



**BANK OF GHANA**

(FINANCIAL STABILITY DEPARTMENT)

**CREDIT REFERENCING ACTIVITY**

**ANNUAL REPORT**

**2019**

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BoG Bank of Ghana

MFIs Microfinance Institutions

RCBs Rural and Community Banks

NBFIs Non-Bank Financial Institutions

FH Finance Houses

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## **1. Introduction**

The credit referencing system in Ghana has undoubtedly supported the banking sector, specifically in the credit market, since its introduction in 2008 with the provision of credit reports to facilitate the credit underwriting and administration processes of Banks and SDIs.

The Bank of Ghana which has the overall supervisory and regulatory authority in all matters relating to credit reporting under the Credit Reporting Act, 2007 (ACT 726) has over the years supported the credit referencing system through training and sensitization of financial institutions and the general public. As part of its supervisory activities, the Bank of Ghana in 2019 continued its monitoring of credit reference bureaus and financial institutions to ensure compliance with Act 726 and other directives issued by the Bank in areas such as data provider operations, data quality and protection, dispute resolution, submission of reports, application of sanctions and other incidental matters.

As with previous years, there was an increase in credit referencing activities in 2019 as monitored by the Bank of Ghana. For instance usage of credit reports increased by 7% compared to the previous year.

The consistent improvements in this financial infrastructure is as a result of the support of all stakeholders and increased general awareness of the importance of the credit referencing system.

This report presents the performance, key developments and trends in credit referencing system in Ghana in 2019.

## **2. Developments in the Credit Reporting System in Ghana**

The Bank of Ghana continued to engage its stakeholders in the Credit Referencing System with the aim of developing this critical infrastructure especially during the post banking sector clean up exercise in 2019. The Credit Referencing System served as a tool for loan recoveries especially relating to customers of defunct institutions.

This section of the report discusses some of the key developments in the credit reporting sector.

### **2.1 Development of Credit Reporting Regulations**

The Bank of Ghana with support from the Ministry of Finance completed the processes for the development of the Credit Reporting Regulations. The Regulations have been passed by Parliament and came into force on 05 March, 2020. The Regulations are to provide for effective implementation of the Credit Reporting Act, 2007 (ACT 726) and incorporate best practices in the credit reporting system.

The Regulations make provision for data submission rules, data protection and quality rules, credit bureau corporate governance requirements, dispute resolutions and sanctions for non-compliance. In addition the Regulations provide for additional sources of data for the credit bureaus and include government institutions that provide credit facilities, utility companies, telecommunication companies, retailers, etc.

## **2.2. Increased Consumer Complaints**

The year under review witnessed a surge in the number of complaints received by the Bank of Ghana and financial institutions in relation to credit reports issued by credit bureaus. These complaints related to customers of defunct financial institutions who had adverse information on their credit reports, either due to non-payment of previous loans or reports not updated by respective defunct institutions. The complaints are an indication of effective use of the credit referencing system by lenders as affected customers were denied new credit facilities by lenders for having adverse reports. The increasing number of complaints may also be due to increased awareness of the credit referencing system by the general public.

The Bank of Ghana in collaboration with the Receivers of the defunct lenders resolved complaints relating to incomplete credit reports. The increased complaints also resulted in some affected customers settling their previous indebtedness with the Receivers.

## **3. Industry Participants**

### **3.1 Credit Bureaus**

All three licensed credit bureaus participated in the collection of data from lenders and provided various credit referencing products and services to lenders.

These products and services were patronized by financial institutions in their credit appraisal and management processes, KYC and credit recovery procedures. This is in line with the requirement of the Credit Reporting Act, 2007 (ACT 726) which compels all financial institutions licensed by the Bank of Ghana to submit credit



data and obtain credit reports from licensed credit bureaus before approval or refusal of credit facilities to prospective borrowers.

Credit bureaus also improved upon their data collection efforts and played key roles in improving the quality of data obtained from lenders.

### **3.2 Financial Institutions**

In line with Section 24 of the Credit Reporting Act, 2007 (ACT 726), all financial institutions licensed by the Bank of Ghana are mandated to submit data on borrowers to credit reference bureaus within 72 hours of entering into credit agreements and update the status of the facilities on monthly basis.

The year under review recorded an improvement in terms of financial institutions compliance with submission of data to credit bureaus and conduct of credit searches prior to loan approvals.

All banks submitted data consistently to all credit bureaus in 2019. There were however recorded instances of delayed submission which has a potential of creating disputes. The requirement for submission of data to all credit bureaus at same time<sup>1</sup> was also breached by some banks.

An average of Forty-three (43) Savings and Loans Companies and Finance Houses submitted data consistently to credit bureaus. This is an improvement over previous years.

