{{Logo}}

{{Company Name}}

CASS Resolution Pack Master Document Template

CASS 15 – Payment Firms

{{Date}}

Contents page

1.0 CASS Resolution Pack Overview

Purpose

The purpose of the CASS Resolution Pack is to ensure that [Firm Name] maintains and is able to retrieve information that would, in the event of its insolvency, assist an insolvency practitioner in achieving a timely return of relevant funds held by the firm to that firm's clients.

Applicability

[Firm Name] ("[Firm Short Name]") as a [describe firm type e.g. authorised payment institution / e-money institution / small payment institution] (see Section 2 for a more detailed overview of its activities) and in line with its FCA regulatory permissions is subject to the following CASS Rules:

- CASS 15 (Safeguarding of relevant funds for payment institutions and e-money institutions)
- [List any additional applicable CASS rules]

A full list of [Firm Short Name]'s FCA permissions can be found via the FCA Register: https://register.fca.org.uk/s/

[Firm Short Name]'s CASS Rules Risk Assessment Matrix can be obtained from: [file path or document management link]

Review and Attestation

This CASS Resolution Pack, including this master document and all accompanying documentation, is reviewed and attested to on a [weekly / monthly / quarterly] basis by [Role e.g. Head of UK Regulation / Compliance Manager]. Any material changes to the firm's business, structure, or regulatory permissions must trigger an out-of-cycle review.

2.0 Firm Overview

Background

[Firm Name] (“[Firm Short Name]”) is a [describe firm type e.g. authorised payment institution / e-money institution / small payment institution] registered in the United Kingdom with Companies House number [number] and authorised and regulated by the Financial Conduct Authority under FRN [number]. The firm’s registered address is [address].

[Firm Short Name]’s client base includes [describe client profile e.g. retail clients / corporate clients / merchants]. The firm provides payment services to clients seeking [describe services e.g. account information services / payment initiation services / money remittance / e-money issuance].

Regulated Activities and Permissions

[Firm Short Name]’s principal regulated activity is the provision of [describe services e.g. payment services / e-money issuance] in accordance with its FCA permissions under the Payment Services Regulations 2017 and/or the Electronic Money Regulations 2011.

The firm is subject to CASS 15 obligations in its capacity as:

- [e.g. an authorised payment institution providing payment services under Schedule 1 of the PSRs 2017]
- [e.g. an authorised electronic money institution issuing e-money under the EMRs 2011]

Note: List each capacity that triggers CASS 15 obligations with the relevant regulatory reference. Remove any that do not apply.

Products and Services

Note: Describe the firm’s core products and services relevant to relevant funds. Include: the payment service types provided (as listed in Schedule 1 of the PSRs 2017), and any e-money issuance under the EMRs 2011; client types served; how relevant funds are received and held prior to execution; and any outsourced operational functions. Reference applicable PSR / EMR rules and CASS 15 where relevant.

Operating Model

Note: Describe how the firm operationally delivers its payment services. Include whether the firm acts as a direct payment institution, an agent, or both. Note any group entities or third parties involved in delivering payment or safeguarding functions. For each group member identified, note the type of entity (such as branch, subsidiary or nominee company) the group member is, its jurisdiction of incorporation if applicable, and a description of its related operational functions. Reference jurisdictional scope and state whether relevant funds can be held outside the UK and under what circumstances. Include the name each agent or electronic money distributor of the safeguarding institution.

3.0 Governance

Responsibility for CASS operational oversight

Under CASS 15.2.4R, [Firm Short Name] must allocate responsibility for oversight of its operational compliance with the relevant funds regime to a single director or senior manager of sufficient skill and authority.

This individual is responsible for overseeing the operational effectiveness of the firm's systems and controls designed to achieve compliance with CASS 15, reporting to the governing body in respect of that oversight, and ensuring that the firm maintains appropriate records and arrangements to support compliance with CASS 15 and CASS 10A.

