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UK-India Trade in Fintech & Fintech-Enabled Services

State of Open Banking in India and UK

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Policy Paper 4 – UK India Fintrade
August 2024



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Research and Information System
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Executive Summary

- Open banking, facilitated by APIs, is revolutionising the financial sector by enabling secure third-party access to consumer banking data. This fosters innovation, competition, and efficiency, empowering customers with control over their financial information and supporting personalized financial services.
- Regulatory frameworks like PSD2 in the EU and CDR in Australia play crucial roles in ensuring security, privacy, and interoperability. Despite challenges such as data privacy concerns and regulatory compliance, open banking offers a trillion-dollar growth opportunity globally, promising enhanced financial inclusion, customer experience, and increased operational efficiency across diverse economies.

Focus on UK & India

- The UK's Open Banking initiative, launched in 2018 under the Open Banking Standard, has fostered a dynamic ecosystem of fintech innovation by mandating major banks to provide APIs for third-party access to customer data. Despite initial growth challenges, including limited acceptance points, Open Banking payments in the UK have shown significant uptake. Projections indicate continued expansion driven by fintech adoption and regulatory support.
- Open Banking in India is rapidly transforming the financial landscape, driven by regulatory mandates and market competition. Enabled by APIs like UPI, it enhances financial inclusion, fosters innovation, and challenges traditional banking models, promising a dynamic future for financial services.

Challenges & Outlook

- The adoption of Open Banking APIs in the UK and India faces significant challenges, including data security and privacy concerns, compliance risks, and cybersecurity threats. These issues can affect customer perception and hinder their willingness to share data readily, potentially limiting the model's promotion and acceptance.
- Addressing these challenges through IT modernization, developer platforms, robust API architectures, revenue sharing models, and enhanced data strategies will be crucial for sustainable growth and customer trust in the open finance ecosystem. Investment in cyber-security measures, along with effective governmental supervision, is also essential.

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Introduction

Open banking, or open finance, signifies a transformative shift in the financial services landscape driven by technological advancements and regulatory mandates. This concept involves financial institutions opening their APIs (Application Programming Interfaces) to third-party developers, enabling secure access to customer financial data. The primary goals are to enhance competition, foster innovation, and improve the customer experience by facilitating the seamless integration of financial services across various platforms.

Open banking has gained significant traction globally, though the pace and regulatory frameworks vary. Countries like the United Kingdom, Australia, and parts of the European Union have pioneered comprehensive regulatory measures to support open banking practices. These regions have experienced increased collaboration between traditional financial institutions and fintech companies, leading to a surge in innovative financial products and services.

In the UK, open banking is regulated under the Payment Services Directive 2 (PSD2), which mandates that banks open their APIs to licensed third-party providers. This initiative aims to give consumers greater control over their financial data, facilitate easier comparison of financial products, and drive competition among banks and fintech firms. The UK's open banking ecosystem has seen the emergence of personalised financial management apps, real-time payment solutions, and enhanced fraud prevention measures, improving overall financial inclusivity and efficiency.

In India, open banking catalyses financial inclusion and digital transformation. Implementing initiatives like the Unified Payments Interface (UPI) has created a robust foundation for open banking practices, allowing seamless real-time payments between banks and fintech platforms. The Reserve Bank of India's (RBI) regulatory support has been crucial in shaping the open banking landscape, encouraging banks to collaborate with fintech startups and develop innovative solutions tailored to diverse consumer needs. The Account Aggregator framework introduced by the RBI enables secure sharing of financial data across institutions, further promoting transparency and consumer empowerment.

Regulatory frameworks play a crucial role in shaping the implementation and evolution of open banking practices worldwide. These frameworks strive to balance innovation with consumer protection, ensuring financial data is shared securely and with explicit customer consent.

Despite its potential benefits, open banking faces several global challenges. Privacy and data security concerns are paramount, as sharing sensitive financial information raises issues related to data breaches and unauthorised access. Additionally, regulatory compliance presents another challenge as financial institutions and fintech providers navigate complex legal frameworks to ensure adherence to stringent data protection standards.

Demystifying Open Finance

Open banking is a financial services practice that enables third-party financial service providers to access consumer banking, transactional, and other financial data through application programming interfaces (APIs). This concept is designed to foster innovation, competition, and efficiency in the banking sector by allowing customers to share their financial information with different service providers securely.

A key component of open banking is using APIs, which facilitate the secure sharing of financial data between banks and third-party providers (TPPs) such as fintech companies, payment services, and other financial institutions. By leveraging APIs, open banking ensures that customer data is shared safely and efficiently, enabling the development of innovative financial products and services.

Open banking aims to transform the financial landscape by giving consumers greater control over their financial data and providing them with more personalized and convenient services. This includes comparing financial products more easily, accessing tailored financial advice, and benefiting from new payment solutions and financial management tools.

Furthermore, open banking promotes transparency and consumer empowerment. Allowing customers to choose which third-party providers can access their data ensures that they remain in control of their financial information. This increased transparency also encourages competition among financial institutions, driving them to improve their services and offer better products to retain and attract customers.

Regulatory frameworks worldwide, such as the Payment Services Directive 2 (PSD2) in the UK and the Reserve Bank of India (RBI) initiatives, play a crucial role in shaping the open banking landscape. These regulations balance innovation with consumer protection, ensuring data sharing is conducted securely and with explicit customer consent.

Despite its many benefits, open banking faces challenges, particularly concerning privacy and data security. Sharing sensitive financial information raises concerns about data breaches and unauthorized access. Additionally, financial institutions and fintech providers must navigate complex regulatory environments to ensure compliance with stringent data protection standards. Nonetheless, the potential for open banking to enhance financial services and improve customer experiences makes it a significant development in the financial sector.

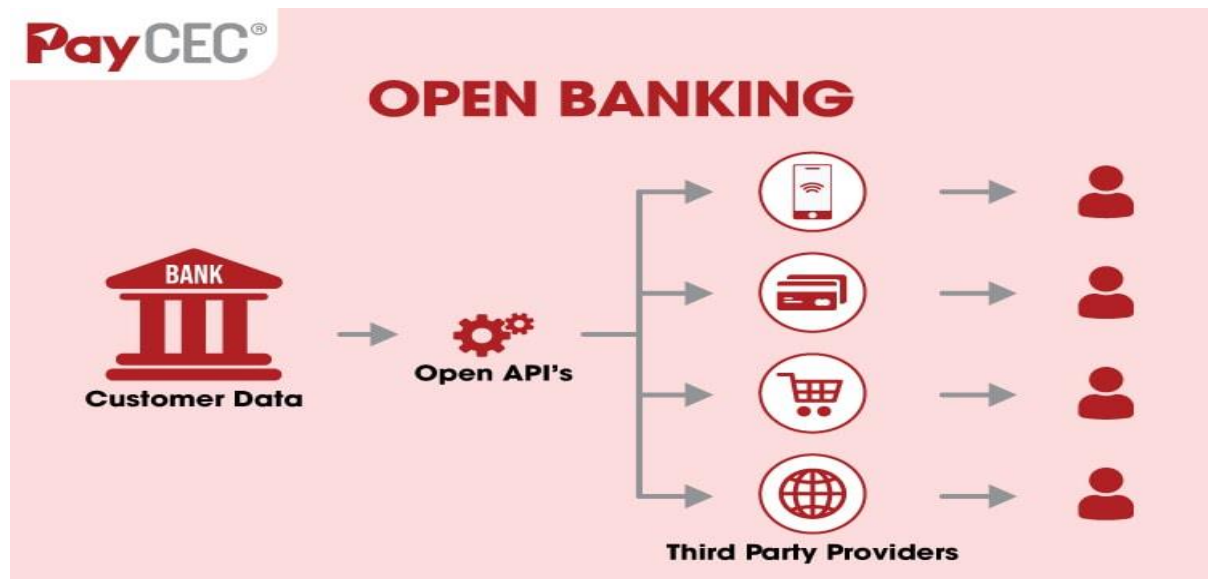


Figure 1: How Open Banking works (Source: PayCEC)

Other relevant aspects of the concept include customer consent, requiring explicit permission from customers to share their financial data. This ensures customers retain control over who accesses their data and for what purpose. Open banking initiatives are often underpinned by regulations and standards that provide security, privacy, and interoperability. For instance, the EU's Revised Payment Services Directive (PSD2) mandates open banking across member states.

Open finance is not just a theoretical concept but a practical solution that can democratize access to financial services. With the exponential growth in e-commerce, smartphone usage, and digital adoption, customers are demanding services that are easy to access, fast, and secure. True innovation will come when we prioritize customer journeys and integrate personalized products and services into these experiences. The success of open finance is not just a result of regulatory mandates, such as the EU's Revised Payment Services Directive (PSD2), but also

the influence of market forces, which have driven remarkable open finance success stories and empowered customers with innovative solutions.



Figure 2: Open Banking Global Snapshot (Source: twimbit Analysis; Dealroom.co)

This paper on open finance offers insights into the total addressable opportunity, potential economic impact, and critical success factors necessary for its growth. Leaders from banks, FinTech institutions, and technology platforms contribute to developing market estimates. By focusing in-depth on the evolution of Open Banking in the UK and India, along with other global observations, the paper also discusses challenges and obstacles related to the structure and the role of regulation.

Open finance facilitates seamless connections between banks and third-party service providers through Application Programming Interfaces (APIs), enabling the effective creation, operation, and delivery of products and services tailored to customer needs. This mechanism allows secure financial data access via APIs from the bank’s ecosystem, promoting efficient data sharing between banks and third-party providers.



Figure 3: Open Banking Revolution Vs Conventional Banking (Source: PayCEC)

For banks, open finance facilitates white label banking (private label banking) based on the principles of Banking as a Service (BaaS), transforming their products and services into plug-and-play solutions. Embedded finance, a subset of open finance, allows the seamless integration of financial services into other consumer-facing digital platforms, enabling banks to cross-sell products and services. Banks, FinTechs, aggregators, and tech platforms collaborate to create powerful ecosystems that integrate financial products and services with customers’ daily needs, making them accessible anytime and anywhere with just a few clicks.











