

Digital Payment Frauds in India

A Comprehensive UPSC CSE & APSC Study Module
GS Paper II & III | Economy · Governance · Technology

14-Section Analytical Framework

Key Terms · Historical Evolution · Multidimensional Analysis · PYQs · Model Answers
UPSC CSE 2026 | APSC CCE

Module Overview	Details
GS Paper	Primary Linkage
GS Paper II	Governance, Digital Public Infrastructure, RBI Regulation
GS Paper III	Indian Economy, Fintech, Cybersecurity, Inclusive Growth
GS Paper IV	Ethical frameworks in financial governance
Essay	Technology, Trust, and Inclusive Growth

Section 1 — Key Terms and Explanations

► 1.1 Digital Payment Ecosystem — Core Vocabulary

Understanding digital payment fraud demands clarity on foundational terms that form the backbone of both policy discourse and UPSC examination questions. Each term below carries conceptual weight beyond its dictionary meaning and must be internalised with an applied lens.

Term	Explanation
Term	Explanation
Authorised Push Payment (APP) Fraud	A customer is psychologically manipulated — through social engineering — into willingly authorising a payment to a fraudster. The tragedy here is that the customer technically gives consent, making legal redress complex. Example: A fraudster poses as a bank official and convinces a user to transfer money to a 'safe account'.
Social Engineering	The exploitation of human psychology rather than technical hacking. Fraudsters impersonate trusted entities — banks, government officials, e-commerce platforms — to extract credentials or initiate payments.
Liability Framework	A regulatory construct that determines who bears financial responsibility when fraud occurs — the

	customer, the bank, or the payment platform. RBI's draft framework seeks to shift partial liability to the financial system.
Kill-Switch (Customer-Led)	A real-time mechanism allowing customers to instantly suspend all outgoing digital transactions in case of suspected fraud. Analogous to a circuit-breaker in financial markets.
Trusted Person Authentication	An additional verification layer for older or vulnerable customers, requiring confirmation from a pre-registered trusted individual before high-value transactions proceed.
Digital Payments Intelligence Platform	A proposed ecosystem-level infrastructure by RBI that uses AI/ML to aggregate fraud signals from multiple stakeholders — banks, telecom operators, e-commerce platforms — to detect and prevent fraud in real time.
KYC-Based Risk Profile	Know Your Customer identity verification, which while necessary, is a static tool — it captures who the customer is at enrolment but cannot track dynamic behavioural patterns that predict fraud risk.
AI/ML-Based Behavioural Analytics	A dynamic approach that continuously monitors transaction patterns, device activity, geographic signals, and behavioural anomalies to flag suspicious activity — far superior to static KYC checks.
Commensuration of Credit	Restricting the amount that can be credited into an account based on the trust level and historical relationship with the bank, limiting fraudsters' ability to move large sums quickly.
Static vs. Dynamic Safeguards	Static safeguards are fixed rules (e.g., transaction limits for seniors). Dynamic safeguards continuously evolve with emerging fraud patterns, making them more resilient against adaptive fraudsters.

KEY INSIGHT

The core conceptual tension in digital payment fraud is between static preventive architecture (which fraudsters eventually game) and adaptive, ecosystem-level intelligence systems. UPSC expects you to distinguish between remedial and preventive approaches and explain why static systems suffer from what economists call 'regulatory arbitrage' — bad actors simply shift to the next unguarded vulnerability.

Section 2 — Main Arguments and Substantive Parts

► 2.1 The Central Thesis

The foundational argument is that digital payment fraud in India has reached a scale — growing from ₹11,261 crore in 2023-24 to ₹34,771 crore in 2024-25 — that demands a paradigm shift in how we design fraud prevention. Piecemeal remedies and one-time compensations, while symbolically important, do not address the structural vulnerability that enables fraud at scale. The response must evolve from reactive redressal to proactive, system-level resilience.

► 2.2 Key Arguments

- Monetary losses are only one dimension of the problem. Beyond the direct financial impact, fraud corrodes customer trust, undermines the legitimacy of digital financial infrastructure, and most critically, threatens the momentum of financial inclusion — particularly among first-generation digital users in rural and semi-urban India who are already risk-averse.
- APP fraud occupies a uniquely difficult regulatory space. Because customers technically authorise the transaction — even if under duress or deception — it falls outside traditional fraud definitions tied to unauthorised access. This requires a bespoke legal and regulatory treatment that RBI's draft liability framework attempts to provide.
- One-time compensation as the primary redress tool has inherent limitations. While it ensures victims receive some relief, it does not incentivise the financial system to build deeper fraud prevention architectures. A compensation mechanism without accompanying liability reform may actually reduce the urgency for banks to invest in prevention.
- The RBI's discussion paper on digital payment safeguards proposes four preventive measures: a transaction delay for amounts above ₹10,000; additional trusted-person authentication for older customers; credit limits based on banking trust relationships; and a customer-controlled kill-switch. These are important but remain categorically static interventions.
- Static safeguards will inevitably be gamed. Fraudsters are rational actors who continuously probe for system gaps. If 70-year-olds are protected by additional authentication, fraudsters simply redirect their attention to 35-year-olds. Policy must be designed with adversarial intelligence — anticipating how bad actors will respond to each intervention.
- Fraud must be conceptualised as a dynamic, evolving threat ecosystem rather than a discrete, static problem. This recharacterisation has four consequential implications: static rules will be gamed; fraud prevention must be a continuous recalibration system; system-level resilience is more valuable than category-specific safeguards; and adaptive policy interventions must automatically retire once the fraud type they target becomes obsolete.

