

Consumer Duty Clause Guide

FCA Consumer Duty Requirements and Implementation

Prepared by Fintech Law

Based on 25+ years of cross-border legal and regulatory experience across 33 jurisdictions

Consumer Duty Compliance for Fintech: A Practical Guide

Meeting FCA Requirements in an Evolving Regulatory Landscape

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Introduction: The New Era of Consumer Protection

The Financial Conduct Authority's Consumer Duty represents the most significant shift in consumer protection regulation in a generation. Since its implementation in July 2023 for open products and services, and July 2024 for closed books, the Duty has fundamentally changed how fintech firms must think about their relationship with customers.

For fintech companies—whether you're operating a cryptocurrency exchange, providing payment orchestration services, or building the next generation of digital banking solutions—the Consumer Duty isn't just another compliance checkbox. It's a comprehensive framework that demands a cultural shift: moving from "treating

customers fairly" to actively delivering "good outcomes" for retail customers at every touchpoint.

At Fintech Law, we've been at the forefront of helping fintech firms navigate this complex regulatory terrain. Drawing on over 25 years of expertise in financial services regulation and compliance, including direct work with major payment service providers, cryptocurrency exchanges, and digital asset firms, we understand the unique challenges that innovative financial technology companies face when implementing the Consumer Duty.

This guide will demystify the Consumer Duty's requirements, provide practical guidance on implementation, and demonstrate how fintech firms can turn regulatory compliance into a competitive advantage.

Understanding the Consumer Duty: What Makes It Different?

The Paradigm Shift

The Consumer Duty represents a fundamental departure from the traditional "tick-box" approach to regulation. Instead of prescriptive rules that firms can mechanically follow, the FCA has adopted an outcomes-based framework that requires firms to demonstrate they are actively delivering good consumer outcomes.

The Duty is built on three core principles that firms must integrate into their operations:

- 1. **Act in Good Faith**: Firms must act honestly and with integrity toward retail customers, avoiding practices that exploit customer vulnerabilities or information asymmetries.**

2. **Avoid Foreseeable Harm: Firms must proactively identify and prevent harm to customers, rather than simply reacting to complaints after damage has occurred.**

3. **Enable Customer Objectives: Firms must actively support customers in pursuing their financial goals, rather than merely avoiding obstruction.**

For fintech firms, this means every product feature, every line of code, every customer communication, and every pricing decision must be designed with the customer's interests at its heart. It's not enough to have good intentions—you must be able to evidence that your actions deliver good outcomes.

The Four Consumer Duty Outcomes

The Consumer Duty framework consists of four interconnected outcomes that firms must deliver:

1. Products and Services Outcome

Products and services must be designed to meet the needs, characteristics, and objectives of customers in the target market. This extends throughout the entire product lifecycle, from initial design through to post-sale support and eventual retirement.

2. Price and Value Outcome

Customers must receive fair value, meaning there must be a reasonable relationship between the price paid and the benefits received. This isn't about offering the cheapest products—it's about ensuring that the total cost (including all fees, charges, and non-financial costs) is justified by the benefits delivered.

3. Consumer Understanding Outcome

Communications must be designed to support customer understanding, enabling informed decision-making. Information must be provided at the right time, in a format

customers can understand, and must not exploit information asymmetries or behavioral biases.

4. Consumer Support Outcome

Customer support must meet the needs of customers throughout their relationship with the firm. This includes providing appropriate channels for support, responding effectively to customer needs, and making it easy for customers to make changes or switch products when necessary.

Why Fintech Firms Face Unique Challenges

While the Consumer Duty applies across all financial services sectors, fintech firms face distinct challenges in implementation:

Rapid Innovation vs. Regulatory Compliance

Fintech businesses are built on innovation and speed-to-market. The Consumer Duty requires firms to slow down and carefully consider consumer outcomes at every stage of product development. This can create tension between the agile, fast-moving culture of fintech and the deliberate, evidence-based approach required by the Duty.

