



CREDIT CONTROL MONITORING



CHAPTER 22 MODULE C ABM By Ashish Sir



Why Credit Monitoring is Essential?

Even after a thorough credit appraisal, documentation & collateral security, the risk of default increases over time due to the dynamic nature of the business environment.

- ✓ **Ensure Funds are Used for Intended Purpose** – Detect any unauthorized use of bank funds. 🔍
- ✓ **Track Business Performance** – Identify any deterioration in financial health early. 📈
- ✓ **Take Timely Actions** – If deterioration persists, initiate recovery or legal actions before further losses. ⚠️



Tools for Credit Monitoring (Loan Review

Mechanism - LRM) 🛠️

1 Monitoring Account Conduct 📊



Bank account transactions reveal financial health & fund usage.



Red Flags:



Frequent Overdrawings

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- Bounced Cheques/Bills
- Delays in Stock Statements
- Low Turnover in Account
- Routing Transactions via Other Banks
- Non-Payment of Loan Interest/EMIs
- LC Devolvement/Bank Guarantee Invocation

✓ **Bank's Actions:**

- ✓ More frequent **stock inspections**
- ✓ **Ensure sales proceeds** are routed through the borrower's account
- ✓ Convert **hypothecation to pledge** for better control over stocks

2 Stock & Receivables Statements

 Borrowers submit **monthly stock & receivables** statements, which help banks calculate **Drawing Power (DP)**.

Key Risk Indicators:

- **Old Non-Moving Stock Accumulation**
- **Receivables Above 6 Months** (Should be moved to Non-Current Assets)

✓ **Bank's Actions:**

- ✓ **Cross-check** stock records during **field inspections**

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- ✓ **Exclude old receivables** from DP calculations to prevent over-financing

3 Stock & Receivables Audit 🏢

- 📌 **Used in medium & large accounts** where physical inspections aren't feasible.

- 📌 **Stock & receivables verification ensures borrower's financial statements are accurate.**

✓ **Bank's Actions:**

- ✓ Conduct independent **stock & receivables audit**
- ✓ Identify discrepancies between **borrower's claims & actual inventory/sales**

4 Analysis of Financial Statements & Auditor's Reports 📄

📊 **Annual financial statements help assess:**

- ✓ **Use & diversion of funds**
- ✓ **Company's financial health**
- ✓ **Profitability & debt realization**
- ✓ **Bank's Actions:**
- ✓ **Mandatory financial analysis for working capital renewal**
- ✓ **Investigate sudden decline in revenue/profit**

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5 Periodic Visits & Inspections

Why it's important?

- ✓ Helps banks assess real-time business activity
 - ✓ Ensures assets charged to the bank are still available
 - ✓ Verifies that bank's charge over assets is prominently displayed
-

6 Interactions with Key Stakeholders

✓ Talking to Select Creditors & Debtors provides insight into business reputation & payment patterns.

✓ Bank's Actions:

- ✓ Gather market intelligence from suppliers & customers
 - ✓ Monitor payment delays & disputes
-

7 Scrutiny of Borrower's Books of Accounts

Regular review of books helps in detecting:

- Fake transactions
- Artificially inflated revenues
- Unrecorded liabilities

✓ Bank's Actions:

- ✓ Ensure borrower doesn't maintain undisclosed accounts in other

banks

- ✓ Check for **manipulated financial reporting**


8 Market Reports & Industry Trends

- ✓ Market reports from industry associations & credit rating agencies help banks assess borrower's sector performance.

✓ **Bank's Actions:**

- ✓ Compare borrower's performance **against industry benchmarks**
- ✓ Monitor **sector-specific risks (e.g., declining demand in an industry)**


9 Appointing Bank's Nominee on Company's Board

 *In exceptional cases or large loans, banks may appoint a nominee director to oversee financial decisions.*

✓ **Bank's Actions:**

- ✓ Keep **direct control** over borrower's financial decisions
- ✓ Prevent **mismanagement & fund diversion**

10 **Credit Audit**

 **Credit Audit** examines **compliance with bank's policies & sanction conditions.**











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✓ **Bank's Actions:**

✓ **Detect policy breaches early**

✓ **Ensure proper post-sanction monitoring**

Summary: Tools for Credit Monitoring

Monitoring Tool 	Purpose 	Bank's Action 
Account Conduct Monitoring 	Track fund utilization & borrower's financial behavior	Frequent inspections & limit control
Stock & Receivables Reports 	Calculate Drawing Power (DP) & detect financial stress	Exclude non-moving stocks & old receivables
Stock & Receivables Audit 	Cross-check inventory & sales records	Conduct independent audit
Financial Statement Analysis 	Assess financial health & fund utilization	Investigate revenue/profit declines
Periodic Site Visits 	Verify physical assets & business activity	Spot-check stock & assets
Stakeholder Interaction 	Understand business reputation	Gather market insights
Scrutiny of Books of Accounts 	Detect false reporting	Ensure no undisclosed accounts

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Market Reports & Industry Trends 📢	Compare business performance with industry	Monitor sector risks
Appointing Nominee Director 🏛️	Supervise financial decisions	Prevent fund diversion
Credit Audit 🏦	Ensure compliance with lending policies	Identify policy breaches

💡 Real-Life Example: Credit Monitoring in Action 🏦

📌 Case: Fraud Detection through LRM 📱



A major Indian **PSU Bank** financed ₹50 Cr to a **textile firm** for working capital. However, within **6 months**, red flags emerged:

- 🔴 Delayed stock statements 📄
- 🔴 High cheque bounce rate ❌
- 🔴 Sudden large withdrawals & low account turnover 💰

✅ Bank Actions:


- ✓ Conducted **stock audit** – Found **ghost inventory & inflated receivables** 🏢🔍
- ✓ Scrutinized **books of accounts** – Detected **multiple fake transactions** 📱
- ✓ **Credit Audit** initiated – Discovered **funds were diverted to personal accounts** ⚠️

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 **Result?** Loan was **recalled immediately** & assets were **seized before** further damage! 