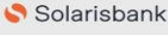



























	2005-2010	2010-2015	2015-2020	2020-2025E
Buy Now Pay Later				 
Marketplaces			  	   
BaaS providers			 	    
Neobanks		 	 	   
Aggregators	  	  	  	
Industry specialists	  	 		

Figure 4: Banks, FIs New Revenue Models through Open Finance (Source: twimbit analysis)

Outcomes Enabled by Open Finance

Open banking can range from basic compliance with PSD2 regulations to more extensive integrations involving new services and data sharing, ultimately creating platform experiences that leverage economies of scope. Omarini (2018) highlights the evolution of FinTech, focusing on platform models like BBVA's Banking as a Platform, which illustrate how banks can adapt to the digital age and better interact with customers by using the data they hold.

The challenges include effectively exploiting disruptive technologies, which require a bank-specific approach, and balancing cost-benefit considerations. Open banking, facilitated by APIs, offers a chance for banks to innovate and diversify their offerings, though trust remains crucial in this new financial ecosystem. Some of the major outcomes enabled by open finance (open banking) include:

Banking-as-a-Service (BaaS)

Opportunity for license holders to become providers of white label and co-branded products and services.

Enables a plug-and-play approach for integrating banking solutions into third-party ecosystems, including non-financial digital brands, reducing the cost to serve and the cost of customer acquisition.

Embedded Finance

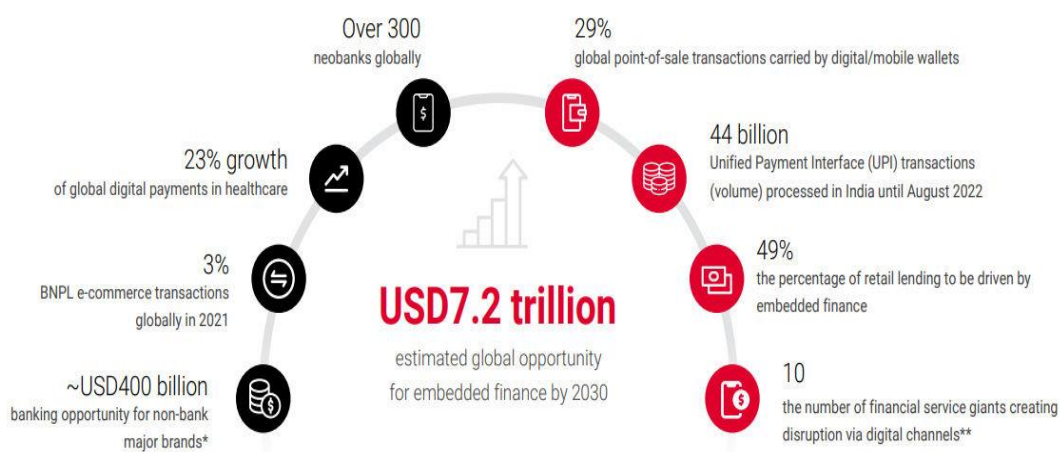
Data Monetisation: A customer-facing digital platform distributes products and services, while the bank or licensed holding partner owns and manages the customer data and compliance management.

Embedded Experience: Creates journey-led transactions that support all aspects of customers' daily lives and their points of need.

Data Monetisation

Leverages the treasure trove of information to address customer needs and provides actionable insights to help unlock value.

Business models include providing raw data as a service, generating actionable insights from data, or supporting outcomes such as KYC, fraud management, and other innovative services.



Source: twimbit analysis; Worldpay; The Financial Brand; NYU STEM; Simon Torrance Embedded Finance; Mambu embedded finance report; NPCI
 *Deliver Wyman Global Study
 **Grab, Gojek, Kakao, Paytm, Wechat, Alipay, Square, UnionPay, PayPal, and PhonePe

Figure 5: Open Finance Growth Forecast 2030 (Source: twimbit analysis)

Open finance creates a trillion-dollar growth opportunity. In addition to the above outcomes, Open Banking provides FinTech startups a competitive edge over tech giants. FinTechs, which are financial technology firms leveraging digital tools, have gained popularity recently but now face competition from tech companies. Gogia (2022) highlights that collaboration between traditional banks and FinTech firms can mitigate the impact of tech giants in financial markets. Open banking provides a secure way for customers and small businesses to share data, enabling new and existing firms to offer rapid payment methods and innovative banking products, thereby revolutionizing financial interactions.

Growth Opportunities for Open Finance

Open finance and open banking hold significant potential to address the shortfalls in the banking industry, thereby presenting numerous growth opportunities across various dimensions of the financial services sector. Figure 4 underscores some of the challenges in the banking industry, such as the lack of penetration, with a global unbanked population of 1.4 billion in 2022, low consumption of banking products (1-2 products per person), underserved SME customers, and stringent regulatory protocols. The growth opportunities in open banking can play a pivotal role in addressing and improving these shortfalls.

For instance, integrating open banking can facilitate financial inclusion by enabling easier access to banking services for the unbanked population. By leveraging open banking platforms, FinTechs can create tailored financial products that cater to underserved communities and small businesses' unique needs, thus increasing their participation in the financial system. Furthermore, the flexibility and innovation offered by open banking can lead to developing more user-friendly and diverse banking products, encouraging higher consumption among current banking customers.

Additionally, open banking can streamline compliance with regulatory requirements. The transparency and standardized data-sharing mechanisms inherent in open banking systems can reduce the complexity of regulatory adherence, making it easier for financial institutions to meet their obligations while focusing on innovation and customer service.

The collaboration between traditional banks and FinTech firms, fostered by open banking, is a key driver of a more competitive and dynamic financial market. Traditional banks, with their established customer bases and regulatory knowledge, can effectively partner with agile and innovative FinTech firms to deliver cutting-edge financial services. This synergy not only helps

traditional banks stay relevant in a rapidly evolving market but also empowers FinTech firms to scale their operations and reach a broader audience, thereby reshaping the financial market.

In conclusion, the growth opportunities presented by open finance and open banking are vast and multifaceted. By addressing existing gaps in the financial system, enhancing financial inclusion, simplifying regulatory compliance, and fostering collaboration between traditional banks and FinTechs, open banking has the potential to drive significant advancements in the financial services sector.

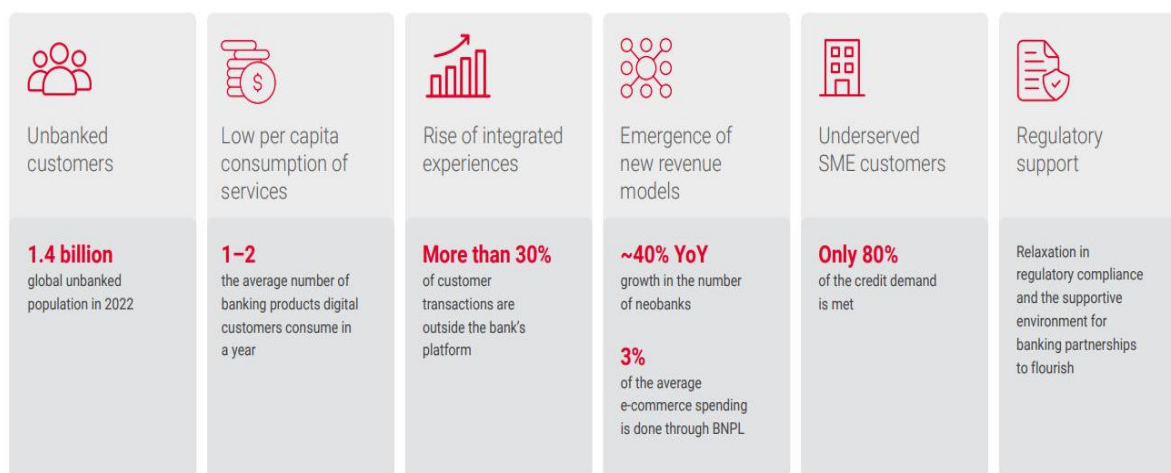


Figure 6: Open Finance Industry Statistics (Source: twimbit analysis)

Product Innovation

Some key growth opportunities are manifested in the form of enhanced financial services and products. Open banking allows financial institutions and FinTech firms to develop more personalized financial products by leveraging comprehensive customer data. This can include tailored loan products, personalized investment advice, and customized savings plans. For example, a FinTech company can analyze a customer's spending habits, income patterns, and financial goals to offer a loan with terms specifically suited to that individual's needs. Similarly, personalized investment advice can be provided based on a customer's risk profile and investment objectives, leading to more effective wealth management.

In addition, open banking can lead to innovative payment solutions. The ability to initiate payments directly from bank accounts can foster the development of new payment methods that reduce reliance on traditional card networks and lower transaction costs. For instance, real-time payments directly from a bank account can enhance the efficiency of e-commerce transactions and peer-to-peer payments. Brodsky and Oakes (2017) highlight that these

advancements streamline payment processes and make financial transactions more cost-effective for consumers and businesses.

Enhanced Customer Experience

Open banking revolutionizes the customer experience by aggregating data from multiple accounts and financial institutions into a single platform. This provides customers with a holistic view of their finances, enhancing their ability to manage money, budget, and plan for the future. For example, a customer could use an open banking platform to see their checking, savings, investment, and credit card accounts all in one place, making it easier to track spending, identify savings opportunities, and plan for upcoming expenses. This level of convenience and efficiency makes customers feel valued and catered to.

Open banking simplifies and accelerates customer onboarding and verification using shared data. When a new customer signs up for a financial service, their data can be securely shared from their existing bank account to the new service, simplifying the verification process and reducing the time and effort required to set up the account. This streamlined process not only improves customer satisfaction but also increases the likelihood of customers adopting new financial products and services. This reassures the audience about the smooth transition to open banking.

In summary, open banking and open finance present substantial growth opportunities by enabling the development of personalized financial products and innovative payment solutions. Additionally, by enhancing the overall customer experience through data aggregation and streamlined onboarding processes, open banking can significantly improve how individuals manage their finances and interact with financial services.

Increased Competition

Lower barriers to entry for new FinTech startups and financial service providers lead to increased competition and innovation in the financial sector, representing another major growth opportunity for open banking. This increased competition correlates with the establishment of collaborative ecosystems. Banks and FinTechs can collaborate more easily, creating ecosystems where different providers offer complementary services, enhancing the overall value proposition for customers (Gozman et al., 2018). By fostering an environment where new entrants can thrive, open banking stimulates innovation and provides consumers with a broader array of financial products and services.

