



Audit-Proof: Why Real-Time Suitability Scoring Beats Retrospective Monitoring

Embedding Confidence. Elevating Standards.



We've published this paper not to sell a tool but to define a direction. It formalises the logic behind our suitability consultant training and sets regulatory and behavioural clarity as the gold standard.

The scoring systems referenced, AMS, ARC, and ALS, are currently in phased build, and our suitability consultants are undergoing 12 weeks of deep training in how to operate them effectively.

The MVP platform layer will go live in December 2025. From January to March 2026, we'll run founding advisory cohort pilots using real files, real QA, and real AMS scoring.

If you're interested in being part of that cohort, or trialling parts of the consultant process beforehand, now is exactly the right time to talk.

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Executive Summary

Retrospective monitoring no longer satisfies regulators, insurers, or clients. Review cycles based on reactive QA and subjective file scoring fall short of evidencing suitability, consistency, or behaviour change.

This paper introduces a proactive framework built around real-time assurance logic and the emerging role of Suitability Consultants; regulatory-aligned experts who validate advice integrity before risk crystallises.

Firms still 'checking files' are exposed. Leadership teams must act decisively. If you are not audit-ready. You are audit vulnerable.

The message to CEOs, CCOs, and Heads of Advice is clear: If you cannot prove how advice logic aligns to client needs and FCA rules in real time, your systems aren't controlling advice risk, they're just observing it after the fact.

This Isn't About Systems. It's About Structure.

"The moment you're editing logic after submission, you're not evidencing advice, you're patching risk."

The financial planning profession has relied too long on retrospective compliance.

Spot-checking files weeks after submission. Paper trails assembled reactively. Subjective file scoring systems based more on familiarity than framework. That era is over.

Audit-proof is not a buzzword. It is a design principle. And real-time suitability scoring is the mechanism to achieve it, *when embedded into the advice process by the right people, for the right reasons.*

This document is not about technology. It is about structure. The future of advice assurance isn't tech-led, it's behaviour-led

The Problem with Retrospective Monitoring

Retrospective reviews suffer from three fatal flaws:



Lag

Files are checked
too late to
prevent client harm



Subjectivity

Reviewer
interpretations
vary wildly



Blind Spots

Systemic
behavioural drift
goes undetected

**“Retrospective QA rewards file
repair – not risk prevention.”**

Worse still, they reward file repair culture. Instead of surfacing weak logic or misaligned objectives, they incentivise cosmetic edits. Errors are patched, but behaviours persist.

The FCA expects advice to be suitable the first time. Not after three rounds of QA.

Key Regulatory Anchors:

- **COBS 9.2.1R – Client suitability:** A firm must take reasonable steps to ensure suitability.
- **SYSC 3.2.6R – Risk systems and governance:** A firm must ensure that its systems enable compliance with applicable rules.
- **PS22/9 – Consumer Duty alignment:** Firms must act to deliver good outcomes, not just avoid foreseeable harm.

Enter the Suitability Consultant

"We're not just checking advice. We're structuring defensibility"

A Suitability Consultant is not a new name for a paraplanner. They are the forensic custodians of regulatory alignment.

Their role is to:

- Evidence recommendation logic against defined frameworks.
- Enforce consistency of standards across advisers and files.
- Eliminate variance in judgement using structured rulesets.

Each file is reviewed *before* risk is crystallised. Using the Authara™ Assurance Matrix Score (AMS), allowing suitability consultants to surface real-time red flags.

This is what "audit-proof" means: not that a file is tidy, but that it is defensible.

FCA Expectation	Real-Time Check	Consultant Role
COBS 9.2.2R (Assess suitability based on client circumstances)	ARC mismatch triggers based on objectives	Validate advice inputs against client fact pattern
PROD 1.3.6R (Product must be compatible with client needs)	AMS flags unsuitable product combinations	Test product logic against client outcome path
SYSC 4.1.1R (Appropriate risk controls must be embedded)	Override logs recorded and analysed monthly	Enforce governance discipline around judgment calls
PS22/9 (Demonstrating good outcomes)	Time to QA, SMS variance, red flag resolution rates	Use dashboards to drive behaviour change, not just documentation

Behavioural Risk Reduction

The real revolution isn't technology. It's visibility.

AMS enables consultants to provide metrics that shift behaviour:

Behavioural Risk	Real-Time Proxy	Source
Over-recommendation bias	% of red flags by product	AMS engine
Risk drift	Overrides per adviser/month	Override logs
Misaligned objectives	ARC trigger rates	ARC engine
QA reactivity	Time to final version	Internal QA timestamps
CPD relevance	Risk resolution after CPD	LMS (v2)

As behavioural data becomes visible, advice culture evolves. Feedback loops become daily practice, not quarterly panic. Advisers know when they're drifting. Team leaders know where coaching matters. Suitability becomes embedded. As patterns emerge, coaching becomes targeted, and advice evolves from reactive correction to proactive precision.

Behaviour becomes visible ➡ *Coaching becomes targeted*
*Advice becomes **precise**.*

Insurance Implications. Reducing the Cost of Risk

By structuring suitability into a repeatable, traceable, and override-accountable process, the business becomes measurably lower risk.



Stronger
claims defence



Fewer rogue
events



Better
disclosure

We don't check advice.
We evidence it.

- ✓ Traceable
- ✓ Versioned
- ✓ Justified
- ✓ Override-documented
- ✓ Objective-aligned

By the time a file hits QA, most of the compliance work is already done. The AMS score is embedded. The logic pathway is structured. And the audit trail already exists.

We don't check advice. We evidence it.

Practical Adoption

The Audit-Proof model is already live in our Suitability Consultant deployment. Clients adopting this approach receive:

- Live AMS scoring across all files
- Consultant-led override interrogation
- Governance-ready MI dashboards
- Adviser and team scoring analytics
- Monthly RCA reporting

This isn't a replacement for your compliance team. It is a system for turning behavioural ambiguity into regulatory clarity and insurance confidence. The model integrates alongside your current advice and compliance workflows, without requiring wholesale system change.

Conclusion: Designed for Audit. Built for Advice.

The FCA does not ask for perfection. But it does ask for intention, structure, and defensibility.

That is what audit-proof means. That is what the Suitability Consultant role delivers. And that is what real-time scoring finally enables.

Do your advisers know their override rate?

Can you prove advice logic alignment without explanation?

Are you confident you'll defend your next FCA file review?

If your QA process still starts at the end of the advice process, you are not audit-proof. You are audit vulnerable. Let's fix that.

To explore strategic partnerships or deployment in your firm, contact me directly: tbs@wecomplement.co.uk

Ready to build audit-proof advice processes?

Let's explore how real-time suitability scoring could work inside your firm.

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