



Welcome to Issue 14 of Credit Union News. For this first edition of 2021 we focus on our key priorities for credit unions in 2021.

Issue 14  
March 2021

### **The Environment remains Uncertain and Challenging**

A year into the COVID-19 pandemic, the economic outlook remains uncertain with the full impact of the shock to the economy and financial system yet to fully unfold. The pandemic has accentuated commercial challenges facing credit unions, leading to a growing gap between savings and loans across the sector.

As we move through 2021, credit unions need to focus on their own future sustainability, by addressing the real commercial challenges they face.

### **2021 Priorities**

Our key priorities in relation to credit unions for 2021 include:

- Strengthening core foundations in credit unions, particularly governance and risk management;
- Supporting the identification, development and delivery of sustainable transfers, and engaging on business model change proposals and innovation
- Implementing the proportionate regulatory framework for credit unions, following extensive changes concerning credit union lending and investment.

These priorities are explored in more detail in my recent [speech to the CUMA](#) Spring conference which focuses on the role of risk management in sector restructuring and business model change. I would also encourage you to read a recent speech by Central Bank Deputy Governor Ed Sibley to the Institute of Directors, entitled: [“Governance and risk in a time of uncertainty and change”](#)

### **Strengthening Core Foundations**

Strengthening core foundations remains a key focus of our supervisory strategy. Our 2021 supervisory engagement will include a thematic review of risk management, in particular to assess its overall embeddedness. Greater ownership by boards of risk management is critical to managing through the disruptive change associated with restructuring and business model innovation, both of which have an important role to play in sector sustainability.

### **Sector Restructuring**

The sector continues to go through a process of restructuring which provides strategic transfer solutions for weaker credit unions, enabling affected members to gain access to a wider range of services provided by stronger, larger credit unions. It also offers growth opportunities to build scale for larger credit unions.

### **Regulatory Development**

Following the extensive changes introduced to the regulatory framework for credit unions in recent years, our focus in 2021 is on the effective implementation of the regulatory framework to support credit unions in utilising available capacity and existing flexibility to develop their business model and address the commercial challenges they face. This will include ongoing processing of regulatory approvals including MPCAS and any other additional services, and processing of applications for the 15 per cent combined lending limit for house and business loans (further information on this process is available on page 3).

Patrick Casey  
Registrar of Credit Unions



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## Credit Union Regulations - Amendments

The Credit Union Act 1997 (Regulatory Requirements) (Amendment) Regulations 2020 (the Amending Regulations) were made on 22 December 2020 and took effect immediately.

The Amending Regulations, which amend the Credit Union Act 1997 (Regulatory Requirements) Regulations 2016 (the 2016 Regulations), were made in the context of ensuring that regulations applicable to credit unions remain fit for purpose and proportionate. Changes to the investment and liquidity regulations were made, primarily arising from:

- Expiry of the Brexit transition period during which the UK remained subject to EU rules and remained a member of the single market and customs union; and
- Introduction by the ECB in 2019 of a two-tier system for remunerating excess liquidity holdings in the reserve deposit account at the Central Bank.

The changes which were made followed engagement with key stakeholders, and included a statutory consultation process in line with section 84A of the Credit Union Act, 1997. The main changes include the following:

- Transitional arrangements for investments, arising from Brexit, whereby credit unions are permitted to continue to hold existing fixed term investments in UK credit institutions until maturity (and for up to two years for other investments in UK credit institutions) in the event that UK authorised credit institutions are no longer authorised as such under CRD.
- Changes to the definition of “*relevant liquid assets*” to formally clarify that balances in the minimum reserve account in excess of the ECB minimum reserve requirement come within the definition of “*relevant liquid assets*”; and
- A small extension for technical reasons to the permitted maturity limit for Irish and EEA State Securities and supranational bonds to 10 years and 6 months.

The Amending Regulations are available on our website – see [here](#). The Central Bank will update the relevant chapters of the Credit Union Handbook and the unofficial consolidated version of the 2016 Regulations. The updated documents will be published on our website in due course.

