



# **UPDATED GUIDELINES FOR INWARD REMITTANCE SERVICES BY PAYMENT SERVICE PROVIDERS**

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**Bank of Ghana**  
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## **1.0 Background**

Remittance is a significant source of external financing and a major contributor to national income. Many Ghanaian families depend on remittances from relations living abroad to cater for various expenses including education, health, rent, housekeeping, and utilities. Ghanaians in the diaspora also send money home to fund the construction of residential and/or commercial buildings. Remittances therefore contribute to the economic well-being of Ghanaians.

Over the years, Money Transfer Operators (MTOs) and banking agents have facilitated funds transfer from abroad to beneficiaries in Ghana, which are accessed largely through banking halls. Mobile money and other digital channels which have been made available by non-bank payment service providers are now providing extensive, affordable, convenient, and flexible alternative means for accessing remittances by beneficiaries.

In furtherance of its commitment to creating an enabling environment for remittance without risking the stability of the financial system, the Bank of Ghana publishes this Guideline for payment service providers that intend to partner with MTOs to terminate inward remittances.

## **2.0 Preamble**

Pursuant to Section 4 (1) (e) of the Bank of Ghana Act 2002, (Act 612) as amended, Section 2 (3) of the Foreign Exchange Act, 2006 (Act 723) and Section 101(2) (i) of the Payment Systems and Services Act 2019(Act 987), the Bank of Ghana hereby issues these Guidelines for the regulation of inward

money transfers services provided by payment service providers in partnership with MTOs.

### **3.0 Scope and Applicability**

These Guidelines cover inward international remittance services provided by payment service providers in partnership with MTOs that are terminated into beneficiaries' bank accounts, mobile money wallets and any other electronic account or wallet approved by the Bank of Ghana, and applies to the following entities:

- a) Dedicated Electronic Money Issuers (DEMI)
- b) Enhanced Payment Service Providers (EPSP)

### **4.0 Objectives**

These Guidelines seek to:

- a) provide a framework to guide DEMI and EPSP in partnering with MTOs to deliver inward remittance services to Beneficiaries;
- b) stipulate the minimum standards and requirements for providing inward remittance services;
- c) provide competitive market conditions for the inward remittance industry through the use of innovative digital payment channels;
- d) ensure adherence to Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) and proliferation of weapons of mass destructions Law and Guidelines; and
- e) promote compliance with consumer protection and recourse mechanisms.

## 5.0 Application for Inward Remittance Services

A DEMI or an EPSP regulated under the Payment Systems and Services Act, 2019 (Act 987) may make an application for the provision of inward remittance services:

The application to partner with an MTO to provide inward remittance services shall be made to the Head of the FinTech and Innovation Office of the Bank of Ghana and shall be accompanied by the following information:

- (a) a copy of the board resolution to provide inward remittance services in partnership with the named MTO;
- (b) name, registered address and principal location of the MTO with whom the money transfer service will be conducted;
- (c) details of the operation of the partner MTO;
- (d) notarized copy of regulatory approval of the partner MTO;
- (e) service Level Agreement with the MTO;
- (f) settlement Bank Agreement consistent with the requirements in Foreign Exchange Act, 2006 (Act 723);
- (g) service design, including end-to-end transaction flows involving all parties;
- (h) AML/CFT policies ;
- (i) service risk management framework; and
- (j) evidence of implemented transaction monitoring and fraud reporting tools.

The Bank of Ghana may, within ninety (90) days following receipt of a complete application or where further information has been required, after receipt of the information, grant or refuse the application.

## **6.0 Eligible Money Transfer Operators**

**6.1** A DEMI or EPSP which seeks to partner an MTO for the provision of inward remittance services shall ensure that the partner MTO(s);

a) is a registered entity and licensed by a competent authority in its country of registration to carry out international money transfer services;

i. where the MTO operates a remittance hub or aggregator model, a DEMI or EPSP shall terminate traffic only from the country where the MTO is licensed and the same has been submitted and approved by the Bank of Ghana;

ii. A DEMI or EPSP can however submit an application to the Bank of Ghana to partner an MTO which operates a remittance hub or aggregator model for approval by submitting all the regulatory requirements as stated in section 6 subsection (b) to (e) for each of the entities that participates in the hub or aggregation;

b) has no findings involving illegal, inappropriate business practices or any other adverse finding against it;

c) country of registration and issuance of license shall be one which implements and enforces AML/CFT frameworks in line with FATF recommendations and must not have come under adverse findings from peer review assessment or cited for AML/CFT infringements; and

d) is well established in international money transfer business with a track record of operations in well regulated markets.

**6.2** For the avoidance of doubt, A DEMI or EPSP is not permitted to terminate inward remittances from MTOs that routes traffic from any other country other

than its country of origin where it is licensed to operate money transfer services. Sections 6.0 (b), (c), (d) and (e) remain unchanged.

## **7.0 Settlement account**

7.1 (a) A DEMI or EPSP shall have a local designated account for remittance settlement domiciled with a universal bank(s) only;

(b) A DEMI or EPSP shall have up to a maximum of three (3) partner banks for purposes of inward remittances terminations;

(c) A DEMI or EPSP should ensure that their partner MTOs credit the nostro account of their partner banks directly for all remittances. A DEMI or EPSP should indicate to the Bank of Ghana, their partner bank who will receive such remittance flow for onward credit into the cedi settlement account. All funds terminated should be reconciled and matched within 72 hours;

(d) The accounts in (a) above shall be operationally distinct from all other accounts held by the DEMI or EPSP.