Rural and Community Banks that consistently submitted data and used the services of credit bureaus also improved compared to the previous year. Forty-eight RCBs submitted data consistently compared to twenty-seven (27) in 2018.

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<sup>1</sup> Financial institutions have been directed to submit data to credit bureaus on same day and minimal time difference

Participation from the microfinance sub sector remained a concern in the year under review. Despite an observed increase in microfinance institutions conducting credit searches, only a few MFIs submitted data consistently to credit bureaus. High staff turnover in this sub sector partly accounted for the poor level of compliance.

### **3.3 Others**

Through the efforts of credit bureaus, a number of retailers began sharing their credit data and used the services of credit bureaus in their credit delivery services.

## **4. Products and Services offered by the Credit Bureaus**

Per the requirement of the Credit Reporting Act, 2007 (ACT 726), credit bureaus may gather, maintain and process credit related data into credit reports or other products for the use of financial institutions in their credit administration processes and for respective data subjects. There were no new products introduced in the year under review.

The following existing products and services were provided by the respective credit bureaus:

### **XDS Data Ghana**

- i. *Consumer Basic Trace Report*: This contains information on personal details, credit account summary, address history, guarantor details and telephone history. This is designed to help the lender in completing “know your customer” (KYC) documentation on the customer.
- ii. *Consumer Basic Credit Report*: This contains personal information, credit account summary, detailed credit facility status, and monthly payment behaviour.

- iii. *Detailed Credit Profile Report*: In addition to the information contained in the Basic Credit Report, this report includes a section on the status (performing and non-performing) of all facilities held by the borrower. This information is very useful in determining the behaviour and exposure of borrowers.
- iv. *Basic Commercial Report*: It contains company registration details, directors and credit account summary. It is designed to provide background information on companies and basic information on credit exposure.
- v. *Full Commercial Report*: In addition to the information contained in the Basic Commercial Report, this report includes credit facility status, and payment behaviour that helps lenders to determine the risk profile of potential borrowers.

#### **Hudson Price Data Solutions Limited**

- *Quick Loan Check*– This is an online (real-time) application, designed to detect and protect against financial loss to lenders. This report is generated from information obtained from the Controller and Accountant Generals Department (CAGD) mainly for payroll-based lenders. With this report, lenders are able to authenticate the identity of borrowers and determine their borrowing capacity.
- *Credit Bureau Data Validation Suite* – This tool is designed to help data providers convert data from their system into the new data format rolled out by the Bank of Ghana.

- *Business Check* – This engine allows subscribers to verify the validity of company name, registration number, and Tax Identification Number (TIN) of registered entities.
- *Blacklisted Agent List* – This is a database for agents that have been blacklisted by financial institutions for reason of fraud or other malpractices.

#### **Dun & Bradstreet Credit Bureau Limited**

- *Consumer Credit Report* - Contains credit profile overview, credit profile summary, credit facility details, and demographic information. This report provides information on the credit exposure and repayment history of borrowers, and empowers lenders to make better credit risk decisions.
- *Commercial Credit Report* – This presents the credit history, demographic information and company profiles.
- *Industry Reports* – These include variety of products to enhance the Know Your Customer (KYC) procedures of financial institutions with respect to banks' business customers.

#### **4. Usage of Credit Bureau Services**

A total number of **2,820,946** enquiries were made on the databases of credit bureaus in 2019. This represented an increase of **7%** from last year's position of **2,629,400** enquiries as presented in the table below:

