



CASS 15: Strengthening Safeguarding for Payment & E-Money Firms

CASS 15:

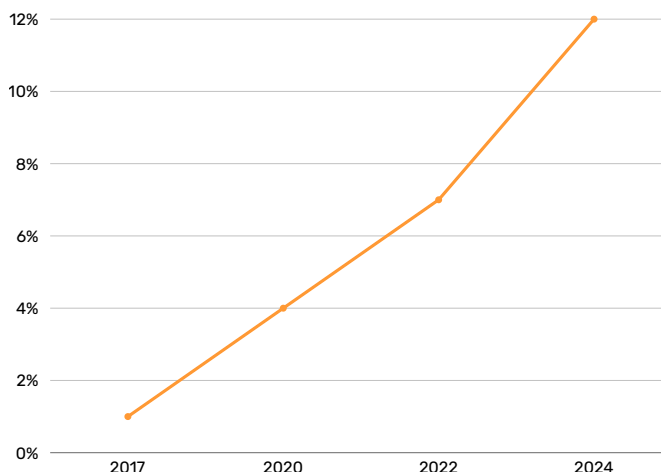
STRENGTHENING SAFEGUARDING FOR PAYMENT AND E-MONEY FIRMS

Payments and e-money institutions in the UK are entering a new era of client fund protection under the Financial Conduct Authority's ("FCA") CASS 15 regime. Effective from 7 May 2026, CASS 15 introduces a much more robust framework for safeguarding customer funds, aligning these firms with standards long applied to investment firms. This white paper provides an overview of CASS 15 for payment and e-money firms, balancing operational guidance with policy analysis. We outline the regulatory evolution leading to CASS 15, the historical shortcomings it addresses, and what firms can expect in terms of compliance costs and industry impact. Our goal is to help firms understand not just the rules, but the context, readiness levels, and long-term benefits of this change. In short, CASS 15 is an opportunity to bolster trust and resilience in the fast-growing non-bank payments sector.

The Evolution of the Payment & Safeguarding Regulations

Payment and e-money firms' safeguarding obligations have historically been set primarily by UK legislation, the Payment Services Regulations 2017 (PSRs) and the Electronic Money Regulations 2011 (EMRs) for safeguarding, rather than under the FCA's Client Assets Sourcebook (CASS) like traditional investment firms. These rules required segregation of customer funds but were relatively high-level and less prescriptive than the full CASS regime. Over the past several years, the non-bank payments sector has grown from a niche to a mainstream part of UK finance.

This surge reflects fintech innovation expanding financial access to markets that traditional banks didn't fully serve, with the share of UK consumers using Payment Institutions (PIs) / Electronic Money Institutions (EMIs) for accounts rising from just 1% in 2017 to 12% in 2024. With such growth, the potential impact of any safeguarding failure is far greater today than a few years ago.



A series of events exposed weaknesses in the existing safeguarding regime and accelerated the shift toward an FCA-led framework. High-profile failures, notably the 2020 collapse of Wirecard's UK arm and the insolvency of e-money firm Ipagoo in 2019, highlighted how customer funds could become inaccessible or legally contested when a non-bank firm failed. In these cases, gaps in safeguarding arrangements meant customers faced uncertainty and delays in getting their money back. Such incidents raised urgent questions about whether the current rules and oversight were sufficient for an industry now holding tens of billions of pounds of customer funds. Both HM Treasury and the FCA took notice: in January 2023, the Treasury formally invited the FCA to review and strengthen the safeguarding regime in light of evolving market practices and legal developments. The FCA's response was swift. It issued a detailed consultation in September 2024 (CP24/20) proposing a new "supplementary" safeguarding regime to modernise requirements and close loopholes. This was accompanied by supervisory communications, including a 2025 "Dear CEO" portfolio letter, signaling firms to start enhancing their practices even ahead of the final rules. In August 2025, the FCA published the final Policy Statement PS25/12, confirming the new rules that will be implemented as CASS 15 in the FCA Handbook. Together, these developments marked a clear regulatory evolution: the oversight of payments safeguarding is moving squarely into the FCA's domain, with a CASS-style rulebook replacing the previously lighter-touch regime.

