

# Public Interest Framework for a Successful Account- to-Account Payments System

1 July 2025

© Reserve Bank of Australia 2025

For the full copyright and disclaimer provisions that apply to this publication, see  
<https://www.rba.gov.au/copyright>.

# Contents

Introduction	3
The Conceptual Framework	4

# Introduction

This paper provides a high-level conceptual framework for a successful account-to-account (A2A) payments system that serves the public interest – that is, benefits society as a whole. This analysis has been undertaken to underpin the work by the industry, together with the RBA and Treasury, to develop a vision and plan for the future of the A2A payments system.<sup>1</sup>

The A2A payment system is broad in scope, encompassing various payments infrastructures and customer-facing payments services that facilitate payments on behalf of Australian end users (including households, businesses and governments).<sup>2</sup>

In the RBA's view, the public interest for A2A payments can be best served by the payments industry delivering a system that meets the needs of end users at large. A centrepiece of the framework is therefore the achievement of key end-user objectives. Achieving these objectives requires consideration of the end-to-end A2A payments experience, which depends on the performance of the relevant payments infrastructures (including all payments clearing 'rails' and settlement systems) as well as customer-facing payments services.

A successful A2A payments system would achieve the end-user objectives on an ongoing basis. Because end-user expectations and external conditions evolve, the ecosystem will need to adapt and innovate to continue to meet end-user objectives over time. Considering the long-term structural forces affecting payments (i.e. those likely to have an impact beyond 2030) in the work to determine a vision will be important for 'future proofing' the A2A payment system as much as possible.

Finally, this analysis – which is focused on the public interest considerations for determining the A2A payment system vision – does not consider the system's transition to the future state. The transition phase may involve some short-to-medium term trade-offs in pursuit of the end-user objectives. Prioritisation and sequencing issues can be assessed further during the work to develop a plan for achieving the vision.

---

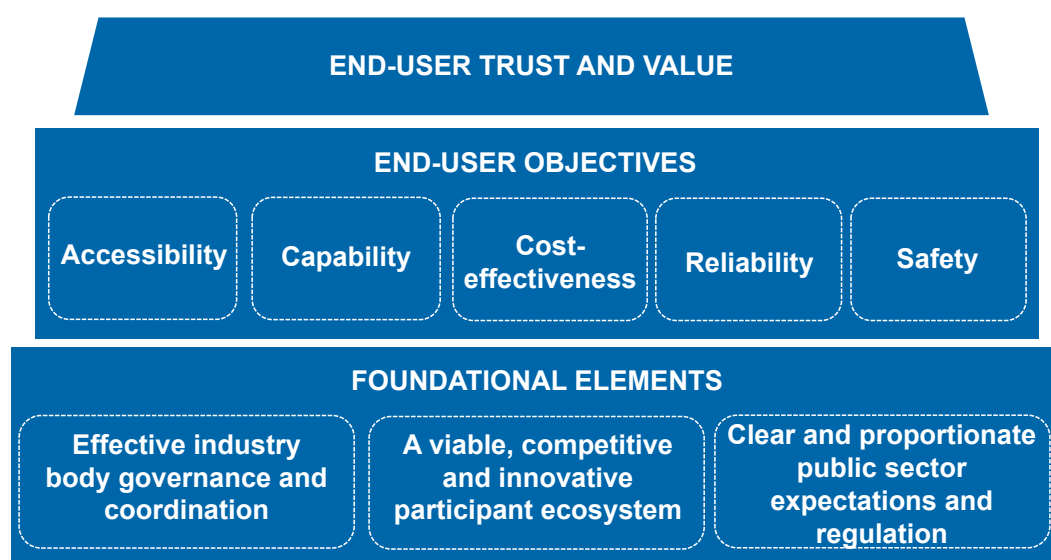
<sup>1</sup> For further details, see recommendations 1 and 4 in RBA (2025), '[Decommissioning of the Bulk Electronic Clearing System: RBA Risk Assessment](#)', March. The framework could also be used to assess current gaps in the existing A2A system against a desired future state.

<sup>2</sup> This definition excludes payments from a financial institution to another financial institution that is the ultimate beneficiary.

