



**REPORT ON THE FINANCIAL
INCLUSION FORUM
HELD AT WILD GEESE LODGE IN
HARARE
19 – 20 FEBRUARY 2019**

1 INTRODUCTION

- 1.1. Following the launch of the National Financial Inclusion Strategy (NFIS) in March 2016, and half-way through the implementation period, it became necessary to reflect and take stock, learn from experiences to date and refocus activities to ensure attainment of the desired goals and objectives.
- 1.2. In this regard, the three major financial sector regulatory authorities in Zimbabwe, namely Reserve Bank of Zimbabwe, Insurance & Pensions Commission and Securities and Exchange Commission of Zimbabwe, in collaboration with FinMark Trust, hosted a two-day Financial Inclusion forum from 19 to 20 February 2019 at Wild Geese Lodge in Harare. The forum was held under the theme ***“Strengthening Financial Inclusion in Zimbabwe, from Policy to Practice: Lessons and Way Forward”***
- 1.3. Presenters were drawn from FinMark Trust, local experts in microfinance, digital finance providers and the financial sector regulators to discuss and provide input towards strengthening the current financial inclusion initiatives.
- 1.4. The conference drew participants from the banking sector, microfinance sector, financial sector regulators, government ministries and departments, industry associations, insurance sector, capital markets, academia, and development partners.

2 OBJECTIVES OF THE CONFERENCE

- 2.1 The Forum was aimed at:
 - a. taking stock of the NFIS implementation by the various key players as well as drawing lessons from experiences to date;
 - b. learning from regional and international experiences;
 - c. promoting stakeholder buy-in and build trust and confidence among stakeholders and target beneficiaries of the program;
 - d. determining policy options and solutions to increase financial inclusion and develop recommendations for policy makers, regulators and all other stakeholders to support their financial inclusion efforts; and
 - e. mapping a way forward that will enable stakeholders to realise the set objectives and the 2020 financial inclusion targets.

3 SUMMARY OF PROGRAMME SESSIONS

- 3.1 A summary of the major issues covered and takeaways during the two-day conference are highlighted hereunder:

Welcome Remarks – Reserve Bank of Zimbabwe

- 3.2 The Reserve Bank welcomed all the participants to the forum and expressed appreciation to FinMark Trust for the support extended to the Reserve Bank and its partners on the various initiatives towards the financial inclusion agenda.

Background and Objectives of the forum...

- 3.3 FinMark Trust provided a brief background and objectives of the forum.
- 3.4 It was noted that FinMark Trust collaborates with the Reserve Bank and other stakeholders in the implementation of the Financial Inclusion Strategy in Zimbabwe. The Trust conducted the following surveys to ascertain level of financial inclusion in Zimbabwe;
- a) FinScope Consumer Survey Zimbabwe 2011
 - b) FinScope MSME Survey Zimbabwe 2012; and
 - c) FinScope Consumer Survey Zimbabwe 2014.
- 3.5 Mr. Nyamazana advised that plans are underway to conduct another FinScope Survey to ascertain the current financial inclusion status.
- 3.6 It was indicated that in line with SADC guidelines, a FinScope Survey should be conducted within three years. Due to funding constraints, the Zimbabwean survey was last conducted in 2014. It was proposed that the local private sector considers funding the surveys.

Opening Remarks

- 3.7 The Ministry of Finance and Economic Development acknowledged significant progress that has been made in the implementation of financial inclusion initiatives under the National Financial Inclusion Strategy.

- 3.8 The Ministry representative noted the importance of technology, mobile money platforms, and the Reserve Bank empowerment facilities in driving financial inclusion.
- 3.9 The need for an effective Financial Inclusion Monitoring and Evaluation Framework was also highlighted.

Key Note Address...

