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Oversight and supervision in open finance

Considerations for African regulators

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Authors

Joshua Cedras

Ashly Hope

Amina Khan

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Cenfri South Africa

Tel: +27 21 913 9510
Email: info@cenfri.org

The Vineyards Office Estate
Farm 1, Block A
99 Jip de Jager Drive
Bellville, 7530
South Africa

PO Box 5966
Tygervalley, 7535
South Africa

Cenfri Rwanda

Tel. +250 788 312 132
Email: info@cenfri.org

West Wing,
Kigali Heights
@ 7th Floor
KG 7 Ave
Kigali, Rwanda

www.cenfri.org

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List of acronyms and abbreviations

AISP	Account information service provider
FSP	Financial service provider
TPP	Third-party provider
AISP	Account information service provider
USSD	Unstructured Supplementary Service Data
API	Application programming interface
ACCC	Australian Competition and Consumer Commission
CDR	Consumer Data Right
OAIC	Office of the Australian Information Commissioner
FCA	Financial Conduct Authority
AISP	Account Information Service Provider
PISP	Payment Initiation Service Provider

Preface

For millions of people across the Global South, the proof of their financial reliability exists scattered across mobile wallets, savings groups, and informal ledgers. If this data is connected and accessible, financial service providers can use it to design and tailor financial products and services for the unbanked and underbanked, unlocking the value that isolated data fragments never could.

The "Data Governance in Africa" Team Europe Action, co-funded by the European Commission and five EU Member States, supports African countries and regional institutions in building and strengthening human-centric and development-oriented data economies. Specific Objective 2 of the Action focuses on data value creation. In this context, the Data Economy Initiative at GIZ has worked with Cenfri and other partners to support the development of open finance and responsible financial-sector data sharing across different African markets that would leverage scattered datasets to promote financial inclusion.

The collaboration took shape across South Africa, Kenya, and Rwanda. In South Africa, the initiative supported an open finance readiness assessment in collaboration with the Intergovernmental Fintech Working Group (IFWG), looking at the regulatory, infrastructure, supply- and demand-side conditions for open finance and possible pathways for implementation. In Kenya, support to the Central Bank of Kenya, in partnership with CGAP, contributed to a comprehensive readiness assessment and the development of an implementation roadmap. In Rwanda, where work on open finance was already more advanced, the focus was on implementation support, including engagement with relevant institutions and the development of a financial-sector data repository with the National Institute of Statistics Rwanda. The repository is intended to improve access to market-relevant data and support fintechs and other actors in better understanding the markets they serve.

Additionally, the initiative has supported regional engagement and strengthened local capacities. This has included convening regulators and central banks from across the East African Community to exchange experiences, explore the opportunities and risks associated with open finance, and discuss the enabling conditions required for implementation. These discussions have also highlighted the importance of regional coordination as countries begin to explore open finance at different speeds and in different ways.

As the work has progressed, it has become increasingly clear that developing an open finance framework is only part of the task. Regulators also need to consider how an open finance ecosystem will be overseen once it becomes operational, how emerging risks will be identified, how consumers will be protected, and how they will assess whether open finance is delivering the outcomes it was designed to achieve.

This publication, Oversight and Supervision in Open Finance: Considerations for African Regulators, was developed by Cenfri as part of this broader collaboration. It builds on the work undertaken through the Open Finance Initiative by focusing on the oversight and supervisory questions that become increasingly important as countries move from exploration and policy design towards implementation and scale.

The publication does not propose a single model for open finance supervision. Instead, it provides practical considerations that regulators can adapt to their own market structure, institutional arrangements, regulatory capacity and stage of implementation. In doing so, it aims to contribute to the wider objective of supporting open finance ecosystems that are not only technically functional, but also well governed, trusted and able to deliver meaningful value for consumers and the wider financial sector.

Juan Carlos Guzmán Hidalgo
Project Lead

1 Introduction

Open finance matters in Africa. It can turn growing digital financial data into better products and services for underserved consumers, while supporting broader inclusion and market-development goals. Open finance is the exchange of consumer data, with consumer consent, between financial service providers (FSPs) and third-party providers (TPPs) to provide tailored financial goods and services. It supports competition and financial inclusion by reducing data silos, enabling fintech innovation, and helping providers design products that meet end-users' needs and realities. It also gives consumers greater visibility and control over their financial data. These benefits are especially relevant in Africa, where central banks and regulators are increasingly exploring open finance as a lever for inclusion and market development. This is borne out across the continent, with many African countries implementing or considering open finance (Arab Regional Fintech Working Group, 2023; Bank of Ghana, 2024; Bank of Namibia, 2022; Bank of Zambia, 2026; Central Bank of Nigeria, 2023; National Bank of Rwanda, 2024; OECD, 2024; Santosdiaz, 2022). Interest in open finance is driven by the continent's market realities: large, underserved populations, growing digital financial services markets, and expanding consumer financial data trails, especially through mobile money. These conditions create a strong foundation for open finance to unlock personalised and accessible products and services.

Realising the benefits of open finance depends, in part, on effective oversight and supervision. Oversight and supervision is important for ensuring that open finance ecosystems function well, protect consumers, and deliver intended policy outcomes. Cenfri's 2024 publication, *Open Finance in Africa: The Why and the How*, outlines key open finance design considerations for African regulators, including how to assess feasibility, establish governance structures and develop the building blocks for implementation. Good design is a necessary first step, but it is not sufficient on its own. The ongoing success and sustainability of open finance also depends on effective oversight and supervision of the ecosystem and its participants. Effective oversight and supervision supports the functioning of the ecosystem, by identifying and addressing poor participant behaviour, and protecting consumers from harm. In the long-term, it helps regulators and policymakers assess whether the ecosystem is performing as expected and whether implementation is delivering against intended policy outcomes.

In Africa, open finance ecosystems are still nascent, providing regulators with an opportunity to build robust oversight and supervision mechanisms alongside implementation.

The African context

Designing oversight and supervision mechanisms that are fit for purpose requires understanding the conditions in which they will operate: the needs of consumers, the structure of provider markets, and the capacity of regulators.

