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Payments Strategy Forum

Forum update
13 November 2017



Agenda

	Paper No	Lead(s)
Ai. 0 Welcome; objectives; apologies; conflicts of interest	Verbal	Ruth Evans
Ai.1 Minutes and actions	4 – 5	Ruth Evans
Ai.2 Consultation responses		PSF Programme Team and workstream leads
Ai.3 Programme Plan	9 – 19	Working Group Chairs and leads
Ai.4 Risk assessment	20 – 27	Becky Clements / Richard De La Rue
Ai.5 Forum event		Forum Secretariat
Appendix	28 – 33	
AOB	Verbal	Ruth Evans



Ai.1 Minutes and actions

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Open forum actions log (1/2)

Action Ref	Action Description	Action Owner	Meeting Raised	Status	Status Update
ID047	PSF Central Team to ensure that the final 'handover' deliverable is a final and detailed NPA blueprint.	PSF Central Team	12 July Forum	In progress	29th September 2017 Forum agreed to keep open until final deliverables are agreed.
ID048	The Forum Secretariat to ensure that Thaer Sabri's concerns are accurately reflected in the minutes.	Secretariat	29 Sept Forum	To be closed	06th November 2017 Draft minutes circulated to the Forum on 13 th October. No comments received from TS. Action to be closed.
ID049	Katy Worobec to raise the concerns discussed at the Forum within UK Finance and work with Richard De La Rue to provide a written update to the next Forum meeting. This should cover concerns on the potential lack of communications from UK Finance regarding information handling by PSPs in light of PSD2 and Open Banking; Thaer Sabri's concerns regarding information sharing and identity guidelines; and how UK Finance plans to measure the effectiveness of the education and awareness campaign.	Russell Saunders	29 Sept Forum	Open	06th November Update to be given at the 13 th November meeting.
ID050	Becky Clements and Richard De La Rue to present on the latest status of the risk assessment at the next Forum meeting.	Becky Clements / Richard De La Rue	29 Sept Forum	To be closed	06th November 2017 Included on the 13 th November agenda. Action to be closed.
ID051	NPA Design Hub, with support from the PSF Central Team, to develop an external communication regarding Direct Debits, and the implication of the "push only rail" and Request to Pay. Once agreed the Forum Secretariat to distribute.	Otto Benz	29 Sept Forum	To be closed	06th November 2017 Communication issued to the Payments Community and posted on the Forum's website on 19 th October. Action to be closed.

Open forum actions log (2/2)

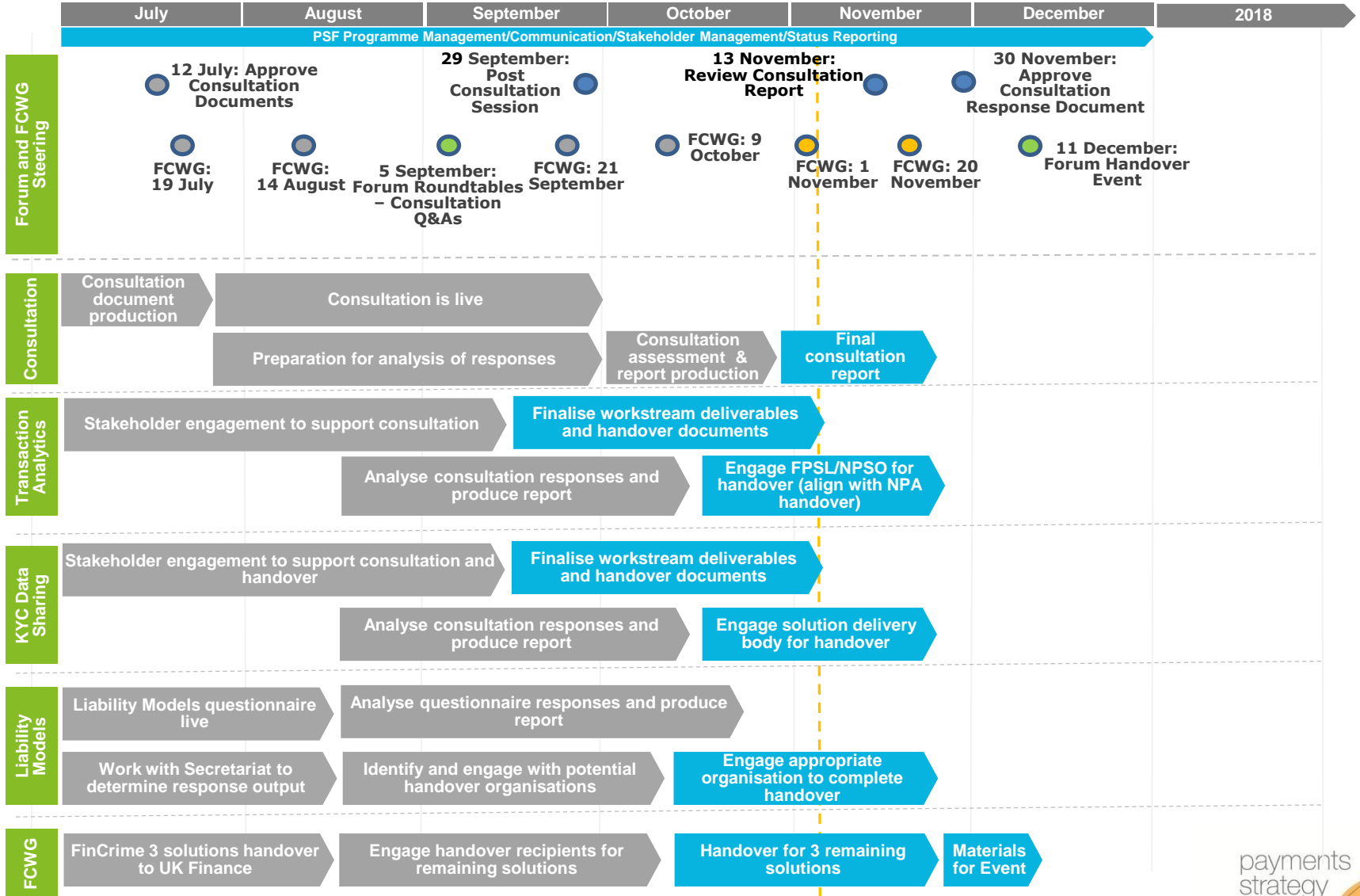
Action Ref	Action Description	Action Owner	Meeting Raised	Status	Status Update
ID052	PSF Central Team, when analysing consultation responses, to clearly identify any areas where the majority of responses were negative and then agree messaging to address these. Where necessary this should happen prior to the final Report.	PSF Central Team	29 Sept Forum	In progress	06th November 2017 Draft consultation assessment report and messaging to be discussed at the November 13 th meeting. Action to remain open until the Forum agrees the final report.
ID053	PSF Central Team to ensure the final report clearly and accurately articulates the feedback from the Payments Community, and how the Forum considered and addressed this in the final Blueprint.	PSF Central Team	29 Sept Forum	In progress	06th November 2017 Draft consultation assessment report to be discussed at the November 13 th meeting. Action to remain open until the Forum agrees the final report.