## Prudential Return Reporting Update

### Investments in UK credit institutions

Please note that, from the March 2021 Prudential Return on, investments in UK credit institutions (not authorised as such pursuant to the Capital Requirements Directive) availing of the above-mentioned transitional arrangements should be reported in the “*Other €*” column of the “*Investments by Duration*” table and in the “*Investments outside the list of authorised investments for credit unions*” table in the quarterly prudential return.

Credit unions are required to report on investments available in less than eight days and in less than three months in the Liquidity table in the Investments section of the Prudential Return. Where credit unions hold investments (including bank bonds) in UK credit institutions in accordance with the transitional arrangements, these continue to come within the meaning of “*relevant liquid assets*” and should continue to be reported in the relevant row of the Liquidity table.

### Excess funds held in the Minimum Reserve Account

For funds held in the minimum reserve deposit account in excess of the Minimum Reserve Requirement, the credit union should continue to report these excess funds in the same manner it reported them on the September 2020 Prudential Return and December 2020 Prudential Return, i.e. as set out in the Registry’s email to all credit unions dated 5 December 2019 and in [Issue 12](#) of Credit Union News (March 2020). While such excess funds held in accordance with Regulation 7(1A) of the 2016 Regulations now qualify as “*relevant liquid assets*” under the 2016 Regulations, the Central Bank does not consider funds held in the minimum reserve deposit account to be part of a credit union’s investment portfolio and it is therefore not appropriate to include these excess funds in the Liquidity table in the Investments section of the Prudential Return. In assessing the liquidity position of a credit union, the Central Bank will, in accordance with the 2016 Regulations, include any funds that a credit union holds in the minimum reserve deposit account in excess of the minimum reserve requirement in its calculation of a credit union’s liquidity position.



## Application Process for the 15% Combined Concentration Limit for House and Business Lending

The changes to the 2016 Regulations introduced three new combined concentration limits, on a tiered basis, for house and business loans, expressed as a percentage of total assets. Within these tiered limits, credit unions that have total assets of at least €100 million for two or more consecutive quarters immediately preceding an application may apply to the Central Bank for a 15% combined concentration limit for house and business lending (the 15% Limit).

In May last year, following engagement with credit union representative bodies, the Central Bank published the application form and an associated guidance note on the application process and application form for the 15% Limit. These documents are available on the Central Bank's [website](#).

The guidance note sets out details on the application process and how the Central Bank will assess a credit union's application. It also gives guidance on the information and detail the Central Bank expects credit union applicants to provide in, and with, a completed application form.

Before making an application, a credit union must meet the asset size criterion - minimum total assets of at least €100 million. It should be noted that, while a credit union that has availed of the 10% limit (through the notification process in place) is required to maintain minimum regulatory reserves of 12.5% to avail of that limit, this specific regulatory reserves criterion does not apply in respect of the 15% limit. The application process will include consideration of regulatory reserves as part of the specific assessment process.

There are two formal stages in the 15% Limit application process:

- **Stage 1:** Submission of Completed Application and Application Assessment; and
- **Stage 2:** Approval/Refusal.

The Central Bank is supportive of credit unions engaging prudently in house and business lending as part of a balanced loan portfolio. The provision of house loans and business loans is more complex than shorter term personal lending which to date, generally, has been the credit union sector's core credit offering. House and business lending activities present different risk, income and profitability profiles. Where credit unions wish to undertake increased house and business lending, it is important that they understand the risks involved. Please see [here](#) for guidance on Long Term Lending.

## Operational & Security Risk Report

Regulation 118(3) of the European Union (Payment Services) Regulations 2018 (the Regulations) states that a payment service provider shall provide to the Bank on an annual basis, or at shorter intervals as determined by the Bank, an updated and comprehensive assessment of:

- the operational and security risks relating to the payment services provided by the payment service provider; and
- the adequacy of the mitigation measures and control mechanisms implemented in response to those risks.

Credit unions are reminded that they are required to complete an Operational and Security Risk Reporting Template (which can be found [here](#)) and submit it to the Central Bank via the Online Reporting System (ONR). The reporting date for the annual assessment for credit unions is 30 September 2020 and the assessment must be submitted to the Central Bank by 31 March 2021.

