You can prove the process was followed.

Can you prove the customer got a fair outcome?

Consumer Duty outcomes · CONC 5.2A affordability · CONC 7 arrears & forbearance · FG21/1 vulnerability · DISP complaints & root cause

Across consumer credit, motor finance, credit cards, retail finance and specialist lending, harm is rarely made in one conversation.

It accumulates across an application, an affordability decision, a change in circumstances, an arrangement that was never sustainable, and a complaint that arrives two years later. Detect assesses the conversations, documents and case evidence together, so fair treatment is evidenced when the outcome happens, not reconstructed once the regulator asks.

One regulated outcome, nine places it is decided. Interaction QA reviews one row. The outcome is the whole column.

Interaction QA

Reviews one contact

01		
02		
03		
04		
05	Missed payment and arrears contact	QA score 92 · Pass
06		
07		
08		
09		

● **Contact passed** — 1 of 9 seen

Detect

Assesses the whole case · Daniel Reid · hire purchase

01	Application and affordability decision	Income verified
02	Acceptance and disclosure	Disclosure complete
03	Servicing contact	No issues
04	Change in circumstances disclosed	Reduced hours
05	Missed payment and arrears contact	Payment missed
06	Income and expenditure review	£84 disposable
07	Forbearance arrangement agreed	**Unsustainable**
08	Dissatisfaction, logged or not	**Not logged**
09	Redress, remediation or FOS referral	Open

● **Fair treatment not evidenced** — 3 indicators across 9 contacts and documents

37,700
FOS complaints about hire purchase in 2025/26, the most complained-about product of the year

8,800
Credit card complaints to FOS in 2025/26 alleging irresponsible or unaffordable lending

45.7m
UK adults (84%) held a credit or loan product in the previous 12 months

14.6m
Adults not coping financially, or finding it difficult to cope, in FCA cost-of-living research

Five things specialist lenders tell us they cannot currently evidence

Each of these is an outcome question, not a call-handling question. None of them can be answered from a sampled interaction score.

	What lenders tell us	Why it matters
01	"We can show a process was followed. We cannot always show the customer received a fair outcome."	Consumer Duty asks firms to assess, test and evidence the outcomes customers actually receive. Recycled operational MI does not answer it.
02	"Risk appears across the journey. QA happens interaction by interaction."	Vulnerability surfaces in a call, affordability in an application, the arrangement in a case note, and the harm in collections. Nobody sees the whole story.
03	"Sampling tells us what happened in the calls we reviewed, not what happened to our customers."	The material harm usually sits outside the sampled population, in the cases nobody had a reason to pull.
04	"We know a complaint happened. We struggle to find where the journey first went wrong."	The FCA's complaints review found MI that was not granular enough to understand outcomes for different customer groups, and interventions that were never tested for whether they worked.
05	"When challenged, assembling the evidence for why a customer got that outcome is manual."	Days of reconstruction across telephony, CRM, document stores and complaint files, and the answer depends on who built it.

FCA vulnerability review, 2025

Outcomes monitoring

Named as the area firms most needed to improve, after the review found consumers in vulnerable circumstances still receiving poorer outcomes than others.

Process QA asks whether the agent did the right things. Outcome assurance asks whether the customer was treated fairly.

Both matter. Only one of them answers the question the FCA is putting to specialist lenders, and it is the one most assurance programmes are not built for.

Level 01 · Call QA

Was the interaction handled correctly?

Scored against a checklist, on a sample, one contact at a time.

Level 02 · Compliance QA

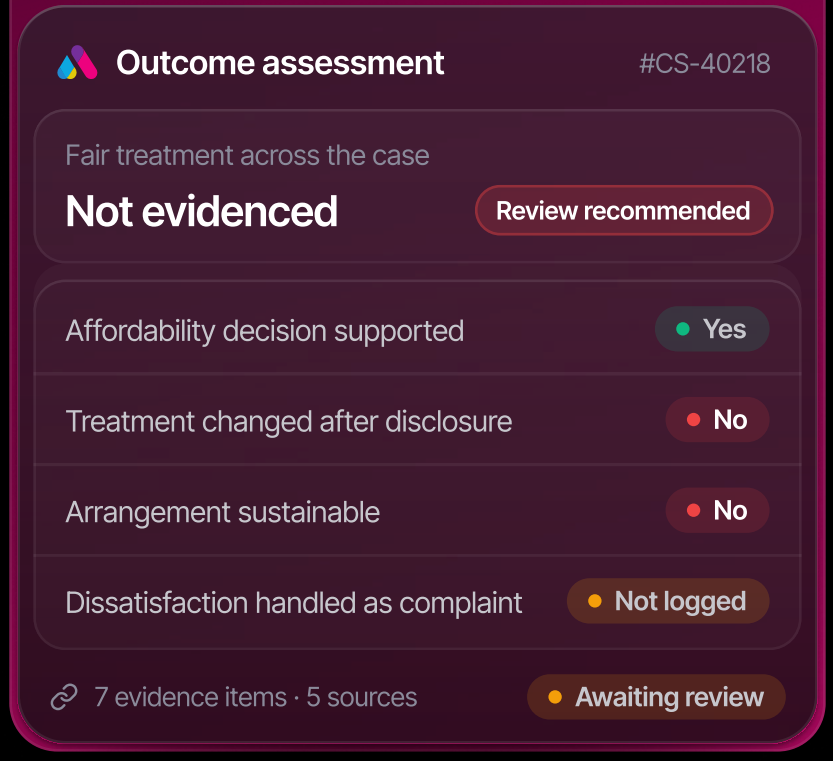
Were the required processes followed?

