Mobile Money

Mobile money is a financial service that allows users to store, send, and receive money using a mobile phone, without requiring a traditional bank account. It is operated by mobile network operators (MNOs) or licensed financial institutions through a network of physical agents.

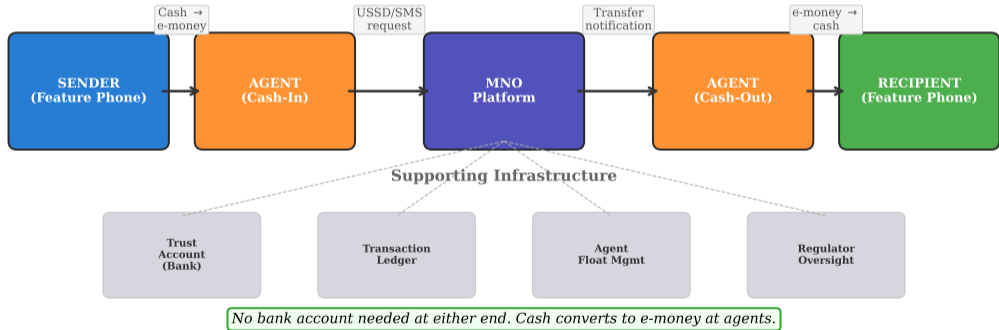
Key characteristics:

- **No bank account required:** Only a SIM card and basic phone
- **Agent network:** Cash-in / cash-out through local shops (agents) instead of bank branches
- **Unstructured Supplementary Service Data (USSD) or SMS interface:** Works on basic feature phones, no internet needed
- **Stored value:** Money is held in a digital wallet linked to the phone number
- **Regulation:** Typically licensed as an e-money issuer, not a bank

Scale: Over 1.75 billion registered mobile money accounts globally (GSMA, 2023), processing over \$1.26 trillion annually.

Mobile money is not mobile banking — it is a separate system designed for the unbanked, operating outside the traditional banking system.

Mobile Money Architecture



- **What you see:** 5 entities (sender, agent, MNO platform, agent, recipient) with arrows showing cash-to-e-money conversion

Definition: Agent Banking

Agent banking uses third-party retail outlets (shops, pharmacies, petrol stations) as authorized points for cash-in, cash-out, and basic banking transactions. Agents replace bank branches in areas where branches are not economically viable.

Agent economics:

- Agent earns a small commission per transaction (typically 0.3%–1.0%)
- Agent provides **liquidity**: holds both cash and e-money float
- **Trust**: Agents are local, known community members
- **Cost**: 5–10× cheaper than operating a bank branch



Agents form a decentralized network that converts between cash and digital value.

Agent banking solves the last-mile problem: reaching customers where they live, not where banks choose to build.

M-Pesa (launched 2007) is the canonical example of mobile money:

Feature	Detail
Operator	Safaricom (mobile network operator)
Country	Kenya (expanded to Tanzania, Mozambique, DRC, Ghana, Egypt, India)
Registered users	51 million+ across all markets (2023)
Agents	600,000+ active agents
Services	P2P transfer, bill pay, savings (M-Shwari), credit (KCB M-Pesa), insurance
Transaction volume	Over \$314 billion per year (2023)
Account opening	SIM card + national ID (no bank account, no credit check)

Impact: M-Pesa lifted an estimated 2% of Kenyan households out of extreme poverty (Suri & Jack, 2016, *Science*).

M-Pesa proved that a mobile network operator can deliver banking services more effectively than banks in underserved markets.

Success factors specific to Kenya:

- 1 **Dominant MNO:** Safaricom had 80%+ market share — instant network effects
- 2 **Agent network density:** Agents outnumber bank branches 100:1
- 3 **Regulatory enablement:** Central Bank of Kenya issued a “letter of no objection,” allowing Safaricom to operate without a full banking license
- 4 **Unmet demand:** Only 26% of Kenyans had a bank account in 2006
- 5 **Urban-to-rural remittances:** Killer use case — workers in Nairobi sending money home

Why replication often failed:

- **Nigeria:** Central bank required bank-led model, limiting MNO participation — reversed in 2018 with PSB licenses for MTN Momo, Airtel Smart Cash (*CBN Payment Service Banks guidelines, 2022*)
- **India:** Fragmented telecom market, no single dominant operator
- **South Africa:** High existing bank penetration reduced demand

Mobile money success depends on regulation, market structure, agent networks, and unmet demand — not technology alone.

