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CONSUMER DUTY DATA FORUM WEBINAR

Technology & practical implementation

A practical guide

Building a data-driven advice firm: getting more from the systems you already have

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INTRODUCTION

The message

Most firms don't need new technology. They need the systems they already pay for configured, connected and used consistently.

This guide accompanies the Consumer Duty Data Forum webinar, **Building a Data-Driven Advice Firm: How to Manage, Use and Report Your Data**, on 17 November 2026. It sits alongside the Forum's 2026 How to Manage and Report Your Data Good Practice Guide and its Data Strategy Checklist.

Why technology matters now. The FCA's supervision is increasingly data-led. It expects accurate, structured and comparable data to evidence Consumer Duty outcomes, spot emerging risks and respond to Section 165 information requests. That evidence comes from the systems firms already use, so how those systems are set up and used is now a regulatory question as well as an efficiency one.

This guide covers the practical side of technology for a data-driven advice firm, in three areas:

1
CRM and data limitations
Structured and unstructured data, incomplete records, fragmented systems

2
Integration and automation
Better data flows, less re-keying and a clear audit trail

3
AI readiness and value
Getting more from existing systems while managing AI safely

The same foundation of good data, clear processes and consistent use is what makes AI safe to adopt under the FCA's existing rules.

About Jigsaw Tree: a fintech outsourcing and consultancy partner for financial advice firms since 2012, working across CRM and data, integration and automation, and AI readiness.

SECTION 1

CRM and data limitations

1.1 Why do firms still struggle with data when most have a modern CRM?

The CRM is rarely the problem. Implementation and adoption are. The main UK systems, including intelliflo office, Xplan, Curo, Plannr and Dynamic Planner, all hold structured fields for objectives, risk, vulnerability, services and fees. The gap is consistent use:

- **Built around old habits:** systems set up to copy legacy processes, with data only part-migrated.
- **Inconsistent use:** notes typed where fields belong, and each adviser completing the fact find differently.

> **JIGSAW TREE IN PRACTICE**
> Database assessments show firms the real state of their data. We then configure best-practice workflows across io, Plannr, Curo and Xplan.

1.2 How should firms manage unstructured data such as notes, emails and documents?

- **Structure what you report.** Anything you would report to the Board or the FCA belongs in structured fields with pick-lists, not free text: vulnerability, attitude to risk, objectives, review dates, fees and products.
- **File documents consistently.** Keep documents as evidence, filed against the client by type, subject and date.
- **Review AI-captured data.** AI note-takers can turn meeting notes into fact-find data, but an adviser must approve the output before it is saved.

> **JIGSAW TREE IN PRACTICE**
> We set document type and naming standards during system migrations. Search only works when the metadata is right, a common lesson from migrations.

1.3 What is the first practical step for incomplete records and fragmented systems?

1. Agree **one system of record** for each key data item.
2. Audit the **10 to 15 fields** that drive your Consumer Duty MI.
3. Make those fields **mandatory**, or use workflow steps so a case can't move forward with gaps.
4. Fix existing records in priority order, starting with **ongoing-service and vulnerable clients**.
5. Run regular **exception reports** so quality doesn't slip.

JIGSAW TREE IN PRACTICE
Process mapping and workflow build, training every user to the same standard, and floor-walking at go-live so new habits stick.

SECTION 2

Integration and automation

2.1 Where are the biggest gains from better integration?

The biggest gains come from removing re-keying between the CRM, platforms, cash-flow and risk tools, and compliance checking. **Every re-key is an error waiting to happen, and a gap in the audit trail.**

Start with what you already pay for. Switch on platform data feeds and standard integrations for risk profiling, cash flow, the client portal and e-signature.

JIGSAW TREE IN PRACTICE
Independent technology selection that tests how deep integrations really go, not just whether a logo appears on a partner list.

2.2 How should firms decide what to automate?

- **Automate the routine.** High-volume, rules-based tasks with clear inputs: review scheduling, task chasing, data-feed reconciliation, income reconciliation and standard letters.
- **Keep people in.** Wherever advice, vulnerability or exceptions are involved.
- **Map the process first.** Automating a broken process just produces the wrong result faster.

EDDIE IN PRACTICE
Eddie, Jigsaw Tree's AI income reconciliation service, does the heavy lifting while specialists review every exception.

80%
Up to 80% of the workflow automated

240+
Hours saved per firm, per year

2.3 How do firms keep an audit trail when data moves between systems?

- **Work in workflows.** Run key processes through CRM workflows, which time-stamp tasks and outcomes.
- **Write back status.** Make sure integrations report back, for example e-signature progress and portal uploads filed by type.
- **Close side doors.** No client data in personal email or shared drives.

- **Keep a register.** For each integration, record the owner, what data passes and who is alerted if it fails.

> **JIGSAW TREE IN PRACTICE**
> Mapping where one system starts and another stops, including the final resting place for every client document.

