

Harnessing Financial Inclusion for Sustainable Development: Mitigating Modern Slavery Risks Through National Financial Inclusion Strategies

Research Report

Dr Loria-Mae Heywood

About FAST: Finance Against Slavery and Trafficking (FAST) is a multi-stakeholder initiative based at United Nations University Centre for Policy Research (UNU-CPR) that works to mobilize the financial sector against modern slavery and human trafficking. Through its alliance-building approach and grounding its work in evidence-based approaches and rigorous analysis, FAST provides tools and training to financial sector stakeholders to take meaningful, sustained action against modern slavery and human trafficking.

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Introduction

The pledge to ‘leave no one behind’ contained within the 2030 Global Agenda for Sustainable Development is of acute importance today. The institutional strengthening of domestic financial institutions towards greater financial inclusion (target 8.10) and the eradication of modern slavery (target 8.7) are core components of the Sustainable Development Agenda. Unfortunately, the realization of the UN Sustainable Development Goals (SDGs) and the safeguarding of vulnerable populations is threatened by a growing number of issues, including an increase in modern slavery over the last five years, and persistent financial exclusion (i.e. the lack of access to formal financial services); an estimated 1.4 billion adults remain unbanked globally.¹

Modern slavery² is an umbrella term used to include human trafficking, forced labour, slavery, servitude, debt bondage, the worst forms of child labour, and forced marriage. Estimates from the 2023 Global Slavery Index (GSI)³ reveal that almost 50 million persons were in situations of forced labour and forced marriage in 2021 – an increase from the estimated 40.3 million victims in 2016.⁴ Addressing modern slavery⁵ in all its forms requires the concerted efforts of legal reinforcement, regulatory enforcement, and private sector action.

Addressing financial exclusion through multistakeholder action is essential for inclusive economic development and serves as an enabler to reduce poverty. Access to and usage of meaningful financial services can help build individuals’ financial well-being. When experiencing economic shocks such as sudden job loss or unexpected expenses, individuals with access to financial services are able to cope more effectively and are less likely to find themselves in desperate situations that might force them into exploitative conditions, such as accepting low-wage or unsafe employment, or modern slavery.

The highest levels of both financial exclusion⁶ and modern slavery⁷ are in the Global South. However, worker exploitation and forced labour are increasing within global value chains due to the demand and supply dynamics of multinational corporations (usually based in Western countries) and smaller subcontractors/labour market intermediaries, and business models that pursue greater profit margins and the outsourcing of production.⁸

¹ Asli Demirgüç-Kunt, Leora Klapper, Dorothe Singer, and Saniya Ansar. *The Global Findex Database 2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID-19* (Washington, DC: World Bank, 2022), p.33.

² ‘Modern slavery’ is a contested term not defined in international law, and one which has increasingly been used to refer to the exploitation of a victim or a deprivation of their freedom through, *inter alia*, coercion, threats, violence, deception, and/or the abuse of power or position of vulnerability.

³ Walk Free, *The Global Slavery Index 2023* (Minderoo Foundation Limited, 2023). Accessible at: <https://www.walkfree.org/global-slavery-index/>. These estimates were derived from 160 countries and are framed by survivor interviews via nationally representative household surveys across 75 countries and an assessment of vulnerability at the national level.

⁴ ILO and Walk Free. *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage* (Geneva, 2017). Accessible at: https://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms_575479.pdf.

⁵ Owing to its value in capturing such distinct, yet related human rights abuses, the term ‘modern slavery’ will hereafter be used in this report, except in cases where distinction of forms is necessary.

⁶ Asli Demirgüç-Kunt, Leora Klapper, Dorothe Singer, and Saniya Ansar. *The Global Findex Database 2021*.

⁷ International Labour Organization (ILO), Walk Free, and the International Organization for Migration (IOM), *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage* (Geneva, 2022), p. 23. Accessible at: <https://www.walkfree.org/reports/global-estimates-of-modern-slavery-2022/>.

⁸ Genevieve LeBaron, Penelope Kyritsis, Cameron Thibos, and Neil Howard, “Confronting the root causes of forced labour: Outsourcing,” *Open Democracy*, 19 March 2019, <https://www.opendemocracy.net/en/beyond-trafficking-and-slavery/confronting-root-caus-7/>; Genevieve LeBaron, “The Role of Supply Chains in the Global Business of Forced Labour,” *Journal of Supply Chain Management* Vol. 57 Issue 2 (2021): pp. 29–42; Franz Christian Ebert, Francesca Francavilla, and Lorenzo Guarcello, *Tackling forced labour in supply chains: The potential of trade and investment governance* (Geneva: ILO, 2023), pp. 106–107.

Emerging evidence demonstrates that financial exclusion multiplies modern slavery risks for vulnerable populations, including human trafficking for sexual and labour exploitation.⁹ FAST therefore proposes that financial inclusion is a potential protective factor against vulnerability to exploitation.¹⁰ This is a nascent theory of change, however, with limited research. To understand the relevant policy landscape to support such a theory, this paper analyses if and how countries with the highest prevalence of modern slavery currently identify and articulate modern slavery risks in their national financial inclusion strategies (referred to as an NFIS) and outline actions to mitigate them.

In relation to mitigation, the analysis investigates whether such policies target associated groups that have been socially and economically 'left behind'. Global South communities, poor adults, adults with less education, indigenous and racially minoritized communities, rural communities, migrants, displaced persons, and women have been identified through research, in particular by the World Bank's Global Findex, to be most excluded from access to formal financial services.¹¹ There are significant overlaps with figures provided by the International Labour Organization (ILO) and Walk Free, which indicate that a person's age and gender shape their modern slavery experiences,¹² and that displaced persons and migrant workers¹³ are especially at risk.

To uphold the 'leave no one behind' pledge and successfully achieve the SDGs, it is imperative to have targeted strategies that address the root and intersectional causes of these challenges and foster national, regional, and international collaboration on modern slavery and financial exclusion. The objective of this report is to identify NFIS examples that explicitly aim to reduce/prevent modern slavery, and to illuminate opportunities to improve financial inclusion approaches for achieving the 2030 Sustainable Development Agenda.

This research exercise found that none of the 26 countries with the highest prevalence of modern slavery had an NFIS that referred to modern slavery (including human trafficking, forced labour, or debt bondage). Other financial sector policies examined similarly made no reference to modern slavery. Nonetheless, in the analysis, some NFIS were identified as referring to, or giving priority focus to, groups which also constitute those facing high risks to modern slavery, such as refugees and low-income groups. Recommendations are therefore made to help countries expand their financial inclusion, and where relevant, their social protection schemes, to explicitly include and prioritize groups that are vulnerable to modern slavery and financial exclusion.