Consumers. In 2024, there were 710 million unique mobile subscribers on the continent, of which only 416 million were mobile internet users (GSMA, 2025). This gap suggests that open finance needs to accommodate non-internet channels, such as Unstructured Supplementary Service Data (USSD), SIM toolkit[1] or agent-enabled consent journeys, to meaningfully include consumers. Regulators need to develop standards and expectations for feature phone-based consent, for which there is limited global precedent. Financial inclusion is another driving factor for the development of open finance in African markets. This means that outcomes measurement will focus on whether open finance is expanding the range and quality of financial products and services available to consumers. Competition – new entrants and existing participants competing for customers – is the mechanism for enhanced inclusion and thus it is particularly important that African supervisors consider competition in their supervisory work.

1 A SIM toolkit is a set of commands that allows applications stored on a SIM card to interact with a mobile phone and mobile network. It enables simple menu-based services to run on basic phones without requiring internet access. The SIM toolkit can be used to download applications to the SIM in a secure manner (GSMA, 2026).

Providers. Many African financial service markets are relatively small, with a few large institutions dominating the market and relatively few smaller, innovative participants. Supervisors will need to monitor how differing market structures affect participation and implementation, particularly where dominant providers influence access, pricing, technical standards and the pace of open finance adoption. As the ecosystem develops, supervision needs to respond to changes in market size, participation, composition and the balance of power between large providers and new entrants.

Regulators. Regulatory capability and capacity shape the approach to oversight and supervision. Regulators on the continent often have limited resources and access to sophisticated supervisory tools. In addition, while most markets have data protection laws and regulations, these are generally still new and enforcement and oversight are limited. Broader financial services, such as pensions, investments, microfinance, and insurance, are also often split between multiple regulators. This creates coordination challenges where the objective is a comprehensive open finance ecosystem. The small size of some markets and the integration of financial sectors in common monetary areas also require coordinated cross-border approaches to open finance oversight and supervision, so that risks, responsibilities and data-sharing arrangements are managed consistently across jurisdictions.

Scope and terminology

This document focuses on three key areas of open finance oversight and supervision: operational and ecosystem oversight, conduct supervision and outcomes monitoring. Prudential supervision is an important component of financial sector supervision but falls outside the scope of this document. The prudential supervision of most open finance participants, such as banks, will already be well established. Open finance does not introduce new prudential risks to these participants. Although the implications of open finance participation will be relevant to prudential supervisors, the risks fall largely within operational and ecosystem oversight. For new participants, such as account information service providers (AISPs), prudential supervision may not be necessary, due to their limited activities and risk profile. While supervisory practice may typically prioritise entity-level prudential supervision, in the case of open finance, operational oversight and conduct supervision are critical first priorities in ensuring that the ecosystem is functional and widely used.

At a high level, oversight refers to system-wide monitoring of an open finance ecosystem, while supervision focuses on the conduct and compliance of individual participants. For simplicity, this paper uses the term supervision as a collective term encompassing both oversight and supervision.

Overview and how to use this document

This document is a practical tool for African regulators and policymakers who are developing an approach to open finance oversight and supervision. It draws on global practices captured by Dias, Mazer and Jeník (2026), and on broader supervisory principles and practices in digital financial services and adapts them to the realities of Africa's emerging open finance ecosystems.

The document uses key questions to highlight the choices and insights necessary to develop a supervisory strategy for open finance. It is intended to support a proportionate and adaptive approach to supervision, recognising that supervisory priorities will differ across markets and stages of ecosystem development.

To support supervisors consider how supervision changes and supervisory priorities shift as open finance ecosystems develop and expand, this document sets out critical supervisory objectives for each phase of implementation and poses questions to help regulators identify the most appropriate approach to oversight and supervision for their particular market. It is structured as follows:

- **Section 2** describes oversight and supervision in open finance, including key supervisory issues across operational, conduct and outcomes monitoring, and explains how supervisors can calibrate their supervisory posture, objectives, and approach given their regulatory structure, capacity and powers.
- **Section 3** outlines key oversight and supervision considerations as open finance ecosystems evolve, across the four phases of open finance implementation introduced in Open Finance in Africa: The Why and the How, illustrating how supervisory priorities can shift as implementation progresses.

2 What is oversight and supervision in open finance?

Before considering how supervisory priorities evolve across the different phases of open finance implementation, it is important to establish what open finance supervision entails. This chapter introduces three key dimensions of open finance supervision: operational oversight, conduct supervision, and policy outcomes and market development monitoring. It then considers the institutional factors that shape how supervision is undertaken in practice, including supervisory posture, regulatory structure, capacity and powers. Together, these provide the foundation for the phase-specific supervisory considerations presented in the following chapter.

Operational oversight

Operational oversight focuses on whether the system is working as intended. The goal of operational oversight is to ensure that application programming interfaces (APIs) are working properly and are available when needed, data shared is accurate, errors are resolved promptly and operational incidents are addressed. Supervisors oversee ecosystem stability, performance, resilience, and error and dispute resolution processes to prevent operational dysfunction from undermining trust and participation.

Conduct supervision

Conduct supervision ensures that providers are treating consumers fairly, not distorting the market and complying with the rules and obligations of the open finance framework. Supervisors should ensure that consumers have a smooth and safe experience when using open finance-enabled services. While consumer protection is a goal in itself, ensuring that consumers are protected will also increase trust in the open finance ecosystem.

In some cases, conduct supervision relies on the same tools, methods and data as operational oversight, but interprets them through consumer protection and competition lenses. While operational oversight assesses whether systems are functioning as intended, for example, whether APIs are available, data is accurate, and access is being provided, conduct supervision considers whether shortcomings in these areas are leading to unfair treatment, poor consumer outcomes, or other forms of consumer harm. When assessing competition, conduct supervision can require more granular operational data to identify discriminatory pricing or differences in API performance that disadvantage certain participants.

Policy outcomes and market development monitoring

Policy outcomes assessment and market development tracking identify whether open finance is achieving the objectives for which it was designed and whether the ecosystem is developing as expected. This includes tracking whether new use cases are emerging. It also involves checking if participation is broadening across financial service providers and consumer segments. Lastly, it requires assessing whether the ecosystem is achieving its foundational policy goals such as inclusion, innovation, competition or consumer empowerment. While this is not necessarily a typical supervisory role, supervisory teams are often best placed to do this, or to provide support and data to the relevant policy team. For African regulators, who often carry a dual role as supervisor and market developer, measuring policy outcomes will not only help to calibrate the ongoing design of open finance, but will also help to inform supervisory priorities and regulatory improvements.

