

About this toolkit

Digital innovation can be a game changer in the quest for developing inclusive insurance markets – but it also entails risk. Striking the balance to protect consumers while facilitating innovation is an ongoing journey for regulators and supervisors in Africa.

What is the best approach to support innovation, and how to go about it?

This toolkit offers practical advice and examples on how to take stock of the current state of innovation, identify what holds back innovation, and choose and implement a fit-for-context combination of tools to take innovation to the next level.

Who should read this toolkit?

- Any regulatory authority wanting to fulfil a market development role
- Donors and advisors supporting regulators in this quest

This toolkit is part of FSD Africa's Risk, Resilience and Regulatory Lab – R3Lab in short – a platform for capacity building and peer exchange amongst regulators.

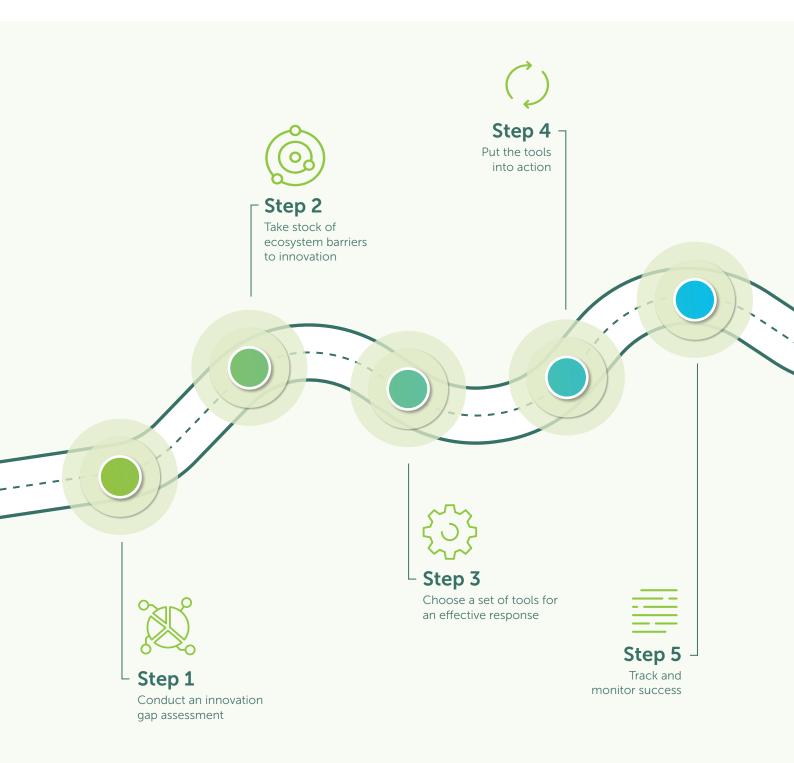
This toolkit builds on a set of eight insurance innovation country portraits conducted by the R3Lab.



Regulating for innovation: the road to success

There are five main steps along the road to regulate for responsible innovation.

This toolkit covers each in turn:





Starting point

Understand where the innovation journey is at

Conducting an innovation gap assessment

The starting point is to understand the current state of the market, level of innovation and what the gap is.

This has two components:



1.

1. Understand the current state of the insurance market

Key indicators to be on the lookout for:

Penetration rate

2. Total premium trends

Target market reach: number of 3. policyholders; % of adults covered

Landscape of providers: 4. number; types; market shares

> Distribution landscape: main channels; scope for alternative distribution



2. Document the current state of innovation

This has two parts:

A. Take stock of instances of innovation across the insurance life cycle in the existing insurance sector:



B. Assess the state of insurtech innovation



How many insurtechs are there?



products?



Which partnerships?



5.

3. Conclude on the innovation gap

Given the current market picture, what is the need for innovation? How far does innovation already go to meet that need? What are the gaps?



See the full toolkit for more detail and examples



What causes the gap?

Taking stock of the ecosystem dynamics that shape innovation

The level and nature of innovation is shaped by several factors in the broader innovation ecosystem. The next phase is to understand how these factors interplay to explain the innovation picture as seen in Step 1:





Market factors



Regulatory factors



Supervisory factors



Underlying infrastructure to enhance market effeciency, including electricity, access to mobile phones and adequately priced digital connectivity



A strong talent pipeline to spur innovation in incumbents and form innovative start-ups



Market engagement enablers: a digitally and finacially literate population who is ready to take up innovation; availability of appropriate and ready aggregators/ distribution partners, underwriting partners or tech partners



Access to finance for innovators throughout the development lifecycle of the firm, as well as for new innovative ventures among incumbents



An enabling, testand learn regulatory environment



Supervisory support for innovators/ new market entrants, including transparent and timely licensing processes, soft guidance and facilitating collaboration between tech innovators and incumbent players



See the full toolkit for more detail and examples

How to go about assessing the ecosystem?