If credit unions have specific queries regarding this return they should contact their supervisor in the first instance.



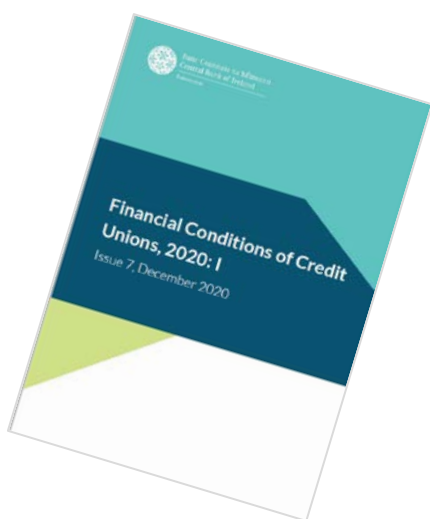


## Financial Conditions

The [seventh edition of the Financial Conditions of Credit Unions Report](#) was published on 17 December. This report provides an update on the financial performance and position of credit unions, to inform credit unions and provide input for boards as they undertake their own strategic analysis and decision making. It is primarily based on data over the 5 year period 30 September 2015 to 30 September 2020.

For credit unions, like other parts of the financial system, 2020 was a challenging year, both operationally and financially. However, credit unions have been effective in maintaining continuity of services for their members. Credit unions came into this crisis with a strong reserves and liquidity position. Across the sector, reserve and liquidity levels have remained relatively stable so far during the pandemic period. Notwithstanding this, data presented in the report highlights a continuation of the sustainability challenges facing many credit unions across the sector.

One of the most striking features of the trends in 2020 is the growing gap between savings and loans. Key challenges for credit unions include growing lending, the principal driver of overall income generation, to keep pace with savings inflows, continued low investment returns given the current interest rate environment and high operating costs relative to income. Credit union boards must therefore focus on the business risks that flow from these challenges. Managing savings inflows and lending is a core part of the broader commercial challenge facing credit unions.



## 2020 Information Seminar

In December 2020, the Registry held an Information Seminar for representatives from across the sector to provide updates on recent regulatory policy and supervisory developments. Over 250 attendees participated on a virtual basis. Presentation materials and a recording of the event are now available on the Central Bank [website](#).

The presentations were on the following topics:

- [Supervisory Expectations – Risk Management / Loan Forbearance;](#)
- [2020 Financial Year End;](#)
- [Update on Changes to the Lending Framework \(including risk considerations for credit unions\);](#)
- [Update on Restructuring;](#) and
- [Brexit - Preparedness & Transitional Arrangement for Investments.](#)

This seminar provided an opportunity for the Registry to continue to have the opportunity to engage with credit union directors and management; to provide updates on the Central Bank's regulatory and supervisory work; and to hear credit unions' views on current issues through a Q&A session.





## Targeted Information Requests

As credit unions continue to operate under challenging conditions in the COVID-19 environment, the Registry of Credit Unions acknowledges that credit unions have continued to serve their members' needs and provide a critical service in local communities. We would like to extend our thanks to credit unions for their ongoing constructive engagement and cooperation with Registry supervisors and for the timely provision of targeted information requested.

The COVID-19 pandemic has led to an abrupt and significant deterioration in the macro-financial environment, both in Ireland and internationally. The full effects of the COVID-19 shock still lie ahead and it is clear that uncertainty remains in relation to the macroeconomic outlook. In order to examine the effects of both COVID-19 and Brexit on credit unions, the Registry of Credit Unions issued a number of targeted information requests in 2020 including in key areas of credit, liquidity and investment risk.

Given the evolving COVID-19 environment, the Registry of Credit Unions will continue to require additional targeted information to be submitted by credit unions in key areas in 2021, including operational and financial resilience. While we aim to be measured and pragmatic with these data requests in terms of the type and frequency of requests, recognising the rapidly evolving nature of the situation we are faced with, we expect credit unions to continue to engage constructively with us and respond to such requests in an expedient manner.