⁹ FAST, *Unlocking Potential: A Blueprint for Mobilizing Finance Against Slavery and Trafficking* (New York: United Nations University Centre for Policy Research, 2019); FAST and INURED, "Financial Needs and Vulnerability to Modern Slavery and Human Trafficking in Haiti," *UNU-CPR Research Report* (New York: United Nations University, 2023); Leona Vaughn and Simon Zaugg, *Strengthening Financial Inclusion to Protect Against Modern Slavery: Applying Lessons to Bank Forcibly Displaced Persons/Refugees* (New York: United Nations University, 2023); Angharad Smith, Leona Vaughn, Toni Cela, Louis HERN Marcelin, Margaret Ohia-Nowak, Charu Hogg, and Ronny Marty, *Modern Slavery and Financial Exclusion: Exploring Crisis-Related Risks for Men* (New York: United Nations University, 2024).

¹⁰ Loria-Mae Heywood and Leona Vaughn, "A Compilation of Practices: Financial Inclusion to Protect Vulnerable Populations from Modern Slavery," *UNU-CPR Thematic Review* (New York: United Nations University, 2024).

¹¹ Asli Demirgüç-Kunt, Leora Klapper, Dorothe Singer, and Saniya Ansar. *The Global Findex Database 2021*; UN General Assembly, *Contemporary forms of slavery in the informal economy: Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences*, UN Doc A/77/163 (2022).

¹² For example, data indicates that forced labour in construction affects men more than women, but this is reversed with domestic work, and sexual exploitation mainly affects women and children. See: Walk Free, *Stacked Odds: How lifelong inequality shapes women and girls' experience of modern slavery* (Minderoo Foundation, 2020); ILO, Walk Free, and IOM, *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage*; The Freedom Fund, *Gender inequality and modern slavery: How to break the cycle of women and girls' exploitation* (2022); and United Nations Office for Drugs and Crime (UNODC), *Global Report on Trafficking in Persons* (Vienna: UNODC, 2022).

¹³ UN General Assembly, *Contemporary forms of slavery in the informal economy: Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences*, UN Doc A/77/163 (2022); ILO, Walk Free, and IOM, *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage*.

Methodology

The GSI was used to select 26 countries with the highest prevalence of modern slavery (concentration of persons in modern slavery), as well as 26 countries with the highest absolute number of persons in modern slavery. Each group of countries was compared against 26 countries with the highest number of unbanked adults, as captured by the Global Findex Report. Since financial exclusion is a risk multiplier for modern slavery, this comparison was done as a preliminary exercise to establish whether any similarities exist between countries with the highest number of unbanked adults and countries with high levels (prevalence and number) of persons in modern slavery.¹⁴

Desk-based research was then undertaken to see if the 26 high-prevalence countries had NFIS, or equivalent policies. A 'gap analysis'¹⁵ was undertaken on these documents to identify any references to modern slavery (including forced labour, human trafficking, and debt bondage). The World Bank and the Alliance for Financial Inclusion were the primary sources for NFIS and policy documents.¹⁶ Where an NFIS or equivalent policy document existed, it was analysed¹⁷ to see if and how it contained reference to groups identified in research as being most vulnerable to modern slavery and most excluded from access to financial services.¹⁸

¹⁴ See Appendix 1.1 and 1.2 for more details and discussion.

¹⁵ See Appendix 1.3 for details.

¹⁶ AFI, *National Financial Inclusion Strategies: Current State of Practice (2022)* (Kuala Lumpur: AFI, 2022). Accessible at: <https://www.afi-global.org/wp-content/uploads/2022/05/NFIS-Current-State-of-Practice-isbn.pdf>; "AFI Resource Center," *Alliance for Financial Inclusion*, last accessed on 21 March 2024, <https://www.afi-global.org/afi-resource-centre/>; "National Financial Inclusion Strategies Resource Center," *World Bank*, last accessed on 21 March 2024, <https://www.worldbank.org/en/topic/financialinclusion/brief/financial-inclusion-strategies-resource-center>.

¹⁷ This strategy/policy gap analysis was a method to determine the following: gaps that exist between a proposed ideal (i.e. references to modern slavery, financially excluded groups, and groups with acute vulnerabilities to modern slavery), and current realities (i.e. what national financial inclusion strategies/policies currently contain in respect of references to modern slavery, financial exclusion, and vulnerable groups). See Appendix 1.3, Table 4.

¹⁸ See earlier references.

Recommendations

The recommendations outlined below, primarily targeting governments and central banks, are geared towards the comprehensive development and use of NFIS as a tool to support the prevention and mitigation of risks to modern slavery, and the achievement of the SDGs.

GENERAL:

- NFIS should make explicit reference to modern slavery, as well as financial exclusion as a risk factor to modern slavery, to focus energies to achieve SDG target 8.7 by 2030 (2025 for child labour). This should be reflected in national anti-slavery/anti-trafficking strategies.
- Updating or creating an NFIS should be done in consultation with a wide range of stakeholders, including from the public and private sectors, civil society groups, people with lived experience of modern slavery, and regional actors.
- Robust data and diagnostics, including sectoral/thematic diagnostics, demand-side surveys, and supply-side data collection should be established to support the implementation and evaluation of NFIS.¹⁹
- NFIS should include references to actions which can jointly support financial inclusion and reduce vulnerability to modern slavery, including: simplifying Know Your Customer measures,²⁰ such as introducing 'tiered' banking²¹ for vulnerable populations; balancing anti-money laundering (AML) and due diligence measures/safeguards;²² utilizing digital technology for increased financial access for target populations (e.g. women, those

residing in rural areas, migrants/migrant workers, etc.); and considering intersectional vulnerabilities (such as on the basis of race, ethnicity, caste, religion, sex, gender, and disability).

- These NFIS actions should be incorporated into institutional work plans, supported by 'high-level champions' within key institutions to advance their implementation, and attached to a well-resourced and robust monitoring and evaluation system. There should also be active and continuous engagement across stakeholder groups.²³

CENTRAL BANKS:

- Central banks are involved in the financial inclusion policies and strategies of several of the countries featured in this research. Where their mandate permits, they should promote and encourage synthesized actions for achieving national financial inclusion and anti-modern slavery policy agendas. This can be done, for example, via its commitment to periodically disperse public information on simplified customer due diligence, digital finance, and other means and measures that can be used to facilitate access to financial services.
- Central banks should consider, for example, subsidized funding to commercial banks to provide affordable services for vulnerable groups.²⁴
- Central banks can likewise act as a supervisor to ensure that measures are suitably implemented, and that consumer protection measures are created and adhered to.²⁵

¹⁹ World Bank, *Toolkit: Developing and Operationalizing a National Financial Inclusion Strategy* (Washington DC: World Bank, 2018); Alliance for Financial Inclusion (AFI), *Policy Model for National Financial Inclusion Strategy* (Kuala Lumpur: AFI, 2020); World Bank, *Technical Note: Lessons from Implementing a National Financial Inclusion Strategy* (Washington DC: World Bank, 2021).

²⁰ Finance Against Slavery and Trafficking, *Insight Briefing: Lessons from the Survivor Inclusion Initiative (SII) – the UK, US, and Canada* (New York: United Nations University Centre for Policy Research, 2022); "Methods to verify the identity of persons and entities," *Financial Transactions and Reports Analysis Centre of Canada (FINTRAC)*, last accessed 20 March 2023, <https://fintrac-canafe.canada.ca/guidance-directives/client-clientele/Guide11/11-eng#s6>.

