



Govern It:

Why Advice Integrity Is a Board Level Responsibility

Compliance is failing. Advice Integrity is the inevitable replacement.

Under Consumer Duty and SM&CR, boards and senior managers are directly accountable for the integrity of the advice their firms deliver. The regulator has made it clear: “Boards must be able to evidence that the firm is delivering good outcomes.”

Traditional compliance systems cannot meet this requirement. Retrospective file checks and narrative-driven reports fail to prove suitability at scale. What boards require is a new operating model: Advice Integrity.

“Boards can no longer treat compliance as a back-office function.”

Advice Integrity is operationalised through the Five Steps framework, creating immutable evidence for every file, aligning directly with FCA rules, and giving boards the line of sight they need. The board’s duty is no longer to respond to risk, it is to govern integrity from the start.

Board takeaway:

Governance isn’t about oversight after the fact — it’s about proving integrity before risk exists. Boards that embed Advice Integrity move from reactive compliance to proactive assurance.

The Shift Has Already Happened

Firms that treat integrity as “compliance checks” lag behind. Complaints, PI volatility, and regulatory scrutiny continue. By contrast, firms embedding Advice Integrity demonstrate to regulators, insurers, and clients that suitability is proven in real time, every time.

Boards that act now protect not only their firms but their personal accountability under SM&CR. Advice Integrity is not optional governance; it is fiduciary duty.

What Is Advice Integrity Infrastructure?

Advice Integrity operationalises regulation into five non-bypassable steps, each aligned to FCA rules and board oversight:

1. **Data Validation** – Complete, structured, and accurate client information.

Board lens: Assurance that unsuitable products cannot enter the process.

2. **Objective Clarity** – Objectives tested against SMART standards.

Board lens: Clear evidence that advice outcomes are aligned to client goals.

3. **Logic Integrity** – Recommendations tested against suitability rules and foreseeable harm checks.

Board lens: Confidence that reasoning chains are defensible under audit.

4. **Behavioural Oversight** – Overrides, drift, and adviser decisions recorded in real time.

Board lens: MI dashboards provide visibility of conduct risks before they crystallise.

5. **Evidence Pack Generation** – Immutable, audit-ready files aligned to FCA reporting requirements.

Board lens: Immediate access to evidence packs for regulators, insurers, or acquirers

The Metrics Boards See



Data Validation

Complete and accurate client data

✓ 99%



Objective Clarity

SMART objectives recorded

✓ 100%



Logic Integrity

Minor misalignments

⚠ 95%



Behavioural Oversight

Overrides flagged

⚠ Monitoring



Evidence Pack Generation

Files audit-ready

✓ 100%

*Integrity isn't abstract – it's measurable.
The Advice Integrity Infrastructure turns governance into data.*

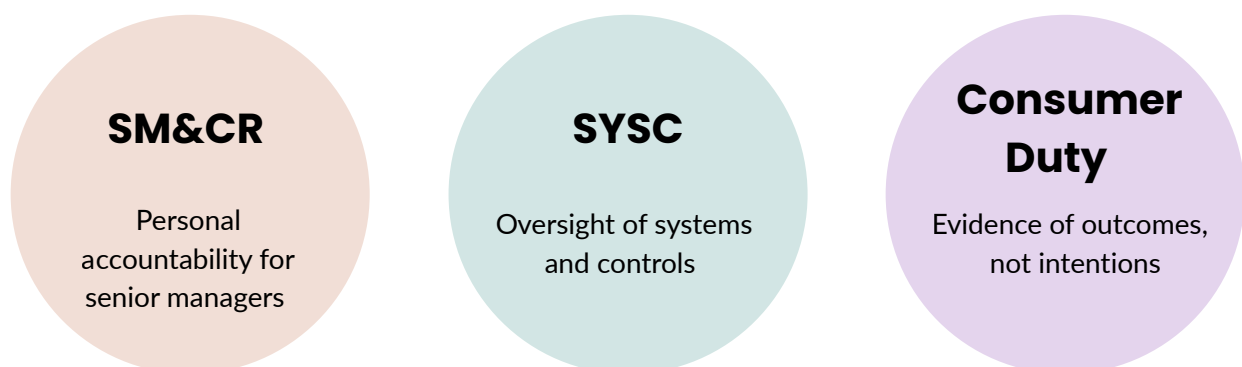
Old Compliance vs. Advice Integrity

Old Compliance QA	Advice Integrity Infrastructure:
Sampled files.	All files evidenced.
Subjective scoring.	Objective ruleset applied.
Delayed discovery of issues.	Real-time behavioural oversight.
Reputational risk remains.	Immutable evidence packs.

Board question:

“Which system can stand up to the FCA, insurers, and consolidators?”




Why the Board Must Own This



Together, these frameworks place integrity at the heart of governance – not compliance at its edges.

Case Example: Pathfinder Wealth

When Pathfinder Wealth embedded Advice Integrity infrastructure, the board gained quarterly dashboards showing adviser overrides, drift trends, and client objective alignment. For the first time, directors could evidence not just what advice was given, but whether it was good enough. PI insurers recognised the system as risk-reducing, delivering lower premiums.

Oversight metrics	 +35%
Drift incidents	 -12%
Premiums	 -8%

Benefits Beyond Compliance

- Regulatory Assurance: Boards can show direct delivery of Consumer Duty and SYSC requirements.
- PI Leverage: Immutable files reduce volatility, lowering premiums.
- Strategic MI: Behavioural oversight data becomes a boardroom risk indicator.
- M&A Readiness: Audit-proof files increase firm acquisition value.

“Advice Integrity didn’t just reduce rework – it gave us confidence in every recommendation we sign off.”
– Pathfinder Wealth Director

Role of the Suitability Consultant

Suitability Consultants are the human custodians of Advice Integrity. They validate the Five Steps, interpret behavioural patterns, and ensure every file is structurally sound and defensible.

Without Suitability Consultants, Advice Integrity remains static. With them, the system is self-correcting, continuously improving the firm’s governance posture.

Conclusion: It Starts in the Boardroom

Good advice isn't just well-written. It's well-governed. Boards that embed Advice Integrity shift their firms from audit-vulnerable to audit-proof. They meet their SM&CR obligations, satisfy regulators and insurers, and protect the trust of their clients.

Compliance is failing. Advice Integrity is the inevitable replacement.

Boards that govern integrity will not just pass the next audit, they will build the firms that last.

*"Integrity isn't a control - it's a culture."
Tony Slimmings, Managing Director, We Complement*

Want to see how Advice Integrity can transform your governance?

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