Where applicable under the Senior Managers and Certification Regime, this responsibility should be allocated to the appropriate Senior Manager and reflected in the individual's Statement of Responsibilities.

Under CASS 15.2.4R, [Firm Short Name] must allocate responsibility for oversight of its operational compliance with the relevant funds regime to a single director or senior manager of sufficient skill and authority. The individual must report to the firm's governing body in respect of that oversight and should have sufficient authority to ensure that appropriate systems, controls and records are maintained.

[Firm Short Name] has allocated responsibility for oversight of its compliance with CASS 15 and the relevant funds regime to [Name], who is the individual responsible for CASS 15 safeguarding oversight.

The table below shows the history of the individual responsible for CASS 15 safeguarding oversight for [Firm Short Name]:

Name	Designation	Start	End
[Name]	*[Senior Manager responsible for CASS 15 / safeguarding oversight]*	*[Date]*	*[Date / Present]*

Key Personnel

The following senior managers, directors and key employees are important to the performance of operational functions related to the firm's CASS 15 safeguarding obligations:

Name	Title	Responsibilities	Contact
[Name]	*[Title]*	*[Responsibilities]*	*[Email]*

The [Role e.g. Head of CASS / Managing Director], to whom responsibility for oversight has been allocated under CASS 15.2.4R, reports at least annually to the firm's governing body in respect of compliance with CASS 10A in accordance with CASS 10A.1.14R. The annual reports can be located in: [link / file path]

CASS Governance Structure

Note: Insert the firm's CASS governance organisational chart here, showing reporting lines from the CASS SMF holder through to operational CASS functions. If maintained separately, reference its location.

CASS Resolution Pack Attestation

CASS requirement: CASS 10A.1.11R – a firm must ensure any inaccuracy is corrected promptly and in any event no more than five business days after the change of circumstances arose.

Process: To comply with CASS 10A.1.11R, [Firm Short Name] is required to complete a CASS RP checklist and attestation which is signed by the individual responsible for CASS oversight. The checklist captures any changes impacting the accuracy of the CASS RP. [Insert rationale for chosen frequency e.g. on a risk-based approach.]

Attestation frequency: [Quarterly / Monthly / Weekly]

4.0 Client Agreements

[Firm Short Name] has the following client agreements in place where [Firm Short Name] is responsible for the safeguarding of relevant funds and provides [describe services e.g. payment services / e-money issuance] to the following client types in accordance with CASS 15.1.2R and CASS 15.1.3R:

- [e.g. (1) when it receives relevant funds from a payment service user in the course of providing payment services]
- [e.g. (2) when it issues e-money to a customer in exchange for funds received]

Note: Remove any capacities that do not apply to the firm. Reference the relevant CASS 15.1.2R sub-rule for each.

All client agreements are stored at: [link / file path]

5.0 Safeguarding Institutions

[Firm Short Name] has safeguarding arrangements in place with the following institutions:

- *[Safeguarding Institution 1 name]*
- *[Safeguarding Institution 2 name]*
- *[Insurer/Guarantor name]*

Note: List all approved banks, insurers, guarantors or other safeguarding institutions with whom the firm has safeguarding arrangements in place. For each, include a separate sub-section below covering the arrangement, account structure, and contact details. An approved bank for the purposes of CASS 15 must meet the definition in regulation 23(18) and (19) of the PSRs 2017 or regulation 21(7) and (8) of the EMRs 2011.

[Safeguarding Institution 1 Name]

[Firm Short Name] holds relevant funds with [Safeguarding Institution 1 Name] using the segregation method in accordance with regulation 23(5) to (11) of the PSRs 2017 / regulation 21 of the EMRs 2011. Relevant funds are held in a dedicated relevant funds bank account opened in the name of [Firm Short Name] and segregated from the firm's own funds at all times.