Regulatory checks applied to interactions. Still an adherence measure, not an outcome.

Level 03 · Outcome assurance

Did the customer receive fair treatment across the whole case, and can you prove it?

Where Detect operates



Traditional QA approach	The specialist-lending problem it leaves behind
Samples interactions	Significant harm sits outside the sampled population
Scores individual contacts	The outcome depends on several contacts, decisions and documents
Measures agent and process adherence	Consumer Duty asks firms to understand the outcomes customers received
Produces QA scores	Compliance needs evidence, root cause and proof that remediation worked

Five high-risk journeys across the specialist lending book

Firms rarely buy "assurance". They buy a fix for the journey currently generating complaints, redress or a 2LOD finding. Detect starts with one and extends across the book.

01 Unsecured · retail finance · cards · motor

Affordability and lending decisions

Assess whether the customer's circumstances were genuinely established and whether the decision is supported by the evidence on file, not whether the income and expenditure questions were asked.

02 FG21/1 · health, life events, resilience

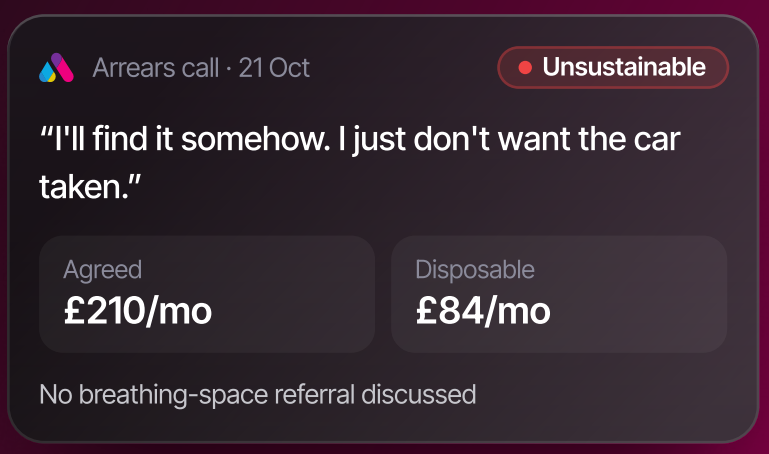
Vulnerability and financial difficulty

Redundancy mentioned on one call, a bereavement in an email, confusion about an arrangement months later. Detect identifies the signals across the case, then assesses whether treatment actually changed afterwards.

03 CONC 7 · arrears, arrangements, breathing space

Collections and forbearance

What did the customer tell us, what did we already know, what did we offer, was it sustainable, and what happened next? Forbearance and due consideration is a contextual judgement, and Detect assembles the context.



04 DISP · FOS exposure · redress exercises

Complaints, root cause and remediation

Review the complaint, the journey underneath it, the decision and the evidence together, including dissatisfaction from customers who never used the word complaint, so DISP root-cause analysis starts from a complete population.

05 Vulnerable cohorts · partners · products

Outcome consistency across cohorts

Consumer Duty does not only ask whether one customer was harmed. It asks whether groups of customers are receiving worse outcomes than others. Detect compares treatment across products, teams, channels and customer segments.

Typical entry point. Start with the single journey where assurance is most manual today: usually collections, complaints or a live remediation exercise. Run Detect alongside your current QA and compare what each one found.

aveni detect • Specialist lending

How Detect works

Five layers between a raw interaction and defensible outcome evidence

Detect assesses the conversations, documents and case evidence together.