Enhanced data and reporting capabilities are essential to facilitate continual assessment of the range of credit union risk considerations. It aligns with the Registry of Credit Union's stated desire to enhance the use of data analytics in supporting effective supervision. It is also an important resource for Boards, as they assess the financial resilience of their credit union, using key performance indicators concerning current and emerging risks.



## Revised arrangements for submission of applications for partial amendment of registered rules

As previously communicated in the previous edition of Credit Union News due to the ongoing situation arising from the COVID-19 pandemic, all applications for a partial amendment of registered rules should be submitted to the Registry of Credit Unions via the "Secure File Upload" facility on the Online Reporting System (instead of the normal postal system).

In order to avoid delays in the processing of rule amendments, please ensure that all of the following documentation is included with such applications:

- An "Application to register a Partial / Complete Amendment of Rules" which must be signed by four members (one of whom shall be the secretary and another director);
- A Statutory Declaration in Support of an Amendment of Rules. This is a statutory declaration that the credit union has satisfied itself that any amendments made to the credit union rules are not contrary to financial services legislation;
- A copy of the completed rule amendment (known as the "O" letter); and
- A complete copy of the new credit union rules to reflect these changes.

Applications will not be processed until all documentation is complete and in order. If you have any specific queries regarding rule amendments, please contact your supervisor or send your query to [rcu@centralbank.ie](mailto:rcu@centralbank.ie).



Section 23 of the Central Bank Reform Act, 2010, states that:

*“A regulated financial service provider shall not offer to appoint a person to perform a pre-approval controlled function unless the Bank has approved in writing the appointment of the person to perform the function.”*

It has come to our attention in recent times that a number of credit unions have permitted individuals to take up a pre-approval controlled function (PCF), in some cases for a number of months, without seeking the appropriate approval from the Central Bank. Credit unions are reminded that this is a contravention of Section 23 as stated above, and is not a practice that the Registry of Credit Unions deems to be acceptable. Further information on the fitness and probity regime for credit unions, including details of ongoing compliance obligations, can be found in the Guidance on Fitness and Probity for Credit Unions document on the Central Bank website.

### Temporary Officers

In certain cases only, Regulation 10 of the 2013 Regulations and Regulation 11 of the 2015 Regulations provide for persons performing PCF roles on a temporary basis. However, the Central Bank expects that such arrangements are only to be used in the most exceptional of circumstances, and must be agreed in writing with the Central Bank in advance of the person in question assuming such responsibility as a temporary officer.

If the function enables the person to exercise a significant influence on the conduct of the affairs of the credit union, even for a relatively short period, it is likely that the Central Bank will require the credit union to progress with the full PCF application process.

Where a credit union wishes to extend for a further period an appointment to exercise a PCF in a temporary capacity, the credit union must obtain the prior agreement in writing of the Central Bank. The credit union should contact a member of the supervisory team assigned to that credit union for that purpose in the first instance.

Further information on temporary arrangements can also be found in the Guidance on Fitness and Probity for Credit Unions document which is available on the Central Bank website.

## Applications for Pre-Approval to all PCF Roles

When submitting an Individual Questionnaire (IQ) to the Central Bank to apply for pre-approval to take up a PCF role, credit unions are reminded to ensure that all relevant information has been provided in the application.

Sections of the IQ which have frequently been found to be lacking in sufficient detail are:

- Section 3 – relevant previous experience (often missing credit union experience);
- Section 7 – savings and loans with the credit union (often missing); and
- Section 12.6 – proposer endorsement (often too short and lacking in sufficient rationale).

Of the 101 IQ applications submitted in 2020, 19 - almost 1 in 5 - were rejected due to insufficient data. Credit unions are reminded that processing delays can arise where insufficient information has been provided. As the submission and processing of the IQ for a proposed Chair must take place within a two-month period prior to the AGM, such delays must be avoided.

