

Consultation paper

Reporting guidance

APP scams Measure 1:
Data collection and
publication

February 2023

We welcome your views on this consultation. If you would like to provide comments, please send these to us by **5pm on 23 February 2023**.

You can email your comments to **appscamsdata@psr.org.uk** or write to us at:

App Scams Team
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London E20 1JN

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www.psr.org.uk/publications/consultations/cp23-1-app-scams

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1 Executive summary

Summary

- 1.1** We are consulting on guidance for payment service providers (PSPs) that will have to publish data on their performance on authorised push payment (APP) scams. This will be a requirement of the specific direction that we plan to publish in March 2023.
- 1.2** APP scams are a major problem in the UK. We want to prevent APP scams happening in the first place and also protect people who do fall victim to them.
- 1.3** As part of a wider package of measures, we will require certain PSPs to report data to us and to publish comparative performance data on their handling of APP scams. We intend to publish the guidance at the same time as when we give our direction.
- 1.4** We will review our guidance at least every six months, updating it, when necessary, in line with each half-year reporting period.
- 1.5** We are seeking stakeholders' views on the draft guidance. We are also seeking views on the reporting template.
- 1.6** Directed participants and the PSR will initially publish the following three metrics:
- **Metric A:** The proportion of APP scammed customers who are left – fully or partially – out of pocket.
 - **Metric B:** Sending PSPs' APP scam rates, as a measure of fraud incidence at the PSP.
 - **Metric C:** Receiving PSPs' APP scam rates, net of recoveries.
- 1.7** This information will help consumers assess each PSP's performance on APP scams.
- 1.8** We are preparing this guidance to help PSPs provide us with the correct data and any additional information that we may need. A key part of this is ensuring that PSPs are consistent in the reporting of the data. We also want to answer the questions and concerns that PSPs have raised with us so far.
- 1.9** The guidance will also be a key reference point for chief financial officers or equivalent level senior executives of PSPs who need to provide us with assurance over their data via a signed statement.
- 1.10** We welcome your views on the draft reporting guidance and draft reporting template.
- 1.11** **Please provide your comments to us by 23 February 2023.**

Draft guidance

2 Introduction

Summary

- We set out the background to our data collection policy under Measure 1 of the November 2021 consultation.
 - We summarise the stakeholder engagement that we have undertaken since then and which has contributed to developing this guidance.
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Background

- 2.1** Authorised push payment (APP) scams are a major problem in the UK. We want to prevent APP scams happening in the first place and also protect people who fall victim to them.
- 2.2** We want PSPs to publish performance data on APP scams, to better inform consumers and to place reputational incentives on PSPs to improve their performance.
- 2.3** Specific Direction [XX] sets out our data collection and publication requirements for the 14 sending PSPs that we have directed.
- 2.4** There are three metrics, A, B and C, for which data will be collected:
- **Metric A:** The proportion of APP scammed customers who are left – fully or partially – out of pocket.
 - **Metric B:** Sending PSPs' APP scam rates.
 - **Metric C:** Receiving PSPs' APP scam rates, net of recoveries. Those comparisons will also include the wider set of receiving PSPs to whom the directed PSPs send payments.

Stakeholder engagement

- 2.5** Since our November 2021 consultation¹, we have engaged with stakeholders in the following ways:
1. **March 2022:** We circulated draft trial data-collection materials for comment.
 2. **March 2022:** A stakeholder meeting to discuss the comments we received.
 3. **June 2022:** A voluntary trial with seven participants.
 4. **July 2022:** A stakeholder meeting to discuss the results of the trial.

¹ CP21/10, [Authorised push payment \(APP\) scams](#) (November 2021).

5. **August 2022:** We circulated draft guidance, and an updated template on reimbursements and recoveries.²
6. **November 2022:** A stakeholder meeting to discuss a short consultation on a new process for Metric C.
7. **November 2022:** We circulated a new working draft of the reporting guidance and the template to stakeholders.
8. **December 2022:** We reconsulted on a new approach to the Metric C process.³
9. **February 2023:** We published a consultation on this reporting guidance and template.
10. **March 2023:** We published our policy statement on Measure 1, along with the final version of the reporting guidance and template.

2.6 Since November 2021, we have also engaged with individual PSPs and trade bodies (including UK Finance and Innovate Finance) on specific issues as they have arisen.

2.7 We have updated our reporting guidance and reporting template in line with the comments and suggestions we received.

² This had been an area of difficulty in the trial and, given its importance to Metrics A and C, we wanted to establish clarity. It was intended that this guidance would be a subset of the full guidance and we have incorporated it into this document.

³ CP22/5, [Authorised push payment scams: Measure 1. Metric C process: revised approach](#) (December 2022).

3 Objective and principles

Summary

- This chapter sets out the overarching objective and principles for reporting and publication of APP scam data by PSPs.
 - In making choices about how to report, directed participants should firstly seek to achieve the objective, and secondly follow the principles set out in this section.
 - PSPs should provide accompanying explanations, commentary, and details of any departures.
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Objective

3.1 PSR policy objective. The outcome that we are seeking from the reporting and publication of APP scam data is a reduction in APP scam losses incurred by consumers, both through preventing scams and ensuring that consumers are appropriately reimbursed. We expect this to be achieved mainly through two mechanisms:

- Consumer choice of PSP and switching between them.
- Reputational incentives on payment service providers (PSPs) through key stakeholders including journalists, consumer groups, the government and investors.

3.2 PSP objective. The purpose of a PSP reporting and publishing APP scam data is to make clear, accessible and comparable data about individual PSP APP scam performance available to consumers and other stakeholders. The reporting and publication of such data should be in such a manner as to support our policy objective.

Principles

3.3 PSPs should follow the principles below when collecting, preparing, reporting and publishing the APP scam data. These principles should be followed in the order of priority set out below.

1. **Achieving the objective:** A PSP's reporting of and publication of APP scam data should aim to achieve the objective.
2. **Objectivity:** The basis of reporting should be a robust methodology that aims to provide a realistic representation of the performance of a PSP in relation to APP scams and does not favour a particular outcome or conclusion.
3. **Completeness:** All relevant transactions and data should be reported. We do not expect to see that certain periods of data have been excluded for any reason – for example, due to the presence of significant outliers. Instead, we expect to see the entirety of available data, with explanations for any anomalies.
4. **Accuracy:** All relevant transactions and data should be accurately reported.

5. **Comparability between PSPs and consistency between reporting periods:** Consistency between PSPs regarding their basis of reporting and publication should facilitate comparisons of their performance with other PSPs. As far as possible, the basis of preparation should remain the same over time. Exceptionally, where the basis of preparation has been changed (versus the one used in the previous period), the nature of the change should be clearly explained and the reason for the change justified. The PSP should also estimate the impact of this change on the results for the current period (by comparing results on the old and new bases), with confidence levels in this estimate.
6. **Fairly represents:** The reporting and publication of APP scam data should fairly represent the performance of the PSP.
7. **Transparency:** The methodology used should be readily available to us and easily explained.
8. **Materiality:** The standard for judgements concerning the appropriate precision of reporting, the inclusion or exclusion of data, the use of suitable estimates, the disclosure of any concerns and any other reporting issue should be whether it would affect the views of the users of Metrics A, B and C and any interpretations or conclusions that they might draw from the results.

Accompanying explanations

- 3.4 PSPs should summarise and describe the basis of their preparation and any assumptions that they have made.
- 3.5 PSPs may also provide a commentary to us on the main themes of their results and variations with the previous period. This could assist us in understanding their results. However, this commentary would not be published by us.
- 3.6 Where PSPs have concerns about the application of the guidance to their data, they should note and explain these.
- 3.7 Where the objective and the principles conflict or there is a conflict between the different principles, and PSPs have had to apply the hierarchy to resolve this, they should note and explain their decision.
- 3.8 Where PSPs have chosen to depart from the objective, principles or other aspects of the guidance, they should note and explain their decision. And they should provide an estimate of the impact, together with an indication of their confidence level in this estimate.
- 3.9 Where PSPs are unable to provide an element of the data or there is uncertainty about the quality of the data, they should note and explain this. And provide an estimate of the impact of this omission or uncertainty, together with an indication of their confidence level in this estimate. However, we would expect such instances to be rare and usually not material.
- 3.10 PSPs should contact us, in writing, at the earliest opportunity, should they anticipate that they might have difficulty implementing any part of the reporting guidance or may need to depart from it, along with proposals to mitigate this.

Future updates

- 3.11** We may update the guidance from time to time. Any guidance that we issue may contain additional requirements and may require further information to be reported. We intend to publish any revisions to this guidance and the reporting template in time for the next reporting cycle. If there are no changes required, we will simply confirm this to stakeholders.
- 3.12** Our proposals in relation to the mandatory reimbursement of APP scam victims, under Measure 3 of our package to combat APP scams, may require development of a validation process between sending and receiving PSPs. Under our Measure 3 proposals, the liability split between sending and receiving PSPs will necessitate information exchange between sending PSPs and receiving PSPs when an APP fraud happens, which will reduce this asymmetry of data. Monitoring of the outcomes of Measure 3 will also be required, which may also draw on such data. It may be necessary to build systems to achieve this and with the possible involvement of a central organisation in coordination. We continue to discuss this with Pay.UK and industry.
- 3.13** The publication of relevant metrics under Measure 1 will continue, even after Measure 3 is in place. We expect that there will be a continued need for Measure 1, even after Measure 3 has come into effect. Measure 1 places reputational incentives on PSPs to improve their fraud detection and prevention, as well as recovery and repatriation, even in the presence of mandatory reimbursement. In addition, we think it is likely that Measure 1 will serve as a way of monitoring the outcomes of the Measure 3 policy.
- 3.14** The validation process for Metric C that we have set out in the policy statement and specific direction will be transitional. If a full validation process has been put in place under Measure 3, this may later replace the current validation process for Metric C.

4 Existing guidance

- Directed participants should follow the guidance in the order shown. If you encounter any conflicts, use the hierarchy of principles to resolve them.
 - The specific direction is a legal obligation, which we can enforce via investigation and sanction, if necessary. The guidance is complementary but advisory.
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Specific direction

4.1 The specific direction sets out the requirements regarding the reporting and publication of APP scam data. It includes the following:

- Scope (paragraph 3.1).
- Requirements for preparing and publishing information (paragraphs 3.2 and 3.4).
- Key definitions (section 4).
- Further definitions (section 15 – Interpretation).