Raw interaction → Defensible outcome evidence

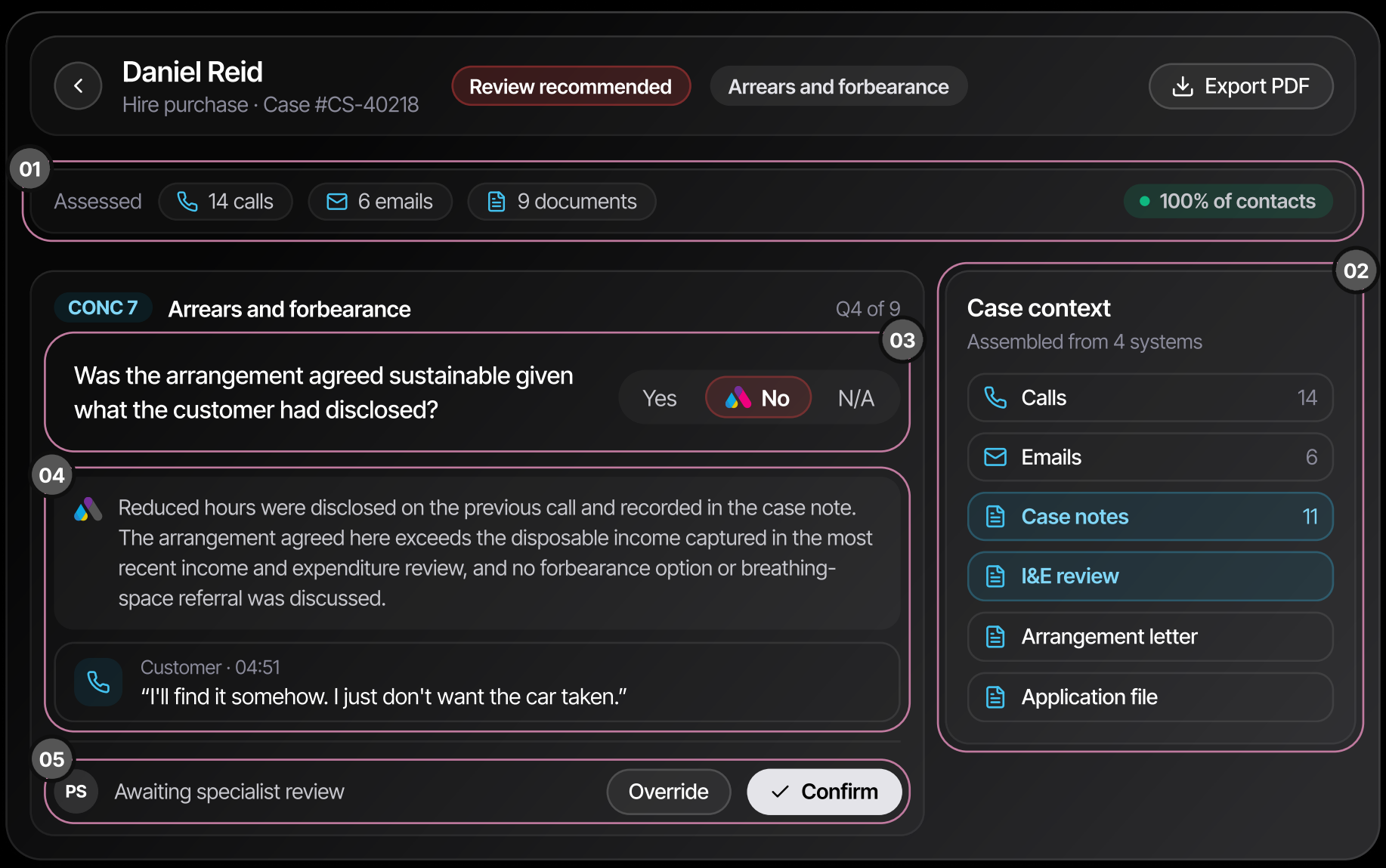
01 **Interaction coverage**
Every relevant interaction across voice, digital and written channels, rather than a sample.

02 **Case context**
Calls, case notes, correspondence, affordability information and documents assembled into one customer case.

03 **Regulatory judgement**
Assessed by FinLLM against vulnerability, affordability, forbearance, complaint and Consumer Duty standards configured to your framework.

04 **Outcome evidence**
Every indicator carries an explanation and the underlying evidence, retained and retrievable in minutes.

05 **Human judgement**
Detect triages and assesses. Your specialists review, override and sign off. **Around 77 automated assessments per manual review.**



Runs on the systems you already have

Telephony, collections, complaints and document systems as they are. No replacement of your loan management platform or CRM.

UK-hosted, no training on your data

Customer data is never used to train FinLLM or any shared model, including books serviced by third-party partners.

Assessing 100% of interactions is becoming table stakes. Evidencing the outcome is not.

Most modern QA platforms now score every conversation. The question worth asking a vendor is what happens after the score.