### PCF Data Obligations

Credit unions are reminded to keep details of persons holding Pre-approval Controlled Functions (PCFs) up to date, by submitting the following updates through the Central Bank's Online Reporting (ONR) system:

- An effective start date (in the case of a manager, risk management officer, head of internal audit and head of finance);
- Confirmation of election date i.e. the AGM (in the case of a chair);
- Change to residential address;
- Change to contact details;
- Confirmation of an applicant not taking up a role (e.g. where a person approved for the role of chair by the Central Bank is subsequently not elected at the AGM); and
- Resignation details.

Practical operational guides for credit unions on how to submit the above updates are available on the Central Bank website at the following [here](#).

It is important to note that the Annual Return, which requires submission of data relating to the current chair and manager, contains a restriction which only allows selection of the chair/manager whose PCF data indicates that they are currently active in the respective role.

In addition, as the Annual PCF Confirmation Return for credit unions is incorporated into the Annual Return, credit unions should be mindful that declarations signed on this confirmation return relate to current PCF data held on Central Bank systems.

If start and end dates for PCFs have not been updated as appropriate, a credit union runs the risk of not being able to successfully submit the Annual Return with accurate information by the return's due date.





## Nomination of property under Sections 21 and 22 of the Credit Union Act, 1997

In accordance with the above sections of the Credit Union Act, 1997, a member of a credit union who is of or over the age of sixteen may nominate a person or persons to become entitled at their death to the whole, or such part or parts as may be specified in the nomination, of any property in the credit union (whether in savings, loans, insurances or otherwise) which they may have at the time of their death.

Nominations are subject to a number of limitations under Section 21 of the 1997 Act. One such limitation is that for the purpose of the disposal of any property which is the subject of a nomination, if at the date of the nominator's death the amount of his property in the credit union comprised in the nomination exceeds €23,000 the nomination is valid to the extent of €23,000 but not further or otherwise.

The 1997 Act provides that a nomination may be revoked or varied by a subsequent nomination by the credit union member but that a nomination is not revocable or variable by the will of the nominator or by any codicil to their will. In addition, the marriage of a member of a credit union operates as a revocation of any nomination made by them before the marriage. A nomination is also revoked where the nominee pre-deceases the nominator.

Section 22 of the 1997 Act provides that where any member of a credit union has made a nomination under section 21, the board of directors, on receiving satisfactory proof of the death of that member, and if and to the extent that the nomination is valid, must in the case of each person entitled under the nomination either transfer to them or pay them the full value of the property to which they are so entitled.

Given the nature of the requirements of the 1997 Act on the nomination of property, and the legal complexities of probate and succession law, it is recommended that, as part of their risk management and compliance programmes, credit unions should review relevant documentation, website material and literature for members relating to nominations to ensure that it is clear and accurate, is not misleading and brings relevant material information to the attention of members in a way that seeks to inform the member about making or revoking a nomination.

## Central Bank of Ireland Portal

The Central Bank is launching a new IT Platform called the Central Bank of Ireland Portal (*The Portal*) which will simplify how credit unions engage with the Central Bank on a range of services. On 11 February 2021, we issued a communication to all credit unions providing information on what they need to know, what they need to do now and what happens next to help credit unions get ready. Before the end of March 2021, we will send credit unions a communication to coincide with the opening of the Portal registration window. This communication will contain all the information needed to complete registration and set up a Portal Administrator and Portal users.

Upon successful Portal registration, credit unions will be able to:

- View information relating to your credit union;
- Notify the Central Bank of required changes to that information; and
- Communicate with the Central Bank regarding such changes via Portal Messages

If you have any questions, please contact us on [portalsupport@centralbank.ie](mailto:portalsupport@centralbank.ie)





## CEO Forum

In 2018, we initiated a CEO Forum on Business Model Development which facilitated CEO-led collaboration on business model development under the stewardship of a Steering Group of 15 CEOs and an independent chairperson, Professor Donal McKillop. The Forum provides a constructive environment for credit union CEOs to share their views, and foster strategic coherence in describing the business models of the future and describing how they may be best realised.

The group framed its approach to identifying business model development issues using an adapted business model canvas. With support from Chair Professor McKillop, and the Registry, the group designed and carried out a survey of colleague CEOs on their business model development intentions over the next five years. Survey results, circulated to all credit union CEOs, helped the group identify areas for their attention and helped to prioritise these resulting in identification of a number of workstreams for the group.

