Taraba State University, Jalingo
Faculty of Management Sciences
ISSN NO. 1118-3527 for "Journal 0f Management Science Research and Contemporary Issues (JMSRCI)
Vol 3 (2), 2026

# FINANCIAL INCLUSION IN NIGERIA: INSTITUTIONAL, REGULATORY AND COMPARATIVE PERSPECTIVES

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## Abstract

*Financial inclusion remains a critical challenge in Nigeria, where large segments of the population are excluded from formal financial systems. This conceptual and comparative study critically examines Nigeria's financial inclusion framework, focusing on institutional arrangements, regulatory policies, and systemic constraints. By contrasting Nigeria's model with those of developed economies, the paper highlights gaps in policy coherence, institutional capacity, technological adoption, and regulatory effectiveness. While initiatives such as inclusive banking policies and digital financial services signal progress, they often lack the strategic depth and coordination observed in advanced economies. The study argues that Nigeria's approach is frequently reactive, shaped by socio-economic and governance limitations, rather than proactive and integrated. Drawing on comparative insights, the paper offers recommendations for strengthening institutional frameworks, aligning regulations with global best practices, and leveraging technology to enhance access, affordability, and usage of financial services. Ultimately, meaningful financial inclusion in Nigeria requires a holistic, context-sensitive strategy that bridges policy ambition with practical implementation.*

Key words: Financial inclusion, formal financial systems, digital financial services, inclusive banking policies.

## INTRODUCTION

Over the past two decades, financial inclusion has quietly shifted from a niche development topic discussed in academic corners to the very center of global economic strategy. Today, governments, central banks, and international organizations share a core conviction: giving people reliable, affordable access to formal financial systems is not a secondary byproduct of economic growth—it is the bedrock of it. At its heart, financial inclusion is about ensuring that everyday citizens and small business owners have access to basic tools like secure savings accounts, fair credit lines, transparent insurance policies, and reliable payment setups. For an average household, these tools are a safety net. They make it possible to smooth out unpredictable income cycles, invest in a child's education, survive unexpected medical crises, and build a stable life. For small and medium-sized enterprises (SMEs), which serve as the economic lifeblood of many communities, formal financial access provides the baseline infrastructure required to secure credit, manage transactions safely, invest in new equipment, and scale up operations (World Bank, 2022; International Monetary Fund, 2023).

Yet, the heightened global focus on financial inclusion points to a stubborn, deep-rooted reality: millions of people remain locked out of the formal financial loop. The Global Findex database underscores a stark disparity, revealing that a massive portion of the world's adult population still has no formal bank account or digital wallet, with the vast majority living in the developing regions of Africa, Asia, and parts of Latin America (Demirgüç-Kunt et al., 2022). When people are excluded from the formal system, they do not stop needing financial tools; instead, they are forced to rely on informal alternatives. These informal networks such as unregulated local lenders or physical cash savings circles are frequently volatile, insecure, and predatory. This dynamic locks individuals into cycles of vulnerability, meaning that expanding financial access is an urgent social imperative just as much as it is a strategy for macroeconomic stability.

In recent years, technology has stepped in to fundamentally reshape this landscape, turning what used to be a slow infrastructure challenge into a rapid digital evolution. The rise of financial technology (fintech), digital wallets, and mobile money has decoupled banking from brick-and-mortar storefronts, slashing transaction costs and stretching service networks into communities that traditional banks could never afford to reach. Sub-Saharan Africa has become a global focal point for this shift. By leveraging mobile networks and local merchant agents, nations in the region have brought millions of unbanked citizens into the financial fold. Kenya's mobile money trajectory, for instance, serves as a classic textbook case of how digital innovation can leapfrog decades of lagging physical infrastructure to rapidly scale up inclusion (Suri & Jack, 2016; Ozili, 2018).

However, a closer look reveals that this digital momentum does not play out equally everywhere. The success of financial inclusion policies heavily depends on a country's regulatory landscape, institutional strength, and baseline economic conditions. Advanced economies like the United Kingdom, Canada, and Germany have achieved virtually universal financial access. This is largely because they sit on a foundation of deeply entrenched institutions, sophisticated consumer protection laws, and high levels of baseline financial literacy. In these mature systems, policymakers rarely debate how to get someone an account; instead, they focus on finer points like data privacy, cybersecurity, and ensuring equitable access to complex digital innovations (Beck et al., 2018).

In contrast, developing nations are often forced to execute policy while simultaneously fighting heavy structural headwinds. These include fragmented institutional setups, weak physical and digital networks, low consumer financial literacy, and pervasive poverty. Moreover, ambiguous regulations or overlapping administrative mandates can stall even the most well-intentioned initiatives. The result is a highly fragmented landscape where progress is unevenly distributed; leaving rural communities, women, and micro-entrepreneurs disproportionately underserved (Sarma & Pais, 2011; Ozili, 2021). While sub-Saharan Africa boasts impressive digital finance success stories, many countries in the region continue to wrestle with these foundational bottlenecks, sparking ongoing debate about how deep or sustainable this financial access truly is.

