Enterprise identity and fraud controls

A practical guide to improving onboarding, strengthening financial crime controls and proving value in a pilot.

The CFO HQ in partnership with Ondato

For finance, risk, product and operations leaders



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A note from Arthur Ngoka

When you change how customers are onboarded, your board needs confidence in three things. Genuine applicants can complete the journey, risk teams can explain the decisions, and the investment makes sense at the volumes you expect.

Our work with Ondato brings identity verification and screening technology together with the financial case and operating controls needed to use it well. We start with one journey, agree the evidence that would justify a wider rollout and give your teams a clear decision at the end of the pilot.

Arthur Ngoka

Chief Executive Officer, The CFO HQ

How the partnership works

The CFO HQ combines Ondato’s advanced verification and screening technology with the operating design needed to run those controls at scale.

ADVISORY AND DELIVERY

The CFO HQ

Develops the business case, designs workflows and controls, coordinates implementation and sets up reporting for leadership.

TECHNOLOGY

Ondato

Provides technology for individual and business verification, AML screening and ongoing monitoring. Coverage and integration are confirmed during scoping.

POLICY AND DECISIONS

Your organisation

Sets risk appetite, owns policy and decisions, and approves data handling, acceptance criteria and rollout.

How we plan capacity

We size the team around markets, forecast volumes, exception rates and supported hours. Discovery establishes the named leads and coverage.

Outputs you can take to committee

The work produces artefacts for investment approval, operational readiness and assurance.

Output	What it covers	Who uses it
Baseline and opportunity brief	Journey, current costs, control gaps and the priority cohort.	Sponsor, Finance and Product
Workflow and controls design	Check sequence, routes for exceptions, decision owners and evidence retained.	Compliance, Operations and Technology
Pilot decision pack	Results against agreed thresholds, commercial scenarios and a decision to proceed, revise or stop.	Steering group and Risk
Mobilisation and handover plan	Rollout sequence, training, service ownership, incident procedures and review cadence.	Operations, IT and procurement

Where the work applies

Start with a defined journey and select checks and delivery options around your policy.

Client scenario	Work we can scope	Decision to improve
Bank or lender	Individual and business verification, beneficial ownership evidence and risk-based review.	Which applications can proceed and which need review?
Insurer	Verification at selected points in quote, policy or claims journeys, with referral rules.	Where does an identity check change the decision?
Public body	Identity proofing for a service, with assisted routes and clear exception ownership.	Can eligible users access services and can staff explain decisions?
Cross-sector monitoring	Sanctions and politically exposed person screening, alert routing and ongoing monitoring as scoped.	Who investigates a match, by when and with what evidence?

Four decisions from discovery to rollout

The sponsor, compliance lead and technology owner agree the evidence required at each stage.

01 / DISCOVER

Choose the journey

Map volumes, drop-off, review queues and existing controls. Agree the cohort and owners.

02 / DESIGN

Approve the controls

Confirm checks, exceptions, data flows and the integration route. Set pilot thresholds and stop rules.

03 / PILOT

Decide whether to scale

Compare with baseline and inspect decision records. Review approved test cases and unresolved issues.

04 / RELEASE

Accept operational handover

Release in stages. Train reviewers and confirm reporting, escalation and rollback readiness.

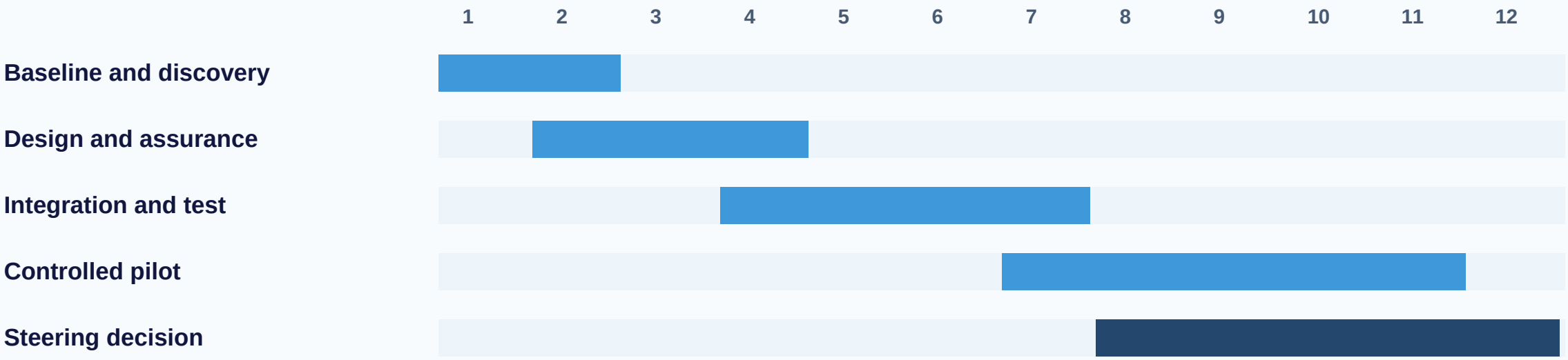
Implementation routes

A hosted flow can simplify integration. An API or SDK can embed checks in your journey. Agree reviewer access and case handling separately.

