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Moneylending and Transparency: What Can We Learn from Consumer Experiences with Onelyst?

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The Centre for Banking & Finance Law (CBFL) at the Faculty of Law, National University of Singapore, seeks to generate scholarship and promote thinking about the vibrancy, robustness and soundness of the banking sector, capital markets and other financial services. Through the research our scholars undertake and the events we organise, we seek to create and share knowledge, to engage stakeholders in an exchange of ideas, and to enhance the appreciation of legal and regulatory issues. We aim to bring greater theoretical and analytical clarity to these issues, to examine their policy impact, and to be a catalyst for ideas on how to improve banking and financial systems at the national, regional and global levels.

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ABSTRACT:

This report analyses one service that is attempting to bring increased transparency and competition to the moneylending market in Singapore. It is the result of an exciting collaboration between academia (National University of Singapore & Oxford University, Jodi Gardner), a consumer organisation (Credit Counselling Singapore, Tan Huey Min) and the commercial sector (Onelyst, Mohamed Abbas, Hizam Ismail, Prakash Raja). The collaboration was developed to analyse consumer experiences using Onelyst's loan comparison tools and to determine what this may show us about transparency and moneylending in Singapore. There are three main sections. The first discusses the background to the report and collaboration. The second outlines the empirical research, including the methodology used and the survey responses. The third and final section considers what we can learn from the process, including the importance of undertaken further qualitative empirical research on this topic.

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with Tan Huey Min,² Mohamed Abbas,³ Hizam Ismail⁴ and Prakash Raja⁵

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Introduction

Increased transparency has significant and well reported benefits to both consumers and marketplace efficiency. It allows people to make more informed choices and increases competition. In context of credit decisions, competition often works well for larger financial products when people have time to devote to comparing the market and finding the best available deal. When it comes to smaller loans, people often need the funds quickly and, because of the size of the loan being obtained, differences in interest rates may only result in savings of a few dollars. This provides little incentive for borrowers to get out and actively compare different loans. The problems related to competition in the moneylending market are widespread and experienced in many different countries; unfortunately, Singapore is not immune from these issues.

This report analyses one service that is attempting to bring increased transparency and competition to the moneylending market in Singapore. It is the result of an exciting collaboration between academia (National University of Singapore & Oxford University, Jodi Gardner), a consumer organisation (Credit Counselling Singapore, Tan Huey Min) and the commercial sector (Onelyst, Mohamed Abbas, Hizam Ismail, Prakash Raja). The collaboration was developed to analyse consumer experiences using Onelyst's loan comparison tools and to determine what this may show us about transparency and moneylending in Singapore. There are three main sections. The first discusses the background to the report and collaboration. The second outlines the empirical research, including the methodology used and the survey responses. The third and final section considers what we can learn from the process, including the importance of undertaken further qualitative empirical research on this topic.

Part 1: Background to this Report

The first part of this report outlines its background, including the relevant previous research conducted on moneylending, and the details of the collaboration between National University of Singapore, Onelyst and Credit Counselling Singapore.

1.1: Previous Research on Moneylending

I have previously undertaken a detailed review of the moneylending regime in Singapore and identified lack of transparency in the cost of loans to be one of the most significant factors impacting consumer's abilities to benefit from competition.⁶ The 2015 Report *Moneylending in Singapore: Looking at All Sides*, outlined the significant problems associated with transparency and credit. Here is an excerpt from the final report:

Healthy competition is a crucial part of all consumer credit regimes – borrowers should easily be able to compare and contrast different loans to determine what is most suitable for their needs. Unfortunately, it is very difficult (and in some cases impossible) for borrowers to do this in Singapore. Whilst some lenders were forthcoming about their fees and charges, many were not, and some even refused to provide this information until the borrower had applied for a loan. It was concerning to note that a large number of lenders (in excess of 25 firms) refused to provide details of their loan structure, interest rates or any other fees or charges until after the borrowers' application had been accepted and/or adequate identification had been provided. This creates a huge lack of transparency about the cost of loans, as well as significant difficulties for borrowers who may try and compare different lenders and products to determine what is best for their credit needs.