[Above references are based on draft direction. To be updated when Specific Direction is drafted].

Reporting guidance

4.2 The reporting guidance is intended to set out requirements in detail and to supplement the Specific Direction. It will also be updated regularly as new issues arise.

The policy statement and consultation

4.3 The policy statement may provide context, further explanation and further information. The earlier consultations (November 2021 and December 2022) may also be informative in this respect. However, the policy statement supersedes the consultations and so takes precedence, particularly where policy and requirements have changed. These documents set out the objectives and background to this policy in more detail, as well as the policy decisions that we have made on the various issues that have arisen through our stakeholder engagement. These documents should help with interpretation and application of the reporting guidance.

Further observations

UK Finance – form completion guidelines

- 4.4** UK Finance collects, aggregates and publishes, on behalf of its members, industry fraud reporting (relating to authorised push payments), which it publishes annually under the title of *Fraud - The Facts*, together with a six-monthly half-year update. In support of this data gathering process, it issues (but does not publish) to its participating members, periodically, a template and a form completion guideline:
- *Authorised Push Payment – Monthly Reporting Definitions & Reporting Metrics*.
 - *Excel template: AUTHORISED PUSH PAYMENT SCAMS – BY SCAM TYPE*.
- 4.5** However, the purpose and outputs of our data collection differ from those of UK Finance. And we have observed that there are several different approaches to reporting being followed by different UK Finance members. This makes it difficult for us to specify a single approach that will both provide what we need and also work for all PSPs, based on the UK Finance reporting.
- 4.6** Therefore, we have defined our own specific requirements and terms in certain key areas – for example, around reporting reimbursements and recoveries. (See Chapter 5 and 6 for more detail.)
- 4.7** To achieve clarity, we have set out all the requirements here in our reporting guidance, rather than relying upon further guidance from UK Finance. Where necessary, we have simply repeated material from the UK Finance guidance – for example, in the definition of the categories of APP scams (see paragraph 5.14).

The trial

- 4.8** In June 2022, we undertook a trial of reporting APP scam data with seven participants, with the participants providing data from 2021. During this trial, we engaged with stakeholders and provided guidance on how the reporting should be completed.
- 4.9** However, since the trial, we have reviewed feedback received and made several changes to our approach, which are reflected in this document. Therefore, the content in this document supersedes any instruction given during the trial period.

Previous engagement on the reporting of recoveries and reimbursement

- 4.10** On 15 August 2022, we circulated one element of draft reporting guidance for stakeholder review.
- 4.11** This guidance related specifically to the reporting of recoveries and reimbursement for Metrics A and C, which required additional clarification ahead of the publication of the full reporting guidance.
- 4.12** Relevant parts of that guidance have been incorporated into the information in Chapter 5 of this document, under the heading *Reimbursements and recoveries* and have been amended to reflect comments received from stakeholders.

- 4.13** The content previously circulated is superseded by the content set out in this document.

Stakeholder engagement

- 4.14** We have engaged with several stakeholders and responded to queries in relation to the reporting of APP scam data. These discussions, where appropriate, have been incorporated into this reporting guidance and the template.

Questions from PSPs

- 4.15** Where PSPs are unsure how to interpret any instructions within this guidance document, they should contact us directly with their query at the earliest opportunity.

Hierarchy

- 4.16** In following the guidance in this document and the existing guidance, PSPs should follow the hierarchy set out above (that is, starting with the specific direction, followed by the reporting guidance, followed by the policy statement and consultations).

5 Reporting

This chapter sets out our detailed reporting guidance.

It sets out the scope of the data to be reported, followed by the basis of reporting.

It sets out the reporting treatments that directed PSPs should adopt. It confirms the treatment of reimbursements and recoveries, both of which are key to the calculation of Metrics A and C. It also clarifies the treatment of a number of issues raised during our stakeholder engagement. The PSR would expect to revise this guidance over time, as more issues become apparent.

Reporting periods and submission deadlines

5.1 Our first data collection covers two separate reporting periods:

- 1 January to 30 June 2022 (H1 22).
- 1 July to 31 December 2022 (H2 22).

5.2 The deadline for the initial submission is 2 May 2023. (See Annex 1 for full details of the timetable, for the first reporting cycle).

5.3 In future, we will collect only one period at a time.

Scope

5.4 The scope of the data we require is as follows:

- **Volume and value:** Data on both the volume of APP scams and consumer payments that took place in each period, as well as the value of the APP scams and consumer payments in the same period.
- **Faster Payments only:** Directed participants should only report data for Faster Payments and not for any other payment system. Cases and payments across multiple payment systems, such as CHAPS, BACS and Faster Payments, must be disaggregated, so that the Faster Payments APP scams and payment transactions can be isolated.
- **Consumer only:** We only collect data for APP scams and consumer payment transactions (see paragraph 6.8 for our definition of 'consumer').
- **Group reporting:** Directed participants should report their results for Metrics A and B in aggregate for their group. However, exclude non-ring-fenced banks from the results for the group. By contrast, for Metric C, receiving PSPs are defined uniquely (for the purposes of reporting under Measure 1) by their individual sort codes, at the level of the Extended Industry Sort Code Directory (EISCD). This means that directed participants should report receiving PSP performance by individual PSP, not by group. We explain the treatment of sponsor and agency banks later in this guidance, at paragraphs 5.33 to 5.35.

- **Within the UK only:** We are only gathering data on UK APP scams and UK payment transactions. We exclude scams and payments with a non-UK receiving PSP).

On-us transactions must be included (see paragraphs 6.17 to 6.18 for a definition of on-us transactions). Non-loss cases (that is, cases where fraud has been prevented) **should be excluded**. This is also consistent with UK Finance reporting.

Basis of reporting

5.5 Specific Direction [XX] (paragraph 5.2) defines the basis of reporting as follows:

- a. A **consumer⁴ payment** is deemed to be made in a reporting period if the payer's instruction to their PSP to make the payment is given in that reporting period.
- b. An **APP scam case** is deemed to occur in a reporting period if the directed PSP has closed the APP scam case during that reporting period.
- c. An **APP scam payment** is deemed to be made in a reporting period if the directed PSP has closed the APP scam case relating to that payment during that reporting period.
- d. An **APP scam recovery** is deemed to be made in a reporting period if the directed PSP has received the funds during that reporting period. Note that this is irrespective of whether the APP scam case that the APP scam recovery relates to was closed and reported in a previous reporting period.

Explanation of Metrics A, B and C

5.6 Directed participants are required to capture data as follows:

- **Metric A:** The proportion of APP scammed customers who are left – fully or partially – out of pocket.
- **Metric B:** Sending PSPs' APP scam rates.
- **Metric C:** Receiving PSPs' APP scam rates, net of recoveries. Those comparisons will also include the wider set of receiving PSPs to whom the directed PSPs send payments.

Metric A

5.7 Metric A requires directed participants to provide data on the value of reimbursement provided, as well as the number of cases that were fully reimbursed, partially reimbursed, or not reimbursed at all.

4 The draft direction published with the December 2022 consultation defined the term 'payment'. We expect to change this terminology to 'consumer payment' in the final direction issued in March to give greater clarity and specificity, although the definition will remain unchanged.

Metric B

- 5.8** Metric B requires directed participants to provide data on the number of APP scam payments that were sent through Faster Payments, as well as on-us transactions that were reported as APP scams. Directed participants are also required to report the value of APP scams that were sent by them.

Metric C

- 5.9** Metric C requires directed participants to provide data on the number of APP scam payments that they sent and were received by other PSPs, as well as the value of these APP scam payments, in relation to each receiving PSP.
- 5.10** For the **value** version of Metric C, recoveries should be netted against the value of APP scam payments for each receiving PSP. This is to recognise the efforts of the receiving PSP in recovering the proceeds of crime.
- 5.11** However, for the **volume** version of Metric C, for pragmatic reasons, we have decided to report Metric C ignoring any recoveries.
- 5.12** The denominator (that is, what the scam data is compared to) for Metric C rates is the number or value of consumer payments (depending on whether the volume or value version of the metric is being calculated).
- 5.13** In respect of consumer payments, it is important to clarify that directed participants should report for all receiving PSPs that they sent at least one consumer payment to. Therefore, even if they did not send any scams to a receiving PSP, they should still include them in the reporting for consumer payments, provided that they sent at least one payment to them. The rationale for this is that, across all the directed participants, there may be some PSPs who have sent scams to a particular receiving PSP, even if others have not. To make a fair comparison with the total volume of consumer payments sent to that particular receiving PSP, we need to aggregate consumer payments across all the directed participants, even if for some directed PSPs there were no scams contained within these consumer payments.

Additional breakdown – by category of APP scam

- 5.14** We request a breakdown of certain data by APP scam type. The categories required are as follows:
- **Invoice and mandate:** The victim attempts to pay an invoice to a legitimate payee, but the criminal intervenes to convince the victim to redirect the payment to an account they control.
 - **CEO fraud:** The scammer manages to impersonate the CEO or other high-ranking official of the victim's organisation to convince the victim to make an urgent payment to the scammer's account.
 - **Impersonation (police/bank):** The criminal contacts the victim purporting to be from either the police or the victim's bank and convinces the victim to make a payment to an account they control.

- **Impersonation (other):** The criminal claims to represent an organisation such as a utility company, communications service provider or government department and convinces the victim to make a payment to an account they control.
- **Investment:** In an investment scam, a criminal convinces their victim to move their money to a fictitious fund or to pay for a fake investment.
- **Advance fee:** The scammer convinces their victim to pay a fee that they claim would result in the release of a much larger payment or high-value goods.
- **Romance scam:** The victim is persuaded to make a payment to a person they have met online (often through social media or dating websites), and with whom they believe they are in a relationship.
- **Purchase scam:** The victim pays in advance for goods or services that they never receive. These scams usually involve the victim using an online platform such as an auction website or social media.
- **Unknown type:** This category is provided for completeness, where an APP scam cannot be attributed within the above categories.

