

Proposed EPC Recommendations for the Matching Processes under the VOP Scheme Rulebook



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I. Introduction

This document outlines the EPC recommendations for the matching outcomes for the Payment Counterparty attribute combinations supported in section 3.2 of the proposed 2024 Verification Of Payee (VOP) Scheme Rulebook version 0.1 (EPC 218-23 v0.1 dated 20 February 2024).

This document is referred to in section 3.3 of the above-mentioned VOP Scheme Rulebook version. It does not form part of the VOP Scheme Rulebook, but it provides guidance to the Responding PSP on how to manage matching processes under the VOP Scheme Rulebook.

This document gives the EPC the possibility to adapt its recommendations for the matching outcomes under the VOP Scheme outside the regular scheme rulebook release management cycle, as defined in Chapter 5 of the VOP Scheme Rulebook, by further taking into account relevant market feedback and input.

The Responding PSP bears the full responsibility for the matching outcome and therefore remains entirely free to apply different criteria to determine the result of the matching process and whether that constitute a Match, a Close Match, or results in a No Match.

This document provides the Responding PSP with recommendations on how the Responding PSP may determine the outcome of the matching process. The aim is to ensure user-friendliness, and to avoid to the maximum extent possible unnecessary “No Match” Responses and payment initiation friction.

II. EPC recommendations for the combination Payment Account Number-Name of the Payment Counterparty

It is at the discretion of each Responding PSP to determine whether a matching result is a Match, Close Match or a No Match. The Responding PSP takes up the liability for providing such response to the Requesting PSP.

These rules apply to the Name of the Payment Counterparty related to Payment Accounts held by one or more than one natural person, and to Payment Accounts held by a legal person.

Responding PSPs are strongly recommended to advise the Payees to communicate their correct and complete name to their Payers to reduce unnecessary “No Match” Responses and payment initiation friction.

0. Data clean-up of the provided Name of the Payment Counterparty

Before the matching verification itself starts, the Responding PSP cleans the Name of the Payment Counterparty provided by the Requesting PSP. Following minimum actions are done:

- Ignore upper or lower case;
- Change diacritics/accents unless the Responding PSP is able to compare the received Name of the Payment Counterparty with normal Latin characters (e.g., ü = u; ê = e; â = a; à = a; ö = o = ø = oe ; ä = a = æ = ae ; å = a = aa ; é = e = ee);



- Apart from numbers, other non-alphabetic characters (e.g, ` ~ @ # \$ % ^ & * - + = | \ { } [] : ; " ' < > , . ?) are removed according to the EPC character set recommendations defined in the document 'SEPA Requirements for an Extended Character Set (UNICODE Subset) - Best Practices' ([EPC217-08](#)) unless the Responding PSP is able to compare;
- Honorifics and titles (e.g., Dr., Mr., Ms) in the name string are removed;
- Truncate leading or trailing spaces.

1. Match

The Name of the Payment Counterparty as given by the Requester is said to be a Match with the name registered by the Responding PSP when there is an exact match (i.e. no deviation at all) of the first name and the last name (in the unstructured name string).

However, each scenario mentioned below on its own or in combination with another scenario mentioned below is also regarded as a Match. When the provided name falls within the scenario(s) below, the Responding PSP can thus report the provided name as a Match to the Requesting PSP.

The following scenarios may also be considered as a Match:

- a) Fully correct first name and fully correct last name of at least one of the payment account holders is provided;
- b) Trade name instead of the legal name of the legal person-Payment Counterparty is provided and the Responding PSP can rely on reliable trade name(s) information (e.g., internal sources or trustful external sources, LEI, etc) about that Payment Counterparty.

2. Close Match

The purpose of a "Close Match" is that the Requester should not receive the answer "No Match" if there is only a **small deviation** between the name given by the Requester and the name registered by the Responding PSP. In such cases the response should be "Close Match". The aim of the "Close Match" scenario is to ensure user-friendliness, and to avoid too many unnecessary "No Match" Responses and payment initiation friction.

Together with the "Close Match" Response, the Responding PSP also sends the Name of the Payment Counterparty to the Requesting PSP. The Responding PSP is strongly recommended to apply data minimization when submitting a name in the "Close Match" Response. The Responding PSP provides the Requesting PSP with only name information about the Payment Counterparty as mentioned in the VOP Request. The Responding PSP does not disclose the name of any other payment account holder(s) assigned to that Payment Account Number.

The following scenarios set the minimum criteria for a Responding PSP to determine whether the provided Name of the Payment Counterparty by the Requester can be considered as a Close Match, or not. These scenarios apply to the Name of the Payment Counterparty related to Payment Accounts held by one or more than one natural person, and to Payment Accounts held by a legal person.

Each scenario mentioned below on its own or in combination with another scenario/other scenarios mentioned below is regarded as a small name deviation. When the provided name falls within the scenario(s) below, the Responding PSP can thus report the provided name as a Close Match to the Requesting PSP.



