

Figure 1: The Metric C process

1	First PSR reporting day	The 14 directed sending PSPs to submit Metric C data on receiving PSPs to the PSR.	Fri 16 Feb 2024
2	Aggregation and shortlist of 25 firms	The PSR aggregates total results for each receiving PSP and shortlists the 25 worst-performing firms by absolute value and volume. These 25 firms are notified and provided with their Metric C data broken down by each of the 14 sending PSPs.	Tue 27 Feb 2024
3	Receiving PSPs optionally challenge data with sending PSPs	Deadline for receiving PSPs to check data and request from sending PSPs: <ul style="list-style-type: none"> • a full transactions file/detailed supporting data • evidence/breakdowns, in particular regarding frauds 	Tue 12 Mar 2024
4	Sending PSPs provide requested transaction-level data	Deadline for sending PSPs to provide breakdown of fraud at transaction level to receiving PSPs.	Tue 26 Mar 2024
5	Sponsor PSPs submit provisional disaggregated indirect PSP data to the PSR	Receiving PSPs who receive funds on behalf of indirect PSPs (sponsor PSPs) should provide a provisional breakdown of their results by each indirect PSP itself to the PSR.	Thu 11 Apr 2024
6	Receiving PSPs request changes	Deadline for receiving PSPs to submit requests for revision to sending PSPs supported by reasons and, where possible, evidence.	Mon 22 Apr 2024
7	Final PSR reporting day	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 to the PSR. The sending PSPs must also communicate any changes made to the data to the respective receiving PSPs, especially sponsor banks.	Tue 21 May 2024
8	Sponsor PSPs submit final disaggregated indirect PSP data to the PSR	Sponsor PSPs should submit final disaggregated indirect PSP data to the PSR, incorporating any changes made by sending banks.	Mon 3 Jun 2024
9	PSR publishes APP fraud report	Published information will be drawn from the data of the final 20 most significant PSPs, by both value and volume. Receiving PSPs whose data will be published in our report will be notified ahead of publication.	Jul 2024

Details of the process

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

We select firms and compile final lists for publication

5.7 Once the 14 directed sending PSPs have given us their data, (including data for receiving PSPs identified at the Short Bank Name level), 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 absolute amounts of scams (not rates of scams). This will ensure the biggest impact through our intervention.

5.8 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.

5.9 The 25 specified receiving PSPs have the opportunity to check 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.

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

5.11 At the end of the Metric C process, we will publish 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.

5.12 As a result of the checking and revision of data under the Metric C process, the shortlist (based on absolute levels of scams received) of PSPs may change. Indeed, some PSPs may even leave the shortlist, while others may be added to it. In particular, where a sponsor PSP chooses to disaggregate its data by indirect PSPs (and the PSR accepts this disaggregation), this may lead to the sponsor's own absolute levels of scam receipts falling outside the shortlist. In this case, the sponsor may exit the shortlist. However, where a sponsor exits, this may lead to other receiving PSPs (which could include indirect PSPs, where they have significant absolute levels of scam receipts) entering the shortlist.

Timelines and reporting periods

5.13 Cycle 2 will cover both H1 2023 and H2 2023. We will require PSPs to prepare data between February 2024 and June 2024, and we intend to publish the second cycle of data in July 2024 (see Annex 1).

Contact list

- 5.14** To assist receiving and sending PSPs contacting each other during the checking process (from Step 3 onwards), we have compiled a list of contact details for the PSPs involved. We have asked PSPs to provide a nominated contact, perhaps from within their fraud or data analysis teams, who is responsible for the Metric C process. Where possible, we also provide a secondary contact, as a back-up. It is the PSP's responsibility to ensure that they keep the PSR updated if there are changes to their nominated contact.

Data-sharing agreements

- 5.15** By necessity, the Metric C process means both sending and receiving PSPs must share data. This data may be aggregated to varying degrees, or it may be the underlying transaction data (including personal data). Such data may be subject to data protection requirements, including the General Data Protection Regulation (GDPR).⁸ This data may need to be shared and held securely, and destroyed after a suitable period.
- 5.16** During cycle 1, directed PSPs worked on a pragmatic basis to establish bi-lateral data-sharing agreements, or took other steps to mitigate the risks.
- 5.17** For the second and potential future cycles, the PSR does not intend to develop and agree a single, industry-wide data-sharing agreement.
- 5.18** We have set out the relevant legal and regulatory requirements, including the objective and powers, in Specific Direction 18.⁹ See in particular, paragraphs 1.4, 2.4 and 7.2.