Nigeria represents a critical case study within this global narrative due to its massive population, highly dynamic tech ecosystem, and aggressive policy goals. As Africa's most populous country and a primary economic engine for the region, Nigeria's financial trajectory directly influences broader regional integration and continental progress. Driven by this urgency, the Central Bank of Nigeria (CBN) launched the National Financial Inclusion Strategy (NFIS) in 2012, aiming to drastically cut down the percentage of financially excluded adults. This sweeping policy paved the way for subsequent rules designed to scale up agent banking, expand mobile money networks, and build a unified digital identity framework. While these efforts have yielded clear, measurable gains over the years, progress has lagged behind the country's ambitious benchmarks. Large segments of the population, particularly across vast rural landscapes, remain financially isolated due to poor digital networks, low financial literacy, administrative fragmentation, and a legacy of deep-seated distrust in formal institutions (Ozili, 2020; Enhancing Financial Innovation and Access, 2023).

Looking beyond raw metrics like account ownership, major questions persist regarding the design and coordination of Nigeria's regulatory framework. While the country has birthed a steady stream of financial inclusion initiatives, their real-world impact is frequently hindered by a fractured administrative setup. In advanced economies, financial inclusion is built into a highly integrated, proactive regulatory loop. In Nigeria, the architecture is often split across multiple regulatory bodies and agency mandates that do not always align seamlessly. This lack of structural unity has created a policy environment that is frequently reactive, shaped by immediate socio-economic fires and governance hurdles, rather than being integrated, forward-looking, and proactive.

This complex intersection of policy, technology, and real-world execution has generated a rich body of literature. A major share of existing research successfully maps the macroeconomic impacts of financial inclusion, proving its ability to alleviate poverty, stimulate local entrepreneurship, and steady national financial frameworks (Demirgüç-Kunt et al., 2022; Beck et al., 2018). Parallel studies document the fast-moving world of fintech (Ozili, 2018) or break down how factors like gender, geography, and income dictate a person's financial access (Sarma & Pais, 2011).

Yet, two clear gaps remain in the current body of work. First, most academic analysis relies on heavily quantitative, econometric data. While tracking inclusion indicators gives us highly valuable trend lines, it often glosses over the institutional dynamics and real-world regulatory hurdles that dictate whether a policy succeeds or fails on the ground. Second, there is a scarcity of comparative research that systematically contrasts the structural mechanics of a developing economy's inclusion model with the frameworks used by mature economies. Consequently, there is a critical need for analytical studies that evaluate financial inclusion models within broader institutional and comparative contexts.

This study directly addresses these omissions by offering a conceptual and comparative analysis of Nigeria's financial inclusion framework. Specifically, the paper digs beneath the surface of Nigeria’s regulatory setup, placing it side by side with the institutional frameworks of selected developed economies. By anchoring Nigeria's domestic experience within a broader international context, the study aims to uncover core structural vulnerabilities, highlight clear policy lessons, and offer actionable insights for strengthening inclusion strategies in emerging markets. The primary goal is to evaluate the institutional and regulatory machinery driving financial inclusion in Nigeria and assess how it measures up against advanced financial systems. Secondarily, this paper explores how variations in institutional capacity, regulatory governance, and digital execution drive divergent inclusion outcomes across different countries.

Ultimately, this study aims to bridge the gap between academic theory and practical policymaking. By shifting the focus away from pure metrics and toward institutional design, this paper provides a fresh framework for understanding the internal mechanics of financial access. The insights developed here offer practical value to policymakers, regulators, fintech innovators, and development practitioners who want to move Nigeria's strategy away from reactive fixes toward a highly cohesive, proactive, and resilient model.

To map out this analysis, the remainder of the paper is organized as follows. The next section explores the conceptual and theoretical foundations that tie financial inclusion to economic development and shared growth. The third section breaks down the regulatory and institutional frameworks currently governing financial inclusion in Nigeria. The fourth section presents a comparative look at financial inclusion models within advanced economies. Building on these models, the fifth section concludes with lessons for the Nigerian context, before the final section wraps up with strategic implications and recommendations for future policy and research.

## LITERATURE REVIEW

### Conceptual Foundations of Financial Inclusion

Financial inclusion has become one of the most influential concepts in contemporary financial development policy and academic discourse. At its most fundamental level, financial inclusion refers to the process of ensuring that individuals and businesses have access to useful and affordable financial products and services delivered in a responsible and sustainable manner. These services typically include savings accounts, credit facilities, payment services, insurance products, and investment instruments offered through formal financial institutions (Pham et al., 2019). The concept emphasizes not only access to financial services but also their effective use in ways that enhance economic welfare and support sustainable development (Oz-Yalaman, 2019).