Conclusion: Why Loan Review Mechanism (LRM) Matters?

 **Early detection of financial stress** prevents loan defaults

 **Real-time credit monitoring** ensures loans are used for intended purposes

 **Proactive banking approach** helps in **reducing NPAs & loan frauds**

◆ **Banks must adopt a holistic Credit Monitoring approach** using AI, real-time audits & big data analytics for efficient risk management! 



RBI Guidelines on Credit Audit & Risk Management

 **Objectives of Credit Audit** 

 **Enhance Credit Portfolio Quality** – Ensure loans are performing well

 **Review Sanction Process & Compliance** – Verify adherence to policies

 **Detect Early Warning Signals**  – Identify accounts at risk of default

 **Independent Risk Assessment**  – Evaluate the effectiveness of credit risk management

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✓ **Suggest Corrective Measures** 📄 – Improve credit administration & staff skills

Structure of Credit Audit Department

📌 **Who conducts the audit?**

The Credit Audit Department or Inspection & Audit Department

📌 **Key Functions:**

 **Processing Credit Audit Reports** – Document and analyze findings

 **Review & Follow-Up** – Advise departments on corrective measures

 **Report to Top Management** – Ensure accountability

 **Maintain Credit Database** – Keep records of all audited advances

Scope & Coverage of Credit Audit

1 Portfolio Review 📄

◆ Examine quality of the bank's **credit & investment portfolio**

◆ **Reduce concentration risk** in specific **sectors** as per RBI prudential norms

◆ Suggest measures for **improving asset quality**

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2 Loan Review 📄

- ✓ Review Loan Sanction Process (including post-sanction compliance)
- ✓ Audit all fresh proposals & renewals within 3-6 months of sanction
- ✓ Focus on large accounts with limits above a specific threshold
- ✓ Random checks (5-10%) on smaller accounts
- ✓ Include sister/group/associate concerns of large accounts

3 Key Review Action Points 🔧

- 📌 Policy & Compliance Verification – Ensure all loans follow bank & RBI guidelines
- 📌 Documentation Check – Verify if security & legal documents are in place
- 📌 Credit Risk Assessment – Identify potential loan risks
- 📌 Account Monitoring – Examine transaction history & fund usage
- 📌 Review Action on Serious Irregularities – Detect fraud or misuse of funds
- 📌 Identify Early Warning Signals 🚨 – Suggest remedial actions

4 Frequency of Credit Audit ⌚

Risk Category 🚦	Audit Frequency 📅
High-Risk Accounts 🔴	Every 3 months
Medium-Risk Accounts 🟡	Every 6 months
Low-Risk Accounts 🟢	Every 1 year


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Credit Audit Procedure






- ✓ **Conducted at the branch level** – On-site review of main operative credit limits
- ✓ **Reports from other branches collected for assessment**
- ✓ **No factory/ office visits required**

Legal Audit for Large Loans (₹5 Cr & Above)

RBI Circular (June 7, 2013) mandates:

- ✓ **Title Deeds Verification** – Ensure property documents are genuine
- ✓ **Periodic Legal Audit** – Conduct for loans of ₹5 Cr & above
- ✓ **Reverification of Title Deeds** – Check with relevant authorities
- ✓ **Quarterly Reports to Board**  – Present legal audit status regularly

Summary: RBI Guidelines on Credit Audit & Risk Management

Aspect 	Objective 	Implementation 
Credit Audit 	Improve portfolio quality & risk management	Conduct periodic reviews & report findings
Loan Review 	Assess loan sanctions & post-sanction process	Review fresh & renewed loans within 3-6 months

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Portfolio Review 📊	Monitor risk concentration & exposure	Suggest corrective actions to reduce loan defaults
Early Warning Signals 🚨	Identify potential NPAs	Implement risk mitigation strategies
Legal Audit 🏛️	Verify title deeds for ₹5 Cr+ loans	Conduct periodic legal checks & report quarterly

💡 **Real-Life Example: Credit Audit in Action** 🚀

📌 **Case: Fraud Detection through Credit Audit** 🏛️

Scenario:

A leading **private bank** in India sanctioned a **₹100 Cr loan** to a **real estate company** for a commercial project.

🔴 **Red Flags Noticed in Credit Audit:**

- ✓ **Property title deeds found to be forged** 🏠
- ✓ **Huge fund transfers to unrelated accounts** 💰
- ✓ **Sales projections inflated in financial statements** 📈

✅ **Bank Actions:**

- ✓ **Stopped further disbursal & initiated forensic audit** 🔍
- ✓ **Loan recalled immediately & assets seized** 🚓
- ✓ **Legal proceedings initiated against the company**

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💡 Result?

- ◆ Saved ₹100 Cr from turning into an NPA
- ◆ Strengthened due diligence process for future loans

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