ENABLIS INSIGHTS // FINANCIAL SERVICES

When AI can spend your money: Authority, open finance, and who answers for it



Financial services is moving from AI that advises people to AI that acts for them. The two shifts driving it are agentic payments - where the agent holds the card - and open finance - where the customer holds the keys

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// SHIFT ONE: AGENTIC PAYMENTS

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01 The biggest change since contactless

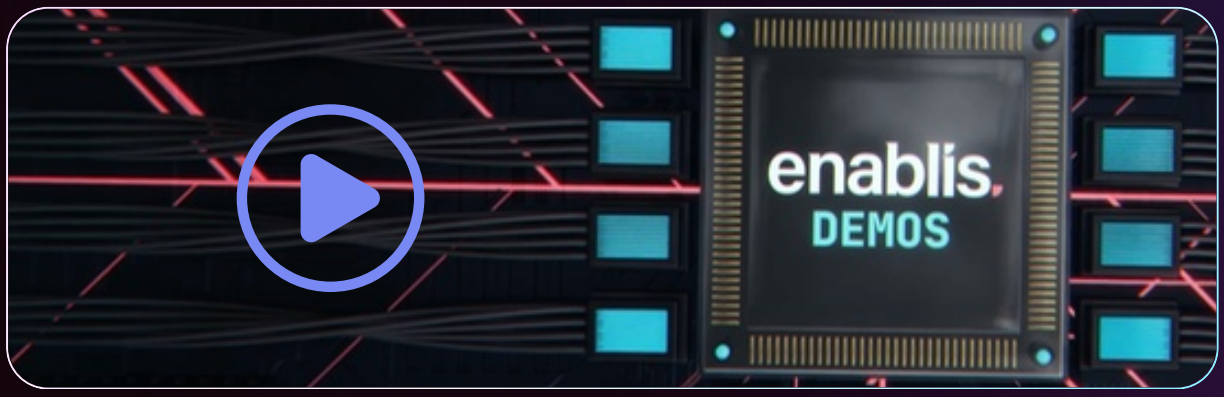
An AI agent could always put something in your basket. Now it can pay for it - and the biggest names in payments have spent a year building the rails to let it.

AI agents are on the verge of spending your customers' money. Plenty of people are writing about it. We built three prototypes to showcase what's becoming possible.

DEMO ONE - BUYING

Oliver Gilbert,
Senior Consultant

Research, comparison and payment, kept inside one conversation - with the customer approving the order.



WHAT IT TAUGHT US

The payment was the easy part.

Fraud systems read "no human" as "bot", so an authorised agent looks identical to an attacker - and the decision that made the sale now happens somewhere the retailer cannot see.

AUTHENTICATION

Security checks fire per transaction and expect a person at a device. An agent buying at 3am has nobody to answer them.

AGENT IDENTITY

Visa and Mastercard have both shipped ways for an agent to prove it is authorised rather than be blocked as a bot.

DOUBLE CHARGES

Agents retry automatically when a response goes missing. Without the right safeguards that bills the customer twice.

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DEMO TWO - PERMISSION

Mike Rossiter,
Senior Cloud Engineer

A signed spending limit that travels with the agent and is checked **before** the money moves.

WHAT IT TAUGHT US

A limit in a setting proves *nothing*.

Permission has to be a signed record - bounded by amount and time - that a bank or a merchant can check for itself, long after the money has moved.



TWO MANDATES

The new protocols separate the customer's standing instruction and its limits from the specific basket, signing each one.

CHECKABLE BY OTHERS

A dispute team has to verify it independently - without phoning the merchant or the agent to ask what was allowed.

DEMO THREE - READINESS

Stephen Martin,
Senior Infrastructure Engineer

Scores a merchant against the **six capabilities** an agent payment needs, and names the gaps

WHAT IT TAUGHT US

The gaps weren't technical.

4/6 capabilities are technical - the two that stall merchants stem from unowned decisions: **who approves an agent**, and **who's responsible when something goes wrong - the merchant, the customer, 3rd party suppliers?**



THE FOUR THAT GET BUILT

A machine-readable catalogue, a checkout an agent can use, safe handling of repeat attempts, and a way to verify agent identity.

THE TWO CAPABILITIES THAT STALL

Who signs an agent off as a counterparty, and which team carries the cost when an agent payment is disputed.