With the Forum operationalised, in November 2020 the Central Bank formally stood back from its secretariat role. This coincided with the Forum's publication of four papers on workstream deliverables on the Forum's newly launched [website](#) on 1 December:

- Credit Union Collaboration;
- Revolving Credit;
- Member Engagement/ Strategic Marketing; and
- COVID-19 implications.

3 additional papers have been added to the website since its 1 December launch covering:

- Intermediation;
- Service Delivery and Operational Effectiveness; and
- Balance Sheet and Capital.

While we have now stepped back from our secretariat role, as planned, we will continue to engage with the Forum as necessary to provide regulatory input on any specific business model development proposals arising.

We encourage participating CEOs to continue to drive the Forum forward, and show leadership on behalf of the sector, in this very important form of sector collaboration.

## New members appointed to CUAC

The Minister for Finance, Paschal Donohoe TD announced in December 2020 the appointment of two new members to the Credit Union Advisory Committee (CUAC) which is chaired by Lorraine Corcoran.

The Registry of Credit Unions would like to congratulate Ms. Elizabeth Boylan, Director of Progressive Credit Union and Mr. Michael Ahern, CEO Dubco Credit Union on their recent appointments to CUAC. Further information on these appointments is available in a [press release](#) issued by the Department of Finance on 10 December.

Information on CUAC and its work is available [here](#) on the Department of Finance website.







## Anti-Money Laundering Bulletin – Application of Transaction Monitoring

The Criminal Justice (Money Laundering and Terrorist Financing) Act, 2010 as amended ('CJA 2010') specifies that a designated person must monitor customer transactions in order to identify transactions that may be suspicious in nature, and that the intensity of the monitoring should increase with the complexity and scale of those transactions.

In October 2020, the Central Bank published the [Anti-Money Laundering Bulletin - Transaction Monitoring](#) ('the Bulletin').

The Bulletin sets out findings from recent supervisory engagements (including engagements with the Credit Union sector) with regard to the application of transaction monitoring controls. Weaknesses have been identified in this area including:

- Failure to use the business risk assessment and customer risk assessments to configure appropriate transaction monitoring controls;
- The use of generic monitoring thresholds across varying product, service, or customer types which do not reflect the nuances of expected transaction patterns of those customer/product/service types;
- The implementation of sample based approach to transaction monitoring which limits the ability to detect unusual patterns of transactions; and
- Insufficient technological resources to ensure that all customers are in scope for transaction monitoring and accurate customer and transactional data is captured for the purpose of this process.

The Bulletin also outlines the Central Bank's expectations in relation to transaction monitoring controls, which include:

- The use of the business wide assessment to determine the appropriate transaction monitoring solution;
- Consistency between a firm's Customer Due Diligence ('CDD'), transaction monitoring and Suspicious Transaction Reporting processes; and
- Ensuring that up to date information, and appropriate CDD documentation, is on file to determine if transactional activity is suspicious.

Where a Credit Union identifies a suspicious transaction, it is required to submit a Suspicious Transaction Report ('STR') to both An Garda Síochána (via the An Garda Síochána GoAML system) and the Revenue Commissioners (via the Revenue Online System ('ROS')). Each Credit Union must ensure that it has successfully uploaded STR's on the aforementioned systems.

Credit Unions should ensure that they evidence that the expectations outlined in the Bulletin and the CBI guidelines<sup>1</sup> are fully considered and implemented where appropriate. The Central Bank's supervisory engagement with Credit Unions in the area of Anti Money Laundering/Combating Terrorist Financing will continue to assess Credit Union's compliance with the CJA 2010 with particular focus on Governance, Risk Assessment and Monitoring.