Communication and coordination

In addition to the three dimensions of open finance supervision, communication and coordination are two particularly important cross-cutting aspects of open finance supervision.

Given that open finance is intended to be cross-sectoral, supervisory coordination is necessary. This is likely to include coordination with the information or data protection regulator, other financial sector supervisors, external recourse authorities, such as ombuds, and communications regulators where mobile money is part of the regime. This could be through formal consultation mechanisms or more informal channels. If the ecosystem incorporates sectors outside the usual purview of the central authority, such as insurers or investments services regulated by separate bodies, oversight should be concentrated in the lead regulator or informed by shared data sets. This may require formal delegations of powers, or agreements on data-sharing or new licensing. In addition, relationships with competition authorities can be important to oversee market dynamics.

Extensive coordination with industry, particularly to define operational aspects that could impact supervision (for example, whether some elements will be centralised in an implementation entity or in the supervisory authority itself) will also be necessary. Within supervisory authorities, coordination is likely necessary across various areas of supervision, including consumer protection/conduct and institutional/entity supervision.

Communication is an important supervisory tool in open finance, with formal guidance around supervisory expectations and direct communication with participants central to effective supervision. Supervisors can also use public communication for accountability and deterrence, such as through periodic reporting on performance or real or near-real time performance dashboards as well as through thematic reporting and enforcement outcomes. Finally, supervisors can use communication campaigns directly to consumers, for example, on how to complain.

Calibrating to context

Before embarking on open finance implementation, it is useful for supervisors to consider where they are positioned and what might need to change to support effective supervision of open finance. The following sections discuss these considerations and conclude with key questions to help regulators assess whether their existing supervisory arrangements are fit for purpose.

Regulatory structure, institutional capacity and powers

Regulatory arrangements shape open finance supervision and oversight in three important ways: through the organisational structures used to coordinate supervision, the powers available to support corrective action and enforcement, and the capacity and expertise available to oversee an increasingly complex and large ecosystem. In developing an open finance supervisory strategy, regulators need to understand the constraints and enabling features of the existing regulatory arrangements and, where necessary and possible, strengthen enforcement tools or expand capacity to meet open finance oversight and supervisory requirements.

Regulators should also consider whether their existing legal powers are sufficient to supervise open finance effectively. This includes powers to obtain information from participants, monitor compliance with operational and conduct requirements, require corrective action, take enforcement measures, and coordinate or share information with other competent authorities where responsibilities are distributed across multiple institutions. Where supervisory powers are fragmented or insufficient, legislative or regulatory reforms may be required to support effective supervision.

Open finance supervision is also inherently cross-cutting. It requires close collaboration across, at the minimum, payments or national payment system departments, banking supervision, consumer protection and cyber risk teams as well as data protection regulators. In some cases, regulators can build on existing cross-cutting functions such as consumer protection, to support this coordination.

There is no single organisational model for open finance supervision. Supervisory capacity must span conduct supervision, data interpretation and technical data skills, However, regulators may embed responsibility within an existing supervisory function or establish a dedicated open finance team. The design of the ecosystem is also critical to oversight and supervision. If there is an implementation entity in place, that entity can handle the more technical aspects of oversight, such as monitoring APIs.

Each approach has advantages and trade-offs, and the most appropriate model will depend on the regulator's mandate, organisational structure, available resources and the maturity and design of the open finance ecosystem.

- **Embedded within existing structures.** The advantages of this approach include building on existing structures, processes and institutional knowledge rather than creating a new function from scratch, which lowers implementation costs. It makes it easier to integrate open finance into broader regulatory and supervisory activities and allows open finance risks to be considered alongside wider developments in the financial sector. The disadvantages are that open finance may not receive dedicated attention within a larger function with competing priorities. Existing structures may become less suitable as the ecosystem grows, especially if open finance requires a specialised focus beyond compliance. In the UK, supervision of open banking participants is undertaken through existing functions within the Financial Conduct Authority (FCA). The FCA's Payments Supervision Department is the primary risk-based supervisor for individual participants (Dias, Mazer & Jeník, 2026, p. 14).

- **Dedicated team.** A dedicated team can develop expertise needed to monitor complex ecosystem data, assess performance, and identify emerging risks and poor participant practices. It is better positioned to assess whether implementation is meeting policy goals, and to coordinate across various regulators to ensure compliance with standards and rules. Creating a dedicated team requires having the resources and budget for skilled personnel and tools. There is also the risk that the dedicated team operates in a silo, which can lead to coordination failures and duplicating of efforts. In Brazil, the Central Bank of Brazil has a dedicated oversight team, operating within its prudential supervision department. The team is responsible for offsite monitoring and thematic reviews, and closely coordinates with the industry implementation body, Open Finance Brasil (Dias, Mazer & Jeník, 2026, p. 14).

Key questions to consider:

- Do existing legal powers enable effective supervision across all relevant open finance participants, or are legislative or regulatory changes required?
- How will open finance fit into the existing regulatory and supervisory structure of the organisation?
- What are the key relationships and dependencies between organisational functions and teams, and how will these be coordinated?
- Does the organisation have the capacity, expertise and resources needed to supervise open finance effectively?
- What, if any, is the role of an implementation entity?

Supervisory posture and objectives

Supervisory posture in this paper refers to how a supervisor approaches open finance supervision, including its objectives for supervision of open finance, the desired and feasible level of intrusiveness and intensity, and the desired balance between proactive and reactive supervision.

Supervisors will adopt different postures depending on the overall supervisory philosophy of the institution, the objectives of the regime, the resourcing of the supervisor and the size and maturity of the ecosystem. A reactive posture that focuses on identifying and responding to non-compliance after it has occurs through complaints, incident reports, investigations and enforcement actions may be appropriate where the primary objective is to ensure compliance with regulatory requirements. However, because it is inherently backward-looking, it is not well-suited to identifying emerging risks nor preventing consumer harm and anti-competitive practices.