Speak to various stakeholders – understand what's driving their behaviour

Desk review – look at indicators and trends in infrastructure, education, finance

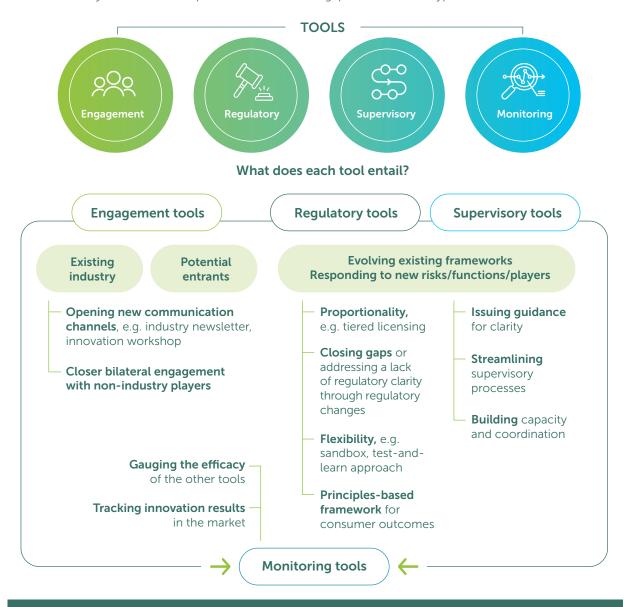
Regulatory review – are there specific gaps and barriers or is there a lack of regulatory clarity in the regulation relevant for innovation?

Institutional assessment of the supervisory authority – how do internal systems and processes work, for example licensing or product approval? How do these facilitate or hold back innovation?



Tools for regulating and enabling innovation

Armed with an understanding of what the innovation gap is and what causes it, the next step is to understand the set of tools that you can use to respond to the innovation gap. There are four types of tools available:



Tip: Think beyond regulatory tools — a cost-benefit approach

Though regulation is often the first tool that comes to mind, supervisory and engagement tools are vital to address barriers to innovation that either do not stem from legislation or do not require regulatory amendment to be implemented. Ongoing monitoring, in turn, is important to gauge the success of interventions under the other tools, and to inform updates. Regulation may also take a long time and be resource intensive. It is therefore essential to consider a combination of regulatory, supervisory, engagement and monitoring tools in any regulating for innovation strategy, mindful of the **costs** and **benefits** of each.

Let's now unpack each step in turn





Engagement tools

What it is

Engagement tools entail proactive engagement with, and signalling to, the market. Topics include:

- Why is there a need for innovation? Examples of innovation from elsewhere
- What is the regulatory scope and supervisory processes within which the market can innovate?

Such communication helps to reduce uncertainty and prompt ideas.

How it works

Examples:



Important! Engagement should extend not only to incumbent market players, but also to potential new entrants and those partnering with insurers to provide an innovative offering, such as aggregators, technical service providers or insurtechs.





Regulatory tools

What it is

Anything that involves changing or issuing regulation or legislation

How it works

Regulatory tools can be wielded to do four main things:

Introducing proportionality

- License requirements in line with risk posed, such as a tiered license for microinsurance
- Proportionate agent requirements for simplified products
- Tiered KYC

Moving to a principlesbased framework for consumer outcomes

 Entrenching a set of consumer outcomes principles in regulation to which industry is held accountable









Introducing flexibility to allow innovative ideas to be tested

- A regulatory sandbox
- A test-and-learn approach, such as using letters of no objection

Beware! When designing a sandbox, carefully consider capacity constraints and market incentives to make sure it does not become a white elephant

Addressing a lack of regulatory clarity

Regulatory changes to bring clarity or accommodate evolving market practices, for example:

- A new licence category for technical service providers or insurtechs
- Tailored conduct requirements for nontraditional players
- Allowing for remote onboarding
- Dealing with the use of algorithms and chatbots in insurance distribution





Supervisory tools

What it is

Any action by the regulator that does not entail changes to regulation:

- Non-legally binding guidance
- Adaptations to supervisory systems and processes

How it works

There are three types of supervisory tools:

Issuing non-legally binding guidance to promote clarity, e.g.

- Explain what implementation of data protection means for insurance
- List what acceptable activities for technical service providers are

Building capacity and coordination, e.g.

- Earmarking a team to oversee innovation
- Setting in place structures to coordinate across departments and with other regulatory authorities







Streamlining supervisory processes, e.g.