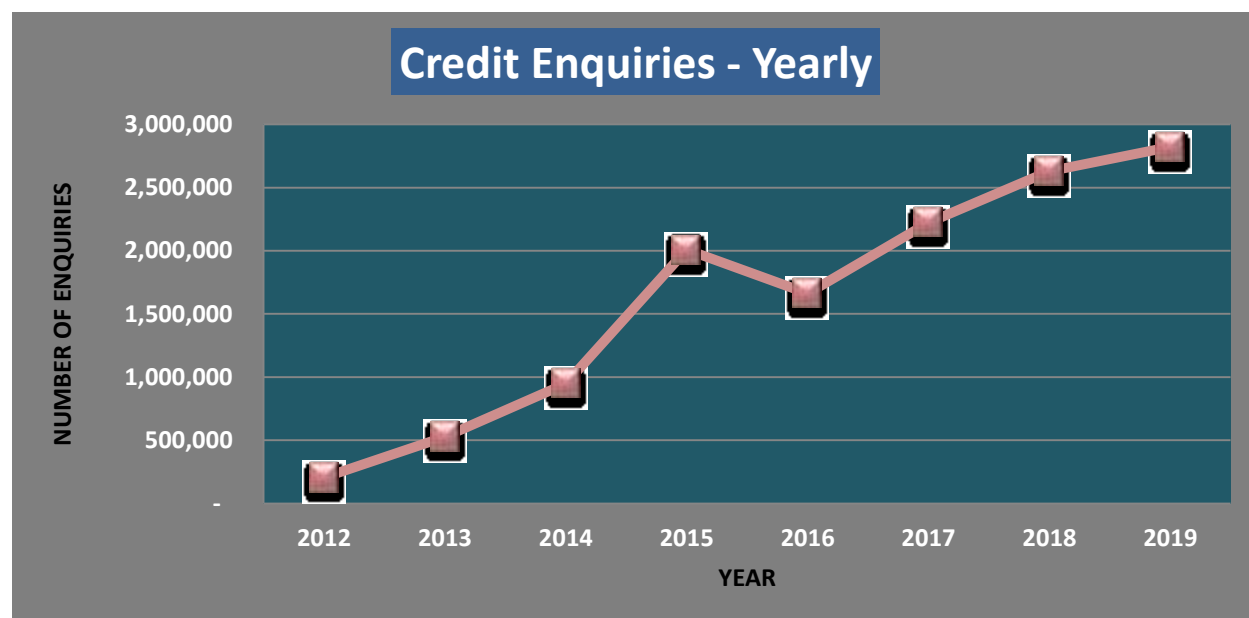
*Table A: Trend in Total Credit Enquiry*

YEAR	TOTAL ENQUIRIES	% Change
<b>2019</b>	<b>2,820,946</b>	<b>7</b>
2018	2,629,400	18
2017	2,222,311	34
2016	1,662,740	-17
2015	2,008,170	111
2014	948,360	79
2013	528,491	156
2012	205,949	

The consistent increase in the use of credit bureau services affirms the importance of the credit referencing system in the credit administration processes of lenders and lately for other purposes to be discussed in this report.

It is now evident that a great number of lenders use the services of the credit bureaus for the associated benefits rather than for mere regulatory compliance. In line with Act 726, licensed financial institutions are mandated to conduct credit searches on prospective borrowers prior to granting or refusal of credit facilities.

*Chart A: Trend in Yearly Credit Enquiry*



There was an average of 235,079 enquiries conducted by financial institutions on a monthly basis in the year under review. A monthly distribution of enquiries conducted by types of financial institutions is presented in the table below:

*Table B: 2019 Enquiries*

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<b>BANKS</b>	47,329	59,995	98,536	61,512	87,449	99,358	72,472	63,491	97,893	61,952	59,766	83,983
<b>NBFIs</b>	80,669	164,380	183,921	148,595	155,496	153,052	138,141	139,403	117,817	104,341	117,151	80,283
<b>RCBs</b>	13,447	16,313	18,491	15,392	17,735	15,060	16,698	17,247	15,437	16,810	16,034	13,791
<b>MFIs</b>	7,094	9,678	10,375	5,614	15,291	9,917	10,295	12,642	12,502	12,670	14,293	14,874
<b>Others</b>	1,164	1,010	1,172	989	1,699	1,012	1,326	1,592	1,306	1,553	1,798	1,640
<b>TOTAL</b>	<b>149,703</b>	<b>251,376</b>	<b>312,495</b>	<b>232,102</b>	<b>277,670</b>	<b>278,399</b>	<b>238,932</b>	<b>234,375</b>	<b>244,955</b>	<b>197,326</b>	<b>209,042</b>	<b>194,571</b>

#### **4.1 HIT/NO HITS**

61% of all enquiries conducted on the database of credit bureaus were regarded as hits. This means that the searches produced some information<sup>2</sup> on the persons being searched upon.

The remaining 39% searches did not produce any information. The following are possible reasons:

- That the person being searched upon has no current or previous credit facility (first-time borrowers), or
- That the credit information of the person being searched upon has not been submitted to the credit bureaus by the data provider, or
- Poor data quality and inconsistencies in identification information.

On the contrary some of the “No Hits” searches were as a result of the means<sup>3</sup> used to conduct the enquiries on the credit bureau's database. Due to the absence of unique identifier for conducting searches, a number of lenders who solely conduct searches based on the ID provided by borrowers are likely to miss out information on the borrower, relating to other IDs.

The absence of unique identifier in the credit market and the country as a whole has become a major contributory factor to the relatively poor quality of information in the credit bureau database.

The table below presents the Hits/No Hits enquiry statistics for the year under review compared to the previous year. It is anticipated that with improved data submission and increasing compliance, the database of credit bureaus would contain relevant data for the purpose of generating efficient credit reports. This

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<sup>2</sup> The information obtained could be only demographic or both demographic and financial. Due to varied source of data available to credit bureaus, they host some demographic data only on individuals and business.

