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Remittance model: a study of developing country in Bangladesh

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Abstract
This study examines and analyses migrant’s remittances model based on secondary sources as well as primary survey conducts on 300 Bangladeshi remittances senders in Malaysia. The survey revealed that formal banks and money transfer operators are still prominent channels/access points for sending remittances. However, it is interesting to note that digital channels, such as electronic money institutions (EMIs), payment service providers and online remittance providers, are beginning to become active. In addition, there are certain channels for sending and receiving remittances that are generally recognized at the global level as being “informal” or “semi-informal”. These include carrying cash either in person, through friends and relatives or through courier companies. Other examples may include businesses that are not licensed to carry out remittance transfers, but offer these as an unregulated side business. Informal fund transfer systems, such as the hawala system, where flows are netted off and transfers are based on established, trusted networks (which are unlicensed and unregistered), are also popular informal remittance systems. Finally, this paper has concluded with some policy recommendations.

Keywords
remittances, migration, socioeconomic impact, poverty, model, multiplier, GDP

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1.1 Introduction

According to the World Bank\textsuperscript{1}, global remittances in 2017\textsuperscript{2} totaled USD 595.7 billion, 75.6 percent of which ($450.1 billion) correspond with remittance flows to low- and middle-income countries. This volume marks an increase of more than 50 percent since 2007\textsuperscript{3}, and cross border remittances now account for more than five percent of GDP for 47 developing countries\textsuperscript{4}.

At the societal level, remittances are associated with lower levels of poverty and represent a large and steady supply of foreign funds. Remittances support demand for local consumption and provide a cushion for the volatile flows of other types of international funds, such as foreign direct investment and aid. At the household level, remittances are associated with increased spending on housing, education and income-generating activities\textsuperscript{5}. Remittances therefore play a vital role in the development of low- and middle-income countries.

There are challenges, however remittances sent through existing formal channels can be prohibitively expensive (Mannan & Farhana, 2015; Mannan & Fredericks, 2015) with costs currently averaging 7.2 percent for a $200 transfer. A large proportion of remittances are still sent through informal channels, which lack consumer protection mechanisms\textsuperscript{6}.

The rise of new communication and information technologies and innovative mechanisms for delivering financial services and products are creating new opportunities for cross-border transfers to get money into the hands and ideally into the accounts of those who need it most. Unfortunately, these technologies may not be covered by existing regulatory frameworks for cross border fund transfers. To address this issue, to identify the main challenges with cross-border remittances and payments and how regulators have addressed these challenges.

1.2 Research Objectives

This paper on innovative cross-border remittances updates has the following objectives:

(i) to define existing cross-border remittance business models, legal and regulatory requirements, and the challenges regulators face in promoting financial inclusion;

(ii) to broaden the scope of the topic from mobile cross-border payments to digital financial services, or innovative cross-border payments, to cover all financial services provided through digital or other innovative platforms;

(iii) to reveal the results of a survey on cross-border remittances between Bangladesh and Malaysia; and

(iv) to share cases studies between the countries that document how innovative cross-border remittance services are being implemented.
2. Literature Review

2.1. Context

According to recent research, remittances contribute to the welfare of 800 million people worldwide\(^7\). Between 2015 and 2030, it is expected that $6.5 trillion in remittances will be sent to low- and middle-income countries\(^8\). In addition to their direct economic impact, remittances also help to limit the number of displaced persons in conflict, war-to-peace transition and crisis areas by enabling those with few income prospects to sustain themselves. Remittances also support forcibly displaced persons (FDPs) while in transit and/or in refugee camps\(^9\).

Remittances are also a tool for achieving several of the Sustainable Development Goals (SDGs) and contribute directly to poverty alleviation and access to food, water, healthcare and housing (i.e. SDG 1, 2, 3, 4 and 6). Remittances are also associated with increased spending on income-generating activities, which improves economic growth and reduces inequalities (SDG 8 and 10)\(^{10}\). Given the impact of remittances on socio-economic development and the high transfer costs, SDG 10c aims to reduce the transaction costs of migrant remittances to less than three percent.