Reimbursements and recoveries

Definitions

- 5.15** In this section, we set out our reporting approach for reimbursements and recoveries. See Chapter 6 for the definitions of 'reimbursement' and 'recovery'.

Metric A

- 5.16** In reporting Metric A, directed participants are required to capture the following value data (as well as similar volume data):

- The case value.
- The value reimbursed.

- 5.17** We recognise that, in some instances, cases will be closed before recoveries have been received. In this instance, report the position of the case on its closure and any recoveries made in that period. Report any subsequent recoveries within the reporting period when the recovery is received.

Worked example 1: value – partial recovery across two periods

- 5.18** In this example, we discuss a hypothetical case/claim with a value of £100. For illustrative purposes, we assume a share of the liability that is 60:40⁵ between the sending PSP and the customer.

⁵ Note: We have deliberately chosen numbers in our example, for illustrative purposes, using an asymmetrical split between the PSP and the customer. This is to provide added clarity. In practice, the split may often be symmetrical (that is, 50:50).

5.19 We also assume that the funds are partially recovered during the second half-year reporting period.

Therefore, upon case closure in Half-year 1, the sending PSP reimburses 60% to the customer.

	Case value	Value reimbursed
Half-year 1	£100	£60

During the second half-year, a recovery of £70 is received from the Receiving PSP.

	Case value	Value reimbursed
Half-year 1	£100	£60
Half-year 2	£0	£40
Total	£100	£100

Note: The remaining £30 of the £70 recovered may be used by the Sending Bank to reduce its loss – although this does not form part of our reporting here.

Metric C

5.20 As explained in paragraphs 5.6 to 5.13, for the volume version of Metric C we have decided to ignore recoveries as a simplification in calculating the **volume** version of Metric C. However, recoveries must still be netted in the calculation of the **value** version of Metric C.

5.21 There are two principal reasons to simplify the volume calculation. Firstly, some receiving PSPs are unable to provide a breakdown of their recoveries by APP scam case or by APP scam payment. They may simply provide a bulk figure for recoveries to each sending PSP. Secondly, even if a recovery can be matched against an individual APP scam payment (and thus identify an instance of full or partial recovery), there are methodological complications in suitably reflecting these recoveries in the final value of Metric C calculated.

5.22 To reflect a partial recovery more accurately in the **volume** calculation of Metric C, we would need to give some weighting to it (since it does not constitute one full recovery instance) – or alternatively split the Metric into two sub-categories: net of full recovery and net of partial recoveries. Such an approach could over-complicate the compilation and presentation of the Metric.

5.23 Nevertheless, we believe that reporting a crude **volume** version of Metric C – without netting off any recoveries – will still yield some useful insight, over and above simply considering the **value** version of Metric C (which can be calculated net of recoveries).

Additional points

Inaccuracies, where cases straddle half-years

- 5.24** Where a case straddles two half-years, the aggregate position over time will not be visible or reported.
- 5.25** This is an inaccuracy and an approximation that we accept. We do not propose going back to earlier periods to restate them, since this would over-complicate reporting.
- 5.26** In many cases, this will not be a material issue. Many recoveries will happen within the same six-month reporting period, particularly since a successful recovery usually happens within a relatively narrow window of time.
- 5.27** However, for smaller PSPs (whether directed participants or receiving PSPs in the case of Metric C) with fewer fraud cases, a large fraud case, with recovery straddling the period end, could distort results more significantly. If this issue affects PSPs' results, PSPs should note it in commentary.

Metric A volume measure: reporting reimbursement cases with multiple payments

- 5.28** For the Metric A volume measure, where a case that involves multiple transactions and a partial reimbursement, this should be reported on a case basis.
- 5.29** This means that, where a reimbursement of a whole transaction occurs within a case of multiple transactions, this should be reported as a partial reimbursement case unless **all** the transactions comprising the case were fully recovered (in which case, it would be reported as a fully reimbursed case).

Liability share arrangements are excluded from recoveries

- 5.30** Recoveries should only include funds that the receiving PSP has successfully sought from the fraudster, or a further PSP, to whom the funds had previously been transferred.
- 5.31** Funds transferred from the receiving PSP to the directed participant, as the result of an arrangement to share liability, should therefore be excluded from recoveries – since this does not reflect a receiving PSP retrieving the money from its destination. Similarly, fund transfers resulting from future regulations or legislation providing for a liability share, such as our APP scams Measure 3 proposals, should also be excluded from recoveries.

Bank loss refunds should not be included in recoveries

- 5.32** PSPs should not report any money they refund to customers at their own cost as recoveries (although refunds will be recognised elsewhere via reporting of the reimbursement).

Detailed reporting guidance

Sponsor banks and agency banks

- 5.33** For the purposes of preparing Metric C, we want to be able to distinguish between APP scams and payment transactions a sponsor bank receives on behalf of its own customers' accounts, and those it receives on behalf of an agency bank's customers' accounts. However, there are currently practical limitations on the amount of detail available regarding the end recipient.
- 5.34** Directed participants must therefore use the names set out in the EISCD database (also included in Annex 3 of this document). This will allow us to distinguish, as far as possible, the performance of sponsor banks and agency banks.
- 5.35** Where receiving PSPs are indirect PSPs that do not have their own unique sort code, receiving PSPs that are sponsor banks may, in addition, provide a more granular breakdown of APP scams received and payment transactions received, where possible, to directed participants and the PSR. Such a breakdown should distinguish between receipts on behalf of sponsor banks themselves and on behalf of agency banks.

Financial Ombudsman Service rulings

- 5.36** Any reimbursements related to Financial Ombudsman rulings should not be reported within reimbursements. Rather, they should be reported separately, so that they can be distinguished from other reimbursements. Such reimbursements include those resulting directly from cases that the Financial Ombudsman has reviewed, as well as those resulting from a subsequent review of cases by a directed participant following guidance issued by the Financial Ombudsman.

Non-loss transactions and scams prevented

- 5.37** Do not report any **potential** APP scams where there is no loss to customers (that is, the APP scam was prevented before it could happen).
- 5.38** However, this does not mean that directed participants should exclude APP scams where customers notify the bank of the scam and then the funds are subsequently fully recovered.

Cases on multiple payment systems

- 5.39** In some instances, a significant long-running fraud case may take place across a number of different payment systems, such as Faster Payments, BACS and CHAPS. In such cases, involving different payment systems, directed participants should only submit data relating to transactions taking place on Faster Payments.
- 5.40** Directed participants should disaggregate the case value so that it only reflects the transactions taking place on Faster Payments and not the whole reported fraud case value.

On-us transactions

- 5.41** On-us transactions should be included in data submissions (that is, transactions between two account holders within the same group).
- 5.42** Depending on the commercial arrangements for directed participants, these payments may pass either externally via Faster Payments or internally as a book transfer. This does not affect relevance and PSPs should include these transactions in reporting regardless.
- 5.43** On-us transactions should not be reported on a separate line.

Microbusiness reporting

- 5.44** The definition that we use for 'consumer' also includes microbusinesses with under £2 million turnover and small charities with under £1 million turnover.
- 5.45** This requires PSPs to carry out a turnover check for their small business customers, to determine whether they should be considered to be consumers and included in the data submission.
- 5.46** We recommend that PSPs review the customers' turnovers on a half-yearly basis, via reference to Companies House or the Charity Commission.
- 5.47** For reasons of practicality, directed PSPs may use their existing classification of 'consumer' or the equivalent term, used for their own reporting, where this is unlikely to yield results that differ materially from those expected to be generated by our definition.
- 5.48** In such a case, a directed PSP should clearly explain their own definition of 'consumer' in the accompanying explanations and provide details of how they have concluded that their approach does not lead to results that would materially differ from using the definition in Specific Direction [XX].

6 Definitions

The definitions here supplement the definitions set out in Specific Direction [XX].

Specific Direction [XX]

- 6.1** Specific Direction [XX] takes precedence over this document. We include only definitions that are supplemental to the specific direction here.

Supplemental definitions

Note to PSPs – this whole section will be revised when the specific direction is finalised. Only definitions that are supplemental to the specific direction will be included here.

Agency bank or agency PSP

- 6.2** An indirect PSP that may or may not have its own sort code provided by its indirect access provider.

BACS

- 6.3** The regulated payment system used to make payments directly from one bank account to another. Primarily used for direct debits and direct credits from organisations.
- 6.4** The BACS payment system is operated by Pay.UK.

CHAPS

- 6.5** The UK's real-time, high-value, regulated payment system, where payments are settled over the Bank of England's Real Time Gross Settlement (RTGS) system.
- 6.6** The CHAPS payment system is operated by the Bank of England.

Directed participant

- 6.7** A directed participant is a PSP subject to the requirements of Specific Direction [XX].

Consumer

- 6.8** The definition of 'consumer' is set out in Specific Direction [XX] under Section 15.5.⁶
- 6.9** PSPs may use their existing classification of consumer or the equivalent term, used for their own reporting, where this is not expected to yield results that differ materially from those expected to be generated by the above definition (see paragraph 5.44 to 5.48).

⁶ This can be found in the draft direction contained within CP22/5, [Authorised push payment scams: Measure 1. Metric C process: revised approach](#) (December 2022).

Contingent Reimbursement Model Code (CRM Code)

- 6.10** An industry code that sets out the standards expected of PSPs when an APP scam occurs.
- 6.11** The Lending Standards Board (LSB) oversees the Code and its members.

EISCD

- 6.12** The Extended Industry Sort Code Directory.⁷

FSBRA

- 6.13** Financial Services (Banking Reform) Act 2013.

Microbusiness

- 6.14** Microbusiness is a defined term in the CRM Code.
- 6.15** A micro-enterprise, as defined in regulation 2(1) of the PSRs 2017 that is, in summary, an enterprise that employs fewer than ten persons and whose annual turnover and/or annual balance sheet total does not exceed EUR 2 million.
- 6.16** Microbusinesses are included within the definition of Consumers, as set out in the CRM Code.

On-us

- 6.17** On-us transactions refer to transactions between one account holder and another account holder, within the same group⁸. These transactions may pass over the internal systems of a directed PSP or may pass externally via Faster Payments. In the case of an on-us transaction, the sending PSP and the receiving PSP would be part of the same group (that is, the directed participant).
- 6.18** The term 'on-us' may be applied to both payments and APP scams.