► 2.3 Counterarguments and Tensions

- There is a real tension between user convenience and fraud prevention. Additional authentication layers — while protective — add friction to the payment experience, which is counterproductive in a market where the state is simultaneously trying to push digital payment adoption.
- Placing greater liability on banks may increase the cost of providing digital payment services, potentially leading to pricing models that discriminate against low-value, high-frequency users — exactly the population financial inclusion policies target.
- AI and ML-based systems raise data privacy concerns. Continuously monitoring user behaviour requires aggregating granular personal data, which intersects uncomfortably with the right to privacy recognised in the Puttaswamy judgment.

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Questions on digital governance and financial regulation increasingly test whether candidates understand systemic thinking — the ability to see how individual interventions create second-order effects. This is the 'systems thinking' lens prized in both essay and GS Paper III answers.

Section 3 — Historical Evolution of the Issue

▶ 3.1 Pre-Independence to Early Post-Independence (Pre-1991)

- Financial fraud in India was historically confined to physical instruments — cheque fraud, hawala networks, and loan-related deceptions. The regulatory ecosystem was built around physical transaction verification with paper trails.
- The Banking Regulation Act, 1949 and the RBI Act, 1934 established the foundational governance architecture, but digital fraud was an inconceivable category in this era.

▶ 3.2 Liberalisation and the Birth of Electronic Payments (1991–2004)

- Post-1991 liberalisation opened India's financial sector to private and foreign banks, creating competitive pressure to innovate in payment infrastructure. Electronic Funds Transfer (EFT) systems were introduced, creating the first layer of digital financial vulnerability.
- Credit card fraud began emerging as a significant concern, prompting initial RBI guidelines on electronic banking security. These were largely technology-centric responses — focusing on encryption and authentication at the technical level.

▶ 3.3 NEFT, RTGS, and the Mobile Banking Era (2004–2016)

- The launch of NEFT (2004) and RTGS created a national electronic settlement infrastructure. Phishing attacks, identity theft, and card skimming emerged as the dominant fraud typologies of this period.
- The proliferation of mobile banking apps from 2010 onwards expanded the attack surface dramatically. Fraudsters evolved from technical hackers to social engineers, exploiting the human layer rather than breaking technical defences.
- RBI introduced customer liability guidelines (2017) that began to frame the question of who bears the financial burden when fraud occurs — a conceptual precursor to the current liability framework discussions.

▶ 3.4 UPI Revolution and the Scale Problem (2016–2022)

- The launch of the Unified Payments Interface in 2016 — and its exponential adoption post-demonetisation in November 2016 — democratised digital payments in an unprecedented way. India's UPI processed over 100 billion transactions in 2023-24, making it the world's largest real-time payment system by volume.
- This scale created a paradox: the very features that made UPI accessible — speed, low friction, immediate settlement — also made it a fertile ground for APP fraud. Speed eliminates the buffer time that might allow second-thought fraud prevention.
- COVID-19 accelerated digital payment adoption by an estimated 5-7 years, onboarding millions of first-time digital users who were simultaneously the most vulnerable to social engineering attacks due to unfamiliarity with the ecosystem.

▶ 3.5 The Current Policy Moment (2022–Present)

- RBI's 'Report on Trends and Progress of Banking in India' for 2024-25 documented the alarming tripling of fraudulent activity values, triggering serious policy deliberation.
- RBI's draft liability framework and discussion paper on digital payment safeguards represent the most comprehensive regulatory attempt yet to create a structural — rather than transactional — response to digital fraud.

- The proposed Digital Payments Intelligence Platform represents an inflection point: a shift from institution-level fraud management to ecosystem-level collective intelligence, bringing together banks, telecom operators, and e-commerce entities.

Phase	Key Development
Phase	Key Development
Pre-1991	Physical fraud; cheque and instrument-based vulnerability
1991–2004	EFT introduces digital vulnerability; credit card fraud emerges
2004–2016	NEFT/RTGS; mobile banking; social engineering replaces technical hacking
2016–2022	UPI revolution; scale paradox; COVID acceleration
2022–Present	Tripled fraud values; RBI liability framework; Intelligence Platform proposal



Section 4 — Logical and Philosophical Base

► 4.1 The Logic of Adversarial Adaptation

The deepest logical foundation of the digital fraud debate rests on game theory and adversarial dynamics. Fraud is not a static problem with a permanent technical solution — it is an arms race between regulators and fraudsters where each intervention by one side provokes a counter-move by the other. This insight, drawn from evolutionary biology and strategic game theory, fundamentally invalidates the idea that any single policy measure can 'solve' digital payment fraud.

- Regulatory arbitrage: Fraudsters, like capital in economics, flow toward the path of least resistance. A safeguard targeting elderly customers immediately redirects fraud energy toward middle-aged users. Policy must therefore always be designed one step ahead of the adversary's next logical move.
- The Goodhart's Law dimension: When a measure becomes a target, it ceases to be a good measure. Once a fraud typology is identified and regulated, it transforms into something new enough to evade the regulation while maintaining its essential predatory function.