Remittances can also be a path to financial inclusion as they provide formal channels for sending and receiving money, particularly when they are made into transaction accounts. Remittance inflows enable families at the receiving end to save and invest through formal channels. A recent study by IFAD suggests that 75 percent of remittances are used for immediate needs, such as food, shelter and bill payments. The remaining 25 percent, which accounts for approximately $100 billion, is used for education, health, savings, investments and income-generating activities (IFAD, 2017). As both men and women are active senders and receivers of remittances, it is important that gender is taken into account in the remittance services themselves and in the regulation and supervision of those services.

The proliferation of digital technologies is rapidly transforming the remittance landscape. Innovative new technology-based remittance models are challenging incumbent, clunky and costly models. On the one hand, these new models help to reduce transfer costs and time, and improve access at both the sending and receiving ends. On the other hand, these new, untested and fast evolving business models present challenges to customers and regulators alike.

2.2 Types and Channels of Cross-Border Remittances

There are different categories of digital cross-border remittance services and different business models. In 2007, the Committee on Payments and Market Infrastructures (CPMI) of the Bank for International Settlements (BIS) and the World Bank established “General Principles for International Remittance
which guide countries in classifying cross-border remittance services.

2.2.1 Types of Contractual Agreements

(a) Bilateral agreements: Agreement between two entities or national governments in different countries/nations that gives each party rights and obligations regarding the remittance service. The cross-border bilateral agreements would be: (i) between the same entity in different countries; and (ii) between different entities in different countries.

(b) Multilateral agreements: Agreement among three or more parties, agencies or national governments. The cross border multilateral agreement is based on: (i) a link between the national switch of different countries; or (ii) cross-border remittance hubs; and (iii) a “scheme”, i.e. a set of business and operational rules and technical standards to which payment service providers (PSPs) agree to adhere (e.g. SEPA).

2.2.2 Types of Networks

(a) Unilateral services: A unilateral service is a proprietary product provided “internally” by a single remittance service provider (RSP) without involving other entities as capturing or disbursement agents. Examples of unilateral services include those provided by global banks (with branches in many countries) or other banks that have set up branches abroad in areas where migrants from the home country are concentrated (BIS, 2007).

(b) Franchised services: A franchised service is one in which a central provider, without necessarily having any access points of its own, provides a proprietary service. The central provider creates infrastructure to support the service (e.g. messaging and settlement, advertising), but acquires the necessary access points by inviting institutions in both the sending and receiving countries to offer the service or act as franchisees with essentially standardized terms. Examples of franchised services are global money transfer operators and international credit/debit card schemes are or could be adapted for this purpose (BIS, 2007). This is the primary model currently used for money transfer services. Examples include Western Union, MoneyGram, Ria and UAE Exchange.

(c) Negotiated services: In a negotiated service, an RSP negotiates with a limited number of institutions in other countries to create a sufficient network of access points. Examples of negotiated services include bilateral arrangements between banks (one in the sending country and one in the receiving country), credit union schemes, most transfer services or schemes established by postal organizations (BIS, 2007). These services are more commonly used by focused corridor operators. Examples include the La Poste (France) service to Algeria and the
DBS (Singapore) service to Philippines.

(d) Open services: In an open service, a remittance service provider offers a proprietary service to its customers in the sending country and acquires access points in the receiving country using an open network to which any RSP can have direct or indirect access. Examples include the international banking network, which consists of national payment systems that can be accessed from another country either through correspondent banking or (less commonly) through direct links between national payment systems (BIS, 2007). This model is not typically used in cross-border remittances currently due to the complex mix of technology and security standards required to make it successful.

2.2.3 Main Disbursement Methods

(a) IMTOs offering an online or mobile-based service (b) Electronic money institution (EMI), including mobile money providers (c) Agents of EMIs and mobile money providers (for cash-out), including: Microfinance institutions; Bank branches; Post offices; and Other non-bank financial institutions. (d) Branchless banking/agent banking agents (e) ATM/POS: with cards and without cards

2.2.4 Category of Operational Regulatory Approach

(a) Incoming: The receiving of funds from an entity based in a different country. (b) Outgoing: The sending of funds from/to an entity in a different country. (c) Both: The receiving and sending of funds from entities in different countries.