<sup>1</sup> The Central Bank of Ireland published the Anti-Money Laundering and Countering the Financing of Terrorism Guidelines on 6 September 2019 - [Risk and Guidance | Central Bank of Ireland | Central Bank of Ireland](#)

## Bank Account Register

The Central Bank is currently working with the Department of Finance in relation to the commissioning of a Bank Account Register. This register is required pursuant to Article 32a of the Fifth EU Anti-Money Laundering Directive ((EU) 2018/843) ('5AMLD'). This sets out requirements for Member States to maintain a Bank Account Register of beneficial ownership details of: (1) Bank & Payments Accounts; and (2) Safe Deposit Boxes held by credit institutions (the register will not contain balance or transactions data). The Central Bank will be responsible for maintaining a Bank Account Register in Ireland.

The Statutory Instrument to transpose Art 32(a) of the Directive into law is currently being drafted and is expected to be progressed in Q1 2021.

In accordance with 5AMLD, access to this register will be restricted to the authorities concerned with the prevention of Money Laundering and Terrorist Financing – i.e. Garda Financial Intelligence Unit (FIU) and the Criminal Assets Bureau (CAB). There will be no public access to the Bank Account Register.

The Scope of application is:

- All bank and payment accounts identified by IBAN without exception. This means that accounts of minors, those with minimal balances, dormant accounts, etc. are all within scope.
- All safe deposit box facilities provided by credit institutions (i.e. banks & credit unions).

The Central Bank has been working with relevant financial services sectors in preparation for the introduction of the register, including the Credit Union sector. Much of this work is associated with preparations for facilitating the operation of the register and the secure encrypted communications around information requests from authorities and the provision of relevant information by financial institutions. Your credit union should have been contacted in relation to setting up a secure connection with the Central Bank. If you have not received contact from the Central Bank, or have further queries, please contact us at [BAR@centralbank.ie](mailto:BAR@centralbank.ie)

*The Central Bank will keep you apprised of developments in this area to assist you in preparation for operation of the Bank Account Register.*

## Credit Union AGMs – Legislative Amendment

Following engagement between Department of Finance, Central Bank and sector representatives the Finance (Miscellaneous Provisions) Bill 2020 was published on 18 November and signed into law on 16 December 2020.

The Act makes a number of amendments to the Credit Union Act, 1997 – including the following changes:

- Credit unions, at their discretion, can now host General Meetings remotely (wholly or partially) on a permanent basis.
- The deadline for holding of 2020 AGMs has been extended to the end of the ‘interim period’ – 16 December 2020 to 30 April 2021.
- General Meetings can be undertaken remotely during ‘interim period’ notwithstanding any other provisions of the 1997 Act or the rules of a credit union - i.e. a rule amendment is not required in advance of a remote general meeting held before 30 April 2021.
- Holding of General Meetings remotely outside the interim period will only be permitted if provided for in the rules of the credit union.
- Electronic voting now permitted.
- Board of directors permitted to cancel, relocate or change the means of holding a general meeting where necessary, and permitted to cancel a general meeting due to unexpected and exceptional circumstances.
- Sets out information to be provided to members in notices.
- Proxy voting permitted – subject to certain rules set out in legislation – must be provided for in the rules of a credit union.

Credit unions should refer to the Act to review all of the changes introduced. The Act can be accessed [here](#) on the Oireachtas website.

It has come to our attention that a number of credit unions are unclear on what steps they need to take if they want to ensure that they continue to have the option to hold virtual general meetings beyond the interim period which ends on 30 April 2021.

The circular we issued on 25 February notes that, outside the interim period (which ends on 30 April), under section 78(1) of the 1997 Act a credit union general meeting must be held in the manner provided for under the rules of the credit union.

Therefore, where credit unions want to continue to ensure that they have the option to hold virtual general meetings beyond the interim period, they will need to pass a rule amendment at their 2020 AGM. While such rule amendments could be passed at the next physical general meeting held after the end of the interim period credit unions need to consider the risk that gatherings may continue to be limited or prohibited under COVID-19 public health measures.

## Revised arrangements for contacting the Registry of Credit Unions

Due to the Government COVID-19 Public Health Measures, the majority of Central Bank staff continue to work remotely. Given the current arrangements, we request credit unions when contacting the Registry of Credit Unions to please email correspondence to their relevant supervisor or if it is a general query, please email [rcu@centralbank.ie](mailto:rcu@centralbank.ie).