²¹ Janina Pescinski and Leona Vaughn, "Developing a Public Private Partnership Approach to Increase Financial Inclusion for Modern Slavery Survivors in Mexico," *UNU-CPR Insight Briefing* (New York: United Nations University, 2024).

²² Financial Action Task Force (FATF), *Anti-money laundering and terrorist financing measures and financial inclusion - With a supplement on customer due diligence* (Paris: FATF, 2017). Accessible at: <https://www.fatf-gafi.org/content/dam/fatf-gafi/images/guidance/Updated-2017-FATF-2013-Guidance.pdf>.

²³ World Bank, *Toolkit: Developing and Operationalizing a National Financial Inclusion Strategy*; World Bank, *Technical Note: Lessons from Implementing a National Financial Inclusion Strategy*.

²⁴ Bruno Tissot and Blaise Gadanez, *Measures of financial inclusion: A central bank perspective*, Marrakech, 14 July 2017.

²⁵ *Ibid.*; World Bank, *The Global State of Financial Inclusion and Consumer Protection* (Washington DC: World Bank, 2023).

PRIORITIZATION OF VULNERABLE GROUPS:

- Drawing on the 'leave no one behind' approach, NFIS should make explicit reference to groups recognized to be the most vulnerable to modern slavery and re-exploitation, particularly if such groups similarly face high rates of financial exclusion. Specific attention should be paid to vulnerabilities linked to climate change, conflict, and the lack of access to resources.
- NFIS development processes should examine and advocate for the gathering of disaggregated data on the recommended basis of income, gender, geography, and age, and on other grounds linked

to systemic drivers of exclusion and discrimination prohibited under national and international law.²⁶

- NFIS should consider how to include a central bank's role in controlling inflation and creating price stability as part of facilitating the provision of affordable services to vulnerable groups.²⁷

KNOWLEDGE SHARING

- National financial inclusion lessons and practice should be shared, assessed, and suitably adapted, especially in relation to the access and usage of financial services by vulnerable groups.

²⁶ United Nations System Chief Executive Board for Coordination, *Leaving No One Behind: Equality and Non-Discrimination at the Heart of Sustainable Development* (United Nations, 2017). Accessible at: https://unsceb.org/sites/default/files/imported_files/CEB%20equality%20framework-A4-web-rev3.pdf; United Nations Sustainable Development Group, *United Nations Sustainable Development Cooperation Framework* (United Nations, 2019). Accessible at: <https://unsdg.un.org/sites/default/files/2022-06/UN%20Cooperation%20Framework%20Internal%20Guidance%20--%201%20June%202022.pdf>.

²⁷ Bruno Tissot and Blaise Gadanez, *Measures of financial inclusion: A central bank perspective*.

Findings: National Financial Inclusion Strategies

Of the 26 countries with the highest prevalence of modern slavery, 16 did not have an NFIS or equivalent national policy. Ten had an NFIS: Turkey, Tajikistan, Afghanistan, Russia, North Macedonia, Belarus, Azerbaijan, Pakistan, Papua New Guinea, and Jordan. However, half of these strategies (five) had lapsed by 2020.

Of the countries without NFIS, two were in the process of formulating such strategies: Armenia and Mauritania. Five countries had national financial sector strategies that were available and accessible (Two of these countries had NFIS, while three did not have such strategies).

None of the 10 NFIS or equivalent policies that were analysed referred to 'modern slavery' or associated terms such as 'survivors,' 'human trafficking,' 'forced labour,' and 'debt bondage.' However, each of the ten countries with an NFIS targeted at least one group of vulnerable persons (though not always using the exact terminology)²⁸ identified by the GSI and the Global Findex Report as being high-risk for modern slavery and financial exclusion: women, children, migrants, poor adults, and adults with less education.²⁹

In relation to the most financially excluded persons globally – women, poor adults, and adults with less education – the majority of the strategies target low-income individuals for financial inclusion, including the NFIS in Papua New Guinea and Pakistan, respectively. However, only Afghanistan specifically targeted persons on the basis of education, in this case financial literacy programmes via radio dramas for those who were deemed 'illiterate.' Afghanistan and Russia were also examples of strategies targeting rural populations.

Most countries had financial inclusion policies or strategies that gave specific attention to women. The actions described varied, including a focus on digital finance technologies and other innovations (Tajikistan); the allocation of a partial credit guarantee fund for small- and medium-sized enterprises owned by women (Afghanistan); and financial literacy (North Macedonia). Such attempts to directly target women in respective countries have the potential to reduce the risk of women to modern slavery in target countries.

Reference to 'youth' (a term that tends to overlap with teenage children) was made in approximately 50 per cent of the country cases, which indicates potential for increased and explicit protection from modern slavery risks for this group. For example, in its NFIS, Türkiye included a focus on financial inclusion for unemployed youth, while Papua New Guinea focused on youth and gender as cross-cutting topics across all priority areas.

In stark contrast, an explicit focus on migrants or migrant workers was missing from all but two of the NFIS (Tajikistan and Afghanistan). In addition, only Jordan's NFIS referred to displaced persons/refugees. These are amongst the most vulnerable groups to modern slavery, and financial exclusion can multiply the exploitation risks these groups face. Significant scope therefore exists for national strategies to explicitly address the financial inclusion needs of vulnerable populations, especially as they relate to localized and sector-specific risks of modern slavery. For example, where modern slavery risks are high in agricultural sectors, targeted work to onboard farming communities, youth, migrant workers, and people of low educational attainment can help build financial resilience and mitigate risks such as wage theft.

²⁸ For example, one of the groups targeted under Türkiye's NFIS is 'youth' – a term which can overlap with (but extend beyond) 'children,' while some references to 'low-income' groups in Papua New Guinea's NFIS can closely align with 'poor adults' in the Global Findex Report.

²⁹ See Appendix 1.3, Table 4.

