

Question	Minimum evidence	Owner
What improves?	Baseline from sampled operational records, collection period, sample size and exclusions.	Business owner
Why AI?	Rules, workflow redesign and manual options tested or costed on the same task.	Product lead
Who can be harmed?	Affected parties, foreseeable misuse and downstream decision map.	Risk and compliance
What counts as success?	Business outcome, quality, latency, cost and safety metrics with method and proposed gates.	Product and analytics

Running example A fictional reconciliation assistant

Vale Asset Services receives 1,000 daily breaks between portfolio accounting and a custodian feed. Analysts manually group likely duplicate or timing-related breaks, then investigate exceptions. A proposed assistant suggests a reason code and supporting source rows; analysts decide whether to accept and close a break. It cannot post journal entries, change valuations or communicate to clients. The example baseline of 14 minutes per break and 88% analyst agreement is hypothetical until Vale measures it in a representative sample.

2 Map the operating model

Name the accountable business owner before procurement. Map the handoffs from front office exposure and decisions, through middle-office data and risk controls, to back-office reconciliation and exception closure. Never infer that a user's click equals meaningful review: describe what the reviewer sees, what they verify and how an override is recorded.

Role	Decision or control	Evidence artifact
Product lead	Use case, alternatives, acceptance criteria, release scope	Feature spec and decision record
Business operations	Exception ownership and manual process	Runbook and sampled outcomes
Data owner	Rights, quality, lineage, retention	Data inventory and assessment
Model risk / independent reviewer	Risk tier and validation method under firm policy	Tier decision and validation memo
Technology and security	Integration, access, logging, recovery	Architecture and test reports
Legal, compliance and privacy	Applicable obligations and legal basis where relevant	Jurisdiction and privacy triage
Executive sponsor	Residual risk and resourcing decisions within authority	Signed decision in system of record

population with a contemporaneous manual baseline, and count all review time, correction effort, fallbacks and vendor failures. A threshold is a proposed local design parameter, never a generic industry mandate.

Illustrative Vale gates: no automatic posting; every closure requires analyst confirmation; zero unreviewed high-severity valuation-impacting breaks in a designated test suite; no critical access-control findings; median handling time below the agreed baseline in the pilot; and segment results and upper confidence bounds for serious error reviewed by model risk. Vale would define sample size and statistical decision rules before the pilot. These figures are example criteria, not verified performance.

6 Use stage gates as decisions

Gate	What the decision permits	Evidence and hard stop
A Discovery to design	Fund the design investigation	Baseline, sponsor, alternatives, initial materiality and jurisdiction screen.
B Design to build	Build against a bounded spec	Feature spec, data owner, risk tier, intended and prohibited use, control design, metrics, privacy screen and conditional items.
C Build to pilot	Expose a defined cohort to tested workflow	Held-out and edge-case results, security and privacy tests, human review, rollback drill, trained users and monitored pilot plan.
D Pilot to production	Expand to authorised production scope	Pilot outcomes, incident disposition, independent validation if required, live alerts, ownership, residual risk decision and review date.

For each gate, record the approving authority, decision time, evidence links, explicit conditions, owner, deadline and criterion for reopening. A conditional approval is valid only if the firm’s governance policy allows that condition. A condition cannot substitute for a legal obligation or required validation. Record the decision in the organisation’s system of record as well as the checklist.

7 Regulatory applicability triage

As checked 19 September 2026. This is a routing guide for specialist review, not legal interpretation. Regulation depends on the regulated entity, activity, customer, data, jurisdictions, role in the AI value chain and changes to law. Have counsel or compliance record applies / does not apply / unresolved, the specific provision, evidence and review date.

Framework	Triage prompt	Official source
FCA rules and Consumer Duty	Is the firm FCA-authorised? Which activity and customer outcome could be affected? FCA describes applying existing rules to AI; do not assert a standalone blanket AI approval.	FCA AI approach [1]

9 One-page decision record to copy

Use case / bounded decision: _____

Entity, geography and users: _____

Business baseline and measurement period: _____

Alternatives considered and comparative evidence:

Data owner, data rights and quality issues: _____

Model or vendor ID, version and change notice: _____

Risk tier and independent-review requirement: _____

Jurisdiction conclusions with legal owner and source:

Pilot acceptance criteria, sample and severe-error stop rule:

Manual fallback, rollback owner and recovery test:

Residual risks, conditions, owners and due dates: _____

Gate decision, authority, date and system-of-record link:

10 Example decision narrative

Vale's product lead proposes a supervised reason-code assistant for three custodians, limited to listed equities and cash. A rules baseline resolves common timing breaks; the assistant covers ambiguous cases only. The back-office analyst must inspect linked source rows and choose a reason code. The model has read-only access and cannot post or release balances. A documented dry run shows that some break categories have few independent labels; the product lead therefore proposes a shadow phase rather than claiming launch readiness. Gate B may approve a limited build if the data owner signs lineage and the risk function agrees the tier; Gate C remains closed until the missing-label and regression tests are complete. All values in this narrative are hypothetical.

11 Stakeholder decision map to copy

Use one row per named person. A role may advise without signing; record which committee or delegated role holds each decision under the firm's own policy. If any named owner changes, revalidate the remaining approval chain.