SECTION 3

AI readiness and technology value

3.1 How can firms get more from systems they already have?

Most firms use a fraction of what they pay for. Before buying anything new:

- **Audit unused features:** standard dashboards, advanced searches and exports, workflow templates, the client portal and the AI assistants now built into core CRMs.
- **Refresh training and check licences.**
- **Health check before you replace.** A configuration review often delivers more value than a new system.

> **JIGSAW TREE IN PRACTICE**
> Consultancy health checks and roadmaps, from discovery to delivery, then projects and training to implement them.

3.2 What does being "AI-ready" mean in practice?

There are three foundations:

FOUNDATION 1	FOUNDATION 2	FOUNDATION 3
Clean, structured data	**Documented processes**	**Governance**
AI amplifies poor data.	With clear decision points.	Accountable senior manager, AI use register, risk assessment per use case, human review and outcome monitoring.

Start small. Begin with low-risk internal uses such as meeting notes, admin and reconciliation, and pilot before scaling, in line with the FCA's October 2026 good-practice findings.

> **JIGSAW TREE IN PRACTICE**
> Data and process readiness work before AI is introduced, so tools are built on firm foundations.

3.3 How should firms manage agentic AI and keep human oversight?

There is no separate AI regime. Consumer Duty, SM&CR and operational resilience all apply. For each agentic workflow:

- **Define autonomy:** what the AI can do alone, and what needs approval.
- **Set escalation triggers:** vulnerability indicators, values above a threshold, or anything client-facing.
- **Log and review:** log every action, and review output before it reaches the client file or the client.
- **Test and monitor:** test across different customer types and track live outcomes.

> **EDDIE IN PRACTICE**
> Human in the loop by design: AI does the heavy lifting and specialists check every anomaly.

3.4 How should firms manage cyber risk and supplier dependency?

- **Due diligence on every AI supplier:** where data is hosted, whether it is used to train models, security certifications, sub-processors, notice of model changes and an exit plan.
- **Avoid single dependency:** don't rely on one model or provider, and include AI in business continuity planning.
- **Control shadow AI:** a clear policy and approved tools, so client data isn't pasted into public AI.

> **JIGSAW TREE IN PRACTICE**
> Supplier due diligence built into RFI and RFP processes. Eddie is UK-hosted, and client data is never used to train public AI models.

PANEL Q&A

The technology perspective

The chair's cross-panel questions, answered from a technology and practical implementation point of view.

What are the most important data improvements to prioritise over the next 90 days?

Focus on the few fields and connections that drive your Consumer Duty MI, rather than a full system overhaul. The same plan works for a 1 to 5 adviser firm and a larger business; only the volume of records changes.

Days 1 to 30	Agree one system of record for each key data item, and audit the 10 to 15 fields that drive your Consumer Duty MI.
Days 31 to 60	Make those fields mandatory or enforce them through workflow steps, and switch on the platform feeds and integrations you already pay for.
Days 61 to 90	Cleanse ongoing-service and vulnerable client records first, start regular exception reports, and set up an integration register.

How can firms introduce AI and agentic AI while keeping human oversight and accountability?

Start with clean data and documented processes, then apply the governance already required under Consumer Duty, SM&CR and operational resilience. In practice: a named accountable senior manager, a register of AI uses, a risk assessment for each use case, defined limits on what the AI can do alone, escalation triggers, and human review before output reaches the client. Begin with low-risk internal uses and pilot before scaling (see sections 3.2 and 3.3).

How can firms show that investment in data and technology improves outcomes and performance?

Set a baseline before any change, then track a small number of measures over time:

- **Data completeness:** the percentage of clients with every key Consumer Duty field completed.
- **Exceptions:** the number of exceptions on regular reports, and how quickly they are cleared.
- **Time saved:** hours of re-keying and manual reconciliation removed by integration and automation. Eddie, for example, saves firms more than 240 hours a year.
- **Service delivery:** reviews completed on schedule for ongoing-service clients.
- **Speed of evidence:** how quickly the firm can produce MI for the Board or answer an FCA information request.

SUMMARY

Key takeaways

Get more from what you already have. Good data, connected systems and governed AI are achievable for firms of any size, starting with what they already own.

1	2	3
Fix the foundations	**Connect, then automate**	**Govern AI**
One system of record, structured fields and consistent use.	Integrations you already pay for, and a mapped process before automation.	Accountability, a human in the loop and outcome monitoring.

Together, these support the panel's shared takeaway: **connect technology with governance** by improving integration, automating where appropriate and maintaining effective AI oversight.

Practical checklist

- One system of record agreed for each key data item
- The 10 to 15 Consumer Duty MI fields audited and made compulsory
- Ongoing-service and vulnerable client records cleansed first
- Exception reports scheduled
- Existing platform feeds and standard integrations switched on
- Processes mapped before anything is automated
- Integration register in place (owner, data passed, failure alerts)
- Unused CRM features, training and licences reviewed
- AI governance in place: accountable senior manager, use register, risk assessments, human review
- AI supplier due diligence completed and a shadow AI policy issued

GET IN TOUCH

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