



Transforming compliance

How AI is redefining outcomes testing
and assurance

Outcomes testing as the next frontier in compliance

Artificial intelligence (AI) is redefining the landscape of risk and compliance in financial services. Where once compliance was reactive, retrospective, and heavily manual, AI now enables a more automated, forward-looking, data-driven approach to oversight, increasing the efficiency of critical activities such as customer outcomes testing.

In the previous instalment in our Compliance & Controls series – [Reimagining the Rulebook: How AI is Reshaping Risk, Compliance and Control in Regulated Industries](#) – we discussed the pivotal role of AI in modernizing compliance. In this article, we take a deeper look at how AI can enable firms to evidence customer outcomes more effectively, enhance control assurance, and drive fairer treatment through data-driven insights.

Outcomes testing goes beyond confirming whether policies and controls exist. It evaluates whether those controls deliver the outcomes expected by customers across products and services, price and value, customer support, customer understanding and vulnerability – a growing expectation across regulatory regimes worldwide. In the UK, the FCA's Consumer Duty is one prominent example of this trend, but it is far from unique.

We believe AI can transform outcomes testing from a costly, manual exercise into a continuous source of assurance and insight. Implemented responsibly, it can strengthen compliance, improve customer experience, and build the trust that regulators and customers demand.



The compliance opportunity: raising the bar across markets

Throughout global financial services regulatory authorities are sharpening their focus on customer outcomes. Whether framed as “treating customers fairly”, “consumer duty” or “fair lending”, the principle is the same: firms must demonstrate that their products and services deliver good outcomes in practice, not just on paper.

Traditional methods of outcomes testing tend to fall short. Manual reviews of call transcripts, fragmented control assessments and retrospective investigations are resource-heavy and prone to blind spots. Furthermore, they often fail to capture the lived experience of customers, particularly those facing additional risks or vulnerabilities.

Demonstrating effective outcomes also carries significant organizational strain. In many firms, this still means heavily manual, time-consuming re-performance testing – compliance teams are effectively searching for a ‘needle in a haystack’. Significant effort is spent re-reviewing all cases where effective outcomes were previously achieved, as there is no mechanism to specifically focus that effort purely on potentially higher-risk interactions. It is also difficult to engineer sample sizes that are truly representative at a manageable cost, further limiting both efficiency and assurance.

The impact of this is clear: outcomes testing remains reactive rather than proactive, eroding organizational agility and resilience. It drives up

cost without necessarily improving outcomes, while customers see little tangible value as cases of detriment go unidentified and processes fail to improve.

AI changes the equation. With the ability to process vast volumes of customer interactions, identify patterns, and surface risks quickly, AI can provide firms with:

- **Continuous assurance** that customer treatment aligns with policies and regulatory standards
- **Early detection** of risks, such as signals of customer vulnerability being missed or recurring complaint themes
- **Integrated oversight** linking outcomes testing with controls testing, showing whether controls are not only well designed but also operating effectively
- **Modular build-out** allowing for phased implementation, and models that can learn and improve over time to provide accuracy and breadth of coverage.

The opportunity is not just to meet compliance obligations, but to reframe compliance as a driver of better customer journeys, operational efficiency and organizational resilience by focusing resources on the cases and activities that matter most.

Compliance Assist – part of Capco’s **AI Smart Suite** offering – is our end-to-end solution for embedding AI across an organisation’s control environment. It integrates regulatory horizon scanning, Policy, Procedure & Contract checking, control testing, outcome testing and customer journey analysis into one cohesive framework. By automating design and performance assessments, mapping controls back to policy, and aligning them to regulatory requirements and expected customer outcomes, Compliance Assist enables a far more connected and efficient approach than siloed tools.

Outcomes testing and vulnerable customers

How an organization treats its most vulnerable customers is one of the highest-risk areas of customer interaction, and one where outcomes testing can deliver immediate value.

AI-powered solutions such as **Compliance Assist** offer a practical path forward. By transcribing and summarizing calls, its sentiment and vulnerability analysis capabilities can flag key words, tones, or behaviors that indicate potential vulnerability. When such indicators of vulnerability are detected, Compliance Assist automatically analyses these interactions to determine if these should be flagged for further review.

By analyzing customer interaction data and surfacing higher-risk cases, reviewers can focus their attention where it matters most. This provides compliance teams with stronger evidence that customer needs are being recognized and addressed, while improving efficiency, reducing cost, and delivering better outcomes.

From an outcomes testing perspective, this enables firms to demonstrate effective oversight and action, monitor and improve outcomes (such as price, product and services), as well as enhance customer understanding.

It also enables them to ask – and answer – some critical questions:

- Are vulnerable customers being identified consistently?
- Did staff respond appropriately to those signals?
- Does the overall journey reflect fair treatment and regulatory alignment?

By embedding these capabilities into compliance monitoring and control testing activities, outcomes testing becomes an evidencable tool for protecting those who need it most.