Ai.3.1 Financial Crime Programme Plan

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FCWG High Level Plan to December



FCWG Programme Update

Improving Trust in Payments		
Status	Requested Actions	RAG
<p>1. Transaction Data Analytics:</p> <p><i>Workstream Deliverables:</i> Finalised drafts are being reviewed with working group and socialised with key stakeholders</p> <p><i>Stakeholder Engagement:</i> Roundtable held on the 8th November attended by responders to the consultation and FPSL / NPSO</p> <p><i>Handover:</i> A meeting has been held to commence the steps to progress handover of the solution to the NPSO</p>	<p>FCWG seek the approval of the Forum to formally request the NPSO to take the solution forward and handover to be completed prior to the 11th December handover event</p>	
<p>2. Trusted KYC Data Sharing:</p> <p><i>Workstream Deliverables:</i> Finalised drafts are being reviewed with working group and socialised with key stakeholders</p> <p><i>Handover:</i> The solution was presented at a UK Finance workshop on the 9th November, to further understand the solution and present it to a number of their members for endorsement. The workshop is intended to ensure that the vision for the solution is clearly aligned with UK Finance's strategy.</p>	<p>FCWG seek the approval of the Forum to formally request UK Finance to take the solution forward, and handover to be completed prior to the 11th December handover event</p>	
<p>3. Liability Models for Indirect Access:</p> <p><i>Stakeholder Engagement:</i> A roundtable was held on the 11th October where the analysis of the questionnaire responses and the recommended next steps were presented to representatives of providers, indirect PSPs and Trade Bodies as well as regulators.</p> <p><i>Handover:</i> UK Finance have requested a workshop on the 13th November to fully understand the solution proposal and next steps*, to ensure that handover transition is effective.</p>	<p>FCWG seek the approval of the Forum to formally request UK Finance to take the solution forward, and handover to be completed prior to the 11th December handover event</p>	

* Summary analysis, recommendations and next steps are included in the supporting materials

Financial Crime – Key Risks and Issues

- The following high level risks have been identified and applicable to all solutions:
 - **Closed: Risk that consultation response are not supportive of the solution design and therefore the new entity/body will not take forward**
 - Risk that the PSF handover documents do not sufficiently or correctly describe the required activity to deliver the benefits (e.g. design flaws, impractical implementation approach).
 - Risk that solutions are not taken forward by the new entity
 - Risk that without seed money the new entity will not take forward and therefore acceptance is subject to finance/board and delays acceptance until early 2018
 - Risk that the key stakeholders and governance in the new entity are not in place or have not committed to handover prior to the dissolution of the PSF
 - Risk that solution design implemented by the new entity deviates from the PSF and doesn't address detriments as per PSF design
- Each solution will take individual steps to mitigate these risks as outlined in the following slides.

Financial Crime documents

The Financial Crime supporting documents consist of the following documents. Three documents will be published on the PSF website on 8th December: Transaction Analytics – Strategic solution, KYC Data Sharing and Liability Models.

Financial Crime supporting documents

Document name	Date	Description
1. Transaction Analytics: Tactical	June 2017	No changes to the document already published on the PSF website.
2. Transaction Analytics: Strategic	December 2017	To be published by 8th December 2017
3. KYC Data Sharing	December 2017	To be published by 8th December 2017
4. Information Sharing	July 2017	No changes to the document already published on the PSF website.
5. Liability Models	December 2017	To be published by 8th December 2017
6. Identity Guidelines	June 2017	No changes to the document already published on the PSF website.
7. Sanctions Data	June 2017	No changes to the document already published on the PSF website.
8. Customer Education	March 2017	No changes to the document already published on the PSF website.

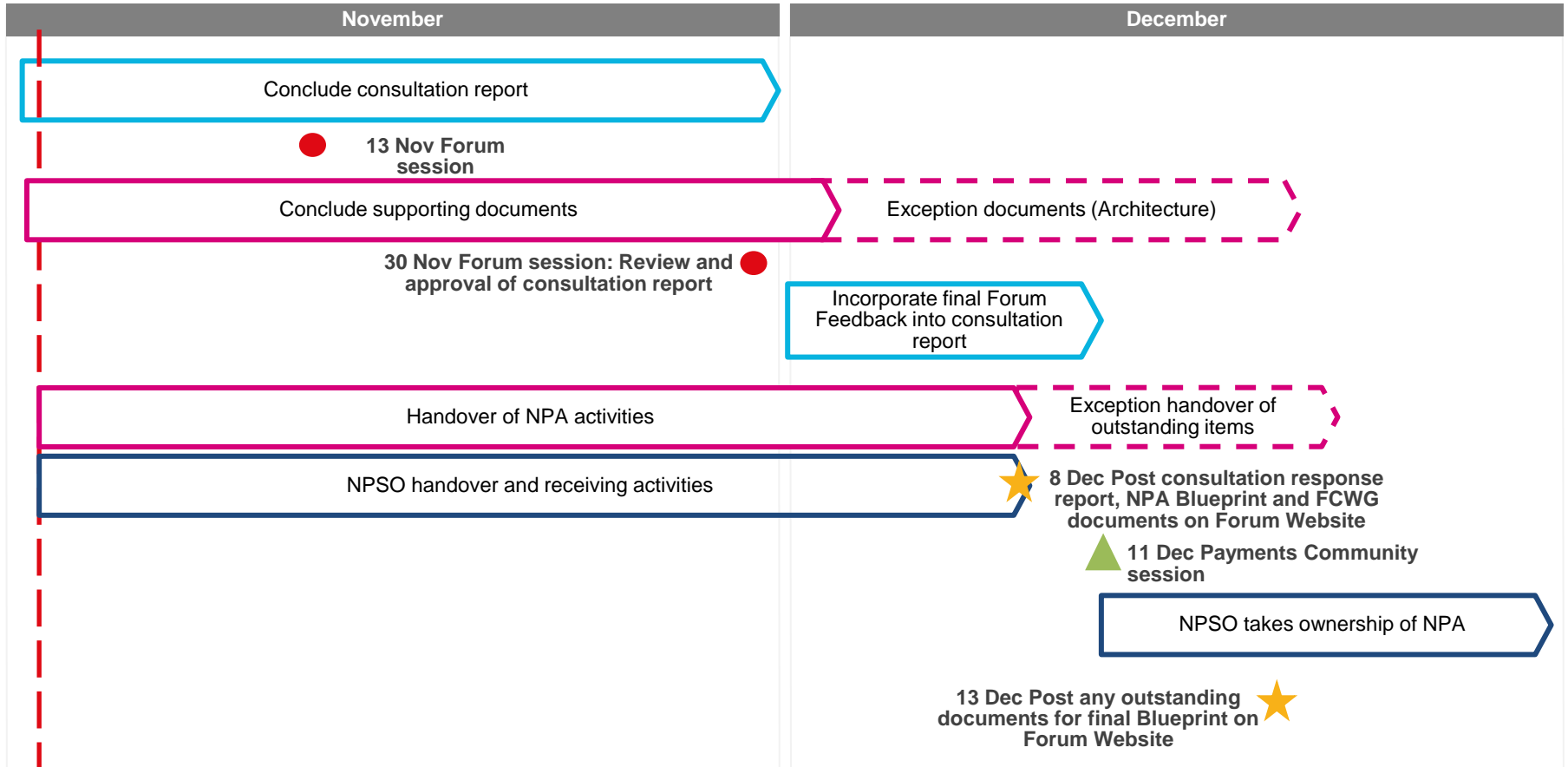


Ai.3.2 NPA Programme Plan


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Schedule of NPA activities (responsibilities to be agreed with Forum)

