Consultation Questionnaire

This template is intended to help stakeholders respond to the questions set out in our consultation document and in its supporting papers.

Responses should be emailed to us at Forum@psr.org.uk in PDF format by no later than **22 September 2017**. Any questions about our consultation can also be sent to Forum@psr.org.uk

Whilst we welcome feedback from any participant on any question, not all questions in this consultation will be relevant to the wide range of stakeholders in the Payments Community. We have sign posted the questions to clarify which are most relevant for your organisations, and where we would most value your feedback.

Thank you in advance for your contribution to this consultation process.

Basic Details

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Responding to the consultation and publication of responses

Subject to express requests for confidentiality, please note that we will publish views or submissions in full or in part. In responding, we therefore ask you to minimise elements of your submissions which you want to be treated as confidential. Where you do submit both confidential and non-confidential material, you should submit a non-confidential version, which you consent for us to publish, marked 'for publication' and another version marked 'confidential'.

In responding to this consultation, you are sharing your response with the Forum secretariat (1). Confidential information provided in these circumstances is confidential within the meaning of FSBRA and it is a criminal offence to disclose it without requisite authority (2).

Notes:

(1) The Forum secretariat work for the Payment Systems Regulator Limited, 'the PSR', and are considered primary recipients for the purposes of the Financial Services (Banking Reform) Act 2013 (FSBRA).

(2) The PSR has the power to disclose confidential information in certain circumstances for the purposes of facilitating its functions and may impose conditions on the use of that information.

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 'confidential'.

Insert name here

1.0 A New Payments Architecture

Question 1.1

Consumers PSPs Corporates Govt. Vendors

Do you agree with our recommendation to move towards a 'push' payment mechanism for all payment types?

Yes ◯ No ◉

If not, please explain why.

Concerns around customer behavior and the administration and workload for the customer. 80% DD penetration at present via one point of interaction at sign up. If push mechanism can deliver same levels of customer effort as current pull methods we would be happy to support

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Question 1.2

PSPs Vendors

In the proposed transition approach it is expected that Third Party Service Providers including current independent software providers, bureaux and gateway providers will update their systems to enable existing payment formats to continue to operate with no or limited negative impact on the current users of services such as Direct Debit.

As a PSP or TPSP, do you agree we have identified the implications of adopting a push model adequately?

Yes ◯ No ◯

If not, please set out any additional impacts that need to be considered.

Potential TSO (IT) involvement. Will need to change internal PSP infrastructure and links to ensure compliance with the new requirements. Use of translation services to map existing DD output files to NPA files, and vice versa, to minimise impact on existing billing systems

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Question 1.3

Consumers PSPs Corporates Govt. Vendors SMEs

As a potential vendor, participant or user of the NPA, are there any other design considerations that should be included in the NPA, especially with regards to considering the needs of end-users?

Yes ◉ No ◯

If yes, please provide a description of those areas and why they are important to explore.

Commercial needs of the merchant need to be included, could drive up the cost of payment, negatively impacting the customer. More of an effect on the most vulnerable customers.

Question 1.4 PSPs Vendors

The nature of the layering approach enables new components to be added or updated with minimal impact on components in other layers. We believe this will support greater levels of competition and innovation especially in the upper layers of the NPA.

In your view, as a vendor or service provider, will layering the NPA in this way simplify access and improve your ability to compete in the UK payments market?

Yes (●) No ( )

If not, please explain why.

BT/EE to provide network layer or aspects of it? Internal PSP to support JSON calls to Clearing layer (but not necessarily from customers to it so can retain existing exposure).

Question 1.5 PSPs Vendors

With the recommended centralised clearing and settlement option, as a participant or vendor who is accessing or delivering the clearing and settlement service, do you think:

a. We have reached the right conclusion in recommending this option?

Yes (●) No ( )

If not, please explain why.

b. The right balance of managing risk versus competition has been achieved?

