



To: Ruth Evans
PSR

From: Katy Worobec

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Dear Ruth

Actions from the PS Forum 29 September

At the meeting, I picked up an action to respond on three points:

- concerns on fraud communications regarding information handling by PSPs in light of PSD2 and Open Banking;
- concerns re information sharing and identity guidelines; and
- how UK Finance plans to measure the effectiveness of the Take 5 education and awareness campaign.

Communications around PSD2 and Open Banking

We have an internal working group with UK Finance coordinating the following:

- Development of a PSD2 customer factsheet. The FCA have developed their own high level version and we will incorporate this to ensure consistency in language and content;
- We have developed new and amended text for Take 5 to reflect the changes PSD2 will introduce i.e. the introduction of TPP services and the need, in some cases, for customers to divulge their banking credentials to able to use these services;
- Keeping abreast of the Open Banking customer communications and coordinating this with the PSD2 communications we are putting together;
- A meeting to be arranged with the TPP community via FDATA (who represent a number of UK TPPs) to make them aware of the communications we are producing and determine if they can promote the same messages and avoid any potential conflict.

Concerns around Information Sharing and Identity Guidelines

In addition to the points made by Russell Saunders in the meeting: (that the idiosyncrasies between firms were the reason for the guidelines being quite high-level, and that any guidelines would be a baseline over which competitive activities could take place), it's worth noting that, while not including all fin techs or EMA constituents, UK Finance is the broadest and most complete representative body in the financial sector, and as such includes a very wide range of members of varying sizes, types and business models. This variety makes us representative of the wider industry in many ways and any given solution will need to take these diverse models and interests into account. On top of that, any solution developed and delivered by UKF will be based on an inclusive, broadly representative process, with plenty of time built in to develop, review, amend and disseminate the outputs throughout 2018. We would welcome EMA's direct involvement and engagement, and that of their members.

The working group deliberately and very directly took the decision to move away from a solution centred around the generation of standards, or to go above and beyond the obligations and best practice already being observed by the industry, including EMA members. The guidelines will be just that – a guide to enable firms, particularly smaller firms, new entrants and fin techs, to be better able to understand, navigate and meet the requirements of existing rules and practices. If the firms are meeting their current obligations, there is no reason to assume they would not be in line with the guidelines. Also, it has been specifically stated that the guidelines will not in any way exceed existing rules and best practice – so there is again no danger that new more stringent rules will be introduced by the back door. The project is there to help organisations to interpret and implement their existing obligations, not to set new ones. EMA members are those most likely to benefit from this approach.

Its worth noting that in accepting the Identity Guidelines proposal, UK Finance has undertaken due diligence and further scoped the proposal. However, the original acceptance was planned for June/July earlier this year, which in the event was not possible until September. Given the delayed start of the project, UK Finance will deliver against the second and third stage project gateways (to review and amend by end H1 20178, and publish by end of 2018), however the first draft text is now expected to be available not before mid Q1 2018. The other timings will remain unaffected by this initial delay.

Measuring the Effectiveness of Take 5

Please see attached which outlines the overview of the research approach for phase 2 of Take 5.

I hope this answers the points raised in the meeting but if there are any further questions please let me know.

Kind regards,

[Katy Worobec](#)
Head of Economic Crime
UK Finance

Take Five Campaign KPIs

The performance of the Take Five campaign will be measured using the framework used by the Home Office to evaluate the success of HMG behaviour change campaigns.

Three key campaign areas will be measured: Outputs, Outtakes and Outcomes. The components of each area in relation to Take Five Phase 2 are listed below.



Outputs will be continuously optimised throughout the campaign with key activities being adjusted to maximise performance e.g. paid-for activity includes digital advertising. If the target number of impressions is not being achieved in a particular area, the spend will be redirected to better performing areas.

| Outputs | | | |
|------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Paid-for</i> | <i>PR</i> | <i>Social Media</i> | <i>Members</i> |
| VOD <ul style="list-style-type: none"> Impressions Clicks | Earned media <ul style="list-style-type: none"> Coverage Sentiment Message delivery | Social media <ul style="list-style-type: none"> Impressions Reach Av frequency Video views Link clicks | Reach <ul style="list-style-type: none"> Reach |
| Digital <ul style="list-style-type: none"> Impressions Viewability (GTD) Impactful formats | Events/Mumsnet <ul style="list-style-type: none"> Reach Impressions Influencer attendees | | Partnerships <ul style="list-style-type: none"> Recruits Quality recruits Over 65s Quality recruits: |
| Time Inc <ul style="list-style-type: none"> Reach Rich media Digital content | | | Website <ul style="list-style-type: none"> Members Resource downloads (Customers) Visits |
| Radio – Global <ul style="list-style-type: none"> Reach Frequency | | | |

Outputs will be measured jointly by Carat (media buying agency), Kindred (creative agency) and UK Finance monitoring Member activity.

Outtakes and Outcomes will be measured using qualitative and quantitative market research undertaken by research agency; Britain Thinks.

The approach will be to undertake surveys and focus groups to measure awareness i.e. awareness of fraud generally and campaign specific awareness.

Benchmarking research was undertaken in September ahead of the start of Phase 2 activity. The first peak burst of paid-for advertising ran in October and the second peak will be in

November. A second dip of research is planned for November timed to measure the effectiveness of the first two peaks of activity.

The final research dip will be undertaken post campaign timed to capture the results of Take Five Week and the final peak of campaign activity.



Overview of approach