<sup>3</sup> Due to the absence of unique identifier, credit bureaus allow searches on their database using any of the following; Name, ID, or Name/Date of Birth

would enhance the confidence attached to credit reports for making credit decisions.

*Table C: Hit/No Hit Enquiries*

	Number		Percentage	
	2018	2017	2018	2017
<b>Total Hits</b>	<b>1,732,628</b>	1,743,469	<b>61%</b>	66%
<b>No Hits</b>	<b>1,088,318</b>	885,930	<b>39%</b>	34%
<b>Total Enquiries</b>	<b>2,820,946</b>	2,629,400	<b>100%</b>	100%

#### **4.2 Credit Enquiries per Consumer type**

Enquiries made on individual borrowers/customers of financial institutions accounted for 70% of total enquiries in 2019. Enquiries on business customers increased by 25% compared to 5% of total enquiries in 2018.

*Table D: Enquiries by Consumer Type*

Consumer Type	Total Enquiries	Percentage
<b>Individual</b>	1,962,611	70%
<b>Business/Corporate</b>	858,335	30%

#### **4.3 Credit Enquiries per Institution type**

Savings and Loans Companies and Finance houses accounted for 56% of the total enquiries in 2019 making them the major users of the credit referencing system, a position the sector has maintained over the years. The increasing number of payroll lending as a main lending product of this sector explains the



continuous increase in enquiries. The table below shows the trend of enquiries among the different institution types.

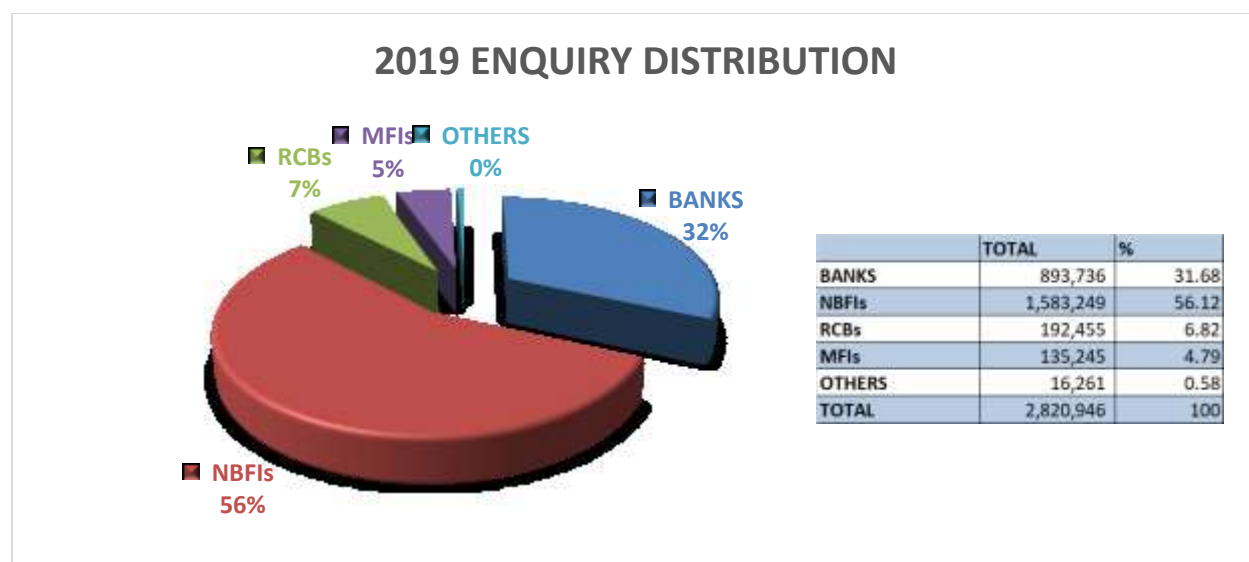
*Table E: Sectorial Distribution – Yearly Enquiries*

	2019	2018	2017	2016	2015
<b>BANKS</b>	893,736	739,765	227,956	215,881	274,211
<b>NBFIs</b>	1,583,249	1,569,032	1,793,372	1,300,053	1,598,157
<b>RCBs</b>	192,455	212,553	118,396	108,565	81,710
<b>MFIs</b>	135,245	85,997	80,582	34,906	54,092
<b>OTHERS</b>	16,261	22,052	2,005	1,319	
<b>TOTAL</b>	2,820,946	2,629,400	2,222,311	1,660,724	2,008,170

Enquiries conducted by Banks increased by 3% compared to 2018 position of 28% of total enquiries.

There was a reduction in enquiries from the Rural and Community Banks compared to the previous year. RCBs conducted 192,455 searches representing a reduction of 10% of enquiries from 2018. It was observed that compliance among the RCBs declined due to very high staff turnover on the roles relating to credit referencing.