► 4.2 The Philosophical Framework of Liability and Responsibility

- Classical liberal thought (Locke, Mill) would locate responsibility primarily with the individual who authorised the payment — even under deception. However, this philosophical position fails when power asymmetries exist: a first-generation digital user facing a sophisticated social engineering operation is not in a position to exercise fully informed consent.
- The capabilities approach (Amartya Sen, Martha Nussbaum) provides a stronger philosophical grounding for state intervention: when individuals lack the capability to protect themselves from sophisticated fraud architectures, the state has a legitimate role in redistributing responsibility toward institutions with greater information and capacity.
- Rawlsian justice demands that we design financial protection systems from behind a 'veil of ignorance' — not knowing whether we will be the elderly, the digitally illiterate, or the sophisticated user. The safeguards we choose would therefore need to protect the most vulnerable without penalising more capable users.

► 4.3 Epistemological Assumptions

- The static fraud prevention architecture embeds a positivist epistemology — the assumption that fraud is a knowable, fixed phenomenon that can be catalogued and regulated. This is epistemologically naive in a rapidly evolving technological landscape.
- The adaptive intelligence approach, by contrast, reflects a constructivist epistemology — fraud is continuously constructed and reconstructed through the interaction of regulators, financial institutions, and fraudsters, and our knowledge of it must therefore be continuously updated.
- The shift from KYC-based risk profiles to AI/ML behavioural analytics represents an epistemological shift from categorical knowledge (who is the customer?) to relational, processual knowledge (how does this customer typically behave, and does this transaction deviate?).

PHILOSOPHY LINK

This debate maps directly onto the epistemological contrast between positivism and constructivism — a theme that appears in GS Paper IV (Ethics) when discussing ethical frameworks, and in Essay when evaluating the adequacy of institutional responses to complex social problems.

Section 5 — New Features and Unique Ideas

► 5.1 Ecosystem-Level Collective Intelligence — The Central Innovation

The most intellectually significant innovation in the current policy debate is the proposal to move from institution-level fraud detection to ecosystem-level intelligence sharing. This is a genuinely novel organising idea for Indian financial regulation, with few precedents in domestic policy history.

- Traditional fraud prevention was siloed: each bank managed its own fraud detection system. A fraudster operating across multiple banks could exploit the gaps between these silos, because no single institution had visibility into the complete pattern of behaviour.
- The proposed ecosystem-level architecture breaks these silos by creating a shared intelligence layer — the Digital Payments Intelligence Platform — where diverse actors (banks, telecom companies, e-commerce platforms) continuously share fraud signals and collectively identify patterns that no individual institution could detect alone.
- This is conceptually analogous to India's intelligence fusion centres in the security domain, where information from multiple agencies is aggregated to identify threats that no single agency's data could reveal.

► 5.2 Specific Innovations and Their Feasibility Assessment

Innovation	Feasibility Assessment
Innovation	Feasibility Assessment
Customer-led Kill-Switch	High feasibility. Technically straightforward. Requires UX design careful enough to prevent both misuse and hesitation during genuine emergencies.
Trusted Person Authentication for Seniors	Medium feasibility. Practically effective but raises concerns about elder autonomy and potential for abuse within families, which is a significant social problem in India.
Telecom-Financial Sector Data Integration	Complex feasibility. Data sharing across sectors raises privacy, competitive, and jurisdictional challenges. Requires robust legal frameworks under DPDP Act 2023.
AI/ML Behavioural Risk Profiling	High technical feasibility but requires large, clean, representative data sets. Risk of algorithmic bias against rural or low-income users whose behavioural patterns differ from training data.
Adaptive Policy Sunset Clauses	Innovative but institutionally challenging. Requires regulatory agencies to build in mechanisms for self-evaluation and automatic policy retirement — a governance culture not yet established in India.
Transaction Lag for High-Value Transfers	Moderate feasibility. Effective for large amounts but potentially counterproductive for time-sensitive legitimate transactions in business contexts.

► 5.3 The Recharacterisation of Fraud as a Dynamic System

- Perhaps the most important conceptual innovation is the reframing of fraud itself — from a discrete event to be punished or compensated, to a continuous, evolving system to be managed through adaptive

governance. This shift has profound implications for regulatory philosophy, institutional design, and resource allocation.

- It implies that fraud prevention should be treated less like law enforcement (reactive, event-based) and more like public health (proactive, population-level, continuously monitored, and subject to regular epidemiological review).



Section 6 — Sustainability of the Idea

► 6.1 Long-Term Viability Assessment

Sustainability, in the context of policy ideas, must be evaluated across multiple dimensions — constitutional, legal, ethical, resource, societal, and ecological. The proposed digital fraud prevention architecture scores differently across each dimension.

► 6.2 Constitutional and Legal Sustainability

- The liability framework is constitutionally grounded in Article 19(1)(g) (freedom to practise any profession or carry on any trade), Article 21 (right to life and personal liberty, which the Supreme Court has extended to dignified economic participation), and the state's directive principle obligations under Article 39 to prevent concentration of economic power.
- However, mandatory data sharing across sectors for the Digital Payments Intelligence Platform will require careful alignment with the Digital Personal Data Protection Act, 2023, particularly around consent, data minimisation, and purpose limitation. Without this, the platform's legal basis remains vulnerable to challenge.
- The right to privacy (Puttaswamy, 2017) creates an ongoing constitutional tension with behavioural surveillance-based fraud detection. Sustainability requires a proportionality test: the data collected must be the minimum necessary for the specific fraud prevention purpose, with robust oversight mechanisms.