Definition: Know Your Customer (KYC)

Know Your Customer (KYC) is the regulatory requirement for financial institutions to verify the identity of their customers before providing services. Standard KYC requires government-issued photo ID, proof of address, and sometimes biometric data.

The paradox of KYC and inclusion:

- KYC exists to prevent money laundering, terrorism financing, and fraud
- But **850 million people** worldwide lack any form of official identification (World Bank ID4D)
- Without ID, KYC requirements **automatically exclude** the most vulnerable
- The cost of full KYC per customer (\$5–\$50) exceeds the revenue from a low-balance account

Tension: Anti-money-laundering rules designed to protect the financial system simultaneously **lock out** the people who need it most.

KYC is a necessary safeguard, but its one-size-fits-all design creates a barrier for the undocumented and the poor.

Tiered KYC: Proportional Identity Verification

Tiered KYC: Balancing Access and Compliance

TIER 1 Basic	TIER 2 Standard	TIER 3 Full	
Phone number + name only	National ID or biometric	Full ID + proof of address	ID Required
50 – 200	500 – 2,000	Unlimited	Balance Limit
\$50/day	\$500/day	Unlimited	Daily Tx Limit
P2P transfer Bill payment	+ Savings + Micro-credit	+ Loans + Insurance + International	Services
< \$1	2 – 10	10 – 50	KYC Cost
LOW	MEDIUM	HIGH	AML Risk Level

More access
Less verification

More services
More verification

- **What you see:** Three tiers (green/blue/purple) with rows showing ID requirements, limits, services, costs, and risk levels

Feature	Tier 1 (Basic)	Tier 2 (Standard)	Tier 3 (Full)
ID required	Phone number + name	National ID or biometric	Full ID + proof of address
Balance limit	\$50–\$200	\$500–\$2,000	Unlimited
Transaction limit	\$50/day	\$500/day	Unlimited
Services	P2P transfer, bill pay	+ savings, micro-credit	+ loans, insurance, international
Verification cost	<\$1	\$2–\$10	\$10–\$50
Example countries	Ghana, Nigeria, Tanzania	Kenya, India, Philippines	EU, US, UK

Risk-based approach: A \$50 mobile money account poses minimal money-laundering risk and should not require the same documentation as a \$50,000 bank account.

Tiered KYC is recommended by the Financial Action Task Force (FATF) as a risk-proportionate approach to inclusion.

Definition: Digital Identity

A **digital identity** is a set of electronically stored attributes (biometrics, phone number, transaction history) that uniquely identifies a person and can be used to authenticate them for financial services — without requiring traditional paper documents.

Digital identity systems for inclusion:

- **India's Aadhaar:** 1.3 billion biometric IDs; enables instant electronic Know Your Customer (e-KYC) for bank accounts
- **Pakistan's Raast:** Digital payment system linked to national ID (NADRA)
- **Estonia's e-Residency:** Digital identity for cross-border business and banking
- **Biometric SIM registration:** Fingerprint-linked SIM cards serve as de facto ID

Impact of Aadhaar: India added 500 million bank accounts between 2011 and 2021, largely through Aadhaar-enabled e-KYC.

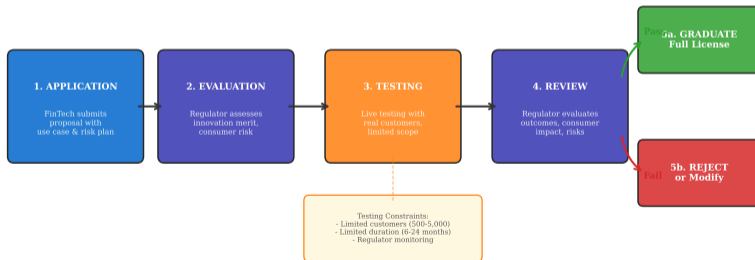
Digital identity is the missing link: it gives the undocumented a way to prove who they are to the financial system.

Definition: Regulatory Sandbox

A **regulatory sandbox** is a controlled environment in which financial innovators can test new products and services under relaxed regulatory requirements, with oversight from the regulator, for a limited time and with a limited number of customers.