Below is the high-level timeline showing activities and responsibilities until the closure of the Forum:

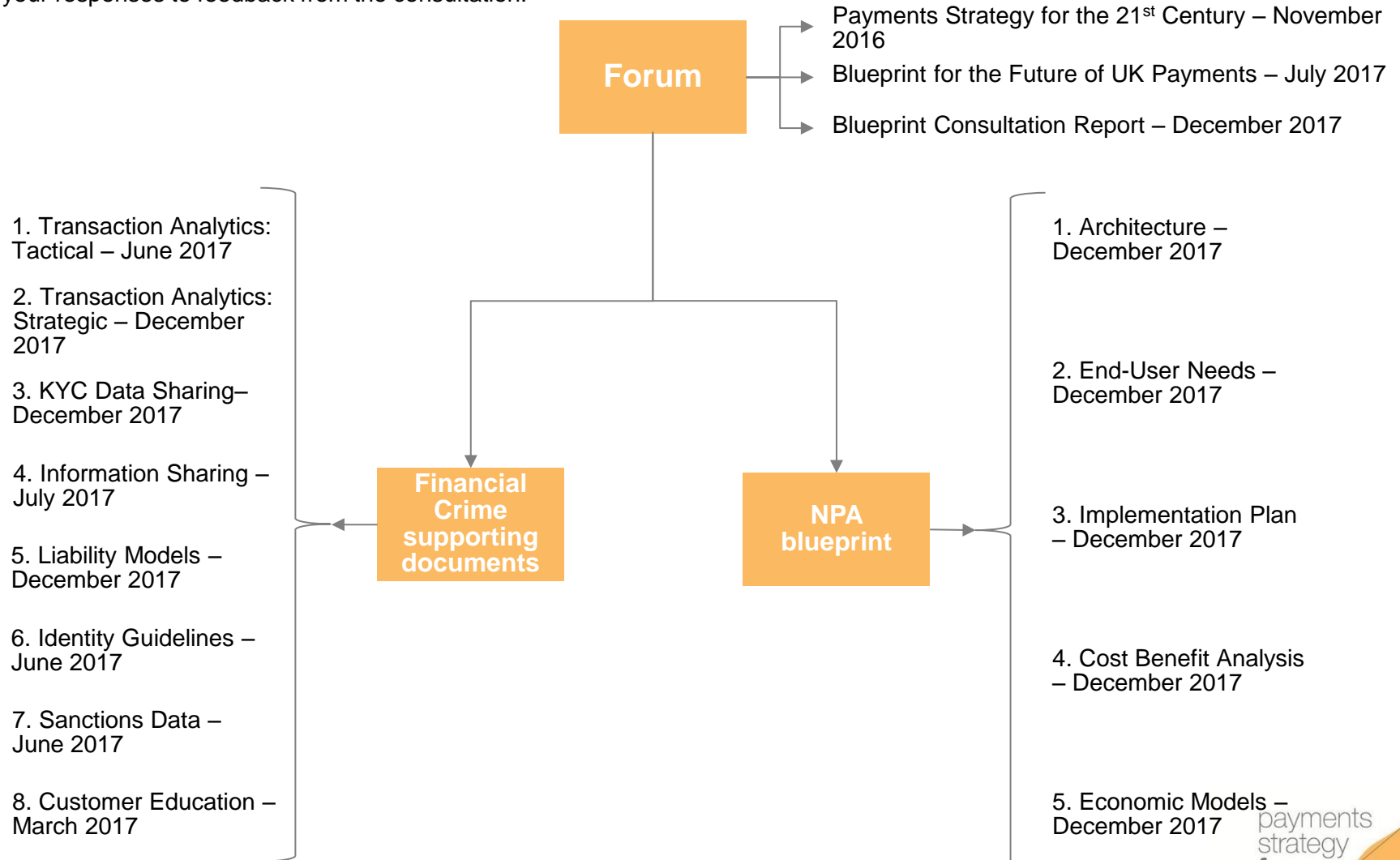


Legend

-  PSF Central Team
-  Workstreams
-  NPSO
-  Forum session
-  Milestone
-  Payments Community session

The Forum Documentation Map

The blueprint consists of a series of documents, as listed below. The supporting documents will be updated, where appropriate, to show your responses to feedback from the consultation.



