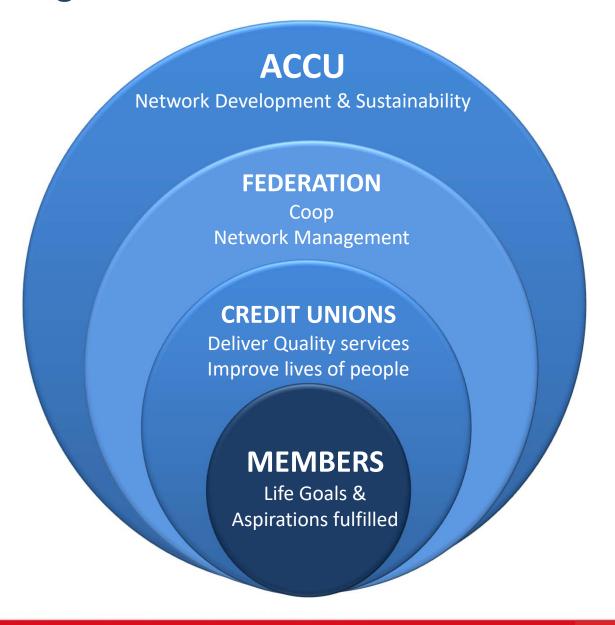
# **Network Governance**

In-house Security Mechanisms:
Stabilization Fund &
Risk Based Supervision
by the Federation



#### **Vision: Integrated & Sustainable Credit Union Networks**



#### **Panelists**

Mr Navindra Linayarachchi CEO – SANASA Federation

Mr Mohammad Ali Jinnah Vice Chairman – Co-operative Credit Union League of Bangladesh

Ms Emma dela Cerna CEO – Philippine Federation of Credit Co-operatives

Mr Thac Tam Nguyen

Deputy CEO – Co-operative Bank of Vietnam

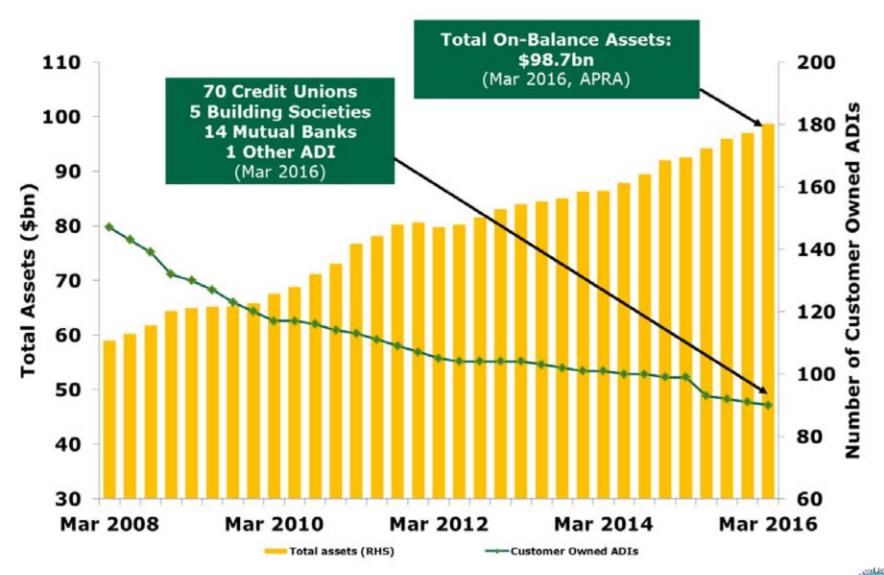




Countr	y Members	Number of CUs	Individual Members	Ave no of members	Assets
Sri Lanka	SANASA	8,424	945,903	112	74
Vietnam	CBV	1,146	1,742,506	1,521	2,610
Philippines	PFCCO	728	2,189,250	3,007	426
Bangladesh	CCULB	723	435,031	602	189



