



The voice of banking

**BBA Response to the Payments Strategy Forum's  
*Being responsive to user needs:  
A draft strategy for consultation***

14 September 2016

Sent via e-mail to: [forum@psr.org.uk](mailto:forum@psr.org.uk)

Dear Sir/Madam

The BBA is the leading trade association for the UK banking sector with 200 member banks headquartered in over 50 countries with operations in 180 jurisdictions worldwide. Eighty per cent of global systemically important banks are members of the BBA. As the representative of the world's largest international banking cluster the BBA is the voice of UK banking.

We have the largest and most comprehensive policy resources for banks in the UK and represent our members domestically, in Europe and on the global stage. Our network also includes over 80 of the world's leading financial and professional services organisations. Our members manage more than £7 trillion in UK banking assets, employ nearly half a million individuals nationally, contribute over £60 billion to the UK economy each year and lend over £150 billion to UK businesses.

**Introduction**

BBA supports the work of the Payment Strategy Forum, and welcomes the chance to comment on the draft Strategy. A wide range of our members have been active in contributing towards the response by Payments UK and other trade bodies, and as such BBA's response is a high level reflection on the consultation and future direction and implementation of the Strategy.

**Comments**

In particular we welcome the work of the Forum in bringing together the wide ranging discussions that have helped to form the draft Strategy. We believe that engaging with a wide variety of stakeholders is the right approach in developing what is an innovative vision and potentially highly impactful future strategy for the industry.

We note that the Strategy is highly innovative, and we welcome that it builds on many of the proposals contained in previous publications, such as Payment UK's World Class Payments Report.

While we certainly believe that there is significant merit in setting out and agreeing a long term vision, we believe that a degree of collective prioritisation will be necessary in order to successfully deliver meaningful change in the shorter to medium term.

In being so innovative, the solutions presented in the Strategy remains largely untested. BBA believes that there are inherent risks in developing such an innovative and 'green' strategy,

to which the Forum, Regulators and other stakeholders ought to consider when taking the Strategy forward. In particular, exploring ways to bring forward significant developments will need to be balanced carefully with the overriding priority to retain and build upon the existing high levels of resilience and reliability of payments systems.

Given the innovative nature of many of the proposals, it will be vital to build detailed analysis and information concerning the practical and technical considerations needed, firstly to prioritise the most impactful solutions, and then to underpin successful implementation. For all the proposals it will be essential for the industry to undertake a credible assessment of the business case for any change, and the likelihood and potential impact of risks that might arise.

It will be vital for the various stakeholders to remain closely and collaboratively engaged in the delivery of the Strategy over the longer term for it to be successful. There will be an important role for the Forum in achieving that engagement, and in monitoring and communicating progress towards the vision.

We look forward to further engaging in the development of the Forum's strategy and in its implementation. If there are any questions arising from this response, we would of course be delighted to discuss these further with you.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'E Willars', written in a cursive style.

Ewan Willars

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