Regulatory Sandbox Lifecycle

Principle: Observe innovation before regulating it. Test with safeguards, then decide.



- **What you see:** 5-stage process (application → evaluation → testing → review → graduate/reject) with testing constraints box

Country	Regulator	Inclusion-Relevant Outcomes
UK	FCA (2016)	Tested 5 mobile-only banking apps; 3 received full licenses
Kenya	CBK (2007)	M-Pesa “letter of no objection” — precursor to formal sandbox
Singapore	MAS (2016)	Tested cross-border mobile payments for migrant workers
India	RBI (2019)	Tested offline digital payments for rural areas without internet
Sierra Leone	BSL (2018)	Tested blockchain-based mobile money for farmers

Why sandboxes matter for inclusion:

- Allow **non-bank innovators** (telcos, fintechs) to enter financial services
- Reduce time-to-market from years to months
- Let regulators learn by observing, not guessing

Over 80 countries now operate financial regulatory sandboxes (World Bank, 2023).

The Informal Financial System

When formal finance is unavailable, people create alternatives:

Mechanism	How It Works	Limitations
Rotating Savings and Credit Association (ROSCA) / Chit funds	Rotating savings: each member contributes monthly; one member receives the pot each month	No insurance, no credit history, trust-dependent
Moneylenders	Informal cash loans at high interest (50%–300% APR)	Exploitative rates, no legal protection
Hawala (informal value transfer system) / Hundi	Value transfer via broker network without physical money movement	Unregulated, no record
Savings under mattress	Physical cash storage at home	Theft risk, zero return, no emergency liquidity

Key point: The excluded are not “unfinanced” — they use informal systems that are expensive, risky, and offer no legal protection.

Informal finance is not the absence of finance — it is finance without regulation, protection, or efficiency.

Women are disproportionately excluded:

- **740 million** unbanked women in developing economies (Findex 2021)
- The gender gap in account ownership: 6 percentage points in developing countries
- Women are 20% less likely to have a mobile money account in Sub-Saharan Africa

Structural causes of the gender gap:

- ① **Legal barriers:** In some jurisdictions, women need a male co-signer to open an account
- ② **Documentation:** Women are less likely to have government-issued ID
- ③ **Literacy:** Lower financial and digital literacy rates
- ④ **Social norms:** Household finances controlled by male family members
- ⑤ **Phone access:** Women in low-income households are less likely to own a phone

Policy lever: Designing products for women (agent proximity, voice interfaces, group savings) increases adoption.

Closing the gender gap in financial access could increase GDP by 2% in some developing economies (IMF, 2018).

Digital finance attacks each barrier simultaneously:

Barrier	Digital Solution	Example
Cost-to-serve	Automated, no branch needed	Mobile money
Geography	Service via phone, not branch	Agent banking
Documentation	Digital identity, tiered KYC	Aadhaar e-KYC
Credit history	Alternative data (phone usage, utility payments)	M-Shwari, Tala
Financial literacy	In-app guidance, nudges	Savings auto-deduct
Trust deficit	Peer-to-peer, community agents	Village savings apps

Result: Between 2011 and 2021, the share of adults with a financial account rose from 51% to 76% globally (Findex).

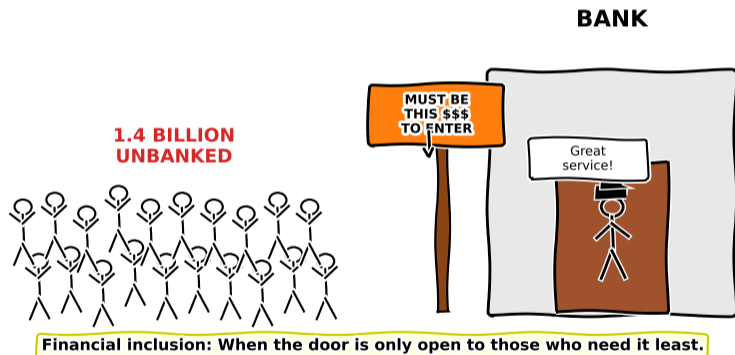
Digital finance does not just make services cheaper — it fundamentally redesigns who can be served and how.