Financial Inclusion & Access to Credit

Financial inclusion and increased access to credit are crucial areas influenced by open banking and open finance. Open banking data can help assess the creditworthiness of individuals and small businesses that might not have a traditional credit history, thereby improving access to loans and credit products. Increased competition can reduce costs, making financial services more affordable and accessible to underserved populations. Open banking is revolutionizing financial services in advanced economies by enabling FinTechs and other innovators to access customer data from traditional banks. This leads to the development of tailored products and services. This model holds promise for emerging and developing economies (EMDEs) by potentially fostering innovation and reducing costs to serve underserved and unbanked populations better.

In a study on financial inclusion, Plaitakis and Staschen (2020) review 12 open banking regimes, including detailed studies of seven, identifying 12 crucial design components for policymakers to consider. As argued by the authors, five key components are critical for financial inclusion: data sharing requirements, types of data shared, industry coverage, payment initiation, and cost allocation. Addressing these elements effectively can enhance the diversity of services and competition, benefiting low-income individuals. The paper urges policymakers to design open banking frameworks with financial inclusion in mind.

Operational Efficiency

Open banking boosts operational efficiency by enabling smooth data sharing between banks and third-party providers via standardized APIs. This minimizes manual data entry and reconciliation, streamlining tasks like account verification, loan approvals, and payment processing. Real-time access to customer data enhances risk assessment and fraud detection, reducing errors and delays. Overall, automation and better connectivity lower costs and speed up service delivery, creating a more efficient banking system.

Regulatory Compliance and Advancements

Effective regulatory requirements for open banking include standardized API protocols, stringent data privacy and protection measures, and clear guidelines for customer consent. Additionally, regulations must ensure fair competition and interoperability among participants while preventing fraud and cybersecurity threats. Continuous regulatory improvements are essential to address emerging challenges, such as technological advancements and evolving

consumer needs. These improvements should focus on enhancing cross-border data flows, refining identity verification processes, and fostering innovation without compromising security. A dynamic and adaptive regulatory approach will be crucial for sustaining the growth and stability of open banking, ensuring it continues to benefit consumers and the broader financial ecosystem (Nicholls, 2019).

Remolina (2019) examines the foundations, benefits, and risks of open banking and compares various regulatory approaches. It concludes with policy recommendations, emphasizing that a uniform regulatory framework may hinder innovation and that regulations should be tailored to specific jurisdictions. Regulatory alignment ensures compliance with open banking regulations like PSD2 (EU), which can lead to a harmonized approach to data sharing and financial services across regions, promoting international growth.

Some important fields of consideration for regulation include having standardized API protocols. Regulators mandate interoperable API protocols to facilitate seamless data sharing, promoting fairness and integration. Data privacy and protection measures safeguard sensitive data through encryption and consent management, reducing risks of unauthorized access. Regulatory frameworks ensure customer control over data sharing, promoting transparency and informed consent. Lastly, continuous monitoring and evaluation can help regulators monitor and update regulations to address emerging risks and improve effectiveness, ensuring ongoing regulatory compliance and enhancement.

Integration with Emerging Technologies

Open banking collaborates with AI and machine learning by leveraging the vast amounts of financial data available through open APIs to drive insights, enhance decision-making processes, and deliver personalized financial services. AI and machine learning algorithms analyze transactional data, customer behaviour, and market trends to identify patterns, detect anomalies, and predict future outcomes more accurately. This enables financial institutions to offer tailored products and services, optimize risk management strategies, and automate routine tasks such as credit scoring and fraud detection.

Additionally, AI-powered chatbots and virtual assistants provide personalized financial advice and support, enhancing the customer experience. By integrating AI and machine learning with open banking, financial institutions can unlock new levels of efficiency, innovation, and customer satisfaction in the rapidly evolving digital banking landscape. Open banking can also

lead to accelerated growth across sectors. Every industry vertical will become an advocator for open finance, as illustrated in Figure 7 below.



Figure 7: Accelerated Open Finance Growth & Integration (Source: twimbit analysis)

Open banking and open finance provide a plethora of growth opportunities by enhancing financial services, improving customer experiences, fostering innovation, and promoting financial inclusion. By embracing these opportunities, financial institutions can not only stay competitive but also drive significant value for customers and the broader financial ecosystem.

Open Banking Benefits

Benefits to customers

There numerous benefits Open Banking can offer to customers, highlighted as below:

- **Make immediate payments:** Open Banking allows instant bank-to-bank transfers, enabling quick and efficient payment processing without delays
- **Execute automatic payments:** Users can set up automatic payments for regular bills and subscriptions, ensuring timely payments and avoiding late fees

- **Perform recurring payments:** With Open Banking, users can schedule recurring payments, such as rent or utility bills, simplifying regular financial commitments
- **Plan future dated payments:** Users can plan and schedule payments for future dates, providing better control and management of their finances
- **Manage multiple bank accounts effortlessly:** Aggregation of multiple accounts through Open Banking allows users to view and manage all their financial accounts in one place, enhancing convenience and oversight
- **Get efficient financial advice and assistance easily:** Open Banking provides access to financial data that can be used by fintech services to offer tailored financial advice and assistance, improving financial decision-making
- **Receive hyper-personalized products and services:** Financial institutions and FinTech startups can use Open Banking data to offer personalized products and services based on individual financial behaviours and needs
- **Save time when applying for a loan or extending credit card limits:** Open Banking enables lenders to access verified financial information directly, speeding up the loan application and approval process and making it more efficient.

Benefits of Open Banking to Companies and Third-Party Providers (TPP) -- Reference

On the other hand, businesses and service providers can also stand to benefit from Open Banking, with several poignant benefits highlighted below:

- **View detailed banking data of all customers:** Open Banking allows authorized entities to access detailed financial data, providing comprehensive insights into customers' financial behaviour and status
- **Know income and expenses of customers:** By accessing transaction data, businesses can gain a clear understanding of customers' income and expenditure patterns, enhancing financial assessments
- **Have information to customize applications and services for customers:** Open Banking data enables the creation of highly personalized financial products and services tailored to individual needs and preferences
- **Initiate payments on customer's behalf:** Businesses can use Open Banking to initiate payments directly from customers' bank accounts, simplifying the payment process

- **Receive payments on time without reminding customers:** Automated payment initiation ensures timely payments, reducing need for reminders, improving cash flow
- **Get loyal customers and gain brand loyalty:** Offering personalized and efficient services through Open Banking can enhance customer satisfaction, foster brand loyalty
- **Give business an edge over the competitors:** Leveraging Open Banking can differentiate businesses by offering innovative financial solutions, providing a competitive advantage
- **Decrease cart abandonment rate and increase conversion rate:** Seamless and secure payment processes through Open Banking can reduce cart abandonment and boost conversion rates for online merchants
- **Diversify merchant payment methods:** Open Banking expands payment options for merchants, allowing them to offer more flexible and convenient payment methods to their customers
- **Reduce time needed to gather and examine customer finance status:** Access to real-time financial data streamlines the assessment process, saving time and resources for both businesses and customers
- **Grant transparency before making any decision:** Open Banking provides transparent access to financial data, aiding in accurate and informed decision-making for loan approvals and other financial services.

Global Open Banking Scenario

Open banking has significantly influenced the global financial landscape by promoting innovation, competition, and consumer empowerment. Figure 8 illustrates the stance of several countries toward open banking, highlighting two main factors in structuring the sector: regulatory initiatives and market-led initiatives. Countries most successful in the sector are those which have excelled in both sets of initiatives, suggesting an ideal balance with which to realize maximum growth and productivity in open banking. Some noteworthy examples of how different countries/blocs have embraced open banking are detailed below.



Figure 8: Twimbit’s Global Open Finance Maturity Index (Source: twimbit analysis)

European Union (EU)

The EU has been a pioneer in the open banking space, largely due to its regulatory framework, the Revised Payment Services Directive (PSD2). PSD2 mandates banks to open their payment services and customer data to third-party providers through APIs. This regulatory push has led to significant innovation and increased competition, allowing FinTech’s and other financial service providers to create new, customer-centric services. The EU’s emphasis on strong regulatory initiatives has ensured a secure and standardized approach to data sharing, fostering trust among consumers and encouraging widespread adoption.

Australia

Australia has adopted the Consumer Data Right (CDR), which gives consumers greater control over their data, extending beyond banking to other sectors like energy and telecommunications. In the banking sector, the CDR has facilitated the emergence of open banking by allowing consumers to securely share their banking data with accredited third parties. This approach not only promotes competition but also drives innovation by enabling new entrants to offer tailored financial products and services. Australia’s focus on consumer empowerment through data control exemplifies the potential of open banking to enhance financial inclusion.

United States

The US has taken a more market-driven approach to open banking, with significant developments being led by private sector initiatives rather than regulatory mandates. Large financial institutions and FinTech companies have formed partnerships to facilitate data sharing through APIs. However, the lack of a unified regulatory framework has resulted in a more fragmented landscape compared to the EU and UK. Despite this, the market-led initiatives have spurred innovation and competition, leading to the creation of diverse financial products and services that cater to a wide range of consumer needs.

Asia-Pacific

In the Asia-Pacific region, countries like Singapore and Hong Kong have made significant strides in open banking through proactive regulatory frameworks and industry collaboration. Singapore's Monetary Authority of Singapore (MAS) has been instrumental in promoting open APIs and encouraging FinTech innovation. Similarly, Hong Kong's Open API Framework for the Banking Sector sets out standards for data sharing, aiming to enhance competition and consumer choice. The region's balanced approach, combining regulatory guidance with market-driven initiatives, has resulted in a vibrant FinTech ecosystem that is rapidly evolving.

Latin America

Latin American countries, notably Brazil and Mexico, are advancing in the open banking space with strong regulatory support. Brazil's open banking initiative, led by the Central Bank of Brazil, mandates banks to share customer data with authorized third parties, aiming to foster competition and improve financial inclusion. Mexico's FinTech Law, which includes provisions for open banking, aims to regulate and promote financial technology, ensuring secure and efficient data sharing. These regulatory frameworks are paving the way for increased innovation and competition in the financial sector.

In summary, the global open banking scenario is shaped by a combination of regulatory initiatives and market-led efforts. Countries that have successfully balanced these two approaches have seen significant growth and innovation in their financial sectors. By fostering collaboration between regulators and the market, open banking can continue to drive consumer empowerment, enhance financial inclusion, and promote a more competitive and innovative financial landscape worldwide.

Open Banking in UK

The UK is often considered a pioneer in open banking, with implementing the Open Banking Standard in 2018. This initiative requires the nine largest banks to open up customer data through APIs, enabling third-party providers to access account information and initiate payments. As a result, the UK has seen the emergence of a vibrant ecosystem of fintech startups offering innovative services such as account aggregation, budgeting tools, and alternative lending options. These services have transformed the financial landscape, offering consumers greater control over their finances and fostering a more competitive market.