Yes (●) No ( )

If not, please explain why.

Question 1.6 PSPs Vendors

Do you agree with our analysis of each of the clearing and settlement deployment approaches?

Yes (●) No ( )

Which is your preferred deployment approach?

Single settlement preferred

Question 1.7 PSPs Vendors

As a vendor of services in any layer of the NPA, do you think that more work is required to prove any of the main concepts of NPA before embarking on the procurement process?

Yes ◯ No ◯

If so, please explain which areas and why.

2.0 Collaborative Requirements and Rules for the three End-User Solutions

Question 2.1 Corporates Govt. SMEs

As a payee,

a. Does your organisation serve customers who experience challenges paying regular bills?

Yes ◉ No ◯

b. Does your organisation experience unpaid direct debits?

Yes ◉ No ◯

Please comment on the extent to which you experience this and any trends you see in this area.

New customers, repeat offenders, vulnerable customers. Provide the biggest challenge to regular bill payment. On DD we do experience 1% failure on the customer base of 16m. Proportionally the payment failure is lower on DD than for none automatic payment methods

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Question 2.2 Corporates Govt. SMEs

Request to Pay provides visibility to payees on the intentions of a payer. Would the increased visibility benefit your business?

Yes ◯ No ◉

If so, how?

System changes required to manage the customers who do not pay in full. Significant number of customers pay not respond or give incorrect information which will mean extra workload for the business. We have no method of managing these customers at present. Once the systems are updated then seeing the payer intentions could be beneficial. Batching of customer base to

Question 2.3 Corporates Govt. SMEs

Request to Pay will result in increased communication between the payee and the payer. As a payee:

a. Would the increased communication present a challenge?

Yes ◉ No ○

If so, in what way?

see previous answer although if systems, controls, processes are built in line with the request to pay then there could be a benefit.

b. What benefits could you envisage from this increased communication?

potentially some vulnerable customers who would benefit from the increased messages. Could be an acceleration on resolving some customers payment challenges.

c. Do you see any additional potential benefits resulting from Request to Pay other than those described?

Yes ◉ No ○

If so, which ones?

Group of decent customers who always pay late. Request to pay would help this group as they could manage their payment without calling the business or the business calling them.

Question 2.4 Corporates Govt. SMEs

We have recommended the minimum information that should be contained in a Request to Pay message. As a payee:

a. With the exception of reference ID, are you able to provide other items of information with every payment request?

Yes ◉ No ○

However is we were to provide this information where an account is settled by someone other than the customer is there a DPA consideration? Point re: cost/incentive of payment - we would not want to share this as commercially sensitive.

b. Is there additional information, specific to your business, that you would have to provide to payers as part of the Request to Pay message?

Yes ◉ No ○

Other services that may be due for payment in the near future. Charges for follow up and restrictions.

Question 2.5 Corporates Govt. SMEs

We envisage payees stipulating a payment period during which the payer will be required to make the payment. As a payee, how do you think this payment period might be applied within your organisation?

Yes. Start point of the period will need to be defined. Point of sending, receiving, responding. Payment terms to be advised.

Question 2.6 Corporates Govt. SMEs

Request to Pay will offer payers flexibility over payment time as well as amount and method. As a payee:

a. Does your business model support offering payment plans and the ability for payers to spread their payments?

Yes ◉ No ○

If so, please provide more details as to how these plans are offered, their conditions and to which customers.

Not to the extent of flexibility needed against NPA requirements. Affordability issues are addressed by a change of product (PAYM to PAYG) or downgrading services

b. Do you have a predominant payment method used by your payers?

Yes ◉ No ○

If so, what percentage of customers use it?

80% DD

c. Do you offer your payers a choice of payment methods?

Yes ◉ No ○

If yes, what determines how much choice you offer? If not, what are the barriers preventing you from doing this?

Cost of payment method, internal system functionality, customer experience and convenience.

d. Are there any incentives to use one payment method over another?

