



Built to Prove It:

Operationalising Advice Integrity

How firms evidence suitability in practice.

Firms are no longer judged on how quickly they can defend their advice after the fact, but on how effortlessly they can prove it from the outset. Retrospective checks, sampling reviews, and narrative-based defences fail to deliver certainty. They drain resources without restoring trust.

Suitability is not broken in reports, it is broken in the logic chain. The answer is Advice Integrity, proven and evidenced in real time through a system that cannot be bypassed. This paper sets out how firms operationalise Advice Integrity using the Five Steps framework, creating audit-proof advice as standard.

From Plausible Logic to Proven Advice

For too long, advice has relied on plausible narratives. Reports are constructed to explain, not to prove. Compliance teams then review files retrospectively, scoring them against subjective standards, often months after delivery.

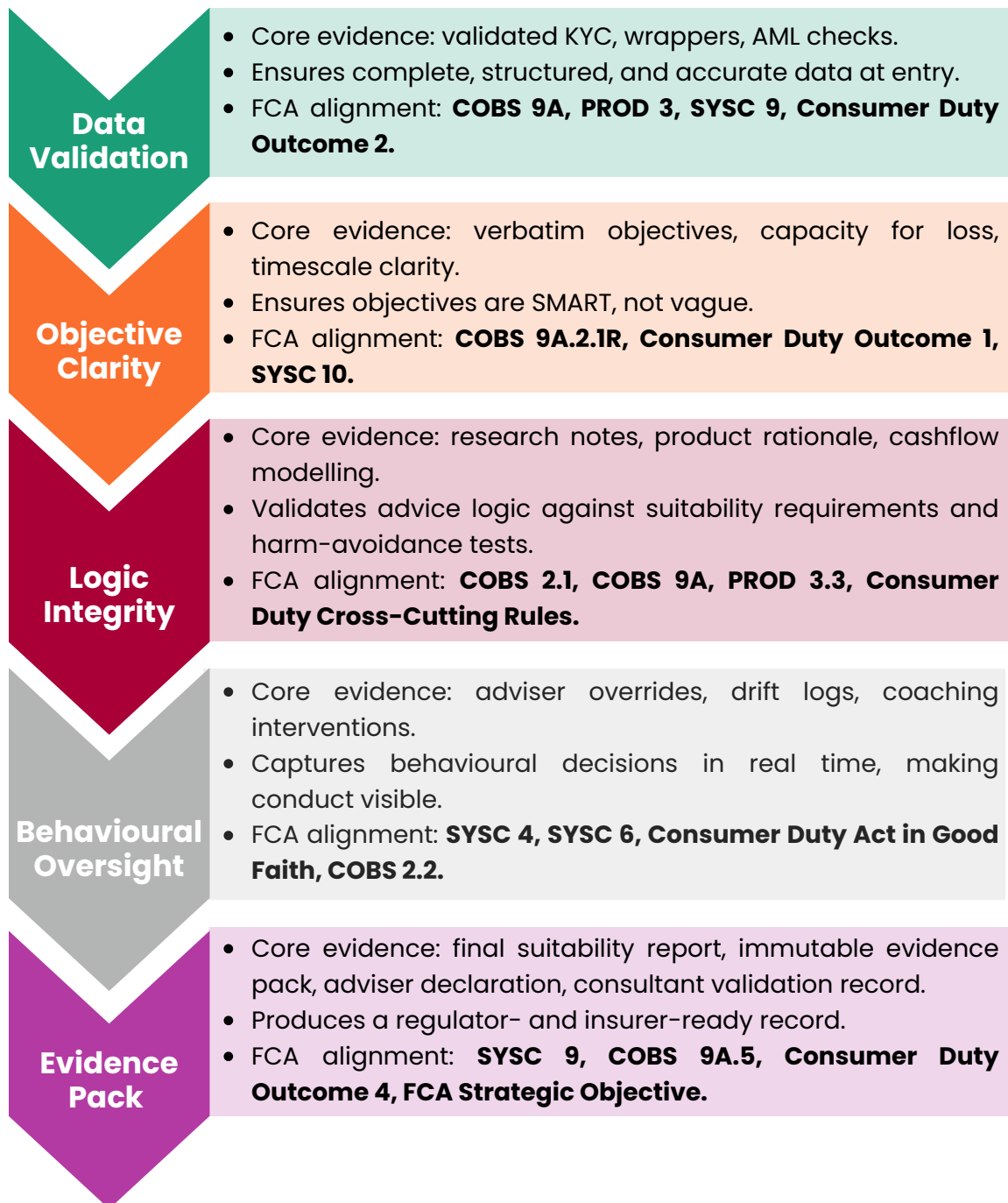
Why the Old Approach Fails

- ① It is **reactive**, not preventative.
- ② It is **subjective**, varying by reviewer.
- ③ It is **incomplete**, missing most files altogether.

