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The role of technological innovation in scaling up access to insurance and its regulatory challenges: a focus on m-insurance

Jeremy Leach Director

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A cautionary tale

Managing the risk whilst enabling innovation



m-insurance, insurance sold through and with mobile network operators, offers a strong value proposition for expanding micro-insurance



Massive scale and brand benefits

- In Kenya there are 6,000 insurance vs over 60,000 M-Pesa agents
- Telenor Pakistan- MicroEnsure were signing up ~6,000 clients a day



Lower distribution costs

 Embedded distribution through menu on SIM / cell phone or embedded models as insurers leverage MNO footprint



Lower cost of collections

 Collection addressed through mobile money, airtime, voucher models or MNO pays - embedded models.



Improved persistency (reduced churn) & risk management

• Communication, 'big data' and GIS tracking supports risk management.



Sharing of policy administration to reduce cost

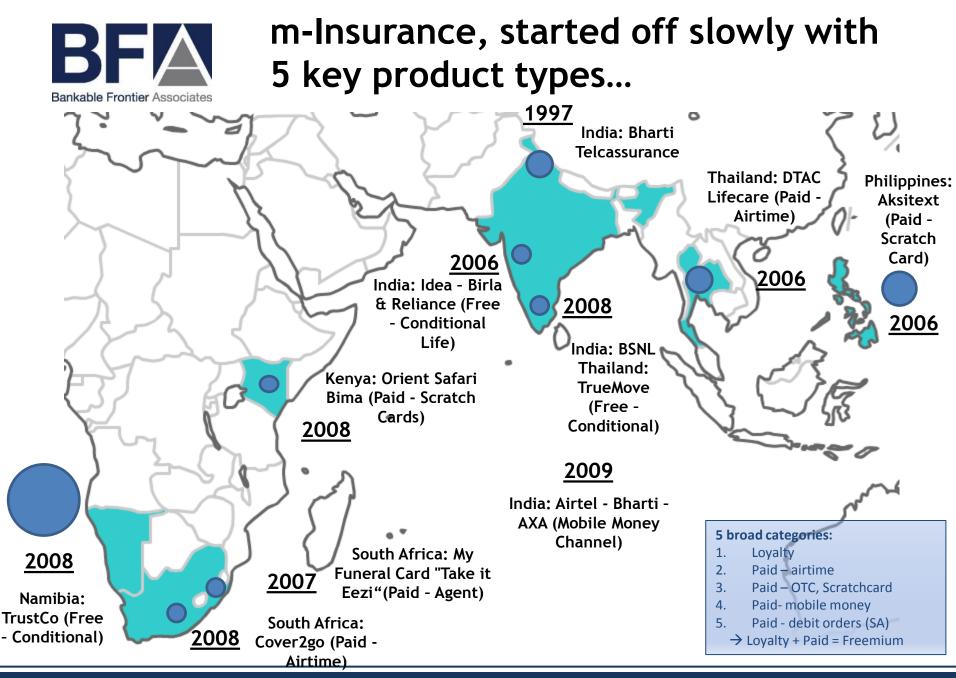
 Shared admin and mobile platforms offer potentially cheaper method of serving clients