2.3 Emerging Business Models for Cross-Border Remittances

2.3.1 Mobile Money-Based Cross-Border Remittances

This model enables cross-border remittances to be sent through mobile money or e-wallet accounts. The transfer can happen between: Providers owned by the same group holding company; Different providers working in cooperation; or Multiple providers connected through a “hub” operated by a third party. This model is prominent in West Africa, East Africa, Southeast Asia and the Pacific. Mobile money/e-wallet accounts can be used both at the sending and receiving end.

2.3.2 Online/ Internet

This model enables users to transfer money through an online remittance platform. The transfer can be made through the provider’s mobile phone app or website. Senders can use their online banking account, debit card, credit card, etc. to link to the platform to send money. Receivers can get funds in several ways, such as mobile money, bank account deposit, airtime top-up or cash pick-up. For example, WorldRemit processes the majority of transfers to mobile money accounts.15

2.3.3 Peer-To-Peer

Online peer-to-peer platform matches senders in two countries without the need for money to cross
borders. As the cross-border movement of money is low, the cost of remittances is also relatively low. This is a fully online model as no cash is accepted or sent out. Transactions can happen only through a bank account, card or closed loop wallet offered by the provider.

2.3.4 Bitcoin/ Blockchain

This model enables money transfer through bitcoin or blockchain-based technology.

Bitcoin: Funds are sent and received in the respective local currency, but the crossborder transfer of funds happens through bitcoin, a leading digital cryptocurrency.

Blockchain: Platforms such as Ripple and Etherium20 enable cross-border payment services through their own cryptocurrencies (XRP and Ether, respectively) or through their platforms based on blockchain technology. Blockchain provides a decentralized ledger of transactions (blocks) distributed among all members of the network (chain). The ledger is updated every time a transaction takes place, once the members in the network have verified and approved it.

2.4 Legal and Regulatory Framework

There are different approaches to licensing digital cross-border remittances. The three most common are: licensing non-bank digital financial services providers; authorizing a non-bank digital financial services provider to partner with a local bank; and licensing that is restricted to banks.

2.4.1 Licensing Models

(a) Licensing non-bank digital financial services providers directly: international remittances services, either within their existing business operating license or through a separate money remitter license.

(b) Authorizing a non-bank digital financial service provider to partner with a local bank: Banks provide the core international remittance services while non-bank digital financial services providers provide the distribution channel (e.g. Bangladesh, Pakistan). The licensed entity in this case is a bank.

(c) Licenses restricted to banks only: Non-bank digital financial services providers cannot provide international remittance services under existing laws.

2.5 Challenges for Regulators of Digitally Enabled Cross-Border Remittances

The various legal and regulatory approaches and procedures used to implement digitally enabled cross border transactions create the following challenges for regulators: operational requirements; supervision requirements; and legal and regulatory requirements. Describes these three types of challenges in below:

2.5.1 Operational Requirements

(a) Settlement: Because transactions can be paid out to receivers immediately, there is a risk to
customer funds. If the sending or receiving remittance service provider becomes insolvent, the receiver may not receive their money unless the services are pre-funded or guaranteed. Regulators also need to ensure that settlement funds can be “netted off” rather than processed as two gross settlements in the opposite direction.

(b) Liquidity: Regulators must ensure that RSPs are able to manage liquidity to protect cross-border transfers.

(c) Infrastructure for sending and receiving funds: There are different models in place for sending and receiving remittances (through bank branches, remittance service provider offices or agent shops, online transfers via bank accounts or credit cards and mobile phones via e-wallets). Ensuring there is a robust interoperable infrastructure platform for transfers to be sent/received between different service providers using the same payment instrument and, where possible, between different payment instruments, is crucial for operationalizing remittance flows (e.g. national switch, hubs).

2.5.2 Supervision Requirements

(a) AML/CFT\textsuperscript{16}: Regulators must seek to ensure the provider has adequate systems and procedures in place to spot money laundering and terrorist financing activities. As part of AML/CFT regulation, clients of remittance services must also be identified. In some jurisdictions where customers may not possess identity documents or their identity document(s) do not comply with AML/CFT regulations, those individuals may not be excluded unnecessarily. This can affect women disproportionately since they are less likely than men to have identity documents. Regulators should ensure that KYC/ID requirements are proportional to the nature and amount of transaction\textsuperscript{17}.