Yes ◉ No ○

If so, what is the rationale?

Driven by payment costings including cost to serve

Question 2.7 Corporates Govt. SMEs

A minority of payers may not be able to pay within the payment period. Through Request to Pay they will be able to request an extension to the payment period. As a payee:

a. Do you currently offer your payers the capability to extend a payment period, request a payment holiday or make late payments?

Yes ◉ No ○

when would any penalty charges for late payment be applied in the process. Plus any charges for restoration of service.

b. What are the conditions and eligibility criteria under which this is offered?

complex rule set, however generally driven by risk which would negate use of request to pay.

c. If you currently don't, what are the barriers preventing you from offering this capability?

Question 2.8 Corporates Govt. SMEs

Request to Pay will offer payers the option to decline a request. The purpose of this option is to provide an immediate alert in case the request was received as an error or will be paid by other means. As a payee:

a. Would you find this information useful?

Yes ◉ No ○

Decline payment request should only be available where there is a concern regarding fraud. concerns on customers not responding to request for payment and thus no knowing if payment will be made, how do we follow up these? Customers may have intention to pay but not send the acknowledgement; we could be having difficult conversations with good payers

b. Do you have any concerns about providing this capability?

Yes ◉ No ○

Work created from providing this functionality will be significantly more than the work to chase current none payers that do not tell us.

Question 2.9

Consumers Corporates SMEs

Does the Request to Pay service as described address:

a. The detriments identified in our Strategy?

Yes ○ No ◉

the request to pay capability is well described however without being integrated into the business these benefits can be realised. Customers blocking payment - what happens next?

b. The challenges experienced by your customers? Does it introduce any new challenges?

Yes ◉ No ○

Does it introduce any new challenges?

previously answered plus cash flow reduction e.g. failure rate on DD is 1%. 10% of the request to pay my defer.

Question 2.10

Corporates Govt. SMEs

As a payee, considering the information provided in this document,

a. What is the extent of change you think you will need to carry out internally to offer Request to Pay?

Massive IT infrastructure changes required before any benefits could be realised.

b. What challenges do you see that might prevent your organisation adopting Request to Pay?

Cost and business case priority

c. What is the timeframe you think you will need to be able to offer Request to Pay?

5 years minimum, 3 year road map determined

Question 2.11

Corporates Govt. SMEs

What are the features or rules that could be built into Request to Pay that would make it more valuable to your organisation, or more likely for you to adopt it?

Build in extra validation (3D secure style). Ability to opt out of request to pay to auto payment for a customer.

Question 2.12

Consumers PSPs Corporates Govt. Vendors SMEs

We have highlighted several risks and considerations relevant to the delivery of Request to Pay. As an end-user of Request to Pay:

a. Are there any risks that we have not addressed or highlighted that would like to add?

Yes ○ No ◉

see above plus habitual abuse to delay payments

b. Are there additional unintended consequences that we should consider?

Yes ◉ No ○

Customer that would benefit most would be excluded due to their risk rating. No consideration for payment costs.

Question 2.13

Consumers PSPs Corporates Govt. Vendors SMEs

We recognise that additional work needs to be done in identifying potential safeguards including liability considerations associated with Request to Pay. As an end-user of Request to Pay:

a. What are some of the potential liability concerns that you may have?

any VAT implications?

b. Would you be interested in working with the Forum to define, at a high level, the liability considerations for Request to Pay?

Yes ◉ No ○

If so, please contact us as soon as convenient through the Forum website so we can get you involved.

already progressing

Question 2.14 PSPs

As a PSP:

Do you currently offer real-time balance information to your clients?

Yes ○ No ◉

What information do you offer them? If not, what are the constraints?