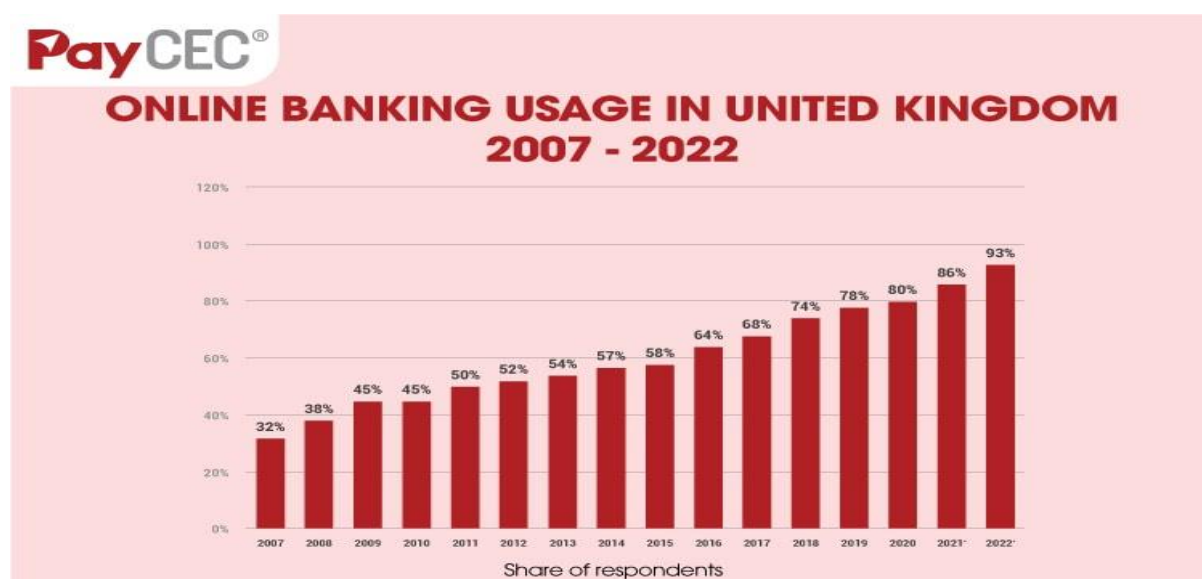


Figure 9: Online Banking Usage in the United Kingdom (Source: PayCEC)

Current Trends and Challenges

Despite the initial optimism surrounding open banking, recent trends indicate a slowdown in growth. According to Light (2024), there were 68 million open banking payments in 2022, representing a 171% increase from the previous year. However, the growth rate was expected to slow to around 130 million payments in 2023, a 90% increase. One of the main challenges has been the limited acceptance points for open banking payments. Traditional payment methods such as cards and direct debits still dominate, partly due to incentives within the banking sector that favor these methods. Nonetheless, open banking payments doubled by mid-2023 compared to mid-2022, with one in nine British customers utilizing this format (Gilbert, 2024). This indicates a growing, albeit slowing, adoption rate.

Operational Principles

Open Banking UK operates on the principle of data sharing. Instead of retaining customer data exclusively, banks now share this information with third parties. This shift allows third-party providers to develop customer-oriented applications using the data extracted from bank databases. These providers make API calls to retrieve the necessary personal information, which they then use to create applications that enhance customer experiences (Taaffe, 2023). This open data approach drives innovation and ensures that customers benefit from a broader range of financial services tailored to their needs.

Innovative Financial Services

The open banking framework in the UK has led to a surge in innovative financial services. Account aggregation tools allow customers to view all their financial information from multiple banks in a single interface, making it easier to manage finances. Budgeting tools leverage transaction data to provide insights and help users plan their expenses better. Alternative lending options have emerged, offering more personalized loan products based on comprehensive financial data rather than just credit scores. These innovations have significantly improved consumer financial management and provided new business opportunities for FinTech firms.

Future Outlook

Looking ahead, the future of open banking in the UK will likely involve overcoming the current challenges and expanding the acceptance points for open banking payments. Efforts to integrate open banking more seamlessly with existing financial infrastructure will be crucial. Additionally, regulatory bodies and financial institutions may need to collaborate more closely to incentivize the adoption of open banking solutions over traditional payment methods. Continuous technological advancements and regulatory adjustments will play key roles in sustaining the growth and effectiveness of open banking in the UK. In summary, open banking in the UK has revolutionized the financial sector by fostering innovation and competition. Despite facing challenges such as limited acceptance points and slower growth rates, the framework has seen significant adoption and continues to evolve. By balancing regulatory support and market-driven initiatives, the UK remains at the forefront of the global open banking movement, driving consumer empowerment and financial inclusion.

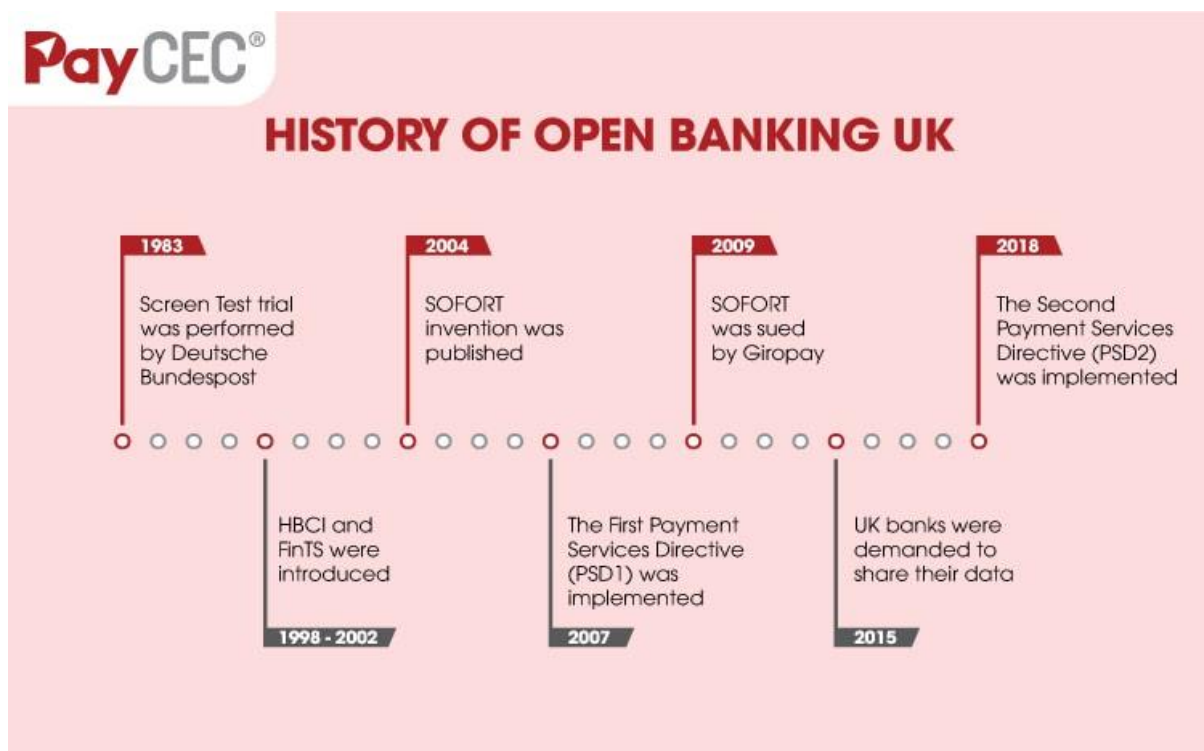


Figure 10: History of Open Banking UK (Source: PayCEC)

Third Party Providers in Open Banking

Third-Party Providers (TPPs) are businesses and organizations authorized by banks and customers to access their information. They include financial service companies, technology businesses, or FinTech corporations that require banking data to develop their services. TPPs play a crucial role in the open banking ecosystem by enabling a wide range of innovative financial services. There are two main types of TPPs in open banking:

Payment Initiation Services Provider (PISP)

Customers authorize Payment Initiation Services Providers (PISPs) to make payments on their behalf. With the help of PISPs, customers do not have to access their bank accounts or use their credit and debit cards whenever they want to make a payment. Once customers have approved a PISP, the provider can withdraw money directly from their accounts. This process facilitates the smooth handling of recurring payments. Customers no longer need to remember to pay bills every month, as invoices are settled by the PISP (Premchand and Choudhry, 2018).

Managing these third parties is straightforward. Customers using multiple bank accounts can easily select which account they want for automatic payments. They can also set up a payment limit for the account and the PISP, helping to control their expenses. Businesses benefit

significantly from payment initiation because it simplifies the payment journey, allowing customers to make purchases repeatedly without any hassle. This convenience and efficiency of PISPs lead to a much lower cart abandonment rate and better conversion rates for businesses. Open Banking Payments UK is diversifying with the presence of these PISPs, enhancing the payment experience for both customers and businesses (Mackintosh, 2024).

Account Information Services Provider (AISP)

Account Information Services Providers (AISPs) are another crucial type of TPP in the open banking framework. AISPs aggregate financial data from various accounts held by a customer across different banks. By doing so, they provide a comprehensive view of a customer’s financial situation. This aggregation enables the creation of tools that offer deep insights into spending patterns, budgeting, and financial planning. AISPs can help customers manage their finances more effectively by providing detailed analytics and personalized advice based on their complete financial data. This comprehensive view of financial data empowers customers to make informed financial decisions.

AISPs are beneficial for both consumers and businesses. Consumers gain better control over their finances, while businesses, such as financial advisors and personal finance management apps, can offer more tailored services. For instance, an AISP can alert customers about potential overdraft situations, suggest ways to save money, or provide investment recommendations. This added value enhances customer satisfaction and loyalty, driving further adoption of open banking services.