(b) Anti-fraud measures: Because remittance services span multiple jurisdictions, regulators need to ensure that both senders and receivers can transact in a safe, reliable and secure environment. This could mean requiring identification/verification of the transacting parties or receipt (or proof of record) of transaction that can be queried in the event of fraud or error.

(c) Security of IT systems: Regulators need to ensure IT systems are secure enough to maintain the integrity of the overall remittance system, such as requiring compliance with international safety/ security standards and periodic technology audits.

(d) Cost transparency: Regulators should require that all costs and fees are disclosed to senders and are communicated to customers in plain language so they can make informed decisions about which channel to use to send money.

(e) Consumer protection and safeguarding customer funds: Regulators must ensure that RSPs have sufficient safeguards in place to ensure customer funds are protected, even in the event of insolvency.

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Regulators must also ensure that RSPs have sufficient consumer protection measures in place, including dispute resolution mechanisms and data protection and privacy standards.

(f) Third-party risk: Innovative cross-border business models often involve multiple stakeholders in the transaction (e.g. cloud computing, data services, third-party agents, hubs, card networks and payment initiation services). Regulators must ensure adequate controls and safeguards are in place for all parties involved in the remittance transaction and have clear lines of responsibility.

(g) Foreign exchange and cross-border transfer data collection: Regulators require providers to have systems in place to record transactions to comply with FATF guidelines and international and local regulations. Collecting this data allows supervisors to audit and inspect the transactions and to have oversight of the complete flow of funds.

2.5.3 Legal and Regulatory Requirements

(a) Different legal and regulatory requirements of countries involved in cross-border remittances: The main differences between international and domestic requirements: Transaction limits; KYC/AML requirements for international transfers; Different KYC levels between sending and receiving countries; Consumer protection (disclosure, transparency and dispute resolution); Financial literacy/education (sufficient information provided about the operating model, prices and risks of the remittance channel options); Transparency and disclosure of fees and terms and conditions expressed in simple, easily understood language; Types of entities authorized to operate in digital cross-border remittances; and Exchange control authorization or reporting.

2.6 Challenges for Financial Inclusion

To promote financial inclusion, it is important to implement proportionate financial integrity and financial inclusion measures. One of the recommendations is drawn from the High-Level Principles for Digital Financial Inclusion published by the global Standard-Setting Bodies (SSBs) with the support of The World Bank and the Global Partnership for Financial Inclusion (GPFI). Regulators must also consider the measures prescribed by the CPMI-BIS on “General principles for international remittance services” (BIS, 2007) and “Payments aspects of financial inclusion framework and guiding principles” (BIS, 2016). The main challenges regulators face in promoting financial inclusion are: The market for remittance services should be transparent and have adequate consumer protection; Improvements to payment system infrastructure that have the potential to increase the efficiency of remittance services should be encouraged; Remittance services should be supported by a sound, predictable, nondiscriminatory and
proportionate legal and regulatory framework in relevant jurisdictions; Competitive market conditions, including appropriate access to domestic payment infrastructures, should be fostered in the remittance industry; and Remittance services should be supported by appropriate governance and risk management practices.

In addition to the traditional challenges of achieving financial inclusion, regulators and policymakers also need to work to close the persistent gender gap in financial inclusion. The issue in more detail, outlining some of the challenges women have with remittances and innovative payments and some areas where improvements could be made. The persistent gender gap in access to formal financial services has been a long-time barrier to full financial inclusion. According to Findex data from 2017, despite the progress that has been made in increasing account ownership among women, 980 million women around the world remain unbanked. The global gender gap is seven percent at global level and nine percent in developing countries. Women are also 36 percent less likely to use mobile money than men.

Although research has revealed local differences, generally women represent half of all remittance senders globally and tend to send a higher proportion of their income regularly and consistently, even though they typically earn less than men. In many markets, women are the main receivers of remittances, particularly in rural areas. There is also evidence that some women tend to use informal services rather than formal services in some markets, due to familiarity with informal service providers, ease of use, accessibility and flexibility, as some informal providers deliver remittances to their doorstep. Furthermore, while there are significant issues with formal identification for all receivers, women tend to be disproportionately affected.