- 3.10 Dr. Chipika, the Deputy Governor of the Reserve Bank of Zimbabwe, welcomed all the guests. The Deputy Governor indicated that the NFIS is a transformative agenda and its objectives dovetail with the United Nations Sustainable Development Goals (SDGs), Zimbabwe's vision to become a middle-income economy by 2030, the Transitional Stabilisation Plan as well as the 2018/2019 National Budget.
- 3.11 The Deputy Governor added that Zimbabwe is a signatory to the SDGs that are meant to reduce poverty and Financial Inclusion is a key enabler.
- 3.12 Further, the Deputy Governor highlighted that the Reserve Bank supports the financially excluded segments of the economy including the Micro to Small and Medium Enterprises (MSMEs), Women, PWDs, rural population, smallholder farmers, the Youth and other marginalised segments which constitute focus areas in the NFIS.
- 3.13 As part of implementation of the strategy, various initiatives have been implemented to support these segments, including empowerment facilities, and financial literacy programmes.
- 3.14 She provided a brief outline of the macroeconomic challenges in Zimbabwe including fiscal imbalances, foreign currency shortages, multi-tier pricing system, high levels of informalisation, corruption, externalisation and high import appetite.
- 3.15 In Zimbabwe, fintech is at the forefront in driving Financial Inclusion with innovations such as mobile banking, digital finance, psychometric credit scoring models and biometric technology. These are increasing access to, usage and quality of financial services.
- 3.16 Mobile Network Operators, banking and non-bank financial institutions continue to explore innovative ways of delivering financial services to the marginalised segments through leveraging on technology.
- 3.17 The Reserve Bank launched various empowerment facilities and other financial inclusion initiatives to benefit various priority groups that are financially excluded.

- 3.18 As at 31 December 2018, a total of \$233.12 million had been disbursed under the empowerment facilities representing 55% of the total available funds.
- 3.19 RBZ facilities have also contributed to the development of various value chains particularly in agriculture, mining, manufacturing, horticulture and resuscitation of irrigation schemes and tourism in various parts of the country. The facilities also support generation of exports.
- 3.20 The Reserve Bank became a member of the Sustainability Standards and Certification Initiative (SSCI) Council in September 2018. The SSCI is driven by the European Organisation for Sustainable Development (EOSD) under the Global Sustainable Finance Network.
- 3.21 The objectives of SSCI include the development of core competencies and capacity building to create effective global systems; driving global change through benchmarking of all standards, domestic and international; and providing a unique stakeholder platform for collaboration, knowledge sharing, and networking.
- 3.22 To date, eight (8) financial institutions have confirmed their readiness to participate in the SSCI Project.
- 3.23 Dr. Chipika concluded by highlighting financial inclusion initiatives by both the Reserve Bank and other private players including Econet and Zimbabwe Women Microfinance Bank (ZWMB).
- 3.24 Stakeholders were challenged to come up with initiatives to accelerate the pace of financial inclusion implementation.
- 3.25 She also highlighted the need to balance financial inclusion and financial stability.
- 3.26 A request was made to development partners to provide technical assistance to enable development of a monitoring and evaluation framework for the National Financial Inclusion Strategy.

PRESENTATIONS AND DISCUSSIONS...

REGULATORY PERSPECTIVES – FINANCIAL INCLUSION INITIATIVES AND CHALLENGES

Securities and Exchange Commission of Zimbabwe (SECZIM)

- 3.27 The Securities and Exchange Commission of Zimbabwe (SECZIM) presented on their role and initiatives in advancing the Financial Inclusion Strategy. The key milestones include launch of the online trading platform (C-Trade) in July 2018.
- 3.28 It was noted that the Financial Inclusion initiatives in the capital markets are premised on investor awareness of the capital markets products. The commission is conducting financial literacy campaigns and investor education on capital markets.
- 3.29 As part of awareness efforts, SECZ is publishing investor awareness articles in the Herald newspaper every week to educate Zimbabweans on the capital markets. The Commission further intends to translate the investment guidelines into local languages to improve participation in the capital markets.
- 3.30 It was, however, advised that due to funding challenges, the Commission has not been able to raise awareness through other channels including road shows.

Insurance and Pensions Commission (IPEC)

- 3.31 The Commission provided status of the sector covering architecture, access level, and regional comparison.
- 3.32 Financial Inclusion initiatives and challenges in the sector were also highlighted. The Commission is focusing on the provision of products and services that cater for the under-served and marginalised segments. These include registration of micro-insurance firms, financial literacy initiatives and relaxation of know your customer (KYC) requirements.
- 3.33 The challenges faced in the sector included high concentration in funeral insurance products, poor corporate governance structures and low confidence levels, following the loss of pension values during hyperinflation and subsequent introduction of the multiple currency in February 2009. As a measure to restore lost confidence, a Commission of Inquiry was set up to probe the process used to convert pensions and insurance following dollarization of the economy. The findings and recommendations are expected to change the landscape of the Insurance and Pension industry in Zimbabwe.
- 3.34 Major findings by the Commission of Inquiry include legislative weaknesses, regulatory failure, weak corporate governance within the regulated institutions and absence of effective resolution framework for failed institutions.

