

19.09

DECISION DOSSIER · COLLECTIONS

The offer was permitted at 09:48. At 09:50 the mandate narrowed, and the message goes at 09:55.

A bank lets an agent offer the standard repayment arrangements of its forbearance policy in a conversation, on arrears up to €2,500, under mandate CO-03.4. On 19 September the third referral in seven days for the same reason, a support flag set during the day that the agent's overnight copy of the customer file does not hold, narrows the mandate to recommend. An offer permitted two minutes earlier is in the messaging service's next five-minute batch. A customer who was handed over on 15 September has written to ask what the system did with what she told it. The room decides what happens next.

Before the session, ten minutes: read pages 1 to 4; pages 7 and 8 are the record of the two acts, field by field, for the seats that read records. **In the session:** pages 5 and 6, the questions, in pairs, then together. Write down what you would do, who decides, and which evidence you would ask for. Where the dossier does not say, say what you would need to know.

In the dossier

- the timeline, 15 to 24 September
- conversation 2263, the customer file, and the mandate
- release v1.3 and the record as at 09:55
- a complaint from a customer
- the questions
- the record of the two acts, field by field

Where it comes from

The collections case of the control plane map: conversation 2214 and the referral of conversation 2219, the file as at 07:00 against the record at 09:40, mandate CO-03, rules R-11 and R-11V, and the loop that narrows on the third referral. The dossier adds the offer in the message queue and the customer who asks.

THE SITUATION

Five days, one overnight copy, three flags missed

The bank contacts about 120,000 customers a year who have missed a payment; about 48,000 conversations pass through the agent, some 190 a working day, twice that after a long weekend. Under CO-03.4 the agent takes income and spending in the conversation, offers one of three standard arrangements from an approved template, and asks the messaging service to send; the service sends offers in batches every five minutes. Rule R-11 narrows the mandate after three referrals for one reason in seven days; R-11V narrows it at once if an offer is found sent to a customer with a support flag. The agent reads a copy of the customer file refreshed overnight; the specialist support team sets flags during the day.

- 15.09 09:40 Customer C-5538 calls the bank after losing her job. The specialist support team sets a support flag on her record.
- 15.09 10:07 Conversation 2219: the agent, on its copy of 07:00, drafts a standard offer of €85 a month for six months. The check reads the customer record, finds the flag, and refers the conversation. Referral 1. Specialist S-061 takes over at 10:12 and agrees a three-month payment break.
- 17.09 Conversation 2240, the same agent, the same reason. Referral 2.
- 19.09 09:48 Saturday. Conversation 2260, customer C-5610: no flag, arrears €410, €60 a month for six months under RA-2. Permitted under CO-03.4 and queued for the 09:55 batch with 11 other offers.
- 19.09 09:50 Conversation 2263, customer C-5633: a flag set at 08:30 that morning is in the record; the copy of 07:00 predates it. The check refers it. Referral 3. R-11 narrows CO-03.4 to CO-03.5, recommend only. The Head of Collections and the Head of Conduct Risk are alerted.
- 19.09 09:55 The messaging batch is due. Twelve offers, among them 2260.
- 19.09 10:20 Customer C-5633, who was mid-conversation, has not heard from anyone for thirty minutes.
- 21.09 Review CR-044 finds the cause: the overnight refresh. The customer data team streams flag changes to the copy and verifies 25 lookups; no offer went to a flagged customer.
- 21.09 Monday: missed payments and messages bunch after the weekend, and the conversations double. Customer C-5538 writes on 22.09 (page 5).
- 24.09 After 40 clean offers sampled by the conduct team, restoration to CO-03.6 is proposed for signature.

The capacity, from the case pack. While CO-03.5 is in force, every conversation the agent would have closed with an offer needs a specialist's decision: about 190 a day, at 8 minutes each, about 25 specialist-hours, four specialists. On the Monday after a weekend, about 51 hours and seven specialists. On a normal day the check refers about 38 conversations, five hours of work.

