
FINAL NOTICE

To: **Keyvolute Limited t/a Payshot Limited**

Address: **Clyde House, Reform Road, Maidenhead, Berkshire, SL6 8BY**

FRN: **917340**

Dated: **17 June 2024**

ACTION

1. For the reasons set out in this Final Notice, the Authority hereby takes the following action against the Firm.
2. Pursuant to regulations 10(1)(a) and (h) (as applied by Regulation 15) of the PSRs, the Authority has decided to cancel the Firm's registration as a Small Payment Institution ("SPI").
3. The Authority issued to the Firm a Warning Notice and Decision Notice which notified the Firm of its decision to take the action specified above. Although the Firm has been in contact with the Authority, it did not make any representations within 28 days of the date of the Warning Notice and has not referred the matter to the Tribunal within 28 days of the date of the Decision Notice. Accordingly, the Authority has today cancelled the registration granted to the Firm, as a SPI under the PSRs.

DEFINITIONS

4. The definitions below are used in this Final Notice (and in the Annex):

"the Act" means the Financial Services and Markets Act 2000;

“the Authority” means the Financial Conduct Authority;

“the Decision Notice” means the Decision Notice issued by the Authority to the Firm dated 23 April 2024;

“DEPP” means the Decision Procedure and Penalties Manual;

“EG” means the Authority’s Enforcement Guide;

“the Firm” means Keyvolute Limited t/a Payshot Limited;

“the Handbook” means the Authority’s Handbook of rules and guidance;

“the PSRs” means the Payment Services Regulations 2017;

“Return” means the annual regulatory report submitted by a SPI to the Authority using form FSA057;

“SPI” means Small Payment Institution as defined in regulation 2(1) of the PSRs;

“the Tribunal” means the Upper Tribunal (Tax and Chancery Chamber);
and

“the Warning Notice” means the warning notice given to the Firm dated 16 February 2024.

RELEVANT STATUTORY PROVISIONS

5. The statutory and regulatory provisions relevant to this Final Notice are set out in the Annex.

FACTS AND MATTERS RELIED ON

6. The Firm was registered as a SPI by the Authority on 1 May 2020.
7. SPIs are required by rules made by the Authority under the PSRs to report certain information to the Authority, by way of a Return, on an annual basis. The Return is made by submitting a form FSA057. The Return includes details of the payment services provided by the SPI in the preceding year.
8. The Firm submitted a Return covering the period 1 January to 31 December for each of the years 2020, 2021 and 2022. In each Return, it reported having undertaken no payment services, nor any other business. The Firm has undertaken no payment services since it was registered as a SPI.
9. On 19 September 2023, the Authority sent a letter to the Firm by post and by email, notifying it of the Authority’s view that it appeared not to have provided payment services within a period of 12 months and that its registration may be cancelled on that basis. The Firm failed to respond adequately.
10. Through the Warning Notice, the Authority gave notice that it proposed to take the action described above and the Firm was given the opportunity to make representations to the

Authority about that proposed action.

11. Although the Firm has been in contact with the Authority, it has failed to make any representations. Therefore as no representations have been received by the Authority from the Firm within the time allowed by the Warning Notice, the default procedures in DEPP 2.3.2G permit the matters/allegations described in the Warning Notice to be regarded as undisputed.
12. The Authority has therefore decided to cancel the Firm's registration for the reasons described above.

REASONS FOR THE ACTION

13. The Authority has concluded that, on the basis of the facts and matters described above, the Firm did not provide payments services within 12 months beginning with the date on which the registration took effect. This provides a basis for cancelling the Firm's registration in accordance with regulation 10(1)(a) (as applied by regulation 15) of the PSRs.
14. Furthermore, the Firm has not provided payment services since its registration. The Authority has decided that the Firm does not require its registration and therefore that its registration as a SPI should be cancelled in order to protect the interests of consumers, in accordance with regulation 10(1)(h) (as applied by regulation 15) of the PSRs.
15. The Authority has therefore cancelled the Firm's registration as a SPI for the reasons described above.

REPRESENTATIONS

16. The Firm has made no representations in respect to the matters that relate to this Final Notice.

PROCEDURAL MATTERS

17. This Final Notice is given to the Firm in accordance with section 390(1) of the Act (as applied by paragraph 10 of Schedule 6 of the PSR's).

Decision maker

18. The decision which gave rise to the obligation to give this Final Notice was made by an Authority staff member under the executive procedures.

Publicity

19. Sections 391(4), 391(6) and 391(7) of the Act (as applied by paragraph 10 of Schedule 6 of the PSRs) apply to the publication of information about the matter to which this Final Notice relates. Under those provisions, the Authority must publish such information about the matter to which this Final Notice relates as the Authority considers appropriate. The information may be published in such manner as the Authority considers appropriate. However, the Authority may not publish information if such information would, in the opinion of the Authority, be unfair to the Firm or prejudicial to the interests of consumers.
20. The Authority intends to publish such information about the matter to which this Final

Notice relates as it considers appropriate.

Authority contact

21. For more information concerning this matter generally, the Firm should contact Connie Wray at the Authority (direct line: 020 7066 0828).

Jeremy Parkinson
Enforcement and Market Oversight Division

ANNEX

RELEVANT STATUTORY PROVISIONS

1. The Authority's operational objectives established in section 1B of the Act include protecting and enhancing the integrity of the UK financial system and securing an appropriate degree of protection for consumers.
2. Regulation 15 of the PSRs provides:

"Regulations 7 to 12 apply to registration as a small payment institution as they apply to authorisation as a payment institution as if—

(a) references to authorisation were references to registration;

[...]."
3. Regulation 10(1)(a) of the PSRs (as applied by regulation 15) gives the Authority the power to cancel the registration of a small payment institution where the firm does not provide payment services within 12 months beginning with the date on which the authorisation took effect.
4. Under Regulation 10(1)(h) of the PSRs (as applied by Regulation 15), the Authority may cancel the registration of a SPI where the cancellation is desirable in order to protect the interests of consumers.

RELEVANT HANDBOOK PROVISIONS

5. In exercising its powers to cancel the registration of a SPI, the Authority must have regard to guidance published in the Handbook and in regulatory guides, such as EG. The main considerations relevant to the action stated in the Decision Notice are set out below.
6. The Authority's policy in relation to exercising its enforcement powers is set out in EG, the relevant provisions of which are summarised below.
7. EG 19.20.2 provides that the Authority's approach to enforcing the PSRs will mirror its general approach to enforcing the Act.
8. EG 19.20.5 provides that, in relation to the PSR, the Authority has decided to adopt procedures and policies in relation to the use of its sanctioning and regulatory powers, akin to those it has under the Act.