Digital finance is not a silver bullet. Risks include:

- 1 **Digital divide:** Those without phones or connectivity remain excluded — the “last 10%” problem
- 2 **Over-indebtedness:** Easy digital credit has led to debt traps (Kenya, India)
- 3 **Data privacy:** Mobile money creates detailed transaction histories — who owns this data?
- 4 **Agent fraud:** Agents may charge unauthorized fees or steal customer PINs
- 5 **Network reliability:** USSD/SMS systems fail during outages; no offline fallback
- 6 **Predatory pricing:** Some mobile money providers charge extraction-level fees to captive users

Critical question: Is “digital inclusion” meaningful if it replaces one form of exclusion (no access) with another (exploitative access)?

Inclusion without consumer protection can be worse than exclusion — digital lending crises in Kenya illustrate this.



Sometimes the best way to remember a concept is to laugh about it.

- 1 **1.4 billion adults** are unbanked; exclusion is concentrated in 7 countries and disproportionately affects women
- 2 Exclusion has three root causes: **supply-side** (banks refuse), **demand-side** (people cannot engage), and **structural** (systems fail)
- 3 **Information asymmetry** and **adverse selection** create a poverty trap: no data → no access → no data
- 4 **Mobile money** (e.g., M-Pesa) proves that financial services can be delivered without bank branches or bank accounts
- 5 **Agent banking** solves the last-mile problem at 5–10× lower cost than branches
- 6 **Tiered KYC** balances anti-money-laundering compliance with access for the undocumented
- 7 **Regulatory sandboxes** enable innovation by relaxing rules under controlled conditions
- 8 **Digital identity** (Aadhaar, biometrics) is the foundational enabler of scalable inclusion

Financial exclusion is a solvable problem — but solutions must address supply, demand, and structural barriers simultaneously.

This lesson: We defined financial exclusion, mapped its causes through an economic taxonomy, and examined how mobile money, agent banking, tiered KYC, digital identity, and regulatory sandboxes address the access problem.

Key vocabulary:

- Financial inclusion / exclusion
- Voluntary vs. involuntary exclusion
- Information asymmetry
- Adverse selection
- Mobile money
- Agent banking
- Tiered KYC
- Regulatory sandbox
- Digital identity
- Unbanked / underbanked / underserved

Next lesson (M2L2): *The Digital Lending Revolution* — We examine how alternative data, machine learning credit scoring, and digital lending platforms are breaking the adverse selection cycle by creating credit histories for those who never had one.

Review: Can you explain why a profit-maximizing bank rationally excludes the poor, and name three digital solutions?

What happened

- Safaricom + Vodafone launched M-Pesa in Kenya March 2007 as SMS-based money transfer
- Within five years M-Pesa carried more transactions in Kenya than Western Union globally
- By 2024 M-Pesa serves more than 50 million customers across seven African markets
- Telco-led not bank-led: the agent network of small shopkeepers replaced bank branches
- Suptech-friendly: the platform reports to the Central Bank of Kenya in near real time

Why it matters here

- Empirical demonstration that financial inclusion can leapfrog brick-and-mortar branches
- Mobile-money as a primary payment rail (not just a remittance app) is the modal pattern across East Africa
- Contrasts with the Nigerian PSB licence (2018) where inclusion gains were slower

Full writeup: [v4/cases/case_M2_mpesa.md](#). Host: M2 L1 Financial Exclusion.

- Network effects: per-transaction value rises with each new agent and each new active account
- Distribution beats technology: the smartphone wave 2010 onwards did not displace M-Pesa's feature-phone install base
- Regulator-as-enabler: Central Bank of Kenya licensed a non-bank to issue e-money, ahead of most jurisdictions
- Suzuki and Jack 2014 (Science) showed M-Pesa reduced extreme poverty in 194,000 households

See also: **M2 L1 Financial Exclusion; full writeup at [v4/cases/case_M2_mpesa.md](#).**

Attempt these before turning the page.

- 1 [Understand] Describe the “adverse selection” mechanism by which thin-file customers are rationally excluded by profit-maximising banks.
- 2 [Apply] M-Pesa charges 1% per transaction. A Kenyan worker sends \$20 home weekly for 52 weeks. Compute annual transaction cost. Compare to a Western Union remittance at \$8 per transaction.
- 3 [Evaluate] Is mobile-money-led inclusion “real” access if it remains tethered to a single telco’s rails? Argue for or against with a specific criterion.

Solutions hidden unless `\solutionstrue` is set before compiling.