Question 2.15 Consumers PSPs Corporates SMEs

We have presented two CoP response approaches (Approach 1 and Approach 2).

a. As a payer, what would be your preferred approach? Why?

approach 1 - more simple, fewer DPA considerations with the option to get more information if required also no payer details being returned which require protection/encryption/etc.

b. As a PSP, what would be your preferred approach? Why?

c. As a regulator,

I. What are applicable considerations that must be made for each approach?

II. What safeguards must be put in place for each approach?

DPA

Question 2.16 PSPs

As a PSP:

a. Would you be able to offer CoP as described to your customers?

Yes ◯ No ◯

b. What is the extent of change that you would need to carry out internally to offer CoP?

Question 2.17 PSPs

The successful delivery of CoP is largely dependent on universal acceptance by all PSPs to provide payee information. As a PSP:

a. Would you participate in a CoP service?

Yes ◯ No ◯

b. Are there any constraints that would hinder you providing this service?

Yes ◯ No ◯

Question 2.18 PSPs

The NPA will fully support the functionality for PSPs to provide payment status and tracking.

a. As a PSP, what is the extent of change you think you will need to carry out internally to offer Payments Status Tracking?

Possible timing issue between payment information and merchant information where payment is made and not updated on customer system. e.g. card payment of bill in post office.

b. What challenges do you see that might prevent your organisation adopting Payments Status Tracking?

Question 2.19

Consumers PSPs Corporates Govt. SMEs

We have highlighted several considerations relevant to the delivery of Assurance Data. As an end-user of Assurance Data:

a. Are there any risks that we have not addressed or highlighted that you would like to add?

Yes ○ No ◉

b. Are there any unintended consequences that we should consider?

Yes ○ No ◉

Question 2.20

Consumers PSPs Corporates Govt. SMEs

As a payer:

a. How would you use Enhanced Data?

better allocation, defend DDIC, chargebacks, improved management information and analysis

b. What Enhanced Data would you add to payments?

Question 2.21

Corporates Govt. SMEs

As a payee:

a. How would you use Enhanced Data?

b. What Enhanced Data would you add to payments?

Question 2.22

Consumers PSPs Corporates Govt.

Does the Enhanced Data capability as described address the detriments identified in our Strategy?

Yes (●) No ( )

What about when a customer has a query with their bill? Will customers be able to see itemized calls? Could we consider onebills due to the size of the data or would this be linked to analyst converge or similar. What about companies who have an approval process with several approvers required before payment? Could our bills be intercepted by a malicious third party?

Question 2.23

Consumers PSPs Corporates Govt.

Some changes will be required to enable the loading and retrieval of Enhanced Data. For example, corporates will need to modify their internal systems. As an end-user, what internal change will be needed to allow you to add and receive Enhanced Data through the NPA?

Dependent on solution provided. Significant system development will be required depending on the complexity of customer remittance. A business case to delivery those enhancements would need to compete for internal funding, unless funded by the payment industry

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Question 2.24

Consumers PSPs Corporates Govt. SMEs

We have highlighted several considerations relevant to the delivery of Enhanced Data. As an end-user of Enhanced Data:

a. Are there any risks that we have not addressed or highlighted that you would like to add?

Yes ( ) No (●)

Data integrity key

b. Are there any unintended consequences that we should consider?

Yes (●) No ( )

Business systems and processes dealing with the extra size of the data transmitted which may impact speed of processing.

Question 2.25 Consumers PSPs Corporates Govt. SMEs

We recognise that additional work needs to be done in identifying safeguards including liability considerations associated with Enhanced Data. As an end-user of Enhanced Data:

a. What are some of the liability concerns that you may have?

Responsibility for data loss/breach. 3rd parties involved in the process.

b. Would you be interested in working with the Forum to define, at a high-level, the various liability considerations required for Enhanced Data?

Yes ○ No ◉

If so, please contact us as soon as convenient through the Forum website so we can get you involved.

3.0 Implementation Plan

Question 3.1 Consumers PSPs Corporates Govt. Vendors SMEs

Are there any additional principles you think we should add or significant amendments that should be made to those already stated?