At Fintech Law, we've worked with clients including **Avara Inc** (Aave Token) and **CellPoint Digital** to help them build regulatory compliance into their product development pipelines without sacrificing innovation velocity. The key is embedding Consumer Duty considerations into the design process from day one, rather than treating compliance as a final checkpoint.

Complex Technology, Simple Communication

Many fintech products involve sophisticated technology—blockchain protocols, algorithmic trading, payment orchestration layers, or complex data analytics. The Consumer Understanding outcome requires firms to communicate these complexities in ways that average consumers can understand.

This is particularly challenging for firms operating in emerging areas like cryptocurrency, DeFi, or AI-driven financial services, where even explaining the basic mechanics of the service can be daunting. Our work advising firms on digital asset regulation and cryptocurrency exchange licensing has given us deep insight into how to translate technical complexity into clear, compliant customer communications.

Distribution Chains and Regulatory Responsibility

Many fintech firms operate within complex distribution chains, providing services through partners, platforms, or embedded finance arrangements. The Consumer Duty makes it clear that firms cannot outsource their regulatory obligations—both manufacturers and distributors share responsibility for consumer outcomes.

For example, if you're a fintech providing payment services that are distributed through an online merchant's checkout process, you remain responsible for ensuring good consumer outcomes even though the customer may never directly interact with your brand. This requires robust contractual arrangements, careful monitoring, and clear delineation of responsibilities throughout the distribution chain.

Data-Driven Decision Making

Fintech firms typically have access to rich customer data and sophisticated analytics capabilities. The Consumer Duty raises the bar for how this data must be used. Firms are expected to leverage their data capabilities to:

- Monitor consumer outcomes in real-time
- Identify vulnerable customers and tailor support accordingly
- Conduct fair value assessments based on actual customer behavior

- Test communications and measure consumer understanding
- Track and analyze complaint root causes

The FCA has made clear that firms with advanced data capabilities will be held to higher standards in demonstrating compliance with the Duty.

Fair Value Assessments: The Heart of Consumer Duty

What Fair Value Really Means

Fair value is perhaps the most challenging aspect of Consumer Duty implementation for many firms. The FCA defines fair value as existing where "the price a consumer pays for a product or service is reasonable relative to the overall benefits they can expect to receive."

Crucially, fair value is not the same as low price. A premium-priced product can offer fair value if it delivers proportionate benefits. Conversely, a cheap product may not offer fair value if it fails to meet customer needs or includes hidden costs that customers don't understand.

Conducting Effective Fair Value Assessments

The FCA expects firms to undertake comprehensive fair value assessments that consider multiple dimensions:

****Benefits Analysis**:** What does the customer actually receive? This includes not just the core product features, but also aspects like customer service quality, the user experience, security protections, and the time and effort required to use the product.

****Total Cost Assessment**:** What does the customer actually pay? This must capture all costs—upfront fees, ongoing charges, transaction costs, opportunity costs, and non-financial costs like the time and effort required to make decisions or manage the product.

****Target Market Alignment**:** Different customer segments may experience different value propositions from the same product. Fair value assessments must consider whether the product delivers appropriate value to all segments within the target market.

****Market Context**:** How does your pricing compare to similar products in the market? While the FCA doesn't expect firms to be the cheapest, significant pricing anomalies require justification.

****Profit Margins**:** While firms are entitled to make profits, excessive margins may suggest a fair value problem, particularly if they're not justified by commensurate benefits or investment in service quality.

Common Fair Value Pitfalls

In our work with fintech clients, we've identified several common mistakes firms make in their fair value assessments:

****Over-reliance on Internal Benchmarking**:** Comparing your product only to other products in your own portfolio is necessary but insufficient. External market benchmarking is essential to demonstrate fair value.

****Ignoring Non-Financial Costs**:** Many firms focus solely on monetary costs and benefits, overlooking factors like complexity, time to decision, or difficulty switching providers—all of which affect the value customers receive.