Data fields and template – for checking

- 5.19** At Step 4 of the process, sending PSPs must supply data to receiving PSPs, in response to their request to check the data. Throughout the remainder of the process, both sending and receiving PSPs may be exchanging data iteratively, as they seek to check the results. There are benefits in standardising this process:
- receiving PSPs receive at least the minimum amount of data necessary to check their data
 - a single set of data fields and formats are used, to simplify the processing of that information
 - where a sending or receiving firm is dealing with data relating to multiple firms, it can automate the process by reference to a standard format of spreadsheet (rather than having to adapt to many different formats if each firm uses a different approach)
- 5.20** To aid this process, we have set out a standard set of data fields (See Annex 3) and a standard data checking Excel template (published alongside this guidance).
- 5.21** We have mandated the key data fields. For other data fields, we have suggested these, but they are optional since not all firms may have data relating to these fields.

8 www.gov.uk/data-protection

9 [Specific Direction 18](#) published March 2023.

- 5.22** For the template, it is important that firms avoid making any changes where possible or keep these to a minimum. This will make it easier for PSPs to automate the processing of this data upon receipt, since they can specify their routines against a standard template.
- 5.23** The guiding principle for PSPs providing data via these data fields and templates is that, as a minimum, they should provide enough data to uniquely identify the transaction concerned. The systems and the data fields used vary amongst PSPs. However, providing the Faster Payments transaction ID or sort code and account number should be sufficient to uniquely identify the transaction.
- 5.24** Where there is a request by the recipient PSP on any specific payments due to reconciliation difficulties, information that the sending PSP holds that would constitute optional data should be given to the recipient PSP. This should be dealt with on a case-by-case basis, not a blanket request for more information of all APP scams from any sending institution.

Disputes between sending PSPs and receiving PSPs

- 5.25** To ensure that the Metric C data remains relevant when published, we want to avoid lengthy delays before publishing the results. 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.
- 5.26** To keep the checking process balanced, receiving PSPs should only make one request to each 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.
- 5.27** 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.

Threshold for challenges to the data by receiving PSPs

- 5.28** Directed PSPs are only required to consider challenges from receiving PSPs where they lead to a material change in their data. (See paragraphs 7.2(c) and 7.4 of Specific Direction 18). And therefore, receiving PSPs should only request changes where they are above this threshold.
- 5.29** We set the threshold here in this guidance. The level is a 5% change.
- 5.30** Specifically, the 5% change relates to a change in any of the items of information listed under the receiving-PSP information, at paragraph 6.2(b) of Specific Direction 18.
- 5.31** **Example:** the directed PSP states that the total value of APP scam payments it has sent to the receiving PSP is £100. If the receiving PSP submits a claim to the directed PSP, backed by evidence, that the true value was only £94, then the directed PSP must consider this claim. This is because the change is greater than 5% of the original value. However, if the receiving PSP claims that the value was £98, then the directed PSP is not required to consider the claim. This is because the change is less than 5% of the original value.

Receiving PSPs should provide clear reasons for challenge

- 5.32** During cycle 1, some directed PSPs indicated that at Step 3 of the Metric C process, when some receiving PSPs were requesting data, they did not always explain why they were challenging the data.
- 5.33** We have therefore introduced an additional requirement for receiving PSPs to set out the grounds for their challenge when they are requesting further data from the directed PSP at Step 3 of the process. For example, a receiving PSP might state that its data differs by more than 5% from the data supplied by the directed PSP, and that therefore their difference is above the materiality threshold for challenges. In this case, the receiving PSP should confirm its calculation by stating the value of the data that it is expecting from its own records – and how it has calculated that this exceeds the 5% materiality limit.
- 5.34** Where sponsor PSPs are seeking additional information from directed PSPs, in order to allow them to disaggregate their results across their indirect PSPs, there is no need for them to provide a justification to directed PSPs. Disaggregation is an integral part of the process. Directed PSPs should endeavour as a minimum to provide enough information to identify transactions, so that sponsors can promptly provide a provisional disaggregation at Step 5.