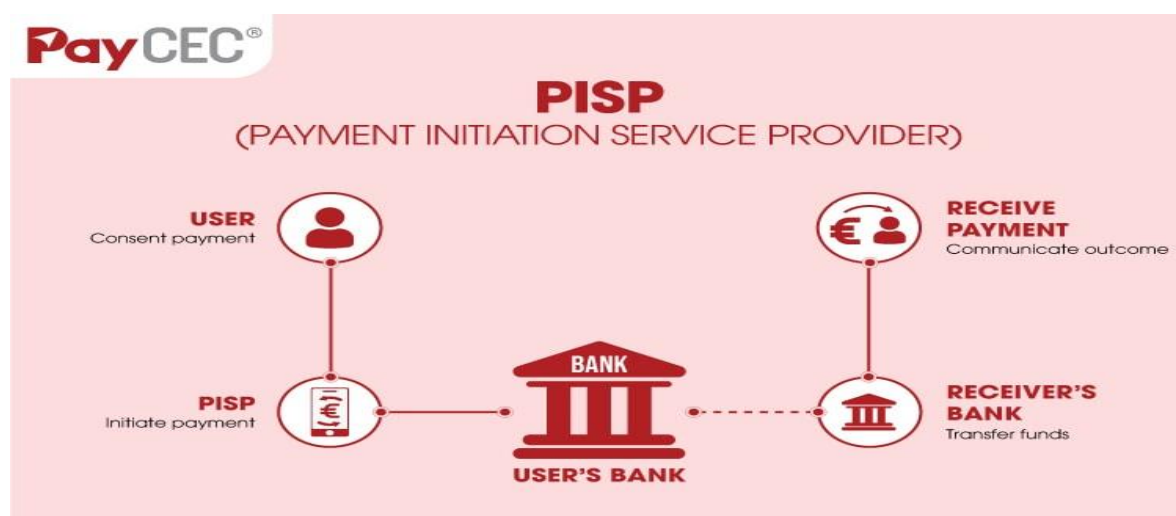


Figure 11: The Payment Initiation Service Provider (PISP) Explained (Source: PayCEC)

Account Information Service Provider (AISP)

Once consented by customers, the Account Information Service Providers will have a hold of all their banking details. However, unlike PISPs, AISPs are on ‘read-only’ mode, they don’t have the right to make payment or move money out of customer accounts. An AISP can only view, manage, and transfer customer information.

No matter how many accounts a customer may have, the AISP can gather all of their data in one place. Thereby, giving a transparent overview of that customer's financial status. In case that customer wants to apply for a loan, or extend their credit card payment limit, or in need of financial assistance, banks can quickly and easily grant their wishes. In the past, the data collection and data analysis process can take up a lot of time and effort for both bank and customer. But now, with the help of open banking and AISP, customer’s transaction history, their earnings and expenditures, can accurately and almost immediately be extracted by banks. In order to do this, the United Kingdom AISPs are supported significantly by the Open Banking API providers UK (Premchand and Choudhry, 2018).

By having access to this massive amount of data, AISP can analyse, understand, and learn more about customer behaviour. This gives them more opportunities to find valuable insights from consumers than ever before. Therefore, helping businesses develop much more customer-oriented products, tailored customer services, and boosting personalized marketing.

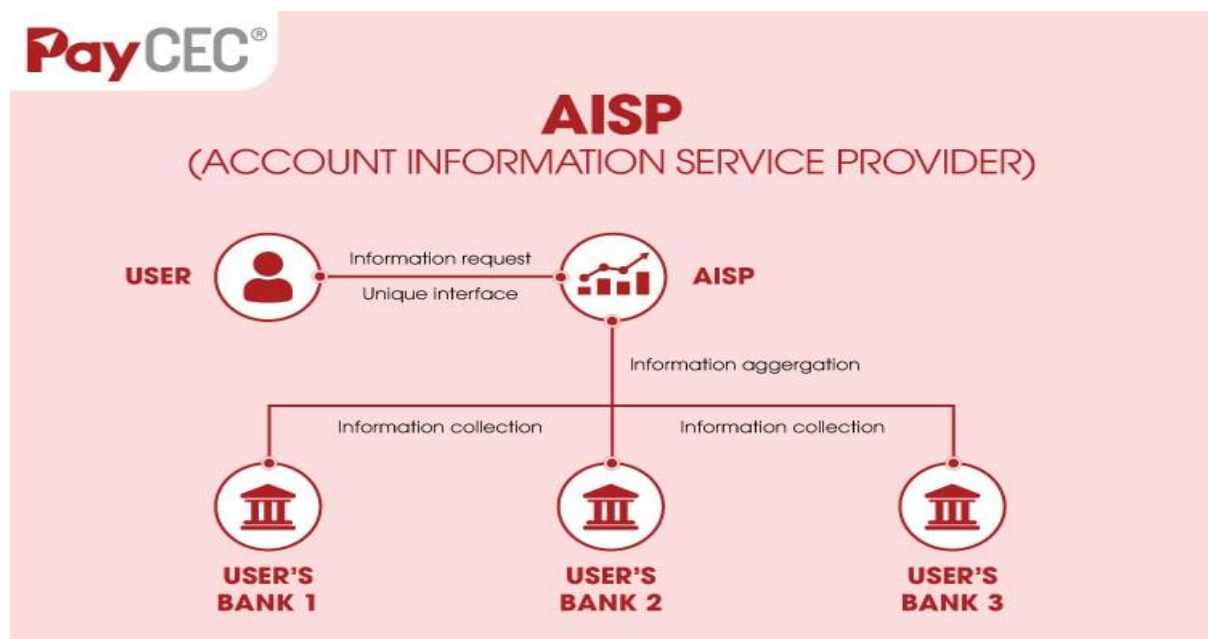


Figure 12: The Account Information Service Provider (AISP) Explained (Source: PayCEC)

Open Banking API Structure

API (Application Programming Interface) is a set of codes and protocols that connects computers, applications, and software to each other. In other words, software will use application programming interfaces to communicate with one another and exchange information (Gogia, 2022).

Open Banking API UK, same as other countries, works like this. When developing software, the third-party providers will need a lot of personal info to make a customer-oriented application. Therefore, they will call API to extract information from external servers. For example: When a TPP needs a customer's transaction history, it will submit a request to an API Banking. That API will retrieve the requested information from the bank database and get it back to the TPP. This process is termed an API call (Premchand and Choudhry, 2018).

Open Banking API Providers

There are hundreds of authorized providers active nowadays in the United Kingdom. The number of Open Banking third party provider registrations in Europe has increased up to 4 times within the last year (2019 - 2020). This shows that UK Open Banking is at its peak and will continue to grow in the future to come.

With the rise of technology, many companies are fighting for the market of providing API across the United Kingdom. A list of popular and top-performing API Open Banking platforms in 2023 in the UK, as highlighted in a report by Clere (2023), is as below.

- **Token:** Token is developing an account-to-account (A2A) payments infrastructure powered by open banking. This system allows consumers to make payments directly through their bank at the point of sale, bypassing traditional methods like credit cards. Token boasts 80% connectivity with banks across 16 European markets, offering a payment method that is both instantaneous and cost-effective.
- **Salt Edge:** Salt Edge offers an open banking API solution that enables clients to provide smarter digital services to their customers. Based in Canada, the company highlights several key use cases for B2B open banking, including SME lending, digital accounting, treasury management, business finance management, and automation, as well as business banking. Led by Garri Galanter, an experienced banking professional,

Salt Edge has been a significant player in the open banking landscape since its advisory inception in 2013.

- Tink:** Tink supports over 300 banks and fintechs, including major names like PayPal, Stripe, American Express, and ABN Amro, by facilitating engagement with open banking. With around 6,000 integrations, Tink helps attract new customers and improve operational efficiency. The Stockholm-based company handles over 1 billion API calls monthly, with a 99.9%+ uptime, highlighting its reliability and scalability since its founding in 2012.
- TrueLayer:** TrueLayer, headquartered in London, is heralded as "Europe's leading open banking payments network." The company excels at creating seamless connections between banks, consumers, and brands, fostering more meaningful financial interactions. TrueLayer's innovative technology solutions empower money management apps and fintech companies to transfer funds quickly, enhance ecommerce merchants' sales and customer loyalty, and facilitate smooth transitions between fiat and decentralized finance for crypto innovators. Their impressive client roster includes prominent names such as Freetrade, Nutmeg, OakNorth, Revolut, and Coinbase.
- Bud Financial:** Founded in 2015, Bud Financial began as an education platform and has since evolved into a comprehensive data intelligence platform. Bud's mission is to help financial institutions, and their customers gain deeper insights into their financial health. By transforming transactional data into actionable insights, Bud simplifies financial decision-making processes. The company boasts a team of over 100 employees across four countries and processes 300 million transactions monthly. This vast amount of data enables Bud to provide valuable insights that benefit both financial institutions and their customers.

In addition to the platforms highlighted above, there are other Open Banking API providers in 2023 worth mentioning below Clere (2023).

- Finflux:** Finflux, headquartered in India, offers a comprehensive suite of cloud-first lending services tailored to help financial institutions provide a modern lending experience. Their approach is highly effective, partnering with over 100 institutions to manage a loan portfolio worth approximately \$9 billion, benefiting more than 20 million borrowers across 15+ countries. Finflux aims to enhance financial inclusion and

access to quality financial services, particularly credit, which aligns with the core goals of open banking advocates.

- **Yodlee:** Yodlee provides a robust platform for data aggregation and analytics, which serves as the cornerstone for open banking innovation. Their products and services are utilized by over 1,500 financial institutions and fintechs, including 15 of the top 20 US banks, reaching a total of 30 million customers. Yodlee's data insights enable financial firms to gain a deeper understanding of their clients, uncovering new business opportunities, better understanding risks, and offering personalized advice. Acquired by Envestnet in 2015, Yodlee continues to drive significant advancements in financial data solutions.
- **DirectID:** DirectID leverages open banking data to assist lenders in making more informed credit and risk decisions. By accessing a consumer's transaction history, lenders gain a clearer view of financial situations compared to traditional credit scoring methods. This enhanced insight helps lenders scale their operations, improve efficiency, reduce risk, and create fairer outcomes for borrowers, making credit accessible and fair.

Overview on UK Regulation and PSD2

Open Banking in the UK is primarily regulated by the Competition and Markets Authority (CMA), the Financial Conduct Authority (FCA), and the Payment Systems Regulator (PSR). The initiative began with the CMA's mandate to the nine largest UK banks (CMA9) to develop a secure framework for sharing customer data with third-party providers (TPPs). This framework aims to foster competition within the financial sector (C&MA, 2021).

