The Reimbursement Claims Management System (RCMS): Product Outline

Pay.UK APP fraud reimbursement

July 2025

The fight against fraud

Operating at the centre of the UK payments ecosystem, we have the unique ability to act to combat fraud with significant impact.

With access to the technology, rules and standards to realise this vision in our capacity as a payment systems operator, we are working to provide pioneering products and services to detect and prevent fraud.

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“With high levels of payment fraud, we must continuously work to identify and address vulnerabilities through robust anti-fraud measures.

Tackling this growing criminal threat is a top priority for Pay.UK and our customers

In 2024, criminals stole **£1.17 billion** through **unauthorised and authorised fraud**

Authorised Push Payment (APP) fraud losses accounted for **£450.7 million** (down 2% from 2023)

The total **volume of cases fell by 20% to 185,733** from the previous year

70% of APP fraud **started online** and **16% started through telecommunications** networks

*stats from UK Finance 2024 full year report

APP Fraud
Reimbursement policy

An introduction to the Authorised Push Payment Reimbursement (APPR) policy

INSTRUCTION

The Payment Systems Regulator instructed Pay.UK to implement the new policy via Specific Direction SD19. The obligations on around 900 PSPs were outlined separately in Specific Direction 20 for FPS.

REIMBURSEMENT

The Sending PSP has five business days to reimburse a consumer from the point of the claim being raised.

MAX CAP

The maximum reimbursement amount is £85,000 per claim.

CONTRIBUTION

Receiving PSPs have five business days to pay their share of the reimbursable contribution amount.

STATUTORY

Statutory obligation on the PSR to introduce a reimbursement requirement for APP scams payments over FPS.

FPS FRAUD

Mandatory reimbursement for all types of APP fraud claims where the payments have been made using FPS

EXCESS

The Sending PSP may apply an excess of up to £100 per claim, except in circumstances where the consumer is assessed as being vulnerable.

50/50 SPLIT

There is a shared liability of 50:50 between Sending and Receiving PSPs, known as the reimbursable contribution amount.

Pay.UK delivery requirements of APPR

We added APP reimbursement requirements, as set out by the PSR, into the FPS Rules (SR1).

Enable monthly collection of data from in-scope PSPs to enable the monitoring of compliance with the reimbursement rules.

Act appropriately on breaches of the reimbursement rules by all in-scope PSPs in line with applicable consequence management procedures.

Monthly reporting of data back to the PSR to allow it, as the public authority, to enforce non-compliance for in-scope PSPs.

Delivered an APPR solution, inclusive of a claims management tool, to support PSPs to meet their APPR obligations.

Delivery

Pay.UK implemented the APP Reimbursement policy, as directed by the PSR. We further committed ourselves to developing a single system for claims management and delivering this before the policy go-live deadline 7 October 2024.

Single system solution

We developed our single, whole-of-market solution to help PSPs manage and streamline the reimbursement process. It comprises a directory to search for in scope PSPs, enables PSP mandatory data reporting, and provides claims management workflows.

Training material

Documented processes and training material are stored within the Datasite Repository. There are E2E journeys for all steps within the Directory and Claim management process steps.

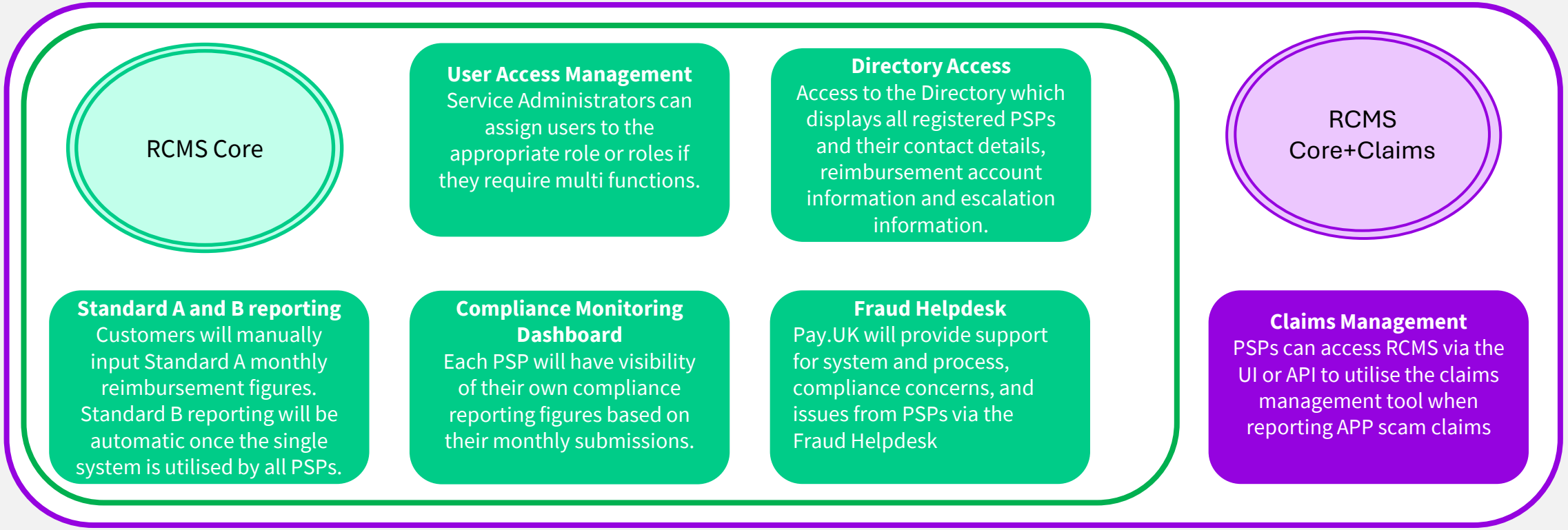
Regular engagement

Regular industry calls to engage with PSPs and PSR on all things APPR related. Current and future requirements, spotlight sessions and RCMS update awareness sessions are presented, and outputs are shared with participating attendees.

Reimbursement Claims Management System (RCMS) options

RCMS solution options

- RCMS Core - Standard APP Fraud Reimbursement capability (PSP directory, and data reporting capability)
- RCMS Core+Claims - Advanced solution offering Core capability plus APP claims management workflows



Reimbursement Claims Management System (RCMS) product features

RCMS Core

Directory

- In-scope PSP contact details
- In / out-of-scope marker
- Reimbursement contribution account details for sending PSPs
- Ability for PSPs to claim sort codes
- Ability to group subsidiary PSP entities
- PSP escalation contact details

Compliance Data Reporting

- Standard A data reporting
- 20 mandatory data points collected
- Compliance monitoring dashboards
- Approaching non-compliance reminders
- User dashboard
- Notifications when tasks are pending

RCMS Core +Claims

Claims Management

- End-to-end APPR claims management workflows
- Integrated search PSP scope status using sort code and account number
- Ability connect via a user interface or API integration
- Automated calculators for reimbursement contribution
- Automated calculators for repatriation of recovered fraud funds
- User dashboard to support effective claims management
- In system and email notifications
- Ability for free text communication between claim parties
- Stop-the-clock capability
- Complex case marker
- Ability to download reports
- *Automated generation of Standard B reporting when implemented by regulator*