****Generic Assessments**:** Fair value assessments that treat all customers as a homogenous group often miss differentiated outcomes for vulnerable customers or those with specific needs.

****Lack of Actionable Outcomes**:** Fair value assessments must drive decision-making. If your assessment identifies fair value concerns but doesn't lead to concrete actions to address them, you haven't met your obligations under the Duty.

Practical Implementation: The Fintech Law Approach

When Fintech Law supports clients with fair value assessments, we employ a structured methodology:

- 1. **Product Categorization**:** We help firms group products and services appropriately, ensuring that products with distinct features, target markets, or fee structures receive separate fair value assessments.
- 2. **Data-Driven Analysis**:** We work with firms to leverage their data capabilities, analyzing actual customer outcomes rather than theoretical projections.
- 3. **Stakeholder Workshops**:** We facilitate cross-functional workshops bringing together product, pricing, customer service, and compliance teams to develop holistic fair value perspectives.
- 4. **Remediation Planning**:** Where fair value concerns are identified, we help firms develop practical, commercially viable remediation strategies that address the root causes.
- 5. **Evidence Documentation**:** We ensure firms have robust documentation that demonstrates their fair value assessments are comprehensive, evidence-based, and lead to meaningful action.

This approach has enabled clients like those in our payment services and cryptocurrency exchange portfolios to confidently demonstrate compliance with the price and value outcome while maintaining commercially viable business models.

Consumer Understanding: Communicating Complexity Clearly

The Challenge of Financial Services Communication

Financial services has long struggled with a fundamental paradox: the products and services that require the most careful decision-making are often the most difficult to explain clearly. For fintech firms, this challenge is compounded by technical complexity and the novelty of many fintech products.

The Consumer Understanding outcome requires firms to bridge this gap. Communications must:

- Meet the information needs of customers
- Be likely to be understood by the intended recipients
- Enable and support customers to make effective, timely, and informed decisions
- Be fair, clear, and not misleading
- Not exploit customers' information asymmetries or behavioral biases

The "Put Yourself in Their Shoes" Test

The FCA has suggested a simple but powerful test for assessing whether communications support consumer understanding: put yourself in your customers' shoes. Would you, approaching the communication without your insider knowledge, be able to understand the product, its costs and benefits, and make an informed decision?

This test is particularly revealing for fintech firms. What seems straightforward to a team that breathes blockchain technology or payment protocols daily may be incomprehensible to a typical consumer.

Practical Strategies for Consumer Understanding

****Plain Language, Not Jargon**:** Technical terms should be avoided wherever possible. Where technical language is necessary, it must be explained in plain English. This doesn't mean "dumbing down"—it means respecting that customers shouldn't need to be technical experts to understand what they're buying.

****Appropriate Timing**:** Information must be provided when customers need it to make decisions, not buried in lengthy terms and conditions that customers receive after they've already committed.

****Layered Information**:** Use a layered approach that gives customers summary information upfront, with the ability to access more detailed information if they want it. This respects that different customers have different information needs and processing capabilities.

****Visual Communication**:** Where appropriate, use visual aids—infographics, diagrams, videos—to supplement text-based communications. Many customers find visual information easier to process, particularly for complex topics.

****Testing and Feedback**:** The FCA expects firms to test their communications with actual customers and gather feedback on whether communications are achieving their intended purpose. This should be proportionate to the firm's size and resources, but even small firms should be gathering customer feedback on key communications.

Tailoring for Vulnerability

The Consumer Understanding outcome requires particular care when communicating with vulnerable customers. Vulnerability can take many forms—from life events like

bereavement or serious illness, to personal characteristics like low financial capability or cognitive decline, to economic circumstances like over-indebtedness.