FCA-Identified Safeguarding Challenges

CASS 15 is explicitly designed to fix the common failures and risks that the FCA found in many payment and e-money firms' safeguarding arrangements. Over several years of supervision and reviews, the FCA noted recurring shortcomings in how these firms protect customer funds.

Inadequate Governance and Oversight

The FCA identified that in many firms, safeguarding was not given sufficient priority at the top. Boards often lacked understanding of the safeguarding rules, and senior management oversight was patchy. This led to situations where, for example, reconciliations were missed for days, or breaches went unreported internally. The FCA's portfolio letter explicitly called out that "weaknesses in governance, oversight and leadership"^[1] controls were a root cause of many issues in the payments portfolio. Some firms had no clearly accountable individual responsible for safeguarding. CASS 15 responds by introducing clearer governance, accountability, and oversight requirements from the top.

Poor Record-Keeping and Reconciliations

A core safeguarding expectation is that firms know at all times how much customer money should be protected and that their records match the funds actually held. The FCA found outdated and inaccurate records, inconsistent reconciliation approaches, and cases where discrepancies were allowed to build up. In insolvency, this created major difficulties in identifying what customers were owed. CASS 15 addresses this through stronger record-keeping and daily reconciliations, helping ensure firms can evidence customer money positions quickly and accurately.

Delayed Segregation & Commingling of Funds

The old regime gave firms flexibility over when to segregate customer funds, which in some cases led to delays and greater exposure to operational or insolvency risk. The FCA also found examples of poor segregation practices, including funds being mixed with a firm's own money or protected too late. CASS 15 addresses this through stricter segregation requirements and a stronger emphasis on prompt protection of customer money.

Lack of Formal Audits and Independent Checks

Under the previous regime, many smaller firms were not subject to mandatory safeguarding audits, meaning non-compliance could go undetected for longer periods. The FCA was concerned that some firms had never been independently reviewed in detail. By extending audit requirements to almost all firms, CASS 15 introduces regular external challenge, improves compliance visibility, and reduces risk of weak practices remaining hidden.

[1] Financial Conduct Authority. Payments Portfolio Strategy Letter 2025. 2025. <https://www.fca.org.uk/publication/correspondence/payments-portfolio-letter-2025.pdf>

Insufficient Safeguarding Funds - Large Shortfalls

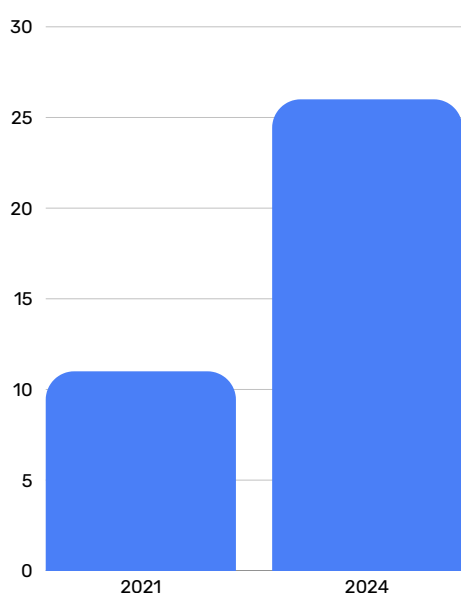
Perhaps the most alarming statistic driving change was the magnitude of losses in recent firm failures. The FCA reported that for payment firms that failed between 2018 and 2023, on average 65% of the customer funds that should have been safeguarded were missing^[2]. This implies that only 35% of the supposedly protected funds were actually there to return to customers, a catastrophic shortfall. CASS 15 is intended to reduce the risk of such shortfalls by requiring more robust reconciliations, better records, and earlier detection of errors.

Slow Returns and Distribution Failures

Even when firms had attempted to safeguard funds, customers often faced delays in getting their money back because records were incomplete, inaccurate, or not easily usable by administrators. The FCA noted that returning funds could take years where firms lacked the information needed to identify customer entitlements efficiently. CASS 15 aims to improve firms' readiness so customer money can be returned faster and with less uncertainty.

Wind-Down Planning Gaps

The FCA also identified serious weaknesses in firms' wind-down plans. Many plans were too high-level and did not reflect the practical complexity of returning customer funds, especially where there were large numbers of customers or incomplete records. This became more significant as customer money held by e-money institutions rose from around £11 billion in 2021 to £26 billion in 2024. CASS 15 strengthens expectations around resolution planning so firms are better prepared to return funds in an orderly way if they fail or exit the market.