EXHIBIT A · CONVERSATION 2263

CUSTOMER	C-5633, personal loan L-3471, monthly instalment €210, arrears €420 after two missed payments
THE CONVERSATION	09:31 to 09:50, in the app: the customer says she can pay "something, not everything, for a while"; income and spending taken; €110 a month left after essentials
THE FLAG	set at 08:30 by the specialist support team after a call from the customer's adviser at a debt charity; reason: specialist support, do not offer standard arrangements
THE AGENT'S COPY	the customer file as at 07:00: no flag
PROPOSAL	a reduced payment of €95 a month for six months, arrangement RA-2, template RA-2-T3 · declared basis: the file as at 07:00, forbearance policy v7 · operation M2263-O1

EXHIBIT B · THE CUSTOMER FILE, AS CLAIMS WITH THEIR SOURCE

CLAIM	SOURCE	OWNER	VALID
C-5633 has a support flag: specialist support, no standard arrangement	customer record, 19.09 08:30, specialist support team	the specialist support team	from 08:30 on 19.09
~~C-5633 has no support flag~~	the agent's copy of the file, 19.09 07:00	the customer data team	to 08:30, superseded
A customer with a support flag is handed to the support team before any offer	forbearance policy v7 §4; mandate CO-03 conditions	Head of Collections	in force
RA-2 is a reduced payment for up to six months, no fee waived	forbearance policy v7 §6.2	Head of Collections	in force
The customer is told she is talking to an AI system, and can ask for a person at any point	the AI Act, Article 50, as the bank reads it; conduct rules	compliance	in force

The customer record is the binding source for what the bank knows about the customer. The claims are what the agent may use, each traced to its entry; where the copy and the record disagree, the record wins, and the copy is corrected.

EXHIBIT C · MANDATE CO-03, VERSION 03.4, SINCE 01.08.2026

OWNER	Head of Collections
AGENT	collections-agent-05, acting for Collections
ACTION	offer the standard repayment arrangements of the forbearance policy in a conversation, and send the offer through the messaging service
LEVEL	decide: the agent offers within the mandate; the messaging service sends
LIMIT	arrears up to €2,500 · a reduced payment for up to six months · no fee waived · €400,000 of arrears under new offers a day across the deployment
CONDITIONS	arrangement types RA-1 to RA-3 only · income and spending taken in the conversation · no support flag on the customer record · no open complaint · no legal action started · the offer text from an approved template, with its numbers filled from the record
MAY NOT SAY	the agent never mentions legal action, a default notice, or a fee not yet charged, and never presses for payment
REVIEW TRIGGER	three referrals for one reason in seven days (R-11); an offer sent to a customer with a support flag narrows at once (R-11V)
RESTRICTION	rules R-11 and R-11V: restrict to recommendations and open a review
REVOCATION	the owner, the second line, or a revocation rule
CHALLENGER	Head of Conduct Risk, the second line
RESTORE	after 40 clean offers from a test chosen for the cause, sampled by the conduct team, on two signatures, the owner's and the Head of Conduct Risk's
EXPIRY	31.12.2026, or the next release of the agent, whichever comes first; renewed on the evidence of the quarter
DEPUTY	the Head of Customer Support signs in the owner's absence, within the same limits

EXHIBIT D · RELEASE V1.3, THE MANIFEST

IDENTITY	collections-agent-05, its own identity, tokens valid for 15 minutes
MODEL ROUTE	a small model (tier-1 model, version 2026.06.1, hash 7c41e0) holds the conversation; a larger model (tier-2 model, version 2026.05.2, hash e9a3b7) drafts the offer for about one in three · a provider change to either model under the same name is a new release
INSTRUCTIONS	prompt set collections-talk 1.3, with the may-not-say list
TOOLS	customer file copy (read) · customer record (read, through the check) · forbearance templates (read) · send request, through the check only (write)
RETRIEVAL	the copy of the customer file, refreshed overnight; flags set during the day reach it the next morning
DEPENDS ON	mandate CO-03 · control standard CS-11: refer any flag, any open complaint, any legal action, any offer outside RA-1 to RA-3, and any mismatch of basis
VALIDATED	by model risk on 20.07.2026, report MRV-047 · the conduct team listens to a sample of conversations every week