However, each Responding PSP maintains the discretion to apply additional criteria to determine when the result of the matching process is a Close Match or not. Within its additional Close Match criteria, each Responding PSP may apply a further distinction of Close Match criteria between natural persons and legal persons. A Responding PSP may thus apply more stringent criteria for natural person names compared to legal person names (or vice-versa).

Following scenarios may be considered as a Close Match:

- a) If the spelling mistake does not exceed the defined level set by the Responding PSP in one of the provided first name(s) or last name(s) of the payment account holder(s) (e.g., Levenshtein distance);
- b) Two letters in the provided first name or last name of the payment account holder(s) have been switched;
- c) The provided first name and the last name of the payment account holder(s) do not appear in the right order;
- d) The name string misses the first name of the payment account holder(s) - the name string contains just the last name of the payment account holder(s);
- e) A letter (or 2) is replaced by another (or 2) with same phonetics;
- f) Initial of the first name of payment account holder(s) is (are) used instead of the full first name(s);
- g) Well-known nicknames/informal first names used instead of the formal first name(s) (like Bob instead of Robert) if supported by the Responding PSP;

3. No Match

No Match is for a situation whereby the matching result does meet neither the “Match” nor the “Close Match” criteria.

III. EPC recommendations for the combination Payment Account Number-identification code of the Payment Counterparty

When the Payment Counterparty is a legal person and the Requesting PSP offers a payment initiation channel which allows the Requester to submit the Payment Account Number of the Payment Counterparty together with an identifier alongside the Name of the Payment Counterparty that unambiguously identifies that Payment Counterparty being an identification code such as VAT number, Legal Entity Identifier, etc, the Requesting PSP can submit that identification code together with the Payment Account Number and the Name of Payment Counterparty to the Responding PSP.

The assumption is that unambiguous identification codes follow a well-defined structure set by national, EU or international public or private organizations. The matching result on such codes can only be binary i.e. a Match or a No Match. There is no Close Match possible.

0. Data clean-up of the provided identification code

Before the matching verification itself on this combination starts, the Responding PSP cleans the provided identification code. Following minimum clean-up actions are done:

- Ignore upper or lower case;



- Apart from numbers, other non-alphabetic characters (e.g, ` ~ @ # \$ % ^ & * - + = | \ { } [] : ; " ' < > , . ?) are removed;
- Change tabs into spaces;
- Remove excess spaces.

1. Match

The identification code of the Payment Counterparty as given by the Requester is said to be a Match with the identification code of the Payment Counterparty registered by the Responding PSP when there is an exact match (i.e. no deviation at all) between the given identification code and registered identification code.

2. No Match

No Match is for a situation whereby the matching result does not meet the “Match” criterion.

IV. Governance Process to Review the EPC recommendations for the matching processes

These Recommendations will need constant development and optimisation to obtain a balance between “Close Match” and too many “No Match” Responses. At the earliest one year after the 2024 VOP Scheme Rulebook has entered into force, the EPC recommendations for the matching processes can be reviewed outside the regular VOP Scheme Rulebook change management cycle.

This means that as of **Date-Month** 2026 (*to be defined at a late stage*) onwards:

- The Payment Scheme Management Board (PSMB) will formally analyse once a year if there is a need to adapt these recommendations.
- VOP scheme participants supporting the role of **Responding PSP** may send at any time a written suggestion to the PSMB (PSMB@epc-cep.eu) for proposed changes to these recommendations as only they perform the matching actions. The PSMB will review such suggestions at its next physical meeting (the PSMB meeting meets in February, April, September and October of each year).

The PSMB will decide whether it wishes to organise a consultation among all VOP scheme participants being Responding PSPs on the proposed new and/or amended recommendations outside the regular VOP Scheme Rulebook change management cycle. The PSMB will define the duration of this consultation.

Based on the consultation input from the VOP scheme participants, the PSMB will assess whether there is sufficient support to the proposed new and/or amended recommendations.

The PSMB communicates directly to all VOP scheme participants on its decision for new and/or amended recommendations. Any new or amended recommendations will be applicable at the earliest 90 calendar days after the publication of the updated version of this document including the new or amended recommendation on the EPC website.

The PSMB maintains the right to amend the existing recommendations and/or to introduce new recommendations at a very short notice in case of emergency situations. This notice may be shorter than the above-mentioned time scales depending on the circumstances as determined by the PSMB.



V. Disclaimer

These recommendations are developed and updated on best effort basis to ensure user-friendliness, and to avoid too many unnecessary “No Match” Responses and payment initiation friction.

However, it is at the discretion of each Responding PSP to determine whether a matching result is a Match, Close Match or a No Match. The Responding PSP takes up the liability for providing such Response to the Requesting PSP.