NPA Blueprint

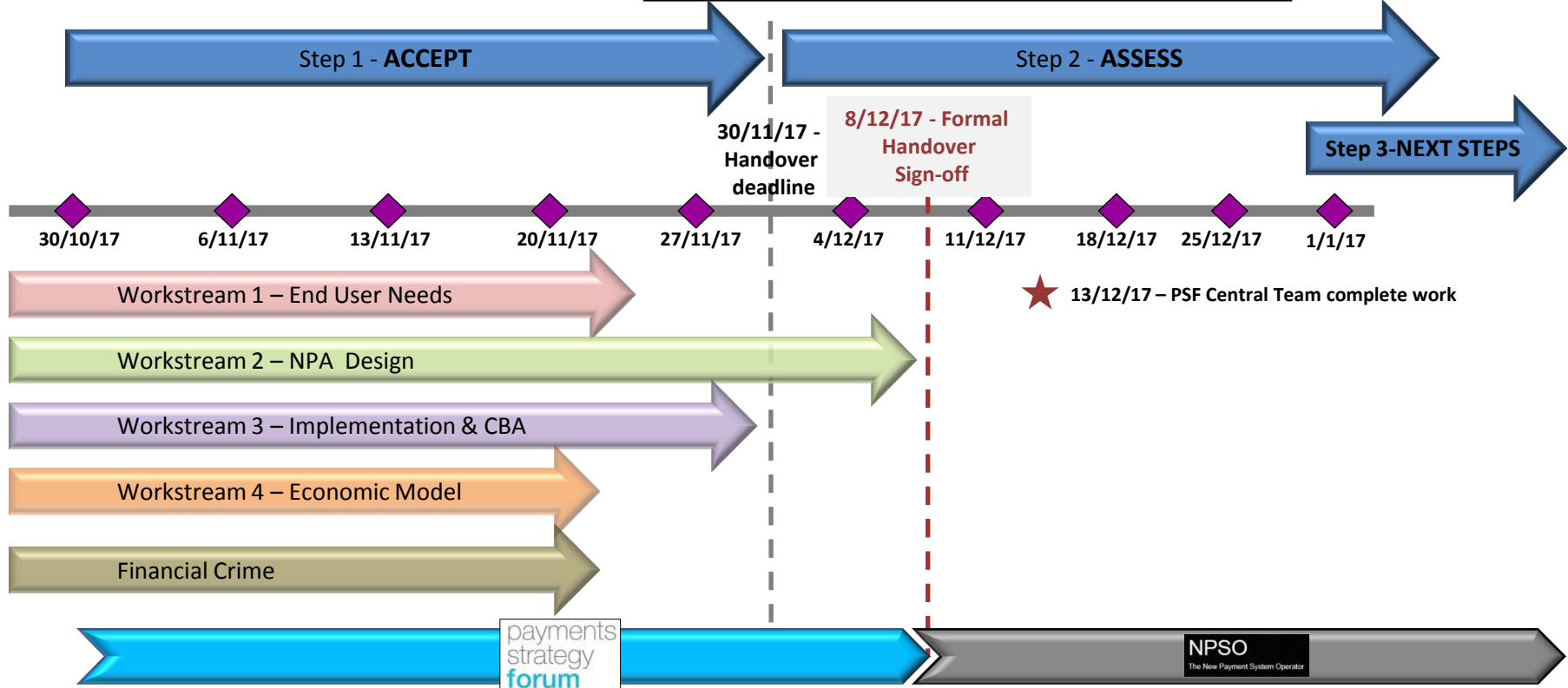
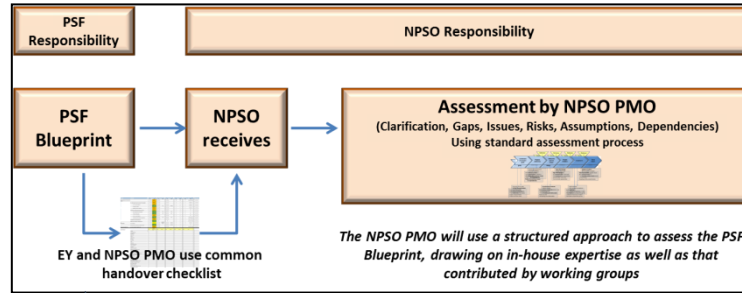
The NPA blueprint consists of the following documents. Taking into consideration feedback from the consultation, updates will be made to the supporting documents. The changes will be approved by the working groups and Design Hub, and published on the PSF website by 8th December 2017.



Document name	Date	Description
1. NPA Design and Transition	December 2017	Additional analysis undertaken and added to the blueprint To be published by 15th December 2017
2. User Requirements and Rules		Additional analysis undertaken and added to the blueprint To be published by 8th December 2017
3. NPA Implementation Plan		Updated plans and risk analysis. To be published by 8th December 2017
4. Cost Benefit Analysis of the NPA		Updates to cost benefit model To be published by 8th December 2017
5. NPA Commercial Approach and Economic Models		Small changes to the approach and models. To be published by 8th December 2017

Handover progress – overview of proposed approach

The approach to handover is to use a common checklist between the PSF and the NPSO to ensure that all documentation is passed across. In addition a series of knowledge transfer sessions are being organised.



Overall approach is to ensure clarity between:

- Handover from PSF to NPSO – which is the ‘Acceptance’ phase
- Ongoing development by the NPSO of the PSF’s Blueprint – which is ‘Assessment’ phase
- Regular weekly meetings taking place between Forum representatives and NPSO to track prog

Acceptance phase status is:

- Overall approach agreed between Forum representatives and NPSO
 - Becky Clements (WS3 Chair) hands over on behalf of the Forum
 - Tim Yudin receives on behalf of NPSO
- Common handover checklist being agreed between PSF central team and NPSO PMO
 - Shared view of all documentation being handed over
 - Identification of baselined and supporting documents
 - Confirmation of all owners within NPSO/Schemes
 - Identification of any PSF ‘in-flight’ work that requires additional attention
 - List includes stakeholders so that NPSO can continue engagement after handover

Additional NPA design & transition update

1. Clearing & Settlement - Attended Payments

- Draft set of Level 1 NPA requirements produced.
- Draft use case model developed.

2. Clearing & Settlement – Unattended Payments

- Draft set of Level 1 NPA requirements produced.
- Draft use case model developed.

3. BoE Accountbs

- Options paper produced
- NPA requirements for BoE RTGS system produced

4. Settlement Cycles

- NPA Settlement Cycles option paper produced

5. Direct Debit Collections (inc. mandates)

- Unattended payments requirements and potential solution for Bacs products over the NPA produced and socialised

6. Interface and Spec Plan

- NPA interface diagram and catalogue draft produced
- High level interface requirements draft produced

7. Consent & Auth Store

- Updated definition produced

8. JSON & XML

- Approach and options paper produced.

Additional EUN needs update

1. Certainty of Payment

- Published white paper on Certainty of Payment and how it interacts with RtP.
- Focus especially on issues raised by various corporates.

2. RtP liability framework

- Held workshop (02/11) with payments community to define RtP's liability framework.
- 26 entities represented.

3. RtP API standard

- Published v.1 of the API specification to facilitate market interoperability.
- Engaged OBIE to ensure harmonisation and leveraging of common assets.

4. CoP format and architecture

- Published standard CoP response format, factoring consultation responses.
- Published an API based architecture that allows competition in the market.

5. Enhanced Data and BoE ISO 20022 working group

- Initiated engagement with BoE working group on ISO 20022 and definition of the standard payment data form.

6. Go-to Market / Branding Framework

- Published EUN go-to market framework, branding framework and critical success factors.

7. Privacy Impact assessment

- Draft privacy impact assessment on Request to Pay and Confirmation of Payee.
- Engagement with ICO.

8. Implementation planning

- In conjunction with PSO representatives, published indicative plans for implementation of Request to Pay and Confirmation of Payee.

Additional NPA implementation planning update

1. Risk Register

- Further analysed the risks identified by both the Forum and the PSR.
- Initiated a series of reviews by resources not directly engaged in the project.
- Detailed status to be laid out later in this Forum meeting.

2. NPA Strawman Plan

- Updated the consultation strawman plan in line with emerging dates from the NPSO.
- Engaged with the NPSO NPA Programme Office to agree a joint plan view.

3. Handover

- Commenced Handover Process, 390 documents already handed over to shared NPSO/Forum repository.
- NPSO has initiated a project to receive the NPA deliverables (Agreed FCWG Strategic Transaction and Data Analytics is also included in this process).
- Started handover sessions and currently finalising NPSO owners for each deliverable and process detail.