A safeguarding account acknowledgement letter has been obtained from [Safeguarding Institution 1 Name] in accordance with CASS 15.7.3R, confirming that the account is held solely for the purpose of safeguarding relevant funds and that the institution has no right of set-off or counterclaim against those funds.

The safeguarding account acknowledgment letter and any agreements/side letters between [Firm Short Name] and [Safeguarding Institution 1 Name] is dated [date] and can be located at: [link / file path]

Note: Insert contact details for this safeguarding institution below, covering day-to-day operations and escalation contacts where applicable.

Contact Type	Full Name	Email	Phone	Role
Day-to-Day Operations	*[Name]*	*[Email]*	*[Phone]*	*[Role]*
Escalation	*[Name]*	*[Email]*	*[Phone]*	*[Role]*

[Safeguarding Institution 2 Name]

[Firm Short Name] holds relevant funds with [Safeguarding Institution 2 Name] using the segregation method in accordance with regulation 23(5) to (11) of the PSRs 2017 / regulation 21 of the EMRs 2011. The account is held in [Firm Short Name]'s books and records under [system name].

Note: Repeat this sub-section for each additional safeguarding institution. Include account name, safeguarding method, and the relevant agreement date for each.

Records and Segregation

[Firm Short Name] keeps up-to-date records and accounts as necessary to enable it to distinguish relevant funds held for one client from relevant funds held for any other client, and from the firm's own funds. Each safeguarding institution opens individual accounts in the name of [Firm Short Name] to ensure the segregation of all relevant funds from the firm's own assets. This ensures all relevant funds can be clearly identified as belonging to the client at any time.

All safeguarding agreements and related documentation can be located at: [link / file path]

6.0 Safeguarding Accounts and Reconciliations

Safeguarding Accounts

The table below provides a summary of relevant funds bank accounts held by [Firm Short Name]:

> *Note: List all relevant funds bank accounts held at each approved bank. Include approved bank name, account name, account number or sort code, entity name, and safeguarding method. For firms with a large retail client base where individual account listing is not practical, replace this table with a reference to the system or register where safeguarding accounts are recorded and the role responsible for providing access on request.*

Approved Bank	Account Name	Account Number / Sort Code	Entity Name	Safeguarding Method
[Approved bank name]	*[Account name]*	*[Account number / sort code]*	*[Entity name]*	*[e.g. Segregation method]*

Records and Accounts

[Firm Short Name] keeps up-to-date records and accounts as necessary to enable it to distinguish relevant funds held for one client from relevant funds held for any other client, and from the firm's own funds, at any time and without delay. Books and records are held in [system name]. This ensures all relevant funds can be clearly identified as belonging to each client at any time.

All safeguarding account records, reconciliation records, client balance records and supporting documentation are stored and can be accessed at: [link / file path].

> *Note: Describe how books and records are maintained. Include the system or platform used, who is responsible for maintaining it, and how it is kept up to date. If records are maintained across multiple systems, describe how these are reconciled and which takes precedence.*

Reconciliations

Reconciliations are performed on each reconciliation day in accordance with CASS 15.8. [Firm Short Name] performs both an internal safeguarding reconciliation under CASS 15.8.10R and an external safeguarding reconciliation under CASS 15.8.47R.

The internal reconciliation compares [Firm Short Name]'s own records of the amounts it should be safeguarding against the D+1 segregation requirement, calculated from individual client safeguarding balances in accordance with CASS 15.8.31R. The external reconciliation compares those internal records against the actual balances held in the relevant funds bank accounts at the approved bank.

If any discrepancies or shortfalls are identified, [Firm Short Name] promptly investigates the reason for the discrepancy and takes appropriate steps without undue delay, including funding any shortfall using the firm's own money until the discrepancy is resolved.