Chat B: Sectoral Distribution of Enquiries in 2019



There was a surge of enquiries in the Microfinance Companies subsector with a total of 135,245 enquiries. This represented a 57% increase from 2018 position of 85,997 enquiries.

Chart B above shows the distribution of enquiries for the year 2019 among the different sectors of the industry:

#### **4.4 Purpose of Enquiries**

Financial institutions use the services of credit bureaus for several purposes. In line with Act 726 financial institutions are mandated to use the services of credit bureaus to aid credit decision making. Specifically, Section 26 of Act 926 directs licensed financial institutions to conduct credit searches on prospective borrowers prior to approving or denying credit facilities. Financial institutions are also required to use the services of credit bureaus for credit monitoring purposes.

Due to the scope of data available to credit bureaus, financial institutions also use the services of credit bureaus for other purposes as indicated in the table below:

*Table F: Purpose of Enquiries*

<b>Purpose of Enquiry</b>	<b>Number of Enquiries</b>	<b>%</b>
Credit Application	2,076,999	74
KYC	6,207	0.22
Loan Recoveries	105,747	4
Review of Guarantor	8,747	0.3
Review of Existing Customer	545,946	19
Others	77,300	3
<b>TOTAL</b>	<b>2,820,946</b>	<b>100</b>

Credit Enquiries for the purpose of credit application constituted 74% of total enquiries. The table also indicates that financial institutions are currently using the services of credit bureaus for loan recovery purposes.

It was also noted that financial institutions use of credit bureau services for credit monitoring purposes increased by 12% compared to the previous year. It is anticipated that continuous use of credit reports for monitoring portfolios will enable lenders adequately foresee and mitigate potential adverse credit facilities.

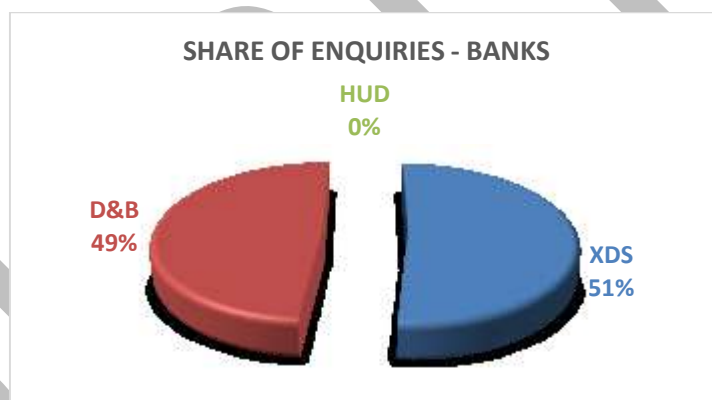
#### **4.5 Credit Bureau Share of Enquiries**

All licensed credit bureaus actively engaged in the selling of credit reports and other services to financial institutions in the year under review. In view of the Bank

of Ghana's data submission requirements, all credit bureaus receive the same number and type of data from financial institutions. The difference in their services therefore relates to their ability to provide credit reports that meet the needs of lenders. This section of the report discusses how the total number of enquiries conducted by financial institutions are distributed among the three licensed credit bureaus.

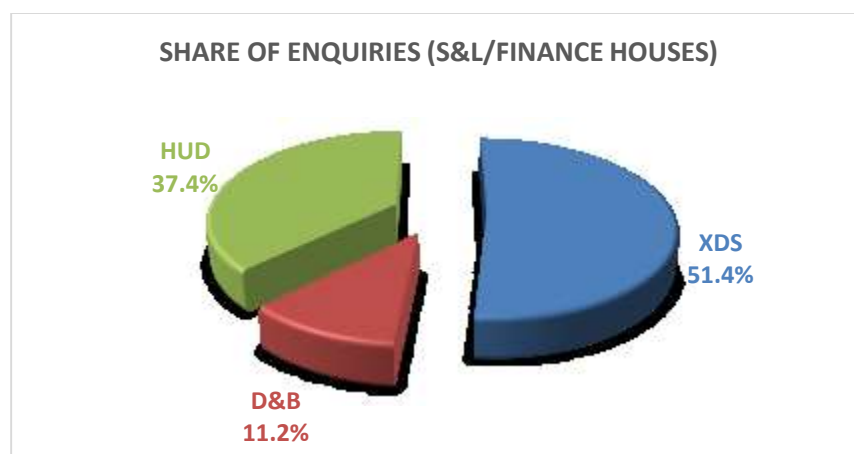
A review of the total enquiries conducted by the universal banks indicated that 51% were done on the database of XDS Data Ghana Limited (XDS) whilst 49% were conducted on the database of Dun & Bradstreet Credit Bureau Limited (D&B).