Impact of the EU Accessibility Act

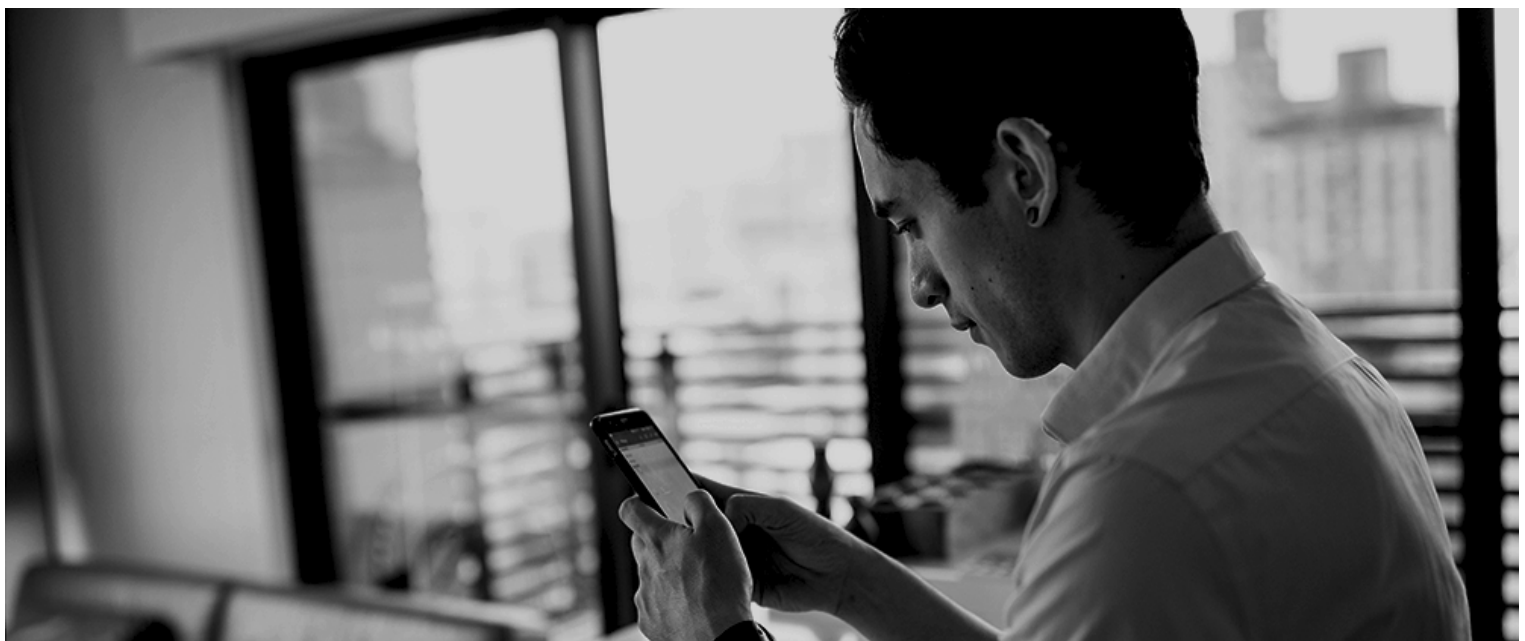
Regulators worldwide are expanding their expectations of fair treatment to include digital accessibility. The European Accessibility Act (EAA) [Directive (EU) 2019/882], which took effect in June 2025, requires financial services providers to ensure that their products and services are accessible to all customers, including those with disabilities or functional impairments. The act has a focus similar to that of UK Consumer Duty and covers everything from digital channels (apps, websites) to customer communications, ATMs, and payment services.

For compliance leaders, this is not just a regulatory requirement but a new dimension of outcomes testing:

- Can customers with visual, hearing, or mobility impairments complete key journeys without barriers?
- Are communications delivered in formats that can be consumed via assistive technologies?
- Do controls ensure accessibility requirements are consistently implemented across customer-facing channels?

AI can play a decisive role in meeting these expectations. For example, our **Compliance Assist** solution could be utilized to analyze whether customer interactions and generated documentation meet accessibility standards – for example, flagging overly complex language or formats that are not screen-reader friendly. The control testing of digital journeys can be further automated by providing end-to-end assurance that controls around accessibility and customer care standards are operating effectively.

By weaving accessibility into outcomes and controls testing, firms can demonstrate not only compliance with regulations but also a genuine commitment to inclusion. For vulnerable customers, this ensures that fair treatment extends beyond conduct and compliance to practical usability. For firms, it transforms accessibility into an area where compliance, customer experience, and innovation intersect.



Controls testing and customer journeys

While outcomes testing evaluates whether customers experience fair treatment, controls testing ensures that the underlying systems and processes are working as intended. These two disciplines are inseparable: if controls do not function effectively, delivery of good outcomes is likely to be compromised.

Within Compliance Assist, modules such as **Controls Genie** and automated customer outcomes testing play a vital role. Controls Genie accelerates the testing lifecycle by generating walkthrough scripts and validating evidence at scale, while the automated customer outcomes testing transforms customer interactions into structured evidence of fair treatment.