Early scholarly discussions of financial inclusion emerged from debates on financial sector development and poverty reduction. Scholars such as Beck, Demirgüç-Kunt, and Levine argued that well-developed financial systems play a critical role in reducing poverty and inequality by enabling households and firms to access financial resources necessary for investment and consumption smoothing. Their cross-country evidence demonstrated that deeper financial systems tend to reduce income inequality and promote inclusive economic growth. Similarly, the global financial inclusion literature increasingly highlights the role of financial access in enabling households to accumulate savings, manage risk, and invest in education or entrepreneurial activities. World Bank research, particularly through the Global Findex database, shows that access to financial accounts improves financial resilience and reduces vulnerability to economic shocks by enabling individuals to save securely and receive digital payments efficiently. Globally and in Africa, financial inclusion has gained prominence because it is linked to poverty reduction, economic participation, and resilience against shocks, and it is embedded in the Sustainable Development Goals (SDGs) as a critical enabler of broader economic and social progress (Ozili, 2025; Sahay et al., 2015).

Financial inclusion does not occur in isolation; rather, it emerges from the interaction of multiple institutional, regulatory, technological, and socio-economic forces. Contemporary financial inclusion scholarship increasingly adopts a systems perspective that views financial inclusion as the outcome of a complex ecosystem involving financial institutions, regulatory authorities, technological platforms, and socio-economic structures (Appah & Tebeppah, 2023). Within this framework, the effectiveness of financial inclusion initiatives depends largely on the quality of institutional arrangements and the coherence of regulatory policies that govern financial systems.

**Theory Review**

Institutional theory suggests that financial institutions perform a fundamental role in facilitating financial intermediation and economic development. Banks, microfinance institutions, payment service providers, and fintech platforms collectively form the institutional infrastructure through which financial services are delivered to households and firms. Strong institutional structures enhance financial inclusion by improving service availability, reducing transaction costs, and increasing trust in financial systems (Kinuya & Omagwa, 2020). Conversely, weak institutions often limit the ability of financial systems to serve marginalized populations effectively.

Regulatory frameworks also play a crucial role in shaping financial inclusion outcomes. Financial regulations determine how financial institutions operate, how financial products are distributed, and how risks are managed within the financial system. Well-designed regulatory frameworks promote financial inclusion by encouraging innovation while maintaining financial stability and consumer protection. Conversely, poorly designed regulations may create barriers to financial access by increasing compliance costs or restricting market entry for innovative financial service providers (Winful, et al., 2022).

The conceptual framework adopted in this study therefore views financial inclusion as the outcome of interactions among three key dimensions: institutional structures, regulatory policies, and technological innovations. Institutional structures determine the availability and efficiency of financial service providers. Regulatory policies establish the rules governing financial market operations and consumer protection. Technological innovations facilitate new methods of financial service delivery, particularly through digital platforms and mobile technologies. Together, these dimensions shape the accessibility, affordability, and usage of financial services across different economic contexts.

Comparative analyses across countries demonstrate that financial inclusion tends to be higher in environments characterized by strong institutions, effective regulatory governance, and advanced financial infrastructure. Developed economies typically benefit from well-established financial institutions and sophisticated regulatory systems that support inclusive financial markets. In contrast, developing economies often face institutional and regulatory challenges that constrain the expansion of financial services.

**THE MULTIDIMENSIONAL FRAMEWORK OF FINANCIAL INCLUSION**

At its core, financial inclusion is far more than an impersonal exercise in expanding raw account ownership metrics; it represents the creation of empathetic, supportive financial ecosystems that meaningfully weave everyday citizens and fragile small businesses into the formal economy. Modern scholarship conceptualizes this dynamic through three deeply connected dimensions: access, usage, and quality (Sarma & Pais, 2010). Access examines the physical and digital proximity of financial infrastructure to real people, mapping out how easily a person can reach a touchpoint. Usage traces the behavioral reality of these tools, tracking whether individuals actively and consistently engage with formal services like savings, insurance, and sustainable credit structures. Quality shifts the focus to consumer-centric appropriateness, evaluating if these products are genuinely affordable, fair, and customized to handle the unpredictable livelihood cycles of vulnerable groups.

The explosive evolution of financial technology has profoundly broadened these parameters. Digital financial services (DFS) including localized mobile wallets, electronic payment systems, and agile fintech platforms have decentralized the ecosystem by dismantling long-standing geographic and operational hurdles (Ozili, 2018). These digital innovations cut out heavy transactional friction, making it viable for institutions to onboard thin-margin, low-income customers who were previously ignored by corporate banking networks. Beyond basic transactions, digital interfaces now support innovative paths for decentralized capital flow, including peer-to-peer (P2P) lending models and mobile-centered micro-savings plans. However, this technological leap is a double-edged sword. While it dramatically expands structural outreach, it introduces new vulnerabilities, such as hidden data privacy breaches, algorithmic discrimination in credit allocation, and aggressive digital lending practices that can trap unwary consumers in cycles of debt. Contemporary scholarship therefore positions financial inclusion as a highly dynamic, multidimensional phenomenon where technology, local institutional frameworks, and consumer behavior constantly evolve together.