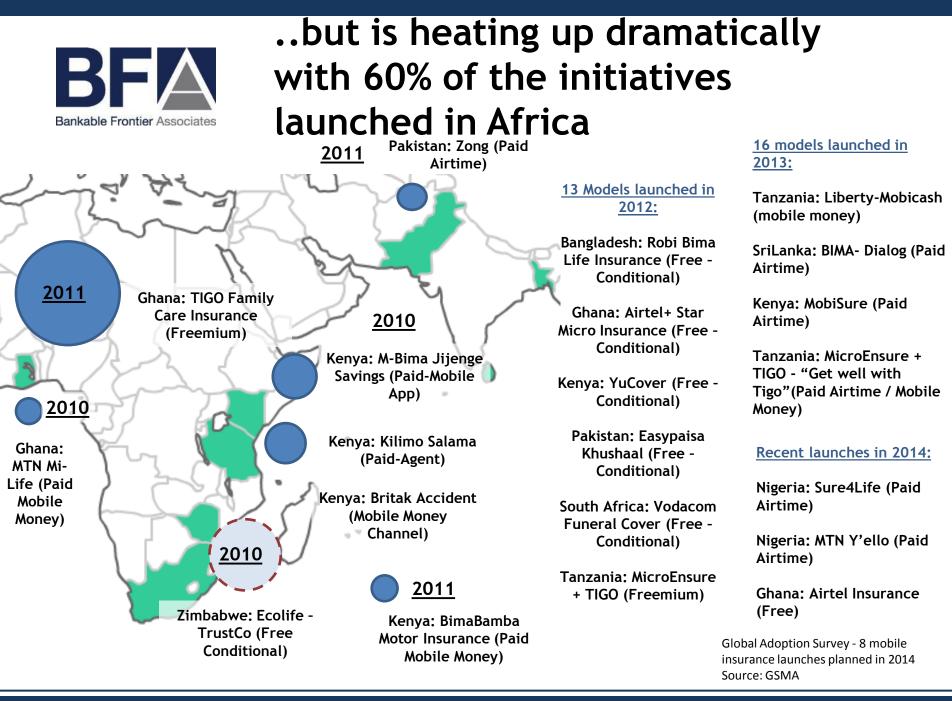


Empowering consumers

 enabling clients to manage their insurance cost effectively through upgrading and downgrading levels of cover.

See also Leach, 2010, M-insurance: the next wave of mobile financial services? Cover Magazine & Tellez C, 2012 emerging practices in mobile microinsurance. GSMA







A number of m-insurance sprinters have exploded on the market showing the potential for rapid growth

Ecolife Ecolife Zimbabwe reached 20% of the adult population in 7 months	Loyalty
Telenor Easypaisa Khurshal Pakistan reached 400,000 people easypaisa in 2 months	Loyalty
Tigo Bima Ghana reached almost 1m lives in 3 years	Freemium
Leo Namibia reached 15% of the adult population	Loyalty
airtel Airtel Zambia reached an estimated 2m at launch	Loyalty
ति Robi Bangladesh has reportedly hit 4m clients	Loyalty
MTN and Airtel in Nigeria sign up 100,000 clients a month	Voluntary Paid





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The launch of EcoLife Zimbabwe







Loyalty scheme product provided to subscribers for "free"



Zimbabwe's largest MNO: 7 m subs.

First Mutual Life - Zimbabwe's largest insurer



Trustco Namibia served as the tried and tested technical service partner A promising start

- 7 October 2010 "free" embedded life insurance product launched to Econet subscribers on an 'opt in' basis
- **31 March 2011** Trustco announces there are 1.6 million clients
 - (EcoNet claims there were only 1,2m)

Protect the ones you love through your MTN Mobile Money wallet

Note: Ecolife research funded by FinMark Trust.



And then EcoLife was cancelled due to a fall out between EcoLife and Trustco, a technical service provider

1,6m people / 20% of the adult population were reached by EcoLife Zimbabwe in 7 months \rightarrow 62% were not notified about its cancellation



63% Ruled out use of similar products in future

42% Dissatisfied with insurance



Ultimately the failure potentially impedes the growth of the insurance market



Confidential v1 Source: BFA-Cenfri on behalf of FinMark Trust





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Why should supervisors be concerned around m-insurance?

- Power imbalance between MNOs and insurance partners - MNOs typically dwarf insurers which undermines the ability of the insurer to manage the MNO
- Multiple regulatory jurisdictions adds complexity overlapping regulatory oversight can create confusion and regulatory arbitrage
- MNO brand power can create confusion around who is the insurer
- **Premium incidence** who pays raises questions around the level of risk



Examining risk in m-insurance will highlights areas for further investigation

Hypothetical ranking

Aggregator risk, sales risk, Policy Awareness risk, Regulatory backlash

Policy Awareness risk, Post sale risk, data risk

Prudential risk, Payment risk, systemic risk

Risk categories for m-insurance – adapted from A2ii





In order to understand the risks of m-insurance we need to assess the risk drivers which leads to a range of indicative recommendations

Examining risk drivers will inform application of the indicative recommendations



Indicative recommendations around how to manage risk in m-insurance

- i. Define the m-insurance product
- ii. Clarify the policyholder
- iii. Define the nature of the legal relationship and the responsibilities pertaining to all parties involved
- iv. Determine whether premium incidence changes the risk profile
- v. Assess whether there are appropriate levels of disclosure
- vi. Clarify consumer recourse options available
- vii. If you fail, then fail well creating a living will





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What do we need to do differently?

- m-insurance offers significant potential for growing inclusive insurance markets. However there is a need to manage the risk of failure whilst encouraging innovation.
- In supporting these models, supervisors need to ensure that "if one fails, one should fail well". These models should be encouraged to follow rules that protect against the fall out if things go wrong



Jeremy Leach

Director: BFA

jleach@bankablefrontier.com

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