- 3.35 In the absence of a troubled institution resolution framework, the Commission observed instances where institutions were wound up without the Regulator taking steps to protect policyholder interests.
- 3.36 The major recommendations included legal reforms, regulatory and supervisory reforms at IPEC, governance reforms at regulated institutions level, and formulation of a compensation framework to regain lost consumer confidence.

PRIVATE SECTOR FINANCIAL INCLUSION INITIATIVES AND EXPERIENCES

Financial Securities Exchange (FINSEC)

- 3.37 It was advised that the Escrow Group, through the C-Trade platform facilitates financial inclusion and deepening of the capital markets by allowing those with mobile and online platforms to directly trade in shares listed on the Zimbabwe Stock Exchange (ZSE). The initiative seeks to promote financial inclusion through encouraging participation through the mobile payment platform.
- 3.38 It was noted that the level of financial inclusion in capital markets is very low largely attributable to misconceptions that trading in securities is a preserve of the affluent.
- 3.39 The sector has also put in place an alternative trading platform for SMEs to enable undercapitalised small enterprises to raise capital.
- 3.40 To enhance financial inclusion, it was proposed that upon issuance of government bonds, a certain percentage can be allocated towards the marginalised.

Steward Bank...

- 3.41 Steward Bank presented on the role of technology in financial inclusion. The bank presented on the journey travelled by Steward Bank as a digital bank which has transformed banking in Zimbabwe, riding on big data.
- 3.42 Service providers using big data tools can understand how customer patterns work and have the ability to estimate customer satisfaction and needs, and are thus able to come up with products and services that customers would want. 3.43 The benefits of cost effective delivery channels (branchless banking) in reaching out to the marginalised was emphasised.

- 3.44 Further, the advantages of social media marketing in enhancing visibility and brand awareness was also emphasised. Social media greatly increases brand recognition as most customers spend most of their time on social media.
- 3.45 Benefits of convenient banking such as digital and instant accounts opening and short-term loans was also emphasized. It was further indicated that core banking systems are fast becoming irrelevant, as information should be on the cloud.

Old Mutual Limited...

- 3.46 The Managing Director of Old Mutual Finance presented on Financial Inclusion Initiatives by Old Mutual Zimbabwe.
- 3.47 The initiatives include the following:
- i. Training the financial institution's staff on sign language to enable the institution to assist People with Disabilities;
 - ii. Financial support for small holder farmers;
 - iii. Participation in value chain financing;
 - iv. Provision of an appropriate working space for SMEs including the Eastgate SME Business Park;
 - v. Conducting financial literacy programs. It was advised that Old Mutual
 - vi. Participated in the 2018 Global Money Week and will be participating during the
 - vii. 2019 celebrations;
 - viii. Technology hubs for the youth;
 - ix. Women's desk;
 - x. Provision of microfinance loans through Old Mutual Finance;
 - xi. Provision of financial services targeting youth, school children, and women. Establishment of green zones that provide for a buffet of financial services.

ZAMFI...

- 3.48 The Executive Director of ZAMFI, highlighted barriers to financial inclusion, financial inclusion initiatives by the microfinance sector, experiences and success stories, role of technology and big data and recommendations.
- 3.49 Major challenges faced by the microfinance sector were highlighted as;

- i. Short term nature of licences;
- ii. Unviable effective interest rate cap of 10% per month;
- iii. Impact of 2% transaction tax on the cost structure; and
- iv. Inadequate funding.

3.50 Mr. Chitambo's recommendations included the following:

- a) Need to have a deeper understanding of the appropriate financing models in Zimbabwe;
- b) Increase microfinance licence tenure to enable sector participants to access long-term funding;
- c) Review of regulatory & microfinance sector capacity and resource constraints, document and systematically address them.

National Payment Systems...

3.51 Various initiatives by the Reserve Bank in promoting financial innovation were highlighted. The Reserve Bank has put in place a robust payment system architecture. The system comprises a settlement hub for large value transactions (RTGS), retail payment systems (internet and POS), and International & Regional Payment Systems (SWIFT and SIRESS).

