The AI Native Financial Institution:
Redesigning Operating Models for an Agent-Led World

Introduction

The adoption of financial services is accelerating, but operating models have not always kept pace. While early deployments focused on copilots that assist employees, emerging agentic systems can execute workflows, coordinate actions, and operate with limited human intervention.

This shift challenges a core assumption underlying most financial institutions: that human judgment is the primary control mechanism. Many operating models, governance structures, and risk frameworks are designed around assumptions about ownership, oversight, and escalation. As agents take on more responsibility, these assumptions are stretched, creating new opportunities and risks. Institutions that delay redesigning these models while preserving transparency, governance and accountability.

How to use this paper

Use this paper as a working guide to align leadership, select primary journeys and design governance that enables safe scale. Use the Core Blueprint to anchor decisions, then apply the Operating Model Implications and Capabilities Required to your context.

Apply Appendix A (pre-agentic journeys and translate them into economically evidence and escalation requirements agents can implement. Use Appendix B to align stakeholders on the operating model shifts and capability gaps that typically emerge as you move from copilots to agentic workflows. Use Appendix C to ensure governance, risk and control assumptions are explicitly stress-tested before moving ahead.

Key Takeaways

Clarify end-to-end ownership, escalation paths, and accountability for agent-led outcomes, not just tooling.

Scale autonomy through explicit tiers

Assist → recommend → act with limits → act at scale, based on risk and evidence.

Anchor governance in established supervisory expectations

Use existing model risk, operational resilience and conduct principles as a baseline.

Start with 2-3 high-impact journeys and a 90-day plan

Make control design and evidence part of delivery from the start.

Why Operating Models Break When AI Moves from Assistance to Execution

When AI starts executing work, operating models must change. Most financial institutions have implicitly made existing operating models work by relying on human judgment to bridge gaps between systems, policies, and exceptions. That model breaks when agents can act directly, because they lack the context, accountability, and escalation instincts of experienced employees.

- **Accountability changes** journey ownership must be explicit, while zero outcomes, exceptions, and customer recovery end to end.
- **Controls change** from static policy reviews must be built into the workflow: policy, limits, thresholds, overrides, retrieval, and reconstruction after the fact.
- **Operations change** Telemetry, thresholds, and "stop-the-line" rights become management practices as autonomy scales.

The AI Native Operating Model (Core Blueprint)

The maturity path: Copilots → agentic workflows → selective autonomy

Stage 1 - Copilots (assist humans)

Accelerates drafting, search, analysis, and decision support by assisting employees in tasks across, triaging, escalation cases.

Stage 2 - Agentic workflows (execute with guardrails)

Redesign priority journeys so agents can execute bounded steps with thresholds and measurable KPIs

Stage 3 - Selective autonomy (continuous learning & closed-loop)

Scale governed autonomy where it is appropriate, using continuous monitoring, incident response, and audit-ready evidence as standard practice.

Outlook (2026-2031)

Over the next several years, many institutions will move from assistance to execution, redesigning workflows in priority journeys. The following outlook describes how operating and ecosystem models will change, and what leaders can do now to stay ahead of the curve.

Figure 1. Practical maturity path from copilots to agentic workflows to selective autonomous operating model.

The blueprint four operating model building blocks

- **Journey ownership and measurable outcomes** Define end-to-end ownership, KPIs, and clear accountability for each journey.
- **Autonomy tiers and decision rights** Specify what agents can do, when approval is required, and escalation.
- **Controls in the loop and evidence by design** Build policy, limits, overrides, retrieval, and audit trail into workflows.
- **Agent-ready foundation** Trusted data, integration, observability, and easy dependability.

Autonomous Operations Become the Norm.

Routine, bounded workflows, including research-based tasks, will be executed by agents with human oversight shifting to exception handling and control. Human time will concentrate on complex cases, relationship moments, and high-stakes decisions.

Hyper-Personalized, Invisible Customer Experiences

Customers will expect banks to anticipate needs and act proactively. Agents will orchestrate actions across products and channels, with human oversight limited to high-impact moments.