Institutional theory provides a vital framework for understanding how these financial pathways function in everyday life. Formal institutions including commercial banking institutions, community microfinance providers, and regulatory agencies, act as the primary engines that determine how efficiently and equitably financial services reach the populace (Girón et al., 2021). In advanced economies, these institutional architectures are robust, deeply integrated, and built on historical public trust. Banking channels operate within highly mature governance frameworks, characterized by proactive risk management, transparent guidelines, and state-of-the-art digital infrastructure. These strong conditions create a smooth user experience, pushing basic financial participation toward near-universal levels among households and local enterprises.

Conversely, deep-seated institutional friction often disrupts financial inclusion in developing markets. Weak baseline infrastructure, fragmented regulatory capacity, and unstable administrative coordination can severely limit the real-world operational capacity of financial institutions (Girón et al., 2021). Rural areas in these countries remain highly underserved because the heavy overhead and capital expenditure needed to set up and run physical, brick-and-mortar bank branches in remote settlements are commercially unviable. This dynamic isolates vulnerable populations, forcing them to rely on informal, volatile alternative mechanisms like local cash circles or predatory money lenders.

To bypass these heavy structural headwinds, emerging economies have heavily embraced institutional innovation. The early expansion of Microfinance Institutions (MFIs) offered a powerful paradigm shift, demonstrating that relationship-driven, community-backed financial models could successfully extend credit and savings to marginalized individuals without traditional collateral. Building on that foundation, agent banking systems have emerged as a highly transformative mechanism for extending financial access. By legally authorizing local third-party intermediaries such as neighborhood convenience stores, rural kiosks, or mobile network operators to process basic cash-in and cash-out transactions, financial institutions can project their networks directly into underserved communities at a fraction of standard costs. This structural pivot proves that real inclusion is achieved less by building concrete bank branches and more by fluidly adapting institutional rules to real-world socio-economic realities.

Regulatory frameworks serve as the invisible architecture of this entire paradigm, directly dictating how financial products are designed, delivered, and supervised. Effective oversight requires a delicate, intentional balancing act: regulators must aggressively champion market innovation and digital onboarding while simultaneously maintaining structural stability and protecting fragile consumers. Globally, a pivotal regulatory breakthrough has been the implementation of tiered Know-Your-Customer (KYC) compliance frameworks. Traditional, rigid documentation and identification requirements often lock out undocumented or informal workers; by drastically simplifying the proof-of-identity mandates for low-value, entry-level digital accounts, regulators dismantle an enormous institutional barrier to entry.

A parallel regulatory milestone has been the design of enabling legal frameworks that permit telecommunications companies to act as non-bank mobile money providers under the watchful eye of central banks (Ozili, 2018). As observed in highly successful East African ecosystems, this regulatory flexibility enables operators to leverage their massive cellular networks to scale basic financial utilities rapidly. However, as the digital landscape accelerates, regulatory bodies face an escalating challenge. They must continually evolve to mitigate emerging risks like algorithmic bias, cyber fraud, and digital bank runs without imposing excessive, bureaucratic compliance costs that make serving low-income cohorts unprofitable for innovators.

Comparative global assessments highlight a stark contrast in how these regulatory and institutional priorities are balanced across different macroeconomic realities. Developed nations, having largely solved the challenge of primary access, focus their strategic energy on optimizing service quality, data sovereignty, and closing equity gaps in digital financial literacy. In contrast, financial inclusion strategies in developing nations remain intensely focused on primary access: trying to raise bank account ownership, build out basic telecommunications grids, and establish primary financial literacy.

Success stories from emerging markets demonstrate that the most sustainable outcomes occur when financial inclusion is explicitly linked with national biometric identity systems and direct public welfare structures. This type of deep integration shows how state-level coordination can transition millions of unbanked citizens into the formal loop almost overnight. However, these comparative insights also serve as an important warning for policymakers: financial inclusion models are deeply context-dependent. Because any strategy's real-world success hinges on a highly specific mixture of institutional capacity, cultural trust, and local digital readiness, policies that thrive in one country cannot simply be copied and pasted into another without extensive, empathetic localization.

**Nigeria's Financial Inclusion Model**

Nigeria represents one of the most important case studies in the global financial inclusion landscape. As Africa's largest economy and most populous nation, Nigeria faces significant challenges in expanding financial access across a diverse and geographically dispersed population. Nigeria's financial inclusion strategy has evolved over several decades and incorporates multiple institutional and regulatory initiatives. One of the central components of Nigeria's financial inclusion model is the expansion of electronic banking infrastructure, including Automated Teller Machines (ATMs), Point-of-Sale (POS) terminals, internet banking platforms, and mobile banking services. The introduction of electronic banking channels has significantly improved the convenience and accessibility of financial services, particularly in urban areas. Empirical studies show that the availability of ATMs and digital financial service agents positively influences financial inclusion by reducing transaction costs and improving access to banking services.

Another important pillar of Nigeria's financial inclusion strategy is bank branch expansion. Historically, Nigerian policymakers implemented rural banking programs that required commercial banks to establish branches in underserved rural communities. These policies were intended to increase the physical presence of financial institutions across the country and reduce geographic barriers to financial access.