3.52 Initiatives by the Reserve Bank included the following;

- i. Increased the deployment of POS and Agents across the country, including rural areas;
- ii. Facilitated product enhancements for example safety through EMV and cross border mobile remittances;
- iii. Licensed more DFS products to cater for different market segments;
- iv. Formulated a dedicated Digital Financial Services Strategy to complement actions proposed in the National Financial Inclusion Strategy;
- v. Strengthened payment system oversight through adopting regulatory proportionality to accommodate new types of payment instruments, services, and systems;
- vi. Increased competition among remittances service providers for example, the

- vii. Bank licenced 3 mobile cross border remittance companies.
- viii. Enhanced the regulatory and institutional framework for financial consumer protection –issued retail and payment systems guidelines;
- ix. Approved domestic settlement for international switches for customer convenience-cost reduction
- x. Promoted interoperability –agent sharing, cross network, sharing banks, linked to card payment infrastructure (Ecocash MasterCard, Zimswitch-(TeleCash & One Money)

3.53 To promote innovation, the Reserve Bank has adopted the ‘regulatory sandbox approach’ to carve out a safe and conducive space to experiment with financial technology solutions whilst containing the consequences of failure.

3.54 The use of Digital Financial Services by formerly excluded customers brings along the following new risks associated with the different segments of users:

- i. Lack of Biometric ID increases the potential of ghost users;
- ii. Vulnerability to fraud and other financial crimes;
- iii. Errors and other unwelcome developments;
- iv. Inability to transact due to network/service downtime;
- v. Complex and confusing user interfaces;
- vi. Inadequate recourse from a service provider;
- vii. Non-transparency of fees and other terms; and
- viii. Inadequate privacy and protection of customers’ personal data.

3.55 As part of initiatives to strengthen consumer protection, the following legal frameworks and standards are being formulated:

- i. Consumer Protection Bill;
- ii. Computer Crimes and Cybercrime Bill;
- iii. Electronic Transaction Bill; and
- iv. Data Protection Bill.

Fintech for financial inclusion incorporating big data...

- 3.56 FinMark Trust presented on the benefits of big data to enhance regulatory oversight.
- 3.57 It was indicated that lack of data has long been recognized as a major barrier to extending access to financial services to low-income households and small businesses.
- 3.58 Geospatial data makes it possible to visualize data on a map. It captures and displays the exact location of each access point on a map, which allows users to identify the precise location of banks, banking agents, microfinance institutions (MFIs), mobile money agents, and Point of Sale (PoS) machines.
- 3.59 The data makes it possible to pinpoint areas with limited access to finance and unmet demand. It helps to uncover the geographic challenges low-income people face in accessing and using financial services, and it also reveals opportunities to expand or create new financial products and delivery channels for financial services providers.

Monitoring and Impact Evaluation for Financial Inclusion

- 3.60 FinMark Trust presented on the Monitoring and Evaluation of Financial Inclusion. A measurement and evaluation process is developed to support implementation of the Financial Inclusion Strategy, which is updated annually to report on progress.
- 3.61 It was advised that there is need to put in place a dedicated team or unit to design and implement the monitoring and evaluation framework.
- 3.62 Data required for Monitoring and Evaluation comes from different sources so it needs a coordination structure, agreements and MOUs for data sharing between different agencies and institutions.
- 3.63 Further it was indicated that there is need for a data aggregator for the compilation of financial inclusion data from various stakeholders.
- 3.64 It was highlighted that growth in access has not translated into usage. It was revealed that the majority of adults that report accessing or owning an account at best use them infrequently and at worst do not use them at all.
- 3.65 This raised concerns that current measurement methods are still too bank-centric and that financial inclusion may be overstated if the focus is on take-up of bank accounts.
- 3.66 The need for the development of a robust M & E framework for the National Financial Inclusion Strategy was discussed.