EXHIBIT E · THE RECORD, AS IT STANDS AT 09:55:00 ON 19.09

M2219-02 · 15.09 10:07 · collections-agent-05 · release v1.3 · C0-03.4 · declared file 07:00 / record 09:40, support flag · RA-2 · REFER

M2219-S1 · 15.09 10:12 · specialist S-061, support team · conversation taken over · a three-month payment break · ARRANGE · recorded in the loan system

M2260-01 · 19.09 09:48 · collections-agent-05 · release v1.3 · C0-03.4 · record 09:48, no flag · RA-2 · €60 a month for six months · PERMIT

 six of six · permit bound to C0-03.4, release v1.3, and this exact text · valid for the next batch · queued for 09:55

M2263-01 · 19.09 09:50 · collections-agent-05 · release v1.3 · C0-03.4 · declared file 07:00 / record 08:30, support flag · RA-2 · €95 a month · REFER

 owner: specialist support team · reason: basis mismatch (3) · customer in conversation

R-11 · three referrals for one reason in seven days: M2219, M2240, M2263 · C0-03.4 → C0-03.5, recommend · 09:50:03

 alerts: Head of Collections, Head of Conduct Risk · review CR-044 opened

09:55:00 · messaging batch · 12 offers in the queue, permitted between 09:31 and 09:48, among them M2260-01

The messaging service holds the credential to send, and sends only an offer that carries the check’s permit. The agent cannot send; it can only ask.

What the record does not yet show is what the messaging service did at 09:55 with the twelve permitted offers, and what customer C-5633 was told while the referral waited. Those are questions 1 and 3.

EXHIBIT F · A COMPLAINT FROM CUSTOMER C-5538, 22.09

"On Tuesday morning your app asked me about my income and my spending and I told it everything. Then it said it was passing me to a colleague, and a person called and agreed a payment break, which I am grateful for. But what happened to what I typed? Was the app a computer? Did it decide anything about me, and did my job loss go anywhere? I was told nothing about why I was passed on. I would like a person to explain."

1. Does the offer in conversation 2260 go out at 09:55, and the other eleven? What does the messaging service check at the batch, and what does the record show afterwards?

touches w3 · w4 · p4 · w5

2. The Head of Collections wants CO-03 restored before Monday 21.09, when the conversations double. The conduct team has a review open. Who may restore it, who may hold that, and who decides if they disagree?

touches w3 · w6 · e3 · e4

3. From 09:50 until authority returns, with conversations doubling on Monday: who takes the queue, in which order, and what is a customer mid-conversation told, in what words?

touches w4 · w6 · e6 · the customer

4. Which evidence, produced by someone who did not run the agent, shows that no offer went to a flagged customer since the release went live, and that no offer said what the mandate forbids?

touches w5 · p2 · p5 · e5

5. What test must pass before CO-03.6 is signed? Are 40 clean offers, sampled by the conduct team, enough, and who decides that?

touches w6 · p6 · e4 · w1

6. What does customer C-5538 receive, from whom, and by when? What did the system decide about her, what was she told at the time, and which of her rights does the reply name?

touches w5 · w4 · the customer

Afterwards, on your own workflow. For each question, mark the boxes it touches on the print map of your own workflow: not in place, designed, operating, or evidenced. Where the room disagrees, keep both marks and write down who resolves it.

THE RECORD, FILLED · CONVERSATION 2214 · THE CLEAN ACT

Conversation 2214 14.09.2026 · the offer permitted at 10:07, delivered in the 10:10 batch

The fourteen fields of the record line (part three, slide 9), filled for this act; Exhibit E on page 4 continues the record on the day of the dossier.