Conclusions

The countries where modern slavery is most prevalent share one commonality – their national financial inclusion policies and strategies lack any explicit reference to modern slavery, whether in the form of human trafficking, forced labour, or debt bondage. Policies and strategies were found, to varying degrees, to include references to groups identified as vulnerable to financial exclusion and modern slavery. However, they would benefit from a risk-based approach/methodology which identifies not only the financial exclusion risk realities for the country, but also integrates these with modern slavery risks.³⁰

Vulnerable groups can be given access to financial services which can lead to greater opportunities to, *inter alia*, send and receive money securely, gain access to social protection payments, be financially independent, build credit, make investments, and save. Survivors of modern slavery, absent from all analysed NFIS, can be protected against re-victimization through financial access,³¹ and can also overcome barriers to gaining access to any compensation sent to them as a form of remedy.³²

Data shows that the world is not on track for SDG target 8.7. This has dire implications for the safety and well-being of vulnerable populations, and the achievement

of other related SDGs. Based on the Sustainable Development Progress Chart for 2023, there is stagnation or regression in the achievement of target 8.7.³³ Further, the year 2020 reflected an 11 per cent decline in the number of trafficking victims detected – the first occurrence in 20 years, and one which may have been on account of COVID-19 prevention measures which affected anti-trafficking response measures.³⁴

The World Bank Group views financial inclusion as a crucial facilitator in reducing extreme poverty and fostering shared prosperity. The first time that the relationship between modern slavery and financial exclusion was identified was when the Financial Sector Commission was tasked by the UN Secretary General to understand the role of the financial sector in modern slavery in 2019, culminating in the publication of a blueprint for the financial sector.³⁵ Since then, FAST has been conducting research to identify and address the financial inclusion needs of populations vulnerable to exploitation or re-victimization. This research and other literature indicate that the lack of financial inclusion (i.e. access to formal financial services) is a risk multiplier to modern slavery for high vulnerability groups ranging from climate-affected³⁶ and forcibly displaced populations³⁷ to survivors of modern slavery.³⁸ Contributing factors

³⁰ See Appendix 2.1 - FAST Country Risk-Based Approach: Considering Financial Exclusion as a Risk Multiplier for Modern Slavery.

³¹ The Survivor Inclusion Initiative (SII) is a financial access project that was launched by FAST in 2019 in the UK, US, and Canada to remove access barriers to financial services for survivors of modern slavery and facilitate access to basic banking services (such as checking and savings accounts). Under the SII, support for survivors is facilitated through partnerships between financial institutions (including supervisors and regulators) and Survivor Support Organizations (SSOs). Financial institutions have provided 'survivor accounts' through a combined focus on simplified customer due diligence, and adherence to AML and counter-terrorist financing safeguards. Such simplified measures are essential in a context where many survivors have experienced barriers to banking such as due to the lack of official identity documentation and the lack of a permanent address. SSOs have helped to verify survivors' identity, status, and proof of address. As of April 2024, more than 3000 accounts have been opened under the auspices of the SII.

³² Research conducted under FAST's Asset Recovery and Restitution Initiative revealed that when survivors of forced labour and/or human trafficking did not have a bank account or an account from a regulated institution other than a bank, this posed a key challenge to several agencies/entities (e.g. civil society organizations, Ministries of Justice, etc.) in facilitating the delivery of compensation to them. See further details: Andy Shen and Loria-Mae Heywood, "Asset Recovery and Restitution: Leveraging Inter-agency and Multi-stakeholder Cooperation to Facilitate Compensation for Victims and Survivors of Forced Labour and Human Trafficking," *UNU-CPR Research Report* (New York: United Nations University, 2023).

³³ "Sustainable Development Goals: Progress Chart 2023," *United Nations*, last accessed on 16 April 2024, <https://unstats.un.org/sdgs/report/2023/progress-chart/Progress-Chart-2023.pdf>.

³⁴ United Nations. *The Sustainable Development Goals Report: Special Edition* (2023), p. 145. Accessible at: <https://unstats.un.org/sdgs/report/2023/The-Sustainable-Development-Goals-Report-2023.pdf>.

³⁵ FAST, *Unlocking Potential: A Blueprint for Mobilizing Finance Against Slavery and Trafficking* (United Nations University Centre for Policy Research: New York, September 2019).

³⁶ FAST, *Earth Shattering: Opportunities for Financial sector Engagement at the Nexus of Modern Slavery and Natural Resources in Ghana* eds. Gifty Ampomah, Sarah Jane Danchie, Leona Vaughn, and Stephen Yeboah (New York/Accra: United Nations University, 2022).

³⁷ Angharad Smith, Leona Vaughn, Toni Cela, Louis Herns Marcelin, Margaret Ohia-Nowak, Charu Hogg, and Ronny Marty, *Modern Slavery and Financial Exclusion: Exploring Crisis-Related Risks for Men* (New York: United Nations University, 2024).

³⁸ FAST, *Insight Briefing: Lessons from the Survivor Inclusion Initiative (SII) – the UK, US, and Canada*; Leona Vaughn, "Lessons from Canada's Approach to Extending Financial Access to Survivors of Modern Slavery," *UNU-CPR Insight Briefing* (New York: United Nations University, 2023).

to financial exclusion for these vulnerable groups, in addition to poverty, gender, race, literacy levels, and other factors, include the lack of identification documents and other supporting documentation, as well as legal and regulatory challenges.

Financial access, however, if not accompanied by products tailored to vulnerable populations' needs and context³⁹ and complementary services like financial literacy/education and consumer safeguarding, may not make a significant impact on reducing vulnerabilities. Providing both access to, and usage of, meaningful and tailored products that respond to the unique needs of individuals can help improve their financial well-being, health, and resilience i.e. the ability to respond

to economic shocks and emergencies. Such provision should also be monitored and evaluated, attached to regulatory and rights-based provisions that ensure the protection of vulnerable populations, adhere to data privacy/consumer principles, and be attached to safeguards against predatory financial provision.

Given the emerging understanding of the inter-relatedness between financial exclusion and modern slavery,⁴⁰ and the widening gap in achieving the SDGs related to modern slavery and financial inclusion goals, targeted financial inclusion activities to address shared vulnerabilities should be understood as an important lever for governments and the financial sector alike to drive progress forward.

³⁹ Katherine Brickell, Laurie Parsons, Nithya Natarajan, and Sopheak Chann, *Blood Bricks: Untold Stories of Modern Slavery and Climate Change from Cambodia* (Egham, UK: Royal Holloway, University of London, 2018).

⁴⁰ Loria-Mae Heywood and Leona Vaughn, "Financial Inclusion to Protect Vulnerable Populations from Modern Slavery: A Compilation of Practices," *UNU-CPR Thematic Review* (New York: United Nations University, 2024).

Appendix

1.1 Research Context and Overview

The 2030 Agenda for Sustainable Development⁴¹ was launched in September 2015 by the UN Sustainable Development Summit in New York and approved by the UN General Assembly. Serving as the culmination of consultations and negotiations from the United Nations Conference on Sustainable Development in Rio Janeiro in 2012, and beyond, the 2030 Agenda envisages “a world of universal respect for human rights and human dignity, the rule of law, justice, equality and non-discrimination.” Building on the Millennium Development Goals, the Agenda details 17 Sustainable Development Goals (SDGs) and 169 targets (a subset of the Goals) which are applicable to, and agreed on, by all 193 UN Member States, and which have a maximum/ designated timeline of 2030 for their achievement. The path that each State takes for the achievement of the SDGs may differ based on the needs that are required to be fulfilled, and involvement in their fulfilment goes beyond government to include the financial sector, the private sector, civil society organizations, trade unions, local authorities, and other groups. The Agenda provides a global framework that can be integrated into national plans, strategies, policies, and budgets. The historic UN General Assembly Resolution 70/1, unanimously adopted on 25 September 2015, and which lays out the 17 SDGs, has itself recognized that “each country has primary responsibility for its own economic and social development and that the role of national policies and development strategies cannot be overemphasized...”⁴²