AI-First Organization & Talent

Leading banks will redesign roles around **human-machine collaboration**. Employees will supervise agents, set strategy, and manage exceptions. Success will depend on AI literacy, change management, and a culture that rewards learning and adaptation.

Tech Services Reinvented AI Era

Technology providers will shift from selling **licenses that go to market**. It will become a core capability, with platforms competing on how well they enable governed autonomy. Vertical firms will specialize in high-touch delivery (e.g., AI advisory services), while horizontal players will focus on scale, integration, and infrastructure.

Organization Design for Governed Autonomy

The minimum viable org model: platform teams per priority journey

As AI takes on more routine work, leadership must reconfigure how work is organized. Today's functional platform teams (operations, risk, compliance, technology) will give way to journey-aligned teams that combine domain expertise, technical skills, and control performance.

In practice, this shifts humans' capacity toward higher-value work: complex judgment calls, exception handling, customer recovery, policy interpretation, and continuous improvement of the agents themselves. Leaders should expect fewer people in repetitive roles and more in roles that "own" outcomes. As part of the product design in the 2025 Future of Jobs Report, the World Economic Forum highlights the scale of expected role changes and the leadership imperative to set automation-ready work.

Who Does What: Delivery, Guardrails, and Assurance

Governed autonomy works when lines of responsibility are explicit and embedded in delivery, not managed through ad-hoc steering. A simple, scalable model looks like this:

1st line (journey/platform teams) Build and run agentic workflows; own KPIs, exceptions, and service recovery; produce evidence by design.

2nd line (risk/compliance) Set guardrails; review high-impact changes; test and control requirements; challenge assumptions and adherence.

3rd line (internal audit/assurance) Validate that evidence is complete and reproducible; test controls and governance; report on effectiveness.

Where to start: Prioritize 2-3 journeys where value is high and decision boundaries can be made explicit. Look for workflows with clear escalation triggers, measurable outcomes, and strong existing data. Avoid those with ill-defined edge cases, where human judgment is central to the work, and where the operating model implications far outweigh the economic and technical benefits.

Governance and Controls: How to Scale Without Losing Trust

The governance challenge with agentic AI is not whether humans remain involved, but whether they remain meaningfully involved. Unlike traditional software, agentic systems can plan, adapt, and act across multiple steps, which means that many decisions are made by the agentic workflow, so they can explain decisions, attribute actions and manage exceptions consistently. In its 2021 Principles for operational resilience, the Basel Committee on Banking Supervision emphasizes that operational resilience depends on governance, risk management, and assurance practices that can adapt as conditions change.

The goal is not "no humans," but the right human involvement at the right risk level, with clear accountability and unambiguous evidence. Leaders can think about this in three layers: Governance (who is accountable), Controls (what must be true before and during execution), and Assurance (how we know it is working). Guidance in the UK Guidance on model risk management, in the United Kingdom, the Prudential Regulation Authority's (2023) sets out model risk management principles for banks, building societies and PRA-designated investment firms. These principles are useful examples because they:

- **Identify, assess, and mitigate model risk** Apply a clear framework for model risk, including risks specific to agentic tools and evolving customer-context controls.
- **Test and monitor models** Require ongoing validation, monitoring, and performance checks, not just one-time approval before launch.
- **Observability and telemetry** Work to end tracing across prompts, tool calls, decisions, and escalations, with dashboards for quality, cost, and drift.
- **Limits/No/Go for agentic** Evaluation suites, red-teaming, version control, drift monitoring, and rollback aligned to regulated change expectations.

Governance and assurance should be designed into the workflow, not added afterward. Start by defining clear rules for what agents can do, when they must escalate, and what evidence must be captured. Then test those rules before launch and monitor them continuously in production. Finally, make sure every material decision can be reconstructed after the fact, including the inputs, tools used, approvals, and escalation path.

Treat governance as a product: version it, test it, monitor it, and improve it based on real-world performance. Organizations that can prove their agents are safe, controlled, and auditable will be able to scale faster than those relying on manual oversight alone.

The Agent-ready Foundation

Agentic workflows are only as dependable as the systems they can call upon and the data they can trust. To move from prototypes to production, institutions need an **agent-ready foundation**: governed data, secure tool access, and end-to-end observability by agents can act safely in real business systems. In its 2021 Artificial Intelligence Risk Management Framework (AI RMF 1.0), the National Institute of Standards and Technology (NIST) emphasizes that trustworthy AI depends on managing risk across the full lifecycle, not just at model launch.