Indirect PSPs

- 5.35** Many receiving PSPs are not 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.
- 5.36** 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.
- 5.37** For Metric C data, sending PSPs may be asked to 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.
- 5.38** 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.
- 5.39** 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 PSPs

Guidance defined in Specific Direction 18

- 5.40** This guidance should be read in conjunction with Specific Direction 18. Where elements of the direction are relevant to this guidance, they apply. We have not repeated them here.
- 5.41** Where terms are defined in the direction, we have also applied them in this guidance.
- 5.42** We have set out, in earlier sections of this reporting guidance, the other guidance that is relevant to PSPs and the hierarchy in which this applies.

Scope

- 5.43** This guidance applies to directed PSPs and all specified receiving PSPs. A specified receiving PSP is defined in Specific Direction 18.
- 5.44** This guidance is considered best practice of the steps that both directed and specified receiving PSPs should take.
- 5.45** Receiving PSPs will be identified at the Short Bank Name and Short Branch Title/sort code level via the Extended Industry Sort Code Directory (EISCD) listing. The PSR will compile the initial shortlist of 25 receiving PSPs at Step 2, based on the Short Bank Name level. However, directed PSPs and receiving PSPs may use more granular data as needed, for example, including Short Branch Title and sort code.

Notification of specified receiving PSPs (Step 2)

- 5.46** 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.
- 5.47** Subject to receiving the relevant data on time, we will write to specified PSPs within eight working days from the first PSR reporting day.

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

- 5.48** 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 scam and breakdowns of their Metric C data.
- 5.49** 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.
- 5.50** Sponsor PSPs that are seeking additional information from directed PSPs, in order to allow them to disaggregate their results across their indirect PSPs, do not need to provide a justification for their request.
- 5.51** Receiving PSPs are able to begin making their requests for more information to a directed PSP as soon as they are notified of their Metric C numbers by the PSR but no later than the Step 3 deadline.

Directed PSPs to provide breakdown of receiving PSP data (Step 4)

- 5.52** Following requests for further information from the specified receiving PSPs shortlisted in Step 2, directed PSPs are required to respond and provide a breakdown of scams at transaction level and any other relevant information to the receiving PSPs.
- 5.53** Directed PSPs should aim to respond to all requests by no later than the Step 4 deadline.

Provisional disaggregation (Step 5)

- 5.54** As explained above in Chapter 3 (under the heading *Sponsor banks and agency banks*), sponsor PSPs, where they are able to, should disaggregate their data.
- 5.55** Sponsor PSPs should provide a provisional disaggregated list of indirect PSPs and their results to us, by the deadline outlined in Step 5. (The data will only be provisional at this stage, since sponsor PSPs and directed PSPs will not have concluded the checking process until Step 7.)
- 5.56** Sponsor PSPs should also provide the final list of indirect PSPs and their results to us at Step 8.
- 5.57** Early receipt of the provisionally disaggregated data will help us to identify, at an early stage, significant indirect PSPs who may be included in the final publication list. This will help us in compiling provisional rankings during the process and allow us to contact such indirect PSPs directly to discuss their APP scams data.
- 5.58** Sponsor PSPs should also engage with their indirect PSPs at the earliest possible moment after Steps 2 and 4, to provide them with details of their scam receipts and enable them to challenge this data, should they wish to.

Receiving PSPs submit requests for changes to the directed PSPs (Step 6)

- 5.59** 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.
- 5.60** A request may only be made once during the process. Therefore, receiving PSPs should ensure that the request is supported as fully as possible.
- 5.61** Requests are allowed to be made anytime between when the directed PSP provides the breakdown of scams to the receiving PSP and the deadline outlined in Step 6.
- 5.62** A request for a change need only be considered by a directed PSP if it leads to more than a 5% change (the threshold) in the information being challenged. (See paragraphs 5.18 to 5.21 above and paragraphs 7.2(c) and 7.4 of Specific Direction 18.)

Revised data, accompanying explanation and supporting evidence (Step 7)

- 5.63** 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. The receiving PSPs should be informed of any changes to their data or lack thereof by the **final PSR reporting day**.

- 5.64** It is of vital importance that any changes in data are communicated to the receiving PSP by the aforementioned deadline. This is especially true in the case of sponsors who will need to disaggregate final revised data among their indirect participants and provide the disaggregation to the PSR (Step 8).
- 5.65** The directed PSP must also submit the final revised data to the PSR by the **final PSR reporting day**.

Indirect PSP information (Step 8)

- 5.66** Incorporating any changes made to their data by sending PSPs in Step 7, sponsor PSPs should provide a final disaggregation of their revised data to the PSR, accompanied by explanations and supporting evidence. The PSR will consider this information and, if satisfied as to its validity, will publish disaggregated results for that sponsor.