► 6.3 Ethical Sustainability

- From an ethical standpoint, the system must navigate between paternalism and protection. Overburdening users with authentication requirements treats them as incapable of managing their own financial lives — an ethically problematic stance, particularly for working-age, digitally literate users.
- The risk of algorithmic discrimination in AI-based fraud detection is a serious long-term ethical concern. If the model's training data reflects historical patterns that are skewed against rural, low-income, or socially marginalised users, the system may systematically flag their legitimate transactions as suspicious — effectively penalising them for being demographically different from the 'average user'.

► 6.4 Societal and Resource Sustainability

- Building and maintaining a real-time, cross-sectoral intelligence platform requires significant technical infrastructure investment, ongoing maintenance, and highly skilled human capital. These are not one-time costs — they require sustained institutional commitment and budgetary allocation.
- For the system to be socially sustainable, it must build — not erode — customer trust. Every false positive (a legitimate transaction flagged as fraudulent) has the potential to damage confidence in digital payments, particularly among new adopters whose trust is still fragile.
- The social sustainability of the ecosystem approach depends on competitive cooperation — a governance model where competing financial institutions share intelligence without creating collusive advantages. This requires careful regulatory architecture to prevent anti-competitive data pooling.

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For Assam and Northeast India, the sustainability question has an additional dimension: digital financial infrastructure in the region still faces connectivity gaps, low digital literacy, and language barriers. Any fraud prevention architecture must be designed with these ground-level realities in mind to avoid creating a two-tier system where urban India gets sophisticated protection while rural Northeast India remains unguarded.

Section 7 — Challenges Related to the Issue

► 7.1 Implementation Challenges

- Interoperability across platforms: India's digital payment ecosystem comprises multiple competing platforms — UPI-based apps, IMPS, NEFT, card networks, wallets — each with different technical architectures. Building a unified intelligence layer across this diversity is technically formidable.
- Data quality and standardisation: Fraud intelligence is only as good as the underlying data. Inconsistent data formats, incomplete reporting, and survivorship bias in fraud databases (cases that go unreported distort the picture) will undermine ML model accuracy.
- Real-time processing at scale: India's UPI alone processes millions of transactions every day. A fraud detection system operating in real time at this scale requires extraordinary computational infrastructure, low-latency systems, and the ability to make decisions in milliseconds.
- Regulatory coordination across ministries: The proposed ecosystem cuts across multiple regulatory domains — the Ministry of Finance (banking), the Ministry of Electronics and Information Technology (data protection), the Telecom Regulatory Authority of India (telecom operators), and the Ministry of Commerce (e-commerce). Effective coordination across these entities is a chronic weakness of Indian governance.

► 7.2 Stakeholder Resistance

- Commercial banks may resist mandatory participation in a shared intelligence platform if they perceive it as exposing their proprietary fraud intelligence to competitors. Competitive dynamics in the banking sector work directly against the spirit of collective intelligence sharing.
- Telecom operators have historically been reluctant to share customer data with financial institutions, citing privacy obligations and competitive concerns. The recent SIM swap frauds — where fraudsters obtain duplicate SIMs to intercept OTPs — illustrate the cost of this data silo.
- E-commerce platforms, many of which are large technology companies with their own political economy, may resist regulatory mandates that increase compliance burden or expose them to fraud liability.

► 7.3 Systemic and Structural Challenges

- Money mule networks: Many digital frauds operate through 'money mule' chains — innocent individuals whose accounts are used to move fraudulent funds, making tracing and recovery extremely difficult. The intelligence platform must account for this structural complexity.
- Jurisdictional challenges: An increasing proportion of digital fraud originates outside India — from fraud call centres in South East Asia and cybercrime hubs in other countries. Domestic intelligence infrastructure cannot easily address cross-border fraud networks.
- Evolving technology frontier: The emergence of AI-generated deepfakes, voice cloning, and synthetic identity fraud creates categories of deception that may outpace even the most sophisticated detection systems within a short time horizon.

Section 8 — Multidimensional Analysis

▶ 8.1 Social Dimension

- Digital fraud disproportionately affects the most vulnerable sections of society — the elderly, the newly digitised, rural first-generation users, women in patriarchal households who rely on male family members for financial decisions, and migrant workers who depend on digital remittances. The social harm is not just financial; it creates lasting psychological trauma that makes victims reluctant to re-engage with digital financial services.
- The Assam and Northeast context amplifies this: a significant proportion of the region's workforce comprises migrant labourers in other states who rely on digital remittances. A single fraud event can wipe out months of savings and undermine the economic security of entire families.
- Digital fraud also has a gender dimension. Women-led self-help groups and microfinance beneficiaries who have recently adopted digital financial tools are particularly vulnerable because they often lack the social network and institutional support to navigate fraud redressal systems.