3. Methodology

A mixed methodology approach involving both quantitative and qualitative methods of enquiry was adopted in this study. Given limited resources, a representative sample was chosen from a pre-selected community of Bangladeshi migrants in a locality near Kuala Lumpur comprising male unskilled workers who have been resident in the area between 1- 20 years (to enable the gathering of sufficient historical data on remittances etc.) and employed in one industry so as to eliminate any variations caused by inter-industry bias. A survey was conducted using semistructured interviews and focus group discussions conducted in the Bangladeshi language. Prior to the implementation of the questionnaire survey, the questionnaire was tested in a pilot study to improve its validity. After the pilot study, two data collection exercises (interviews and focus group discussions) were conducted to collect the research data. Based on the mixed method approach, the qualitative findings will provide an in-depth explanation for the understanding of the quantitative output of the study.
analysis of the questionnaire survey data was conducted using descriptive and inferential statistics. This paper focus on the unskilled Bangladeshi male migrant’s remittances in Malaysia who have been working in the service sector (hotels, resorts, restaurants, cafés, entertainment outlets, shopping complexes, hypermarkets, hospitals, airports, etc). They usually live near their work places and share accommodation either provided by employers or otherwise. To obtain a representative sample of the population, Krejcie and Morgan (1970) has recommended the select a random sample of 300 individual migrants. For in-depth clarification of these perspectives related to impact, 10 focus group of 5-10 members each was selected based on certain pre-clarified criteria during the period of January-June, 2015. By rule, Malaysian government approves temporary work permit to the foreign unskilled workers aged between 20 – 45 years.

4. Results and discussion

The findings of the survey results can be summarized following Figure 1.1 as a remittance model between the countries and discuss in below.

![Remittances diagram]

**Figure 1.1: Remittances model between Bangladesh and Malaysia**
The use of innovative new technology-based business models is an opportunity for financial services providers to offer cross-border remittances services securely, efficiently and at a low cost, while also helping to reduce financial exclusion around the world. There are many people living without access to formal financial services, yet most have a demand for cross border remittance products and services. To understand the situation, a survey on cross-border remittances was administered to Bangladeshi workers in Malaysia (see the Appendix for details on respondents). It aimed to identify the main business models, regulations, risks and challenges of innovative cross-border remittance between developing to developing countries. The key results of the survey are presented in the following section.

The survey revealed that banks and money transfer operators are still prominent channels/access points for sending remittances. However, it is interesting to note that digital channels, such as electronic money institutions (EMIs), payment service providers and online remittance providers, are beginning to become active.

From a policy/regulatory standpoint, regulators think that cross-border remittances can be facilitated with appropriate measures that: address operational and compliance risks; (ii) ensure consumer protection; and apply harmonized and proportionate KYC. Other measures that would need to be implemented include ensuring AML and CFT controls are in place and exchange control requirements are met (where relevant).

Survey respondents clearly felt that the prevalence of informal channels and the cost of remittances were the most significant regulatory challenges with current cross-border remittance mechanisms. This could be because of a lack of available formal channels or because the channels are inadequate.

The definition of informal remittances can vary based on a country’s regulatory regime, institutional structure and legal system. However, there are certain channels for sending and receiving remittances that are generally recognized at the global level as being “informal” or “semi-informal”. These include carrying cash either in person, through friends and relatives or through courier companies. Other examples may include businesses that are not licensed to carry out remittance transfers, but offer these as an unregulated side business. Informal fund transfer systems, such as the hawala system, where flows are netted off and transfers are based on established, trusted networks (which are unlicensed and unregistered), are also popular informal remittance systems.

Estimates of the prevalence of informal remittances vary widely, from 35 percent to 250 percent of recorded flows. As informal transactions are usually not recorded and relatively small, measuring informality in the remittance market
is a major challenge. The prevalence of informal remittances depends on several factors, including the high transaction costs of formal channels, lack of financial infrastructure, lack of formal remittance services (particularly where non-bank services are restricted), limited financial inclusion and exchange controls. In particular for Bangladeshi migrants those with uneven migration, documentation requirements make informal channels the only option for sending remittances across borders.