Interaction intelligence

Helps you understand interactions.

Built for the contact centre: quality scores, agent performance, coaching, conversation analytics and compliance monitoring across every call and digital contact.

vs

Outcome assurance · Detect

Helps compliance determine and evidence the outcome.

Built for the second line: the regulated customer case assessed end to end, judged against FS-specific standards, with the evidence, the root cause and the reviewer decision retained.

Six questions to ask a vendor

01 Can you assess a customer case, or only an interaction?

02 Can you read documents and case evidence, or only conversations?

03 Is the model trained on UK financial services regulation and language?

04 Does every flag carry an explanation and the underlying evidence?

05 Can you compare outcomes across customer cohorts, not just agents?

06 Is the reviewer's decision retained as part of the audit trail?

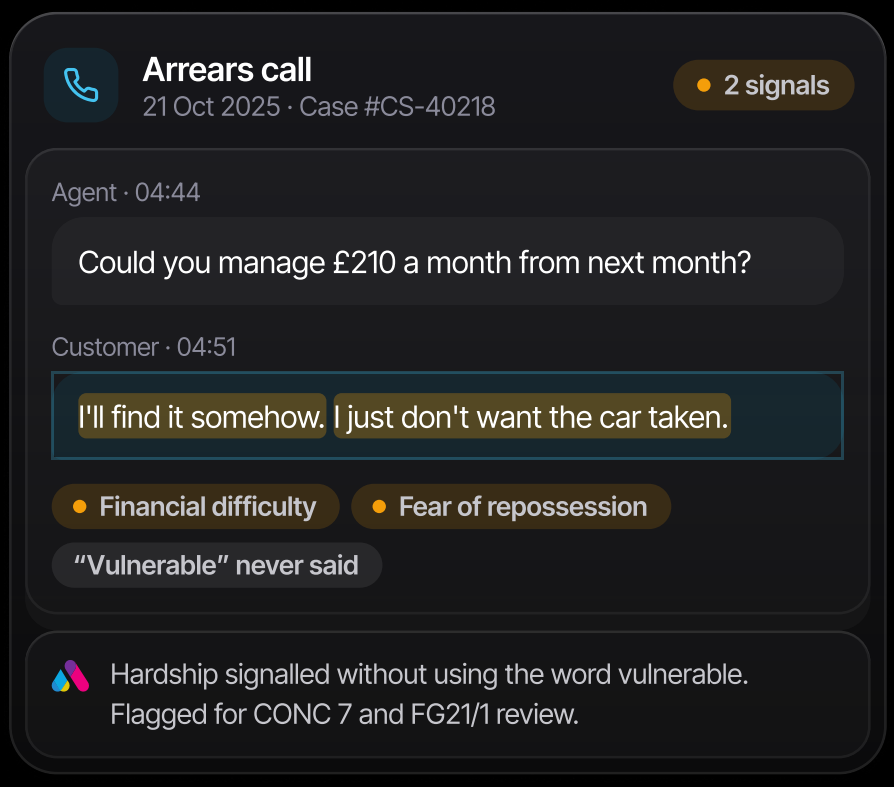
The lesson of the motor finance redress scheme is not about commission. It is that firms which cannot reconstruct why a customer received a particular outcome, years later, face remediation that is slower, costlier and harder to defend. The alternative is building that evidence at the time the outcome happens.

aveni detect • Specialist lending

Powered by FinLLM

Trained on financial services language, not general text

FinLLM understands the language of a lending case: affordability assessments and income and expenditure reviews, arrears, breathing space and payment arrangements, forbearance and default, commission, redress and final response letters, and the way customers signal hardship without ever using the word vulnerable.



UK-hosted, secure, built for regulated firms

Your customer data is never used to train FinLLM or any shared model. What improves with use is your own configuration: reviewer decisions and calibration inside your tenant tune the scorecard, thresholds and prioritisation without data leaving your governance boundary.

Book a demo

Evidence fair treatment when the outcome happens, not when the regulator asks

Book a demo and we will run Detect against one of your own high-risk journeys (affordability decisions, arrears and forbearance, complaint files or a live remediation exercise) alongside your current QA, so you can see what each approach found.

Book a demo

aveni.ai

Sources: Financial Ombudsman Service complaints data 2025/26 (hire purchase and credit card complaint volumes); FCA Financial Lives 2024 and January 2024 cost-of-living research (credit product holding, financial coping); FCA vulnerability review 2025; FCA review of complaints handling and root cause analysis; FCA FG21/1, CONC 5.2A, CONC 7 and the Consumer Duty; performance figures from Aveni customer deployments. Detect generates risk indicators with supporting evidence for specialist review. It does not make regulatory determinations.