One clear recommendation from the fieldwork process is the requirement that all firms clearly advertise their interest rates, fees and charges. Whilst it is not currently a requirement under the Moneylenders Act to provide information about the cost of the loan until the lender receives a formal loan application, there are significant benefits for ensuring that this information is available a lot earlier. On entering a moneylending business, borrowers should be able to know how much the loan will cost them without having to ask an employee, provide identification or complete an application form. Ideally, this information would be clearly advertised in multiple languages on the business premises. This requirement will enhance industry competition and consumer empowerment, as well as decrease trade to unscrupulous lenders who may try and take advantage of inexperienced borrowers. Cost disclosure is a common legal requirement in a number of other countries, so something that Singapore should consider including in the moneylending legal regime.⁷

⁶ For ease of reading, this section is written from the first person perspective of the first author (Jodi Gardner), however it must be recognised that the report is a collaborative effort between all parties.

⁷ Jodi Gardner, *Regulating Moneylending in Singapore: Looking at All Sides* (Research Policy Paper, Centre for Banking & Finance Law 2015) 34.

One of the specific recommendations that arose from this report was that the moneylending regime in Singapore

should have an increased focus on transparency, ensuring that borrowers are fully aware of the cost and consequences of obtaining a loan from a moneylender. This includes a requirement for lenders to clearly advertise all interest rates, fees and charges, including penalty and default rates, on their premises and on all websites. This way borrowers will be able to make an informed and educated decision on their lending choices before they are in a contract with a moneylender.⁸

It was however clear that more research was needed, particularly to obtain information and evidence from the perspective of moneylending borrowers. I was therefore delighted when the Centre of Banking & Finance Law supported further research into this important issue.

1.2: About the Collaboration

In early 2016, one of the co-founders of Onelyst contacted myself and asked for a meeting to discuss the moneylending regime in Singapore and to share the experiences of Onelyst during its first 18 months on the market. This meeting was organised for September 2016, when I was returning to Singapore. During the meeting, it became clear that the impressive work being done by Onelyst, and the speed of its development and growth, provided significant scope for a better understanding of the consumer experiences in the moneylending market in Singapore. I was particularly interested in understanding the impact that a comparison tool had to the decision-making processes of individuals. We discussed the potential to survey a number of Onelyst users to find out this information for research purposes. It was however important to fully understand and appreciate the consumer aspect of the experience. We were therefore delighted when Tan Huey Min from Credit Counselling Singapore agreed to be involved and credit the project with her years of experience in consumer work and advocacy. I had previously interviewed Ms Tan for the Moneylenders Report (discussed above) and was aware of her significant experience and passion in this area.

1.3: About Onelyst

Onelyst was founded in March 2015 by Hizam Ismail, Prakash Raja and Mohamed Abbas. It was founded with the intention to increase transparency across the licensed moneylending industry and promote more efficient matching between borrowers and licensed moneylenders. As an online loan marketplace it enables borrowers to discover personalised loan offers from various licensed moneylenders in under five minutes. Loan terms are provided clearly to allow borrowers to compare their options and make informed financial decisions.

⁸ ibid 36.

The service is free for borrowers while licensed moneylenders pay a fee to access the platform. The pay structure is an important aspect of Onelyst. Unlike many other brokers, the company will receive the same revenue regardless of which loan the customer decides to take. This means that potential conflicts of interest between increased funds for themselves and recommending loans not in the best interests of the customer do not arise.⁹

1.4: About Credit Counselling Singapore

Credit Counselling Singapore has been operating since 2004 and ever since has been assisting people with an unsecured consumer debt problem.¹⁰ Services offered by the organisation include providing information on debt management to general public, conducting one-to-one debt advising session to distressed borrowers to better understand their financial positions, debt management options available and appropriate to address their debt issues, and working out a debt repayment plan for suitable borrowers who are able and willing to make repayment.

⁹ See Jonathan M. Macey and Geoffrey P. Miller, 'An Economic Analysis of Conflict of Interest Regulation' (1997) 82 Iowa Law Review 965.

¹⁰ Credit Counselling Singapore, 'About CCS: Who We Are', <http://www.ccs.org.sg/about-ccs>.

Part 2: Empirical Research Conducted

This section outlines the empirical research, which forms the basis of the Report. It includes a discussion of the methodology and the outcome of the survey responses.