*Chart C: Share of Enquiries - Banks*

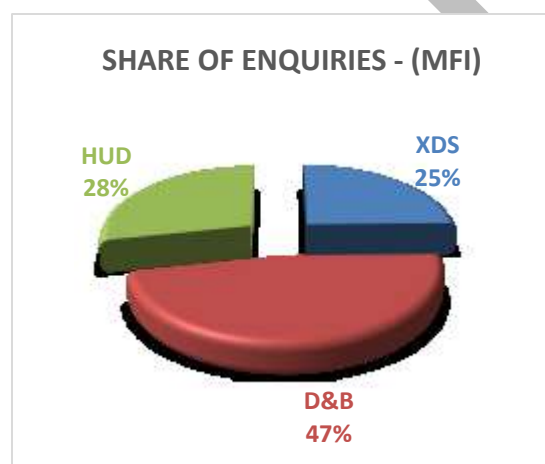


Whilst no Bank conducted searches on the database of HudsonPrice Data Solutions Limited (HUD), about 37.4% of enquiries conducted by Savings and Loans companies and Finance Houses were on the database of HudsonPrice.

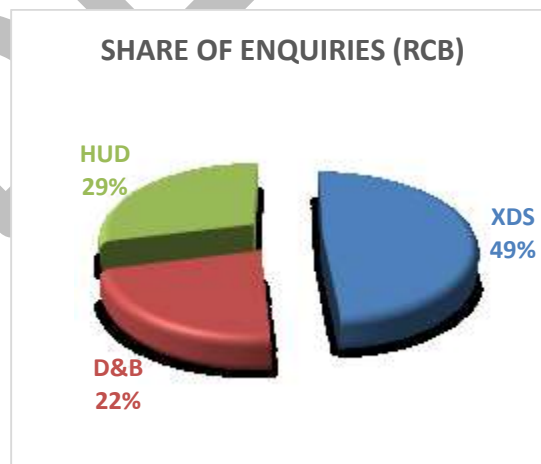
*Chart D: Credit Bureaus Share of S&Ls & FH Enquiries*



XDS Data Ghana Limited (XDS) maintained more than 50% of all enquiries conducted by Savings and Loans Companies and 49% of enquiries done by Rural and Community Banks.



**Chart E: Credit Bureaus Share of MFI Enquiries**



**Chart F: Credit Bureaus Share of RCB Enquiries**

Enquiries conducted by the Microfinance Companies were largely done on the database of Dun and Bradstreet Credit Bureau Limited with 47% of the total enquiries.

## 5. Data Submission

There was a significant drop in the average number of records submitted to credit bureaus on monthly basis in 2019. While an average of 2,719,281 records of data were submitted to credit bureaus in 2018 on a monthly basis, a reduced number of **1,943,416** records were submitted in the year under review by all financial institutions.

The average total number of records submitted by banks on a monthly basis reduced by 47% in 2019. The reduction in records suggest that either a significant number of loan records from 2018 were paid off or banks reduced the number of new loans advanced to both business and individuals in 2019.

The reduction in records submitted by the SDIs were as a result of the collapse of some SDIs in the year under review. Loan data relating to customers of such institutions domiciled at the Receiver were yet to be submitted to the credit bureaus as at December 2019.

Tables G and H show the average monthly submissions of Individual and corporate data by all subsectors:

*Table G: Average Monthly Data submissions – Individual Loan Data*

	2019	2018	2017	2016
Banks	<b>577,084</b>	1,087,630	751,501	600,543
NBFI	<b>1,046,893</b>	1,224,790	742,657	727,983
Rural Banks	<b>182,196</b>	145,473	88,414	40,016
Microfinance	<b>137,242</b>	261,389	38,665	23,392
Average TOTAL	<b>1,943,416</b>	2,719,281	1,621,238	1,391,934

Rural and Community Banks and Microfinance Companies however recorded an increase in the number of individual customer loan records submitted to credit bureaus. This is an improvement over previous year's performance.

*Table H: Average Monthly Data submissions – Corporate Loan Data*

	2019	2018	2017	2016
Banks	<b>43,236</b>	68,169	37,332	37,446
NBFI	<b>9,077</b>	20,659	25,771	8240
Rural Banks	<b>25,213</b>	2,999	1,170	344
Microfinance	<b>21,175</b>	10,392	1,439	307
Average TOTAL	<b>98,701</b>	102,219	65,712	46,336

Data submitted to credit bureaus on corporate customers of financial institutions also reduced by 3% compared to 2018 monthly submissions. This reduction could have been worse but for the significant increase of 740% of business customer records submitted on monthly basis by the rural banks.