FIELD	WHAT IT HOLDS	CONVERSATION 2214 · THE CLEAN ACT
BEFORE THE ACT · WHAT THE CHECK READ		
when	the second the check decided, and the second the act committed	decided 14.09.2026 10:07:03 · committed 10:10:00, the messaging batch · delivered 10:10:04
the agent and its identity	which agent, acting for whom, under its own identity, and how long its credential lived	collections-agent-05, acting for Collections · its own identity · token issued 10:02:14, valid 15 minutes · disclosed as an AI system at 10:02:20, in the first line of the conversation, the customer told she can ask for a person
the release	the release id, each model by version and hash, the prompt set, the validation report	v1.3 · tier-1 model 2026.06.1 (7c41e0) · tier-2 model 2026.05.2 (e9a3b7) · prompt set collections-talk 1.3, with the may-not-say list · validated by model risk, MRV-047, 20.07.2026
the basis	each claim the act relied on, its version, and its standing at that second on both axes: evidential warrant, and authority	Customer C-5521 carries no support flag · the customer record as at 10:07 on 14.09 · read through the check · warrant validated · current to the second · authority: the specialist support team, who set and lift flags · the customer data team C-5521 has €95 a month left after essential spending · the conversation, 10:06 · the customer's own figures · warrant provisional · the customer's own statement, unverified · authority: the customer A reduced payment for up to six months on arrears to €2,500 is a standard arrangement, RA-2 · forbearance policy v7 §3 · template RA-2-T3 · warrant foundational · in force · authority: the Head of Collections, with conduct risk
the mandate version	the mandate in force at that second, with its level and its limit	C0-03.4 · since 01.08.2026 · decide · standard arrangements RA-1 to RA-3 · arrears to €2,500 · €400,000 of arrears under new offers a day across the deployment
the control standard	the control standard version and the rule set the check applied	CS-11 v2026.2 · rule set RS-C0-03 r5
the consequence tier	the tier the act was classified into, and the version of the taxonomy that classified it	routine · taxonomy CT-2026.1 · a standard arrangement on arrears of €240, one customer, withdrawable, no fee, no money moved
AT THE ACT · WHAT THE CHECK DECIDED		
the check's decision	permit, refer, or block, how many of the six inputs held, and the reason code	PERMIT · six of six · reason code OK
the exact act	what was done, to whom, for how much, under which id, once	send offer RA-2-T3 to C-5521 in conversation 2214 · €85 a month for six months · M2214-01 · once
the permit	its id and what it was bound to: the mandate version, the release, the basis version, the exact act; and how long it held	PR-2214-1 · bound to C0-03.4, release v1.3, the customer record as at 10:07 and policy v7, the exact text of RA-2-T3 · valid for the next messaging batch
AFTER THE ACT · WHAT CAME BACK		
the receipt	what the receiving system returned, and the reconciliation against it: one permit, one act, one receipt	D-2214 · delivered by the messaging service 10:10:04 · reconciled against the messaging log and the loan system: one permit, one message, one receipt
the human decision	where a person decided: who, under which authority, what they confirmed, and when	none needed
the cost	what the decision cost in tokens, and in a person's time where one was needed	€0.24 in tokens · no specialist time
retention	how long the record, the manifest, and the permits are kept, and personal data inside them by its purpose	the record, the manifest, and the permits: six years from the end of the arrangement, the period the bank sets for conduct decisions of this tier (illustrative) · the conversation and the personal data in it by purpose and retention rule · a corrected fact is a new, linked entry

control standard CS-11, version 2026.2 · rule set RS-CO-03 r5: refer any flag, any open complaint, any legal action, any offer outside RA-1 to RA-3, any mismatch of basis · CT-2026.1 · the bank's consequence taxonomy · proposed by the CRO with conduct risk and Collections, set by the board, 06.2026 · ids and figures invented

THE RECORD, FILLED · CONVERSATION 2219 · THE REFERRAL

Conversation 2219 15.09.2026 · the offer referred at 10:07, the conversation taken over by a specialist at 10:12

The fourteen fields of the record line (part three, slide 9), filled for this act; Exhibit E on page 4 continues the record on the day of the dossier. The agent's line and the person's are marked O2 and S1.