Part 2.1: Methodology

Empirical research is defined as ‘the systematic collection of information (“data”) and its analysis according to some generally accepted method.’¹¹ This research project was designed to comply with the basic aspects of a high quality empirical research project, as suggested by Webley in her paper ‘Qualitative Approaches to Empirical Legal Research’.¹² Firstly, the most appropriate methodology to answer the research question within the relevant constraints was identified.¹³ In this case, the main constraints were limitations on the access to borrowers, ethics difficulties and timing constraints. In light of these challenges, we decided to conduct a simple online survey of Onelyst customers about their experiences with the product and the impact it made to their lending decisions. We aimed to get a total of 100 responses, as this would provide a broad and hopefully accurate portrayal of the lending situation. Secondly, the subjects needed to be appropriately selected. We decided that the most appropriate way to contact potential respondents was to send an email to them after they had completed their use of Onelyst inviting them to participate. Thirdly, the data collection method must be identified. In this case it was ‘counting’, which occurs ‘in quantitative research and includes use of surveys’.¹⁴ Due to the limitations involved in conducting research with multiple contributing authors (one of whom is based overseas) and through the use of an online program, it was decided to limit the data collection to quantitative empirical research that could be recorded and counted.

Finally, the ethical issues were considered.¹⁵ After discussions with all four authors, it was decided that all Onelyst customers should be sent a link inviting them to participate in the online survey. It was in no way mandatory; completion of the survey was not required to use the Onelyst program and participation did not impact the outcome/loans offered to the customer. However, to encourage people to participate, we did give them the chance to win \$100 (with the winner to be chosen at random at the conclusion of the survey process). We also decided not to ask people questions about their personal characteristics (i.e. income/salary, gender, age, educational level and profession). Whilst this information may have been useful to help develop a profile on the type of people who are using/benefiting from the service, obtaining details on the highly personal nature of people without providing consideration to each participate would not have been ethical.¹⁶

¹¹ Peter Cane and Herbert Kritzer, ‘Introduction’ in Peter Cane and Herbert Kritzer (eds), *The Oxford Handbook of Empirical Legal Research* (Oxford University Press 2010) 4. For a discussion on the use of empirical research in the social sciences, see Christopher McCrudden, ‘Legal Research and the Social Sciences’ (2006) 122 *Law Quarterly Review* 632, 632-650.

¹² One aspect of research design suggested by Webley, taking into account whether the research should be conducted alone or in a team, was irrelevant to the process (as a team had already been organised) and is not discussed: *ibid* 932.

¹³ *ibid* 932.

¹⁴ Kim Scheppele, ‘Counting, Reading, Interacting: Focusing on the Activities of the Researcher in Thinking about Methods’ paper presented at the Law and Society Association Early Career Workshop 2009, Denver, referred to in Laura Nielson, ‘Counting, Reading, Interacting: Focusing on the Activities of the Researcher in Thinking about Methods’ in Peter Cane and Herbert Kritzer (eds), *The Oxford Handbook of Empirical Legal Research* (Oxford University Press 2010) 954.

¹⁵ Webley (n 36) 932.

¹⁶ S. Thompson, *Paying Respondents and Informants* (University of Surrey Social Research Update 1999).

Part 2.2: Survey Responses

It is clear that most borrowers found the searches of Onelyst helpful. When asked ‘How happy were you with Onelyst’s service?’ on a scale of 1-5 (with one being the lowest and five the highest), almost half of the respondents indicated that they were ‘very happy’ with the company.

Table 1: Customer Satisfaction Rates

Score	Response Rate
1 (not happy)	2%
2	1%
3	15%
4	34%
5 (very happy)	48%

These answers are highly reflective of the transparency provided by Onelyst. When asked ‘How clear were the terms and conditions of your loan, including the fees and charges involved?’ on a scale of 1-5 (with one being the lowest and five being the highest), 45% of respondents indicated that they believed the terms and conditions were ‘very clear’. The response for the other scores (1-4) also show a remarkable similarity to the satisfaction rates discussed above.

Table 2: Clarity of the Loan Terms and Conditions

Score	Response Rate
1 (not clear)	1%
2	5%
3	15%
4	34%
5 (very clear)	45%

The general approval of Onelyst was further highlighted by the fact that 94% of all respondents indicated that they would recommend the company to friends and/or family.¹⁷ The same number of people believe that Onelyst is helping people make better financial decisions.¹⁸

When given the option to make comments about how the consumer experience with Onelyst could be improved, most respondents were positive. Some of the comments included:

- ‘I think Onelyst is already providing a very good service is creating a platform in matching both borrower and lender.’
- ‘Nothing to improve as all terms are already stated.’
- ‘I believe that you are already very detail and helpful to people who needs help.’