Where supervisors seek to identify and mitigate risks before they materialise, a proactive supervisory posture is required. This involves ongoing monitoring of the ecosystem, using supervisory data and other intelligence to identify emerging risks and undertake targeted interventions before they cause harm or escalate into ecosystem-wide issues affecting large numbers of consumers. Particularly given the potential for operational failures in open finance ecosystems, a proactive supervisory posture may be valuable where the supervisory objectives extend beyond compliance to include objectives such as promoting consumer trust, competition, safeguarding data sharing or supporting the resilience of the ecosystem.

While a proactive approach may necessitate the use of supervisory data, this does not necessarily mean sophisticated or expensive tools. Supervisory technology and regulatory technology can be used to support supervision of open finance, but they are not a prerequisite for implementation. For example, relatively simple technology solutions can facilitate incident and complaint submission, record-keeping, and basic analysis (Di Castri, Grasser, & Barasa, 2025). However, as oversight becomes more active, ecosystems expand and data collection becomes more frequent, granular, and complex, supervisory authorities are likely to require some level of technology to automate data collection, validation, storage and analysis. More advanced solutions, such as machine learning and artificial intelligence, may support risk-based supervision of open finance, through automated monitoring dashboards, alerts and predictive analytics, that identify emerging risks and help to prioritise interventions (World Bank, 2025).

In the early stages, the way supervisors respond to problems matters as much as how they monitor for them. Dias, Mazer & Jeník (2026) argue that supervisors should prioritise prompt corrective action over pursuing formal enforcement as a default response to open finance issues. In the early stages of implementation, performance issues are common and addressing them quickly is often more important than imposing fines or similar responses. Formal enforcement action also typically has long lead times. Delayed correction can undermine ecosystem performance, erode customer trust and weaken adoption. Supervisors can and should pursue formal enforcement for egregious breaches, but they should also require financial service providers to correct problems promptly rather than wait for enforcement proceedings to conclude.

A corrective supervisory approach does not, however, remove the need for credible enforcement. Rather, corrective action and enforcement should be viewed as complementary elements of a graduated supervisory response. The approach should be underpinned by a clear mandate, with a range of corrective and enforcement powers that apply across all open finance participants. Participants must also have the confidence that supervisory concerns will escalate to formal enforcement where corrective action fails or serious breaches occur.

African regulators may need to establish enforcement credibility in open finance early through a small number of visible actions on clear breaches and frequent direct engagement.

Key questions to consider:

- What is the organisation's supervisory posture and objectives for open finance, and will that enable effective open finance?
- What needs to change to adopt effective proactive supervision that supports open finance objectives?

Interdependent considerations

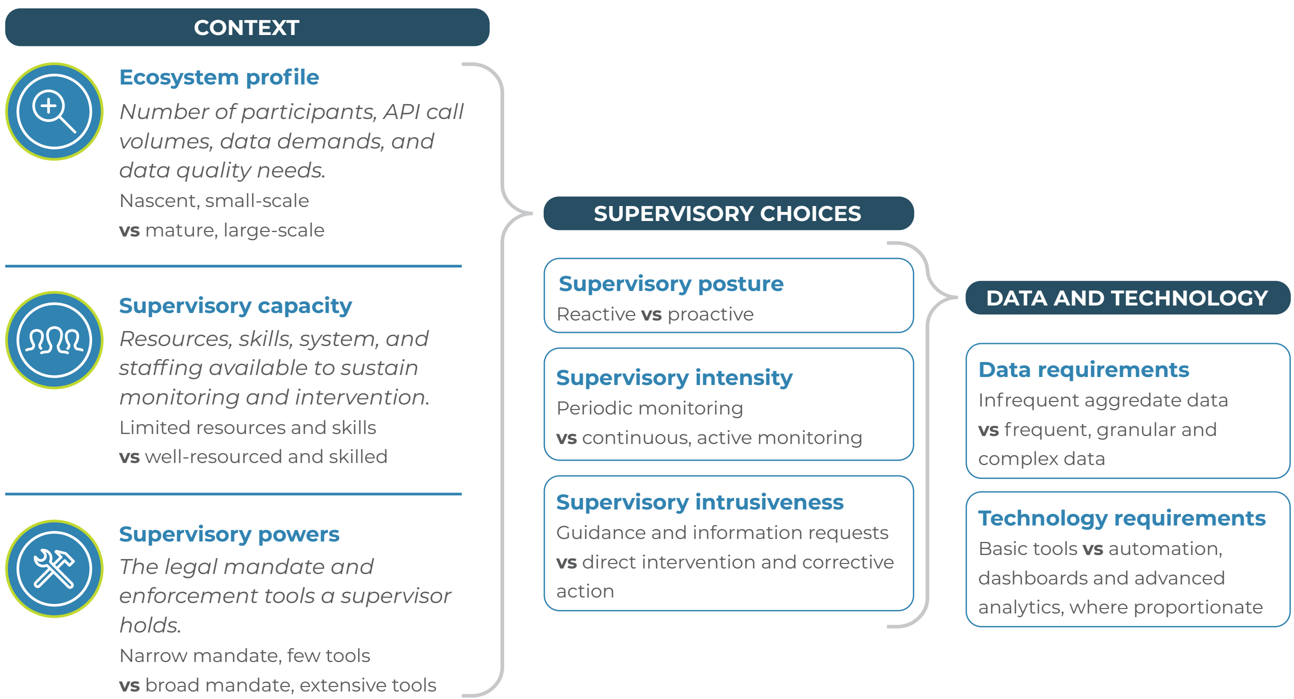
There is no precise calibration of supervisory approach that is the right fit for all open finance implementations. Open finance supervision will be shaped by the choices made by supervisors, the existing context as discussed above, as well as the size and complexity of the ecosystem being supervised – which will likely increase over time. These considerations are interdependent and should be considered together when developing a supervisory strategy.

For example, a proactive supervisory posture, which supervisors will typically need to move towards if open finance is to meet its policy goals, generally requires more frequent and granular information than a reactive approach, allowing supervisors to identify and address risks before they result in consumer harm or ecosystem disruption. As ecosystems expand in size and complexity, this may create a greater need for automation, supervisory technology and specialised analytical capacity.