Recovery

- 6.19** Funds recovered by the receiving bank and returned to the sending bank in relation to an APP scam. These are returned to the customer via the sending bank in the first instance.
- 6.20** Recoveries only refer to funds (being the proceeds of crime) obtained by the receiving bank from the fraudster or one of the banks in the onward chain of payment departing from the receiving bank.
- 6.21** To be clear, where there is a payment by the receiving bank to the sending bank as part of an agreement to share liability, to share the costs of reimbursing the customer or as a result of a legal or regulatory requirement, this payment should not be included.

⁷ Available here: <https://www.vocalink.com/tools/extended-industry-sort-code-directory/>, last accessed on 8 September 2022.

⁸ This is consistent with the definition already used for Confirmation of Payee (CoP) quarterly template reporting to the PSR (see 'Guide' tab, Section B, Note 10).

(However, as explained in paragraph 6.20, any element obtained from the fraudster or a bank in the onward chain may be included).

6.22 We need recoveries in order to calculate the **value** version of Metric C where they are netted off against APP scam funds received by receiving PSPs. This is to recognise the efforts of recovering the proceeds of crime.

6.23 Recoveries may also occur at a later date, after a case has closed.

Reimbursement

6.24 Reimbursement represents the total monies that have been given back to the customer to reduce or eliminate their loss from the APP scam.

6.25 It doesn't matter through what process these monies were obtained: any money going back to the customer to reduce their loss should be recognised.

6.26 Reimbursement may include (but is not limited to) refunds and goodwill gestures from the sending bank or receiving bank, recoveries, liability shares from the receiving bank and payments from the receiving bank as a result of a legal or regulatory requirement.

6.27 However, monies given back to the customer following a Financial Ombudsman ruling should be excluded and reported separately, as explained further at paragraph 5.36.

6.28 The reimbursement cannot and should not exceed the initial case value. Therefore, any excess funds would not be reported under reimbursement (though they may be used by the sending bank to reduce any bank loss that it has incurred).

Reporting guidance

6.29 The reporting guidance refers to this document and the guidance contained within it.

6.30 The reporting guidance is one example of the guidance referred to in the specific direction (see paragraphs 3.2 to 3.4 of the specific direction).

Specific Direction [XX]

6.31 Specific Direction [XX] was issued on [XXXX], to [X] directed participants. It sets out the legal requirements for reporting APP scam data to the PSR and refers to this reporting guidance within its requirements (see paragraphs [3.2 to 3.4] of the specific direction).

6.32 The content of Specific Direction [XX] takes precedence over the content of this guidance document.

7 Metric C process

The 14 directed sending payment service providers (PSPs) and receiving PSPs should work together to validate Metric C data. We consulted on a new approach in December 2022.

An opportunity for receiving PSPs to check the data

- 7.1** Receiving PSPs whose data may be eligible for publication are **not required** to validate all their Metric C data with sending PSPs. However, a receiving PSP has the **opportunity to obtain and check** its data from the sending PSP before it is published. A receiving PSP may request a breakdown of its data from the sending PSP. The sending PSP is required to assist receiving PSPs in providing the information to help them in checking.
- 7.2** Subsequently, a receiving PSP may make a request, supported by evidence, to a sending PSP to correct its data. The sending PSP will need to conduct its own investigation, and it will be for the sending PSP to decide whether to make a revision before re-submitting the revised data to us.
- 7.3** Some receiving PSPs may already have systems and access to information that allow them to carry out a validation. We would encourage receiving PSPs to do this, and also sending PSPs where possible. However, this is not a requirement under Specific Direction [XX].

The Process for Metric C

- 7.4** Figure 1 sets out the process for Metric C. Further details regarding some aspects are set out in the section that follows Figure 1.

Figure 1: The Metric C process

1	Initial data submission	The 14 directed sending PSPs to submit Metric C data on receiving PSPs to the PSR.	Month 1
2	Aggregation and shortlist of 25 firms	The PSR aggregates total results for each receiving PSP. And identifies shortlist of 25 most significant firms, that are likely to appear in the Metric C publication. These 25 firms are notified and provided with their Metric C data.	Week 1
3	Receiving PSPs optionally challenge data with sending PSPs	Receiving PSPs can request from sending PSPs: <ul style="list-style-type: none"> • a full transaction file/detailed supporting data • evidence/breakdowns, in particular regarding frauds 	Month 2 Week 2
4	Sending PSPs provide requested data	Sending PSPs to provide requested data to receiving PSPs.	Week 3
5	Receiving PSPs request changes	Request to be supported by reasons and where possible evidence.	Month 3
6	Sending PSPs resubmit data to the PSR	Sending PSPs evaluate the evidence provided and amend data where appropriate. They then resubmit the data, accompanied with explanations and supporting evidence of any changes, with a Chief Financial Officer statement of assurance.	Month 4
7	Indirect PSPs	Receiving PSPs who receive funds on behalf of indirect PSPs may voluntarily provide a breakdown of their results; by each indirect PSP itself. Accompanied with explanations and supporting evidence.	Month 4
8	PSR publishes Metric C data	Published information will be drawn from the data of the final 20 most significant PSPs, by both value and volume.	Months 5-6

Details of the process

7.5 In the section below, we provide further details of the Metric C process.

We select firms and compile final lists for publication

7.6 Once the 14 directed sending PSPs have given us their data, we will identify which PSPs may ultimately be included in the Metric C publication. We will prepare two shortlists of 25 firms (the specified receiving PSPs) – one for volume and one for value. We will base this on PSPs that:

- receive the largest amounts of fraud
- receive the largest amounts of total payments
- have the highest rate of fraud as a share of their total payments

This will ensure the biggest impact through our intervention.

7.7 We will write to directed PSPs and the specified receiving PSPs, informing them who is on the lists. We will give each specified receiving PSP a copy of its Metric C data, aggregated across all the directed PSPs, together with a breakdown by individual directed PSP.

7.8 During the Metric C process, we propose to initially allow 25 specified receiving PSPs the opportunity to validate their data (being two lists of 25 – one for volume and one for value). This is because some firms will fall on the boundary between being in the top 20 or outside it. However, once the data is finalised, we will be more confident of the exact cut-off and will narrow the lists to final selections of 20 for publication.

7.9 Across both lists, the total number of firms concerned may exceed 25, since there may be some differences between the two lists.

7.10 At the end of the Metric C process, we will select our final published output from the two final lists of 20 firms, one by volume and one by value. We will advise directed PSPs of what needs to be published. We will inform those receiving PSPs that are included on the final list before publishing.

Timelines and reporting periods for our new process

7.11 The timing for the process (as outlined above in Figure 1) will be:

Action	Timing
PSR to receive data from sending PSPs	Month 1
PSR to contact the 25 PSPs who are most significant (and to provide a breakdown of their results by each of the 14 directed PSPs)	Month 2 (Week 1)
Receiving PSPs can check data and request breakdown from sending PSPs	Month 2 (Week 2)
Sending PSPs provide breakdown to receiving PSPs	Month 2 (Week 3)
Receiving PSPs review detailed breakdown and submit requests for revision to sending PSPs	Month 3
Sending PSPs consider requests for revisions and re-submit revised data to PSR	Month 4
PSR reviews the data and prudential considerations, and prepares publication formats	Months 5 and 6

7.12 In the first publication of Metric C data in October 2023, there will be two reporting periods, as follows:

- H1 2022: January 2022 to June 2022.
- H2 2022: July 2022 to December 2022.

7.13 Both periods will be reported at the same time in the first publication. In the second publication, we will introduce a regular six-monthly cycle, with a six-month difference between the end of the reporting period and publication. The second publication will cover H1 2023. We will require PSPs to prepare data in mid-2023 and we intend to publish the second cycle of data in January 2024.

Disputes between sending PSPs and receiving PSPs

7.14 To ensure that the Metric C data remains relevant when published, we will publish it six months after the respective reporting period. As such, we expect sending and receiving PSPs to work together and avoid protracted discussions on the accuracy of the data. Receiving PSPs should be reasonable and judicious when challenging data. Therefore, they should limit their challenge to only the relevant sending PSPs and the transactions that were material to their concerns.

- 7.15** To keep the checking process balanced, receiving PSPs should only make one request to sending PSPs for their results to be altered. Sending PSPs can then consider all the information as a whole. It is therefore in the receiving PSPs' interests to provide all the relevant information at the time they make their request to the sending PSPs.
- 7.16** This does not prevent two-way discussions and exchanges of information between the parties before the receiving PSPs make their request for changes to the sending PSPs.

Indirect PSPs

- 7.17** Some receiving PSPs may not be direct participants in Faster Payments. These indirect PSPs (also known as 'agency banks' or 'agency PSPs') access Faster Payments via an indirect access provider (IAP) intermediary that is a direct participant (also known as a 'sponsor bank' or 'sponsor PSP'). Therefore, fraudulent transactions may be passed through the sponsor bank to the ultimate recipient PSP.
- 7.18** The business model adopted by sponsor PSPs can vary. Some may offer both indirect sort code access and indirect account access. Indirect sort code access is where the indirect PSP has its own sort code and will issue its own account numbers to its customers. Indirect account access is where the indirect PSP receives all the funds into one sort code and account number, then allocates payments using internal systems. Some PSPs may use a mix of these two models.
- 7.19** In the first instance, for Metric C data, sending PSPs should identify and report receiving PSP data at the sort-code level, via the Extended Industry Sort Code Directory (EISCD) listings. This will require sponsor PSPs to ensure that, for indirect sort code access clients, their EISCD listing is up to date and that the indirect PSP is properly identifiable.
- 7.20** Depending on the model adopted by sponsor PSPs, some indirect PSPs, where they have their own unique sort code, may be identified directly as receiving parties at this first stage. However, there will remain some indirect PSPs that do not have a separate unique sort code. In this case, their Metric C results will remain aggregated within the overall results for the sponsor PSP.
- 7.21** In summary and in terms of what is published, where sponsor PSPs are able to provide us with an accurate disaggregation of data on their indirect PSPs, we will publish this. However, where a sponsor PSP is unable to disaggregate their data, we will publish the aggregated result for them.