¹⁷ See question 5 of the survey in Appendix 1.

¹⁸ See question 9 of the survey in Appendix 1.

- ‘Overall, I’m simply happy with onelyst in showing me the loans that suits my need. Onelyst gave me a variety of legal moneylended[er]s that offers the best rate and monthly payments according to my needs. Keep up with the good service !’
- ‘So far it has been quite smooth & simple.’

There were limited criticisms, including some people wanting a better rate/lower interest, quicker lender approval and/or rejection, and adding more moneylenders to the service to increase choice. These are largely outside of the company’s control, but are things that Onelyst could discuss with lenders who use their service to try and improve customer’s experiences.

One interesting suggestion made by three respondents was the idea of giving consumer’s the right to review and make comments about the moneylenders they had used. This would allow a qualitative dimension to the decision making process, instead of just leaving it to information on interest rates and penalty fees. It may also help with the problems discussed above, as if some lenders were taking a significant amount of time to approve or reject loan applications, this feedback could be included in the review and potentially result in increased performance by the lender.

One of the clearest examples of the benefits of transparency and competition is the impact that Onelyst services has on the cost of loans to borrowers. In 2015, the Ministry of Law announced an interest rate cap on moneylenders of 4% per month¹⁹, with an administrative fee of 10% of the principal loan²⁰ and an additional late interest of 4% per month²¹ plus a \$60 fee.²² Most moneylenders operating are charging a flat 4% interest rate, however lower finance charges may be given to preferred (generally repeat) customers. Using the Onelyst service, users are able to obtain lower rates of interest and lower fees. For example, one lender was offering loans with 0.8% interest per month, a 6.8% administrative fee and late interest of 1% per month plus a \$38 fee.²³ On a \$2,000 loan for one month, this represents a saving of \$128 and a further saving of \$82 if the borrower defaults for a further month. These financial benefits have also been supported by economic modelling based on Onelyst lending data.²⁴ This model of transparency and competition between lenders can clearly provide real and substantial benefits for borrowers, creating a more efficient market in Singapore.

¹⁹ Moneylenders Rules 2009 (No. S 72), r 11(1).

²⁰ Moneylenders Rules 2009 (No. S 72), r 12(1)(b).

²¹ Moneylenders Rules 2009 (No. S 72), r 11(3).

²² Moneylenders Rules 2009 (No. S 72), r 12(1)(a).

²³ Hypothetical borrower data used to obtain information on the website on 27 February 2017.

²⁴ See Lee Jia Shing Jasmine, Nabilah Bte Isa, Yang Mengying, *A Study on Borrower Choice and Market Competition in Singapore’s Moneylending Market* (2016), Final Year Project submitted to the School of Humanities and Social Sciences, Nanyang Technological University in partial fulfilment of the requirements for the Degree of Bachelor of Arts in Economics.

Part 3: What Can We Learn?

This section highlights the value of the survey process and discusses what lessons can be taken from the consumer experiences with Onelyst.

3.1: Benefits of Transparency

It is clear that there are significant benefits to transparency. It improves consumer experience, lowers prices and increases market efficiency. Research conducted by Hodge, Kennedy and Maines highlights that search facilitating technology is one of the ways this can occur. They stated

Our results suggest that search-facilitating technologies ... aid financial statement users by improving the transparency of firms' financial statement information and managers' choices for reporting that information. Our results also reveal that wide publicity about the benefits of using search-facilitating technology may be needed to induce financial statement users to access the technology.²⁵

These benefits have also been confirmed by various financial regulators. For example, recent concerns about the lack of effective competition in the high-cost credit market in the United Kingdom resulted in the Competition & Markets Authority recommending the development of a price comparison website for these types of financial products.²⁶ The findings from the consumer surveys (discussed above) highlight that Singapore consumers are obtaining similar benefits by using the Onelyst service. It provides a simple way for people to compare loans and make better financial decisions.

3.2: Expanding the Benefits

As the significant benefits of increased transparency have been outlined, it is important to see if the product/model can be expanded to other people and/or products. Due to the nature of Onelyst, it is likely to attract people from a reasonably limited social group.²⁷ This is highlighted by the information on how respondents found out about the product.