In summary, every major component of CASS 15 can be traced to one or more of these common failings. The FCA essentially codified solutions to problems that were observed repeatedly.

By addressing these pain points, the FCA's new rules aim to ensure that if a payments firm fails, customers receive the vast majority of their funds back, and much faster than has been the case historically. In the FCA's own words, poor safeguarding practices in this sector presented "an unacceptable risk of harm to consumers and market integrity"^[2] CASS 15 is the regulator's answer to mitigate that risk.

[2] Financial Conduct Authority. PS25/12: Changes to the Safeguarding Regime for Payments and E-Money Firms. July 2025.

Regulatory Horizon – What's Coming Up

The introduction of CASS 15 represents a pivotal moment in the regulatory oversight of payments and e-money firms. Designed to address longstanding safeguarding challenges, CASS 15 provides a clearer, more prescriptive framework that aligns expectations for these firms with the standards historically applied to investment firms under the broader CASS regime. Unlike previous safeguarding rules under the Payment Services Regulations 2017 and E-Money Regulations 2011, which were often seen as high-level and inconsistently enforced, CASS 15 introduces a structured, auditable compliance model.

The evolution of this regulatory initiative has been guided by HM Treasury's 2023 safeguarding review, followed by a formal consultation process via CP24/20, and culminating in the FCA's policy statement PS25/12. However, CASS 15 is just one part of the broader regulatory landscape being reshaped. The consultation papers CP25/40, CP25/41, and CP25/42 further indicate the FCA's ambition to integrate cryptoassets, stablecoins, and broader digital finance activity within the perimeter of traditional financial regulation. These proposals, when finalised, will bring an increasingly digital payments ecosystem under the same CASS-style oversight, unifying safeguarding, reconciliation, and governance expectations across the spectrum.

Crypto-related activities, including fiat-backed stablecoins and certain types of custody arrangements, are already flagged for inclusion in safeguarding frameworks. As payment and e-money firms increasingly interact with these technologies, either by integrating crypto wallets, enabling stablecoin payments, or acting as fiat ramps, they will find themselves firmly under the CASS regulatory umbrella. This convergence signals the FCA's commitment to future-proofing the financial system.

Looking ahead 5–10 years, we anticipate a matured regime where CASS becomes the standardised benchmark for all non-bank financial intermediaries managing client funds. Monthly safeguarding returns will give the FCA unprecedented trend visibility.

7 May 2026

- From 7 May 2026, CASS 15 (the supplementary safeguarding regime) comes into force. Firms in scope must be operating the enhanced safeguarding framework in a way that is immediately audit-ready, with governance, record-keeping, reconciliations, and evidence trails running as business-as-usual.

13 May 2027

- The first statutory safeguarding audit cycle begins after go-live. Firms can align the audit period covered to their own accounting cycle, but the latest date the first audit period can end is 13 May 2027. This period is where the regime is “tested in practice” – the quality of controls, escalation, and documentation will determine how smoothly the first audit completes.

13 November 2027

- After the audit period ends, the auditor must submit the safeguarding audit report to the FCA within 6 months of the end of the period covered. More broadly, the FCA expects the first wave of statutory audit reports by 13 November 2027 at the latest. This post-implementation stage is critical: audit findings will highlight common weaknesses across the industry, drive remediation programmes, and may increase supervisory focus as firms transition from “implementation” to sustained operational maturity under CASS 15.