Ai.4 Risk assessment

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A comprehensive assessment of the risks has been undertaken

Joint risk workshop with Payments UK (now UK Finance), PSOs & PSP Risk experts

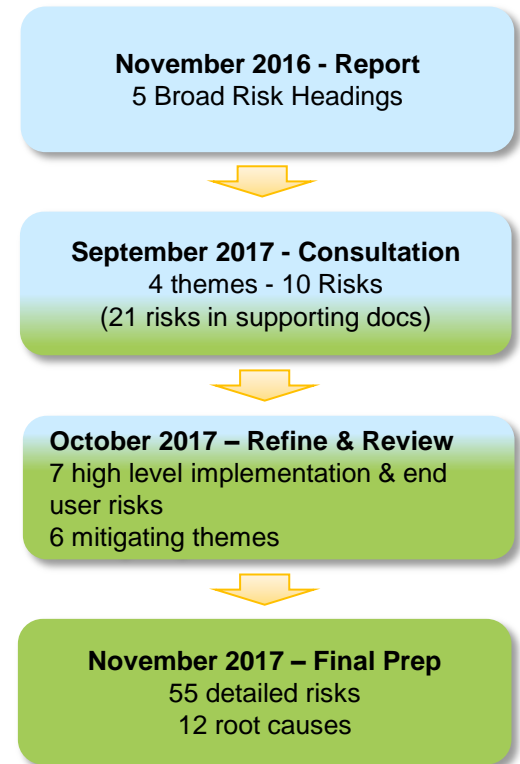
- Examined original Nov 2016 risk findings
- Determined and refined the summary risks
- Included in the Consultation and expanded in supporting document

Socialisation with NPSO, including existing PSO teams and PSR to;

- Ensuring wide socialisation, alignment and avoid duplication
- Include multiple perspectives and expanded with detailed analysis

Detailed 'point in time' risk register developed

- Ability to group into summary risk and mitigation themes for ease of consumption
- Underpinned by 55 detailed causal factors to support independent scrutiny and validation
- High level alignment to CPMI-IOSCO Principles
- Stakeholder validated/endorsed;
 - PSOs – commented and updated
 - NPSO Risk Chair – approach endorsed
 - PSF design hub – activity endorsed
 - Workstream advisory group – commented and updated
- Consultation feedback– Risk log refined
 - Independently reviewed and mitigations being explored
- Risks tested with independent industry risk expertise;
 - Root Cause analysis undertaken and socialised with key stakeholders (as above)
- Further independent review of outputs for the Design Hub (EY) – to commence
- Pre-handover mitigations being explored



The risk journey on a page

Nov 2016 PSF report

Stakeholder engagement & socialisation with PSPs, PSOs and representative groups

10 top level risks in Consultation and 21 in supporting document

Detailed risk log - 55 causes. Updated with Consultation responses and PSO feedback

High level alignment to CPMI-IOSCO Principles & review with PSR

Risk Type	Description of Risk	Mitigation
Customer issues	Possible risks related to customer experience or significant impact on the security of the customer's personal data	Placing customer considerations at the heart of the development of solutions and involving end users in development
Industry adoption	Possible risks that increase industry resistance to or reduce uptake of the proposed solution (e.g. business case for the use of a solution may not be clear)	Consulting with all industry participants in the development of the Solutions
Delivery constraints	Possible risks that industry players may face in terms of capital restrictions, human resource availability and physical assets to deploy the solution	Reassessing risks industry initiatives and seeking out workarounds
Technology complexity	Technology related risks concerning implementation of the proposed solution in a business environment, user independence risks, degree of complexity	Using best practice technology implementation
Stability	Risks for the implementation which could have an effect on the stability of financial systems (e.g. already implemented, under development and financing related)	Considering a full technical solution transition to implement solutions, ensuring approval with regulatory bodies, and BSA, FCA, PSF, etc.

Initial Risk Register - Consultation document

Risk Type	Description	Mitigation
Customer	... (text)	... (text)
Industry	... (text)	... (text)
Delivery	... (text)	... (text)
Technology	... (text)	... (text)
Stability	... (text)	... (text)

Detailed risk log - 55 causes

Category	Item	Severity	Impact	Probability
Customer	...	High	...	Medium
Industry	...	Medium	...	Low
Delivery	...	Low	...	Medium
Technology	...	Medium	...	High
Stability	...	High	...	Medium

Executive Summary

... (text)

September 2017

November 2017

H2 2016 H1 2017

H1 2018

Aligned with PSO delivery group risks

Joint PUK and PSF activity to develop and refine 4 key themes

Aligned to PSR headline risks

Independent risk expert review with root cause analysis undertaken

Handover to NPSO

NPSO Influence

The May 2017 PSO Delivery Group reports sets out a strong alignment and association with the PSF outcomes and the NPSA:

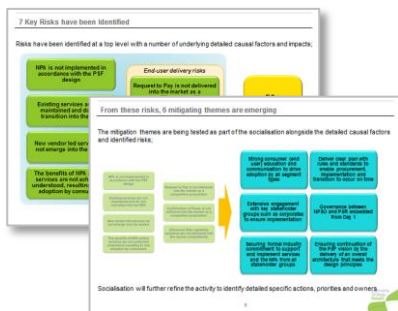
- NPSO creates a governance platform that is aligned to the development of a single NPSA
- Resourcing and change capacity are called out as key NPSO risks which are aligned to the PSF risk assessment

4 Key Risks and Mitigation Strategies

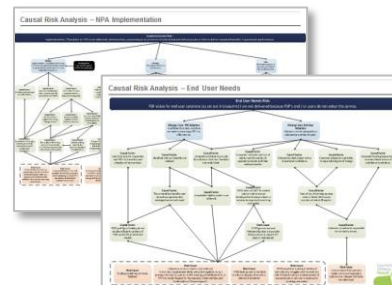
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7 implementation & end user risks with 6 mitigating themes



12 overall root causes. Approach reviewed by NPSO Risk



Risk Plan Executive Summary (1)

Situation

- The Payment Strategy Forum WS3 has engaged with industry risk specialists to conduct a 'point in time' risk analysis of the New Payments Architecture (NPA) and End User Needs implementation
- The key focus has been to maintain the 'purity of vision' through the transition to the NPSO, ensuring risks to the NPA implementation are considered as early as possible with mitigations identified and in place
- The analysis has conducted on the existing project risk register and a number of workshops with WS3 representatives. Risks identified within the consultation responses have also been considered and included
- A causal risk analysis methodology has been used to identify the linkages and contagion factors between the risks and their causes in order to identify the key root causes set out on the following slides.
- Like any transformation programme, changes introduce a level of risk. This is neither undesirable or avoidable.
- Even without the NPA / EUN being implemented the industry will have to accept a certain level of risk as systems require tendering, migration and refresh.
- The objective, therefore, will be to ensure that risks are within the risk appetite of the NPSO (as systemic risk manager of payments industry) and of other key stakeholders.

