清华大学国家金融研究院
TSINGHUA UNIVERSITY NATIONAL INSTITUTE OF FINANCIAL RESEARCH

2018 7 38

沙盒监管国际模式及中国借鉴可行性

2016

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Research report

2018- edition

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Regulatory Sandbox and its Feasibility in China

XIN Real Estate Fintech Research Center

Xun Shuo, Wei Xingkong

Abstract

Financial Technology (Fintech) is the engine of future economic growth. Currently, all major economies are stepping up their efforts to improve the fintech regulatory framework and strengthen international coordination. Since 2016, the UK, Singapore, Hong Kong and other countries and regions have promoted innovative fintech regulatory arrangements, including regulatory sandboxes, innovation centers and innovation accelerators. This article makes a comparative analysis on the operation methods of the "supervision sandbox" in the UK, Singapore and Hong Kong in terms of role positioning, testing process, regulatory authorization, supporting facilities and consumer protection. Combining with the characteristics of current situation of fintech industry in China, this article suggests that Chinese regulators should promote business model innovations rather than lower the admittance criterion of financial institutions. The banking industry may try to apply blockchain techniques for pilot exploration while highlighting consumer protection.

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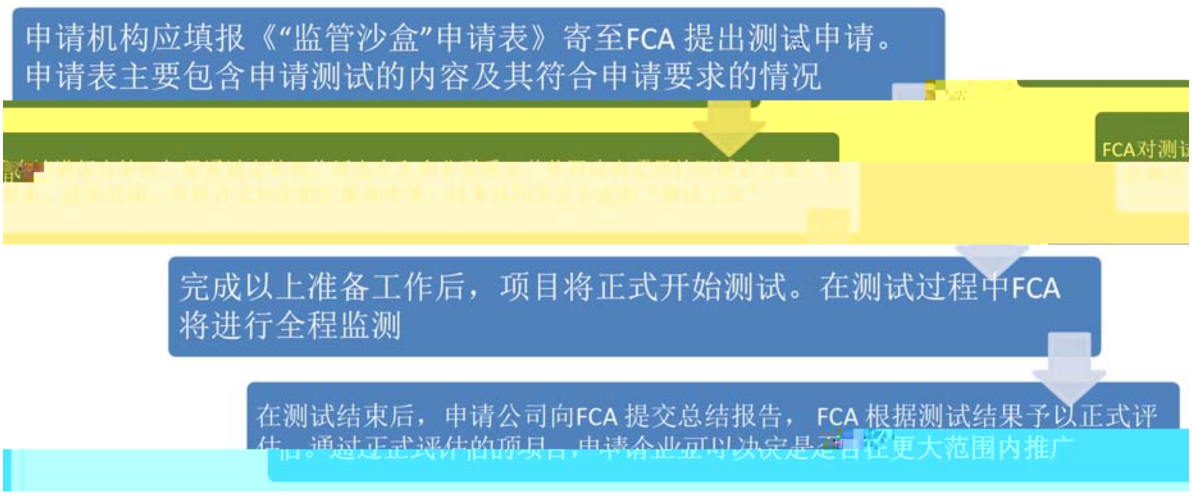

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(biometric authentication)	7
(soft token)	3
(chatbot)	2
(distributed ledger technologies)	4
API	12
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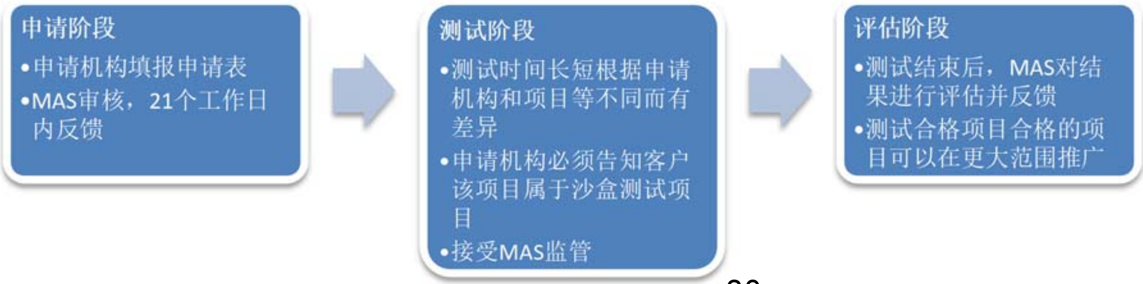
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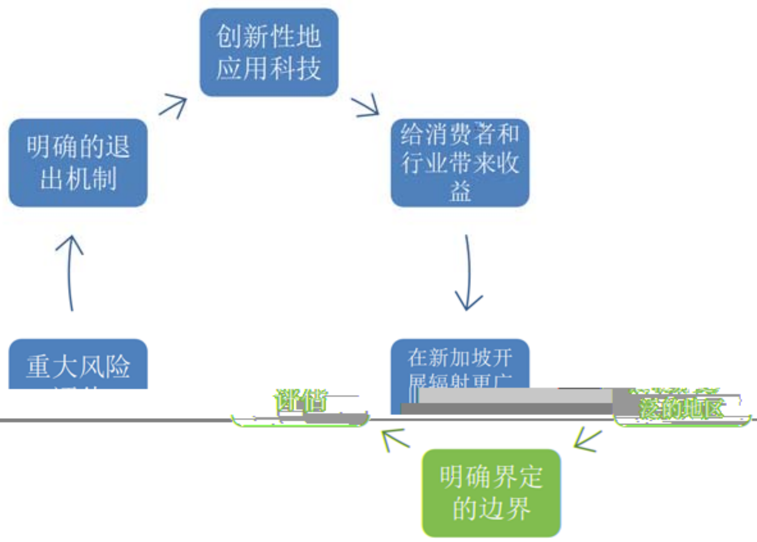
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[1]. Fintech regulatory sandbox guidelines, Monetary Authority of Singapore 2016.

[2]. Response to feedback received- Fintech regulatory sandbox guidelines, 2016.

[3]. Regulatory Sandbox, Financial Conduct Authority, 2015.

[4]. Regulatory Sandbox Lessons Learned Report, 2017.

[5]. Jenik, Ivo, and Kate Lauer. 2017. "Regulatory Sandboxes and Financial Inclusion." Working Paper. Washington, D.C.: CGAP.

[6]. , . [J]. , 2017(2):70-71.

[7]. , . [J]. , 2017(2):68-69.

[8]. ICO 2017.

[9]. 2017.

[10]. . " " [J]. , 2017(5):22-35.

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