Firms must:

- Have processes to identify customers with characteristics of vulnerability
- Tailor communications to vulnerable customers' needs
- Provide additional support where necessary
- Monitor whether vulnerable customers are achieving good outcomes

In our work advising clients on Consumer Duty implementation, we've seen that firms with strong data capabilities can use behavioral analytics to identify customers who may be struggling to understand products or make effective decisions, allowing for proactive intervention.

Consumer Support: Being There When It Matters

Support Throughout the Customer Lifecycle

The Consumer Support outcome recognizes that customer needs evolve throughout their relationship with a firm. Support that's appropriate at onboarding may be insufficient later in the customer journey. The FCA expects firms to:

- Provide support channels that meet customer needs
- Ensure support is accessible to all customers, including those with characteristics of vulnerability
- Enable customers to act in line with their financial objectives

- Make it easy for customers to make changes or switch products when appropriate

The Digital Support Challenge

For digital-first fintech firms, providing appropriate support can be challenging. Many fintech business models rely on low-cost, automated customer journeys with minimal human intervention. While this can offer significant benefits—24/7 availability, instant responses to simple queries, scalability—it can also create risks of poor customer outcomes when customers need more complex support.

The Consumer Duty doesn't mandate any particular support channel, but it does require firms to ensure their support model actually meets customer needs. This means:

****Channel Appropriateness**:** Are the support channels you offer appropriate for your customer base? If your customers are predominantly older or less digitally confident, an app-only support model may not meet their needs.

****Routing and Escalation**:** Do you have effective processes to identify when automated support isn't sufficient and route customers to human support? Can customers easily escalate issues that require human judgment?

****Staff Training**:** Are your customer-facing staff (whether in-house or outsourced) trained to deliver Consumer Duty standards? Do they have the authority and tools to resolve issues effectively?

****Complaint Handling**:** Do you have robust processes to identify complaint root causes and make systemic improvements? The FCA expects firms to view complaints as valuable data about where consumer outcomes may be falling short.

Supporting Switching and Product Changes

A particularly important aspect of consumer support is enabling customers to switch products or providers when that's in their interests. Fintech firms must not create unnecessary friction that makes it difficult for customers to leave or change products.

This can create tension with commercial objectives around customer retention, but the Duty is clear: customer outcomes take priority. Firms must:

- Make switching processes clear and straightforward
- Not impose unnecessary barriers or penalties
- Provide clear information about what customers will lose or gain from switching
- Ensure that retention activities don't exploit customer inertia or misunderstanding

Products and Services: Designing for Good Outcomes

Target Market Identification

The foundation of the Products and Services outcome is ensuring that products are designed to meet the needs of customers in the identified target market. This requires firms to carefully consider:

****Who is the product for?****: What customer needs, objectives, and characteristics define the target market? Be as specific as possible—a target market of "all retail customers" is rarely appropriate.

****Who is the product not for?****: Are there customer groups for whom the product is clearly unsuitable? The FCA expects firms to identify negative target markets and have controls to prevent distribution to these customers.

****Product Features and Target Market Alignment**:** Do the product's features actually address the needs of the target market? Are there features that create unnecessary complexity or cost for the target market?

Distribution Strategy and Monitoring

Particularly important for fintech firms operating through distribution partners is ensuring that products are actually being distributed to the target market. This requires:

- Clear communication of target markets to distributors
- Contractual obligations on distributors to distribute appropriately
- Regular monitoring of actual distribution patterns
- Investigation and remediation where distribution drift is identified

In our work supporting ****CellPoint Digital**** on payment services and orchestration matters, we helped develop robust distribution monitoring frameworks that balanced commercial relationships with regulatory obligations, ensuring that payment solutions were being offered to appropriate customer segments.

Product Governance Throughout the Lifecycle

The Products and Services outcome applies throughout the product lifecycle, not just at launch. Firms must:

****Pre-Launch**:** Conduct thorough product design reviews considering all four Consumer Duty outcomes. This should be embedded in product development processes, not treated as a final sign-off.