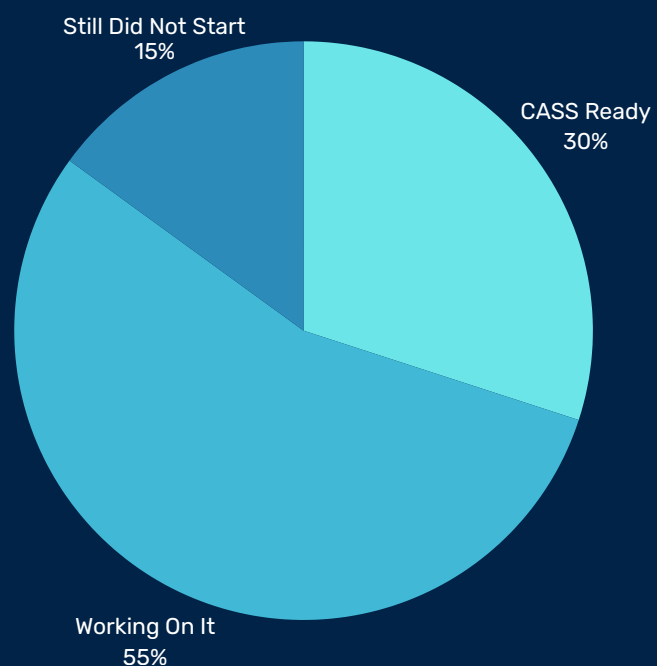
Industry Reaction and Readiness

The introduction of CASS 15 has generally been met with a mix of support and concern among payments and e-money firms. On the positive side, many firms (and industry bodies) acknowledge that clearer and more consistent rules were needed. The old safeguarding guidance left room for varied interpretations; firms that invested in strong controls often felt undercut by those taking a more lax approach. Now, with everyone held to the same detailed standards, there is hope for a “level playing field” and less ambiguity in what is expected. In that sense, CASS 15 can increase trust not only from consumers but among firms themselves – e.g. agents or distributors of e-money can be more confident in a partner’s practices if they know CASS 15 audits and reports apply. The move is also seen as ultimately beneficial for the sector’s reputation: it brings non-bank institutions closer to the rigor that banks and investment firms are subject to, which could elevate confidence in fintech and payments innovators. It’s an opportunity for firms to demonstrate leadership in safeguarding best practice and thereby strengthen their customer relationships.

In response to the new framework, industry experts and practitioners are aligning their internal controls with heightened regulatory expectations. A key takeaway from recent interviews is the emphasis on strong internal accountability. Firms are increasingly prioritising board-level oversight, reinforcing the three lines of defence (3LOD) model, and ensuring a fully documented audit trail. This includes comprehensive management information (MI), training records, and governance evidence to support CASS compliance. As CASS 15 embeds, these elements are being viewed not only as compliance requirements but also as critical pillars of sustainable operational governance.

On the concern side, however, there is no denying that many firms, especially mid-sized and smaller players, are worried about the cost and complexity of implementing CASS 15. While supporting the goals in principle, these firms point out that transitioning to daily reconciliations, maintaining detailed resolution packs, and undergoing annual audits is a significant operational uplift. A common sentiment is that this comes on top of many other regulatory initiatives and tight budgets. In late 2025, a survey of compliance leaders found that 84% agreed their cost of regulatory compliance had increased in the past five years (with 31% citing it had “increased significantly”)^[3]. CASS 15 will undeniably add to that cost burden, at least initially. In industry webinars, firms have voiced concerns about needing to enhance IT systems (for automated reconciliation and reporting), hire or train specialized staff (for managing the new rules and liaising with auditors), and possibly pay for external advice or software tools.

During a webinar held by Pangea Consulting during mid-2025, polling indicated that only roughly one-third of firms felt fully ready for CASS 15, with the majority still in the midst of projects to close compliance gaps highlighting that many are racing against the clock to be prepared by mid-2026. There is particular anxiety in the air for firms that have known weaknesses: they must now not only fix those but also document everything to audit standards.



[3] TheCityUK and PwC. Reducing the Cost of Compliance: Unlocking Efficiency, Competitiveness and Growth for the UK Financial Services Sector. Nov. 2025, <https://www.thecityuk.com/assets/Compliance-Cost-Report-2025.pdf>

Expected Impact to Regulated Firms

CASS 15 will reshape the operating model of payments and e-money firms in the UK. While the regime introduces new cost and delivery pressures, it also creates a clearer benchmark for safeguarding practice and, over time, should raise confidence in the sector. The net impact is likely to be a more mature industry characterised by stronger governance, more consistent safeguarding outcomes, and higher expectations from banks, auditors, partners, and customers.

A key benefit of CASS 15 is the strengthening of consumer trust through clearer and more enforceable safeguarding standards. By requiring routine reconciliations, structured reporting, and enhanced governance evidence, firms are pushed to demonstrate that safeguarding is not only performed but controlled, monitored, and auditable. This improves confidence not only for end users, but also for counterparties such as distributors, programme partners, and banks who often carry reputational or operational risk when working with non-bank institutions.