General guidance for receiving PSPs

Guidance defined in Specific Direction [XX]

- 7.22** This guidance should be read in conjunction with Specific Direction [XX]. Where elements of the direction are relevant to this guidance, they apply. We have not repeated them here.
- 7.23** Where terms are defined in the direction, we have also applied them in this guidance.
- 7.24** We have set out, in earlier sections of this reporting guidance, the other guidance that is relevant to receiving PSPs and the hierarchy in which this applies.

Scope

- 7.25** This guidance applies to all specified receiving PSPs. A specified receiving PSP is defined in Specific Direction [XX].
- 7.26** This guidance is considered best practice of the steps that specified receiving PSPs should take.
- 7.27** Receiving PSPs will be identified at the sort-code level via the Extended Industry Sort Code Directory (EISCD) listing.

Notification of specified receiving PSPs (Step 2)

- 7.28** We will write to each specified receiving PSP to inform it that it is a specified receiving PSP for the reporting cycle. For each specified receiving PSP, the PSR will provide a copy of its Metric C data to it, identifying the totals for each directed PSP and an aggregated total.
- 7.29** Subject to receiving the relevant data on time, we will write to specified PSPs within one week of the first PSR reporting day.

Receiving PSPs may request further information from directed PSPs (Step 3)

- 7.30** A specified receiving PSP may request further information from certain directed PSPs. This information may include transaction details, supporting data and supporting evidence, including evidence of a fraud and breakdowns of their Metric C data.
- 7.31** Receiving PSPs should only challenge data where their concerns might lead to a significant impact for them. Therefore, they should limit their challenge solely to the relevant sending PSPs and the transactions that were material to their concerns.
- 7.32** Receiving PSPs should endeavour to make their request for more information to a directed PSP within one week of notification by the PSR.
- 7.33** Receiving PSPs' requests may be made during the period between the first PSR reporting day and ending one week before the date that is two calendar months after the first PSR reporting day.

Receiving PSPs submit requests for changes to the directed PSPs (Step 5)

- 7.34** After reviewing the information provided by a directed PSP, a receiving PSP may request that a directed PSP make adjustments to their data. Any such request should be supported as fully as possible by providing information, supporting evidence and explanations relevant to the adjustment that they are requesting.
- 7.35** A request may only be made once during the process. Therefore, receiving PSPs should ensure that the request is supported as fully as possible.
- 7.36** Requests may be made during the period between the first PSR reporting day and ending two calendar months after the reporting day.

Revised data, accompanying explanation and supporting evidence (Step 6)

- 7.37** A directed PSP will provide the revised receiving-PSP information to the specified receiving PSP. This will be accompanied by a reasoned written explanation of how the directed PSP has taken account of the specified receiving PSP's comments, together with any supporting evidence that the directed PSP has relied upon, including where the directed PSP has decided not to make adjustments.
- 7.38** The directed PSP will provide this following the request for a change from the specified receiving PSP and no later than the final PSR reporting day.

Indirect PSP information (Step 7)

- 7.39** IAPs to Faster Payments (also known as 'sponsors'), where they are able to disaggregate their receiving-PSP information by indirect PSPs, may provide this disaggregated data to the PSR, accompanied by explanations and supporting evidence. The PSR will consider this information and, if satisfied as to its validity, may consider publishing disaggregated results for that IAP.
- 7.40** IAPs may provide this information during the period between the first PSR reporting day and ending with the final PSR reporting day.

PSR notifies receiving PSPs that their data will be published (Step 8)

- 7.41** The PSR will write to the specified receiving PSPs whose data will be published to confirm that they will be included within the data to be published and the basis upon which the PSR has made that decision.
- 7.42** The PSR will do this after the final PSR reporting day and no later than two working days before the date of publication.

8 Assurance

The chief financial officers (CFOs) of directed payment service providers (PSPs) should submit a statement of assurance along with their data. This chapter and the template in Annex 2 provide further details.

Background

- 8.1** Initially, we will rely upon directed PSPs to provide self-assurance over their reporting, as the main method of assurance. This will be via a signed statement from their CFO or an equivalent level senior executive of the Directed PSP with ultimate responsibility for the preparation of the data. We will keep the effectiveness of this method of assurance under review during subsequent periods.
- 8.2** The PSR will supplement this with some basic sense checks over the submissions that we receive.

CFO (or equivalent) sign-off

- 8.3** Directed PSPs should submit a statement of assurance, signed by their CFO, along with their data submission.
- 8.4** This statement will provide assurance over the completeness and accuracy of their reporting, as well as confirming that the guidance has been followed, and that the preparation and presentation of their data is intended to achieve the objective set out in this document.
- 8.5** CFOs may note any areas of concern, omissions, estimates or departures from the reporting guidance, should that be applicable.
- 8.6** We provide a template statement at Annex 2. This template is illustrative of the form of assurance that the PSR is seeking. However, there is flexibility for directed PSPs to depart from this template if they believe that another form of words is more appropriate.

Annex 1

Timetable

- This annex sets out the key deadlines in the reporting process for the first and second reporting cycles.
- The direction and the reporting guidance set out the timings in general terms for reporting cycles. For the sake of clarity, we have converted these below into the actual dates⁹ for the first two cycles.
- Our intention would be to issue such a timetable with the reporting guidance for future cycles.

Timetable: first reporting cycle

Action	Timing
PSR to receive data from sending PSPs First PSR reporting day	Tuesday 2 May 2023
PSR to contact the 25 PSPs who are the most significant (and to provide a breakdown of their results by each of the 14 sending PSPs)	Tuesday 9 May 2023
Receiving PSPs can check data and request breakdown from sending PSPs	Tuesday 16 May 2023
Sending PSPs provide breakdown to receiving PSPs	Tuesday 23 May 2023
Receiving PSPs review detailed breakdown and submit request for revision to sending PSPs	Monday 3 July 2023
Sending PSPs consider requests for revisions and re-submit revised data to PSR Final PSR reporting day	Tuesday 1 August 2023
Sponsor PSPs may submit disaggregated Indirect PSP data to PSR	Tuesday 1 August 2023
PSR to review the data, prudential considerations, prepare publication formats Publication month	October 2023

⁹ Timings and dates may be adjusted, if needed, to take account of responses to the December 2022 consultation.

Reporting periods: first reporting cycle

- H1 2022: January 2022 to June 2022.
- H2 2022: July 2022 to December 2022.

Timetable: second reporting cycle

Action	Timing
PSR to receive data from sending PSPs First PSR reporting day	Tuesday 1 August 2023
PSR to contact the 25 PSPs who are the most significant (and to provide a breakdown of their results by each of the 14 sending PSPs)	Tuesday 8 August 2023
Receiving PSPs can check data and request breakdown from sending PSPs	Tuesday 15 August 2023
Sending PSPs provide breakdown to receiving PSPs	Tuesday 22 August 2023
Receiving PSPs review detailed breakdown and submit request for revision to sending PSPs	Monday 2 October 2023
Sending PSPs consider requests for revisions and re-submit revised data to PSR Final PSR reporting day	Wednesday 1 November 2023
Sponsor PSPs may submit disaggregated indirect PSP data to PSR	Wednesday 1 November 2023
PSR to review the data, prudential considerations, prepare publication formats Publication month	January 2024

Reporting period: second reporting cycle

- H1 2023: January 2023 to June 2023.

Annex 2

CFO statement of assurance

Template assurance statement

Addressee: To the Payment Systems Regulator (PSR)

Directed payment service provider (PSP): XXXXXX (*name of PSP completing this assurance statement*)

Date of assurance statement: XX Day/ XX Month/ XX Year

Reporting period(s): *e.g. Half-year 1 of 2021 (H1 21):
1 January to 30 June 2021*

Title: Chief Financial Officer Statement of Assurance

Subject: Authorised push payment (APP) scam data collection under
Specific Direction XXX

I confirm to the best of my knowledge that:

- our APP scam reporting submitted to you, as detailed above, is complete and accurate, and has been properly prepared in accordance with Specific Direction XXX and the reporting guidance for this reporting period
- we have followed the objective and principles set out in the reporting guidance and our reporting fairly represents the performance of our entity
- we have provided full and adequate accompanying explanations in order for the PSR to fully understand the nature of our reporting and as required under the reporting guidance
- if applicable, we have noted and explained any areas of concern, omissions, estimates and departures from the reporting guidance

I am the senior executive director of XXXX (*name of entity*) responsible for the preparation and reporting of this data.

Signed: XXXX (*Full name*)

Position: *e.g. Chief Financial Officer (or equivalent senior executive responsible for data preparation and reporting)*

Date: XXXX

Address: *Address of directed PSP*

Annex 3

Entity names

Summary:

- This section provides a list of the specific names that must be used for the most common entities when reporting the authorised push payment (APP) scam data.
- The short name should be used in reporting to the PSR. However, we have also provided the full name alongside, for completeness.

- 3.1** To support a consistent approach and aid in the data collection process, please use the entity names of the following formats when submitting your data. We have based this list of entity names on the EISCD¹⁰ (extended industry sort code directory) dataset, as of 11 July 2022.¹¹
- 3.2** The Bank Short Name is the key name that should be used in reporting to the PSR, as set out in this list. We have also provided the bank full name alongside this, for completeness.
- 3.3** Where an entity does not appear in this list, please use their full name as provided from an official external source, such as Companies House in the UK.
- 3.4** If possible, where an entity is missing or there is confusion around which specific name to use, please also contact us as soon as possible. We may then be able to consider issuing an agreed specific name for all Directed PSPs to use in the data submission. This will make data processing more efficient.

Bank short name	Bank full name
6 TOWNS CR UNION LTD	6 TOWNS CREDIT UNION LIMITED
A&NZ BANKING GROUP	AUSTRALIA & NEW ZEALAND BANKING GRO
AAVE LIMITED	AAVE LIMITED
ABBAY NAT TY INT LTD	ABBAY NATIONAL TREASURY SERVICES PL
ABC INT BANK PLC	ABC INTERNATIONAL BANK PLC
ABN AMRO BANK N.V	ABN AMRO BANK N.V
ACE UNION LIMITED	ACE UNION LIMITED
ADAM & CO (RBS PLC)	ADAM & COMPANY PLC (A TRADING NAME)
AHLI UNITED BANK UK	AHLI United Bank (UK) Plc

¹⁰ As administered and published by Vocalink:
<https://www.vocalink.com/tools/extended-industry-sort-code-directory/>

¹¹ For future reporting cycles, we will update this list by using a more recent EISCD, relevant to the reporting period.