## Central Bank Publications

Credit unions can access Central Bank Economic Publications and the Governor’s Blog, which are available on the [Central Bank website](#). These documents may assist credit unions in strategy formulation and compilation of financial projections.

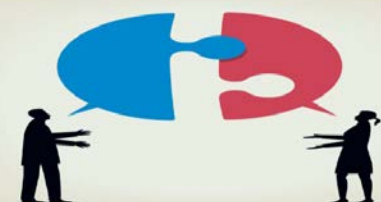
### Publications:

- [Statement on the end of Brexit transition period;](#)
- [Quarterly Bulletin 2021:1 - Recovery anticipated in second-half of 2021 picking up momentum in 2022;](#) and
- [“We must look beyond the pandemic to improve our understanding of longer term risks” - Governor Gabriel Makhoul.](#)

### Governor’s Blog:

- [Inclusion, diversity, and the pandemic;](#)
- [The economist as weaver: a letter to students of economics;](#)
- [Understanding finance;](#)
- [Financial stability review;](#) and
- [Monetary policy and interest rates in Ireland](#)

Credit unions can [access the Central Bank COVID-19 Hub](#), which provides the latest information for regulated firms on the Central Bank’s response to COVID-19.





## Contact Us

Central Bank Query Registry of Credit Unions	Central Bank Division	Central Bank Contact
General day to day supervisory queries	Registry of Credit Unions (RCU)	Credit union supervisor / <a href="mailto:rcu@centralbank.ie">rcu@centralbank.ie</a>
<b>Queries for other Central Bank Divisions</b>		<b><a href="#">Website</a></b>
Anti-Money Laundering/Countering Terrorist Financing	Anti-Money Laundering	<a href="mailto:AMLpolicy@centralbank.ie">AMLpolicy@centralbank.ie</a>
Financial Sanctions		<a href="mailto:sanctions@centralbank.ie">sanctions@centralbank.ie</a>
<b>Consumer Protection:</b>	Consumer Protection	<a href="mailto:CPCOperations@centralbank.ie">CPCOperations@centralbank.ie</a>
Retail Intermediaries – Authorisation queries		<a href="mailto:riauthorisations@centralbank.ie">riauthorisations@centralbank.ie</a>
Retail Intermediaries – Supervision queries		<a href="mailto:brokers@centralbank.ie">brokers@centralbank.ie</a>
Retail Intermediaries – Revocation queries		<a href="mailto:revocations@centralbank.ie">revocations@centralbank.ie</a>
Retail Intermediaries – Post Authorisation queries		<a href="mailto:postauth@centralbank.ie">postauth@centralbank.ie</a>
Deposit Guarantee Scheme	Deposit Guarantee Scheme	<a href="mailto:info@depositguarantee.ie">info@depositguarantee.ie</a>
<b>Fitness and Probity:</b> Individual Questionnaire queries	Regulatory Transactions	<a href="mailto:fitnessandprobity@centralbank.ie">fitnessandprobity@centralbank.ie</a>
Funding Levy	Financial Control	<a href="mailto:funding@centralbank.ie">funding@centralbank.ie</a>
<b>Minimum Reserve Requirements:</b> Calculation of reserve requirements	Statistics	<a href="mailto:creditunion@centralbank.ie">creditunion@centralbank.ie</a>
Transfer of amounts to/from your account in the Central Bank	Euro-settlements team	<a href="mailto:eurosettlements@centralbank.ie">eurosettlements@centralbank.ie</a>
Confirming balances and meeting your reserve requirement	Financial Markets	<a href="mailto:modesk@centralbank.ie">modesk@centralbank.ie</a>
Online Reporting queries	Regulatory Transactions	<a href="mailto:onlinereturns@centralbank.ie">onlinereturns@centralbank.ie</a>
Recirculation of euro banknotes	Currency Issue	<a href="mailto:CID.monitoring@centralbank.ie">CID.monitoring@centralbank.ie</a>
Reporting Payment Statistics	Payments and Securities Settlements	<a href="mailto:paystats@centralbank.ie">paystats@centralbank.ie</a>