Advice Integrity replaces plausible logic with proven evidence. It transforms advice files from assumptions into auditable proof, aligning directly with the FCA's regulatory expectations.

The Five Steps to Advice Integrity in Practice

Every recommendation is evidenced through five non-bypassable steps, operationalising FCA rules and creating a tamper-proof record:



This structured evidencing ensures every file is not only compliant but audit-proof, shifting firms from reactive defence to proactive integrity.

The Evidencing File

The Suitability Consultant works with a structured evidencing file, ten documents that align directly with the Five Steps. These include:

Data Validation	Objective Clarity	Logic Integrity	Behavioural Oversight	Evidence Pack
Client Fact Find	Objective Statement	Advice Rationale Note	Behavioural Log	Suitability Report Draft
Product Governance Evidence	Risk Profile Record	Product Governance Evidence		Evidence Pack
				Adviser Declaration
				Consultant Validation Record

This file transforms advice into structured evidence aligned to FCA requirements.

Override Discipline

Overrides are unavoidable in financial advice. The key is ensuring they are not hidden. In Advice Integrity systems, overrides are captured in real time, linked to adviser behaviour, and tested against the 132 FCA-aligned rules underpinning suitability.

This creates transparency, enabling firms to:

- Evidence conduct to regulators and insurers.
- Identify training needs.
- Reduce systemic risk.

Override discipline is the core of **Behavioural Oversight (Step 4)** and transforms judgement calls into auditable data.

Pathway Firms: Shaping the Standard

Early adopter firms, the **Pathway Firms**, are not just users, but co-authors of the Advice Integrity standard. They help shape implementation, stress-test evidence packs, and demonstrate to regulators and insurers how integrity is operationalised in real time.

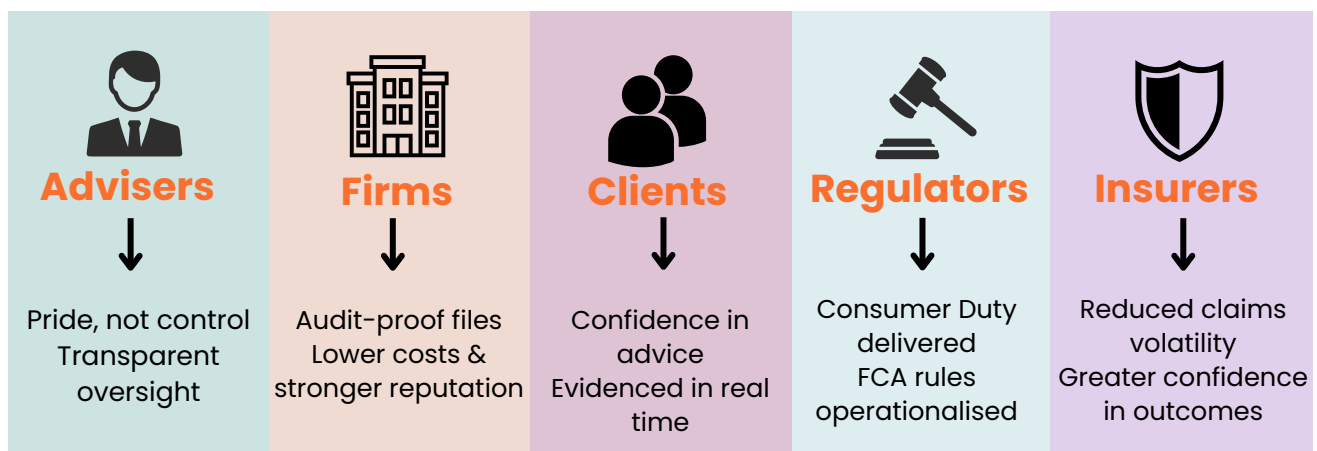
Benefits to Pathway Firms include:

- Early FCA-readiness for Consumer Duty compliance.
- Enhanced defensibility with PI insurers, reducing premiums.
- Increased acquisition value, with audit-proof advice files recognised as strategic assets.

Pathway Firms are proof that Advice Integrity is not theoretical, it is being embedded today.

“Becoming a Pathway Firm gave us the confidence that our files are already FCA-ready, not just patched after the fact.”

Outcomes for Stakeholders



Conclusion: Built to Prove It

Compliance is failing. Advice Integrity is the inevitable replacement.

Firms that embed the Five Steps are not defending advice, they are proving it. Pathway Firms are already demonstrating how integrity can be operationalised with audit-ready files, Suitability Consultants as custodians, and immutable evidence at scale.

The firms that move first will enjoy the benefits first: lower compliance costs, stronger defensibility with insurers, reputational resilience, and client confidence evidenced in real time. Regulators are already demanding outcomes; Advice Integrity is the way to deliver them.

**The shift is clear. Compliance looks backward.
Advice Integrity proves the future.**

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