

## KEY LEARNING OUTCOMES FROM THE FCA

*“Consumer Duty & culture are integrated: You can’t have one without the other and expect to achieve success.”*



Consumer Duty and organisational culture are inseparable; success in one requires the other.



Leading firms are integrating the Duty into remuneration, incentive strategies, and individual performance objectives for every employee.



A healthy culture empowers staff to think critically and move beyond rigid processes to meet specific customer needs, particularly regarding vulnerability.



Data from the Institute of Customer Service suggests a direct correlation between high-quality customer service (driven by culture) and stronger financial performance.



Research shows that consistent cultural improvements have led to a steady rise in consumer trust over the last seven years, driving better Net Promoter Scores (NPS) and word-of-mouth recommendations.

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*“Culture is the thread that binds people, processes and purpose.”*

Focus Area	Regulatory Expectation	Practical Application
<b>Tone from the Top</b>	Leadership must align business strategy and incentives with the Duty.	Boardroom decisions must explicitly consider consumer fairness and value at every stage.
<b>Psychological Safety</b>	Creating a “safe to fail” environment where mistakes are data points.	Encouraging staff to identify risks and learn from errors without fear of punitive action.
<b>Organisational Reach</b>	The Duty must permeate every level of the business.	Ensuring front-line staff and back-office operations share the same definition of “good outcomes.”
<b>Continuous Loop</b>	A willingness to listen, learn, and improve over time.	Moving away from a “once-and-done” checklist toward a mindset of constant refinement.

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*“Competence under the Duty is not a one-off achievement. It requires ongoing learning, regular reflection, and a willingness to adapt as customer needs and expectations evolve.”*

Focus Area	Regulatory Expectation	Best Practice
<b>Targeted Training</b>	Learning should be personalised by role and function.	Providing specific materials to help different teams understand their unique impact on outcomes.
<b>Vulnerability Support</b>	Building deep understanding of specific customer cohorts.	Partnering with charities to provide staff with specialist training on consumer vulnerability.
<b>Staff Wellbeing</b>	Recognising the link between employee “drain” and poor outcomes.	Allowing agents to “depressurise” after difficult calls and providing mental health support.
<b>Performance Metrics</b>	Moving away from purely productivity-based targets.	Replacing sales or volume metrics with “Customer Advocacy” and satisfaction scores.

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*“Looking back to our work on Board Reports, firms that scored positively were able to show they had collected a wide range of qualitative and quantitative data.”*

Focus Area	Regulatory Expectation	Evidence Method
<b>Data Integration</b>	Using a rich mix of insights to monitor outcomes.	Combining qualitative feedback (customer comments) with quantitative testing and metrics.
<b>Board Reporting</b>	Demonstrating that the Duty is culturally embedded.	Using annual reports to show how incentives and decision-making align with the Duty.
<b>Root Cause Analysis</b>	Taking action when risks of poor outcomes are identified.	Tracking how process updates or operational shifts have directly addressed identified failures.
<b>Foreseeable Harm</b>	Proactively identifying and mitigating potential risks.	Using data to monitor outcomes for vulnerable groups and implementing tailored controls.