7.2 (a) All disbursements shall be from the Local Settlement Account

(b) The Local Settlement Account shall only be funded from the Remittance Inflow account except where the DEMI or EPSP has entered into a funding arrangement with the settlement bank for the purpose of disbursement to beneficiaries. The repayment of the facility shall be from the Local Settlement Account upon liquidating funds from the Remittance Inflow Settlement Account.

(c) In the event of insolvency or liquidation of an MTO prior to the repayment of the facility, the DEMI or EPSP may repay the facility from alternative sources into the Local Settlement Account.

7.3 The settlement bank shall:

- a) Use the Opening Bloomberg USDGHS Regional (REGN) bid or the corresponding Currency Pair Rate on the day the transfer is received or as prescribed by Bank of Ghana for the same day conversion of settlement funds into local currency;
- b) Credit the local settlement account of the DEMI or EPSPS with the Ghana Cedi equivalent of inward remittances payable to beneficiaries within twenty-four (24) hours;
- c) subject to 7.1 (c) above, ensure that funds in the settlement accounts are used solely for payment to beneficiaries;
- d) not honour any request other than for payment to beneficiaries and report any violation or suspected violation to the Bank of Ghana; and
- e) ensure that all AML/CFT requirements are satisfied for all settlement accounts regarding inflows and outflows

## **8.0 Compliance requirements**

DEMI and EPSPs providing inward remittance services in partnership with MTOs shall comply with the following:

### **8.1 Reporting**

Submit an electronic monthly data return by the **5<sup>th</sup> working day of the ensuing month** to the Bank of Ghana in the form set out in Annex-2 (Inward Remittance Reporting Template – Wallet and Bank Account Termination).



## **8.2 Training, Documentation and Controls**

- 8.2.1 Develop a compliance manual which shall include procedures for monitoring and detecting suspicious transactions and ensure that dedicated staff are adequately trained and familiar with these procedures; and
- 8.2.2 Establish internal controls for ensuring compliance with operating terms and conditions.

## **8.3 Anti-Money Laundering and Counter Financing of Terrorism (AML/CFT)**

Implement an AML/CFT compliance program that is proportionate to the risk, size, and nature of the remittance business and in line with the Anti-money Laundering Act 2008 (Act 749) as amended by the Anti-Money Laundering (Amendment) Act, 2014 (Act 874).

## **8.4 Consumer Protection**

Implement consumer protection and recourse mechanism to address challenges of beneficiaries of remittances in line with Bank of Ghana's Consumer Recourse Mechanism Guidelines for Financial Service Providers.

## **8.5 Records Management**

Collect and maintain accurate information, on each transaction processed, for a period not less than six (6) years. Information collected shall include:

- i. Name of sender and receiver per transaction;
- ii. Address of receiver (P.O. Box, physical or digital address);
- iii. Contact number of sender and receiver;
- iv. Country of origin;
- v. Gender (Male/Female) of receiver;
- vi. Purpose of transfer;
- vii. Date of transfer ;
- viii. Amount transferred (USD/GBP/EUR and any other foreign currency);

- ix. Amount paid out to recipient in Ghana (GHS); and
- x. Any other information required by the Bank.

## **8.6 Data Protection**

Partner MTOs shall collect, process and retain remittance data in line with relevant provisions under the Data Protection Act 2012, (Act 843).

## **9.0 Sanctions and Penalties**

Any action which contravenes any section of this Guideline shall attract the corresponding sanctions and penalties under the relevant laws.

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## Annex-1

### Definition of Terms

“**Beneficiary**” means a person or entity in Ghana to whom a remittance payment order is being sent from a foreign jurisdiction.

“**Dedicated Electronic Money Issuer**” means a body corporate that has been licensed under section 24 of the Payment Systems and Services Act 2019 (Act 987) to issue electronic money.

“**Enhanced Payment Service Provider**” means a payment service provider permitted to provide payment services including inward international remittance services per **NOTICE NO. BG/GOV/SEC/2020/07**.

“**Inflow**” means inward international remittances terminated into the settlement accounts.

“**Inward Remittance**” means the transfer of funds or money by a party in a foreign jurisdiction to a person or an entity in Ghana.

“**Local Settlement Account**” means an account credited with the Ghana cedi equivalent of inward remittances payable to beneficiaries at the Opening Bloomberg USDGHS Regional (REGN) bid or the corresponding Currency Pair Rate on the day the transfer is received or as prescribed by Bank of Ghana for the same day conversion of settlement funds into local currency.

“**Money Transfer Operator**” means a financial service provider that facilitates funds transfer across national boundaries.

“**Outflow**” means the movement of inward international remittances from the Inflow settlement accounts to the Local Settlement Account or Operational Account of the DEMI or EPSP.

**“Payment Services Provider”** means a body corporate licensed and authorised under the Payment Systems and Services Act, 2019 (Act 987) to provide payment service.

**“Remittance Inflow Settlement Account”** means a Local Ghana Cedis Account into which inward remittances from MTOs are primarily credited.

**“Settlement Bank”** means a universal bank which holds designated accounts on behalf of a DEMI or EPSP for the purpose of remittance settlements.

**“Complete Application”** means the submission of all required documents needed to process an application for authorisation or licensing.

**“Payment Service”** means the provision of service to facilitate transfer of funds from a payer to a payee using various forms of payments instruments or electronic money.

## **Annex 2 Reporting Template – Wallet and Bank Account Termination**

Inward Remittance Reporting Template for Wallet and Bank Account Terminations shall be communicated to authorized Payment Service Providers (PSPs) upon approval to submit regulatory returns.

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