# The Conceptual Framework

From a public policy perspective, **the ultimate mark of success for a payments system is that end-users trust the system and derive value from it** for their everyday economic activities (Figure 1, top layer). This can be realised by the A2A payments system continually providing end users (encompassing households, businesses and governments) **widespread access to payments options that are capable of meeting their needs, and that are cost-effective, reliable and safe** (Figure 1, middle layer). Achievement of these objectives requires the entities involved in the system – industry bodies, participants and the public sector – to also put in place the necessary foundational (or ‘enabling’) elements, including governance and coordination arrangements, competitive and innovative behaviours, and clear and proportionate policy or regulatory settings (Figure 1, bottom layer).<sup>3</sup>

**Figure 1: A Framework for a Successful Account-to-account Payments System**



The end-user objectives within the framework are outlined in more detail in Table 1. All of these objectives need to be present for the A2A system to be successful. However, **trade-offs can be involved** – for instance, full reliability in payments could be expensive to deliver, while newly introduced capabilities might be immature from a safety perspective (e.g. higher data privacy or scam risks). Finally, while these objectives have been defined generally and can be considered enduring (i.e. they apply across time periods), **end-user expectations and external conditions will naturally evolve over time as risks, technologies and societal attitudes change. The entities involved in the system will therefore need to be able to adapt and innovate to deliver these objectives on an ongoing basis** (see below).

The foundational elements within the framework are outlined below and in Table 2. These elements should not be considered static – the entities responsible will need to adapt and innovate as circumstances evolve and challenges arise, to deliver ongoing trust and value to end users.

<sup>3</sup> These entities may pursue other goals that act to support, or at a minimum do not conflict with, the end-user objectives. Possible examples include meeting commercial objectives, which can provide participants with the resources to invest in superior A2A payment services, and complying with general financial regulation (such as for consumer protection, financial soundness and financial crime), which can boost safety in A2A payments.



- Governance and coordination by the A2A scheme owner/s, as well as other industry bodies involved in A2A arrangements, is vital to the success of the A2A payment system. **A key driver of effective governance is the mandate of the industry bodies.** Mandates should be designed with the ongoing achievement of end-user objectives in mind, which usually involves the inclusion of public interest considerations (such as competition, efficiency, safety and resilience) in addition to private objectives such as commercial sustainability. Another important aspect of governance is **scheme participation requirements and rules.** These **should be clear, transparent and proportionate**, effectively address all risks to participants and to the reliability and safety of A2A services for end users, while also permit fair and open access for new entrants. The application of appropriate regulatory standards could help the system to meet these aims. The **effective implementation of industry or scheme standards, rules and procedures** is crucial to managing key risks or achieving desired efficiencies across the system. It is thus important that bodies put in place mechanisms to monitor compliance with the requirements, and periodically evaluate whether they are achieving their purpose or need adjustment. For instance, arrangements to deliver reliability or safety should be continually re-assessed against outcomes, evolving risks and changing external conditions.
- The network nature of payments means that a successful A2A payment system requires not only an effective scheme and well-functioning infrastructure, but also **a viable and competitive ecosystem of participants to implement all scheme arrangements and rules and deliver trusted and valued front-end services to end users.** Participants also need to come together to coordinate on shared payments innovations that help achieve end-user objectives and implement these in a timely and effective way.
- **The Government and public authorities also have a role to play in setting public expectations around the strategic direction of the A2A payment system and in regulating participants and industry bodies.** Proportionate regulation of individual participants provides assurance that various risks are adequately managed, payment services are secure and end users (particularly consumers) are protected. Regulation and oversight of payments schemes, industry bodies and infrastructure arrangements is also important for competition, efficiency and safety in the A2A payments system – public interests that are closely aligned with the end-user objectives. The RBA's longstanding regulatory principles for competition and efficiency in the card payments system and the international Principles for Financial Market Infrastructures (PFMI) can provide guidance in this respect.