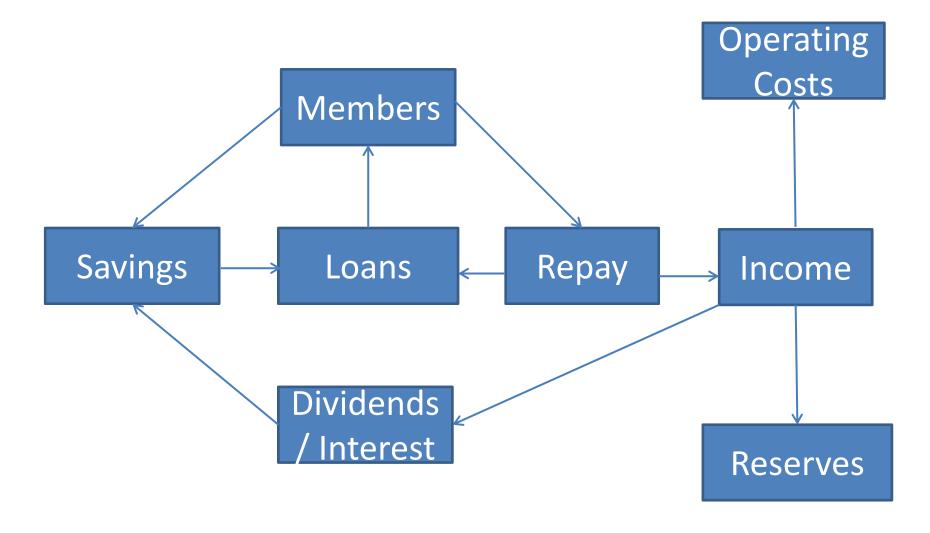








#### How a credit union operates



#### The effects of a credit union failure

Reputation and Contagion Risk

The main reasons for credit union failure are:

Delinquent loans

Uncontrolled expenses / mismanagement

Corruption / internal fraud



#### The effects of a credit union failure



The failure of an individual credit union can reflect on the whole network – this is called contagion risk

It is in the network's interest to protect reputation by ensuring that individual credit unions do not fail

Integration protects participants in the network





#### How do we integrate a credit union network?

Criteria	Cycle of Evolution
1. Co-operating Sharing resources	Simple – solidarity put in action
2. Standardization of operations	Compromises is important
3. Contractual solidarity	Form something new
4. Governance and self-discipline	Maturity

#### **Sharing resources**

Co-operating through services provided by Federation:

Centralised liquidity management
Standardised forms / marketing material
Self regulation & reporting
Representations to government
Legal and compliance advice
Centralised payments
Self regulation (stabilisation fund)





#### **Standardisation of operations**

Lending

Collections & delinquency control

Financial objectives

Accounting standards

Budgeting

**Operational Controls** 

Reporting



STANDARDS
OF
OPERATION
MANUAL

HE NEW SOUTH WALES CREDIT UNION SAVINGS RESERVE BOARD





#### **Contractual solidarity**

Credit Union Financial Support System (Australia)

Provides emergency financial support for participants

Legally binding agreement to contribute

# CREDIT UNION FINANCIAL SUPPORT SYSTEM LIMITED

ABN 24 088 097 563

#### INDUSTRY SUPPORT CONTRACT

#### Purpose of the industry support system

Cuscal, CUFSS and any CUFSS Member that executed this Industry Support Contract, are participants in the industry support system. CUFSS may, in its discretion, offer a new CUFSS Member to enter into this Industry Support Contract and upon such offer and execution; the new CUFSS Member will become a participant in the industry support system.

The purpose of the industry support system is to:

- (a) Protect the interests of members of participating CUFSS Members; and
- (b) Promote financial sector stability;

by:

- (c) Enabling CUFSS Members to manage their liquidity requirements through Cuscal banking services or other CUFSS approved ADI banking arrangements; and
- (d) Giving CUFSS Members access to financial support where Cuscal or a CUFSS approved ADI is unable to meet their liquidity requirements.

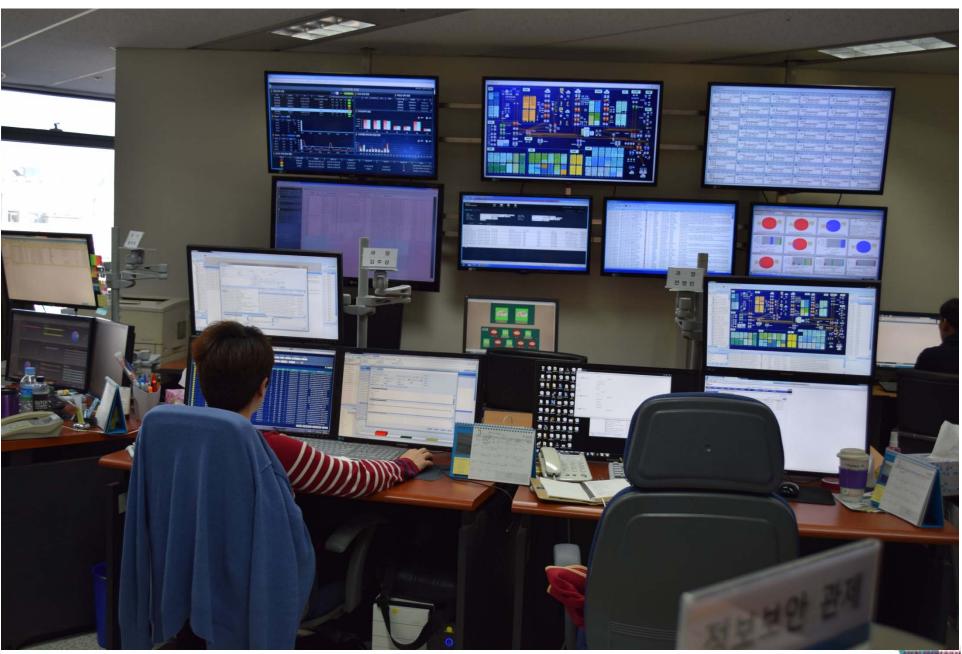
**CUFSS** has been set up to protect the interests of members of participating **CUFSS Members** and promote financial stability by providing a first tier level of emergency financial support for **CUFSS Members**. Generally, **CUFSS** aim is to work together with **CUFSS Members** to identify areas of risk and distress and to take a cooperative approach to eliminating those risks.