Compliance cost and resource burden: The new requirements will drive ongoing cost, from audit fees, to potential additional headcount, to investing in systems capable of daily calculations and monthly filings. Smaller firms worry these expenses could squeeze their margins hard. In a recent survey, 72% put reducing complexity and duplication in the rulebook in their top three cost-reduction interventions and tailoring regulation by firm size/complexity was ranked #1 by 44%, and top three by 72%. The UK is seen as more expensive than other markets; among firms operating internationally, 53% said UK compliance costs are somewhat or considerably higher than other jurisdictions. The FCA's own cost-benefit analysis acknowledged an expected £3.9–£8.8 million annual aggregate cost to the industry (central estimate ~£6.2m) for the new regime, or about £53 million present value over 10 years. This covers things like audit costs and the time spent on reconciliations and reporting. While not massive in the context of the entire sector's revenues, these costs will not be evenly distributed, they may hit certain business models disproportionately. A few firms have even intimated that they might rethink offering certain products or might consolidate operations to reduce complexity. The FCA did openly acknowledge that added costs could prompt some smaller or less-resourced firms to exit the market, though it concluded that the benefits to consumers outweigh that risk. Competitive dynamics will be interesting to watch: larger firms may absorb the changes more easily, whereas smaller fintechs might seek mergers or acquisitions if they find the compliance lift too great.

Auditor availability and fees: A major practical concern is whether there are enough auditors with relevant safeguarding expertise to serve all newly in-scope firms. Industry feedback during consultation suggested this could increase fees and create capacity pressure in the short term. The FCA responded by coordinating with audit firms and introducing a 6-month grace period for the first audit cycle, meaning first audit reports will not be due until late 2027. Even so, firms are expected to prepare early. FCA estimates suggest a small or medium firm's audit could cost around £10k–£30k with a smaller provider, compared with £30k+ for a large-firm audit. For complex or large institutions, annual audit fees could reach the six figures if a Big Four auditor is used. Beyond fees, firms will also need internal resources to become fully “audit-ready”, with clear policies, organised records, and evidence trails.

Systems Upgrades and Automation: CASS 15 is also likely to accelerate investment in systems and automation. Processes that rely heavily on spreadsheets or manual work may not be sustainable where firms are expected to perform daily reconciliations and maintain reliable, auditable records. Many firms are therefore expected to invest in reconciliation technology, exception monitoring, stronger ledger controls, and reporting tools. Survey data also points in this direction: 59% identified process simplification, 54% technology adoption, and 48% better data quality as reinforcing drivers of efficiency. While implementation may be costly in the short term, stronger systems should improve operational resilience, reduce manual error, and support more effective safeguarding over time.

Skilled Personnel and Training: The new regime will also increase demand for safeguarding expertise. Firms will need people who understand reconciliation, governance, reporting, and audit expectations, while boards and senior management will need clearer oversight of safeguarding risks. This is likely to increase demand for specialist hires, advisory support, and targeted internal training. Operational teams, finance teams, and boards will each need to understand their responsibilities more clearly. The FCA's governance emphasis also means boards will expect regular management information on safeguarding outcomes, exceptions, and near-misses, making internal accountability frameworks a core part.

Impact on Business Models and Competition: CASS 15 may also influence business models and market structure. Higher fixed compliance costs could create a greater barrier to entry for smaller or newer firms, particularly those holding customer funds directly. Some firms may prefer agency or partnership structures rather than taking on full safeguarding obligations themselves. Larger firms may be better placed to absorb the added burden through economies of scale, while smaller firms may streamline offerings, partner with others, or consider consolidation. There may also be indirect effects in banking relationships if safeguarding banks become more selective or increase fees. From a policy perspective, however, the intended result is a more resilient sector with stronger standards and greater long-term confidence.