Risk Based Approach to AML - Pilot Project - FinMark Trust

- 3.67 It was advised that the Financial Intelligence Centre (FIC) Amendments Act was signed into South African Law. The Act provides for an introduction of the risk-based approach to the management of AML and CFT risks in South Africa.
- 3.68 In response to the amendment, FinMark Trust formulated the Risk- Based Approach for managing AML/CTF risk for cross border and domestic remittances as well as low value banking services.
- 3.69 The pilot survey involved industry participants and regulatory stakeholders. The industry players involved money transfer agencies namely; Mukuru, Shoprite, American Express, Finbond Bank and Capitec Bank. Regulatory Stakeholders involved National Treasury, South African Reserve Bank and the Financial Intelligence Centre. It was advised that a number of innovations resulted from the pilot study. The partnership with Mukuru resulted in the adoption of simplified due diligence and digital client on-boarding processes which had the support of the National Treasury, South African Reserve Bank, and the Financial Intelligence Centre.
- 3.70 Deliverables included the following;
- i. A product risk assessment for low value remittances and bank accounts; and
 - ii. A framework for Financial Services Providers to support the implementation of
 - iii. Risk Based AML/KYC.
- 3.71 Highlights of the project included;
- i. A sandbox environment supported by the regulators, Central Bank and financial service providers to support the development of the framework;
 - ii. Input from the local regulators and an international expert on the interpretation and implementation of Risk Based AML/KYC; and
 - iii. A request from the regulators to expose all Financial Service Providers operating low value remittances and bank accounts, to the methodology and frameworks.
- 3.72 It was further advised that a number of new innovations resulted from the pilot survey. In particular, the partnership with Mukuru resulted in a market first application of simplified due diligence and digital client on-boarding.
- 3.73 It was noted that there are huge opportunities to widen financial inclusion by applying innovations around Customer Due Diligence under the Risk Based Approach. Utilising

client's electronic footprint to verify information can lower cost while including previously excluded clients.

- 3.74 Further, a cooperative approach between supervisors and industry in applying risk-based approaches can be an effective mechanism for ensuring stability while expanding access and inclusion.

4 WAY FORWARD AND KEY TAKE WAYS FROM BREAK OUT SESSIONS

4.1 The forum participants were grouped into four (4) commissions to facilitate focused discussions on key financial inclusion issues including recommendations for policy formulation by regulators and other relevant stakeholders.

4.2 The commissions were:

- a) Capital markets;
- b) Women, Youth & MSMES;
- c) Public/private sector collaboration; and
- d) Academics, MFIs, MNOs, Developmental Institutions and Banking institutions.

4.3 A summary of key highlights of the breakaway session is provided in the table below.

COMMISSION: SUMMARY OF KEY TAKEAWAYS	
Capital Markets	<input checked="" type="checkbox"/> It was noted that there is lack of a broader understanding of the National Financial Inclusion Strategy from a capital market player's point of view.
	<input checked="" type="checkbox"/> Capital market players have no understanding and buy-in of the National Financial Inclusion Strategy due to lack of sector specific short-term and long-term financial inclusion goals and objectives and key performance indicators.
	<input checked="" type="checkbox"/> Capital markets sector has not developed financial inclusion indicators to monitor progress in achieving the 2020 financial inclusion goals.
	<input checked="" type="checkbox"/> Development of regulatory technology for the sector is key to enhancing regulatory process.
	<input checked="" type="checkbox"/> Regulators should scrutinize frameworks to determine whether there is adequate consumer protection.
	<input checked="" type="checkbox"/> Continuous capacity building of both regulators and capital market service providers and the consumers is pertinent.
	<input checked="" type="checkbox"/> Regulators must resuscitate forums that enabled sharing of information among stakeholders.
	<input checked="" type="checkbox"/> A framework on data protection should be developed in view of the advent of fintech.
	<input checked="" type="checkbox"/> There are limited insurance products available which are predominantly funeral products.
	<input checked="" type="checkbox"/> Fintechs are now a new form of shadow banking emerging hence need to enhance regulation of the same.
	<input checked="" type="checkbox"/> There is need for authorities to continuously monitor developments and proffer sustainable regulations to minimize financial instability.
	<input checked="" type="checkbox"/> There is high informalisation in the economy hence such informal business may not have access to the capital markets.
	<input checked="" type="checkbox"/> There is need to expedite current initiatives on the alternative trading platform.
	<input checked="" type="checkbox"/> There is lack of incentives to private sector players to participate in financial education and infrastructure development aimed at enhancing financial inclusion.
Women, Youth & MSMEs	<input checked="" type="checkbox"/> The breakaway commission looked at the current status of inclusion of MSMEs, Women and the Youth.
	<input checked="" type="checkbox"/> The commission noted that there is need to enhance data granularity as data quality is critical in assessing financial inclusion initiatives.
	<input checked="" type="checkbox"/> It was also noted that there is need for collaboration among key stakeholders to promote the growth of MSMEs, Women and the Youth. The rural communities also require special consideration as they have limited collateral to pledge for loans. The absence of viable markets was noted as a major hindrance to the growth of the MSMEs, women and youth segments.

