Module E — Monitoring, information sharing and authentication

Editorial implementation aid; suggested owners and metrics are not statutory role titles or mandated KPIs.

Decisions

• Fund evidence delivery to the payer covering both providers.

• Approve proportionate data-sharing governance and retention controls.

• Set authentication, customer-warning and employee-training control owners.

Risks

• Monitoring performed without evidence supplied to the payer leaves a separate refund route.

• Excessive retention or unassessed shared intelligence creates data and customer risks.

• EBA draft deadlines can be mistaken for adopted technical standards.

Dates and triggers

• Article 87(3): payer provider before execution; recipient provider before funds availability.

• Article 86(1) and 90(4): at least annual fraud reporting and relevant employee training.

• Articles 86(4), (5) and 97(2): EBA draft submission by entry plus 12 months; general application remains entry plus 21 months.

Accountable owners

• Fraud director: monitoring effectiveness and evidence delivery.

• Data protection officer: sharing assessment and retention oversight.

• Authentication and reporting owners: service controls and data quality.

Measures

• Share of sampled transactions with timely evidence for both providers supplied to the payer.

• Number of sharing decisions lacking independent assessment or required safeguards.

• Training completion and reconciliation exceptions in refund/refusal reporting.

Council 8543/1/26 REV 1, 4 November 2026. Checked 2026-11-19. Article 87(1)–(6); Article 88(1)–(5); Article 86(1), (4), (5); Article 90(1), (4); Article 91(1), (9); Article 97(2)

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