The global roadmap/plan of action that the Agenda represents is organized around five ‘Ps’ (people, planet, peace, prosperity, and partnerships) and covers a range of varied, yet interrelated/cross-cutting themes and subjects, including climate, gender equality, poverty, sustainable cities and communities, and decent work and economic growth. In this mixture of subjects, reference is made to human trafficking and forced labour and the worst forms of child labour, defined in this report as forms of modern slavery. In this regard, note can be taken of the following SDGs /targets:

- **SDG 5:** Achieve gender equality and empower all women and girls
 - **Target 5.2:** Eliminate all forms of violence against all women and girls in the public and private spheres, including trafficking and sexual and other types of exploitation
- **SDG 8:** Promote sustained, inclusive, and sustainable economic growth, full and productive employment and decent work for all
 - **Target 8.7:** Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking, and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms
- **SDG 16:** Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels
 - **Target 16.2:** End abuse, exploitation, trafficking, and all forms of violence against and torture of children

Of these SDG targets, target 8.7 has the most holistic coverage of modern slavery and its associated elements. Further, the inclusion of human trafficking in the aforementioned targets reflects the indivisible nature of the SDGs and highlights the relevance of the fight against human trafficking to secure goals pertaining to gender equality, decent work, and peaceful and just societies.

Beside the coverage given to modern slavery in respective SDG targets is the coverage given to financial inclusion under SDG 8:

- **Target 8.10:** Strengthen the capacity of domestic financial institutions to encourage and to expand access to banking, insurance, and financial services for all

⁴¹ The Agenda was developed amidst significant development agreements: the Sendai Framework for Disaster Risk Reduction (March, 2015), the Addis Ababa Action Agenda on Financing for Development (July 2015), and the Paris Climate Agreement (December 2015).

⁴² United Nations General Assembly, “Resolution adopted by the General Assembly on 25 September 2015,” United Nations, 21 October 2015, A/RES/70/1.

Situation at Present: Modern slavery and Financial Inclusion

Estimates from the 2023 GSI⁴³ reveal that almost 50 million persons were living in situations of modern slavery in 2021 – an increase from the estimated 40.3 million victims in 2016.⁴⁴ Based on the coverage provided by the 2021 Global Estimates of Modern Slavery, modern slavery has a presence in all regions of the globe, with victims being most prevalent in the Arab States, followed by Europe and Central Asia, Asia and the Pacific, Africa, and the Americas. The quantification of victims by prevalence (per thousand of the population) serves as a contrast to the quantification of victims by the number of people in modern slavery, with the latter revealing that Asia and the Pacific had the highest number, followed by Africa, Europe and Central Asia, the Americas, and the Arab States.⁴⁵ In all such estimates, the GSI identifies women, children, and migrants as the groups that are both the most vulnerable to modern slavery and disproportionately affected by modern slavery.⁴⁶ Whereas women and girls are disproportionately at risk to forced marriage, men and migrant workers (when compared to non-migrant counterparts) are more at risk to forced labour. Risks to modern slavery are further heightened for marginalized persons and groups facing multiple (intersecting) risks related to, and on the basis of, for example, race, ethnicity, caste, religion, sex, and gender.

Based on the 2021 Global Estimates of Modern Slavery, there were 27.6 million people in forced labour in 2021 – a 10.8 per cent increase from the 24.9 persons in forced labour in 2016.⁴⁷ A top source of illicit profits,⁴⁸ forced labour is notably most acute in the lowest tiers of supply chains where production occurs and where raw materials are extracted.⁴⁹ Forced labour likewise occurs in a wide range of industries and sectors, including

those pertaining to garment manufacturing, fisheries, cocoa, mining, agriculture, and construction. Trafficking in human beings, whether for the purpose of sexual exploitation, forced labour, organ harvesting, or other forms of exploitation, is likewise one of the world's greatest generators of illicit profits. This reality of illicit profit-making is juxtaposed against the glaring gap that exists between the profits and proceeds derived from modern slavery and human trafficking and the compensation (one of the forms of remedy) that is usually forthcoming to victims.⁵⁰

Although both developing and high-income economies have witnessed increases in account ownership over the past decade, the increase in account ownership has been more considerable in developing economies, with an increase from 42 per cent in 2011 to 71 per cent in 2021.⁵¹ Further, there have been increases in mobile money accounts, particularly in sub-Saharan Africa where 33 per cent of adults had a mobile money account in 2021 (the largest share in the world), among the 55 per cent of adults from this region with an account. The increased access to bank accounts – whether digital or otherwise – has contributed to greater opportunities for consumers to send and receive money securely, save, make investments (such as in health and education), and better withstand shocks. Further, such access can ultimately reduce vulnerabilities that may be triggered from not having an account, and the expense and lack of security and reliability that may come from accessing money through informal mechanisms.

Yet, having an account and its associated benefits are not experienced by all. Women, poor adults, and adults with less education (i.e. those with a primary education or less) have tended to be the groups most excluded from access to financial services, although there has been a recognition that developing economies have witnessed

⁴³ Walk Free. *The Global Slavery Index 2023* (Minderoo Foundation Limited, 2023). Accessible at: <https://www.walkfree.org/global-slavery-index/>. These estimates were derived from 160 countries and are framed by survivor interviews via nationally representative household surveys across 75 countries and the assessment of vulnerability at the national level.

⁴⁴ ILO and Walk Free, *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage* (Geneva, 2017). Accessible at: https://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms_575479.pdf.

⁴⁵ ILO, Walk Free, and IOM, *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage*, p. 20.

⁴⁶ Walk Free. *The Global Slavery Index 2023*, p. 3.

⁴⁷ ILO, Walk Free, and IOM, *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage*.

⁴⁸ Based on ILO estimates, \$236 billion in illegal profits is generated each year from forced labour in the private economy. Read more: ILO, *Profits and poverty: The economics of forced labour* (second edition) (Geneva: ILO, 2024).

⁴⁹ Walk Free, *The Global Slavery Index 2023*, p. 146. Accessible at: <https://www.walkfree.org/global-slavery-index/>.

⁵⁰ The Remedy Project, *Putting things right: Remediation of forced labour under the Tariff Act 1930* (2023). Accessible at: <https://static1.squarespace.com/static/5f846df102b20606387c6274/t/644b403dced135fba5c64c2/168265330>; Andy Shen and Loria-Mae Heywood, *Asset Recovery and Restitution: Leveraging Inter-agency and Multi-stakeholder Cooperation to Facilitate Compensation for Victims and Survivors of Forced Labour and Human Trafficking* (New York: United Nations University, 2023). Accessible at: https://collections.unu.edu/eserv/UNU:9308/asset_recovery_and_restitution.pdf.