FIELD	WHAT IT HOLDS	CONVERSATION 2219 · THE REFERRAL
BEFORE THE ACT · WHAT THE CHECK READ		
when	the second the check decided, and the second the act committed	O2 referred 15.09.2026 10:07:11 S1 decided 15.09.2026 10:12:40 · message delivered 11:20 · the arrangement recorded 11:22
the agent and its identity	which agent, acting for whom, under its own identity, and how long its credential lived	O2 collections-agent-05, acting for Collections · its own identity · token valid 15 minutes · disclosed as an AI system at 09:58:04, in the first line of the conversation, the customer told she can ask for a person S1 specialist S-061, the specialist support team · her own login
the release	the release id, each model by version and hash, the prompt set, the validation report	O2 v1.3 · tier-1 model 2026.06.1 (7c41e0) · tier-2 model 2026.05.2 (e9a3b7) · prompt set collections-talk 1.3 S1 none · a person took the conversation over
the basis	each claim the act relied on, its version, and its standing at that second on both axes: evidential warrant, and authority	Customer C-5538 carries no support flag · declared: the file as at 07:00 on 15.09, the nightly copy · superseded at 09:40 · warrant fails on currency · contradicted by the customer record · authority: the customer data team Customer C-5538 is flagged for specialist support since 09:40 on 15.09 · applicable: the customer record · set by the specialist support team at 09:40 · read by the check at 10:07 · warrant validated · current · authority: the specialist support team A flagged customer receives no standard arrangement from the agent · mandate C0-03.4, the never-to line · forbearance policy v7 §8 · warrant foundational · in force · authority: the Head of Collections, with conduct risk
the mandate version	the mandate in force at that second, with its level and its limit	O2 C0-03.4 · decide · RA-1 to RA-3 · arrears to €2,500 S1 the specialist's authority · payment breaks and bespoke plans · the forbearance procedure
the control standard	the control standard version and the rule set the check applied	CS-11 v2026.2 · rule set RS-C0-03 r5
the consequence tier	the tier the act was classified into, and the version of the taxonomy that classified it	critical · taxonomy CT-2026.1 · a customer flagged for specialist support: never the agent; a specialist decided it
AT THE ACT · WHAT THE CHECK DECIDED		
the check's decision	permit, refer, or block, how many of the six inputs held, and the reason code	O2 REFER · five of six · reason code BASIS-01: declared file 07:00, record 09:40 with a support flag · owner: specialist support S1 ARRANGE · the specialist's decision
the exact act	what was done, to whom, for how much, under which id, once	O2 proposed: offer RA-2 at €85 a month for six months to C-5538 · M2219-02 · never sent S1 a three-month payment break for C-5538 on loan L-3417 · M2219-S1 · once
the permit	its id and what it was bound to: the mandate version, the release, the basis version, the exact act; and how long it held	O2 none · the conversation went to the specialist, with a holding message that promised a person and no arrangement S1 none needed · a person's arrangement, recorded in the loan system
AFTER THE ACT · WHAT CAME BACK		
the receipt	what the receiving system returned, and the reconciliation against it: one permit, one act, one receipt	O2 none S1 D-2219 · the specialist's message delivered 11:20 · the payment break recorded in the loan system 11:22 · reconciled: one arrangement, one record
the human decision	where a person decided: who, under which authority, what they confirmed, and when	O2 none yet · referred to a person with the reason S1 specialist S-061 took the conversation over at 10:12 and agreed a three-month payment break
the cost	what the decision cost in tokens, and in a person's time where one was needed	O2 €0.24 in tokens S1 €7.33 of a specialist's time
retention	how long the record, the manifest, and the permits are kept, and personal data inside them by its purpose	the record, the manifest, and the permits: six years from the end of the arrangement, the period the bank sets for conduct decisions of this tier (illustrative) · the conversation and the personal data in it by purpose and retention rule · a corrected fact is a new, linked entry

ids and figures invented; the control standard and the taxonomy are on the page before