Table 3: How Did the Consumer Find Onelyst

Answer	Response Rate
Google Search	45%
Facebook Advertising	41%
Google Advertising	9%
Friend or Relative Recommendation	5%

²⁵ See Frank D. Hodge, Jane Jollineau Kennedy and Lauren A. Maines, 'Does Search-Facilitating Technology Improve the Transparency of Financial Reporting?' (2004) 79 *The Accounting Review* 687, 687.

²⁶ See Competition & Markets Authority, *Payday Lending Market Investigation: Provisional Decision on Remedies* (2014).

²⁷ This is however assumed from the type of product and its intended audience. Further information, including obtaining a complete borrower profile, is necessary to confirm this assumption (see discussion in Part 3.3 below).

As outlined in Table 3, 95% of all borrowers found out about Onelyst through various internet-based methods. This is not surprising, as Onelyst is itself an internet-based platform. It does raise issues of how the benefits of transparency can be obtained for other moneylending borrowers, largely people who do not have access to the internet²⁸ or who prefer to conduct their financial affairs in a face-to-face manner.²⁹ This is a challenge for both the private sector and government; how can we encourage people who avoid using the internet for financial decisions to engage with competition and transparency?

There is also clear consumer demand to expand the service beyond the one-time repayment model, to longer loans with regular repayments. For example, when asked how the consumer experience with Onelyst could be improved, 11% of respondents asked for the company to provide a greater range of products, specifically longer term loans with regular repayments. This was, by far, the most common feedback provided from the survey process. One of the benefits of Onelyst is its simplicity and the ease in which different loans can be compared. If multiple options, including loans being repaid over multiple occasions, were included it may impact the borrowers' ability to appreciate the benefits of the product. Further research is necessary to fully understand if and how this type of product can be expanded to other loan structures.

3.3: Amount of Debt Owing

When asked about how much outstanding unsecured debt they owed, respondents were given 10 different options, up to 'in excess of \$200,000'. Levels of unsecured debt in Singapore is a significant problem, and one in which the Ministry of Law and Monetary Authority of Singapore is diligently trying to address.³⁰ Fortunately, no respondents surveyed owed outstanding loans of over \$100,000, and only 8% owed more than \$15,000. Almost half of respondents (45%) owed less than \$2,500.

Table 4: Unsecured Debt Owed

Answer	Response Rate
Less than \$2,500	45%
≥\$2,500 but less than \$5,000	24%
≥\$5,000 but less than \$7,500	8%
≥\$7,500 but less than \$10,000	7%
≥\$10,000 but less than \$15,000	8%
≥\$15,000 but less than \$30,000	3%
≥\$30,000 but less than \$50,000	3%
≥\$50,000 but less than \$100,000	2%
≥\$100,000 but less than \$200,000	0%
≥\$200,000	0%

²⁸ 17.5% of people in Singapore do not have access to the Internet (equating to approximately one million people): Internet Live States, 'Singapore Internet Users', <http://www.internetlivestats.com/internet-users/singapore/>.

²⁹ Competition & Markets Authority, *Research into the Payday Lending Market* (2014) highlights that many people prefer to use high-street (i.e. in person) moneylenders as they prefer the face-to-face transaction or do not trust the internet with their financial details. See also discussion in Jodi Gardner, 'Payday Lending: Locating the Sources of Trust in an Untrustworthy Industry' (Trust and Empirical Evidence in Law Making and Legal Process Conference, Oxford, June 2015).

³⁰ This is discussed in Jodi Gardner, 'Unsecured Credit, Moneylending & Protection of a Social Minimum in Singapore' (2017) 4(1) *Studies in Asian Social Sciences* 1.

Furthermore, seven out of ten (70%) users of Onelyst did not have any outstanding loans owing to banks.³¹ These findings are largely comforting, as they highlight that the majority of people who need access to moneylending are not already in significant amounts of unsecured debt. The finding would however be strengthened with further research on income levels of consumers and from where the unsecured debt arose (i.e. other moneylenders, banks, credit cards etc.).

3.4: Financial Alternatives and Illegal Lending

One of the most significant concerns with the regulation of moneylending in Singapore is the potential relationship between licensed businesses and illegal lenders. There are fears from a number of different stakeholders that if licensed moneylending is regulated too harshly, people unable to access funds from these sources will be pushed into the hands of loan sharks. Due to the difficulty in obtaining reliable information on illegal lending (people are generally hesitant to admit to using these services), it is problematic to obtain reliable information about the relationship between moneylending and loan sharks.³² The current exercise provides a very useful insight into the borrowing decisions of the respondents. Onelyst borrowers were asked 'If you were unable to obtain a loan through Onelyst, what would you have done?'