What The Next Few Years Will Look Like

Looking ahead, the period of 2026–2027 will be critical for the industry to demonstrate the effectiveness of CASS 15. By mid-2026, firms will have (hopefully) implemented the required changes and the new rules will go live. We anticipate an initial adjustment period where both firms and regulators learn how the regime works in practice for the Payments sector. Here are some expectations for the post-implementation trajectory:

Early identification of issues: Once daily reconciliations and monthly reporting kick in, it's likely that some firms will uncover discrepancies or operational issues they weren't previously aware of. This is a feature of the new regime - better to find and fix problems in real time than to have them fester. The FCA's monthly return will compel firms to report if they had a shortfall and whether it was made whole. We expect the FCA to analyze these returns closely. They will look for red flags (like repeated shortfalls, or firms struggling to submit reports on time) to target supervisory engagement. The regulator has stated that more detailed and frequent data will facilitate early intervention if firms aren't meeting expectations. So firms that have rocky starts may get calls or visits from supervisors in late 2026. On the positive side, early identification of risks means problems can be addressed before they blow up, preventing harm to consumers. We might see an increase in minor "incidents" reported in 2026 simply because the monitoring is tighter, but that should translate into a decrease in major failures or losses over time.

Industry learning curve: By the end of 2026, the industry will have a much clearer sense of what "good" looks like under CASS 15. We'll have gone through at least a few cycles of reporting. Industry groups will likely share anonymised trends. If common issues are emerging, these can be raised to the FCA or solved collaboratively. The FCA may also provide feedback or clarifications based on the first wave of implementation. It wouldn't be surprising to see additional guidance or FAQ documents issued once the regulator sees how firms are interpreting certain rules.

First audit cycle results: A major milestone will be the first annual safeguarding audits, which most firms will undergo in the second half of 2027 (covering the 12 months after May 2026). The latest date for initial audit reports to reach the FCA is November 2027 (since firms get 6 months after the first year-end). These audits will be very telling. Ideally, most firms will pass with clean (or at least not adverse) audit opinions. The FCA will consider it a success if, over 90% of firms get a positive or limited issues report, meaning no systemic failures in safeguarding. If a significant chunk of firms receive adverse audit opinions (meaning auditors found material non-compliance or unreliable controls), that will signal lingering problems. However, given the preparation underway, we are optimistic that most firms will have strengthened their controls by then. The audit reports will also provide a wealth of information to regulators: common findings, areas where firms struggled to comply, etc. This will feed into that future post-implementation review the FCA promised. We expect the FCA in 2028 to publish some summary of the audit cycle outcomes (without naming firms) to highlight lessons learned.



Reduced shortfalls and incidents: The ultimate measure of success for CASS 15 is whether it reduces the incidence of client harm, specifically preventing shortfalls and speeding up returns of money. By late 2027 and 2028, we should start seeing data that indicates improvements. For example, if a payments firm were to fail in 2027, ideally the shortfall (if any) is much smaller than the 65% average seen previously, and customers get their funds back in weeks or a few months, not years. In ongoing operations, firms should routinely be topping up any shortfall from their own funds (as required), so customers are always 100% covered. The FCA's hope is that shortfalls will be identified and resolved so quickly that they never grow into a huge problem. The FCA will consider CASS 15 a success if there is a decline in the percentage of shortfalls of relevant funds due to safeguarding requirements, and if there is a decline in supervisory cases relating to deficient safeguarding practices.

Greater automation and innovation: As the sector adjusts, we expect increased automation in safeguarding processes. By 2027, many firms will have moved away from manual spreadsheet reconciliations to integrated systems that can reconcile continuously or intra-day. Some firms may adopt intraday reconciliation not as a formal requirement, but as a best practice to ensure their end-of-day positions are correct. Doing intraday checks can make the final reconciliation much smoother. Additionally, the industry might leverage emerging tech: we could see AI tools to detect anomalies in client fund flows or blockchain-based solutions for transparent fund segregation. A recent compliance report highlighted that investment in technology (including generative AI) is now viewed as the most impactful intervention to reduce compliance costs, so the incentive is there to innovate. Over time, as these technologies mature, compliance processes that today seem cumbersome could become more seamless, potentially flipping the script such that safeguarding compliance is largely automated and cost-effective, instead of manual and costly.

Cultural normalisation: By 2028, safeguarding under CASS 15 should become a "new normal" part of business as usual. We anticipate a maturation where the initial flurry of project activity subsides and firms integrate these controls into their ongoing risk management framework. The conversation will shift from "are you ready for CASS 15?" to "how can we optimise our safeguarding operations further?" In other words, the sector's overall compliance maturity will rise. Just as many investment firms today handle CASS requirements as routine (with periodic fine-tuning), payment firms will get there too. Firms might even find competitive advantages in touting their strong safeguarding: much like a bank advertises its safety, a non-bank provider might use compliance excellence as a selling point to partners or customers ("your money is safe with us, our audit opinions and track record prove it"). Enhanced trust could expand the customer base for these services, benefiting firms that excel.