The Open Banking Implementation Entity (OBIE) was established to oversee the implementation and standardization of Open Banking APIs, ensuring security and interoperability. The FCA plays a critical role in supervising the compliance of TPPs with data protection and consumer consent regulations, while the PSR focuses on the payment systems' integrity and efficiency. As Open Banking progresses beyond retail banking, a collaborative effort among these regulators ensures a cohesive strategy. This includes establishing clear regulatory expectations and developing a robust governance framework for the future. The overarching goal is to promote financial inclusion, enhance customer experience, and drive competition and innovation within the UK's financial ecosystem (JROC, 2023).

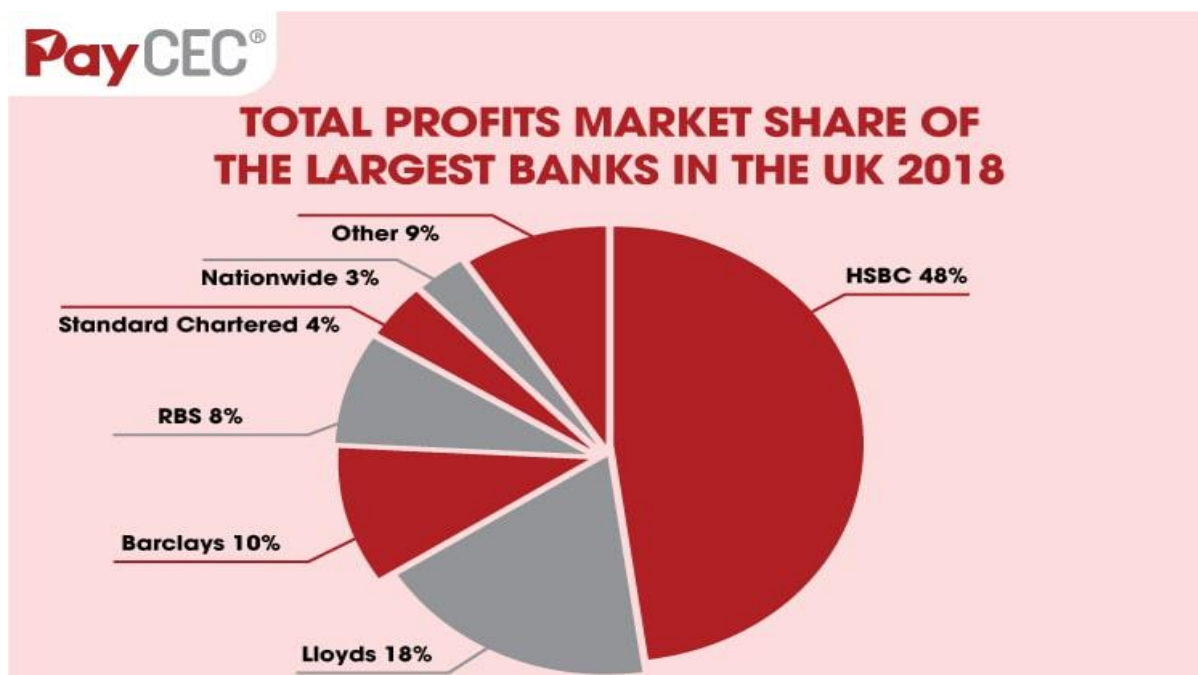


Figure 13: Total Profits Market Share of UK Largest Banks 2018 (Source: PayCEC)

Nine of the biggest banks in the United Kingdom are compliant with the PSD2 Open Banking UK. These banks are a part of the CMA 9, Competition and Markets Authority, consisting of Lloyds, HSBC, Nationwide, Santander, Barclays, RBS, Danske, Bank of Ireland, and Allied Irish Bank. They are the banks of more than 90% of the UK population. Their significant number of users made their databases extremely rich and informative. Hence, the CMA9 are made to share their financial information with non-banks organizations in a secure and standardized manner (JROC, 2023).

These banks have to find a way to release their data smoothly, but also have to protect customer accounts safely, so they call for the help of Open Banking UK API. The extended PSD2 mostly require banks to use API for Open Banking, and elaborate the role of Third-Party Provider, separate it into two:

- The AISP - Account Information Service Provider.
- The PISP - Payment Initiation Service Provider.

United Kingdom has comprehensive open finance policies and frameworks as part of its Smart Data initiative, along with top notch regulatory sandbox testing mechanisms. UK also

implemented amended Electronic Money, Payment Services and Payment Systems (EPPRs) post EU exit to strengthen its data sharing directive.

Future Outlook

The prime time for Open Banking in the UK is now, driven by the rapidly increasing use of online banking across Great Britain. A 2021 report by the Competition & Markets Authority (CMA) on Gov.UK highlights crucial considerations for the future governance of Open Banking in the UK. It underscores the importance of coordinated efforts with the CMA, Financial Conduct Authority (FCA), and Payment Systems Regulator (PSR) to establish clear, long-term regulatory expectations. Among various recommendations, UK Finance has proposed the creation of a new organization, dubbed the 'Future Entity,' to replace the Open Banking Implementation Entity (OBIE) and cater to a broader spectrum of institutions.

This transition presents an excellent opportunity for new financial corporations and technology companies to enter and thrive in the market. The future of Open Banking in the UK is expected to be incredibly promising, with continual innovations and advancements. Open Banking has already paved the way for numerous innovative products and creative financial solutions, and its future is poised to be even more remarkable.

The emergence of new technologies daily further amplifies the benefits of Open Banking, ensuring that its evolution will continue to deliver groundbreaking advancements and solutions. The sector is set to witness significant growth and transformation, heralding an era of enhanced financial services and opportunities.

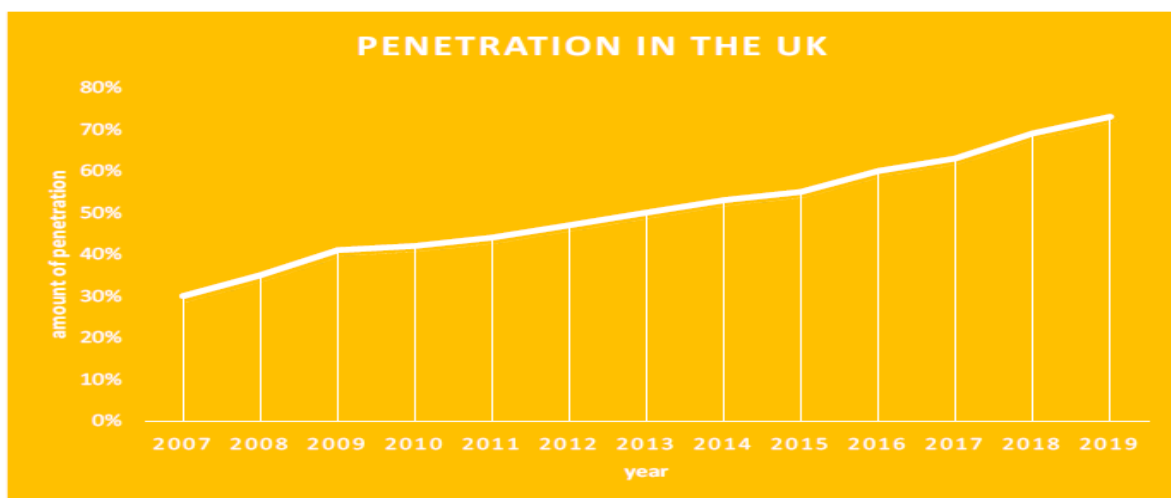


Figure 14: Penetration of Open Banking in the UK from 2007 to 2019 (Gogia, 2022)

Fintech companies play a crucial role in expanding acceptance, but they face resistance from banks. The Treasury's focus on regulation and consumer protection may not address these issues effectively. Projections estimate 206 Mn Open Banking payments in 2024, a 59% increase from 2023, but this falls short of the necessary growth to reach 1 Bn payments annually by 2025. Achieving deeper product-market fit and expanding variable recurring payments usage are seen as crucial for Open Banking's success (Light, 2024).

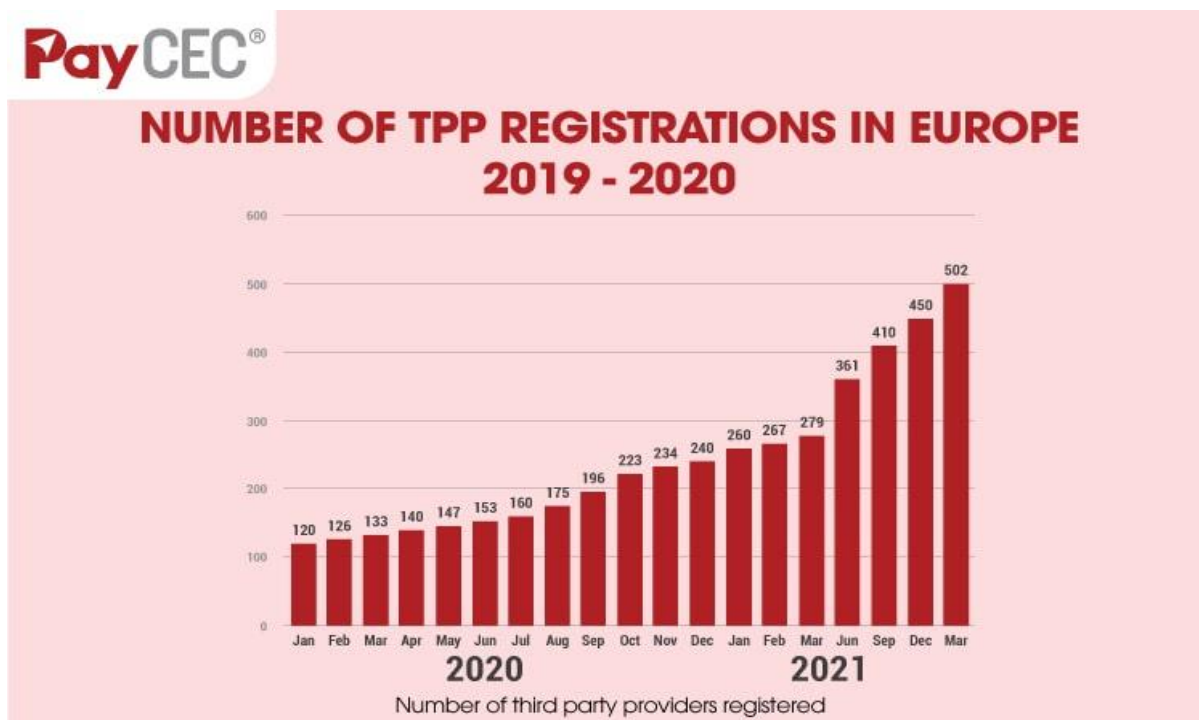


Figure 15: Open Banking Third Party Provider Registrations in Europe (Source: PayCEC)

A study by Zachariadis and Ozcan (2017) calls for a shift in mindset for traditional banks from a closed model to a more open and secure framework, in order to realise open banking growth in the future. Banks, which have historically operated as closed systems, will need to learn how to collaborate and share customers with platform partners. This transition involves restructuring internally to become more agile.