# Integrated network governance Integration challenges

Criteria	Cycle of Evolution
1. Sharing resources (pooling)	Simple – solidarity put in action –
2. Standardization of operations	Compromises is important.
3. Contractual solidarity	Form something new
4. Governance and self-	Maturity
discipline	- Stabilization Fund & Risk Based supervision





#### **HOW DOES A STABILIZATION FUND WORK?**



A Credit Union has its own Reserves fund



The Credit Union Network has Stabilization Fund





#### **How a Stabilisation Fund Works**

#### Participants must:

- Contractually agree to co-operate
- Adhere to minimum standards of operation
- Maintain adequate reserve ratio
- Agree to pay a percentage of assets (0.01% in NACUFOK) for the running of the fund
- Agree to standardised reporting to the fund administrator (federation) and/or regulator





## Then, if a credit union experiences difficulty...

For example: a credit union financial statement with:

2016 losses: 35,000

CU reserves 2016: 15,000

Insolvency: credit union needs 20,000

To keep the credit union solvent, the stabilisation fund may provide 20,000 – conditional upon:

- Immediate remedial action
- Removal of management/board?
- Appointment of administrator?



#### **Credit Union Operations**

Credit union must identify reasons for losses

- Loans losses
- Uncontrolled expenses (which ones)
- Insufficient income (how to increase)
- Fraud / corruption / mismanagement (where, why, others)

Credit union must identify and make sure that appropriate measures for redress are implemented

Stabilisation fund may appoint administrator, may even force a merger with a stronger credit union in order to protect the reputation of the network

#### **Objectives of Stabilisation Fund**

To prevent the failure of an individual credit union To maintain confidence by keeping the number of financially weak credit unions as low as possible by:

- Applying consistent standards of operations
- Monitoring and supervising CU activities (offsite and onsite)
- Connecting different organizations in the network to improve each credit union's financial safety



#### **Supervisory Approaches**

#### Compliance based

Compliance with legislation and regulations and to ensure financial statements meet the requirements of reporting methodology (IFRS)

#### Risk based

Translating economic and other information into potential risk factors for a CU. Focuses on quality of risk management systems and the recognition of systemic risks to the credit union system





## **Voluntary**

or

## **Compulsory?**









# Issues Debate Resolve **ACT**





#### **HOW DOES A STABILIZATION FUND WORK?**



A Credit Union has its own Reserves fund



The Credit Union Network has Stabilization Fund





#### Questions prepared by Mark Worthington

In your country, who is responsible for supervision of credit unions?

What do you see as the advantages of supervision?

Can you give an example of reputation/contagion risk?

Do you have a stabilization fund? Who runs it?

Can you explain how the regulatory body monitors and supervises credit unions in your country

Has the regulatory body had to intervene in a poorly performing credit union in your country?

Have you had a recent CU failure in your country?

What is the effect of a failure on the rest of the credit union network in your country?

Should a stabilization fund be voluntary or compulsory?

What happens to CUs that do not join the stabilization fund?

Should there be government representatives on the board as well as CU appointees?

What about moral hazard? (ie the lack of incentive to guard against failure when one is protected from its consequences, e.g. by stabilization fund)

NACUFOK has set contributions at 0.01% of assets, in Aust was up to 0.50% of assets - what would be an acceptable level of stabilization fund contribution?





#### **Draft Resolutions**

That each ACCU member country's registrar of primary societies make local federation membership compulsory

That each federation that benefits from compulsory membership provide representation, marketing and other services, and monitoring and supervisory assistance to all primary societies

That each federation be required to set up a stabilisation fund with a board elected by the primary societies