

## Executive Summary

UK challenger banks face increasing scrutiny under the FCA Consumer Duty, requiring measurable proof that customers understand what they are agreeing to. Ascertia's digital trust solutions — SigningHub and ADSS Server — enable compliant, secure, and user-friendly consent journeys that combine legal enforceability with seamless mobile onboarding experiences.

## The Challenge

Challenger banks — the new generation of UK-based, technology-led financial institutions — have transformed banking through mobile-first innovation, rapid onboarding, and lower operational costs. However, they now face growing regulatory pressure under the Financial Conduct Authority's (FCA) Consumer Duty (PS22/9), which came into effect on 31 July 2023.

Many banks rely on simple 'click-to-accept' confirmations during app-based onboarding. This approach, though legally acceptable as an electronic signature under English law, fails to demonstrate that customers have genuinely read and understood the terms and conditions (Ts&Cs).

Without verifiable evidence of informed consent, banks risk regulatory non-compliance, reputational damage, and costly remediation. In an environment where trust, transparency, and fairness are paramount, customer understanding is no longer optional — it is a compliance obligation.

## Regulatory Landscape

The FCA's Consumer Duty introduces a higher standard of care, focusing on outcomes rather than processes. It requires financial institutions to demonstrate that they are delivering 'good outcomes' for retail customers — particularly ensuring that consumers understand the products and services they use.

This means institutions must evidence that customers have received, read, and comprehended key disclosures and terms. A passive acceptance model — such as tapping 'I agree' — is no longer sufficient. Challenger banks must prove meaningful engagement with Ts&Cs and ensure this evidence is audit-ready.

## Easy to use Workflow and Trust Framework

Ascertia provides the best of both worlds: simple-to-follow workflows guide users through each step of the agreement, where they are required to sign their name with a strong cryptographic signature that can be applied by the system at the end of the process to evidence the signature process. Combined with a comprehensive evidence report, this provides banks with all they need to streamline the onboarding process and couple a great and secure user experience.

Digital signatures derive trust through a combination of strong cryptographic protection and reliable validation processes. Ascertia's trust framework ensures that each document's authenticity and integrity remain provable for years after signing.

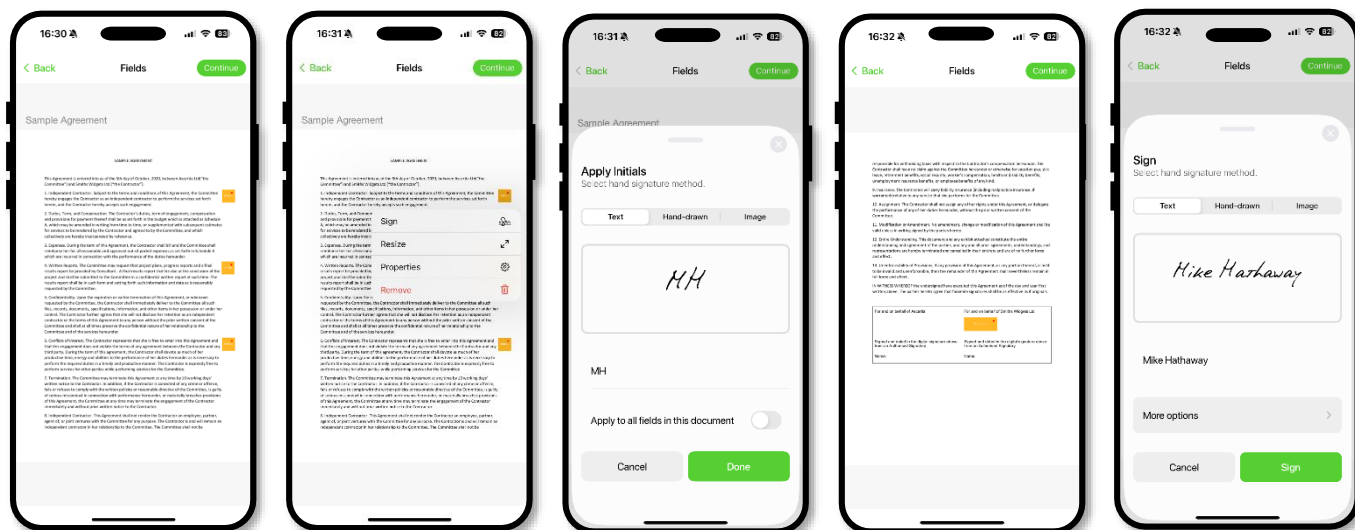
The Ascertia solution provides banks with regulatory-grade assurance for compliance, audits, and dispute resolution.

## The Ascertia Solution: SigningHub + ADSS Server

Ascertia's SigningHub and ADSS Server work together to help banks meet the FCA's expectations without compromising the speed and convenience of digital onboarding.

- Replace 'click-to-accept' with a structured e-signature workflow that embeds informed consent.
- Insert signature or initial fields within key sections of agreements to confirm user acknowledgment.
- Capture digital audit trails that record every action, timestamp, and signer identity.
- Apply a bank-level digital seal (eSeal) via ADSS Server, ensuring the document's integrity, authenticity, and brand value.

Integration is flexible — SigningHub can be embedded directly in mobile or web journeys using SDK or iFrame integration, while ADSS Server operates behind the scenes to manage secure signing keys, timestamps, and long-term validation (LTV) evidence.



## Deployment and Integration

SigningHub and ADSS Server can be deployed in cloud, hybrid, or on-premises models to meet varied compliance, data residency, and performance requirements. Integration options include SDKs, APIs, and automation workflows such as watched folders and email-based signing services.

This modular architecture enables banks to start with compliance-critical use cases, like onboarding and account agreements, and scale to broader workflows including statements, loan documents, and internal approvals.

## Compliance Mapping

### FCA Consumer Duty Requirement

- Ensure consumer understanding
- Demonstrate evidence of engagement
- Maintain long-term record integrity
- Support fair treatment and transparency

### How Ascertia Helps

- Interactive, structured e-signature workflows
- Audit trails with timestamps and digital proof of consent
- ADSS Server Long-Term Validation (LTV) and timestamping
- Secure and verifiable digital approval process

## Business Value

By adopting Ascertia's digital trust solutions, challenger banks can achieve both compliance and competitive advantage.

- **Regulatory Compliance:** Demonstrates adherence to FCA Consumer Duty's 'consumer understanding outcome'.
- **Customer Trust:** Reinforces fairness, transparency, and accountability.
- **Fraud Prevention:** Prevents unauthorized account setup or false approvals.
- **Audit Efficiency:** Produces tamper-evident, timestamped evidence of consent.
- **Operational Savings:** Reduces paper, manual verification, and complaint-handling costs.

## Why Ascertia?

Ascertia is a global leader in digital trust, providing technology that secures millions of documents and transactions daily. Our solutions are trusted by governments, financial institutions, and enterprises to protect data integrity, enable compliance, and establish lasting trust.

- Proven expertise in PKI, e-signature, and digital trust services.
- Flexible, standards-based technology (ETSI, eIDAS, ISO 19005/PDF-A).
- Over two decades of trusted deployments across regulated sectors.

## Next Steps

To learn how Ascertia can help you achieve FCA Consumer Duty compliance while maintaining a seamless digital experience, [info@ascertia.com](mailto:info@ascertia.com)

## About Ascertia

Ascertia provides digital trust for people, devices, data and documents for everybody from individuals to Enterprises and Governments. Ascertia's PKI and digital signature technologies serve a global customer base and partner network via direct and indirect sales channels.

## For more info

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