

**HM Treasury roundtable on the adoption of a 'risk-based approach' to payments**

- 1. To what extent do stakeholders have sympathy with the policy position outlined in relation to receiving PSPs?**
- 2. Do you agree or disagree with the proposal to extend the time period following receipt of funds after which the PSP must credit said funds to the payee account? Why?**
- 3. How does this proposal interact with POCA?**
  - a. To what extent can receiving PSPs effectively utilise POCA where they suspect fraud under the existing regime?
  - b. Is there any particular reason that POCA should avoid interacting with received funds that have not yet been credited to a customer's account?
- 4. What impacts would a policy change to further enable receiving PSPs to delay payments prior to payee crediting have?**
  - a. Is there any perceived risk to consumers? For instance, do you believe PSPs should have an obligation to compensate consumers for losses caused by false positives?
  - b. Is there an impact on the smoothness of payment flows to the real economy, or on confidence in the financial system?
- 5. Do you believe that the request for this change is a symptom of broader POCA inflexibilities, or is it a particular issue that resides with the Payment Services Regulations 2017?**

Submit your comments to [diane.brocklebank@paymentsinnovationforum.org](mailto:diane.brocklebank@paymentsinnovationforum.org) by 6 February 2023