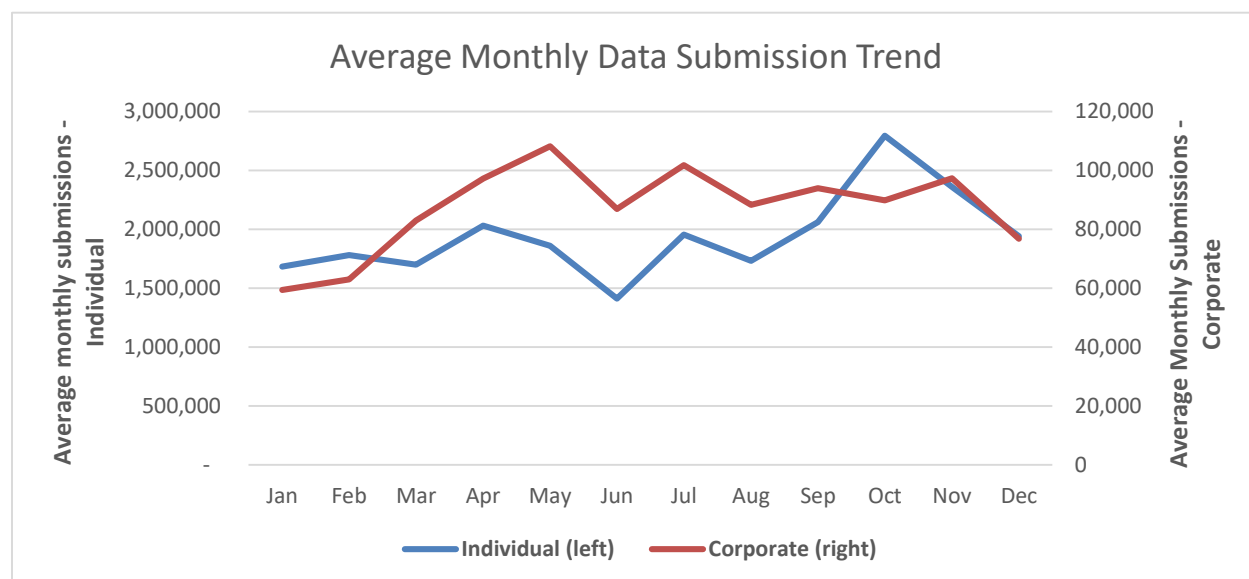
### **5.1 Consistency of data submission**

Data submitted to credit bureaus on a monthly basis increased, consistent with previous years. It is expected on a normal basis that credit records submitted to credit bureaus would follow one of the following trends:

- An increasing trend denoting an increase in new loans with less pay offs
- Reducing trend denoting more pay off and less new loans or
- Minimal fluctuations across months denoting random increase or decrease in new loans and pay offs.

Chart G below depicts the monthly submission trend in 2019. Records on business customers conformed to our expectation with minimal variations on month-on-month basis.

*Chart G: Variations in Monthly Data Submissions*



Inconsistent data submission has a potential of affecting the quality of credit bureaus and creates disputes.

## **5.2 Submission of Dud Cheques**

The Credit Reporting Act, 2007 (ACT 726) requires financial institutions to submit to credit reference bureaus, data on dud cheques<sup>4</sup> issued by customers of financial institutions.

The Total number of dud cheques submitted by Banks to credit bureaus as at December 2019 stood at 38,905 representing 36% increase from December 2018 position of 28,652 shown in the table below.

<sup>4</sup> Dishonoured cheques due to insufficient funds in drawers' accounts



*Table I: Yearly distribution of Dud Cheques*

Year	2019	2018	2017	2016	2015
Total Number of Dud Cheques	38,905	28,652	29,334	55,665	21,153

Out of the total number of dud cheque records submitted by financial institutions, 23,378 were issued by individual customers and the remaining 15527 issued by corporate customers of financial institutions.

Records of dud cheques are displayed on the credit reports of the respective issuers.

## **7. Credit Bureau Data Statistics**

As at December 2019, the total number of records in the database of credit bureaus stood at 23,022,698. This includes both credit and non-credit information with 22,305,962 individual records and 716,736 corporate records.

The non-credit information includes information in the public domain, ID information and company data and others. Credit information in the credit bureau database are presented in the table below:

*Table I: Credit Information in Credit Bureau Database*

Credit Information	
Total No of Consumer Records(Credit)	8,239,801
Total No of Commercial Records(Credit)	429,206
<b>TOTAL</b>	<b>8,669,007</b>

The Credit bureaus recorded a total of **8,669,007** number of records with credit information as at December 2019. This is also made up of **8,239,801** individual credit records and **429,206** corporate credit information.