All reconciliations are saved to: [link / file path]

Reconciliation procedures are reviewed [annually / quarterly] to ensure compliance with CASS 15.8 and are stored at: [link / file path]

7.0 Systems and Access

In the event of [Firm Short Name] becoming insolvent, all systems used for the holding, recording and reconciling of relevant funds will remain fully operational and accessible for the duration of the insolvency process. This ensures that an insolvency practitioner can access all relevant positions, records and documentation as soon as practicable and within the 48-hour retrieval requirement under CASS 10A.1.7R.

Systems Overview

The following systems are used by [Firm Short Name] in connection with its CASS 15 obligations:

System Name	Purpose	Access Method	Credentials Held By
[System name]	*[e.g. Relevant funds holding and reconciliation / Payment processing / Client records]*	*[e.g. Web portal / Internal system / Read-only access]*	*[Role / Name]*

> *Note: List all systems material to CASS 15 functions. Include internal systems, safeguarding institution portals, and any third-party platforms. For each system, confirm whether access is read-only or operational, and identify the individual responsible for credentials in the event of insolvency.*

System Access Procedures

Login procedures and access instructions for each system listed above are documented and can be located at: [link / file path]

> *Note: If access to any system requires involvement of a third party (e.g. a safeguarding institution or technology provider), include their contact details here or reference section 6.*

Types of Reports Available

> *Note: For each system, list the key reports available that are relevant to CASS 15 obligations. As a minimum this should cover: relevant funds balances; daily safeguarding reconciliation outputs; transaction history; individual client safeguarding balances; and any pending payment reports. This enables an insolvency practitioner to understand what data is available and where.*

Transfer / Return of Relevant Funds

The process for transferring or returning relevant funds to clients in the event of insolvency is documented and can be located at: [link / file path]

> *Note: This is a requirement under CASS 10A. The document should describe the steps required to transfer relevant funds back to clients or to another safeguarding institution, including any third-party dependencies and estimated timelines.*

8.0 Due Diligence of Third-Party Providers

[Firm Short Name] is responsible for performing an initial assessment of each potential new approved bank, insurer, guarantor, safeguarding institution or other third-party provider it intends to appoint, and for the ongoing monitoring of each appointed provider to ensure they remain fit for purpose.

Due diligence is performed in accordance with the following CASS requirements:

- CASS 15 – the firm must exercise due skill, care and diligence in the selection, appointment and periodic review of third parties involved in safeguarding relevant funds, including approved banks, insurers, guarantors and material operational service providers.

Note: Remove any rules that do not apply to the firm. Add any additional applicable rules.

Initial Due Diligence

Prior to appointing any third party provider, [Firm Short Name] conducts an initial due diligence assessment covering the provider's policies, procedures, financial standing, regulatory status, and operating model. This assessment is documented and retained in the CASS Resolution Pack.

Ongoing Monitoring

Following appointment, each provider is subject to periodic review to ensure they remain fit for purpose. As part of the periodic review, [Firm Short Name] also considers the need for diversification of safeguarding arrangements to mitigate concentration risk, and documents its assessment and conclusions. Reviews are conducted on a [annual / quarterly] basis and are signed off by [Role e.g. Head of CASS / Compliance Manager].

Due Diligence Documentation

All due diligence documentation for third party providers, including initial assessments and ongoing review records, can be located at: [link / file path]

Note: Due diligence should cover at minimum: the provider's regulatory permissions and status; financial strength; operational capability; safeguarding arrangements; and any conflicts of interest. For approved banks, also confirm the institution meets the definition of approved bank under regulation 23(18) and (19) of the PSRs 2017 or regulation 21(7) and (8) of the EMRs 2011. For insurers or guarantors, confirm the policy contains no payout restrictions other than certification of the insolvency event.

Version Control and Approval

Key Document Information

	Prepared by	Reviewed by	Approved by
Name	*[Name]*	*[Name]*	*[Name]*
Role	*[Role]*	*[Role]*	*[Role]*
Date	*[Date]*	*[Date]*	*[Date]*
Next Revision Date	*[Date]*		

Version History

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[V1.0]	*[Date]*	*[Name]*	*Initial draft*