- **Data products and semantics** Standardized definitions, lineage, quality SLAs, and controlled access to features used in underlying models and agent workflows.
- **Tool/API layer for agents** Secure, well-documented interfaces with clear permissions, rate limits, and safe failure modes.
- **Test environments** Sandboxes, synthetic data, and "shadow mode" runs before agents touch live customers or money.
- **Incident playbooks** Clear ownership, escalation paths, and customer remediation when agents misbehave.

The table below summarizes the most material shifts leaders should expect, and the practical implications for talent, governance and how they will work.

Next 90 Days: A Practical Path to Production

Pick journeys, agree on autonomy tiers, and align stakeholders.

Days 0-30

Build the agentic workflow MVP, implement logging/telemetry, evaluation checks, and pressure-test exception handling with risk/ops.

Days 31-60

Deploy into a controlled production slice, measure KPIs and incidents, refine control gaps, then decide to scale, pause or redesign.

Conclusion: The Executive Call to Action

A native AI/ML institution will not be defined by how many copilots it has, but by how many journeys it has governed agentic workflows—while maintaining auditability, resilience, and clear accountability.

The practical path forward is to start with a few high-impact journeys, define autonomy tiers and decision rights, embed controls and evidence by design, and build the agent-ready foundations (data, tools, observability) that make scale possible. Institutions that industrialize repeatable patterns—platform teams, operating speed governance and an agent-ready foundation—will be best positioned to move from experimentation to durable advantage.

If additional support is needed, Accenture can support with selection, control design requirements and implementation support as teams can validate outcomes and governance before scaling.

Appendices

Appendix A — Priority Journeys and Operating-Model Implications

Priority Process	Operating Model Implication
Underwriting & credit decisioning	Clarify decision rights and re-tiering; necessary; accelerates evidence packs (data, rationale, policy checks), and target and limit automation for quick wins and credit quality.
Customer service & engagement	Redesign the service journey with clear ownership (containment), controlled customers, high-value cases, and a clear intervention/escalation triggers and a new role tasking.
Claims processing & fraud detection	Define scope and approval gates by severity, ensure investigation powers and explainable triggers, escalate, and preserve evidence for disputes, audits, and regulatory reviews.
KYC/AML & financial crime operations	Standardize case packs (alerts, ownership, narrative), investigation responsibility, audit-ready evidence, decision logic, and align resolution timeframes to the same operating rhythm.
Payments, disputes & operational exceptions	Define automation boundaries for high-volume, low-value tasks; ensure an agent-human handoff, and a trail and traceability to operations can manage risk, SLAs, and customer recovery.
Collections & delinquency management	Embed consent and fair-treatment rules (e.g., cooling-off timing), define escalation for hardship/vulnerability, and ensure every automated action is explainable, auditable, and reversible when customers dispute or circumstances change.
Risk, Finance & regulatory reporting	Assign accountable owners for data changes and reconciliations, standardize evidence and logs off, and ensure reporting can be reconstructed and explained to supervisors on demand.

Appendix B — Operating Model Shifts

The table below summarizes the most material shifts leaders should expect, and the practical implications for talent, governance and how they will work.

As-is/from-shift	Capabilities required
Automation promises and agents to core workflows	Establish end-to-end ownership of priority KPI (cost-per-log, underwriting and claims, self-production guide and escalation).
Automation promises and embedded AI in customer experience	Redesign and approval workflows to ensure accuracy, and to set and to support and human-in-the-loop for high-risk decisions.
Continuous risk monitoring and AI-enabled reporting	Operationalize AI governance and compliance validation, data testing, audit evidence, and regulatory reporting for AI-driven processes.
Rapid legacy modernization with AI and cloud	Automate and modernize legacy systems, and data, and governance, and further than making deployment at the front line.
Outcome-focused, as-a-service operating philosophy	Implement ethical and explainable AI frameworks as standard operating controls.
Digital legacy modernization with AI and cloud	Leaders must and data foundations to support AI workloads (scalability, resilience, and cost-disciplined).
Outcome-focused, as-a-service operating philosophy	Leaders must be confident to work and skills, orchestration, learning to make systems again ready.
	Align delivery to business outcomes (customer experience, risk reduction, efficiency) with shared accountability across business and technology.
	Establish continuous portfolio prioritization, discovery, and governance rather than treating deployment as the finish line.
	Build for modern commercial models (managed services, partnering, investment-based pricing) that consumption and value, delivered.