Bank short name	Bank full name
AIB (NI)	AIB GROUP (UK) PLC (TRADING NAME AI
AIB Group (UK)	AIB Group (UK) Plc
AL RAYAN BANK PLC	AL RAYAN BANK PLC
ALDERMORE BANK	ALDERMORE BANK PLC
ALLICA BANK LIMITED	ALLICA BANK LIMITED
ALLIED IRISH BANK GB	AIB GROUP (UK) PLC T/A ALLIED IRISH
ALLPAY LIMITED	ALLPAY LIMITED
ALPHA BANK LONDON	ALPHA BANK LONDON LTD
ALPHA FX LTD	ALPHA FX LIMITED
APS LIMITED	ADVANCED PAYMENT SOLUTIONS LTD
ARAB NATIONAL BANK	ARAB NATIONAL BANK
ARBUTHNOT LATHAM & CO	ARBUTHNOT LATHAM AND CO LTD
ARDOHR LIMITED	ARDOHR LIMITED
ATOM BANK PLC	ATOM BANK PLC
AXIS BANK UK LTD	AXIS BANK UK LTD
BABB	BABB REMIT LTD
BANCO DE SABADELL	BANCO DE SABADELL
BANCO DO BRASIL S.A.	BANCO DO BRASIL SA
BANCO SANTANDER SA	BANCO SANTANDER S.A.
BANGKOK BANK PCL	BANGKOK BANK PUBLIC COMPANY LIMITED
Bank Beirut (UK) Ltd	Bank of Beirut (UK) Limited
BANK HAPOALIM B.M.	BANK HAPOALIM BM
BANK LEUMI UK PLC	BANK LEUMI (UK) PLC
BANK NEGARA	PT BANK NEGARA INDONESIA (PERSERO)
BANK OF AMERICA, NA	BANK OF AMERICA, NA
BANK OF BARODA	BANK OF BARODA
BANK OF CEYLON (UK)	BANK OF CEYLON (UK) LIMITED
BANK OF CHINA LTD	BANK OF CHINA LIMITED
BANK OF ENGLAND	BANK OF ENGLAND
BANK OF ENGLAND RT	BANK OF ENGLAND

Bank short name	Bank full name
BANK OF INDIA	BANK OF INDIA
BANK OF MONTREAL	BANK OF MONTREAL
Bank of Philippines	BANK OF THE PHILIPPINE ISLANDS (EUR)
Bank of Scotland plc	Bank of Scotland plc
BANK OF TAIWAN	BANK OF TAIWAN
BANKAMERICA	BANK OF AMERICA NA
BANKING CIRCLE S.A.	BANKING CIRCLE S.A.
BANQUE BANORIENT	BANQUE BANORIENT FRANCE
BANQUE HAVILLAND SA	BANQUE HAVILLAND SA
BARCLAYS BANK PLC	BARCLAYS BANK PLC
BARCLAYS BANK UK PLC	BARCLAYS BANK UK PLC
BARINGS (GUERNSEY)	Northern Trust Guernsey Ltd
BAYERISCHE LANDESBK	BAYERISCHE LANDESBANK
BAZAR MONEY TRANSFER	BAZAR MONEY TRANSFER LTD
BCB PAYMENTS LTD	BCB PAYMENTS LTD
BFC BANK	BFC BANK LIMITED
BILBADVIZCAYAARGENTI	BANCO BILBAO-VIZCAYA ARGENTARIA SA
BILDERLINGS PAY	BILDERLINGS PAY LTD
BK IRELAND FSHARP	BANK OF IRELAND FSHARP LIMITED
BK JULIUS BAER-GUERN	BANK JULIUS BAER & CO LTD - GUERNSE
BK LON & MIDDLE EAST	BANK OF LONDON AND THE MIDDLE EAST
BK MANDIRI (EUROPE)	BANK MANDIRI (EUROPE) LTD
Bk NY Mellon Int	THE BANK OF NEW YORK MELLON INTERNA
BK OF BARODA (UK) LTD	BANK OF BARODA (UK) LIMITED
Bk of Comms Co. Ltd	Bank of Communications Co. Limited
BK OF EAST ASIA LTD	BANK OF EAST ASIA LTD
Bk of NY Mellon	THE BANK OF NEW YORK MELLON
BK SCOT/BIRM M'SHIRE	BANK OF SCOTLAND TRADING AS BIRMING
BLABLA CONNECT	BLABLA CONNECT LIMITED
Black Horse Ltd	BLACK HORSE LIMITED

Bank short name	Bank full name
BLACKTHORN FINANCE	BLACKTHORN FINANCE LTD
BMCE BANK INTL PLC	BMCE BANK INTERNATIONAL PLC
BNK of CHINA UK	BANK OF CHINA (UK) LTD
BNP PARIBAS	BNP PARIBAS
BNP PARIBAS JERSEY	BNP PARIBAS SECURITIES SERVICES S.C
BNP PARIBAS SECURITI	BNP PARIBAS SECURITIES SERVICES
BOI UK PLC	BANK OF IRELAND (UK) PLC
BRADFORD & BINGLEY	BRADFORD & BINGLEY LIMITED
BRIT ARAB COMM BANK	BRITISH ARAB COMMERCIAL BANK LTD
BRITANNIA	CO-OPERATIVE BANK T/A BRITANNIA
BROWN SHIPLEY	BROWN, SHIPLEY & CO LTD
Butterfield bk Guern	Butterfield Bank (Guernsey) Limited
BUTTERFLD BK (JERSEY)	BUTTERFIELD BANK (JERSEY) LTD
BYBLOS BANK S.A.L	BYBLOS BANK EUROPE SA
C HOARE & CO	C HOARE & CO
CACEIS BANK	CACEIS BANK
CAF BANK LTD	CAF BANK LIMITED
CAIXABANK SA	CAIXABANK SA
Cambridge & Counties	Cambridge & Counties Bank Limited
CANARA BANK	CANARA BANK
CAPITAL INT BANK LTD	CAPITAL INTERNATIONAL BANK LIMITED
CASHPLUS BANK	CASHPLUS BANK:ADVANCED PAYMENT SOLU
CASTLE TRUST CAPITAL	CASTLE TRUST CAPITAL PLC
CATER ALLEN LTD	CATER ALLEN LTD
CAYMAN NAT BANK (IOM)	CAYMAN NATIONAL BANK (ISLE OF MAN)
CB PAYMENTS LTD	CB PAYMENTS LTD
CHANG HWA COM BK LTD	CHANG HWA COMMERCIAL BANK LTD
CHASE	CHASE (TRADING NAME OF JP MORGAN EU
CHIBA BANK LTD	CHIBA BANK LTD
China Cons BK Ltd	China Construction Bank (London) Li

Bank short name	Bank full name
CHINA MERCHANTS BANK	CHINA MERCHANTS BANK CO., LTD
CHORLEY & DISTRICT BS	THE CHORLEY & DISTRICT BUILDING SOC
CIMB BK BERHAD	CIMB BANK BERHAD
CITIBANK NA	CITIBANK NA
CITIBANK NA JERSEY	CITIBANK NA JERSEY BRANCH
CITIBANK UK LTD	CITIBANK UK LIMITED
CLEAR JUNCTION	CLEAR JUNCTION LIMITED
CLEARBANK	CLEARBANK LIMITED
CLOCKWISE	CLOCKWISE CREDIT UNION LIMITED
CLOSE BROTHERS LTD	CLOSE BROTHERS LIMITED
CLS BANK	CLS BANK INTERNATIONAL
CLYDEBANK MUNICIPAL	CLYDEBANK MUNICIPAL BANK LIMITED
CLYDESDALE	CLYDESDALE BANK PLC
CLYDESDALE BANK INTL	CLYDESDALE BANK PLC - GUERNSEY BRAN
COMMERZ TA DRESDNER	COMMERZBANK TRADING AS DRESDNER BAN
COMMERZBANK A G	COMMERZBANK AG
CONISTER BANK LTD	CONISTER BANK LTD
CONTIS FIN SERV LTD	CONTIS FINANCIAL SERVICES LIMITED
CO-OPERATIVE BANK	THE CO-OPERATIVE BANK PLC
COUTTS	COUTTS & CO
COVENTRY B/S	COVENTRY BUILDING SOCIETY
CREDEC	CREDEC LIMITED
CREDIS	CREDIS ACC LTD
CREDIT AGRICOLE C&I	CREDIT AGRICOLE CORPORATE & INVESTM
CREDIT INDUSTRIEL &C	Credit Industriel et Commercial
CREDIT SUISSE (GIB)	CREDIT SUISSE (GIBRALTAR) LIMITED
CREDIT SUISSE UK LTD	CREDIT SUISSE (UK) LIMITED
CREDIT SUISSE (GUERN)	CREDIT SUISSE (GUERNSEY) LTD
CROWN AGENTS	CROWN AGENTS BANK LIMITED
CUMBERLAND BLG SOC	CUMBERLAND BUILDING SOCIETY