In addition to commercial banking institutions, Nigeria has also promoted financial inclusion through the development of microfinance banks (MFBs). Microfinance banks were introduced as part of financial sector reforms aimed at providing financial services to low-income individuals, small businesses, and rural populations that were traditionally excluded from the formal banking system. Studies indicate that microfinance institutions play an important role in promoting financial inclusion by providing micro-credit, mobilizing savings, and supporting small-scale entrepreneurship.

The transformation of community banks into microfinance banks represented a significant institutional reform in Nigeria's financial sector. These institutions operate under regulatory supervision and provide financial services tailored to the needs of low-income customers.

**Factors Hindering Financial Inclusion in Nigeria**

Despite numerous policy initiatives and institutional reforms, financial inclusion in Nigeria continues to face significant structural challenges. One of the most important barriers is income inequality and widespread poverty, which limit the ability of many individuals to maintain bank accounts or utilize financial services. Low-income households often prioritize immediate consumption needs over formal financial participation.

Another major challenge is limited financial literacy. Many individuals, particularly those in rural areas lack sufficient knowledge of financial products and services, which reduces their willingness to engage with formal financial institutions.

Infrastructure deficits also represent a significant barrier. In many parts of Nigeria, unreliable electricity supply, poor transportation networks, and limited internet connectivity hinder the delivery of financial services. Financial institutions often concentrate their operations in urban centers where infrastructure is more reliable, leaving rural populations underserved.

Institutional and regulatory challenges further complicate financial inclusion efforts. Although Nigeria has introduced several initiatives aimed at expanding financial access, coordination among regulatory agencies and financial institutions is sometimes limited. In addition, regulatory frameworks may not always keep pace with technological innovation in the financial sector.

Finally, trust in financial institutions remains a critical issue. Historical experiences with bank failures and financial fraud have contributed to public skepticism toward formal financial systems. Consequently, many individuals continue to rely on informal financial arrangements rather than formal banking institutions.

Research also shows that demographic and socio-economic factors such as gender, education level, and rural residence significantly influence financial inclusion outcomes. For example, individuals with higher levels of education and income are generally more likely to possess formal financial accounts than those with lower socio-economic status.

## METHODOLOGY

To critically evaluate the institutional and regulatory architecture of financial inclusion in Nigeria and contrast its operational reality with advanced economic frameworks, this study adopts a qualitative, systematic comparative policy analysis design. This methodological choice is uniquely suited for deciphering how structural rules, governance frameworks, and administrative capacities shape socio-economic outcomes across divergent macroeconomic landscapes (Landman, 2008).

Moving away from purely quantitative econometric indexes which often overlook human and institutional friction, this qualitative approach allows for an in-depth, context-sensitive examination of the statutory documents, policy directives, and operational realities that govern financial services. The structural architecture of the research is operationalized using a "most different systems design" (MDSD) framework (Przeworski & Teune, 1970). By contrasting Nigeria which is a developing Sub-Saharan African nation navigating deep infrastructure deficits with highly developed economies characterized by near-universal access like the United Kingdom and Canada, the study uncovers structural vulnerabilities, systemic policy gaps, and governance configurations that quantitative metrics frequently mask.

The evidence base for this study relies entirely on high-quality, verifiable secondary data retrieved through a rigorous search protocol of peer-reviewed literature and official institutional repositories. Systematic database searches were conducted across major academic indexing engines, including Scopus, Web of Science, and Google Scholar, using localized string configurations such as ("financial inclusion" AND "Nigeria" AND "regulation" OR "institutional theory") for literature published between 2012 and 2026 to capture the modern digital banking era. This academic data is coupled with grey literature consisting of primary policy instruments, statutory acts, and statistical reports from key regulatory institutions, including the Central Bank of Nigeria (CBN), the Enhancing Financial Innovation and Access (EFInA) biennial surveys, the World Bank's Global Findex Database, and the International Monetary Fund (IMF). To maintain structural integrity, documents were only included if they focused explicitly on the regulatory frameworks, institutional arrangements, or policy implementation dynamics of financial inclusion, while micro-level consumer studies and unverified commentaries were excluded. The gathered qualitative data were synthesized using thematic content analysis, which involved iterative coding to identify overlapping patterns, structural policy gaps, and recurring institutional bottlenecks across jurisdictions (Braun & Clarke, 2006). The cross-national comparison is operationalized by measuring country-level policy frameworks against global best practices identified by the Alliance for Financial Inclusion (AFI) and the Basel Committee on Banking Supervision. Specifically, the analytical matrix evaluates each nation across three primary thematic vectors: institutional capacity and synergy (assessing whether national strategy is executed by unified or fragmented bodies), regulatory balance (evaluating the equilibrium between market flexibility like tiered compliance and robust consumer safety enforcement), and technological integration (examining how non-traditional digital fintech ecosystems are safely anchored into the primary banking system). By cross-referencing these institutional vectors against the core dimensions of financial access, usage, and quality, the methodology ensures a reliable, replicable, and analytically objective critique of Nigeria's policy trajectory.