⁵¹ Asli Demirgüç-Kunt, Leora Klapper, Dorothe Singer, and Sania Ansar, *The Global Findex Database 2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID-19* (Washington, DC: World Bank, 2022).

a decline in gender gaps in account ownership.⁵² Further, primary challenges in having an account, as cited by some of the world's 1.4 billion unbanked adults, have included a lack of money, distance to the nearest financial institution, and not having sufficient documentation; the lack of a mobile phone has been a challenge in accessing a mobile money account, as cited by 35 per cent of unbanked adults in sub-Saharan Africa.⁵³ Increased and inclusive access to mobile phones, mobile money accounts, and trusted identification systems *can contribute* to closing access gaps, while also enabling individuals to store, save, transfer, and receive funds across short and long distances in a cost-effective manner.⁵⁴ Greater financial independence, lower poverty rates, and empowerment are also potential outcomes of account ownership. However, in order to maximize the benefits of such accounts, reduce vulnerability to fraud, and support wider development objectives, (further) efforts need to be expended towards customer-sensitive product design and customer safeguards, while also ensuring that those

who are given access to accounts are likewise exposed to financial literacy and numeracy skills, and systems that support the effective use of such accounts.⁵⁵

1.2 Modern Slavery and Financial Exclusion: Country Comparisons

This section compares 26 countries with the highest prevalence of modern slavery (Table 2) and 26 countries with the highest absolute number of persons in modern slavery (Table 3), respectively, against countries with the highest number of unbanked adults (Table 1). This comparison reveals that six of the countries with the highest prevalence of modern slavery are also countries with the highest unbanked adults (See Table 2 below).⁵⁶ Similarly, four countries with the highest absolute number of persons living in modern slavery are countries with the highest number of unbanked adults (See Table 3 below).

Table 1: Twenty-six countries with the highest number of unbanked adults (2021)

Countries	Adults with an account (%)	Region
South Sudan	6	Africa
Afghanistan	10	Asia and the Pacific
Iraq	19	Arab States
Lebanon	21	Arab States
Pakistan	21	Asia and the Pacific
Nicaragua	26	The Americas
Egypt	27	Africa
Sierra Leone	29	Africa
Guinea	30	Africa
Cambodia	33	Asia and the Pacific
West Bank and Gaza ⁵⁷	34	Arab States

⁵² Ibid: pgs 2, 33.

⁵³ Ibid: pgs 3, 11.

⁵⁴ Ibid: pgs 1-3

⁵⁵ Ibid, pp. 4, 10

⁵⁶ It should be noted that because 'West Bank and Gaza' and 'Lao PDR' were featured in the Global Findex Report and not in the Global Slavery Index, these territories were not subject to comparison among other territories. They are nevertheless featured in Table 1 for reference purposes.

⁵⁷ These territories are not included in comparisons. See footnote 56.

Countries	Adults with an account (%)	Region
Burkina Faso	36	Africa
El Salvador	36	The Americas
Lao PDR ⁵⁸	37	Asia and the Pacific
Tunisia	37	Africa
Honduras	38	The Americas
Tajikistan	39	Europe and Central Asia
Malawi	43	Africa
Albania	44	Europe and Central Asia
Algeria	44	Africa
Mali	44	Africa
Morocco	44	Africa
Uzbekistan	44	Europe and Central Asia
Kyrgyz Republic	45	Europe and Central Asia
Nigeria	45	Africa
Panama	45	The Americas
Republic of Congo	47	Africa
Jordan	47	Arab States

Source of data: Global Findex Report

High prevalence for modern slavery
High absolute number of persons in modern slavery
Both: High prevalence and high absolute number in modern slavery

Table 2: Twenty-six countries with the highest prevalence of modern slavery (2021)

Countries ⁵⁹	Prevalence	Region
North Korea	104.6	Asia and the Pacific
Eritrea	90.3	Africa
Mauritania	32	Africa
Saudi Arabia	21.3	Arab States

⁵⁸ This country is not included in comparisons. See footnote 56.

⁵⁹ Countries in bold do not appear in the entire Global Findex database: North Korea, Eritrea, Mauritania, Kuwait, Turkmenistan, Belarus, Azerbaijan, and Papua New Guinea.

Countries	Prevalence	Region
Türkiye	15.6	Europe and Central Asia
Tajikistan	14	Europe and Central Asia
United Arab Emirates	13.4	Arab States
Afghanistan	13	Asia and the Pacific
Kuwait	13	Arab States
Russia	13	Europe and Central Asia
Ukraine	12.8	Europe and Central Asia
North Macedonia	12.6	Europe and Central Asia
Myanmar	12.1	Asia and the Pacific
Turkmenistan	11.9	Europe and Central Asia
Albania	11.8	Europe and Central Asia
Belarus	11.3	Europe and Central Asia
Kazakhstan	11.1	Europe and Central Asia
Azerbaijan	10.6	Europe and Central Asia
Pakistan	10.6	Asia and the Pacific
Papua New Guinea	10.3	Asia and the Pacific
South Sudan	10.3	Africa
Bosnia and Herzegovina	10.1	Europe and Central Asia
Jordan	10	Arab States
Moldova	9.5	Europe and Central Asia
Venezuela	9.5	Americas
Armenia	8.9	Europe and Central Asia

Source of data: Global Slavery Index.

High number of unbanked adults

Table 3: Twenty-six countries with the highest absolute number of persons in modern slavery (2021)

Countries ⁶⁰	Number	Region
India	11,050,000	Asia and the Pacific
China	5,771,000	Asia and the Pacific
North Korea	2,696,000	Asia and the Pacific
Pakistan	2,349,000	Asia and the Pacific
Russia	1,899,000	Europe and Central Asia
Indonesia	1,833,000	Asia and the Pacific
Nigeria	1,611,000	Africa
Türkiye	1,320,000	Europe and Central Asia
Bangladesh	1,162,000	Asia and the Pacific
United States	1,091,000	The Americas
Brazil	1,053,000	The Americas
Philippines	859,000	Asia and the Pacific
Mexico	850,000	The Americas
Saudi Arabia	740,000	Arab States
Ethiopia	727,000	Africa
Myanmar	657,000	Asia and the Pacific
Iran	597,000	Asia and the Pacific
Ukraine	559,000	Europe and Central Asia
Afghanistan	505,000	Asia and the Pacific
Egypt	442,000	Africa
Democratic Republic of the Congo	407,000	Africa
Thailand	401,000	Asia and the Pacific
Colombia	397,000	The Americas
Viet Nam	396,000	Asia and the Pacific
Eritrea	320,000	Africa
Venezuela	270,000	The Americas

Source of data: Global Slavery Index.

High number of unbanked adults

⁶⁰ Countries in bold do not appear in the entire Global Findex database.