The average cost of sending remittances is higher and is much higher in many other countries. Estimates suggest that by reducing the cost to three percent by 2030, an SDG target, remittance communities stand to save USD 18 billion annually. The complex reasons for informality in the remittance market makes addressing the issue a serious challenge. However, initial evidence suggests that innovation in cross-border remittance services is helping to move informal flows into the formal sector as financial services become easier to access and transaction costs are lowered.

Estimates of the importance of the informal remittance market vary widely, ranging from 35 percent to 250 percent of recorded flows (IMF 2008). Given that informal transactions are not usually recorded and are relatively small, measuring informality in the remittance market is a substantial challenge. However, in general, central banks and policymakers use two broad approaches.

In a 2005 World Bank study that surveyed 40 central banks, 10 had developed methods to measure the volume of informal remittance flows, largely through targeted surveys of migrants (e.g. at points of entry) or household level surveys (World Bank 2005). Since then, surveys have been carried out in a variety of countries, including in 2014 and 2015 by the Bank of Russia.

The World Bank also conducted household surveys in six African countries between 2009 and 2010, which aimed in part to understand the estimated value of remittances sent through both formal and informal channels. For remittances sent within Africa, it was found that migrant workers generally transfer money through informal channels: 35 percent through friends and family and 16 percent by hand themselves (World Bank 2011).

However, using household data to measure informal remittances has several constraints. The tendency to underreport informal flows, particularly where they may be considered illegal or there are concerns about tax implications, poses a significant challenge to collecting accurate data. The current lack of randomized and representative surveys is also a challenge to scaling up estimates on a regional and global level (World Bank Group and Knomad 2017).

From a business model perspective, mobile money remains a prominent channel for digitally enabled cross-border remittances. The majority of mobile-money providers connect to
global, regional and national remittance service providers such as Western Union and MoneyGram. Mobile money providers also enable cross-border remittances by connecting to money transfer hubs. Some providers also connect directly to mobile money providers in other countries through bilateral or multilateral agreements. This cross-border cooperation can be with different mobile money providers or the same provider.

The survey showed that it is not only a lack of specific national regulations that is a major limitation on enabling digital cross border remittances, but also the different regulatory requirements of sending and receiving countries. Differences in KYC requirements, consumer protection requirements and transaction limits also figured prominently.

This study agreed on the potential benefits of formal digital cross-border remittance channels. The main benefits identified in the survey were lower costs and the increased speed of low-value cross-border payments. Digitally enabled cross-border remittances have the potential to lower remittance costs, increase speed and provide last-mile accessibility to consumers both at the sending and receiving end. A recent study by GSMA indicated that the cost of international remittances through mobile money is on average 50 percent cheaper than those through traditional money transfer operators (MTOs)\textsuperscript{22}.

In terms of plans for cross-border remittances, member countries agreed there is a compelling need to implement digital cross-border regulations. Harmonizing regulations at regional and international levels through agreements and MoUs is also part of regulators’ plans. For countries that already have or allow inward digital remittances, they plan to authorize outgoing remittances through digital channels.

5. Conclusion and Recommendations

This paper concluded with some recommendations such as, where possible, license or authorize nontraditional remittance providers to provide cross-border remittance services, both inbound and outbound; ensure a sound, predictable legal and regulatory framework that is well understood; create a proportionate regulatory and legal framework; ensure a non-discriminatory legal and regulatory framework; and regulators and policymakers should encourage improvements in payments and financial sector infrastructure, such as communication standards, payment message formats and electronic fund transfer systems.

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Endnotes


2 According to the BIS and The World Bank (2007), remittance transfers are defined as “cross-border person-to-person payments of relatively low value” and, according to Garcia, J. (2006), a cross-border payment is “a transaction that involves individuals, corporations, settlement institutions, central banks or a combination thereof, in at least two different countries”. The GSMA (2017) has defined mobile-enabled crossborder remittances as “low-value person-to-person (P2P) international transfers, delivered electronically to a financial account held on a mobile phone”. https://www.bis.org/cpmi/publ/d76.pdf http://www.cemlaremesas.org/mediacion/PDF/seminariomx2006/JoseGarcia01.pdf

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7 It is estimated that 200 million senders send money home to family, or around 800 million people.

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