A Practical CASS 15 Readiness Framework

To make CASS 15 manageable, firms should avoid treating it as a disconnected list of rule changes. A more effective approach is to structure readiness around four pillars.



This framework shows how firms can translate CASS 15 readiness into four practical and connected areas of focus. Governance and Oversight provides the accountability, challenge, and decision-making structure around safeguarding; Safeguarding Operations focuses on how the regime works in day-to-day practice; Systems and Data supports the accuracy, completeness, and traceability needed to operate effective controls; and Reporting and Audit ensures firms can evidence compliance through monitoring, reporting, and assurance. Together, these four pillars provide a more structured and manageable way to assess readiness, prioritise remediation, and build a safeguarding framework that is sustainable in practice.

Where Your Company Should Be

Use this period to assess the current state, identify the most material gaps, and confirm ownership across governance, operations, finance, compliance, and systems.

Key priorities:

- Conduct a CASS 15 gap assessment
- Map rules to existing processes and controls
- Identify weaknesses in reconciliations, segregation, and recordkeeping
- Confirm governance and executive sponsorship



Phase 1: 0-3 Months



Phase 2: 3-9 Months

From 7 May 2026 until the firm's reporting year end
Focus on embedding the framework in practice by strengthening controls, improving operations, and ensuring documentation and evidence are fit for reporting and scrutiny.

Key priorities:

- Complete remediation of key gaps
- Strengthen governance, reporting, and escalation
- Improve reconciliations, data quality, and evidence trails
- Finalise policies and supporting documentation

After the deadline, the focus shifts to assurance and sustainability. Firms should test whether the framework is operating effectively and can be maintained on a business-as-usual basis.

Key priorities:

- Compliance monitoring plan
- Internal audit plan
- Identify improvement areas
- Remediation and enhancement



Phase 3: 9 Months+

CASS 15:

HOW PANGEA CAN HELP

Pangea supports payment and e-money firms in turning CASS 15 requirements into practical, audit-ready implementation plans. Our focus is not just on interpreting the rules, but on helping firms embed them in a way that works operationally.

Our support includes:

Governance and Oversight



Target Operating Model



Policies & Procedures



CASS Audit Preparation and Support



CASS Processes, Controls and Total Capture



CASS 15 Readiness Reviews



CASS Training



Total Capture CASS 15 Scope Assessment



CASS Resolution Pack and Wind-Down



Simulation s166 Reviews



CASS Risk and Control Framework



CASS Project and Change Management



CASS Compliance



CASS Internal Audit



Technical Queries and Ongoing Advice



Zakir Karim
Managing Director

zakir.karim@pangea-c.com



John Sweeney
CASS SME

john.sweeney@pangea-c.com



Jeshen Naidoo
CASS SME

jeshen.naidoo@pangea-c.com



Samer Baqain
CASS Consultant

samer.baqain@pangea-c.com

Conclusion

CASS 15 represents a step-change in how the UK payments and e-money sector safeguards customer funds. It codifies the lessons learned from past failures and shifts the industry toward a more structured, auditable, and governance-driven model. In the near term, firms will face real delivery pressure: higher compliance costs, greater documentation demands, and operational uplift to meet daily reconciliation and reporting expectations. Industry sentiment reflects this reality, with many firms still working to close gaps ahead of May 2026 and broader compliance surveys indicating sustained upward pressure on regulatory costs.

However, CASS 15 should not be viewed purely as a compliance burden. The regime sets a clearer baseline that can improve consumer trust, strengthen partner confidence, and accelerate operational maturity across the sector. Firms that treat CASS 15 as an operating model upgrade, investing in automation, clean data, strong governance routines, and defensible evidence trails, are likely to be better positioned for supervisory scrutiny, audit outcomes, and sustainable growth. Over the next few years, as reporting trends and audit findings surface, the sector will move into a post-implementation phase where lessons learned drive further standardisation and refinement. In that sense, CASS 15 is best understood as a foundation: a new benchmark for safeguarding that supports a more resilient and credible non-bank payments ecosystem.