Bank short name	Bank full name
CURRENCY CLOUD	THE CURRENCY CLOUD LIMITED
CYNERGY BANK LTD	CYNERGY BANK LIMITED
DANSKE BANK	DANSKE BANK A/S
DB UK BANK LIMITED	DB UK BANK LIMITED
DBS BANK LTD	DBS BANK LTD
DEUTSCHE BANK	DEUTSCHE BANK AG
DF CAPITAL BANK LTD	DF CAPITAL BANK LIMITED
DNB BANK ASA	DNB BANK ASA
DOZENS	DOZENS (A TRADING NAME OF PROJECT I
DUDLEY BLDG SOC	DUDLEY BUILDING SOCIETY
DUESDAY	DUESDAY LTD
DVLA	DEPARTMENT OF TRANSPORT (DVLA)
DYNAPAY	DYNAPAY LIMITED
DZ Bank AG, DZG bank	DZ Bank AG, Deutsche Zentral - Geno
DZING FINANCE	DZING FINANCE LIMITED
EBURY PARTNERS	EBURY PARTNERS UK LIMITED
ECOLOGY BUILDING SOC	ECOLOGY BUILDING SOCIETY
ECOMMBX	ECOMMBX LIMITED
EFG PRIVATE BANK LTD	EFG PRIVATE BANK LTD
EGG BANKING	EGG BANKING PLC
ELAVON	ELAVON FINANCIAL SERVICES DAC
EMIRATES NBD	EMIRATES NBD PJSC
ENUMIS LIMITED	ENUMIS LIMITED
ERSTE GROUP BANK AG	ERSTE GROUP BANK AG
ETORO MONEY UK LTD	ETORO MONEY UK LIMITED
EURO EXCHANGE	EURO EXCHANGE SECURITIES UK LIMITED
EUROBANK PRIVATE BK	EUROBANK PRIVATE BANK LUXEMBOURG S.
EUROCLEAR BANK	EUROCLEAR BANK SA/NV
Europe Arab Bank Plc	Europe Arab Bank Plc
FBN BANK UK LIMITED	FBN BANK UK LTD

Bank short name	Bank full name
FCMB	FCMB BANK (UK) LIMITED
FIDO FINANCE LTD	FIDO FINANCE LTD
FINECOBANK SPA	FINECOBANK SPA
FIRE FINANCIAL	FIRE FINANCIAL SERVICES LTD
FIRST ABU DHABI BANK	FIRST ABU DHABI BANK PJSC
FIRST COMMERCIAL BK	FIRST COMMERCIAL BANK
FIRSTRAND BANK LTD	FIRSTRAND BANK LIMITED, GUERNSEY BR
FONDY LIMITED	FONDY LIMITED
FROST MONEY LTD	FROST MONEY LTD
FURNESS BLD SOC	FURNESS BUILDING SOCIETY
GHANA INTERNATIONAL	GHANA INTERNATIONAL BANK PLC
GIBRALTAR INT BANK	GIBRALTAR INTERNATIONAL BANK LIMITE
GLOBAL EXCHANGE	GLOBAL EXCHANGE LIMITED
GLOBAL REACH	GLOBAL REACH PARTNERS LTD
GODIVA MORTGAGES	GODIVA MORTGAGES LIMITED
GOLDMAN SACHS INT BK	GOLDMAN SACHS INTERNATIONAL BANK
GOVERNMENT BANKING	GOVERNMENT BANKING
G-ROCK LIMITED	G-ROCK LIMITED
GS BANK USA LONDON	GOLDMAN SACHS BANK USA
GUARANTY TRUST BANK	GUARANTY TRUST BANK (UK) LIMITED
GUAVAPAY	GUAVAPAY LIMITED
GULF INTERNATIONALBK	GULF INTERNATIONAL BANK BSC
GULF INTL BANK (UK)	GULF INTERNATIONAL BANK (UK) LTD
HABIB BANK ZURICH	HABIB BANK ZURICH PLC
HALIFAX	HALIFAX (A TRADING NAME OF BANK OF
HAMPDEN & CO. PLC	HAMPDEN & CO. PLC
HAMPSHIRE TRUST BANK	HAMPSHIRE TRUST BANK PLC
HANDELSBANKEN	HANDELSBANKEN PLC
HANLEY ECONOMIC BS	HANLEY ECONOMIC BUILDING SOCIETY
HBL BANK UK LIMITED	HBL BANK UK LIMITED T/A HBL BANK UK

Bank short name	Bank full name
HMRC	Her Majesty's Revenue and Customs
HOMESEND	HOMESEND SCRL
HONGKONG SHANGHAI	THE HONGKONG AND SHANGHAI BANKING C
HSBC BANK INTER LTD	HSBC BANK INTERNATIONAL LTD
HSBC BANK PLC	HSBC BANK PLC
HSBC PRIVATE BANK	HSBC PRIVATE BANK (UK) LTD
HSBC PRIVATE BK CI	HSBC PRIVATE BANK (C.I.) LIMITED
HSBC UK BANK PLC	HSBC UK BANK PLC
Hua Nan Comm Bnk Ltd	Hua Nan Commercial Bank Ltd
IBP	INVESTEC BANK PLC
ICBC (LONDON) PLC	ICBC (LONDON) PLC
ICICI BANK UK PLC	ICICI BANK UK PLC
IFIC MONEY TRANSFER	IFIC MONEY TRANSFER (UK) LIMITED
IFX PAYMENTS	IFX PAYMENTS (A TRADING NAME OF IFX
INCOME GROUP	INCOME GROUP LIMITED
Ind Bk of Korea	Industrial Bank of Korea
ING BANK NV	ING BANK NV
Intesa Sanpaolo Spa	Intesa Sanpaolo Spa
INVESTEC BANK CI LTD	INVESTEC BANK CI LTD
ISLE OF MAN BANK	IOM BANK TRADING NAME OF ROYAL BANK
JNUK	JN BANK UK LIMITED
JORDAN INTERNTL BK.	JORDAN INTERNATIONAL BANK PLC
JP MORGAN AG	JP MORGAN AG
JP MORGAN BK LUX S.A	JP MORGAN BANK LUXEMBOURG S.A.
JP MORGAN CHASE BK	JP MORGAN CHASE BANK, N.A.
JP MORGAN EUROPE LTD	J P Morgan Europe Ltd
JPMORGAN CHASE BK	JPMORGAN CHASE BANK, N.A.
JULIAN HODGE BK LTD	JULIAN HODGE BANK LIMITED
JYSKE BANK GIBRALTAR	JYSKE BANK (GIBRALTAR) LTD
KBC BANK N.V.	KBC Bank NV

Bank short name	Bank full name
KDB LONDON	KOREA DEVELOPMENT BANK - LONDON BRA
KEB HANA BANK	KEB HANA BANK
KIYANPAY	KIYANPAY LTD
KOOKMIN BANK CO LTD	KOOKMIN BANK CO LTD, LONDON BRANCH
Kookmin Bnk Intl Ltd	Kookmin Bank International Limited
KROO LTD	KROO LTD
LANDES BADEN WURT	LANDESBANK BADEN-WURTTENBERG
LANDESBANK (HELABA)	LANDESBANK HESSEN-THURINGEN GIROZEN
LCH LIMITED	LCH LIMITED
LEATHERBACK LTD	LEATHERBACK LTD
LEEDS B S	LEEDS BUILDING SOCIETY
LEEK UNITED B/SOC	LEEK UNITED BUILDING SOCIETY
LHV	AS LHV PANK
LHV	AS LHV PANK FF
LLOYDS (INTL SERV)	LLOYDS BANK (INTERNATIONAL SERVICES)
LLOYDS BANK PLC	LLOYDS BANK PLC
LLOYDS BK CORP MKTS	LLOYDS BANK CORPORATE MARKETS PLC
LLOYDS INTERNATIONAL	LLOYDS BANK INTERNATIONAL (TRADING
LONDON COMM. CR. UN.	LONDON COMMUNITY CREDIT UNION LIMIT
LONDON MUTUAL CR. UN	LONDON MUTUAL CREDIT UNION LIMITED
LOUGHBOROUGH B S	LOUGHBOROUGH BUILDING SOCIETY
LQID	LQID LIMITED
M & S FINSERV PLC	MARKS AND SPENCER FINANCIAL SERVICE
MALAYAN BKG BERHAD	MALAYAN BANKING BERHAD
MARSDEN BUILDING SOC	MARSDEN BUILDING SOCIETY
MASTHAVEN	MASTHAVEN BANK LIMITED
MATLOCK BANK LTD	ANTHOS BANK B.V.
MBNA LIMITED	MBNA LIMITED
Mega Intl Comm Bnk	Mega International Commercial Bank
MERCANTILE CREDIT CO	MERCANTILE CREDIT COMPANY LIMITED

Bank short name	Bank full name
METRO BANK	METRO BANK PLC
METTLE	METTLE (TRADING NAME OF NATWEST)
MIDPOINT	MIDPOINT & TRANSFER LTD
MIRABAUD & CIE (EUR)	MIRABAUD & CIE (EUROPE) S.A.
MITSUBISHI UFJ TR BK	MITSUBISHI UFJ TRUST & BANKING CORP
MIZUHO CORPORATE BK	Mizuho Corporate Bank Ltd
MODULR	MODULR FS LIMITED
MONAVATE LIMITED	MONAVATE LIMITED
MONUMENT BANK LTD	MONUMENT BANK LIMITED
MONZO BANK LIMITED	MONZO BANK LIMITED
MTB	MIZRAHI TEFAHOT BANK LIMITED
MUFG BANK, LTD	MUFG BANK, LTD
Mypos	myPOS Europe Ltd
NAT BANK OF GREECE	NATIONAL BANK OF GREECE SA
NAT BK OF CANADA	NATIONAL BANK OF CANADA
NAT COUNTIES B/S	NATIONAL COUNTIES BUILDING SOCIETY
NAT WEST BANK PLC	NATIONAL WESTMINSTER BANK PLC
NATIONAL BANK EGYPT	NATIONAL BANK OF EGYPT (UK) LTD
NATIONAL BANK KUWAIT	NATIONAL BANK OF KUWAIT (INTERNATIO
NATIONWIDE BLDG SCTY	NATIONWIDE BUILDING SOCIETY
NATIONWIDE T/A DBS	NATIONWIDE BS T/A DUNFERMLINE BS
NATWEST MARKETS PLC	NATWEST MARKETS PLC
NATWEST PREMIER	NATIONAL WESTMINSTER BANK PLC T/A N
NBL T/A DANSKE BANK	NORTHERN BANK LIMITED T/A DANSKE BA
NEDBANK	NEDBANK LIMITED
NEDBANK PRIVATE WLTH	NEDBANK PRIVATE WEALTH LIMITED
NEWCASTLE B S	NEWCASTLE BUILDING SOCIETY
NORDEA BANK ABP	NORDEA BANK ABP
NORTHERN TRUST CO	THE NORTHERN TRUST COMPANY
Nottingham Bld Soc	Nottingham Building Society