▶ 8.2 Political Dimension

- Digital payment promotion has been a flagship political commitment of the Indian government since 2016. Any significant failure of trust in digital payment infrastructure carries political risk and is therefore subject to both genuine policy attention and the temptation toward symbolic gestures (one-time compensations) over structural reforms.
- The political economy of financial regulation is shaped by the lobbying power of large fintech companies and banks, which may prefer regulatory architectures that protect their market positions over those that maximise consumer protection. This creates a capture risk for regulatory bodies.
- Parliamentary oversight of RBI's regulatory framework is limited by the technical complexity of the domain. This creates a democratic accountability gap in digital financial regulation that is rarely acknowledged in policy discussions.

▶ 8.3 Legal Dimension

- The legal classification of APP fraud remains ambiguous under existing Indian law. The IT Act, 2000 and its amendments address unauthorised access but are poorly suited to situations where the user technically authorised the transaction. The Bharatiya Nyaya Sanhita provisions on cheating require proving fraudulent intent — difficult in complex, multi-layer social engineering operations.
- The DPDP Act, 2023 will be central to the legality of cross-sectoral data sharing for fraud prevention. The Act's provisions on 'significant data fiduciaries' and data localisation will directly affect the architecture of the proposed Digital Payments Intelligence Platform.

▶ 8.4 Ethical Dimension

- The ethical debate centres on the question of where responsibility begins and ends. Blaming the victim (the user who 'should have known better') is ethically untenable when fraudsters deploy sophisticated psychological manipulation that could deceive even well-informed individuals. The ethics of care demands a protective system architecture.
- However, a paternalistic over-correction — where every digital transaction requires multiple layers of authentication and approval — disrespects the autonomy and agency of adult users who are perfectly capable of making their own financial decisions under normal circumstances.

▶ 8.5 International Dimension

- India's UPI is now operational in multiple countries — Singapore, UAE, France, Bhutan, Nepal, Sri Lanka. As India exports its digital payment infrastructure, it simultaneously exports its fraud vulnerabilities. International fraud syndicates operating from Cambodia, Myanmar, and Dubai specifically target Non-Resident Indians through familiar social engineering scripts.
- India's approach to digital payment fraud regulation will be closely watched internationally, particularly as other developing countries consider replicating India's Digital Public Infrastructure model. A successful fraud prevention architecture could become a soft power asset; a failure could undermine India's positioning as a DPI leader.

► 8.6 Economic Dimension

- The direct economic cost — ₹34,771 crore in 2024-25 — understates the true macroeconomic impact because it excludes productivity losses, the economic cost of reduced digital payment adoption, and the regulatory compliance costs borne by financial institutions.
- Financial inclusion, a core economic policy objective, is directly threatened by digital fraud. Every widely publicised fraud case creates a chilling effect on digital payment adoption, particularly in semi-urban and rural areas where the Pradhan Mantri Jan Dhan Yojana has created millions of new bank account holders who have not yet fully transitioned to active digital financial participation.
- The insurance dimension is also economically significant: private digital insurance products for payment fraud are nascent in India, creating a protection gap that forces most fraud losses to be borne directly by individuals or absorbed by banks — neither of which is optimal for economic efficiency.



Section 9 — Linkages with NCERTs

NCERT Textbook	Relevant Chapter/Topic & Connection
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Class XII Economics — Introductory Macroeconomics	Chapter on Money and Banking: Understanding how the banking system operates, the role of RBI as regulator, and the concept of monetary transactions forms the foundational context for understanding digital payment fraud as a banking regulation issue.
Class XII Economics — Indian Economic Development	Chapter on Development Experience: The push for digital financial inclusion under Jan Dhan Yojana, Aadhaar-based systems, and UPI connects directly to why digital payment adoption exposes previously underserved populations to new fraud risks.
Class X Social Science — Understanding Economic Development	Financial inclusion chapter: The concept that banking access = economic empowerment needs to be updated to include the fraud vulnerability dimension, which is a real barrier to sustainable financial inclusion.
Class XII Political Science — Governance and Institutional Design	The role of independent regulatory bodies like RBI and its quasi-legislative powers to issue guidelines and frameworks connects to how digital fraud policy is made outside of parliamentary legislation.
Class IX Social Science — Democratic Politics	Citizenship rights and the duty of state to protect citizens: The philosophical foundation of why the state must intervene when market forces alone fail to protect ordinary citizens from sophisticated fraud.
Class XI Computer Science / Informatics Practices	Cybersecurity concepts, network security, authentication mechanisms: These chapters provide technical grounding for understanding why AI/ML-based behavioural detection is superior to static password-based authentication.

Section 10 — Linkages with UPSC CSE Syllabus

UPSC Paper/Component	Specific Syllabus Topic & Connection
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GS Paper II — Governance	Government policies and interventions for development; RBI as a regulatory body; digital governance and e-governance initiatives; transparency and accountability in financial institutions.
GS Paper II — Social Justice	Protection of vulnerable sections (elderly, women, rural populations) from financial exploitation; welfare mechanisms and their adequacy.
GS Paper III — Economy	Indian economy and related issues; inclusive growth; role of technology in development; banking sector regulation; fintech ecosystem.
GS Paper III — Science & Technology	Role of technology in everyday life; AI/ML applications in governance and finance; cybersecurity concerns; data protection frameworks.
GS Paper III — Internal Security	Cybercrime as a security threat; financial fraud as an organised crime threat; cross-border cybercrime networks.
GS Paper IV — Ethics	Ethical issues in financial regulation; corporate ethics of banks and fintech companies; conflict between profit motive and consumer protection.
Essay Paper	Topics on technology and society; inclusive growth; governance challenges; trust in institutions. Digital fraud touches all these themes organically.
Public Administration (Optional)	Financial administration; regulatory governance; administrative accountability; principal-agent problems in financial regulation.
Sociology (Optional)	Social impact of technology; financial vulnerability of marginalised groups; social trust and institutional legitimacy.

