FINANCIAL CONDUCT AUTHORITY PAYMENT SYSTEMS REGULATOR

## **Faster Payments** Presenter: Jana Mackintosh, PSR Facilitator: Sulabh Agarwal, Accenture Note Taker: Jaskaran Sangha, Accenture

## Concerns identified by stakeholders

#### Direct access

High infrastructure costs to meet scheme technical requirements VocaLink relationship with FPS and PayM together with bank ownership of VocaLink creates conflicts of interest and may create barriers to access for new payment services providers

### **Indirect access**

Limited number of sponsoring banks providing access

Not all sponsors will engage with non-banks

Queries regarding the large difference between direct and indirect participants' access costs

Difficult for providers with small volumes to find a cost-effective access solution

Lack of 24/7/365 real-time connectivity option for indirect participants. In terms of product proposition, differences in connectivity levels are exacerbated further by developments such as PayM.

## On-going and potential developments

#### **On-going developments**

FPS implementing cash prefunding by end 2014

#### Other potential changes raised by stakeholders

Potential for requirements and costs for smaller direct members to be reduced through the adoption of a more risk-based approach

Some proposals for 'infrastructure lite' options

Some support for access solutions to be designed into infrastructure provision through a central hub (including potentially across schemes).

Other potential aggregation options have also been raised as a potential way of reducing the costs of smaller direct participants



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## Other interbank systems (Bacs,CHAPS, C&CCC, LINK) Presenter: Tim Keyworth, PSR Facilitator: Sulabh Agarwal, Accenture Note Taker: Auraelena Guia, Accenture

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## Bacs

### **Concerns identified by stakeholders**

Direct debit guarantee (unlimited in time and amount) creates increased risks to sponsoring banks when providing indirect access Limited portability of sort codes increases switching costs Complexity and information availability regarding access options

# On-going and potential developments identified by stakeholders

Implementing cash prefunding by end 2014 to remove the operational complexities, residual credit and liquidity risks and requirement for shared losses in the current collateral based settlement liquidity and loss sharing arrangements.

Issue of sort code portability with respect to Bacs largely addressed by most sponsoring banks

## CHAPS

## **Concerns identified by stakeholders**

Complexity and cost of requirements for direct membership

# On-going and potential developments identified by stakeholders

Some stakeholders pointed to the potential for a more risk-based approach to CHAPS requirements to reduce cost and complexity

CHAPS Board has endorsed a revised risk-based participation model that will result in 3 categories: anticipated that any challenger institutions would be in Category 3, given their volume/value mix

Anticipated that – following a review - Category 3 participants will need to adhere to only a subset of CHAPS' requirements, reducing internal participation costs

CHAPS reviewing its funding model arrangements.

CHAPS will be launching its Affiliates Group in July 2014





### **Concerns identified by stakeholders**

Switching agency provider very difficult: lack of portability of sort codes Inability of agency participants to influence the level of costs in the system Perceived higher cost of participation for indirect participants than direct members

Initial joining charge raised as a significant issue as it takes account of the cost other members expect to incur from admitting the member Potential conflicts of interest caused by sponsor bank ownership of processing

Potential conflicts of interest caused by sponsor bank ownership of processing companies

# On-going and potential developments identified by stakeholders

Increased information and engagement from C&CCC Initial joining charges: Review of current member costs for new member joining Annual charges: Review of minimum 2% charge for company call Publication of information on membership costs under consideration Development of a future clearing model with cheque imaging

# LINK

### **Concerns identified by stakeholders**

Basic Bank Account customers do not have access to LINK ATM network: distorted the economics of LINK

- Concern that current interchange fees and structure provides excessive profit to members with large ATM networks
- Perceived lack of investment in infrastructure (e.g. banks not upgrading ATM software)

View that VocaLink relationship with LINK together with bank ownership of VocaLink creates conflicts of interest and may lead to barriers to access for new payment services providers

### Potential developments identified by stakeholders

Formal separation between the LINK scheme and VocaLink to increase independence and limit conflicts of interest