	<p><input checked="" type="checkbox"/> The following were some of the challenges highlighted by the breakaway commission:</p> <p>a) Negative interest rates prevailing in the market;</p> <p>b) Absence of collateral to secure loans for RBZ Empowerment facilities;</p> <p>c) Difficulties in reaching out to women in rural areas;</p> <p>d) Absence of clear segmentation within the three target groups to allow for specific product development to serve the segment;</p> <p>e) Registration of leases by council authorities are not uniform among councils in Zimbabwe;</p> <p>f) Low levels of monitoring after loan disbursements;</p> <p>g) Short-term tenure of Microfinance Licences;</p> <p>h) Inadequate funding;</p> <p>I) Inadequate financial literacy programmes.</p>
	<p><input checked="" type="checkbox"/> The Commission looked at the current status of the relationship between the public and the private sector.</p>
Public/private sector collaboration	<p><input checked="" type="checkbox"/> It was agreed that there is some element of collaboration though more needs to be done to improve the current status.</p>
Academics, MFIs, MNOs, Developmental Institutions and Banks	<p><input checked="" type="checkbox"/> It was noted that the current silo mentality within government departments, where one had to visit numerous departments does not auger well for “ease of doing business” efforts that are underway. This current scenario was attributed to the high levels of bureaucracy within the government.</p>
	<p><input checked="" type="checkbox"/> The commission also noted that there is no common understanding and/or appreciation of matters relating to Financial Inclusion between the government and the private sector, which has resulted in knowledge gaps amongst the parties.</p>
	<p><input checked="" type="checkbox"/> Further, it was highlighted that there are different objectives for financial inclusion between the government and the private sector, where the private sector was profit driven, while the government has social motives. An example was given where POTRAZ was installing base stations in areas not serviced by private MNOs, under the universal access program, while private sector will only invest where there is a return.</p>
	<p><input checked="" type="checkbox"/> Within the private sector, it was noted that the sector is not speaking with one voice as there are many associations representing the sector, thus resulting in lack of collaboration within the sector.</p>
	<p><input checked="" type="checkbox"/> It was also noted that the sector stands to benefit more from collaboration than competing, as a lot of activities were happening but in a disjointed manner.</p>
	<p><input checked="" type="checkbox"/> The following stakeholders were identified to build a support structure for technical support, training, development of a funding framework and buy-in at the highest level -</p>

	Government, MoFED, RBZ, SECZIM, IPECZ, Min of Primary & Sec Education, Min of Higher & Tertiary Education, Min of Agric, Min of Commerce, CZI, ICZ, POTRAZ, CCZ, ZNCC, BAZ, NGOs, MNOs and Church Organisations.
	<input checked="" type="checkbox"/> The commission agreed the following as the low hanging fruits that the public and private sectors can quickly collaborate to ensure attainment of the NFIS objectives; <ul style="list-style-type: none"> i. Education, Training & Awareness; ii. Research & Development; iii. Technical Assistance on Monitoring & Evaluation; iv. Communication Strategy for the NFIS; and v. Ensuring accountability by developing and agreeing on key performance indicators to measure/assess performance.
	<input checked="" type="checkbox"/> The commission highlighted that there is need to restore confidence in the banking sector to enhance financial inclusion and financial stability
	<input checked="" type="checkbox"/> The commission also noted that adoption of international standards which do not suit the Zimbabwean environment makes it difficult to operationalize and comply with the standards in the financial services sector.
	<input checked="" type="checkbox"/> The commission noted that inflation in the economy was eroding Microfinance Institutions' capital positions.
	<input checked="" type="checkbox"/> It was noted that MFIs were failing to access Financial Inclusion Funds from the Reserve Bank for on lending due to lack of collateral.
	<input checked="" type="checkbox"/> It was noted that value chains were fragmented.
	<input checked="" type="checkbox"/> The commission highlighted that legislation for company registration is cumbersome and costly, discouraging MSMEs from formalisation. Government should expedite the improvement of the business environment in Zimbabwe to promote entrepreneurship.
	<input checked="" type="checkbox"/> The commission proposed the development of legislation to create venture funds. Venture capital will assist in reducing informality of the MSMEs for them to be able to access financial services.
	<input checked="" type="checkbox"/> It was noted that there is need to improve the integrity of financial data to protect customers.
	<input checked="" type="checkbox"/> The commission also highlighted that financial institutions should ensure that empowerment facilities are utilized for the intended purposes and reach the lower income groups.