As indicated above, sponsors should provide provisionally disaggregated data to the PSR no later than the Step 5 deadline and the final disaggregated data no later than the Step 8 deadline.

Commentaries following receipt of final rankings

- 5.67** As explained in paragraph 3.37, specified receiving PSPs, if they would like to, can submit commentaries to us following the submission by the sending PSP of their final results at Step 7.

PSR notifies receiving PSPs that their data will be published (Step 9)

- 5.68** 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. The PSR will also inform any receiving PSPs that fall out of the shortlist for publication.
- 5.69** The PSR will do this after the final PSR reporting day and no later than two working days before the date of publication.

6 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 the accompanying Annex 2 provide further details.

Background

- 6.1** 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.
- 6.2** The PSR will supplement this with some basic sense checks over the submissions that we receive.

CFO (or equivalent) sign-off

- 6.3** Directed PSPs should submit a statement of assurance, signed by their CFO, along with their data submission.
- 6.4** 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 PSP objective set out in this document.
- 6.5** CFOs may note any areas of concern, omissions, estimates or departures from the reporting guidance, should that be applicable.
- 6.6** 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 – Cycle 2 timetable

(H1 23 and H2 23)

This annex sets out the key deadlines in the reporting process for the second reporting cycle.

Timetable: second reporting cycle

Step	Action	Timing
1	PSR to receive data from 14 directed sending PSPs First PSR reporting day	Friday 16 February 2024
2	PSR to contact the 25 PSPs who are the most significant receiving PSPs (and to provide a breakdown of their results by each of the 14 sending PSPs)	Tuesday 27 February 2024
3	Deadline for receiving PSPs to check data and request breakdowns from sending PSPs	Tuesday 12 March 2024
4	Deadline for sending PSPs to provide breakdown of scams at transaction level	Tuesday 26 March 2024
5	Sponsor PSPs should submit provisional disaggregated indirect PSP data to the PSR	Thursday 11 April 2024
6	Deadline for receiving PSPs to review detailed breakdown and submit requests for revision to sending PSPs	Monday 22 April 2024
7	Sending PSPs consider requests for revisions, re-submit revised data to PSR, and communicate changes made at the transaction level to the receiving PSPs especially to sponsor banks Final PSR reporting day	Tuesday 21 May 2024
8	Sponsor PSPs may submit final disaggregated indirect PSP data to the PSR, incorporating any changes made by sending banks	Monday 3 June 2024
9	PSR to review the data, prudential considerations, and prepare publication formats as well as inform the specified receiving PSPs whose data will be published in our report Publication month	July 2024

Reporting period: second reporting cycle

- H1 2023 and H2 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) scams data collection under Specific Direction 18

I confirm to the best of my knowledge that:

- our APP scams reporting submitted to you, as detailed above, is complete and accurate, and has been properly prepared in accordance with Specific Direction 18 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

Data fields

This annex sets out the mandatory and optional data fields that PSPs should use when exchanging data during the checking process.

Template

- 3.1** We have set out a standard Excel template, published alongside this reporting guidance, which should be used by all PSPs when exchanging data for checking. This will help firms to automate the processing of data.
- 3.2** The template has been updated following feedback from our consultation CP23/5. This will be published alongside this guidance.

Mandatory data fields

- 3.3** PSPs should choose one from the following mandatory data fields:
- The 42-character Faster Payments transaction ID.
 - Sending PSP sort code and account number and Receiving PSP sort code and account number.
- 3.4** If, under 3.2, the sending PSP provided the 42-character Faster Payments transaction ID, it will also need to provide:
- Receiving PSP Short Bank Name or sort code.
 - Faster Payments transaction date.
 - Transaction amount.
- 3.5** If, under 3.2, the sending PSP provided the sort code and account number or the sending and receiving PSP, it will also need to provide:
- Faster Payments transaction date.
 - The date the scam was reported to the receiving PSP.
 - Transaction amount.

Optional data fields

3.6 PSPs may complete the following optional data fields. These are not required:

- Number of linked Faster Payments transaction IDs.
- Linked Faster Payments transaction IDs.
- Case identification number (only available for BPS users).
- Category of the APP scam.
- Date the scam was reported to the sending PSP.
- Sending PSP comments (anything the sending PSP wants to flag to the receiving PSP that will help them to identify the transaction).

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