Table 5: Financial Alternatives if Unable to Access Loan

Answer	Response Rate
Borrow from an illegal lender	3%
Go to a pawnbroker	3%
Sell valuables	4%
Borrow from employer	9%
Apply for a bank loan	11%
Borrow from a friend or relative	27%
Approach moneylender directly	43%

As outlined in Table 5, 3% of all respondents would have tried to borrow from an illegal lender. Whilst this figure may seem small, it is still disturbing. Considering the large number of people borrowing from moneylenders, even 3% is too high. The results are also unlikely to accurately highlight the number of people who would potentially become involved in illegal lending. The figure may be significantly higher if the respondent's next option (borrow from employer, apply for a bank loan, borrow from a friend/relative, or apply to the moneylender directly) was also unsuccessful. There are however some positive results from the survey process. When asked the main reason why they chose to borrow from a licensed money lender instead of other sources, two-thirds of the respondents (67%) stated that they didn't want to borrow from an unlicensed moneylender.³³

³¹ See question 6 of the survey in Appendix 1.

³² See discussion in Jodi Gardner, *Regulating Moneylending in Singapore: Looking at All Sides* (Research Policy Paper, Centre for Banking & Finance Law 2015) 25-27.

³³ See question 8 of the survey in Appendix 1.

This area would benefit from further qualitative research (discussed further below) to obtain a more accurate understanding of borrowers' motives and the relationship between financial exclusion and illegal lending in Singapore.

3.3: Developing Qualitative Research

Whilst the survey process has been exceptionally useful and has provided a unique insight into the borrowing decisions of the respondents, there are significant limitations to quantitative empirical research. Bright and Whitehouse highlight that empirical legal studies are generally associated with the positive tradition, meaning that quantitative work tends to dominate the field.³⁴ The findings outlined in this Report would benefit from qualitative research, particularly in the form of in-depth interviews with borrowers.³⁵ This section has already outlined a number of areas where this occurs, including the amount, type and cause of outstanding debts and the potential relationship between moneylending and loan sharks in Singapore.

Qualitative and quantitative research have different methodologies and research outcomes. As outlined by Kirk and Miller 'technically, a "qualitative observation" identifies the presence or absence of something, in contrast to a "quantitative observation" which involves measuring the degree to which some feature is present.'³⁶ We have identified the presence of certain aspects of transparency and competition in the moneylending market through the surveys conducted, but to obtain a greater understanding of the degree and extent that this impacts the decision-making we need to go further. The transition from quantitative to qualitative research is quite a natural research methodological development. As outlined by Neilson, 'quantitative results ... often raise new questions that the researcher goes on to answer using ... qualitative analysis'.³⁷ This process has clearly occurred in the current situation.

³⁴ Susan Bright and Lisa Whitehouse, 'The Opportunities and Challenges of Empirical Work: Housing Possession in Theory and in Practice' in Bram Akkermans, Eveline Ramaekers and Ernst Marais (eds), *Property Law Perspective II* (Intersentia 2013).

³⁵ For research findings based on qualitative research with moneylending borrowers, see Lindsey Appleyard, Karen Rowlingson and Jodi Gardner, 'The variegated financialization of sub-prime credit markets' (2016) Forthcoming *Competition & Change*; Jodi Gardner, Karen Rowlingson and Lindsey Appleyard, 'Responsible Borrowing and Lending' (International Conference on Trade, Business, Economics and Law, Oxford, 2-4 March 2015); and Karen Rowlingson, Lindsey Appleyard and Jodi Gardner, 'Payday lending in the UK: the regul(arisation) of a necessary evil?' (2016) 45 *Journal of Social Policy* 527. The process was also evident in the research methods used by the Competition & Markets Authority when analysing the high-cost credit market in the UK: Competition & Markets Authority, *Research into the Payday Lending Market* (n 29).

³⁶ Kirk and Miller cited in Lisa Webley, 'Qualitative Approaches to Empirical Legal Research' in Peter Cane and Herbert Kritzer (eds), *The Oxford Handbook of Empirical Legal Research* (Oxford University Press 2010) 927.