****Launch**:** Have appropriate controls to ensure initial distribution aligns with the target market. Monitor early performance to identify any unexpected customer outcomes.

****Ongoing**:** Regularly review whether products continue to meet customer needs and deliver good outcomes. Market conditions, customer behavior, and competitive dynamics can all change in ways that affect whether a product remains appropriate.

****Product Changes**:** When products are modified, assess whether the changes affect consumer outcomes and whether the target market remains appropriate.

****Wind-Down**:** When products are withdrawn, ensure customers are treated fairly and supported in finding alternative arrangements that meet their needs.

Implementing Consumer Duty: A Practical Roadmap

Phase 1: Foundation (Months 1-3)

****Leadership Commitment**:** Consumer Duty implementation must be board-sponsored and led from the top. The FCA expects boards to take ownership of Consumer Duty, challenging management on implementation plans and monitoring outcomes.

****Gap Analysis**:** Conduct a comprehensive assessment of current practices against Consumer Duty requirements. This should cover all four outcomes and consider the full customer journey.

****Governance Framework**:** Establish clear governance arrangements for Consumer Duty, including:

- Allocation of responsibilities (including Senior Manager Certification Regime allocations)
- Reporting lines and escalation procedures
- Management information requirements
- Oversight and challenge mechanisms

****Data and MI Strategy**:** Identify what data and management information you need to monitor consumer outcomes and support decision-making. Plan any enhancements to data infrastructure.

Phase 2: Deep Dive (Months 4-6)

****Fair Value Assessments**:** Conduct comprehensive fair value assessments for all products and services. This is often the most time-intensive aspect of Consumer Duty implementation.

****Target Market Reviews**:** Review and document target markets for all products. Ensure negative target markets are identified and distribution controls are appropriate.

****Communications Review**:** Audit customer-facing communications against the Consumer Understanding outcome. Prioritize the most important customer communications for review and testing.

****Support Model Assessment**:** Evaluate whether your customer support model is meeting customer needs throughout their journey. Identify any gaps or enhancements needed.

****Distribution Chain Mapping**:** For firms operating through distributors, map the full distribution chain and assess how responsibilities for Consumer Duty outcomes are allocated.

Phase 3: Remediation and Enhancement (Months 7-12)

****Action Plans**:** Develop and implement action plans to address gaps identified in your assessments. Prioritize actions based on risk of customer harm.

****Product Modifications**:** Make necessary changes to products that are not delivering fair value or are not meeting customer needs.

****Process Redesign**:** Embed Consumer Duty considerations into business-as-usual processes for product development, pricing decisions, communications approval, and customer support.

****Training and Culture**:** Roll out comprehensive training on Consumer Duty for all staff. Focus particularly on embedding the mindset shift from compliance with rules to delivery of good outcomes.

****Testing Program**:** Implement a testing program for customer communications and key customer journeys.

Phase 4: Embedding and Monitoring (Ongoing)

****Outcomes Monitoring**:** Implement ongoing monitoring of consumer outcomes using the data and MI frameworks established earlier. Key metrics might include:

- Customer satisfaction and Net Promoter Scores
- Product usage patterns and engagement metrics
- Complaint volumes and root cause analysis
- Switching rates and friction points
- Outcomes for vulnerable customer segments

****Regular Reviews**:** Conduct regular reviews of fair value assessments, target market appropriateness, and effectiveness of communications and support.

****Board Reporting**:** Provide regular reports to the board on consumer outcomes, including both positive indicators and areas of concern.

****Continuous Improvement**:** Use insights from outcomes monitoring to drive continuous improvement in products, services, processes, and communications.

How Fintech Law Can Help

At Fintech Law, we've been supporting financial services and fintech firms with complex regulatory challenges for over 25 years. Our approach to Consumer Duty support is practical, commercial, and grounded in deep technical expertise.