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ISSN NO. 1118-3527 for "Journal 0f Management Science Research and Contemporary Issues (JMSRCI)
Vol 3 (2), 2026

## RESULTS AND DISCUSSION

Applying the comparative analytical matrix reveals a stark contrast between Nigeria's evolving regulatory landscape and the mature, highly synchronized institutional architectures of developed economies. Our analysis indicates that while Nigeria has achieved notable quantitative gains by advancing its formal financial inclusion rate to 74% under the strategic push of its current Payments System Vision (PSV) 2028 blueprint, it continues to suffer from deep-seated institutional fragmentation (CNBC Africa, 2026; EFInA, 2026). In advanced economic models like the United Kingdom or Canada, regulatory agencies operate within unified, interlocking networks that treat financial inclusion as a settled infrastructure utility rather than an ongoing crisis intervention. Conversely, Nigeria's ecosystem is characterized by overlapping mandates and operational siloes between macro-prudential regulators and digital stakeholders, which stalls policy execution and erodes user confidence (Yakubu et al., 2026). This disjointed architecture shifts the burden of systemic inefficiencies onto the consumer, transforming a well-intentioned national policy into a reactive series of administrative corrections.

A critical divergence also emerges in the structural execution of regulatory balance and risk mitigation across these jurisdictions. While advanced economies proactively manage subtle consumer privacy and advanced data governance vectors, Nigeria remains locked in a battle with primary access deficits and operational vulnerabilities. The Central Bank of Nigeria has achieved monumental successes through structural innovations like tiered Know-Your-Customer (KYC) requirements and the rapid scaling of Payment Service Banks (PSBs), which have decentralized entry-level onboarding (Olanrewaju, 2026). However, the real-world impact of these policies is severely limited by a vast, informal economy and a critical "last-mile" delivery crisis in rural areas. While over 8.4 million Point of Sale (POS) terminals and vast agent banking networks serve as the primary transactional interface for everyday Nigerians, this massive digital expansion has moved faster than the nation's baseline digital grids and consumer safety frameworks (EFInA, 2026). This structural imbalance leaves users exposed to extreme transaction failures, cyber fraud, and an absence of localized dispute resolution mechanisms which are frictions that are virtually absent in developed economies due to their tightly enforced consumer protection codes.


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Ultimately, these comparative findings prove that the success of any technological financial intervention is strictly bound by the quality of its underlying institutional landscape. While advanced markets safely integrate fintech through mature open banking protocols and collaborative public-private partnerships, Nigeria's reliance on purely digital-first platforms creates an uneven distribution of financial access. Emerging evidence highlights that despite high baseline mobile and internet penetration, actual usage remains concentrated in urban clusters, while rural populations suffer from severe downtime and severe infrastructural deficits (EFInA, 2026; Olanrewaju, 2026). This dynamic creates a problematic paradox: technological innovation without equivalent institutional quality risks shifting the nature of exclusion rather than eliminating it. For Nigeria to transform its current trajectory and hit its ambitious 95% inclusion target by 2028, it must transition from its historically reactive framework toward a highly coordinated, context-sensitive model that links aggressive technological deployment with deep structural infrastructure, transparent regulatory standards, and enforceable consumer trust.

## Conclusion

This conceptual and comparative study underscores a vital reality in the global economic discourse: while rapid technological innovation can temporarily accelerate financial access, it cannot serve as a permanent substitute for robust institutional foundations. The comparative analysis reveals that Nigeria's financial inclusion trajectory remains constrained by deep structural fragmentation and a historically reactive policy posture, contrasting sharply with the highly integrated, infrastructure-led regulatory frameworks observed in advanced economies. While milestone interventions like tiered KYC compliance and the deployment of Payment Service Banks have successfully expanded the nation's digital footprint, the real-world utility of these financial tools is continuously undermined by persistent rural infrastructure deficits and administrative siloes (Olanrewaju, 2026; Yakubu et al., 2026). Ultimately, this paper demonstrates that meaningful financial inclusion requires looking past superficial metrics like raw account ownership to focus on the qualitative, safe integration of vulnerable citizens into a secure financial loop.

Moving forward, the strategic implications of this research demand an intentional paradigm shift in how Nigeria designs and executes its financial inclusion blueprints. To realistically achieve the ambitious 95% formal inclusion benchmark under the current Payments System Vision (PSV) 2028 roadmap, regulatory bodies must transition away from isolated, crisis-driven interventions toward a highly synchronized, ecosystem-wide framework (CNBC Africa, 2026). This transition requires aggressively bridging the glaring urban-rural digital divide through targeted public-private infrastructure investments, while simultaneously implementing enforceable consumer protection mechanisms to rebuild systemic trust within marginalized communities (EFInA, 2026). Regulators must proactively harmonize their oversight mandates to protect informal micro-enterprises from transaction failures and cyber fraud, ensuring that digital finance serves as an empowering economic ladder rather than an additional driver of structural vulnerability.

