

## The Payments Strategy Forum – Being responsive to user needs Draft strategy for consultation

### Respondents basic details

<b>Consultation title:</b>	Payment Strategy Forum. Draft strategy for consultation
<b>Name of respondent:</b>	
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<b>Representing (self or organisation/s):</b>	
<b>Email:</b>	
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### Publication of Responses

In responding to this consultation, you are sharing your response with the members of the Payments Strategy Forum (Forum), evaluators appointed by the Forum and the Payment Systems Regulator Limited, ('the PSR' - which provides secretariat services to the Forum). The PSR accepts no liability or responsibility for the actions of the Forum members or evaluators in respect of the information supplied.

Unless you tell us otherwise the Forum will assume that you are happy for your response to be published and/or referred to in our Final Strategy Document. If you do not want parts of it to be published or referred to in this way you need to separate out those parts and mark them clearly 'Not for publication'.

**Please check/tick this box** if you do not want all or parts of your response to be published:

### Declaration

"I confirm that our response supplied with this cover sheet is a formal consultation response that the Forum can publish, unless it is clearly marked 'Not for publication'.

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### Response template

This response template is intended to help stakeholders in responding to the questions set out in our Draft strategy for consultation and in its Supporting Papers.

If you do not want parts of or all of your response to be published you need to state clearly ('Not for Publication') over specific information included in your response, please be sure to clearly mark this by yellow highlighting it. We will assume that all other information is suitable for publication.

Responses should be emailed to us at [Forum@psr.org.uk](mailto:Forum@psr.org.uk) in Word and PDF formats by no later than **14 September 2016**. Any questions about our consultation can also be sent to [Forum@psr.org.uk](mailto:Forum@psr.org.uk).

Thank you in advance for your feedback.

### QUESTIONS IN RELATION TO SECTION | RESPONDING TO CONSUMER AND BUSINESS NEEDS

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**Question 1:** Do you agree we have properly captured and articulated the needs of End Users? If not, what needs are missing?

Yes

**Question 2a:** Do stakeholders agree with the financial capability principles?

Yes

**Question 2b:** How should these principles be implemented?

No specific comments/suggestions

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**Question 2c:** How their implementation should be overseen and how should the industry be held to account?

Given the diversity of the user groups, providers and consumers it is necessary to ensure that the implementation is seamless and effective. Accordingly, I recommend and a permanent committee set up with the representatives of BBA, Payment system Regulator, banks and Non-Bank Authorized Payment Institutions should oversee the implementation.

**Question 3a:** What benefits would you expect to accrue from these solutions (not necessarily just financial)?

The solutions proposed would lead to greater customer assurances, safety and affordability to consumers.

**Question 3b:** Do you agree with the risks we outline? How should we address these risks? Are there further risks we should consider?

Yes.

**Question 3c:** Is there a business case for investing in solutions to address these needs and if not, how such an investment can be justified?

Absolutely Yes.

**Question 3d:** Are there any alternative solutions to meet the identified needs?

Given the current payment universe and practices the proposed solutions appears as the best fit

**Question 3e:** Is there anything else that the Forum should address that has not been considered?

Yes.

The solutions proposed does not seem to cover payments made by resident (Individuals and businesses) for credit of non-resident accounts maintained by overseas entities (including nostro accounts of overseas banks and other entities) Such payments are in fact international payments and are paid out to beneficiaries by banks abroad. There are no procedures/processes available for screening the beneficiaries as of now.

The magnitude of such payments are large and it is important to implement measures to address this along with the proposal solutions being proposed now.

***The proposed solutions should also be capable of blocking such payments intended for credit of foreign accounts unless they are originated by authorized Banks and Payment Institutions and other Payment services providers in UK.***

**Question 4a:** Is there a business case for investing in transitional solutions while the new payments architecture is being delivered and if not, can such an investment be justified?

No specific suggestions

**Question** Are there any viable technical solutions to deliver some of the consumer benefits

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**4b:** early without compromising the longer term solutions recommended by the Forum?

No specific comments

## QUESTIONS IN RELATION TO SECTION 6 | IMPROVING TRUST IN PAYMENTS

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**Question 5a:** Do you agree with our proposal regarding customer awareness and education? If not, please provide evidence to support your response.

Yes.

**Question 5b:** Do you agree the delivery of these activities should be through an industry trade body? If so, which one would be most appropriate to take the lead role?

Yes. While we agree on principle I do not find any single entity capable of brining all the set objectives on the table. I would therefore would suggest a task force drawn from diverse interests and exposures to be entrusted with the job under overall guidance of BBA

**Question 6:** Do you agree with the establishment of guidelines for identity verification, authentication and risk assessment? If not, please provide evidence to support your response.

Yes.

**However, we must be mindful of the fact that a large number of remittances (cross border) are being done by non-banking payment institutions where identify production is insisted only on exceeding a threshold of euro1000 in conformity with EU payment regulations.**

**Over the years this has become one of the grey areas and unless this is addressed effectively the system will lose sight of the risks embedded in such practices. It is important that all payments made originated by Banks or nor banks to pass through standard on boarding practices and is made subject to standard ID/KYC documentation**

**Question 7a:** Do you agree with our solution to develop a central data repository for shared data and a data analytics capability? If not, please provide evidence to support your response?

Yes.

**But we must also take into account the process of payments made by agents (including corner shops) of nonbank payment service providers. Unless this process is examined and brought under standard uniform on boarding processes with minimum KYC requirements, the payment system proposed will not be achieving inclusivity in terms of risk mitigation efforts**

**Question 7b:** Do you agree with the potential risks we outline? How should we address these risks? Are there further risks we should consider?

