

FCA Consumer Duty

DATA LED IMPLEMENTATION



Businesses have defined what their strategy to Consumer Duty is but, many are struggling to deliver the outcomes required to become compliant.

STRATEGY DEFINED

Organisations have understood the requirements under the Consumer Duty Regulations and have produced high level strategies and approaches (e.g. Board Papers) on how it can be met and have begun reviewing products and processes to achieve compliance.

TARGET SOLUTION UNDERSTOOD

One major component of the regulation is demonstrating compliance with the regulation. This covers solutions and processes and organisations have defined what this could look like – quite commonly a suite of dashboards to monitor and track key KPI's.

COMMON CHALLENGES

Organisations have got to the Implementation Phase. There is a realisation that due to a lack of foundational Data Management and Governance Capabilities a Data Driven approach has not been possible.

- 1. DATA LANDSCAPE COMPLEXITY:** Many Financial Services organisations have complex data landscapes and often this landscape is poorly understood. In the implementation phase; this has led to difficulties in identifying which KPI's and Metrics are feasible and appropriate to report on to demonstrate compliance. This is usually due to inadequate documentation and a poor understanding of the data architecture.
- 2. MISALIGNED DATA DESIGN:** Whilst the required regulatory change has been identified this often has not been appropriately translated into a Data Design: technical data architectures and designs that can be implemented by technology teams.
- 3. DATA QUALITY ISSUES:** As the build has progressed, due to the lack of visibility of Data Quality Metrics within various data stores and systems. The data that was intended to fulfil the regulatory requirements has been found to be of insufficient quality.
- 4. OVER ENGINEERED SOLUTIONS:** Projects have lost sight of the MVP needed to deliver the solution. None essential requirements have introduced complexity that risks the core regulatory delivery

HOW GLUE REPLY ARE ENABLING OUR CLIENTS

ACCELERATING COMPLIANCE THROUGH OUR DATA EXPERTISE



- Glue Reply have developed a “Data Landscape Discovery Framework” that can be leveraged by businesses to rapidly define, identify and then source the KPI’s & Metrics required to monitor, track and demonstrate compliance against the FCA regulations.
- We are supporting organisations to quickly identify and source the key data elements needed to achieve compliance through our data led approach and identify any Data Quality issues.

DATA CAPABILITY FACTORIES



- We are working with our clients to rapidly establish “surge” Data Capabilities. Allowing them to meet the FCA Consumer Duty deadlines, covering both Data Quality and Data Engineering capabilities.
- We have established a Data Quality Factory at an Insurer to accelerate the profiling and sourcing of Data. Remediating Data Quality issues which were blocking their implementation of Consumer Duty.
- Additionally, we are assessing the company’s capability gaps and supporting them in defining a strategic approach to Data Management and Data Quality. Ensuring that they leverage strategic tooling, governance and processes.

A MODERN APPROACH TO REGULATORY CHANGE

FUTURE PROOFING BY INTRODUCING A DATA PRODUCT CENTRIC APPROACH TO REGULATORY COMPLIANCE

As new regulations continue to be introduced, and further change is required to the current implementation approach. Complying with regulatory change is introducing an ever increasing number of unsustainable tactical solutions within many organisations' Data Landscape.

With further change expected due Consumer Duty for Closed Book Business, 5th Gen Money Laundering and CSRD. Running expensive compliance programmes is inefficient and unsustainable.



UNDERSTAND

As a first step organisations need to understand their Data Maturity in key capabilities, Data Flows and their Data Landscape.

This will enable them to understand how their data supports the business and it's strategy and where there are gaps and pain points that need to be addressed.



MODERNISE

Against the Business Strategy and Business Goals the gaps in the Technology and Data of the organisation need to be modernised.

This is an incremental process where business value should continuously be delivered in the process of creating a modern data architecture that enables innovative use cases



GOVERN

Appropriately manage and govern the data estate, via Data Management Tools and monitor Data Management KPI's and Data Quality metrics to iteratively drive improvements that deliver real business benefit.

Engage business stakeholders via Data Owners, Stewards and Committees and Working Groups to increase data literacy and best practice



DEMOCRATISE

Through Modern Data Architectures and Data Governance Tooling Data Consumers understand the Data Landscape and can self-serve to leverage data to deliver Business Outcomes.

Best Practice & Modern Ways of Working enable the rapid delivery of high-quality trusted Data Products to meet regulatory requirements.



www.reply.com/glue-reply/en/



www.linkedin.com/company/glue-reply



glue@reply.com



+44 (0)20 7730 6000