As per Zachariadis and Ozcan (2017), regulatory changes are driving the open banking transformation, but many regulations are still in the rudimentary stages, and standardization across Europe is inconsistent. Brexit, and the subsequent departure of the UK from the EU may further delay developments, causing some banks to adopt a cautious approach. Despite this uncertainty, it's crucial for banks to start adapting now.

Open Banking in India

Rise of Open Banking in India

A study by Fang and Zhu (2023) aims to study empirical evidence in BRICS for the rise and growth in Open Banking. The study presents empirical evidence on the impact of open banking policies in BRICS countries, attributing government-led open banking policies to increase individuals' propensity to secure loans from informal banking entities. However, the paper also cautioned on the impact on traditional banks by open banking – mainly their contraction in consumer loan business due to open banking policies.

Despite these issues, the rapidly developing economies of the BRICS nations could serve as a blueprint for other emerging markets. While open banking offers more choices and promises increased financial inclusion to consumers, it also challenges legacy financial institutions to restructure and innovate to stay competitive (Fang and Zhu, 2023).

India, being a leading BRICS member, is experiencing a continuous revolution in the FinTech sector and its composite categories – notably open banking. Traditional banking services in India are under pressure to transform to a virtual model to meet the needs of tech-savvy customers, as per Sivathanu (2019). While the Indian banking industry has been traditionally conservative, adopting technological changes later than other sectors, the recent adoption of FinTech technology to improve customer service, data management, and process efficiency has been noteworthy. Some benefits of the format in the Indian market are manifested in the form of enhanced customer experience, cost reduction, increased revenue, development of new products and services, and the creation of new business models

Sivathanu (2019) highlights some factors attributing to the rise of open banking in the country. Chief among them is the impact of demonetization. Occurring in late 2016, it led to a significant increase in digital financial transactions, with notable growth in debit card usage and UPI transactions. This shift has driven consumer adoption of digital payment systems. Another chief factor lies in the government's efforts to boost digital adoption in financial systems. Launched in 2015, the Digital India program aims to transform India into a digitally enabled society, fostering a conducive environment for digital banking, including open banking.

Rastogi et. al. (2023) argues for Open API for banking (OAB) to be positioned as a critical tool to boost financial inclusion, which is essential for the economic development of the poor. The

authors cited a number of factors which can fuel the widespread adoption of the format, namely mobile integration through which Open Banking can penetrate a wide-host of mobile applications to reach a large audience, and low cost and simple-to-use model through which it can be accessible to unbanked populations.

Open banking penetration in the Indian financial infrastructure, as with the UK, relies on API. Legacy banks allow secure and limited access to third-party platforms (like Cashfree). This allows fintech players to get secure access to their core banking systems. This also allows them to carry out banking functions and access data. They can help customers make transactions, check account information or their balance.

Let us take an example here:

1. ABC Bank opens its core banking system to a third party fintech player. For instance, Cashfree Payments
2. Cashfree Payments integrates with ABC Bank’s API. This allows them to connect to the bank’s core banking system
3. Cashfree Payments makes API calls (basically a request) to the ABC bank’s server to execute financial functions or fetch information
4. Businesses use the single Cashfree Payments API to access multiple banking APIs.

Now, this is a simple explanation of how third-party providers (TPP) can access bank servers (Misra, 2023). To understand open banking API in its essence, we have to understand two major reasons for the growth of open banking and API – namely regulation-driven and market-driven factors.

Regulation-Driven Growth

It is common knowledge that the finance and banking sector is one of the most heavily regulated industries. However, most financial institutions believe that opening up banking data will fuel innovation in the finance sector. This will lead to a better customer experience and wider accessibility of financial services and products (Kulkarni and Dhanwada, 2023).

In some countries, financial institutions (like PSD2) have enforced regulations and banks have to be compliant with those regulations to carry out business. This is the major reason for the growth of open banking and API in Mexico, Australia, and the European Union.

Market-Driven Growth

In a lot of markets, competition is fuelling banks to hop on the open banking bandwagon. In a lot of areas, banks fail to provide the kind of customer experience that fintech players can. Hence, banks have no choice but to collaborate with other finance players to reach a wider set of audience. Moreover, it is important if they want to provide satisfaction to existing customers.

For example, a bank may decide to create an app for their customers' ease of use. However, they can only reach a limited customer range by doing that. They cannot allow customers of other banks to use/access their app due to security reasons. Moreover, they cannot partner with other banks to create a unified solution due to industrial competition. On the other hand, a fintech player is not bound by such liabilities. In fact, they can devise solutions that are accepted by different banks and get access to a much larger customer base (Saritha, 2021).

Types of APIs in Banking

While on the subject of APIs, one can also classify them according to the nature of collaboration they entail. This yields three types of APIs: private, partner and open. Private APIs are exclusively used within a financial institution, allowing internal teams to integrate their systems and services securely. They enable banks to streamline operations, enhance internal efficiencies, and maintain control over sensitive data (Misra, 2023).

Conversely, partner APIs facilitate collaboration between banks and selected third-party partners, such as fintech companies and other financial service providers. These APIs allow banks to extend their services and products to a broader audience through strategic partnerships. Partner APIs are essential for developing value-added services. The last category, open APIs, involves publicly available options designed to enable third-party developers to build applications and services that interact with a bank's data and services. They are the cornerstone of open banking, promoting transparency, competition, and innovation in the financial sector. By using open APIs, banks can provide customers with enhanced services, such as personalized financial management tools and seamless payment solutions, ultimately improving the overall customer experience (Tater and John, 2022).



Figure 17: Three Types of APIs in Banking (Source: Cashfree payments)

Banking as a Service (BaaS)

Banking as a Service (BaaS) is a concept similar to open banking. It involves banks opening up their APIs to FinTech players. However, it goes beyond data sharing. BaaS allows third party players to offer banking offers embedded in their own financial offerings. It is not just about accessing financial data. It is about the functionality of core financial services.

Third-party players use the existing banking products or innovate on financial instruments as needed for business processes. They employ APIs to customize the banking information and infrastructure for specific purposes. BaaS provides customers with a wider variety of financial services. Moreover, it ensures increased transparency. It also increases competition in the financial services domain. Both banks and third-party companies benefit from the augmentation to offer the best services to their customers (Tater and John, 2022).

On the other hand, open banking allows customers to consent to share their data, aiming to increase competition between traditional banks and fintech companies. By enabling better borrower screening, it can enhance competition if it levels the playing field for all lenders. However, it might harm competition and negatively affect all borrowers if it disproportionately benefits FinTech's. This dynamic holds even when borrowers control their data sharing. Additionally, the study examines how fintech affinities and borrower preference data sharing impact lending market competition (He et. al., 2023).

Open Banking API Providers

API-based banking products and services are already gaining traction in the market. Lot of countries have government regulations to enforce open banking. The regulatory frameworks allow third parties to access customer-permission data. These third parties are required to gain licences. The banks have to implement data privacy and consent agreements. Now that we have covered the state of API banking platforms in India, let's have a look at some of the examples below, as highlighted in a report by Monteiro (2023).

Cashfree

A lot of third party FinTech players offer financial services to businesses and enterprises. Cashfree Payments uses APIs to provide enterprise-friendly solutions to businesses that are tailored to their industry needs. For instance, Cashfree offers bank transfer services and payouts as a service for business bank accounts. In fact, these payout services are a strong alternative to Enet HDFC and other such corporate banking platforms.

Cashfree offers 100% online onboarding with dedicated account managers. Moreover, this platform uses API for 100% automation and easy reconciliation. Cashfree's instant payment and instant beneficiary addition features are popular among businesses. As one of the most popular APIs in the country, Cashfree Payments serves over 300,000 businesses, facilitating a wide range of financial transactions such as payment collections, vendor and wage payouts, bulk refunds, expense reimbursements, and managing loyalty and reward programs. In addition to India, Cashfree Payments operates in eight other countries, including the United States, Canada, and the United Arab Emirates, extending its solutions to an international clientele.

YAP

YAP is a next-generation open banking API platform. It offers debit and credit cards, prepaid accounts, UPI payments, and cross-border remittances through AI-driven APIs. Banks integrating their APIs can develop and build their own branded financial instruments catering to specific customer needs.

OCEN

Open Credit Enablement Network (OCEN) was launched on 22nd July 2020 to reimagine the digital lending flow in India. Loan Service Providers (LSPs) leverage standardized APIs to

create new types of loan offerings. The protocol will help bridge the credit gap present due to the traditional lending setup.

Other emerging API models are also making noteworthy progress. The YES Bank partnered with fintech startups with an accelerator program. Moreover, it has created a chat-based payment service. Axis Bank has established an accelerator program, an in-house incubator program and even a social networking space for startups. State Bank of India enables customers to make transactions through their fingerprints and Aadhar number. This is possible through Aadhaar Enabled Payment System (AEPS) These examples make one thing clear. Open banking APIs have a huge role in fuelling FinTech growth. In fact, because of this, a lot of fintech players offering customer-friendly finance solutions have come up.

M2P Solutions

M2P Solutions is a platform specializing in financial services APIs tailored for banking and payment products across the Middle East and Asia. Established in 2015, M2P has formed partnerships with over 500 FinTech firms and 30 banking institutions, continuously expanding its portfolio. The company acts as an ecosystem enabler, collaborating closely with banks and financial entities to provide comprehensive program management through a suite of APIs.

Setu

Setu is dedicated to driving India's economic growth by enhancing accessibility and affordability of financial services. Specializing in open banking aggregation APIs, Setu collaborates with financial institutions to create and manage accounts efficiently. Recognizing the technological limitations faced by banks, insurance companies, and lending firms, Setu simplifies integration complexities, allowing these businesses to focus on their core products rather than technical challenges.

Regulation & Case of UPI

In India, intermediaries licensed as Non-Banking Financial Companies (NBFC) are responsible for customer consent management. Moreover, an Account Aggregator (AA) is a licensed entity that connects a Financial Information Provider (FIP) (Eg. Banks) to Financial Information User (FIU). AA connects these two entities through APIs (Rost, 2023).