However, supervisory ambitions need to be calibrated against available powers, resources and expertise. Where capacity is constrained, supervisors may need to adopt a more targeted approach, focusing on the highest-priority risks and participants while gradually expanding supervisory intensity over time. The approach can also vary across areas of supervision, for example supervisors may take a proactive, but less intrusive approach to operational oversight and a reactive and intrusive approach to certain conduct issues.

Figure 1 below illustrates these considerations as a set of spectrums. On the left, context reflects the starting conditions a supervisor operates within: the scale and complexity of the ecosystem, the capacity and skills available, and the powers and mandate a supervisor holds. On the right, supervisory choices reflect the deliberate decisions a regulator makes about posture, intensity and intrusiveness, which together shape data and technology requirements.

Figure 1: A spectrum of interdependent supervisory considerations



3 How should supervision evolve as open finance ecosystems mature?

Throughout open finance implementation, the three areas of supervision discussed in the previous chapter - operational oversight, conduct supervision and policy outcomes and market development monitoring - remain relevant. However, the relative emphasis placed on each changes as the ecosystem develops. To illustrate how these supervisory priorities evolve, this chapter uses the four implementation phases introduced by Cenfri (2024). While these phases are not intended to prescribe a fixed implementation pathway, they provide a practical way of illustrating how supervisory priorities evolve as open finance ecosystems mature. The intention of this phased approach is to support supervisors in anticipating their current and future needs and develop informed supervisory strategies. For the purposes of this paper, each phase is summarised by the characteristics of the ecosystem at that stage, providing context for the supervisory guidance that follows:

- **Phase 0: Building the foundations.** Open finance has not yet been implemented, but the enabling environment is being established. Governance arrangements, legal and regulatory frameworks, technical standards, and consumer protection mechanisms are being developed to support future data sharing.
- **Phase 1: Pilot implementation.** Open finance is operational on a limited basis, with a small number of participating providers and use cases. Operational arrangements, consumer journeys and governance mechanisms are being tested and refined before broader implementation.
- **Phase 2: Scaling implementation.** Open finance participation is expanding, use cases beyond the original priority use cases are being developed, and the ecosystem is becoming more operationally mature.
- **Phase 3: Ecosystem expansion.** Open finance extends beyond the initial participants and use cases to include a broader range of financial sectors and providers.

The following sections outline the supervisory priorities associated with each implementation phase. Each phase begins by identifying the key supervisory risk and the potential consequences if that risk is not addressed, before outlining the priority areas for supervision and posing questions to help regulators assess whether the necessary supervisory arrangements are in place. Across the implementation phases, different areas of supervision become more prominent, with supervision expanding in both scope and depth across operational, conduct, and policy elements as data collection and supervisory capacity gradually increase. Given the importance of considering supervision at the early stages, the questions to consider are necessarily more numerous in the early phases.

Phase 0: Building the foundations

Key risk: Leadership is passive, with no clear authority or industry buy-in.

Potential consequences: Large providers stall implementation, governance arrangements remain fragmented or dominated by large players and supervisors lack the authority and sector cooperation needed to move the ecosystem into the pilot phase.

In this phase, the focus of supervision is on understanding the implications of design choices for supervision and oversight (See Dias, Mazer and Jeník, 2026), ensuring that there are no gaps that will later affect oversight and supervision, and developing the skills and tools that will be necessary for open finance supervision.

In addition, licensing regimes, if needed, will be developed for third party providers, such as Account Information Service Providers (AISPs) and Payment Initiation Service Provider (PISPs)[2], and implementation entities if they are in place. Regulators need to ensure that the full range of supervisory and enforcement tools is available across all potential ecosystem participants.

2 AISP and PISP are the terms used in Europe and elsewhere for open banking based services that use data only (AISP), such as a budgeting app or that initiate payments (PISP), such as an ecommerce payment provider. (European Union, 2015)

Supervisory priorities

In this phase, open finance is not yet operational, so the focus is on preparing for operational oversight. Supervisory capacity needs at the design stage are relatively low, as supervisors need only to provide inputs into design, rather than any active oversight or supervision.

Priorities include:

- Ensuring supervisors have sufficient powers to effectively oversee the system (including data collection, corrective action and enforcement)
- Ensuring licensing and/or accreditation requirements reduce the likelihood of conduct issues, and enable supervisors to address them if they arise
- Determining baselines for policy outcomes measurement

Data collection

Supervisors face several linked choices about how much data to collect and from whom. On type, relying only on incident reports and complaints is the least intrusive option, but it depends on participants reporting accurately and does not support proactive intervention, so it is more suited to environments where high compliance can be assumed.

On granularity, raw data preserves analytical flexibility but shifts the processing burden to the supervisor, while aggregated indicators are easier to review but limit what can be seen, shifting that burden to the provider instead. On frequency, periodic reporting is enough where the goal is to catch problems after the fact (for example, complaints data), while near-real-time reporting suits issues needing early intervention (for example, API failures), though it requires automation, standardisation and investment from both sides. On scope, standardised reporting from all participants supports ecosystem-wide comparison and dashboards but raises compliance costs; a calibrated approach applying more detailed or frequent reporting only to higher-risk or larger participants reduces the burden on smaller players such as AISPs, who are often lower-risk or are already covered by existing prudential/conduct oversight (Dias, Mazer & Jeník, 2026, p. 22).

During the pilot phase, it may be desirable to collect more granular data than planned for in the later phases. This can increase the likelihood of identifying and addressing shortcomings early on, while also building a strong evidence base to scale successes. As open finance scales, data collection can potentially transition to a more proportionate, risk-based model focused on key supervisory indicators. This may reduce unnecessary reporting burdens and costs for participants, but needs to be weighed against supervisory priorities and posture.

Design considerations

Oversight and supervision should not be the primary driver of design choices, but should be considered at the design stage as design is what informs the regulatory perimeter, who supervises the eco-system, what tools and powers are available, and what data can be collected and how. The following questions can guide thinking on oversight and supervision during the design:

Key questions to consider:

Governance and implementation

- Is the regime directly implemented, by a regulator or similar, or through an implementation entity?
- Who leads and how is coordination structured?
  - What coordination is needed with external agencies (e.g. data protection regulators, other financial sector supervisors, communications regulators) and with industry, particularly to define operational aspects like whether elements are centralised in an implementation entity or the supervisory authority itself?
- What is the regulatory instrument (such as the legislation, regulation or directive) used for implementation?