Bank short name	Bank full name
NOVATUM TECH LIMITED	NOVATUM TECH LIMITED
NRAM LIMITED	NRAM LIMITED
NS&I	National Savings and Investments
NTGS SE	NORTHERN TRUST GLOBAL SERVICES SE
NVAYO	NVAYO LIMITED
OAKNORTH BANK PLC	OAKNORTH BANK PLC
OMEGA BAAP LIMITED	OMEGA BAAP LIMITED
OMNIO EMI LIMITED	OMNIO EMI LIMITED
ONESAVINGS BANK PLC	ONESAVINGS BANK PLC
OPTIMUS CARDS	OPTIMUS CARDS UK LIMITED
OVERSEAS CHINESE BK	OVERSEA-CHINESE BANKING CORPORATION
OXBURY BANK PLC	OXBURY BANK PLC
PARAM UK	PARAM UK (TRADING NAME OF PARAM UK
PAY PERFORM LIMITED	PAY PERFORM LIMITED
PAYMENTSSENSE	PAYMENTSSENSE LIMITED
PAYONEER EUROPE LTD	PAYONEER EUROPE LIMITED
PAYPAL EUROPE	PAYPAL (EUROPE) SARL ET CIE SCA
PAYRNET	PAYRNET LIMITED
PCF BANK LIMITED	PCF BANK LIMITED
PHILIPPINE NAT BK	PHILIPPINE NATIONAL BANK (EUROPE) P
PICTET & CIE EUROPE	PICTET & CIE (EUROPE) S.A.
POCKIT	POCKIT LIMITED
PREMFINA	PREMFINA LIMITED
PREPAID FINANCIAL	PREPAID FINANCIAL SERVICES LTD
PREPAY TECHNOLOGIES	PREPAY TECHNOLOGIES LTD
PRIVALGO	PRIVALGO LIMITED
PRIVAT 3	PRIVAT 3 MONEY LTD
PROGRESSIVE BLDG SOC	PROGRESSIVE BUILDING SOCIETY
PUNJAB NATIONAL BANK	PUNJAB NATIONAL BANK (INTERNATIONAL
QATAR NAT BK (QPSC)	QATAR NATIONAL BANK (Q.P.S.C.)

Bank short name	Bank full name
QIB (UK) PLC	QIB (UK) PLC
RABOBANK INTERNATION	RABOBANK INTERNATIONAL(COOPERATIVE
RAPYD	CASHDASH UK LIMITED
RATIONAL FX	RATIONAL FOREIGN EXCHANGE LIMITED
RBC EUROPE LTD	RBC EUROPE LIMITED
RBS INTERNTL LTD	THE ROYAL BANK OF SCOTLAND INTERNAT
RBS ONE ACCOUNT	RBS ONE ACCOUNT
RBSI TA COUTTS CROWN	THE ROYAL BANK OF SCOTLAND INTERNAT
REDWOOD BANK LTD	REDWOOD BANK LIMITED
RELIANCE BANK	RELIANCE BANK LTD
REVOLUT LTD	REVOLUT LTD
ROTHSCHILD & CO BANK	ROTHSCHILD & CO BANK LIMITED
ROYAL BANK OF CANADA	ROYAL BANK OF CANADA
ROYAL BANK OF SCOT	THE ROYAL BANK OF SCOTLAND PLC
SAESCADA	SAESCADA LIMITED
SAFENETPAY	SAFENETPAY SERVICES COMPANY LTD
SAINSBURYS BANK	SAINSBURY'S BANK PLC
Santander	Santander UK plc
SANTANDER CARDS UK	SANTANDER CARDS UK LIMITED
SANTANDER FIN SVCS	SANTANDER FINANCIAL SERVICES PLC JE
SANTANDER FIN SVCS	SANTANDER FINANCIAL SERVICES PLC
SCHRODER & CO LIMITED	SCHRODER & CO LIMITED
SCHRODERS (CI) LTD	SCHRODERS (CI) LTD
SECURE TRUST	SECURE TRUST BANK PLC
SENTENIAL LTD	SENTENIAL LTD (TRADING AS NUAPAY)
SG KLEINWORT CI LTD	SG KLEINWORT HAMBROS BANK (CI) LIM
SG KLEINWORT GIB LTD	SG KLEINWORT HAMBROS BANK (GIBRALTA
SG KLEINWORT HAM BK	SG KLEINWORT HAMBROS BANK LIMITED
SG KLEINWORT HAM CI	SG KLEINWORT HAMBROS BANK (CI) LIM
SHANGHAI COMM BANK	SHANGHAI COMMERCIAL BANK LTD

Bank short name	Bank full name
SHANGHAI PUDONG DEV	SHANGHAI PUDONG DEVELOPMENT BANK CO
SHAWBROOK BANK LTD	SHAWBROOK BANK LIMITED
SHINHAN BANK	SHINHAN BANK
SILICON VALLEY BANK	SILICON VALLEY BANK
SKANDINAVISKA ENS BK	SKANDINAVISKA ENSKILDA BANKEN AB (P
SKIPTON B/SOC	SKIPTON BUILDING SOCIETY
SMBC Europe Ltd	Sumitomo Mitsui Banking Corporation
SMITH & WILLIAMSON	SMITH & WILLIAMSON INVESTMENT SERVI
SOCIETE GENERALE	SOCIETE GENERALE
SOLDO FS LTD	SOLDO FINANCIAL SERVICES LIMITED
SPS LTD	SPECTRUM PAYMENT SERVICES LTD
SQUAREUP EUROPE LTD	SQUAREUP EUROPE LTD
STAN CHART BK JER	STANDARD CHARTERED BANK, JERSEY BRA
STANDARD BANK (SBIM)	STANDARD BANK ISLE OF MAN LTD
STANDARD CHARTERED	STANDARD CHARTERED BANK
STANDARD JERSEY	STANDARD BANK JERSEY LIMITED
STARLING BANK LTD	STARLING BANK LIMITED
STATE BANK OF INDIA	STATE BANK OF INDIA
STATE BK OF INDIA UK	STATE BANK OF INDIA (UK) LIMITED
STATE STREET BK & TR	STATE STREET BANK AND TRUST COMPANY
STRIPE PYMNTS UK LTD	STRIPE PAYMENTS UK LTD
SUFFOLK BUILDING SOC	SUFFOLK BUILDING SOCIETY
SUMITOMO TRUST + BK	THE SUMITOMO TRUST & BANKING CO LTD
SWANSEA BLDG SOCY	SWANSEA BUILDING SOCIETY
SWAPMONEY	SWAPMONEY LTD
T C ZIRAAT BANKASI	T C ZIRAAT BANKASI AS
TALKREMIT	TALKREMIT LTD
TANDEM BANK LTD.	TANDEM BANK LIMITED
TANGOPAY	TANGOPAY LIMITED
TESCO BANK	TESCO PERSONAL FINANCE PLC

Bank short name	Bank full name
THE ACCESS BK UK LTD	THE ACCESS BANK UK LIMITED
THE CHARITY BANK LTD	THE CHARITY BANK LTD
THE NORINCHUKIN BANK	THE NORINCHUKIN BANK
THINK MONEY LTD	THINK MONEY LIMITED
TOMPAY LIMITED	TOMPAY LIMITED
TRANSACT PAYMENTS	TRANSACT PAYMENTS LIMITED
TRIODOS BANK UK LTD	TRIODOS BANK UK LTD
TRUELAYER LIMITED	TRUELAYER LIMITED
TRUEVO PAYMENTS	TRUEVO PAYMENTS LTD
TSB	TSB BANK PLC
TURKISH BANK (UK) LTD	TURKISH BANK (UK) LTD
TURKIYE IS BANKASI	TURKIYE IS BANKASI AS
UBS AG	UBS AG
ULSTER BANK	NATIONAL WESTMINSTER BANK PLC T/A U
UN BANC PRIVEE UBPSA	UNION BANCAIRE PRIVEE UBP SA
UNICREDIT BANK AG	UNICREDIT BANK AG
UNICREDIT S.P.A	UNICREDIT S.P.A
UNION BANK UK PLC	UNION BANK UK PLC
UNION BK OF INDIA	UNION BANK OF INDIA (UK) LIMITED
UNITED NAT BANK	UNITED NATIONAL BANK LIMITED
UNITED TRUST BK LTD	UNITED TRUST BANK LIMITED
UNITY TRUST BANK PLC	UNITY TRUST BANK PLC
UNT OVERSEAS BK LTD	UNITED OVERSEAS BANK LTD
USI MONEY	UNIVERSAL SECURITIES AND INVESTMENT
VANQUIS BANK LIMITED	VANQUIS BANK LIMITED
VFX FINANCIAL PLC	VFX FINANCIAL PLC
VIOLA MONEY	VIOLA MONEY (EUROPE) LTD
VITESSE PSP	VITESSE PSP LIMITED
VIVA PAYMENTS	VIVA PAYMENTS SERVICES S.A.
VIVE (GH BANK)	VIVE (A TRADING NAME OF GH BANK LIM

Bank short name	Bank full name
VM CLYDESDALEBANKPLC	VIRGIN MONEY (CLYDESDALE BANK PLC)
VOYAGER ALLIANCE CU	VOYAGER ALLIANCE CREDIT UNION LIMIT
VTB Capital Plc	VTB Capital Plc
WEALTHKERNEL LTD	WEALTHKERNEL LTD
WEATHERBYS BANK LTD	WEATHERBYS BANK LTD
Wells Fargo Bank NA	Wells Fargo Bank NA
Wesleyan Bank Ltd	Wesleyan Bank Limited
WEST BROMWICH B/S	WEST BROMWICH BUILDING SOCIETY
WIREPAYER	WIREPAYER LIMITED
WISE PAYMENTS LTD	WISE PAYMENTS LIMITED
WOORI BANK	WOORI BANK
WORLD FIRST UK LTD	WORLD FIRST UK LTD
WYELANDS BANK PLC	WYELANDS BANK PLC
XACE	XACE LIMITED
YORKSHIRE BANK	YORKSHIRE BANK (A TRADING NAME OF C
YORKSHIRE BUILD SOCY	YORKSHIRE BUILDING SOCIETY
Zenith Bnk uk Ltd	ZENITH BANK (UK) LIMITED
ZIGLU	ZIGLU LIMITED
ZOPA BANK LIMITED	ZOPA BANK LIMITED
ZOPA LIMITED	ZOPA LIMITED

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