**Table 1: End-user Objectives of the A2A Payments System**

Accessibility	Capability	Cost-effectiveness	Reliability	Safety
<p>There is <b>universal access</b> to the system for end users to send and receive transactions through a standard payment account and customer channels.</p> <p>The system is inclusive of more <b>vulnerable customer cohorts</b> (e.g. low income users, low digital awareness users, culturally and linguistically diverse users) and can accommodate their needs.</p> <p>End users have a <b>choice</b> over their payments service provider and are able to switch without major friction if they wish to do so.</p>	<p>The system can <b>perform key payment functions</b> (such as authentication and verification of payee, initiation, transmission of payment instructions and related data, clearing and settlement, notification of payment outcome, returns).</p> <p>The system is <b>capable of meeting user needs</b>, with current use cases such as single credit transfers, direct debit, bulk, time-dependent payments and international payments being an indicator of these needs.</p> <p>The <b>end user experience is reasonably seamless or frictionless</b> (e.g. limited information is required to address payments, consistency across key payment processes, payments relevant data can be integrated into reconciliation and other processes).</p> <p>The <b>end user experience is timely</b> (e.g. real-time 24/7 payments options are available).</p> <p>The <b>system is scalable</b> i.e. able to cope with increased activity and the integration of new services.</p>	<p>The charges and other financial costs incurred by end users in making and receiving payments are <b>transparent</b> to end users.</p> <p>The charges and other financial costs incurred by end users are <b>non-discriminatory, reasonable</b> (e.g. not a large mark up on the input costs incurred by service providers) and <b>affordable</b>, in absolute terms and relative to other comparable payment systems.</p>	<p>The system has sufficient planned availability, and resiliency against shocks and stressed conditions, to enable the <b>continuous execution of core payment functions and services</b> across both infrastructure and front-end service layers.</p> <p>Disruptions to service continuity are minimised through robust <b>contingency (back-up) and recoverability arrangements</b>.</p> <p>Payment services perform <b>in a predictable manner</b>, in line with acceptable requirements for service quality.</p> <p><b>Requirements for service availability, performance and quality are documented, and communicated</b> in clear terms to end users.</p> <p>Planned and unplanned <b>deviations from agreed service requirements are communicated to end users</b> and relevant providers as early as possible.</p>	<p>End users' <b>funds in transit, transaction details and personal data are secure and protected</b> by payments service providers and system participants (and their third-party providers).</p> <p>The system implements measures to help <b>prevent end users experiencing fraud and scam activity</b>.</p> <p><b>End users have appropriate means to dispute transactions</b> (including potential fraudulent transactions) and lodge complaints via their payments service provider.</p>

**Table 2: Foundational Elements of the A2A Payments System**

Effective industry governance and coordination	A viable, competitive and innovative participant ecosystem	Clear and proportionate public sector expectations and regulation
<p>Industry bodies or schemes have <b>clear mandates and objectives that explicitly support relevant public interest considerations</b>, while their decision-making processes balance competing interests and incorporate stakeholder views.</p> <p><b>Scheme participation requirements are objective, risk-based</b>, publicly disclosed, and permit fair and open access to the infrastructure across potential participant types and participation tiers.</p> <p>Industry bodies or schemes <b>implement objective standards, requirements and procedures</b> (such as those related to connectivity, payment message formats, payment finality, participant availability and business continuity, payment processing, payment exceptions/disputes, security controls and fraud risk management, data requirements and reporting) that effectively manage the various risks, or achieve desired efficiencies or consistency of experience for end users and providers.</p> <p>Industry bodies or schemes have effective mechanisms to <b>continually evaluate the appropriateness of standards and requirements against needs, monitor participant compliance and remediate any breaches</b>.</p> <p>Industry or scheme standards, requirements and technology arrangements <b>do not inhibit participants or end users from switching their providers</b>.</p> <p>Scheme infrastructure arrangements for <b>processing payments and hosting data are secure and resilient</b>, including those components provided by third-parties.</p> <p><b>Industry or scheme mechanisms for participants to coordinate</b> (such as on the development of new standards or capabilities, crisis management or public communications) are in place and effective.</p> <p><b>Scheme commercial arrangements and wholesale pricing models, treat current and prospective participants fairly, while also supporting commercial sustainability</b> for the system.</p>	<p><b>Providers comply with all payments-relevant legal and regulatory obligations</b>, including those in consumer and data privacy law, AML/CTF and sanction rules, the Australian Financial Services Licence, the ePayments Code, the forthcoming Scams Prevention Framework and the Consumer Data Right.</p> <p>Participants are <b>commercially viable, effectively manage their financial and operational risks</b> (such as those related to data security, fraud, business continuity, system resiliency) and are able to execute their core customer services on an ongoing basis.</p> <p><b>Participants adhere to all industry and scheme standards, rules and processes in a timely manner.</b></p> <p><b>Participants compete to offer prices, service features and terms to end users that are transparent, non-discriminatory, reasonable and affordable.</b></p> <p><b>Participants competitive behaviour</b>, including in relation to wholesale pricing for indirect participants and in mechanisms to develop scheme or industry arrangements, <b>does not impede competition from within the market or new entrants from contesting the market.</b></p> <p>Participants effectively <b>cooperate on, and implement, shared payments innovations</b>, to agreed timelines.</p>	<p>Government and/or public authorities <b>communicate expectations for the strategic direction of the system</b> and their prioritisation relative to other public policy objectives.</p> <p><b>Individual participants, including banks and payments service providers, are proportionately regulated</b> in relation to their governance, financial and operational soundness, cyber and data risk management, financial crime compliance and consumer protection.</p> <p><b>Payment systems</b>, including payment scheme operators/administrators and other participants therein, are <b>subject to proportionate competition, efficiency and safety regulation and oversight.</b></p>