These shifts are most manageable when treated as operating model design decisions (incentives), decision rights, controls, and evidence—not as technology upgrades alone.

Appendix C — References, Method, Definitions, Assumptions, and Glossary

Method, Definitions, and Assumptions

Method

This white paper synthesizes publicly available regulatory guidance, industry research with operating-model patterns observed across BFSI leaders and Accenture engagements. Accenture leads the Basel Committee on Banking Supervision's (BCBS) Principles for operational resilience, the UK Guidance on model risk management, in the United Kingdom, the Prudential Regulation Authority's (2023) sets out model risk management principles for banks, building societies and PRA-designated investment firms. These principles are useful examples because they:, and the Financial Stability Board's (FSB) Principles for effective risk data aggregation and risk reporting. Bank for International Settlements (BIS) Consultative Document, Cyndfors, N. "DBS Bank leverages data to raise operational efficiency and customer engagement." Supervisory Insights, Issue 30, 2019.

Definitions

Terms such as AI native, agentic workflows, autonomous operations, governance, and scalability are used in the specific sense defined in the Glossary of Key Terms. Where terms have different meanings in different contexts, readers should use their internal definitions.

Assumptions and Limitations

The recommendations are directional and may not apply to all organizations.

A regulated BFSI context where model risk management, operational resilience, privacy, and conduct requirements apply, and where human oversight is expected for high-impact decisions.

Availability of, and maturity of, data, platforms, and talent may vary across countries, legal entities, and business lines; segmentation, strategy, and change management suitable for production AI.

That agentic workflows are assumed to operate within clear boundaries, with auditable decisions, and scaled only when outcomes improve and risk remains within agreed tolerances and be supervised.

Glossary of Key Terms

Key Term	Definition (in this paper)
AI native	An operating model where AI is embedded into core decisions and workflows and redesigned around it, with governance, data, and talent built to support it at scale.
Autonomous operating model	The enterprise-wide operating model where governed agentic workflows and autonomous agents run core operations continuously, with defined decision rights, escalation paths, monitoring, and auditability.
Autonomous agent	A software component that can plan and take actions toward a goal (e.g., gathering information, using tools, and completing multi-step tasks) with limited human intervention, within defined boundaries.
BPO	Business Process Services, and insurance.
Copilot	An AI assistant that augments an employee's work (e.g., drafting, summarizing, coding) but typically does not take actions independently in production systems.
Embedded finance	Delivery of financial products and services within non-bank channels (e.g., commerce platforms), increasingly orchestrated by AI and data.
Explainability	The ability to communicate why an AI system produced a result in a way that supports human review, regulatory expectations, and appropriate customer recourse.
Human in the loop (HITL)	A control model where humans review, approve, or override AI recommendations—especially for high-risk decisions, exceptions, and edge cases.
Model risk management (MRM)	Governance and controls for developing, validating, monitoring, and retiring models, including AI and machine learning models.
Outcome-based delivery	Operating and delivering model where programs are measured by business results (e.g., cycle time, loss reduction, time-to-first-value) rather than activity or effort alone.
Platform team	A cross-functional team that owns a product or domain end-to-end (technology, data, controls, KPIs), enabling faster delivery and clearer accountability than functional silos.
Straight-through processing (STP)	Automated processing from initiation to completion with minimal manual intervention; humans focus on exceptions and oversight.
Supervisory technology	Technology used by regulators to analyze risk and compliance data more efficiently and at higher scale.
UiPath®	CIBA, Deloitte on Wall Street Partner. ICS, computer penetration standard (DataPrivacy) that that prioritizes data, directions, or results. Limited to 10 characters. ICS consumers Federal protection.

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