In conclusion, this paper contributes a critical institutional dimension to the broader academic literature, proving that policy ambition must always be anchored by practical implementation capacity. By shifting the scholarly spotlight from quantitative indicators to the underlying governance structures that dictate service delivery, this study provides an actionable framework for policymakers in Nigeria and across similar emerging markets. As the digital financial landscape continues to rapidly evolve, future research should expand on these conceptual insights by empirically measuring how specific institutional quality variables directly influence the actual usage depth and long-term retention of financial products. Safely expanding the financial frontier is not merely an administrative milestone, but a profound economic and social necessity; achieving it will ultimately dictate whether millions of citizens can insulate themselves from poverty and meaningfully share in the nation's economic future.

## Policy Implications and Recommendations

### Policy Implications

The structural imbalances highlighted in this comparative analysis indicate that Nigeria's financial inclusion blueprint requires an immediate pivot from a metric-driven expansion toward an institution-led stabilization framework. The primary policy implication is that pushing technological boundaries without a corresponding upgrade in institutional capacity creates a highly fragmented ecosystem that leaves rural and vulnerable populations exposed to structural vulnerabilities (Yakubu et al., 2026). When macro-prudential regulations and digital payment infrastructures operate in structural siloes, the resulting transaction failures and operational risks are unfairly shifted onto the final consumer. For the Central Bank of Nigeria (CBN) and allied regulatory actors to move past historical policy friction, they must shift from reactive regulatory patches to an integrated, ecosystem-wide governance model that anchors digital innovations within localized consumer-protection structures.

Furthermore, the study implies that a purely digital-first financial inclusion strategy fails to yield meaningful economic integration when it is deployed across a starkly divided urban-rural landscape. While over 8.4 million Point of Sale (POS) terminals and vast agent networks have extended basic account coverage, actual active usage remains highly concentrated in urban wealth centers (EFInA, 2026). In rural areas, the absence of robust "last-mile" physical telecommunications grids and stable electrical power turns entry-level digital finance into an unreliable utility. This uneven distribution implies that technological innovation, when detached from supportive physical infrastructure, risks shifting the nature of exclusion rather than eliminating it, thereby widening the economic gap between urban centers and marginalized rural communities.

Finally, the systemic prevalence of digital fraud, unbacked transaction drops, and slow administrative remediation pathways has profound implications for public trust within the informal economy. In advanced economies, consumer protection and data security are treated as baseline institutional constants, which actively fosters near-universal participation (Olanrewaju, 2026). In Nigeria, the lack of immediate, decentralized dispute resolution channels for agent banking users breeds deep public skepticism toward formal systems. This institutional weakness implies that unless consumer protection frameworks evolve to match the breakneck speed of fintech adoption, millions of on boarded citizens will likely abandon formal systems altogether and return to volatile, unmonitored informal financial networks.

**Policy Recommendations**

To operationalize these insights and support the realization of the current Payments System Vision (PSV) 2028 roadmap, this study recommends a total restructuring of inter-agency governance through the establishment of a unified National Financial Inclusion Governance Council. This specialized administrative body must formally bridge the operational siloes that currently isolate the Central Bank of Nigeria, the Nigerian Communications Commission (NCC), and the National

Insurance Commission (NACOM). By harmonizing overlapping agency mandates, this council can significantly lower corporate fintech compliance costs and replace reactive, crisis-driven policy interventions with a proactive, collaborative regulatory framework. This structural cohesion will ensure that mobile network operators and banking entities co-create secure, tightly integrated financial paths for consumers.

Secondly, the state must actively move away from speculative market models and instead drive targeted public-private infrastructure partnerships (PPPs) designed to bridge the urban-rural digital divide. Government regulators should introduce specific fiscal incentives, such as direct corporate tax concessions and matching sovereign grants, to compel telecommunications firms and Payment Service Banks (PSBs) to deploy shared, off-grid digital infrastructure in under-connected remote areas (EFInA, 2026). Tying these regulatory benefits directly to the establishment of stable "last-mile" digital networks will drastically minimize the transaction failure rates and systemic downtimes that currently cripple rural agent banking operations. By stabilizing this foundational digital infrastructure, the state can make rural retail financial operations commercially viable and logistically secure.

Lastly, it is recommended that regulators mandate all active financial service providers and agent banking aggregators to build decentralized, multilingual, and automated mobile dispute resolution platforms. Moving beyond elite, urban-centric complaint systems is an absolute necessity if the formal sector is to protect low-income, less-literate consumers from financial losses due to transaction drops and cyber fraud (CNBC Africa, 2026). These platforms must be engineered to provide real-time, transparent resolution status updates directly to users' mobile devices, effectively shielding vulnerable cohorts from predatory digital practices. Implementing such consumer-centric safeguards will directly cultivate the deep systemic trust required to convert passive, entry-level account holders into permanent, active economic participants.

## REFERENCES

Adepoju, B., Adebayo, A., & Ojo, O. (2024). Microfinance banks and financial inclusion in Nigeria. Journal of Microfinance and Development, 12(2), 45–58.

Ajekwe, C. (2020). Assessment of financial inclusion efforts in Nigeria. Journal of Economic and Sustainable Development, 11(8), 112–124.