Yes ◉ No ○

Should consider merchant profitability and cost of changes required. "If it's not broken then don't change it"

Question 3.2 Consumers PSPs Corporates Govt. Vendors SMEs

Are there any additional assumptions you think we should add or significant amendments that should be made to those already stated?

Yes ◉ No ○

Other business priorities may impact on delivery time lines. Time lines to be agreed by a merchant representation group.

Question 3.3

PSPs Corporates Govt. Vendors SMEs

Do you agree with the sequence of events laid out in the implementation plan?

Yes (●) No ( )

If not, what approach to sequencing would you suggest?

Question 3.4

PSPs Corporates Govt. Vendors SMEs

Do you agree with the high-level timetable laid out in the implementation plan?

Yes (●) No ( )

If not, what timing would you suggest?

Question 3.5

PSPs Corporates Govt. Vendors SMEs

Are there any significant potential risks that you think the implementation plan does not consider?

Yes (●) No ( )

If the answer is yes, then please provide input about what they are and how we can best address them.

Significant technology changes for merchants. Impact on change for customer base, already a changing landscape and this is an extra, significant, change.

Question 3.6

PSPs Corporates Govt. Vendors SMEs

Do you agree with our proposed transition approach?

Yes (●) No ( )

If not, please provide your reasoning.

4.0 Cost Benefit Analysis of the NPA

Question 4.1

PSPs Corporates Govt. Vendors SMEs Investors

Are there any material quantifiable benefits that have not been included?

Yes ○ No ◉

If so, please provide details.

Question 4.2

PSPs Corporates Govt. Vendors SMEs Investors

Do you agree with the cost assumptions with regards to the NPA and each of the overlay services (Request to Pay, Enhanced Data, Assurance Data)?

Yes ○ No ◉

If not, please state your reasons and, if possible, suggest alternatives analysis.

Question 4.3

PSPs Corporates Govt. Vendors SMEs Investors

Do you agree with our description of the alternative minimum upgrade?

Yes ○ No ◉

If not, please explain your reasoning.

Over an 8 year period the business landscape and supplier will be significantly different from what we see now.

5.0 NPA Commercial Approach and Economic Models

Question 5.1 PSPs Vendors

Does our competition framework adequately capture the types of competition that may exist in payments?

Yes ◯ No ◯

Please explain.

Question 5.2 PSPs Vendors

Do you agree with the NPA competition categories described? If not, please explain why.

Yes ◯ No ◯

Question 5.3 Vendors

Does our framework capture the dynamic roles the NPSO may play in the market?

Yes ◯ No ◯

Question 5.4 PSPs Vendors Investors

Are there any other important criteria that we should use to assess the funding options we have identified?

Yes ◯ No ◯

Question 5.5 Investors

Do you agree with our NPA competition assessment? If not, please explain why.

Yes ◯ No ◯

Question 5.6 PSPs Vendors Investors

Do you agree with our assessment of End-User Needs Solutions? If not, please explain why.

Yes ◯ No ◯

Question 5.7 PSPs Vendors Investors

Do you agree with our list of funding stakeholders? If not, please explain why.

Yes ◯ No ◯

Question 5.8 PSPs Corporates Vendors

Are there other significant sources of funding or types of funding instruments the NSPO could secure that have not been described? If not please explain why.

Yes ◯ No ◉

6.0 Improving Trust in Payments

Question 6.1

PSPs Corporates Vendors

Do you agree with the outlined participant categories identified for the Payments Transaction Data Sharing and Data Analytics strategic solution?

Yes ◯ No ◉

Are there other categories that should be considered for inclusion?

Yes ◯ No ◉

Please explain your response.

Question 6.2

PSPs Corporates Vendors

What is your opinion on the role non-payments industry participants should have as part of the Payments Transaction Data Sharing and Data Analytics strategic solution? (This could include Government, Law Enforcement, or others). If appropriate, please outline usage of the system, provision of data to the system, and legal considerations for participation.