- Reducing the time and bureaucracy for licensing and product approval
- Instituting a product innovation committee
- Digitalisation of supervisory systems
 leveraging suptech as a way of enhancing the process, use of data





Monitoring tools

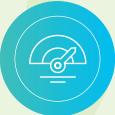
What it is

- Expanding what the authority monitors on an ongoing basis beyond traditional indicators such as penetration, premium volumes and solvency
- Tracking progress in the implementation of each of the other tools
- Taking note of the effects in the broader market

How it works

Setting key performance indicators (KPIs) for each of the other tools implemented





Setting broader indicators for market development and innovation

See the **A2ii market development supervisory lexicon** and handbook for a full list of indicators, e.g:

- Industry-wide claims and combined ratios
- Product approval turnaround time
- Insurance coverage ratio
- Prevalence of digital models
- Prevalence of product and business model innovation



Monitoring tools (continued)

What are the monitoring methods in the toolbox?



Regulatory reports analysis – draw indicators from current reporting templates, and update templates

where relevant



Complaints
analysis – analyse
aggregate
complaints data
collected by
the regulator,
ombudspersons
or consumer
associations



Social media monitoring – listen to the collective voice of consumers



Mystery shopping
– observe actual
behaviour of
company staff or
third parties



Industry
engagement –
direct interaction
and dialogue with
companies and
associations to
gather intelligence

Choose your method depending on the supervisory objectives:

	Monitoring methods 🥎				
Supervisory objectives 🥎	1	2	3	4	5
Monitor indicators of consumer risk	Ø	•	Ø	8	8
Monitor sales and marketing practices	8	•	8	⊘	✓
Monitor products in the market	•	8	⊘	⊘	•
Monitor consumer complaints	⊘	⊘	•	8	8
Monitor consumer sentiments towards a provider	8	8	Ø	Ø	8
Monitor emerging consumer issues	8	8	•		



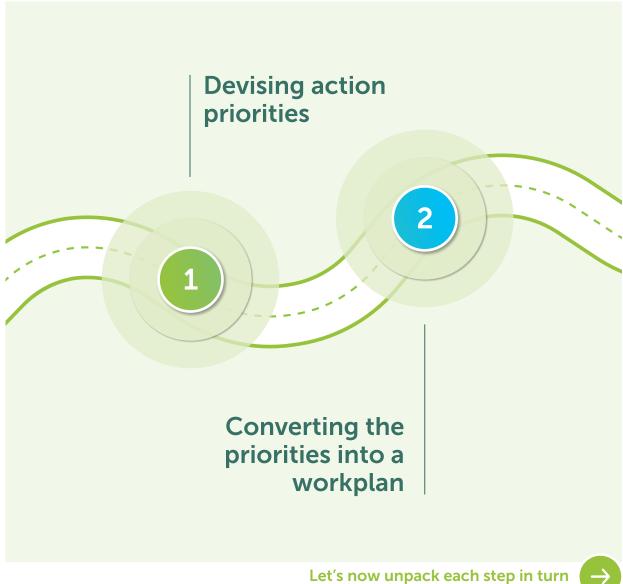
Putting the tools into action

Toolkit check-point. Based on the previous steps:

- You know what the innovation gap and barriers are and have a list of things that can be done in response
- You've taken stock of the range of tools at your disposal

What now?

There are two key steps to put the tools into action:



Devising action priorities

Determining your priorities is the first part of putting the tools into action. It entails three steps:

1



Identify needs in context – from the gap and ecosystem assessment, what are the key things needed for innovation to thrive and how can the various regulatory tools address that?

2



Pinpoint priorities – set an action plan to address the innovation gap that leverages a combination of tools across the toolbox

3



Assess capacity – understand what the resources and constraints are within the supervisor that set the realm of the possible. Which team will implement the action plan?

What if it's outside your control?

Some of the ecosystem factors (such as infrastructure, market engagement or access to finance) will be outside of the regulator's direct control, so then the question becomes how you can wield your engagement tool with the market, or coordinate with other government departments, to nudge and encourage those who are able to make a difference to take action.

Action plan examples from the R3Lab:



- Signal a proinnovation stance
- Launch industry awards or challenges
- Regularly meet with industry and prospective new players
- Issue an innovation newsletter



- Allow for use of digital distribution/remote onboarding and digital signatures
- Create a licence category for insurtechs or technical service providers
- Update microinsurance regulations to ensure that they create the right incentives and are in line with market realities
- Create regulatory sandbox regulations



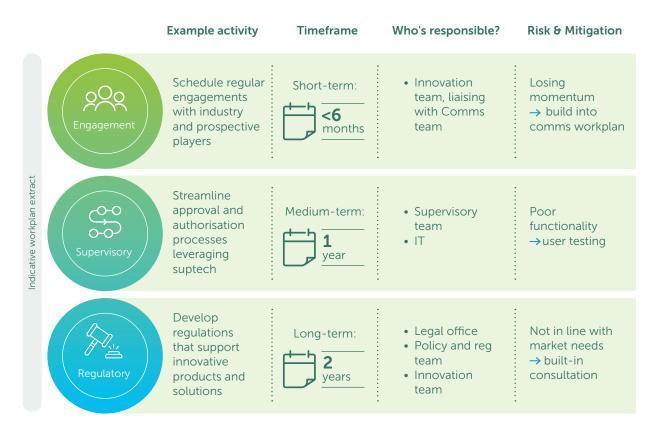
- Dedicate a team within the authority to promote innovation
- Build inter-regulatory coordination structures
- Upgrade or implement an online supervisory portal
- Streamline the licensing and product approval systems