Participation and licensing

- Who is allowed and required to participate, and under what licensing and accreditation regime?
- Who is responsible for licensing TPPs, and what are the licensing requirements?
- Who is responsible for licensing any implementation entity, and what are the licensing requirements?
- Do licensing requirements sufficiently address conduct elements, including cybersecurity, competition, data protection, disclosure, complaints handling?
- Are participants required to hold sufficient operating capital or insurance to address problems if they arise?
- Is there sufficient supervisory capacity to handle licensing applications?

Technical connectivity, standards and pricing

- How do the participants technically connect to one another?
  - Do the technical connection requirements enable oversight? For example, if bilateral arrangements are permitted in addition to standardised APIs , how is oversight maintained given that each arrangement may vary in structure and format?
- Are the standards and structures designed to integrate regionally or otherwise internationally?
- Are the consent guidelines sufficient to ensure meaningful, informed and revocable consent?
- How is pricing governed?

Supervisory powers and data needs

- Do supervisors have sufficient powers over all participants to obtain the information and data necessary for supervision? For example, are supervisors empowered to require data, to conduct inspections, and access systems including those of new participants?
  - If there is no centralised point of data exchange, what direct arrangements to obtain, process and analyse (including deduplication) data exist?
- What data will give sufficient visibility of the ecosystem to support the chosen supervisory approach?
  - What data should be collected?
    - What indicators need to be monitored, if any?
    - At what level of granularity is data needed?
  - How often should data be collected?
    - Is real or near real time necessary?
    - At what frequency should periodic data be collected?
  - From whom should data be collected?
- Should more data be collected during the pilot than during ongoing implementation?
- What tools need to be in place to support oversight?

Coordination and objectives

- Which other authorities, if any, will be involved in open finance oversight?
  - Who is responsible for overseeing participants that are outside the regulatory perimeter of the lead authority?
  - Is the supervisor empowered to address operational concerns across all participants?
- What are the primary policy objectives being pursued? How will supervisors know whether they are being achieved?
- What baseline data exists now for understanding policy outcomes, what needs to be collected, and how will it be collected?
- What interim indicators will show that open finance is moving in the right direction?

Phase 1: Pilot implementation

Key risk: Pilot is not focused and does not include representative participants.

Potential consequences: Regulators are unable to obtain meaningful feedback to refine and fully operationalise the open finance ecosystem. Open finance goes live with systemic problems.

In this phase, a selected number of participants test the live ecosystem with a small number of prioritised use-cases. The pilot phase provides an opportunity for supervisory authorities to test the efficacy of supervisory tools and strategy, including the approach to data collection and analysis. Pilots are generally small and contained, allowing supervisors to engage more directly with participants and investigate incidents and complaints in a way that may not be possible once the ecosystem scales.

Supervisory priorities

The supervisory priorities in the pilot phase are:

- Identifying and addressing operational issues
- Ensuring consumers are not harmed in the course of the pilot
- Ensuring consent practices are effective
- Ensuring guidance and supervision mechanisms are capable of delivering on supervisory priorities when the system goes live
- Ensuring participants are properly admitted or accredited to the ecosystem

Consent practices

Consent is central to data-sharing arrangements because it determines whether providers may access and use customer information. Open finance implementation seeks to operationalise broader consent principles, with mechanisms to ensure genuine and revocable consent. Poorly implemented consent can lead to data being shared without consumers genuine agreement or may undermine their participation. Supervising consent via feature phones is a novel challenge not yet explored in other jurisdictions. Box 1 below discusses supervisory considerations for feature phones.

Box 1: Supervisory considerations for feature phones

In markets where feature phones are an important tool for access and use of digital financial services, supervisors need to consider how consent requirements apply across USSD, SMS, SIM toolkit and/or agent assisted consent journeys. Consent mechanisms designed for app or web-based environments might not translate directly to feature phone channels and supervisors should assess whether participants have adapted consent journeys appropriately to the characteristics of these channels or are following specific guidance for this channel.

Supervisors will need to consider whether these channels provide the consumer with sufficient security, control and transparency. Supervisors may therefore need to consider whether the consent journeys apply channel-specific design principles such as simple language, limited characters, shallow menus, navigation support and security (Arkesal, 2026; CGAP, 2014, p. 5). At the same time, these journeys must provide sufficient information for the consumer to make an informed decision. Consumers must also be able to easily revoke consent in environments that are not conducive to tools used elsewhere, such as visual trust-marks or consent dashboards.

Where agents are enabled to support the consent process, this creates additional conduct risks, including whether consumers understand that they are providing consent, whether agents are appropriately authorised and monitored, and whether controls are in place to prevent inappropriate influence or unauthorised data sharing.

Error resolution

Promptly resolving issues between participants help keep open finance ecosystems operating and maintains participant and consumer trust to engage. Jurisdictions that have implemented open finance often use centralised error resolution mechanisms that enable the timely resolution of operational errors. Implementation entities in Brazil, UK, and the UAE use ticket management systems to categorise issues, such as rejected API calls, low API availability, or poor data quality, by type and severity, assigning priority levels to each case raised by participants, and defining escalation paths that trigger a formal dispute resolution process (Dias, Mazer & Jeník, 2026, p. 8). While formal ticketing systems are effective, a less formal system can also be effective in a smaller ecosystem, provided the priority is on prompt and consistent resolution. Error and error resolution data can also provide valuable supervisory insights, potentially revealing patterns of errors that amount to poor conduct, or poor error resolution practices.

Key questions to consider:

- Are data collection mechanisms working? Is the supervisor receiving the data necessary in the right format, frequency and quality to be analysed and for action to be taken?
- How will the supervisor know if consumers experience poor outcomes during the pilot?
- Are incident and complaint reporting pathways functioning?
- Are consent journeys working across all channels?
- Have there been any adverse consumer outcomes in the pilot? How have they been dealt with?
- What supervisory tools should be tested? How are they working?
- Who is participating, and what is their experience?
- Are compliance costs reasonable, in light of the expected benefits of open finance?
- How will errors be resolved within the system? Is this a role for supervisors, and if not, how will supervisors access error resolution data?