*Table J: Unique subjects in Credit Bureau Database*

Total Number of Unique Subjects	Number of Records
Individual	4,904,910
Corporate	212,568
TOTAL	<b>5,117,478</b>

There were a total of **5,117,478** unique borrowers in the credit bureau database with Individual borrowers accounting for 96% of total borrowers. This represent an average of two (2) facilities per unique borrower.

## **6. Self-Enquiries**

The Credit Reporting Act, 2007 (ACT 726) provides data subjects the opportunity of obtaining a free credit report once in a year from credit bureaus. This provision is to ensure that customers of financial institutions are aware of the information contained in their credit reports and to initiate corrections and updates where applicable.

The year under review recorded 284 self-enquiries compared to 235 enquiries in 2018.

*Table K: Trend in Self Enquiries*

	Number of Enquiries	
	2019	2018
Number of Free Reports	130	73
Number of Paid Reports	154	162
<b>Total</b>	<b>284</b>	<b>235</b>

The self-enquiries comprised of 154 paid<sup>5</sup> reports and 130 free reports. A number of the self-enquiries were mainly conducted by customers of financial institutions who had issues with their credit reports and needed to correct them. There were also customers who requested to view their credit reports upon knowing the existence of credit bureaus in the country.

Self-enquiries remain low in spite of the right of borrowers to obtain personal credit reports for free once every year in accordance with Act 726.

## 7. Complaints and Resolutions

A total number of 4,763 complaints and disputes were received by credit bureaus from customers of financial institutions in the year under review. This figure represents an increase of 71% compared to 2,781 complaints in 2018.

*Table L: Trend in Complaints and Disputes*

Year	2019	2018	2017	2016	2015	2014
<b>Number of Complaints</b>	4,763	2,781	1,418	1,280	713	724

<sup>5</sup> These paid reports involved customers who requested for printed copies of their credit report.

This increasing trend is attributable to the increased awareness of credit referencing among the public and also due to the quality of data submitted to credit bureaus by financial institutions.

Most of the recorded disputes were as a result of customers with impaired credit reports occasioned by inaccurate information on the credit reports and who were subsequently refused credit facilities.

## **9. Challenges**

The Credit Referencing System has witnessed a number of improvements since its full implementation in 2010. Nonetheless, the following challenges continue to confront the system and limiting its optimum performance.

### *Poor data quality*

Regardless of the unique template for data submission by all lenders, the submitted data often lacks key information for credit bureau use. For instance some data submitted to credit bureaus lacked critical demographic information such as Identity Information (ID), Date of Birth and residential addresses of borrowers. This affects the quality of credit reports generated by credit bureaus and prolongs the processing time for data by the credit bureaus as a lot of effort is put into sanitizing data before processing.

The Bank of Ghana in an effort to curb this challenge has begun its enforcement action on breaches of data submission requirements. It is therefore anticipated that data providers would adhere strictly to the data requirements of credit bureaus.

### *Inconsistent Data Submission*

Data providers are required to update the credit information of customers on a monthly basis with the credit bureaus in the acceptable format. It has been observed that due to lack of consistent data submission, a number of records mostly paid off facilities are not updated, resulting in disputes and inaccurate credit reports.

### *Low usage of credit reports*

It has been observed that not all financial institutions, especially RCBs and MFIs are subscribed to credit bureau services. This is contrary to the provision of Section 26 of the Credit Reporting Act, 2007 (ACT 726) which mandates all financial institutions to obtain credit reports on all prospective borrowers prior to granting or refusing a credit facility application.

The low usage of credit reports also emanates from the lack of understanding by financial institutions on the use of credit reports. For instance some financial institutions, especially rural banks, conduct credit searches only on their commercial customers or first time borrowers, or once on regular customers.

The Bank of Ghana through the Credit Reporting Regulations seeks to mitigate this by administering penalties for breaches.

## **10. Way Forward**

In order to address the challenges and improve credit information sharing system, the following measures have been taken:

- a) The Bank of Ghana has strengthened its surveillance on financial institutions and credit bureaus to ensure that institutions which violate the Credit

Reporting Act, 2007 (Act 726) the Credit Reporting Regulations, 2020 (LI 2394) and BoG directives are sanctioned to serve as deterrent to others.

- b) The Bank of Ghana has begun a process of engaging lenders outside the banking sector with the aim of sharing their credit information with the banking sector through the Credit Referencing System.
- c) Financial institutions and credit bureaus are expected to conduct regular training for data providers to address data quality challenges.

The Bank will engage in public education and awareness programmes with the other stakeholders to ensure that consumers and financial institutions are fully aware of their rights and responsibilities under the Credit Reporting Act, 2007 (Act 726) the Credit Reporting Regulations, 2020 (LI 2394).

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