Developing and implementing a workplan

Developing a workplan to give effect to the action priorities is the second part of putting the tools into action – it's the springboard to start to implement your list of priorities

- Formulate specific activities
- Say who is responsible for each activity
- Define the timeframe based on the priorities and a cost-benefit assessment of the tools:
 - What can be done in the short-term, what over the medium-term and what is a longer-term priority?
- Define risks and mitigating actions



Key success factors for workplan implementation

- Workshop the specifics of the workplan with the team who will need to implement it their buy-in is essential!
- Be realistic rather implement a handful of things well than set numerous tasks that you won't get
- Align priorities with the authority's existing strategy and workplan
- Earmark capacity the ideal is to have one team who is responsible for the overall implementation of the workplan, who then coordinates with specific departments given specific tasks
- Consider how the workplan can fit into existing coordination structures, such as committees, within the authority



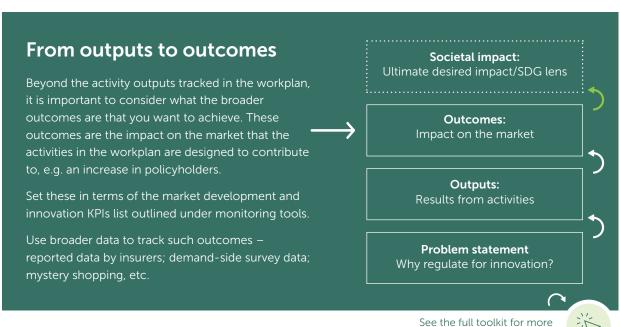
A framework for monitoring progress

Take stock and adjust. A workplan is only successful if it's effectively implemented. The final step along the regulating for innovation journey is to monitor progress and adjust the workplan as necessary.

What does this entail?

Set specific measurable targets and indicators for each workplan activity and its corresponding data source.

Example activity Timeframe KPIs Data source • # engagements per Event registers/ Schedule regular Short-term: annum attendance lists engagements % attendance by Event with industry <6 non-incumbents evaluation and prospective months Expressed satisfaction forms players with events Streamline approval and Medium-term: Regulatory • Decrease in product authorisation approval timeline authority processes # new products internal system leveraging year licensed tracking suptech Develop • ToRs for consultation Regulatory Long-term: regulations and drafting authority that support committee issued internal system 2 innovative New regulations issued tracking years products and • # new innovative Licensing solutions solutions and products statistics



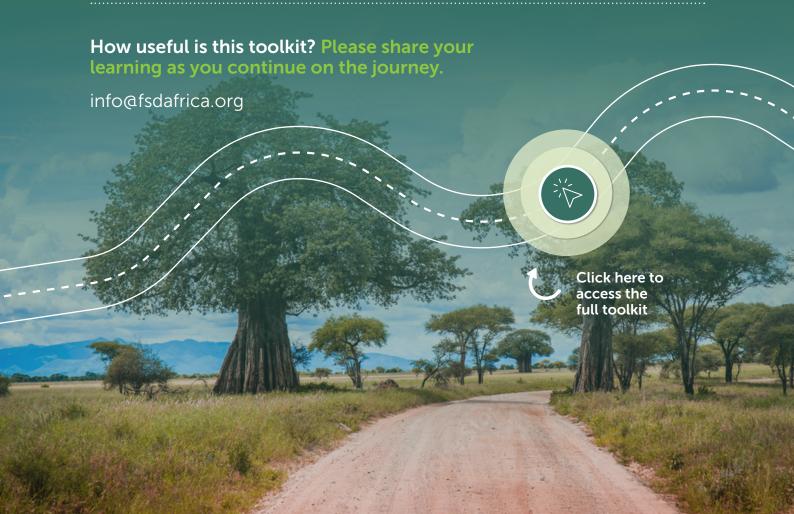
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The journey continues

This toolkit offers practical inputs and examples for regulatory authorities committed to growing innovations in their markets. It covers:

CHECKPOINTS:

- How to identify the **need** for innovation and the **gaps** in the market
- How to take stock of the **barriers** to innovation in the broader ecosystem
- What **tools** are available to respond
- How to devise action priorities
- ✓ How to define and implement a **workplan** to achieve the priorities
- ✓ How to measure success of the specific activities and in terms of broader innovation outcomes





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