Based exclusively on the results from this *preliminary research exercise*, it can be determined that a weak association exists between countries with the highest prevalence and absolute number of persons in modern slavery, respectively, and countries with the highest number of unbanked adults. This weak association among countries is insightful and could be due to a number of factors and possibilities. Firstly, it demonstrates that country-level realities can be distinguished from realities at a more micro and individual level; while financial exclusion as a risk factor to modern slavery was not easily detectable from the juxtaposition of GSI and Global Findex Data, the positive relationship between these variables can be seen in everyday realities.⁶¹ Relatedly, it further exposes the possibility that factors other than financial exclusion have a greater role/prominence in contributing to modern slavery. Thirdly, it demonstrates that while financial exclusion can be a risk multiplier for modern slavery, it is not necessarily a causative factor. Fourthly, while the GSI is based on data from 160 countries, the Global Findex database analyses data from 123 economies. Eight⁶² of the 26 countries with the highest prevalence of modern slavery do not likewise appear in the entire Global Findex database. This reality therefore narrows the possibilities for establishing links between countries with the highest prevalence of modern slavery and countries with the highest number of unbanked adults. Another related factor that can help explain the aforementioned weak association among the two groups of countries relates to the demographic focus of each study: while the GSI covers both children and adults, the Global Findex Database focuses exclusively on adults which further narrows the possibilities for establishing correlative links.

Within this context, the examination of national financial inclusion policy and strategy documents within each of the countries where modern slavery is most prevalent is a more favourable way to understand and gain insight into the linkages and nature of the relationship between financial inclusion and modern slavery. This approach is perceivably more risk-sensitive since financial inclusion strategies form the basis on which work on financial inclusion is (or is intended to be) implemented; adjustments in these strategies and the implementation of strategies could therefore have an impact on both the financial inclusion and modern slavery landscapes. Further, as can be recalled from the 2030 Agenda for Sustainable Development,

“the role of national policies and development strategies cannot be overemphasized”⁶³ within the context of the SDGs. With the SDGs containing associated targets that are directly related to modern slavery and financial inclusion, and given the integrated and indivisible nature of the SDGs and targets, the transformative power of national financial inclusion policies and strategies in forwarding the sustainable development agenda should not be underestimated.

1.3 Gap Analysis: Modern Slavery, Financial Inclusion, and National Financial Inclusion Strategies

Given the link established in the literature between financial exclusion and increased risks to modern slavery, national financial inclusion documents were sourced⁶⁴ to perform the following tasks:

- Identify any reference to modern slavery (and associated terms);
- Identify whether any reference is made to groups that are (globally) most vulnerable to modern slavery; and
- Identify any reference to groups that are (globally) most excluded from access to financial services.

By targeting and facilitating the financial inclusion of such groups, the (intersectional) risks of such groups to modern slavery can be reduced. It should be noted that when national financial inclusion documents were examined for references to the vulnerable groups mentioned above, checks were also made for the use of alternative words/terms and related words, where relevant. For example: children (boy, girl, minor), migrants (refugees, displaced groups), or poor adults (low-income). Further, where other related words were used in these documents, these words were noted (when detected). Financial sector strategies were also sourced from the World Bank’s website, as well as via the inputting of key words/search terms (e.g. financial inclusion, financial inclusion policies, financial sector strategies, and financial sector development, etc.) in search engines along with respective country names. All documents that were not in English were translated using Google Translate.

⁶¹ Loria-Mae Heywood and Leona Vaughn, “A Compilation of Practices: Financial Inclusion to Protect Vulnerable Populations from Modern Slavery,” *UNU-CPR Thematic Review* (New York: United Nations University, 2024).

⁶² North Korea, Eritrea, Mauritania, Kuwait, Turkmenistan, Belarus, Azerbaijan, and Papua New Guinea

⁶³ United Nations General Assembly, “Resolution adopted by the General Assembly on 25 September 2015” United Nations, 21 October 2015, A/RES/70/1.

⁶⁴ The majority of the financial inclusion policies and strategies referred to/referenced in this document were sourced from AFI and the World Bank.

Table 4: References to modern slavery and vulnerable groups in 26 countries with the highest prevalence of modern slavery

Country	Financial inclusion strategy?	References to modern slavery?			References to vulnerable/excluded groups in projections and intended outputs and outcomes?					Comments
		Human trafficking	Forced labour	Other	Women	Children	Migrants	Poor adults	Adults with less education	
North Korea	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Eritrea	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Mauritania	Formulating ⁶⁵									*National financial sector strategy addressing financial inclusion: Financial Sector Development Strategy and Action Plan (2013-2017). ⁶⁶ [No reference to modern slavery; Priority given to women and the poor].
Saudi Arabia	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	*National financial sector strategies addressing financial inclusion: Vision 2030. ⁶⁷ -Vision 2030 Overview ⁶⁸ [No reference to modern slavery; Includes a focus on women, youth and children. This is not directly focused on financial inclusion]. -Financial Sector Development Programme: Programme Charter 2022. ⁶⁹ [No reference to modern slavery or to any of the vulnerable groups].
Türkiye	Yes	No	No	No	Yes	Youth	No	Consideration of income	No, but there's a focus on financial education for a wide range of groups	Financial Access, Financial Education Financial Consumer Protection Strategy and Action Plans (from 2014). ⁷⁰

⁶⁵ AFI's 'National Financial Strategies: Current State of Practice (2022)' reveals that Mauritania was formulating its NFIS (page 9): <https://www.afi-global.org/publications/national-financial-inclusion-strategies-current-state-of-practice-2022/>. AFI (via a social media post) in 2023 subsequently revealed that the Central Bank of Mauritania was expected to release the country's first NFIS in 2023. The post further indicated that women, youth, small- and medium-sized enterprises, and forcibly displaced persons would be prioritized in this strategy: https://www.linkedin.com/posts/alliance-for-financial-inclusion_arab-financial-inclusion-day-mauritania-activity-7059198700526469122-mDau/?originalSubdomain=pe.

⁶⁶ "Islamic Republic of Mauritania: Financial Sector Development Strategy and Action Plan (2013-2017)": <https://openknowledge.worldbank.org/server/api/core/bitstreams/95c9c5b7-0cc5-5b4e-8046-e59c81fc9d27/content>.

⁶⁷ "Financial Sector Development Program" (Kingdom of Saudi Arabia): <https://www.vision2030.gov.sa/en/vision-2030/vrp/financial-sector-development-program/>.

⁶⁸ "Vision 2030: Kingdom of Saudi Arabia": <https://www.vision2030.gov.sa/media/cofh1nmf/vision-2030-overview.pdf>.

⁶⁹ "Financial Sector Development Program: Program Charter 2022" (Kingdom of Saudi Arabia): <https://www.vision2030.gov.sa/media/24hj2de5/2021-2025-financial-sector-development-program-delivery-plan-en.pdf>.

⁷⁰ "Financial Access, Financial Education Financial Consumer Protection Strategy and Action Plans" (Türkiye): <https://www.tcmb.gov.tr/wps/wcm/connect/8bf47975-30a5-4d2c-9a33-0d4ca4e96167/ActionPlan.pdf?MOD=AJPERES>.

