

Rt. Hon Lord Hanson of Flint
Minister of State
House of Commons
London
SW1A 0AA

23rd January 2026

RE: PROPOSALS FOR TECHNOLOGY AND TELECOMMUNICATIONS COMPANIES TO REIMBURSE VICTIMS OF FRAUD:

The Online Dating and Discovery Association (ODDA) is the recognised trade body for the sector with a mission to create safe, responsible and enjoyable experiences for everyone. Representing nearly 500 brands worldwide, our sector contributes over £400 million to the UK economy each year.

Tackling fraud is the number one priority for our sector. Significant investment in fraud detection tools, improved information sharing between platforms and increased support for users have made it much harder for fraudsters to target users of dating and social discovery apps in the UK.

However, we are concerned by recent calls for an expansion of the Authorised Push Payment (APP) Fraud Reimbursement Scheme to make technology and telecommunications companies liable for reimbursing victims of fraud.

Lord Vaux's proposal to amend Clause 117 of the Crime and Policing Bill requiring the Secretary of State to "*bring forward proposals to ensure that technology and telecommunications companies have a duty of care to prevent fraud and meet a share of the costs of reimbursing APP fraud victims*", would have a catastrophic impact on our sector and the wider digital economy.

Shifting liability to tech firms would undermine existing efforts to improve collaboration, which successive Governments have emphasised the importance of in tackling fraud. This has led to innovative partnerships, better cross-sector working and a whole-society approach that is already making a difference.

Furthermore, tech platforms are not directly involved in payment processing with the majority of fraud taking place off-platform and away from the safety and security of the in-app messaging service. It would therefore be grossly unfair to make firms in our sector liable for any losses this way. Extending the scheme would also add significant complexity in determining where liability rests if the fraud takes place across more than one platform.

The ODDAs view is that the Government should continue to support continued collaboration and cross-sector information sharing rather than create additional legal obligations that

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undermine existing efforts and risk damaging economic growth. We therefore welcome the Government's response to Lord Vaux's proposed amendment in that it would undermine the UK's long-standing intermediary liability regime, leaving the UK out of sync with international partners.

We would also like to draw attention to the fact that the Online Safety Act (OSA) already requires in-scope services to take proactive steps to stop fraudulent content appearing on their platform and to remove it when they become aware of it. Failure to do so risks significant financial penalties. Extending the APP Fraud Reimbursement Scheme is therefore unnecessary.

We look forward to the publication of the new Fraud Strategy and continuing to support the Government in making the UK the safest place to be online.

Yours sincerely,



Simon Newman
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