Linking outcomes testing with controls testing creates a holistic view of risks and compliance. Consider a customer seeking to restructure a loan during a period of financial difficulty: outcomes testing validates whether that customer received fair treatment. Controls testing confirms whether the policies, scripts, and oversight mechanisms designed to ensure fair treatment were functioning correctly.

Together, these approaches allow firms to evidence that compliance is not only well designed but truly working in practice.

Real-world applications of AI

Beyond testing, AI can also be embedded within processes to strengthen controls and deliver better outcomes in real time. We have already deployed AI solutions in compliance-related areas to deliver measurable improvements, enhancing control effectiveness and regulatory alignment in practice.

For a Tier 1 bank – we implemented AI within the bank's corporate credit-application process to automate manual checks and streamline procedural reviews across the lending journey. The solution reduced operational bottlenecks for front-line teams, improving decision speed and control accuracy.

- This demonstrates the shift from AI as a retrospective monitor to AI as an active safeguard – enhancing efficiency and consistency while ensuring robust, compliant decision-making at scale.

For a UK retail bank – a Compliance Assist solution was implemented to automate the review of internal policies against regulatory requirements, pinpointing misalignments and gaps at speed. The solution analysed suites of policies across multiple regulatory frameworks simultaneously to surface areas of non-compliance and recommend targeted remediation actions.

- This reduced effort in assessing regulation-to-policy alignment by 70% and in identifying in-scope regulations by 80%, accelerating readiness for regulatory review.

Key enablers of success

Lessons learned across our AI-enabled compliance engagements highlight that successful adoption depends as much on governance and integration as on technology. Whether automating policy reviews, streamlining control testing, or embedding outcomes monitoring, several common enablers consistently drive impact:

- **Continuous coverage** – Moving from sample-based reviews to broad monitoring of control environments and customer interactions, enabling continuous assurance rather than point-in-time testing.
- **Outcome-centric design** – Framing compliance testing around measurable customer outcomes, not just control operation, ensuring that AI delivers insights that drive fairness and value for the customer.
- **Automation with accountability** – Using AI to remove repetitive manual effort while embedding human oversight and clear audit trails, ensuring explainability.
- **Contextual responsiveness** – Applying scaled analytics to flag potential customer detriment or control failures as they occur, allowing earlier intervention and resolution.
- **Integration and scalability** – Leveraging platforms such as Compliance Assist to link policy, controls, and customer-journey risk data across the organization, ensuring AI solutions remain sustainable and scalable rather than isolated pilots.

Embedding AI outcomes and controls testing into your organization

Sustainable adoption of AI in outcomes and controls testing requires more than technology. It demands an evolution in organizational culture, governance and skills, and the firms that succeed will be those that combine technological adoption with organizational maturity – embedding AI as part of their compliance DNA.

- **Human oversight must be embedded by design.** Escalation workflows and expert review checkpoints should not be afterthoughts but integral to system architecture. The goal is not to replace compliance professionals but to augment their capabilities. By freeing teams from repetitive tasks, AI creates space for deeper risk analysis and more strategic corrective actions.
- **Auditability must be a non-negotiable standard.** Every AI-driven output – whether a flagged customer vulnerability or a control effectiveness score – must be traceable back to its source data and rationale. Version control, input logging, and decision lineage provide the transparency that regulators require, and the reassurance expected from boards.
- **Upskilling compliance professionals.** Outcomes testing introduces new skills, from prompt engineering to model validation and interpretability. Training programs must ensure that compliance officers can interrogate AI outputs, understand limitations, and exercise informed challenge. In parallel, AI literacy must extend beyond compliance into frontline staff, ensuring that all functions understand how AI supports outcomes.
- **Cultural adoption is critical.** Employees will only trust AI if they see its value in practice. This requires transparent communication, strong leadership messaging, and visible wins. Early pilots should be positioned not as abstract experiments but as practical solutions to pressing compliance challenges, such as monitoring high-risk customer journeys.
- **Integration is essential.** Outcomes and controls testing must not operate as siloed processes. They should connect seamlessly with existing governance, risk, and compliance platforms, risk reporting dashboards, and customer journey analytics. Only then can firms achieve a truly holistic view of risks and control performance.

To find out more about how Compliance Assist and other Capco Smart Suite offerings can be embedded responsibly to meet these and other transformation challenges, please contact our experts.

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About Capco

Capco, a Wipro company, is a global technology and management consultancy shaping change in the financial services and energy industries. For almost 30 years, we have been trusted to help our clients adapt, transform and create long-term value across capital markets, banking, payments, insurance, wealth and asset management, and the energy and utilities sectors. Our deep industry expertise, partnership mindset and award-winning Be Yourself At Work culture are amplified by our strengths in advisory, technology, data and AI innovation. We support our clients to establish clear priorities, connect vision to value, and deliver measurable impact when the stakes are highest.

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