Risk Plan Executive Summary (2)

Complication: Risks and Root Causes

- Implementation Risk: Implementation / Transition to NPA is not delivered, delivered late, causes impact to provision of critical national infrastructure or fails to deliver expected benefits / operational performance.
- End User Needs Risk: PSF vision for end user solutions (as set out in blueprint) are not delivered because PSPs and / or users do not adopt the service.

Root Cause	
Technical Maturity	Existing systems have reached a level of maturity with most known defects fixed and the stability of the services improving year on year.
Corporate Memory	There will inevitably be a bedding in period for operational, technical and customer service staff.
End User PSP Adoption	Ability of end users and PSPs to adopt new solutions may be restricted due to ability to cope with level of change and the design interlocks with Open Banking and PSD2.
Funding Model and Business Case	Uncertainty remains on the funding model and whether the Business Case for PSPs stands up.
Systems are more complex than anticipated	Bacs has 40 years of evolution that needs to be redesigned into the NPA and unpicking all the design features that have been layered on to the system may be more complex than anticipated
NPA over-engineering/over-designing	Increased demands on potential suppliers could deter them and / or scope creep once procurement is complete may lead to programme failure
CI Competitive Procurement timelines	To ensure a successful NPA infrastructure procurement, alignment needs to be made between existing infrastructure contract renews, existing technology investment cycles (there is an assumption that exiting systems can run in parallel for a period of time, which in practice may not be possible without technology renewal) and regulatory pressures.
Ubiquitous service / reach is not achieved	NPSO lacks power or mandate to enforce ubiquity of service or minimum standards.
Lessons learnt	End User and media perception not managed (i.e. messaging on the future of direct debit) and / or customer concerns not responded to in a timely manner could lead to a repeat of criticism received by the payments industry in the past (i.e. Cheque End Date).
Culture	NPSO may prioritise running of existing CI and culturally struggle with transition to role of market catalyst in development of new products or services in response to evolving user needs.

Risk Plan Executive Summary (3)

Resolution – Risk Assessment and Mitigation

Risk	Root Causes	Risk Assessment (Residual / Current)	Mitigation Recommendations	Risk Assessment (Risk Appetite / Target)
Implementation Risk: Implementation / Transition to NPA is not delivered, delivered late, causes impact to provision of critical national infrastructure or fails to deliver expected benefits / operational performance	<ul style="list-style-type: none"> Corporate Memory End User PSP Adoption Funding Model and Business Case Systems are more complex than anticipated NPA over-engineering/over-designing CI Competitive Procurement timelines Ubiquitous service / reach is not achieved Lessons learnt Culture 	Likely / Major	<ul style="list-style-type: none"> ○ Risk Register to be mapped to the CPMI-IOSCO Principles to ensure all stability considerations are included as early as possible in the detailed design – High level mapping undertaken ○ NPSO to ensure it has the capabilities to support new funding and liability models introduced by NPA and can deliver role as a 'market catalyst'. ○ Minimum standards: The various solutions must meet the minimum requirements and rules as defined by the PSF and administered by the NPSO. This will ensure the detriments identified in the Strategy are addressed. The NPSO must ensure it has the capability to perform this task ○ Close engagement with NPSO team to ensure an orderly handover of all activity, continuity and purity of vision 	Rare / Major
End User Needs Risk: PSF vision for end user solutions (as set out in blueprint) are not delivered because PSPs and / or users do not adopt the service.	<ul style="list-style-type: none"> Corporate Memory End User PSP Adoption Funding Model and Business Case Ubiquitous service / reach is not achieved Lessons learnt Culture 	Likely / Major	<ul style="list-style-type: none"> ○ Fostering competition in the market: For a Payer's PSP to offer Confirmation of Payee it is imperative that the Payee's PSP responds to their request for confirmation. ○ All PSPs should respond to request for confirmation: we recommend that all ASPSPs should, as a pre-requisite to participating in push payments respond to requests for confirmation of payee ○ Coordinated engagement across industry. ○ The role of the PSR: The PSR reserves the right to mandate Confirmation of Payee should it deem it necessary to correct a market failure. 	Unlikely / Major

A key immediate activity is to ensure these recommendations are aligned to existing WS3 mitigation themes

Mitigating Activity – Current Position

Strong consumer (end user) education and communication to drive adoption by all segment types

- NPSO to develop a clear plan in 2018 to publicise and communicate service capabilities including marketing and branding.

Securing formal industry commitment to support and implement services and the NPA from all stakeholder groups

- Ongoing Workstream 1, 2 & 3 activity to socialise with PSP stakeholder groups responsible for technical and customer propositions
- Identification and clarification of further detailed work required
- Refining NPA design and developing post consultation activity alongside existing PSO work
- Work in progress activity to be allocated to specific owners within NPSO as part of the handover process.

Extensive engagement with key stakeholder groups such as corporates to ensure implementation

- Existing PSF socialisation, including the Consultation, has gained valuable insights into stakeholder thinking
- Further corporate engagement to continue into Q1 2018

Deliver clear plan with rules and standards to enable procurement, implementation and transition to occur on time

- Initial mapping to CPMI IOSCO principles undertaken
- WS1 & WS2 engagement with standards teams to define next steps underway

Governance between NPSO and PSR embedded from Day 1

- Outside immediate influence of the PSF activity
- NPSO have initiated activity to onboard the PSF outputs, which will be embedded into the new governance structures

Ensuring continuation of the PSF vision by the delivery of an overall architecture that meets the design principles

- Ongoing refinement of the NPA architecture drawing out the areas for further detailed analysis (e.g. Direct Debit), which will commence prior to handover
- A comprehensive package of work in progress is being prepared to enable NPSO to continue the work in 2018
- Integration of risk review into NPSO risk register

Key next steps for the risk plan activity

- Ensure that the workstream activity addressing the mitigations is clearly identified in the final handover both at the Working and Risk level by 30th November
- Complete external risk review activity by 17th November
- Ensure alignment and integration into NPSO handover activity by 24th November



Appendix – Risk Review

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7 key risks have been identified

Risks have been identified at a top level with a number of underlying detailed causal factors and impacts

NPA is not implemented in accordance with the PSF design

Existing services are not maintained and do not transition into the NPA

New vendor led services do not emerge into the market

The benefits of NPA and/or services are not achieved/understood, resulting in non adoption by consumers