Phase 2: Scale implementation

Key risk: Ecosystem does not function well, participants do not comply with obligations, consumer experience is poor

Potential consequences: Too few participants, participant withdrawal and/or consumer mistrust result in too little data sharing and a system that does not thrive and scale.

In this phase, all major data holders, typically the largest banks and mobile money providers, join the system, with data users participating on a reciprocal basis[3]. The supervisory model, adjusted following the pilot, is rolled out across a broader set of participants and use-cases. The focus at this stage should be on ensuring that the ecosystem is functioning effectively, that participants are complying with their obligations and acting consistently with the objectives of the regime, and that consumers can easily manage consent and share their data.

Supervisory priorities

The supervisory priorities in the scale phase are:

- Prompt correction of operational problems that limit or inhibit data sharing
- Identification and correction of conduct issues, particularly those that undermine trust in the ecosystem, including poor consent and data management practices and discriminatory treatment of participants
- Building evidence for policy outcomes measurement

Conduct issues: Focus areas in the scale implementation phase

Pricing. Pricing directly affects whether consumers receive fair outcomes and whether competition goals are being achieved. Open finance is often justified on the basis that increased data sharing will improve competition, lower costs, and expand access to financial services. However, unfair pricing practices can undermine these objectives. For example, larger data holders may charge excessive fees for API access, while mobile network operators may impose high charges for access to USSD and

3 Reciprocity in open finance refers not to direct exchange of equal data between participants, but a reciprocal level of openness. For example, a small credit fintech may not have transaction data to share, but if it is part of the ecosystem, it must make available the data that it does have.

other feature-phone consent channels. This creates barriers to entry for smaller providers, limiting competition, and potentially excludes consumers from accessing products or services. Providers may also impose hidden or poorly disclosed charges on consumers, reducing transparency and making it difficult to assess the true cost of a product or service.

Complaint resolution, data misuse and data quality. Providers should resolve complaints promptly and fairly, and complaints data also signal broader concerns around data protection and disclosure. Data misuse, closely linked to consent, means providers use data only for the purpose for which consent was obtained. Poor data quality or restricted access is primarily an operational issue but can also signal discriminatory data-sharing practices or a deliberate attempt to disadvantage a competitor.

Identifying anti-competitive behaviour

Participant reported data. Potential anti-competitive behaviour can be identified through rejected or delayed data-sharing requests, which may indicate that participants are restricting or slowing access to data for competitors. API availability and response times can show whether third parties are receiving a lower quality of service than a participant's own products and channels. Complaints relating to access, pricing, or discriminatory treatment can provide direct evidence of barriers that make it harder for competitors to participate in the ecosystem. Together, these indicators help supervisors detect practices that may undermine fair competition.

Competition review. These reviews assess broader market dynamics, including market concentration, market entry and growth, consumer switching, and price and product outcomes. Market concentration and entry indicators help supervisors assess whether a small number of providers dominate the ecosystem or whether new providers are able to enter and grow. Consumer switching indicators show whether consumers can move between providers to access better products, prices, or services, indicating that competition is giving consumers meaningful choice. Price and product outcomes assess whether open finance is delivering tangible benefits through lower costs, improved product terms, greater innovation, and a wider range of products and services.

Key questions to consider:

- Is the supervisor able to identify and correct significant operational issues promptly?
- Which indicators will signal discriminatory access or pricing?
- How will anti-competitive behaviour be detected? What are the mechanisms for addressing this?
- Is sufficient data being collected to enable the measurement of policy outcomes?

Phase 3: Ecosystem expansion

Key risk: Ecosystem growth and performance does not meet expectations.

Potential consequences: Benefits of open finance are not achieved or accrue to a small number of dominant participants and a small number of consumers.

In Phase 3, rollout expands across different types of financial service providers, based on readiness. As participation broadens, the ecosystem matures and supervisory focus shifts from implementation readiness and individual participant conduct toward system-wide outcomes, ecosystem resilience and market development.

Supervisory priorities

- Ensuring all participants are monitored effectively across the broader financial sector, for operational and conduct considerations.
- Measuring whether open finance is delivering on its policy goals.

Measuring policy outcomes

When considering policy outcomes, supervisors are likely to use a combination of existing data, participant reported data and specific periodic evaluation.

- **Existing data.** This includes financial inclusion surveys, supervisory and regulatory data, consumer complaints databases, credit bureau and credit registry data, competition indicators, and consumer research. These sources provide a broad, market-level view of outcomes but make it difficult to isolate the impact of open finance, as many of the indicators are influenced by wider market, regulatory, and economic factors.

- **Participant reported data.** This complements existing data sources by offering direct evidence of ecosystem adoption and usage. Data such as active consents, API calls, participant numbers, product uptake, and customer engagement can help regulators assess whether open finance services are being used and whether the ecosystem is growing. These indicators can also support assessments of broader policy outcomes. For example, the number of new use cases can serve as a proxy for innovation, the number of active users and consents can serve as proxies for consumer empowerment, and uptake among underserved consumer segments can serve as a proxy for financial inclusion. Reporting requirements should focus on filling information gaps that cannot be addressed through existing data sources.
- **Periodic evaluation.** Policy outcomes are typically assessed through periodic evaluations conducted at predetermined intervals, such as annually or biannually. Unlike operational indicators, which can be monitored continuously, many policy outcomes take time to materialise and should be assessed over longer time horizons. During implementation and the early years of operation, more frequent evaluations are needed to assess operational performance indicators. As the ecosystem matures, evaluations shift to longer-term trends and outcomes.

Measuring inclusion is a particularly important consideration for African regulators, Box 2 below discusses one way of measuring inclusion.

Key questions to consider:

- Are the indicators demonstrating that open finance is meeting objectives, or should alternatives be considered?
- Is the supervisor sufficiently resourced (human and technology) to oversee the current ecosystem size?
- Are coordination and cooperation arrangements working across the sector?
- Is participation increasing and are new use cases being developed?

