



How a Suitability Consultant Assures the Robustness of Your Advice

In a regulatory environment defined by increasing scrutiny, shifting expectations, and the full implementation of the FCA's Consumer Duty, the need for structured, evidentiary assurance in financial advice has never been higher. Gone are the days when quality control could be retrofitted post-advice. Today, advice must be demonstrably aligned to client needs, regulatory standards, and firm-level governance frameworks from the outset.

Why Advice QA Isn't Enough

Traditional Quality Assurance (QA) is inherently backward facing. It checks if the advice might hold up, but only after it's been issued. While essential, QA on its own cannot deliver confidence in process integrity, logic discipline, or evidentiary traceability. This reactive posture exposes firms to internal governance weaknesses, regulatory exposure, and consumer harm.

What's now required is forward-looking assurance: embedded in the construction of advice, evidenced by logic, and reviewable at every stage. This is the role of the Suitability Consultant.

The Role of the Suitability Consultant

Where paraplanners traditionally construct reports based on adviser input, Suitability Consultants shape, test, and evidence the advice itself. A Suitability Consultant begins before that, often influencing the recommendations before they reach the report stage. Our consultants structure the advice journey, challenge inputs, validate logic, and produce reports that are not just accurate, but evidenced.

At We Complement, we still write suitability reports. But the methodology, standards, and logic pathways we now embed mean the role has outgrown its traditional boundaries. This evolution isn't about titles. It's about responsibility.

A Suitability Consultant is not a rebranded paraplanner. They are regulatory infrastructure in human form. Forensic, technically skilled, and standards-led, they operate at the intersection of advice quality, governance design, and evidence construction.

They ensure that every recommendation, rationale, and report stands up not just to internal scrutiny, but to third-party audit and FCA review. Their work replaces subjective interpretation with repeatable logic.

Their discipline is aligned to:

- PS22/9 – Consumer Duty
- PROD – Product Governance
- SYSC – Senior Management Systems & Controls
- COBS – Conduct of Business Sourcebook
- PRIN – Principles for Businesses
- TCF – Treating Customers Fairly

Structured Systems of Assurance

What elevates the Suitability Consultant's role is the structured system they use to build evidentiary confidence. These are not tools, they are professional disciplines embedded in repeatable process.

ARC (Advice Readiness Checks)

A structured pre-advice process using versioned questionnaires to surface gaps in factfinding, objectives, risk profiling, and client context. ARC provides the foundation of confidence before advice is generated.

ASL (Advice Suitability Logic)

A regulatory logic engine in human form. Consultants assess each case against 130+ FCA-derived rules to test alignment, coherence, and consumer outcome fit. ASL is the scaffolding that ensures advice integrity.

Suitability Matrix Score (SMS)

Each case concludes with a structured Suitability Matrix Score; a multi-dimensional evidencing report that includes logic grading, risk flagging, and improvement guidance. It is version-controlled, repeatable, and directly mapped to FCA expectations.

Before and After: A Use Case

Before: Paraplanners rely on firm templates, building justification backwards from a product decision. QA happens days later, sometimes post-submission.

After: Suitability Consultants begin with ARC to structure factfinding, apply ASL as they write, and produce a report graded by SMS. QA becomes a formality; the advice is already aligned.

What a Suitability Consultant Delivers to Your Firm

Evidentiary Assurance

Advice is no longer just well-constructed it is evidentially justified and logic backed.

Audit Readiness

Consultants build files that meet internal and external scrutiny standards, pre-empting FCA or PI insurer queries.

Risk Mitigation

Errors, inconsistencies, and logic gaps are caught before the advice is submitted, reducing exposure and rework.

Governance Integration

They act as telemetry within the advice process, spotting override patterns, recommendation drift, and risk layering.

Process Discipline

Suitability Consultants embed versioned standards and remove ambiguity. They don't chase quality; they structure it.

Client Outcome Validation

Every recommendation is tested against the actual, declared objectives and risk appetite of the client, not just assumed suitability.

A Catalyst for Senior Management Assurance

Under the SM&CR regime, senior leaders are accountable for the processes underpinning advice. Suitability Consultants provide assurance that logic standards are being applied, tracked, and evidenced consistently. Their presence supports defensible delegation, governance audits, and cultural consistency across adviser teams.

Scalable, Future-Proofed Assurance

Suitability Consultants aren't just valuable now; they are scalable infrastructure for the future. As advice processes become more regulated, more digitised, and more scrutinised, the consultants already operating with logic-based standards will evolve into system supervisors. They are the human equivalent of an advice assurance engine, versioned, mapped, and embedded.

The Emerging Standard

The Suitability Consultant is not just a role; it's a strategic capability. Firms investing in this talent aren't just improving quality they are future-proofing how advice gets constructed, evidenced, and approved.

This is how advice becomes robust, auditable, and confidently defensible. Not as art, but as assurance.

For more information on suitability assurance models or support with implementing these standards across your firm, please contact the We Complement team.