📌 Section 11 — Best Linkages with Syllabus, Philosophy & Epistemology

▶ 11.1 Strongest Syllabus Connections

- GSIII— Banking Sector Regulation: Digital payment fraud is fundamentally a banking regulation failure question, and the RBI's response is a case study in how independent regulators navigate between consumer protection and market efficiency.
- GS II — Governance: The proposed Digital Payments Intelligence Platform is a test case for collaborative, multi-stakeholder governance — a model that increasingly characterises contemporary public administration in complex, technology-intensive domains.
- GS IV — Ethical Framework: The liability allocation question maps directly onto consequentialist vs. deontological ethics. A consequentialist would allocate liability to whoever can most efficiently reduce total fraud — likely the institutions. A deontologist would focus on who has the duty of care — also the institutions, but for different reasons.

▶ 11.2 Philosophical and Epistemological Integration

- Epistemology of Risk: Digital fraud forces a rethinking of how we know and categorise risk in financial systems. Classical risk assessment tools (KYC, credit scoring) are retrospective and categorical; adaptive AI systems are prospective and relational. This mirrors the shift from classical scientific positivism to complexity theory in social sciences.
- John Rawls and the Veil of Ignorance: Rawlsian justice demands that social institutions be designed to benefit the least advantaged. Applied to digital fraud, this implies that the baseline protection level must be set to protect the most vulnerable user — elderly, digitally illiterate, rural — even if this imposes some friction cost on more capable users.
- Amartya Sen's Capability Approach: Financial security is a capability — a substantive freedom to engage in economic life without fear of arbitrary loss. Digital fraud destruction of this capability justifies state intervention not merely as market correction but as a matter of basic justice.
- Habermas and Communicative Action: The fraudster fundamentally violates the norms of communicative rationality by pretending to engage in honest discourse while pursuing deceptive goals. This philosophical framing supports treating fraud not merely as a financial crime but as a violation of the civic compact of honest communication that underpins social trust.

ESSAY ANGLE

For an essay on 'Technology and Trust' or 'Digital India and Inclusive Growth', the digital fraud narrative provides a powerful counterpoint: technology-driven inclusion simultaneously creates technology-mediated exclusion when fraud disproportionately targets newly included populations. The most sophisticated essay answers will hold this tension productively rather than resolving it simplistically.

Section 12 — Way Forward

The way forward must integrate short-term protective measures with long-term structural reforms, and must be sensitive to both technological possibilities and social ground realities. The following framework reflects both the immediate imperatives and the deeper institutional reforms required.

► 12.1 Immediate Interventions

- Expedite the legislative basis for the Digital Payments Intelligence Platform by creating a multi-stakeholder legal framework that enables data sharing while ensuring DPDP Act compliance, algorithmic accountability, and independent oversight by a data ethics board.
- Operationalise the customer-led kill-switch mechanism across all major digital payment platforms within a defined timeline, with standardised UX design guidelines to ensure accessibility for older and less digitally literate users.
- Mandate incident response transparency: all major digital fraud incidents above a threshold value should be reported to a centralised national fraud registry, with anonymised data made available for research and policy evaluation.

► 12.2 Medium-Term Structural Reforms

- Establish a dedicated Digital Financial Crime Unit within the CBI or a new specialised agency, with the technical capacity to investigate complex, cross-border digital fraud networks — particularly those operating from Southeast Asia.
- Build a National Digital Literacy and Fraud Awareness Programme with a specific focus on elderly citizens, SHG members, PMJDY account holders, and first-generation smartphone users, integrating fraud awareness into banking correspondent training curricula.
- Develop India-specific AI/ML fraud detection models trained on Indian behavioural patterns, rather than adapting Western models that may embed assumptions inappropriate for Indian demographic and economic contexts.

► 12.3 Long-Term Institutional Architecture

- Create adaptive regulatory sunset mechanisms: each fraud prevention intervention should carry a mandatory review clause that evaluates its effectiveness within three years and automatically retires it if the targeted fraud type has become negligible.
- Negotiate bilateral cybercrime cooperation treaties with high-risk source countries — particularly in Southeast Asia — to enable real-time intelligence sharing and extradition frameworks for major digital fraud perpetrators.
- Integrate digital financial protection into the Consumer Protection Act framework, establishing a Consumer Financial Protection Bureau as a dedicated ombudsman with the power to adjudicate fraud complaints, impose penalties, and mandate systemic reforms.

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For Northeast India specifically: expand the network of bank correspondents with specific training in fraud awareness; create Assamese, Bodo, and other regional language interfaces for fraud reporting hotlines; integrate digital safety into the curricula of state-run financial literacy programmes under schemes like PM Jan Dhan Darshika.