Country	Financial inclusion strategy?	References to modern slavery?			References to vulnerable/excluded groups in projections and intended outputs and outcomes?					Comments
		Human trafficking	Forced labour	Other	Women	Children	Migrants	Poor adults	Adults with less education	
Tajikistan	Yes	No	No	No	Yes	Youth	Yes	Low-income people	No	National Financial Inclusion Strategy of the Republic of Tajikistan for 2022–2026. ⁷¹
United Arab Emirates	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Afghanistan	Yes	No	No	No	Yes	No	Yes	Not directly	Illiterate people	National Financial Inclusion Strategy (2020-2024). ⁷²
Kuwait	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Russia	Yes	No	No	No	No	School-based training	No	Low-income citizens	No	<p>-Priorities of the financial inclusion programme of the Russian Federation for 2022-2024 (Bank of Russia).⁷³</p> <p>-Strategy for increasing financial inclusion in the Russian Federation for the period 2018-2020.⁷⁴</p> <p>*National financial sector strategies addressing financial inclusion:</p> <p>-Russian Financial Market Development Programme for 2022-2024 (Bank of Russia)⁷⁵ [No reference to modern slavery; ‘Low-income groups’ to benefit from special financial goods and services that would help reduce money transfer fees].</p> <p>-Guidelines for the Development and Stability of the Financial Market of the Russian Federation for the Period of 2016–2018 (draft).⁷⁶</p>

⁷¹ “National Financial Inclusion Strategy of the Republic of Tajikistan for 2022–2026”: https://www.afi-global.org/wp-content/uploads/2023/10/NBT_NFIS_strategy_2022_2026-002.pdf.

⁷² “National Financial Inclusion Strategy: 2020–2024 (Afghanistan): <https://www.dab.gov.af/sites/default/files/2020-06/National%20Financial%20Inclusion%20Strategy%20for%20Afghanistanfinal.pdf>.

⁷³ Bank of Russia, “Financial Market Development”: <https://www.cbr.ru/eng/develop/>; Bank of Russia, “Priorities of the financial inclusion programme of the Russian Federation for 2022-2024”: https://www.cbr.ru/Content/Document/File/133266/Prioritet_naprav_FinUslug_2022-2024.pdf.

⁷⁴ “Strategy for increasing financial inclusion in the Russian Federation for the period 2018-2020” (translation) (Russia): https://www.cbr.ru/Content/Document/File/84497/str_30032018.pdf.

⁷⁵ “Russian Financial Market Development Program for 2022-2024”: https://www.cbr.ru/Content/Document/File/132531/fm_development_program_2022-2024.pdf.

⁷⁶ “Guidelines for the Development and Stability of the Financial Market of the Russian Federation for the Period of 2016-2018 (draft)”: https://www.cbr.ru/content/document/file/99422/opr_1618.pdf.

Country	Financial inclusion strategy?	References to modern slavery?			References to vulnerable/excluded groups in projections and intended outputs and outcomes?					Comments
		Human trafficking	Forced labour	Other	Women	Children	Migrants	Poor adults	Adults with less education	
Ukraine	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	*National financial sector strategy addressing financial inclusion: Strategy for the Development of the Financial Sector in Ukraine Until 2025. ⁷⁷ [No reference to modern slavery; Strategy includes reference to financial literacy frameworks for children and youth (2020-2022), and a financial literacy competency framework for adults (2020)].
North Macedonia	Yes	No	No	No	Yes	No	No	Unemployed	Financial education for all age groups	Strategy for Financial Education and Financial Inclusion of the Republic of North Macedonia (2021-2025). ⁷⁸
Myanmar	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Turkmenistan	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Albania	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Belarus	Yes									National Financial Inclusion Strategy (2014-2019). ⁷⁹
Kazakhstan	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Azerbaijan	Yes	No	No	No	No	No	No	Low-income households	No	On the development of financial services in the Republic of Azerbaijan: Strategic Roadmap (2016-2020). ⁸⁰
Pakistan	Yes	No	No	No	Yes	No	No	Low-income persons e.g farmers	Nationwide education services focused on financial education	National Financial Inclusion Strategy: Pakistan (2015-2020). ⁸¹

⁷⁷ "Strategy for the Development of the Financial Sector in Ukraine Until 2025" (translation): https://bank.gov.ua/admin_uploads/article/Strategy_FS_2025.pdf?v=4.

⁷⁸ "Strategy for Financial Education and Financial Inclusion of the Republic of North Macedonia (2021-2025)": https://www.nbrm.mk/content/Strategy_for_Financial_Education_and_Financial_Inclusion_of_the_Republic_of_North_Macedonia_2021-2025.PDF.

⁷⁹ The National Financial Inclusion Strategy of Belarus is not currently accessible.

⁸⁰ "On the development of financial services in the Republic of Azerbaijan: Strategic Roadmap" (translation): https://azertag.az/store/files/Strateji_yol_xeritesi/strateji_yol_xeritesi_maliyye_xidmetlerinin_inkishafi_15122016.pdf.

⁸¹ "National Financial Inclusion Strategy: Pakistan" (2015–2020): <https://www.sbp.org.pk/ACMFD/National-Financial-Inclusion-Strategy-Pakistan.pdf>.

Country	Financial inclusion strategy?	References to modern slavery?			References to vulnerable/excluded groups in projections and intended outputs and outcomes?					Comments
		Human trafficking	Forced labour	Other	Women	Children	Migrants	Poor adults	Adults with less education	
Papua New Guinea	Yes	No	No	No	Yes	Yes (financial education)	No	Low-income	No	National Financial Inclusion Strategy (2016-2020). ⁸² *National financial sector strategy addressing financial inclusion (2018-2030). ⁸³ [No reference to modern slavery; Priorities include financial inclusion for underserved low-income people, 50 per cent of whom will be women].
South Sudan	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Bosnia and Herzegovina	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Jordan	Yes	No	No	No	Yes	Youth	Refugees	Yes	No	The National Financial Inclusion Strategy (2018-2020). ⁸⁴
Moldova	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Venezuela	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Armenia	Formulating									

⁸² "National Financial Inclusion Strategy (2016–2020)": <https://www.thecefi.org/wp-content/uploads/2019/01/2nd-NFIS-CEFI-PNG.pdf>.

⁸³ "Financial Sector Development Strategy (2018–2030)": <https://www.thecefi.org/wp-content/uploads/2019/02/Financial-Sector-Development-Strategy-2018-2030.pdf>.

⁸⁴ "The National Financial Inclusion Strategy (2018-2020)" (Central Bank of Jordan): <https://www.cbj.gov.jo/EchoBusv3.0/SystemAssets/PDFs/2018/The%20National%20Financial%20Inclusion%20Strategy%20A9.pdf>.

2.1 FAST Country Risk-Based Approach: Considering Financial Exclusion as a Risk Multiplier for Modern Slavery

Example of the FAST methodology shared with Financial Intelligence and Anti-Money Laundering specialists (2022–24) for developing acknowledgement of financial exclusion in National Risk Assessments and incorporating risk-based approaches to inclusive finance strategies:

	Unbanked (adult population)	Rural population	Migrant worker Population	Poverty Rate	Refugee Population	People in Modern Slavery
Example Country	33%	45%	34,000	23.8%	3,631 in 2020 7,514 in 2022	86,000 (estimated) – 0.45% of population

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