TIMELINE

Plan for an 8–12 week pilot decision

Illustrative for one journey and a limited cohort. Scope, procurement and readiness determine the actual dates.



Before the clock starts

Name the sponsor and owners, agree access to baseline data and confirm a test environment. Plan production rollout after the pilot decision.

Measure value alongside control quality

Agree a comparison cohort, denominators and minimum evidence before the first pilot case.

Measure	What to compare	Decision it supports
Customer completion	Completed journeys ÷ eligible starts. Break out market, channel and document type.	Where did onboarding improve or worsen?
Review effort	Review referrals ÷ submitted cases, plus handling time and queue ageing.	Can the team support peak demand?
Control quality	Evidence completeness, sampled overrides and outcomes on agreed test cases.	Can decisions be explained and exceptions handled?
Cost per completion	Vendor and allocated handling costs ÷ completed checks. Track setup separately.	Does the business case still work at expected volumes?

Illustrative manual review savings

60,000 annual checks × 5 percentage points fewer reviews × 12 minutes × £22/hour = £13,200 annual staff capacity before fees and setup.

Agree fallback routes before go-live

Confirm owners, trigger thresholds and delegated authority before the pilot starts.

Risk	Response and contingency	Accountable lead
Genuine applicants blocked	Monitor declines and abandonment by cohort. Offer assisted review and pause expansion if limits are breached.	Product / Operations
Identity fraud or missed alerts	Review agreed test cases and flagged outcomes. Pause affected routing and refer cases to trained analysts.	Fraud / Compliance
Supplier or integration outage	Agree service targets, alerting and an approved fallback. Reconcile queued cases before restarting.	Technology / Service
Privacy or retention gaps	Approve data flows, access and retention ahead of live use. Hold the release if an approval is missing.	Privacy / Security
Backlogs or weak economics	Track queue age and cost per completion. Add trained cover, narrow the cohort or revisit workflow design.	Operations / Finance

What risk committees are testing now

Use these developments to sharpen the pilot questions and procurement evidence.

FRAUD

AI-enabled impersonation

FinCEN has highlighted suspected deepfake use in fraud reporting. Ask how suspected impersonation is referred and how findings are recorded.

EVIDENCE

Remote onboarding assurance

EBA guidance for institutions in scope addresses suitability, testing and oversight of remote onboarding. Ask who signs off evidence and reviews it over time.

OPERATIONS

Checks beyond the first decision

Ongoing monitoring can surface changes after onboarding. Establish who owns alerts, how quickly they are reviewed and how closure is evidenced.

FinCEN · Deepfake fraud alert

EBA · Remote onboarding guidelines

Ondato · Platform documentation

Do’s and don’ts

Use these checks in the design review and again before releasing to a wider cohort.

Do	Avoid
Segment outcomes by channel, customer type and market.	Approving rollout using a blended pass rate alone.
Design an assisted route and assign an owner to exceptions.	Leaving failed checks in queues without clear escalation.
Include retries, referrals, staffing and integration in the economics.	Basing the business case on an advertised unit check price.
Test evidence retrieval, overrides and the fallback process.	Treating a successful demo as production acceptance.
Set production approval criteria with Finance, Compliance and Technology.	Widening scope before the control owner signs off.

Questions buyers ask before committing

Question	Answer
Can you work with our existing journey?	Yes. We assess hosted, embedded and reviewer-led options around your platform, teams and markets.
Can we start with one product or market?	Yes. A bounded pilot gives teams evidence before approving wider coverage.
Who owns policy and decisions?	Your organisation owns its policies and risk decisions. We document referrals, overrides and accountability.
How do you handle data and assurance?	We review data flows, hosting, retention, access and contract roles with your privacy and security teams.
How are fees and contracting agreed?	Scope, check mix, markets, volume, integration and support drive the proposal. We confirm the commercial route before delivery.

Let’s review one journey together

Bring one onboarding or verification journey, a rough monthly volume and the decision you need to make. We’ll use the first discussion to identify what is worth testing and who should be involved.

Discuss an onboarding pilot

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