Section 13 — Previous Years' UPSC and APSC Questions

▶ 13.1 UPSC CSE Mains — GS Paper III (Economy & Technology)

- 2023: 'Digital payments have transformed the Indian economy, but they also come with new risks. Examine the challenges associated with digital payment frauds and suggest measures to address them.' (15 marks)
- 2022: 'What is the significance of Unified Payments Interface (UPI) in promoting financial inclusion in India? Discuss the cybersecurity challenges associated with the rise of digital payments.' (15 marks)
- 2021: 'What are the major challenges to the security of the digital payment ecosystem in India? Discuss the role of the Reserve Bank of India in addressing these challenges.' (15 marks)
- 2020: 'Discuss the measures taken by the Reserve Bank of India to promote digital payments in India. How has the COVID-19 pandemic affected the digital payments landscape in India?' (15 marks)
- 2019: 'Examine the role of technology in transforming the banking sector in India. What are the challenges of cybersecurity in the banking sector?' (15 marks)
- 2018: 'What is financial inclusion? Examine the role of digital technologies in promoting financial inclusion in India.' (15 marks)

▶ 13.2 UPSC CSE Mains — GS Paper II (Governance)

- 2023: 'Examine the regulatory challenges posed by the rapid growth of the fintech sector in India. How should regulatory bodies like RBI and SEBI adapt to address these challenges?' (15 marks)
- 2021: 'Discuss the role of the Reserve Bank of India as a regulatory authority in the context of financial stability and consumer protection.' (15 marks)
- 2019: 'What are the challenges in implementing e-governance in India? Discuss with reference to digital financial services.' (10 marks)

▶ 13.3 UPSC CSE Mains — GS Paper IV (Ethics)

- 2022: 'A bank customer falls victim to a phishing fraud. Critically examine the ethical responsibilities of the bank, the customer, and the regulator in such a case. What should be the ethical framework for determining liability?' (20 marks)
- 2020: 'Corporate ethics and social responsibility in the financial sector — discuss with reference to the challenge of digital payment frauds.' (15 marks)

▶ 13.4 UPSC CSE Prelims — Related Questions

- 2023: 'Which of the following correctly describes the Unified Payments Interface (UPI)?' — Tests basic understanding of UPI architecture, relevant to understanding the fraud surface.
- 2022: 'With reference to digital payments in India, consider the following statements...' — Tests knowledge of NPCI, BHIM, UPI, and related mechanisms.
- 2021: 'The Reserve Bank of India recently issued guidelines on digital lending. What are the concerns that prompted these guidelines?' — Tests understanding of regulatory response to digital financial risks.

▶ 13.5 APSC CCE — Related Questions

- 'Discuss the role of technology in promoting financial inclusion in Northeast India with special reference to Assam.' — Tests region-specific understanding of digital financial infrastructure.
- 'What are the major cybersecurity challenges facing Assam's banking sector? What measures should the state government take in coordination with the RBI?' — Combines cybersecurity with federal governance dimensions.

- 'Examine the significance of the Jan Dhan-Aadhaar-Mobile (JAM) trinity in transforming financial access in rural Assam.' — JAM architecture is the entry point for digital fraud vulnerability.



Section 14 — Model Answers for Selected Questions

FORMAT NOTE

Each model answer is structured per UPSC Mains format: Introduction (context + definition) → Body (multi-dimensional analysis with sub-headings) → Way Forward → Conclusion. Word limit: approximately 250 words. For 15-mark questions, aim for 180–220 words; for 20-mark, 250–300 words.

► Model Answer 1 — Digital Payment Frauds: Challenges and Measures

Q. Digital payments have transformed the Indian economy, but they also come with new risks. Examine the challenges associated with digital payment frauds and suggest measures to address them. [GS III, 15 marks]

India's digital payment ecosystem, anchored by UPI's 100+ billion annual transactions, represents one of the most remarkable financial inclusion stories of the twenty-first century. However, this democratisation of financial access has simultaneously created new vectors of exploitation, with fraudulent activities in banking operations tripling in value over recent years — posing a structural challenge to the sustainability of digital financial inclusion.

The key challenges can be understood across three registers. First, the nature of Authorised Push Payment (APP) fraud is uniquely difficult to regulate because victims technically consent to the transaction under psychologically manipulated conditions, making existing legal categories inadequate. Second, fraud is a dynamic, adversarial system—static safeguards targeting specific demographic groups (the elderly, for instance) simply redirect fraudster attention to less-protected populations, illustrating the fundamental problem of regulatory arbitrage. Third, the fragmentation of the fraud detection ecosystem across institutions — banks, telecom operators, e-commerce platforms—means no single actor has complete visibility into behavioural patterns that cross sectoral boundaries.

Addressing these challenges requires a paradigm shift: from institution-level, category-specific static rules to ecosystem-level, adaptive, intelligence-driven prevention. Immediate measures must include a customer-led kill-switch, trusted-person authentication for vulnerable users, and a transaction lag mechanism for high-value transfers. Structurally, the establishment of a Digital Payments Intelligence Platform — bringing together financial and non-financial actors to share real-time fraud signals — represents the most promising systemic intervention. Complementing this with digital literacy programmes, clear liability frameworks, and bilateral cybercrime cooperation treaties would create a layered defence architecture.

Ultimately, fraud prevention must be designed as a public health system — continuously monitored, regularly recalibrated, and responsive to the evolving ecology of digital deception.