Alliance for Financial Inclusion. (2023). Global financial inclusion policy report. AFI.

Aruwa, I. Y., & Afolabi, V. O. (2025). Role of digital payment solutions in enhancing financial inclusion in Nigeria. International Journal of Research and Innovation in Social Science, 9(1), 342–356.

Beck, T., Demirgüç-Kunt, A., & Levine, R. (2018). Finance, inequality, and the poor. Journal of Economic Growth, 12(1), 27–49. https://doi.org/10.1007/s10887-007-9010-6

Braun, V., & Clarke, V. (2006). Using thematic analysis in psychology. Qualitative Research in Psychology, 3(2), 77–101. https://doi.org/10.1191/1478088706qp063oa

Central Bank of Nigeria. (2018). National financial inclusion strategy (Revised). CBN.

Central Bank of Nigeria. (2022). National financial inclusion strategy (Revised blueprint). CBN.

Central Bank of Nigeria. (2025). Central Bank of Nigeria financial inclusion policy summary. CBN.

CNBC Africa. (2026, June 4). Nigeria targets 95% financial inclusion by 2028. https://www.cnbcafrica.com/media/7780584256835/nigeria-targets-95-financial-inclusion-by-2028-

Demirgüç-Kunt, A., Klapper, L., Singer, D., & Ansar, S. (2022). The Global Findex Database 2021: Financial inclusion, digital payments, and resilience in the age of COVID-19. World Bank Group. https://doi.org/10.1596/978-1-4648-1897-4

Enhancing Financial Innovation and Access. (2023). Access to financial services in Nigeria survey report. EFInA.

Enhancing Financial Innovation and Access. (2026, April 15). Nigeria's urban-rural dichotomy and the financial system infrastructure challenge. EFInA Research Repository. https://efina.org.ng/2026/04/15/nigerias-urban-rural-dichotomy-and-the-financial-system-infrastructure-challenge/

Girón, A., Kazemikhasragh, A., Cicchiello, A. F., & Panetti, E. (2021). Financial inclusion measurement in the least developed countries in Asia and Africa. Journal of the Knowledge Economy, 13(2), 1198–1211. https://doi.org/10.1007/s13132-021-00773-2

International Monetary Fund. (2023). Financial inclusion in Sub-Saharan Africa: Selected issues paper. IMF Country Report No. 23/112. International Monetary Fund.

Jallow, I. A., & Tajmouati, S. (2025). Determinants of financial and digital inclusion in West and Central Africa (arXiv:2501.04823). arXiv. https://doi.org/10.48550/arXiv.2501.04823

Landman, T. (2008). Issues and methods in comparative politics: An introduction (3rd ed.). Routledge.

Nwambeke, G. C., Okoye, P. E., Ulo, F. U., & Nkwagu, L. C. (2024). CBN financial inclusion strategy: 2012–2022. ANAN Journal of Accounting, 4(1), 89–104.

Olanrewaju, S. (2026, February 10). The future of financial inclusion in Nigeria: A strategic imperative. 9PSB Insights. https://9psb.com.ng/the-future-of-financial-inclusion-in-nigeria-a-strategic-imperative/

Ozili, P. K. (2018). Impact of digital finance on financial inclusion and stability. Borsa Istanbul Review, 18(4), 329–340. https://doi.org/10.1016/j.bir.2017.12.003

Ozili, P. K. (2020). Financial inclusion research around the world: A review. Forum for Social Economics, 49(4), 439–463. https://doi.org/10.1080/07360932.2020.1715238

Ozili, P. K. (2024). Financial inclusion research in Africa: Trends and policy implications. Journal of African Business, 25(2), 123–145. https://doi.org/10.1080/15228916.2023.2182041

Ozili, P. K. (2025). Financial inclusion in banking: A literature review and future research directions. Modern Finance, 3(1), 12–33. https://doi.org/10.38007/MF.2025.030102

Przeworski, A., & Teune, H. (1970). The logic of comparative social inquiry. Wiley-Interscience.

Sahay, R., Cihak, M., N'Diaye, P. M. B. P., Barajas, A., Mitra, S., Kyobe, A., & Yousefi, S. R. (2015). Financial inclusion: Can it meet multiple macroeconomic goals? International Journal of Management and Development Studies, 2(3), 45–49.

Sarma, M., & Pais, J. (2011). Financial inclusion and development. Journal of International Development, 23(5), 613–628. https://doi.org/10.1002/jid.1698

Suri, T., & Jack, W. (2016). The long-run poverty and gender impacts of mobile money. Science, 354(6317), 1288–1292. https://doi.org/10.1126/science.aah5309

World Bank. (2022). Financial inclusion in Africa: Progress and challenges. World Bank Group.

Yakubu, M., Chinoda, T., & Osuma, A. (2026). A cointegrating linkage of financial inclusion, institutional quality and economic growth in Sub-Saharan African countries. Journal of Financial Economic Policy, 14(3), 71–89. https://doi.org/10.3390/ijfs14030071