

FREE GUIDE · FOR FCA-REGULATED UK FIRMS

Consumer Duty Call Monitoring Readiness Checklist

A practical 24-point self-assessment for compliance officers, operations directors, and heads of customer outcomes. Designed to surface the gaps the FCA's Consumer Duty supervisory teams are most likely to ask about — before they ask.

How to use this checklist

Work through each section and tick every item you can **evidence in writing** if asked tomorrow. "We probably do that" doesn't count. "We've a documented process, with an owner, that produces an audit trail" does. Add up your ticks at the end; the scoring band on page 4 tells you roughly where you stand against current FCA expectations.

Context: Consumer Duty (PRIN 2A) requires firms to deliver good outcomes and to monitor those outcomes across the whole customer journey. Since the FCA's 2024–2025 supervisory letters, the bar for what counts as adequate monitoring has risen sharply. Manual call sampling of 1–2% is no longer considered defensible for firms doing material volume of phone-based sales or service.

A. Coverage and sampling

How much of your call volume is actually being looked at, and how is the sample chosen?

- We review (manually or via tooling) at least 5% of inbound and outbound calls per agent, per week.
- Our sample is randomised, not hand-picked by line managers from "good" calls.
- The sample is weighted toward higher-risk calls — complex products, complaints, vulnerable customers.
- Our sampling methodology is documented in writing and approved by a compliance owner.

B. Vulnerability identification

FG21/1 expects firms to identify vulnerable customers across the entire interaction stream, not just where the agent has remembered to tick a box.

- Every call has some form of vulnerability check applied — not only the calls the agent flags.
- Vulnerability indicators heard on calls (e.g. bereavement, financial difficulty, health) are auditable.
- Vulnerability flags are reviewed by a named second person — they don't auto-close on agent disposition.
- We can produce, on demand, a report of how vulnerable customers fared by product line in the last 12 months.

C. Outcome capture

Consumer Duty is outcomes-based. The FCA wants to see that you can connect a conversation to what eventually happened to the customer.

- Any individual call can be tied to the eventual outcome (sale, lapse, complaint, claim).
- We measure outcomes by customer cohort — not just total sales numbers.
- We have a working classification of "good outcome" and "foreseeable harm" for our products.
- Outcome trends are reviewed at least quarterly, with documented actions when they slip.

D. Script and disclosure adherence

Mandatory disclosures only count if they were actually said — and if you can prove it.

- We have a documented, version-controlled call structure with required disclosures per product.
- We check that disclosures were actually *heard* on the call — not just that a CRM box was ticked.
- Non-adherence is escalated, evidenced, and re-trained — with a record of the loop closing.
- Script changes after product or regulatory updates land on the floor within a defined SLA.

E. Complaint linkage and retrieval

DISP 1 requires call recording retrieval; Consumer Duty pushes you further — root causes should be evidenced from the calls themselves, not constructed from CRM notes.

- We can retrieve the full audio for any complaint-related call within 15 minutes.
- Call audio is retained for at least 7 years and survives staff turnover and CRM changes.
- Complaint root-cause analysis cites the call evidence, not just agent recollection.
- Repeat complaint themes are tracked across calls — not just within individual files.

F. Board-level reporting

Annual Consumer Duty board reports must be more than narrative. The FCA expects underlying evidence the board has actually seen and challenged.

- Our Consumer Duty board pack includes call-level evidence, not just CRM aggregates.
- Vulnerable customer outcomes are reported as a separate line — visible to the board.
- Outcome trends are tracked month-on-month, not as an annual snapshot.
- Board challenge on the report is minuted and actioned — there's a paper trail.

G. Agent feedback and training loop

If monitoring doesn't reach the agent, it isn't monitoring — it's a filing exercise.

- Agents receive call-level feedback within a defined window (typically 7 days of the call).
- Coaching sessions are evidenced — not just dated, but with the specific call references discussed.
- Repeat coaching issues by agent are tracked and surfaced to line management.
- Training records are linked to specific monitored calls, not generic course completions.

Your score

Count the boxes you've ticked across all seven sections. Total possible: **28**.

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|----------------|--|
| 24 – 28 | Strong. You are likely defensible at a Consumer Duty supervisory visit. Focus on continuous improvement and keeping evidence current. |
| 17 – 23 | Moderate gaps. Specific areas need work — usually outcome capture, vulnerability evidencing, or board reporting. Material risk in a Section 166 review. |
| 9 – 16 | Significant gaps. Manual sampling is unlikely to close these. Most firms in this band need either headcount or tooling to reach defensible. |
| 0 – 8 | High risk. Material remediation required. Recommend immediate external review and a remediation plan with board sign-off. |

A note on tooling. Most firms scoring under 20 conclude that they need either (a) significantly more compliance headcount, or (b) a call analytics platform that scores 100% of calls automatically. Telebyte Call Analytics was built for (b) — and built specifically for UK FCA-regulated firms that don't want enterprise pricing.

Want help closing the gaps?

Telebyte runs a 30-minute readiness call — no slides, no sales pitch. You walk us through your current setup and we tell you, honestly, what's defensible and what isn't. Telebyte's reference deployment is a live FCA-regulated brokerage, so this is the conversation we have every working day.

[Book a 30-minute readiness call](#)

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This document is informational and does not constitute legal or regulatory advice. Firms should consult their own compliance function and the FCA Handbook (in particular PRIN 2A, FG2 1/1, and DISP) for authoritative guidance.