End-user delivery risks

Request to Pay is not delivered into the market as a competitive proposition

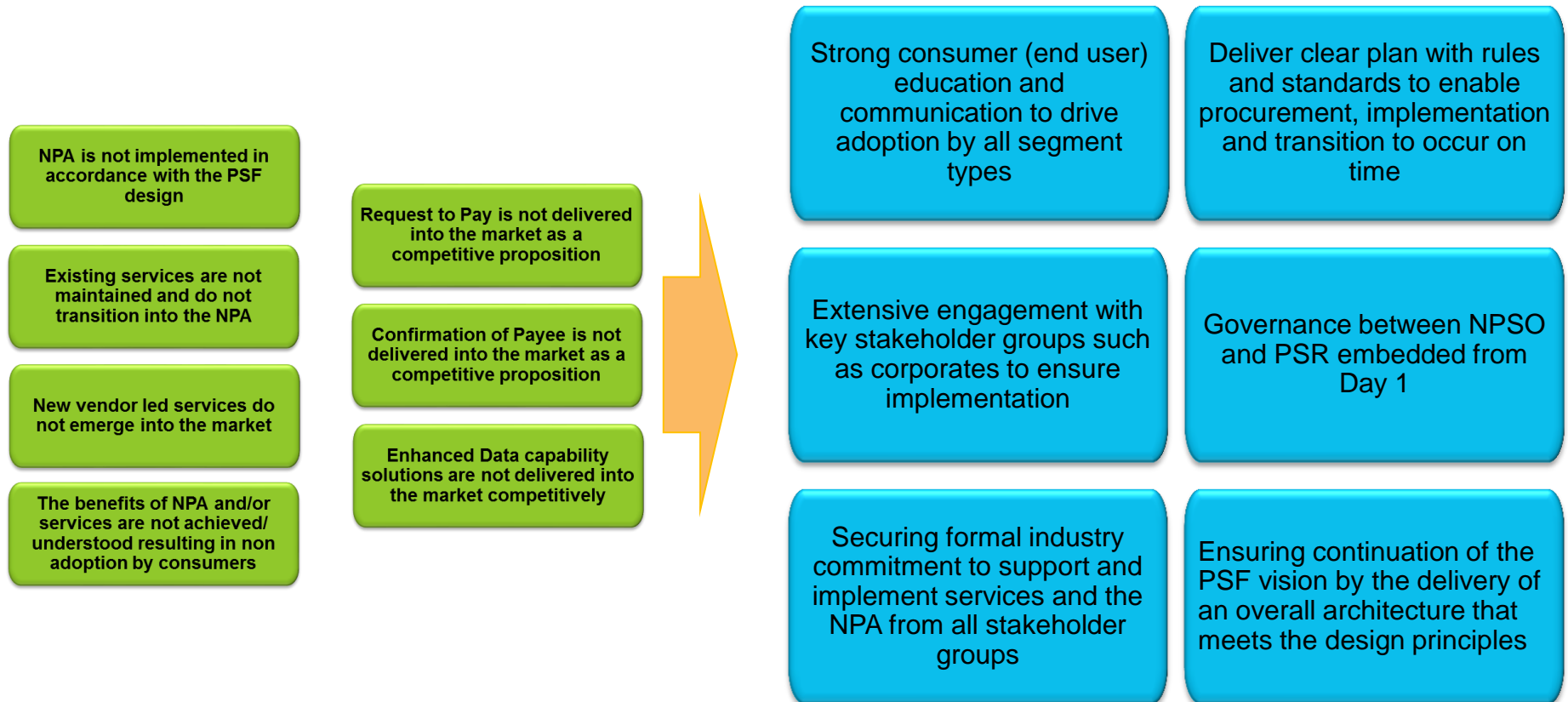
Confirmation of Payee is not delivered into the market as a competitive proposition

Enhanced Data capability solutions are not delivered into the market competitively

50+ Detailed causal factors and impacts underpin and expand on the key risks, enabling specific mitigating actions to be defined

From these risks, 6 mitigating themes are emerging

The mitigation themes have been tested as part of the socialisation alongside the detailed causal factors and identified risks.



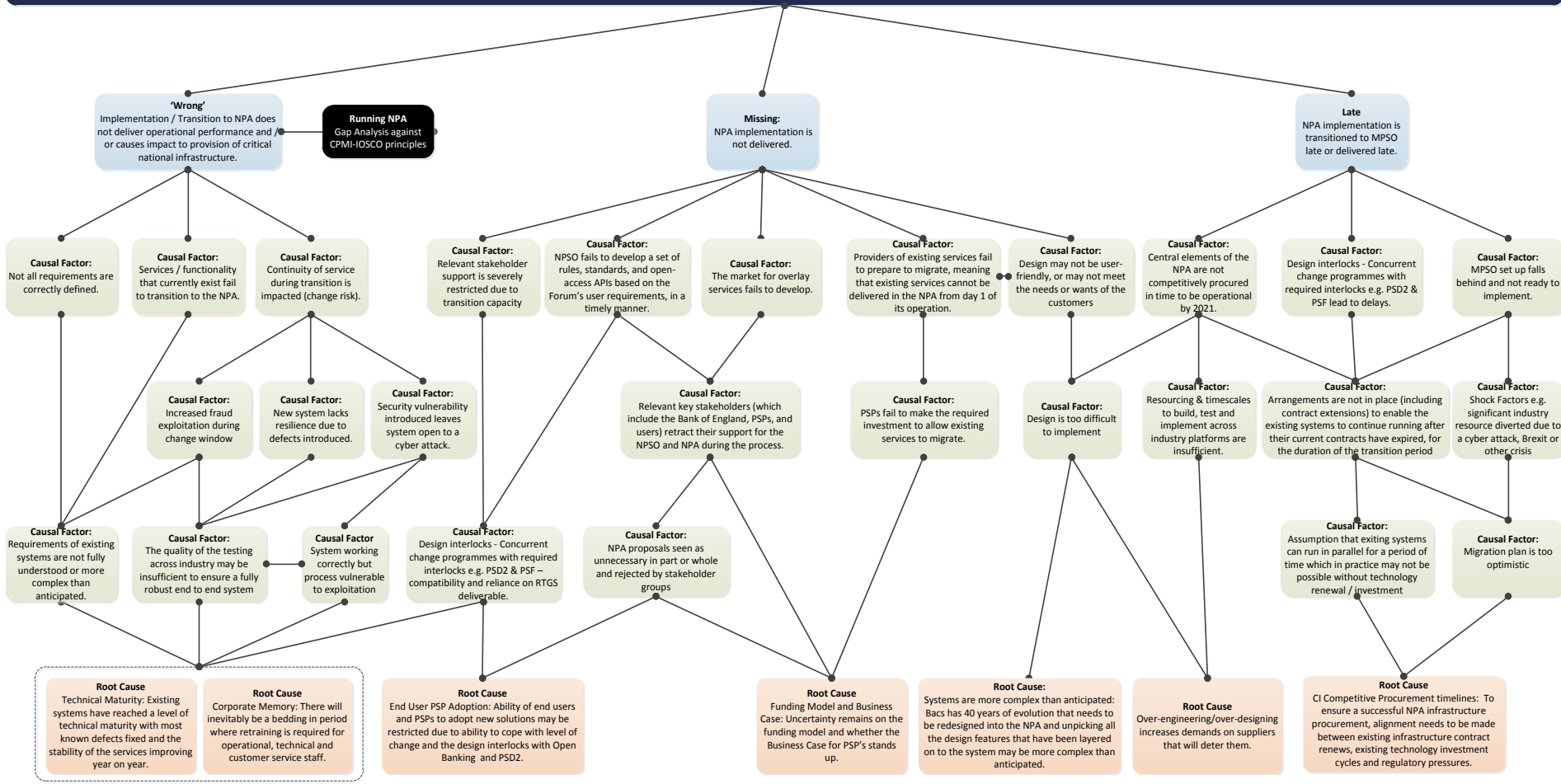
Socialisation will further refine the activity to identify detailed specific actions, priorities and owners.