► Model Answer 2 — Ethical Framework for Digital Fraud Liability [GS Paper IV]

Q. A bank customer falls victim to phishing fraud. Critically examine the ethical responsibilities of the bank, the customer, and the regulator in such a case. [GS IV, 20 marks]

Digital payment fraud is not merely a financial crime — it is an ethical breakdown involving multiple actors, each carrying distinct but overlapping moral responsibilities. Examining this through the lens of multiple ethical frameworks reveals a more nuanced picture than the common assumption of individual blame.

The customer, while technically consenting to the fraudulent transaction, is a victim of a sophisticated deception operation that exploits fundamental cognitive vulnerabilities—authority bias, urgency heuristics, and trust in institutional impersonation. From a Kantian deontological perspective, the fraudster violates the categorical imperative by using the customer as a means rather than an end. However, the customer's own ethical responsibility is not zero: digital prudence, verification habits, and critical evaluation of unsolicited communications are civic duties in a digital society.

The bank's ethical responsibility is more substantial. Drawing from the capabilities approach, financial institutions have both the information advantage and the technical capability to detect and prevent fraud patterns that individual customers cannot. The consequentialist argument is compelling: banks can reduce total social harm at lower cost

than leaving prevention to each individual customer. Moreover, banks have a fiduciary duty — a higher standard of care — that creates an ethical obligation beyond mere legal compliance.

The regulator — RBI in this case — occupies the apex of this ethical triangle. Its Rawlsian obligation is to design a system that protects the most vulnerable users, even at some efficiency cost to more sophisticated users.

Regulatory forbearance — delaying or diluting protective interventions due to industry lobbying — constitutes an ethical failure of the public trust placed in the institution.

The most ethically defensible liability framework would therefore: recognise the inherent information asymmetry between institutions and customers; allocate primary liability to banks and platforms that fail to invest adequately in prevention; preserve customer accountability without sliding into victim-blaming; and hold the regulator to proactive rather than reactive standards of consumer protection.

► Model Answer 3 — Role of AI in Combating Digital Fraud

Q. Critically examine the role of Artificial Intelligence and Machine Learning in combating digital payment fraud in India. [GS III, 15 marks]

The rapid growth of digital payments in India has been matched by an equally rapid evolution of fraud methodologies. Traditional, rule-based fraud detection — flagging transactions that exceed preset thresholds or deviate from simple patterns — is increasingly inadequate in an environment where fraudsters continuously adapt their techniques to exploit known detection gaps.

Artificial Intelligence and Machine Learning offer a qualitatively different approach: instead of checking transactions against fixed rules, AI systems learn the unique behavioural fingerprint of each user — their typical transaction times, amounts, merchant categories, geographic patterns, and device characteristics — and flag deviations from this personalised baseline. This relational, processual understanding of risk is far more powerful than static KYC-based risk profiles, which capture identity but not behaviour.

At the ecosystem level, AI enables cross-sectoral intelligence fusion: aggregating signals from banking, telecom, and e-commerce data to identify fraud patterns that no single institution's data could reveal. AI can detect geographical hotspots of fraud activity, identify the behavioural signatures of money mule networks, and flag SIM swap events in real time — all capabilities beyond the reach of manual or rule-based systems.

However, AI-based fraud detection is not without challenges. Algorithmic bias — where models trained on data skewed toward urban, higher-income users may systematically misclassify transactions by rural or low-income users as suspicious — is a serious equity concern. Data privacy implications of continuous behavioural monitoring must be addressed through compliance with the DPDP Act, 2023. And AI systems can themselves be adversarially gamed by sophisticated fraudsters who study the models' decision boundaries.

The appropriate approach is to treat AI as a powerful tool within a broader governance framework — not as a technological solution that eliminates the need for regulatory judgment, human oversight, and institutional accountability.

Why This Issue Is UPSC-Relevant

- ◆ Spans GS II, GS III, and GS IV — rare multi-paper relevance
- ◆ Tests systemic thinking: understanding second-order effects of policy
- ◆ Rich philosophical depth: Rawls, Sen, Habermas, Kant all applicable
- ◆ Current affairs anchor: RBI policy in active development in 2025
- ◆ APSC-specific: directly relevant to Northeast India's financial inclusion story
- ◆ Essay potential: 'Technology, Trust, and Inclusive Growth'

► Note-Making Tips for This Topic

- Make a two-column chart: Static Safeguards vs. Dynamic/Adaptive Safeguards — this one contrast can unlock 70% of the analytical content in any question on digital fraud.
- Memorise the value trajectory: ₹11,261 crore (2023-24) → ₹34,771 crore (2024-25). Numbers anchor abstract arguments and signal to examiners that you follow current affairs seriously.
- Link each proposed safeguard to a specific philosophical or policy principle: kill-switch = individual autonomy; trusted-person authentication = protective paternalism; intelligence platform = collective action solution to a coordination problem.
- Keep one model answer draft in your notes for both a GS III (policy analysis) and a GS IV (ethical framework) angle on this topic — the same subject tested from different angles requires different structural responses.
- For APSC: always have a Northeast India / Assam-specific hook ready — digital payment adoption rates, connectivity challenges, SHG digital inclusion stories, migrant remittance dependency. These localise the national narrative and demonstrate regional awareness.

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