// SHIFT TWO: OPEN FINANCE

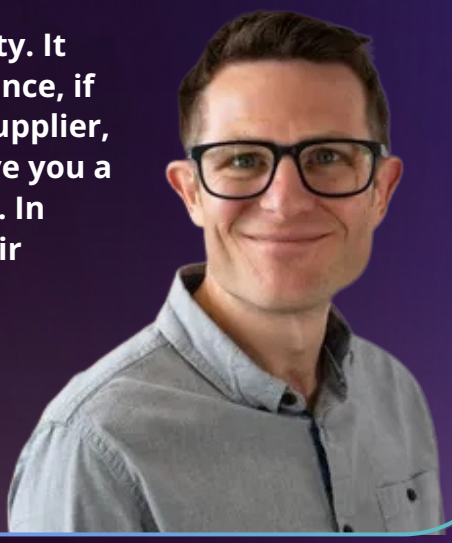
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02 Open finance
When the customer holds the keys

Open banking lets customers share their current account data with a provider they choose. **Open finance extends that same idea to the rest of their financial life - mortgage, savings, investments and pension.** It's one part of a wider UK programme called Smart Data, which applies the same content-based sharing to sectors beyond finance, with energy being the furthest along.

Open finance is all about availability and portability. It spans wider than pure financial services - for instance, if you're on a smart meter and you want to switch supplier, you're able to share your data so providers can give you a genuinely accurate quote rather than an estimate. In theory, this gives consumers more power over their finances across a range of products and services."

SIMON ROBERTS
Technology Delivery Director, Enablis



// THE PROOF IT WORKS

Open banking was mandated in 2018 and does two things: read the data in an account, and initiate a payment from it. It reaches current accounts and credit cards - not mortgages, pensions or investments. Here is what that narrow start became by December 2025:

16.5m
active connections
UP 36% YEAR ON YEAR

351m
payments carried
UP 57% YEAR ON YEAR

24bn
API calls
UP 27% YEAR ON YEAR

// WHAT HAPPENS NEXT

Open finance has the potential to open up a new world of financial products and services - and the groundwork is being laid now. The FCA published its vision in April 2026, with options for a regulatory framework to be considered with HM Treasury during 2027, and schemes scaling from 2028. Firms that already hold the data and the permissions don't have to wait for any of that. Open Banking Limited and EY estimate **open banking alone is worth £7.4bn a year to consumers, SMEs and the wider economy after five years of scaling adoption,** rising to £43bn at full maturity.

// WHERE THE TWO SHIFTS MEET

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Open finance provides a wide financial picture. Agentic payments act within. Together, they change financial products.

01 · AGENTIC PAYMENTS

Can act

Signed, bounded authority to transact on a customer's behalf

+

02 · OPEN FINANCE

Can see

The customer's whole position, not one provider's slice of it

=

THE PRODUCT THAT FOLLOWS

Can transform

Not something a customer is sold and then operates - something that operates itself and transforms financial products.

// WHAT BECOMES POSSIBLE

Three products that could arise from these two core shifts:

1. A customer's agent sees a savings account paying 1.2% and a credit balance costing 29%, and moves the money - within a limit the customer signed, with a record of why.
2. A lender prices an offer against a live, complete financial position rather than a credit file and a declared income, because the customer directed the data at the moment of application.
3. A customer in difficulty is identified weeks earlier, because the signals that predict it sit across products that have never been readable in one place.

WHAT THAT ACTUALLY CHANGES

Banks and lenders

A savings rate that depends on customer inertia stops earning, because the agent notices. The FCA's two priority use cases - SME credit and consumer mortgages - are both places where a live position replaces an estimate. Pricing moves from estimated to actual, and the margin that lived in the estimate goes with it.

FinTechs

The advantage moves from access to judgement. Open banking's narrow scope made data access itself a moat. Open finance plus an agent makes the data ordinary and the quality of the action the product - who can do something useful with it inside limits the customer trusts.

Merchants and PSPs

The buyer becomes software. Discovery moves to structured product data and the funnel telemetry disappears. Merchants who publish machine-readable catalogues and accept a verifiable agent identity get found and scored favourably. Those who do nothing have their agent traffic declined as bot traffic.

Every one of those runs straight into the three questions our prototypes surfaced: what is the agent allowed to do, how is that permission proven to a party who was not there, and who is accountable when it acts wrongly. **The opportunity and the governance problem are the same problem**

// THE ENABLIS READINESS FRAMEWORK

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Four questions before you give software authority

Architecture — Can agents reach the right systems?

Not whether you have an API layer, but whether an agent can reach what matters without a human copying data between systems. The constraint is rarely the model. It is that those systems were never designed to be read by anything other than a screen.

Authority — What are they allowed to do?

What are the limits, where do they live, and can a counterparty check them without asking you? Authority written into a prompt is not authority. It is an intention, and it cannot be produced as evidence later.

Assurance — Can you observe and audit them?