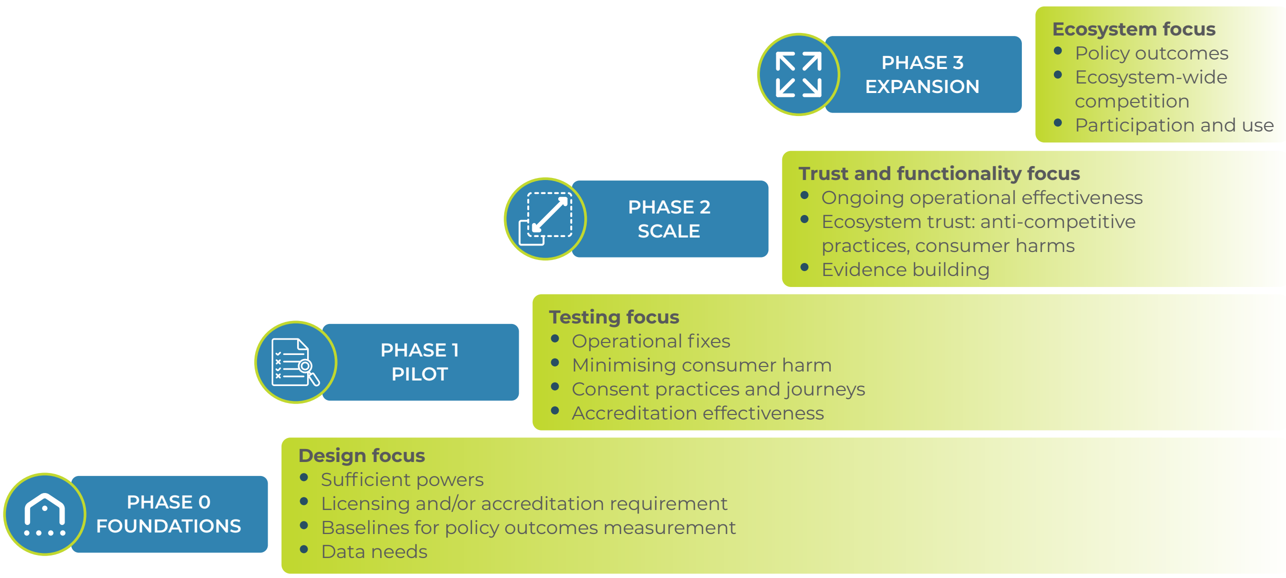
Box 2: Measuring inclusion using use-case data

Open finance can contribute to financial inclusion by enabling providers to use data to better assess risk, develop more tailored products, and serve consumers and small businesses with limited financial histories. Measuring this can involve tracking the maturity and uptake of specific use cases, such as alternative credit scoring for thin-file customers. Monitoring these indicators helps determine whether data sharing is translating into tangible benefits, such as lower interest rates, improved access to credit, or product portability. For example, the Central Bank of Brazil conducts biannual surveys to identify potentially impactful use cases for financial inclusion and competition (Dias, Mazer & Jeník, 2026, p. 19).

A phased approach to oversight and supervision

Open finance supervision is not static, and most regulators will not have a fully mature open finance supervisory framework in place on day one of open finance implementation. Rather, as this section has laid out, open finance supervision changes across implementation phases, with different phases having different areas of focus. As open finance implementation progresses, so too does supervision, with each phase building on the last. In phase 0, supervisory effort is focused on the design of the ecosystem, ensuring that licensing, data access, supervisory powers are in place, that policy baselines are established and data needs are clarified. In phase 1, the pilot phase, the emphasis shifts to operational testing, ensuring that the system works effectively, and that consumer protection elements, especially around consent, are in place as well as making adjustments to the supervisory model. By phase 2, when major data holders and data users are operating an expanded set of use cases, supervision focuses on trust and functionality, expanding the depth and scope of supervision of both operational elements and conduct, including competition considerations. As implementation reaches phase 3, the focus shifts to ecosystem wide considerations including policy outcomes and participation and use of the system, including by participants outside of the regulatory perimeter of the lead supervisor. Figure 2 below illustrates this progression as a series of expanding, stacked layers, moving from phase 0 at the bottom to phase 3 at the top. Each layer sits on top of and extends beyond the one before it, reflecting how supervisory priorities accumulate rather than replace one another: the focus areas established in phase 0 continue to matter in later phases, even as new priorities are layered on top in phases 1 through 3.

Figure 2. Expanding supervisory priorities across the phases of implementation



4 Conclusion

Effective oversight and supervision is only one part of an open finance implementation, but getting it right is critical to whether the ecosystem is safe, functional and sustainable. Open finance introduces new dependencies between participants, as well as new operational and conduct risks. If supervisory needs are considered too late, gaps in powers, data access, reporting arrangements, institutional responsibilities and coordination mechanisms can become difficult to correct once the ecosystem is operating.

There is no single supervision and oversight model for open finance. The appropriate approach will depend on market structure, regulatory design, ecosystem complexity, supervisory posture, supervisory capacity, and implementation phase. Effective supervision will usually centre on three core elements: operational and ecosystem oversight, conduct supervision, and monitoring progress towards policy outcomes.

In the early stages of implementation, supervisors need to ensure that design choices support effective oversight, that baselines are established and that supervisory powers, data access and coordination arrangements are clear. During piloting and scaling, attention shifts toward testing reporting mechanisms, monitoring operational performance, addressing conduct risks and ensuring that consumers can safely consent, share and revoke access to their data. As the ecosystem expands, supervision should increasingly focus on policy outcomes and whether the benefits of open finance are reaching the intended consumers and providers.

For African regulators, the priority is to plan for supervision from the start, shape design choices where they affect supervisory effectiveness, calibrate supervisory tools and capacity to local context and gradually expand the scope and depth of supervisory analyses, data collection and coverage of participants. This requires clear communication with participants and consumers, practical coordination across regulators and authorities, and a proportionate approach to data collection and supervisory intensity. Ultimately, oversight and supervision is not only about ensuring compliance, but supporting the development of an ecosystem that is resilient, inclusive and capable of delivering its intended policy outcomes.

“For African regulators, the priority is to plan for supervision from the start, shape design choices where they affect supervisory effectiveness, calibrate supervisory tools and capacity to local context and gradually expand the scope and depth of supervisory analyses, data collection and coverage of participants.”

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Cape Town, South Africa
info@cenfri.org
cenfri
www.cenfri.org