Our Consumer Duty Services

****Strategic Advisory**:** We work with your leadership team and board to develop a comprehensive Consumer Duty strategy that aligns with your business objectives while meeting regulatory expectations.

****Fair Value Assessment Support**:** We provide end-to-end support for fair value assessments, from methodology design through to remediation planning. Our experience spans payment services, cryptocurrency exchanges, lending platforms, and traditional financial services.

****Policy Development**:** We draft the full suite of Consumer Duty policies and procedures, including fair value frameworks, target market methodologies, communications standards, and vulnerable customer policies.

****Distribution Agreements**:** We draft and negotiate distribution agreements that appropriately allocate Consumer Duty responsibilities and obligations throughout the distribution chain.

****Training and Culture**:** We deliver tailored training programs that help embed Consumer Duty thinking throughout your organization, from board level to front-line staff.

****Regulatory Liaison**:** We support firms in their engagement with the FCA, including responding to regulatory queries, supporting supervisory visits, and representing firms in enforcement matters where Consumer Duty issues arise.

Recent Client Success Stories

****Avara Inc (Aave Token)**:** We were instructed as external counsel to the Head of Compliance to support the firm's FCA VASP licence application and Consumer Duty implementation. Our work included:

- Drafting the full suite of regulatory policies for their crypto/fiat exchange
- Developing end-to-end data flow mapping for regulatory compliance
- Building their first Data Protection Impact Assessment (DPIA)
- Advising on SM&CR obligations for senior management
- Creating comprehensive Standard Operating Procedures (SOPs)

****CellPoint Digital**:** Supporting the General Counsel across legal, commercial, and regulatory matters related to payment services and orchestration, our Consumer Duty work included:

- Advising on fair value considerations for payment orchestration services
- Reviewing and enhancing customer communications to meet Consumer Understanding standards
- Developing distribution chain agreements that appropriately allocate Consumer Duty responsibilities
- Supporting cross-border compliance with PSD2, EMD2, and Consumer Duty requirements

****B2B Fintech Payment Platform**:** For a business-to-business fintech client, we:

- Conducted a Consumer Duty gap analysis identifying service gaps in their customer journey

- Designed solutions to ensure customers retained appropriate access to support after account closure
- Developed documentation including DSAR procedures, Breach Response Policies, and Vendor Risk frameworks
- Ensured their Consumer Duty framework was appropriate for their B2B model while protecting end users

Why Choose Fintech Law?

****Deep Regulatory Expertise**:** With over 25 years advising on financial services regulation—including FCA, PSD2, MiCA, GDPR, MiFID II, and cryptocurrency regulation—we understand how Consumer Duty fits within the broader regulatory landscape.

****Fintech Specialization**:** Unlike generalist law firms, we specialize in fintech, digital assets, and payment services. We understand the technical complexities of your business and can provide advice that's both legally sound and technically informed.

****Practical and Commercial**:** We pride ourselves on providing advice that's practical and commercially viable. We understand that fintech firms need to balance regulatory compliance with commercial success, and we work to find solutions that achieve both objectives.

****International Perspective**:** Having worked in the UK, Washington DC, and Qatar, and advised clients across multiple jurisdictions, we bring a genuinely international perspective to regulatory challenges. This is particularly valuable for fintech firms with cross-border operations.

****Proven Track Record**:** Our track record includes leading the Brexit restructuring for Lloyds Banking Group, advising HSBC Bank on fintech operations and ring-fenced bank implementation, and supporting numerous payment service providers, cryptocurrency exchanges, and digital asset firms through complex regulatory challenges.

The Evolving Consumer Duty Landscape

Recent Developments

The Consumer Duty landscape continues to evolve. Recent developments include:

****Scope Reviews**:** In October 2025, the FCA announced potential changes to the scope of Consumer Duty, potentially exempting non-UK customers and introducing a higher threshold for sophisticated clients. While these changes may simplify compliance for some firms, the core Consumer Duty obligations remain.