³⁷ Laura Nielson, 'Counting, Reading, Interacting: Focusing on the Activities of the Researcher in Thinking about Methods' in Peter Cane and Herbert Kritzer (eds), *The Oxford Handbook of Empirical Legal Research* (Oxford University Press 2010) 955.

Conclusion

The results of this collaborative effort have provided interesting outcomes, as well as ways in which this research can be further developed. It is clear that there are significant benefits to increased transparency in the moneylending market in Singapore, however further work should be completed to enhance and maximise these benefits for all borrowers. The process has also provided interesting insights into the outstanding debts of moneylending borrowers and the potential relationship between legal and illegal lending. Surveys of this kind, however useful, have a limited nature and the findings obtained would be strengthened by the opportunity to interview borrowers, and potentially moneylending firms, about their experiences and perspectives on competition in the market.

We would like to take the opportunity to thank the Centre for Banking & Finance Law, Onelyst and Credit Counselling Singapore for their support of this project. The hard work and dedication of the Ministry of Law and Monetary Authority of Singapore must also be recognised. It has been an interesting and informative process that would not have been possible without all the parties involved. Moneylending is a difficult area in which to research and regulate. A fine balance needs to be struck between providing a market safe from exploitation and over-indebtedness, whilst also not pushing people into financial exclusion or the hands of loan sharks. We hope that this Report will assist in finding this line.

Appendix 1: Survey Questions

1.	How did you find out about Onelyst?	<p><u>Options</u></p> <p>1) Internet</p> <p>2) Friend/Relative</p> <p>3) Advertisements (Note: provided there was advertisement)</p> <p>4) Media coverage (Note: provided there was media coverage)</p> <p>5) Facebook Advertisements</p> <p>6) Others (please specify):</p>
2.	<p>How satisfied were you with Onelyst’s product and service?</p> <p>(On a scale 1-5, one being very unhappy and 5 being very happy)</p>	<p><u>Drop down list of Freehand</u></p>
3.	<p>How clear was the terms and conditions of your loan, including the fees and charges involved?</p> <p>(On a scale 1-5, one being very unclear and 10 being very clear)</p>	<p><u>Drop down list or Freehand</u></p>
4.	If you were unable to obtain a loan through Onelyst, what would you have done?	<p><u>Options</u></p> <p>1) Visit the money lender company directly</p> <p>2) Apply the loan with a bank</p> <p>3) Pawn jewelry</p> <p>4) Sell away shares / other valuables</p> <p>5) Borrow from friend/relative</p> <p>6) Borrow from my employer</p> <p>7) Borrow from unlicensed money lender</p> <p>8) Other (please specify):</p>
5.	Are you likely to refer Onelyst to a friend?	<p><u>Drop down list</u></p>

		<ul style="list-style-type: none"> 1) Yes 2) No 3) Maybe
6.	Do you have unsecured debts owing to banks (eg. credit card, personal loan)	<p><u>Drop down list</u></p> <ul style="list-style-type: none"> 1) Yes 2) No
7.	Is this your first time borrowing from a licensed money lender	<p><u>Drop down list</u></p> <ul style="list-style-type: none"> 1) Yes 2) No
8.	The 3 main reasons you choose to borrow from a licensed money lender instead of from other sources	<p><u>Options</u></p> <ul style="list-style-type: none"> 1) The bank(s) did not approve my loan application(s) 2) I have nothing valuable to pawn 3) My friend/relative did not want to lend me money 4) My friend/relative have no money to lend me 5) I don't want to borrow money from people I know 6) I don't want to borrow from the unlicensed money lender 7) Other (please specify):
9.	Do you think Onelyst is helping people to make better borrowing decision?	<p><u>Drop down list</u></p> <ul style="list-style-type: none"> 1) Yes 2) No
10.	Roughly, how much money do you owe in total (exclude housing loan and car loan)	<p><u>Options</u></p> <ul style="list-style-type: none"> 1) Less than \$2,500 2) ≥\$2,500 but less than \$5,000 3) ≥\$5,000 but less than \$7,500 4) ≥\$7,500 but less than \$10,000

		<p>5) ≥\$10,000 but less than \$15,000</p> <p>6) ≥\$15,000 but less than \$30,000</p> <p>7) ≥\$30,000 but less than \$50,000</p> <p>8) ≥\$50,000 but less than \$100,000</p> <p>9) ≥\$100,000 but less than \$200,000</p> <p>10) ≥\$200,000</p>
11.	How can we improve your experience with Onelyst?	Freehand