If a system acts at machine speed, the record of what it did is the only element anyone can examine afterwards. Every decision captured, every value traceable to source, alerting in real time rather than at month end. This is the one most often retrofitted, at cost.

Accountability — Who answers for it?

Which named individual answers for an agent's decisions, and what do they need to see to hold that responsibility credibly? In UK banking this is not optional - responsibility sits with a senior management function whether a person or a system did the work.

Most organisations we meet are strongest on **architecture** and weakest on **accountability** - the reverse of the order in which those gaps cause damage.

AI can increasingly analyse, predict, recommend and even act, but where a decision affects access to credit, affordability or a customer in difficulty, there must be clear human accountability.

The technology can be autonomous. The responsibility cannot."

PHIL PRINGLE
Chief AI & Architecture Officer, Vanquis Banking



// WHAT WE ARE HEARING

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We took our conclusion to the people running this

We put the same finding to people running AI and engineering inside banks: that capability has stopped being the constraint, and supervision has become it. Here's what they said:

01 A named human stays accountable, whatever does the work



"In banking, responsibility ultimately sits with the relevant senior management function, so a human is always accountable. That function must have confidence that the system underneath them is functioning correctly - whether it's humans or AI doing the work doesn't change that."

PHIL PRINGLE
Chief AI & Architecture Officer, Vanquis Banking

02 Growth comes from one person overseeing many agents

"In the case of a dual-workforce powered by AI, humans would supervise multiple AI assistants and headcount would be less related to business growth. Quick and easy enquiries would be answered instantly, whereas high-stakes compliance and Know Your Customer/Anti-Money Laundering cases would be escalated to humans."

JOE ROCHE
General Manager, FinTech North



03 But there is a limit to how many one person can oversee



"The human in the middle will stay the bottleneck and the profile of work will define how much intervention and hand holding is needed, limiting the number of parallel agents a single person can run."

MACS DICKINSON
Director of Engineering, LHV Bank

// THE ENABLIS VIEW

Supervision scales with the quality of what the supervisor can see, not with headcount or ambition.

If software is going to act at machine speed, organisations need to know what happened, why it happened, and where the underlying data came from - completely, and fast enough that checking takes minutes rather than days.

That is not a governance problem with an engineering tail. It is an engineering problem, and it is one we have already solved in production, at scale, in exactly this kind of environment.

// CLIENT STORY

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TransUnion
Real-time product monitoring

Spotlight: enablis. × TransUnion

// THE CHALLENGE

TransUnion's TrueVision service sends credit data to lenders across 1.5 million requests a day. At that scale, they wanted complete confidence in every outbound value and real-time visibility to see exactly what their platform was sending, the moment it sent it. So they set out to build live monitoring and assurance directly into a busy, highly regulated product

// WHAT WE DELIVERED

We built a modular monitoring platform in three parts:

1. **WHAT HAPPENED**
   A data exhaust that captures every request and score into an Azure data lake
2. **WHY IT HAPPENED**
   Live monitoring that streams key attributes through OpenTelemetry, giving real-time dashboards and alerts across the platform
3. **WHERE THE DATA CAME FROM**
   A cloud analytics layer to trace any value back to its source - all reusable across their product portfolio

TransUnion now has real-time assurance across TrueVision and a proven model they're already extending to more of their products.

1.5m+
Daily credit requests and rising

2000+
Data attributes with live assurance

Real-time
Full visibility across a live product

Reusable
One build, modular across their portfolio

Enablis understood what mattered to us quickly and built something we now rely on every day, and can reuse right across our products.

A brilliant team to work with."

MIKE HUME
Senior Director of Product Delivery, TransUnion

// WHAT WE BELIEVE IS CHANGING

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Financial services is moving from AI that recommends to AI that acts

Before AI can act for your customers, you need to know what you can trust it to do. Financial institutions have an opportunity to move beyond AI-assisted processes towards services that can act on behalf of customers.

But deploying those services requires more than capable models. It requires systems that can enforce authority, demonstrate compliance, explain decisions and support accountability.

At Enablis, we combine practical experimentation with experience building and assuring high-volume, regulated technology platforms.

The starting point is understanding where autonomous capabilities could create value in your organisation, and what would be required to deploy them responsibly.

Talk to Enablis about identifying your first viable use case and the controls needed to take it forward.

Your AI Journey

Whatever your position - whether you need to **assess, build, transform or scale your technology capability**, we're ready to amplify your teams and deliver real outcomes.

// SPEAK TO OUR TEAM

Get in touch to set up an initial Discovery call with **Client Partner, Mark Melvin**

// EMAIL MARK



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Profit from ideas.
The power of possibility.