The transfer of any personal customer data is regulated strictly in India. There are appropriate agreements between the customer, the AA and the financial information providers. Moreover,

data cannot be stored or used by aggregators for any other purpose. All AAs have to keep explicit data security policies and customer grievance redressal systems in place.

Open banking in India is regulated primarily by the Reserve Bank of India (RBI) through various initiatives and guidelines aimed at fostering innovation, ensuring security, and promoting financial inclusion. The RBI introduced the Account Aggregator framework in 2016 to facilitate the sharing of financial data among financial institutions in a secure manner. Account Aggregators are entities that enable customers to consolidate and access their financial information across different financial institutions through a single platform (Misra, 2023).

The RBI has established regulatory sandboxes to encourage fintech innovation. These sandboxes allow startups and financial institutions to test new products and services in a controlled environment under the regulator's supervision. This initiative helps in identifying and mitigating risks associated with new technologies while promoting the development of open banking solutions (Shukla and Dubey, 2022).

Unified Payments Interface (UPI)

Managed by the National Payments Corporation of India (NPCI), UPI is a real-time payment system that facilitates inter-bank transactions. It has been a cornerstone of India's open banking ecosystem, enabling seamless money transfers and payment services. UPI's open API architecture allows fintech companies and banks to develop innovative payment solutions, driving competition and improving customer experience.

As argued by Gilbert (2024), UPI payments in India are widely utilized for various transactions, from buying a mango lassi at a roadside stall to purchasing an iPad at the Apple Store. It allows smartphone users with a bank account at a participating bank to make direct payments to businesses by setting up a UPI profile and linking their bank account.

Merchants particularly benefit from UPI due to its instant settlement feature and predominantly free transaction processing. The adoption of UPI has been exceptionally successful, as evidenced by RBI data showing that for every Rs100 spent using debit cards in the year ending March 2023, Rs1,900 was spent via UPI. Recent NPCI statistics from January 2024 highlight a record Rs18.4 trillion transacted through UPI, marking a 52% increase from January 2023 and solidifying it as one of the most widely used payment systems globally (Gilbert, 2024).

UPI forms part of India Stack, a government initiative aimed at enhancing financial inclusion, and aligns with the country's approach to open banking, complemented by its identity and data elements (Tater and John, 2022). This interface, supervised jointly by the RBI and the NPCI can enable strict supervision of all open banking related activity in the country that flows through its' channels – outlining an effective regulatory environment in which to foster and grow the impact open banking can have on the economy.

Future Outlook

Open banking is asserted to be rapidly evolving and implementing in the Asian continent, ranging from South Asia to Southeast Asia and the Pacific regions (Kapron, 2022). The future of open banking in India appears promising and transformative. With the rapid adoption and success of UPI as a cornerstone, India is poised to further integrate open banking principles into its financial ecosystem. This evolution is expected to enhance competition among financial institutions, foster innovation in financial services, and expand financial inclusion by leveraging technology to reach underserved populations (Misra, 2023).

Regulatory support from entities like the Reserve Bank of India (RBI) and the National Payments Corporation of India (NPCI) will likely continue to play a crucial role in shaping this future, ensuring that security, interoperability, and consumer protection remain paramount (John and Tater, 2022). As more fintech firms and traditional banks embrace open banking APIs, consumers can anticipate greater convenience, more personalized financial products, and a robust digital payments infrastructure that supports a diverse range of economic activities across the country (Sivathanu, 2019).

Open Banking API Challenges

Despite so many benefits, assessing from the in-depth look at the open banking sector in the UK and India, the innovative format presents a number of challenges which must be addressed for successful future growth and financial penetration. Let's have a look at some of them below.

Data Security and Financial Privacy

Large-scale adoption of open banking has to be preceded by strong privacy laws and data protection bills. These laws establish rules for third party use.

Why are they important? Because there are a lot of risks ranging from money laundering and data theft to terrorist financing. Some laws are already in place for the same. For instance, the Personal Data Protection Bill of 2019, aims to protect individuals' data.

Customer Rights

The absence of grievance redressal systems severely hampers customers' rights. Moreover, they erase the bank or third party's liability in case of fraudulent activity. The RBI issued Customer Rights in December 2014 which lists laws for the protection of customer's right to grievance redressal and compensation. Moreover, the right to privacy ensures that customers' personal data remain private except in case of specific consent.

Compliance Risk

Open banking mandates high compliance with privacy laws and prudential regulations. Compliance risk can arise due to penalties or damages due to supervisory actions. Moreover, they can also be caused due to an action/inaction of a third-party service provider.

Cybersecurity Risks

With the expanse of open banking and data-sharing, comes increased cybersecurity risks. Any loss to a customer due to a data breach would require the bank or financial institution to compensate for the same. Issues like falsification and malware are equally threatening.

Eight Imperatives for Success

IT modernization

Legacy infrastructures create multiple dependencies and delay the execution of projects. An API-led approach enables more hybrid integration and reduces the risks associated with ongoing transformation. APIs focus on efficiency gains by breaking down workloads into smaller projects. It works on shared resources and libraries, increasing the speed of innovation.

Developer platforms and sandboxes

Industry players must future-proof products and services in a simulator environment, i.e., identical to real-world scenarios, by testing end-to-end customer journeys and seeking practical guidance for improvement. Most countries in the Champions category have regulator-driven sandboxes that provide a controlled environment to test new ideas and concepts before going live. This approach identifies any anomalies, risks, and conflicts of interest.

API architecture and lifecycle management

Each layer in the API management architecture carries its own set of stakeholders and costs. Building an API architecture involves more than just developing functional APIs. It is about developing a plan to resolve stakeholder concerns and constructing reliable infrastructure to support new digital platforms. Banks need to have API-led information architecture to support secure data access models, outline the scope of use, and ensure authorization throughout the product and service lifecycle. Banks can also refer and adopt standard country-specific API frameworks to build an efficient approach rather than creating APIs from scratch. For e.g., Data Standards Catalogue and Cross Government UK API Catalogue. A robust, resilient approach to API management is necessary to withstand both immediate and long-term volatilities.

Revenue sharing models

To deliver better customer propositions, the new wave of digital only players increasingly unbundles products into micro-products or services or re-bundle offerings with components from other providers. The ability to reinvent and "package" attractive propositions wholly centred on the needs and preferences of customers will drive future growth. Banks need to create revenue sharing models that clearly define the distribution scope and customer relationship, reducing the cost of new customer acquisition and pressure on interest incomes.

Partner ecosystems

Banks must develop ecosystem strategies that equip them with the speed, size, and unique offerings to compete in the digital sphere. This will help them build stronger customer relationships and earn higher wallet share. Digital ecosystems enable banks to become more efficient by giving them access to innovative capabilities that would otherwise be prohibitively expensive to develop or operate on their own.

Data strategy

Sharing data with other financial institutions as a data provider may not be a viable growth strategy in the open finance era. This poses significant churn risk as customers can simply switch services based on the value they provide. To ensure robust progression in open finance evolution, banks must implement a holistic data and analytics strategy as a catalyst in delivering more contextual and connected customer experiences.

Data monetization

Banks are custodians of massive amounts of customer data and have an invaluable opportunity to build customized value propositions for their customers. They can utilize the data to generate insights on customer behaviour and understand how macroeconomic factors impact saving and spending patterns in creating hyper personalized value propositions. Third-party providers benefit significantly from using this quantum of customer data and combining it with datasets such as social media interactions, digital IDs, and geographical data.

Security

Open finance raises serious concerns about consumers' financial privacy and financial security. Customers' account information could be vulnerable to malicious third-party apps, data breaches, fraud, hacking, and insider threats. Banks must implement a robust application security strategy for 360-degree protection of customer data that goes beyond testing for software vulnerabilities and provides secure customer experience.

Conclusion

Open banking and its broader evolution into open finance represent a paradigm shift in the global financial ecosystem, driven by principles of data sharing, innovation, and enhanced consumer empowerment. Initially conceptualized to enable secure access to banking data through APIs, open banking has evolved into a catalyst for product innovation, operational efficiency, and improved customer experiences across financial services. The global adoption of open banking, as exemplified by regulatory frameworks like PSD2 in the EU and the Consumer Data Right in Australia, underscores its transformative impact on financial inclusion, competition, and market dynamics.

In the UK, open banking has undergone a transformative journey since the introduction of the Open Banking Standard in 2018. This initiative has fostered a dynamic ecosystem of fintech innovation, leading to the development of new services such as account aggregation, budgeting tools, and alternative lending options. Despite initial growth challenges and regulatory complexities, open banking payments have gained substantial traction, although at a slower pace than initially anticipated. The landscape is bolstered by Payment Initiation Service Providers (PISPs) and Account Information Service Providers (AISPs), which facilitate seamless transactions and empower consumers with financial insights. Supported by robust API infrastructure and stringent regulatory oversight from entities like the CMA, FCA, and PSR, UK open banking continues to evolve, promising increased financial inclusion, competition, and customer-centric solutions. The future of UK open banking appears promising, with ongoing advancements in technology and regulatory frameworks set to unlock further innovation and market potential.

Similarly, the rise of open banking in India reflects a transformative shift in the country's financial landscape, driven by regulatory mandates and market dynamics. Studies underscore its potential to enhance financial inclusion through increased access to services and products, catalyzing economic growth. Despite initial challenges such as the impact on traditional banking models and regulatory compliance, India's progressive adoption of open banking APIs, exemplified by initiatives like UPI and the Account Aggregator framework, signifies a paradigmatic leap towards digital financial services. This evolution empowers consumers with seamless payment solutions and fosters innovation, enabling both fintech startups and traditional banks to collaborate and innovate. Continued regulatory support from entities like

the RBI and NPCI is pivotal, ensuring that open banking in India evolves securely and inclusively, paving the way for a more competitive and dynamic financial ecosystem that benefits all stakeholders.

Looking ahead, the future of open finance promises continued growth and adaptation, fueled by advancements in technology and regulatory frameworks that support interoperability and consumer protection. Financial institutions, fintech firms, and other stakeholders are leveraging open banking to develop personalized financial products, streamline operations, and expand access to underserved populations worldwide. While challenges such as data privacy, regulatory compliance, and technological integration persist, the benefits of open banking in fostering economic efficiency and innovation are increasingly recognized globally. This evolving landscape holds the potential to redefine the financial services industry, driving economic growth and enhancing financial inclusion on a global scale.

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