Yes

**Question 7c:** If any legislative change is required to deliver this solution, would such change be proportionate to the expected benefits?

Yes

**Question 8a:** Do you agree with our solution for financial crime intelligence sharing? If not, please provide evidence to support your response?

Yes

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**Question 8b:** In what way does this solution improve financial inclusion? More generally, how should the intelligence sharing be used for the “public good”?

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**Question 8c:** Do you agree with the potential risks we outline? How should we address these risks? Are there further risks we should consider?

Yes

**Question 8d:** Do the benefits of financial crime intelligence sharing outweigh the new potential risks created?

Yes

**Question 8e:** Can this operate without changes to legislation? If not, what changes to legislation would be required to make this happen? If any legislative change is required, would such change be proportionate to the expected benefits?

No.

**Question 8f:** What governance structure should be created to ensure secure and proper intelligence sharing?

**Question 9:** Do you agree with the proposal to develop a Central KYC Utility? If not, please provide evidence to support your response?

Yes

**Question 10:** Do you agree with our solution for enhancing the quality of sanctions data? If not, please provide evidence to support your response?

Yes

## QUESTIONS IN RELATION TO SECTION 7 | SIMPLIFYING ACCESS TO PROMOTE COMPETITION

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**Question 11:** Do you agree with our proposal regarding access to sort codes? If not, please provide evidence to support your response.

Yes

**Question 12:** Do you agree with our proposal regarding access to settlement accounts? If not, please provide evidence to support your response.

Yes

**Question 13a:** Do you agree with the proposal regarding aggregator access models? If not, please provide evidence to support your response?

Yes

**Question 13b:** How can the development of more commercial and competitive access solutions like aggregators be encouraged to drive down costs and complexity for PSPs?

**Question 14:** Do you agree with our proposal regarding Common Payment System Operator participation models and rules? If not, please provide evidence to support your response.

Yes

**Question 15a:** Do you agree this proposal regarding establishing a single entity? If not, please provide evidence to support your response.

Yes

**Question 15b:** If you do not agree, how else could the benefits be achieved without consolidating PSO governance in the way described?

**Question 16:** Do you agree with the proposal to move the UK to a modern payments message standard? If not, please provide evidence to support your response.

Yes



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**Question 17a:** Do you agree with the proposal to develop indirect access liability guidance? If not, please provide evidence to support your response?

Yes.

As of now there is a considerable degree of apprehension among Banks towards non-bank payment service providers on account diverse, nonstandard and subjective risk perceptions. A comprehensive access liability guidance is of significant advantage

**Question 17b:** What, in your view, would prevent this guidance being produced or having the desired impact?

The following points will prevent the guidance getting the desired impact

- a) It becoming too subjective and discretionary
- b) Banks (providers) hang over with the current scenario
- c) Too cagy approach by Banks
- d) Cost of administering the guidance

**Question 17c:** In your view, which entity or entities should lead on this?

British Bankers Association with subject matter experts drawn from diverse Payment system providers

## QUESTIONS IN RELATION TO SECTION 8 | A NEW ARCHITECTURE FOR PAYMENTS

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**Question 18a:** Do you agree with the proposal for a co-ordinated approach to developing the various types of APIs? If not, please provide evidence to support your response?

No specific comments

**Question 18b:** What are the benefits of taking a co-ordinated approach to developing the various types of APIs? What might be the disadvantages of taking this approach?

**Question 18c:** How should the implementation approach be structured to optimise the outcomes?

**Question 19a:** Do you agree with our proposal to create a Simplified Delivery Mechanism? If not, please provide evidence to support your response?

Yes

**Question 19b:** Should the new consolidated entity be responsible for leading the development of the new rules/scheme or should a new body be given this responsibility?

Yes

**Question 19c:** Could an existing scheme adapt to provide the Simplified Delivery Mechanism or should a new one be developed?

Recommend a new development

**Question 19d:** Would it be better for the processing and clearing functions of the simplified framework to be built on distributed architecture or a centralised infrastructure? Could there be a transition from a centralised structure to a distributed structure over time?

Distributed architecture

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**Question 19e:** Do you think it is feasible to begin work to design a new payments infrastructure given existing demands on resources and funding?

Yes

**Question 20a:** Do you agree that the existing arrangement of the payments system in the UK needs to change to support more competition and agility?

Yes

**Question 20b:** Will the package of proposals we suggest, the Simplified Payments Platform, deliver the benefits we have outlined? What alternatives could there be?

Yes

**QUESTIONS IN RELATION TO SECTION 9 | OUR STRATEGY IN SEQUENCE**

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**Question 21a:** Do you agree with this proposed sequence of solutions and approach outlined to further clarify this?

Yes

**Question 21b:** If not, what approach would you take to sequencing to bring forward the anticipated benefits, in particular for end users?

## QUESTIONS IN RELATION TO SECTION 10 | IMPLEMENTATION APPROACH

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**Question 22a:** What approach should be taken to deliver the implementation of the Forum's Strategy?

No specific suggestions

**Question 22b:** Who should oversee the implementation of the Forum's Strategy?

A new body/trade association to be formed with all Payment service providers

**Question 22c:** What economic model(s) would ensure delivery of the Strategy recommendations?

Non profit mutual

**QUESTIONS IN RELATION TO SECTION 11 | COST BENEFIT ANALYSIS APPROACH**

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**Question 23a:** Do you agree with the proposed approach for quantifying the potential costs and benefits of the proposed solutions?

Yes

**Question 23b:** Do you agree with the costs and benefits drivers outlined in this document?

Yes

**Question 23c:** We would appreciate any information on the potential costs and benefits you may have to assist our analysis.

No suggestions