Initial risk register in the consultation document

Risk Type	Description	Mitigation
Design	<ul style="list-style-type: none"> • The high level design is conceptual with unproven elements • The bulk payments solution is radical and unproven • High dependency on concurrent change programmes e.g. PSD2/Open Banking • Over-engineering may deter suppliers • Design may not fully meet customer needs 	<ul style="list-style-type: none"> • Extensive stakeholder engagement to validate and assess the detailed definitions prior to tendering • Ongoing design socialisation and transition planning • Ensure the NPSO has the right delivery capability and approach • Ensure detailed design definition is not over-engineered • Regular customer and end-user research
Implement	<ul style="list-style-type: none"> • Lack of transition capacity to implement including new ISO standards • Dependency on market (FinTechs/Suppliers) to provide end-user needs solutions • Timescales to build, test and implement not validated • Quality of industry testing may be insufficient • Industry and customer ability to adapt to change 	<ul style="list-style-type: none"> • Deliver an industry agreed implementation plan • Early and wide engagement and socialisation. In depth diligence checks and competitive tendering processes • In depth transition plan assessment and agreement • Best practice implementation with unambiguous criteria • Develop detailed understanding of all end-user needs and incorporate into overall programme
Operate	<ul style="list-style-type: none"> • NPA does not deliver expected benefits or operational performance • Service is interrupted during transition • No embedded knowledge of new system elements • Resilience/vulnerabilities are exposed • Unforeseen or additional run costs 	<ul style="list-style-type: none"> • Establish clear performance/benefits criteria at the initial definition phase • Agree phasing of migration and parallel running as identified • Extensive consultation and knowledge transfer to all stakeholder groups • Resilience and security to be at the core of programme • NPSO business case includes all stakeholder impacts
Adopt	<ul style="list-style-type: none"> • End-user education is insufficient for degree of change • Increased fraud exposure during transition • Pace of change is impacted by end user/PSP capabilities • Solution is not sufficiently scalable • NPA proposals are rejected, in part or whole, by stakeholder groups • Insufficient priority delays transition and adoption 	<ul style="list-style-type: none"> • Develop consistent cross industry comms plans • Engagement with financial crime prevention representatives across industry • Best practice implementation techniques for large scale projects • Designed in scalability with robust monitoring • Compelling comms and socialisation plans developed • Clearly signposted migration milestones and end dates

Causal risk analysis – NPA Implementation

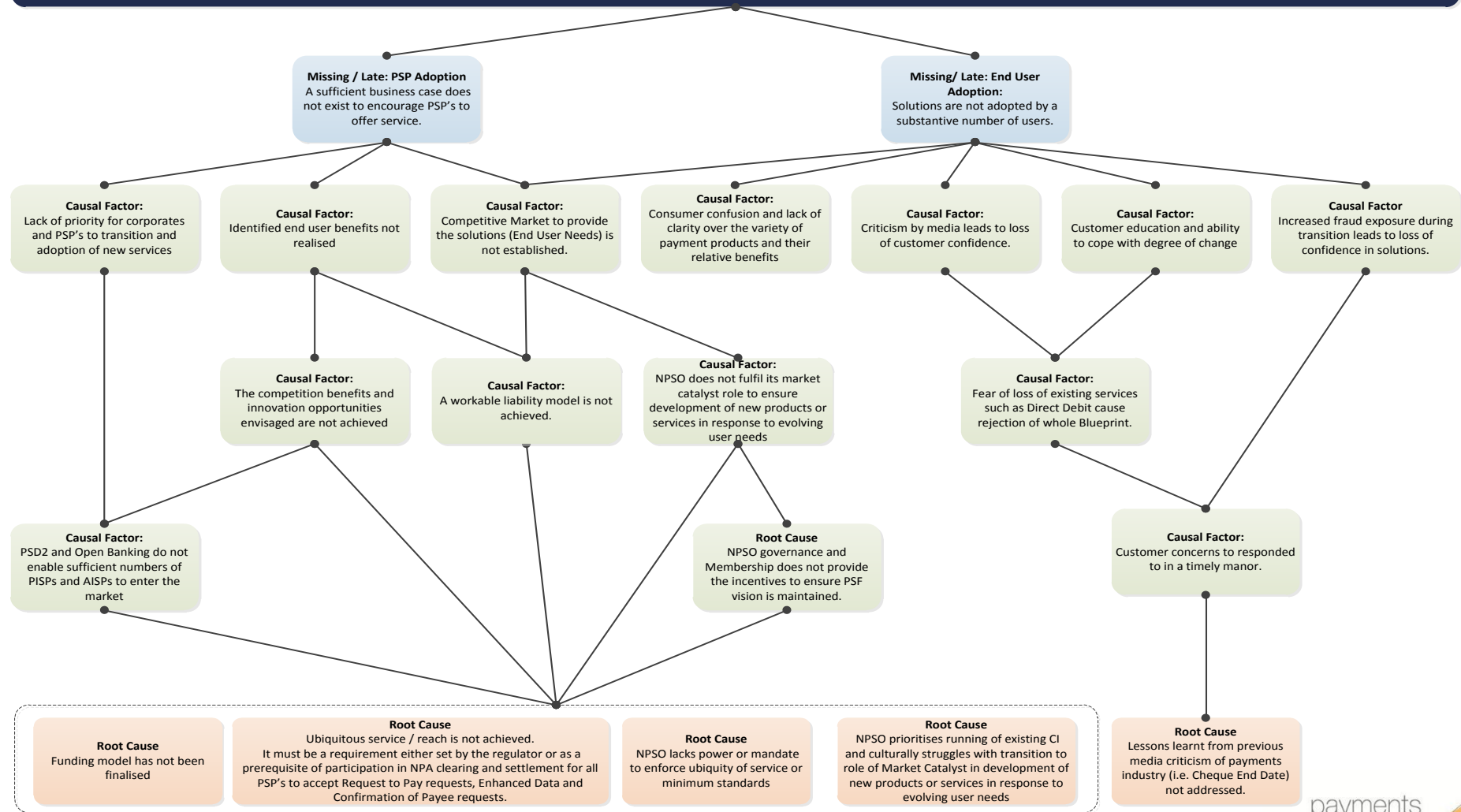
Implementation Risk:
Implementation / Transition to NPA is not delivered, delivered late, causes impact to provision of critical national infrastructure or fails to deliver expected benefits / operational performance.



Causal risk analysis – End User Needs

End User Needs Risk:

PSF vision for end user solutions (as set out in blueprint) I are not delivered because PSP's and / or users do not adopt the service.





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