

**Legal Analysis of the Role of Financial Intermediaries in Enhancing Credit
Accessibility for the Financially Marginalised Groups in Nigeria**

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**In Partial Fulfilment of the Requirements for the Award of Master of Laws (LLM)
Degree**

Certification

This is to certify that **Ayokunmi Comfort THOMAS** with matriculation number **LCU/PG/003944** carried out this research work titled “**Legal Analysis of the Role of Financial Intermediaries in Enhancing Credit Accessibility for the Financially Marginalised Groups in Nigeria**” in the Department of Law, Faculty of Law, Lead City University, Ibadan, Oyo State, for the award of Master of Laws (LL.M) Degree and that this has not been previously submitted.

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Dedication

This thesis is dedicated to God Almighty.

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“Even though the above-mentioned institutions and persons have assisted in the process of this research work, I alone stand responsible for the errors, if any, found in the work.”

Abstract

Despite the presence of banks and non-bank financial institutions in Nigeria, significant segments of the population such as women, individuals living in rural communities, low-income earners, persons with disabilities and ethnic minorities remain financially marginalised. These marginalised groups encounter substantial barriers in accessing credit resulting from their limited education, low-income, geographic isolation and inadequate access to technology. Although banks and non-bank financial institutions are making efforts to bridge the gap for these financially marginalised groups, challenges persist. This research's aim is to investigate the role of banks and non-bank financial institutions in enhancing access to credit for the financially marginalised groups in Nigeria, identifying barriers to financial inclusion and providing actionable recommendations for improving credit accessibility. This research explores how financial institutions can effectively improve credit accessibility for these vulnerable populations thereby addressing the gaps in financial inclusion within the country. This research employs a doctrinal approach of qualitative methodology, focusing on analysing primary and secondary sources, including legal texts, statutes, regulations and case law related to financial inclusion, credit accessibility and the broader context of economic empowerment for marginalised groups. By examining these materials, the study uncovers the legal frameworks and institutional practices that influence access to financial resources in Nigeria. This research concludes that when the marginalised populations with thin credit files or no credit history are aware of credit initiatives organised by both banks and non-bank financial institutions that credit accessibility and in the long run, usage can be achieved. The research recommended a more inclusive financial landscape for the marginalised groups in Nigeria by embarking on mass public awareness sensitisation as well as the enactment of a Financial Inclusion Act.

Keywords: Banks, Credit accessibility, Financial exclusion, Financial marginalisation, Non-bank financial institutions.

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Credit Reporting Act (2017)

English Consumer Credit Act (2006)

Nigeria Deposit Insurance Corporation Act (NDIC) 2023

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List of Acronyms

Abbreviation	Meaning
A2F	Access to Finance
ABC	African Banking Corporation
AC	Appeal Case
AGM	Annual General Meeting
ATMs	Automatic Teller Machines
BBWA	Bank of British West Africa
BNPL	Buy Now Pay Later
BOFIA	Banks and Other Financial Institutions Act
BOJ	Bank of Japan
BVN	Bank Verification Number
CAMA	Companies and Allied Matters Act
CBN	Central Bank of Nigeria
CFAN	Cooperative Financing Agency of Nigeria
CHR	Court of Human Rights
CLR	Commonwealth Law Reports

CO	Company
CRA	Credit Reporting Act
CRPD	Convention on the Rights of Persons with Disabilities
DFI	Development Finance Institution
DEI	Diversity, Equity and Inclusion
DMBs	Deposit Money Banks
EDC	Entrepreneurship Development Centres
EFCC	Economic and Financial Crimes Commission
EFInA	Enhancing Financial Inclusion Innovation & Access
FIU	Economic and Financial Crimes Commission
FLF	Financial Literacy Framework
GEM	Gender Empowerment Marketing
GSI	Global Standard Instruction
ICCPR	International Covenant on Civil and Political Rights
ICT	Information and Communication Technology
IFINCA	Inclusive Finance Nigeria Conference and Awards
IFC	International Finance Corporation
IMF	International Monetary Fund
KYC	Know Your Customer
LPELR	Law Pavilion Electronic Law Report
LSETF	Lagos State Employment Trust Fund

LTD	Limited
MHSS	Maternal Health Service Support
MFBs	Microfinance Banks
MMO	Mobile Money Operators
MPR	Monetary Policy Rate
MPC	Monetary Policy Committee
MSME	Micro, Small and Medium Enterprise
MSMEDF	Micro, Small and Medium Enterprises Development Fund
NAICOM	National Insurance Commission
NBFIs	Non-Bank Financial Institutions
NCC	Nigerian Communications Commission
NCGC	National Credit Guarantee Corporation
NDIC	Nigeria Deposit Insurance Act
NFIS	National Financial Inclusion Strategy
NGOs	Non-Governmental Organisations
NGO-MFIs	Non-Governmental Organisations-Microfinance Institutions
NIMC	National Identity Management Commission
NIN	National Identity Number
NISRAL	Nigerian Incentive-based Risk Sharing System for Agricultural Lending
NPLs	Non-Performing Loans
NWLR	Nigerian Weekly Law Report

NSCQR	Nigerian Supreme Court Quarterly Reports
OMO	Open Market Operations
P2P	Peer to Peer
PBC	People's Bank of China
PENCOM	National Pension Commission
PFI	Participating Financial Institutions
PMI	Primary Mortgage Institution
POS	Point of Sale
PT	Part
PTDI	Pass-Through Deposit Insurance
PWDs	Persons with Disabilities
SAP	Structural Adjustment Programme
SC	Supreme Court
SDGs	Social Development Goals
SEC	Security and Exchange Commission
SMEs	Small and Medium sized Enterprises
SSN	Social Security Number
STMA	Secured Transactions in Movable Assets
T-KYC	Tiered Know Your Customer
UNCRPD	United Nations Convention on the Rights of Persons with Disabilities
USSD	Unstructured Supplementary Services Data

WPA

World Programme Action Concerning Disabled Person

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