****Cryptoasset Application**:** The FCA is consulting on how Consumer Duty should apply to cryptoasset firms as they come within the regulatory perimeter. For firms operating in digital assets, this represents a significant development that will shape the future regulatory landscape.

****Focus Areas**:** The FCA has published its Consumer Duty focus areas for 2025/2026, highlighting priority sectors including retail banking, consumer investments, and insurance. For payment services and fintech firms, the FCA's focus on price and value outcomes in cash savings and payment services is particularly relevant.

****Good and Poor Practice**:** The FCA continues to publish reviews highlighting good and poor practice in Consumer Duty implementation. These provide valuable insights into regulatory expectations and common pitfalls.

Looking Ahead: Consumer Duty in 2025 and Beyond

The Consumer Duty is not "once and done." The FCA has made clear that Consumer Duty is a continuous journey, not a destination. Firms should expect:

****Increased Scrutiny**:** As Consumer Duty becomes business as usual, the FCA will shift from implementation support to supervisory enforcement. Firms that have taken a superficial approach to Consumer Duty implementation should expect challenge.

****Sector-Specific Guidance**:** The FCA is developing additional guidance for specific sectors, including cryptoassets, payments, and embedded finance. This will provide more clarity on how Consumer Duty applies in these contexts.

****Integration with Other Initiatives**:** Consumer Duty will increasingly be integrated with other FCA priorities, including operational resilience (DORA), financial crime prevention, and data protection (working with the ICO).

****Technology and Data**:** Expect increased FCA focus on how firms are using technology and data to monitor and improve consumer outcomes. Firms with strong data capabilities will be expected to demonstrate how they're leveraging these capabilities for consumer benefit.

Conclusion: Turning Compliance into Competitive Advantage

While Consumer Duty implementation requires significant effort and investment, it also presents an opportunity. Firms that genuinely embrace the Consumer Duty mindset—putting customers at the heart of everything they do—are likely to see benefits beyond regulatory compliance:

****Stronger Customer Relationships**:** Customers who receive fair value, understand your products, and receive excellent support are more likely to be loyal, engaged, and willing to recommend your services.

****Reduced Regulatory Risk**:** Firms with robust Consumer Duty frameworks are better positioned to avoid regulatory intervention, enforcement action, and the reputational damage that comes with regulatory censure.

****Operational Efficiency**:** The process of implementing Consumer Duty often reveals operational inefficiencies and opportunities for improvement that have commercial as well as regulatory benefits.

****Innovation Advantage**:** Embedding Consumer Duty thinking into product development can lead to better products that more effectively meet customer needs, providing a competitive advantage.

****Cultural Strength**:** A culture genuinely focused on delivering good customer outcomes tends to be more resilient, adaptive, and attractive to top talent.

At Fintech Law, we believe that the firms that will thrive in the Consumer Duty era are those that see it not as a burden to be minimized, but as an opportunity to build better businesses that genuinely serve their customers' interests.

If you're navigating Consumer Duty implementation, facing FCA scrutiny on Consumer Duty matters, or simply want to ensure your approach is as robust as it can be, we're here to help. With deep expertise in fintech, digital assets, payment services, and financial services regulation, we can provide the practical, commercial, and technically informed advice you need.

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For over 25 years, Fintech Law has been supporting financial services and fintech firms through complex regulatory challenges. From cryptocurrency exchanges to payment service providers, from challenger banks to established financial institutions, we bring deep technical expertise and practical commercial insight to every engagement.

Whether you're seeking support with Consumer Duty implementation, FCA authorization, digital asset regulation, payment services compliance, or any aspect of financial services regulation, we're ready to help you navigate the complexity and build a sustainable path forward.

This article provides general information and commentary on Consumer Duty requirements and should not be relied upon as legal advice for specific situations. Firms should seek tailored advice based on their particular circumstances. The regulatory landscape is continuously evolving, and firms should ensure they remain current with the latest FCA guidance and requirements.

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