Question 6.3

PSPs Corporates Vendors

Do you agree with the potential use cases outlined for the Payments Transaction Data Sharing and Data Analytics strategic solution?

Yes ◯ No ◉

If not, please provide your reasoning. Please indicate if there are other potential uses for the system that should be considered.

Question 6.4 PSPs Corporates Vendors

Do you agree with key principles we have outlined for the implementation of the Payments Transaction Data Sharing and Data Analytics strategic solution?

Question 6.5 PSPs Corporates SMEs Vendors

Other than those already listed, what stakeholders should be consulted and engaged during the design and implementation of the Payments Transaction Data Sharing and Data Analytics Strategic Solution?

Credit bureaus? other closed user groups for fraud, insights (equifax), CAIS (experian)

Question 6.6 PSPs Corporates Vendors

Do you agree with the high-level timeline for the Payments Transaction Data Sharing and Data Analytics strategic solution?

Yes ◉ No ○

If not, what timing would you suggest and why?

Question 6.7 PSPs Corporates SMEs Vendors

Do you agree with the establishment of the recommended framework for the sharing and exchanging of a core set of SME customer data overseen by a governance body?

Yes ◉ No ○

If not, please explain your reasoning.

Question 6.8 PSPs Corporates

We are keen to get your input on the benefits provided by the framework.

a. Do you agree that the focus on sharing a core set of SME customer data is beneficial for the KYC processes in your organisation?

Yes ◉ No ○

If not, please explain your reasoning.

b. Which other business activities could be supported by / benefit from the described sharing and exchanging a core set of SME customer data?

Could help with omni channel approach with enhanced KYC data.

Question 6.9 PSPs Corporates SMEs Vendors

Do you agree that the topics covered by the standards will provide sufficient guidance in order to implement the data sharing framework without being too prescriptive?

Yes ◉ No ○

Are there additional topics you believe should be included?

Question 6.10 PSPs Corporates SMEs Vendors

To engender trust in the sharing and exchanging of a core set of SME customer data, are there other responsibilities you would expect the governance body to have oversight over?

conflict of interest clauses

Question 6.11 PSPs Corporates SMEs Vendors

In your view, do any existing bodies (industry or other), already perform this oversight role?

Yes ◯ No ◯

If not, is there an existing body you believe should perform this role, or would you expect a new body to be established?

Partially. CAIS, insight, closed user groups.

Question 6.12 PSPs Vendors

Do you think a temporary testing environment as described is the right approach? If not, please explain your reasoning.

Yes ◉ No ◯

Question 6.13 PSPs Vendors

Are there any other key features you would expect in the temporary testing environment?

Yes ◯ No ◉

Question 6.14 Vendors

Do you agree that value-added service providers would benefit from the data sharing environment enabled by the framework?

Yes ◉ No ◯

Question 6.15 PSPs Corporates

Are the arguments put forward compelling enough to encourage net data providers to engage?

Yes ◯ No ◯

If not, please provide examples of what else would be required to make them participate.

Question 6.16 PSPs Corporates

Do you see other advantages or challenges for net data consumers that were not listed above?

Yes ◉ No ◯

Please explain your answer.

KYC data could accelerate validation and order progress if it could be used in these applications.

Question 6.17 PSPs Corporates SMEs Vendors

Do you agree with the high-level implementation timeline for the Trusted KYC Data Sharing solution?

Yes ◉ No ◯

If not, what timing would you suggest and why?

Question 6.18 PSPs Corporates SMEs Vendors

Are there other initiatives with a similar focus that should be considered in order to deliver the Trusted KYC Data Sharing solution?

Save Questionnaire*

* Please save your questionnaire and email to us at Forum@psr.org.uk in PDF format by no later than **22 September 2017**.