



## **Deception Detection Lab Ltd**

**Website: <https://www.ddlltd.com>**

**Analysis of BBC Radio 4's Money Box Episode entitled  
'Mansion House and Council Tax for the Terminally ill'**

**21<sup>st</sup> July 2025**

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## 1.0 Introduction

Deception Detection Lab Ltd (DDL) have been asked by The Transparency Task Force (TTF) to analyse Radio 4's Money Box episode entitled 'Mansion House and Council Tax for the Terminally ill' which aired just after midday on Saturday, 19<sup>th</sup> July 2025.

Radio 4's Money Box shows are targeted at the consumer, as retail investors, with each episode discussing the latest personal finance news for those trying to make the most of their money.

This episode featured Charlotte Clark, FCA Director of 'Consumers and Competition' who was asked a number of questions by the show's presenter, Paul Lewis. The questions concerned forthcoming changes to Financial Services rules and regulations as discussed by the Chancellor in her Mansion House speech on Tuesday, 15<sup>th</sup> July.

The scope of our analysis covers the 'Mansion House' part of the episode, from the start to minute 12. Our brief was to focus on any evidence of signs of deception, specifically anything involving Consumer Protections levels for the retail investor.

The link to the Radio 4's Money Box episode can be found here:

<https://www.bbc.co.uk/sounds/play/m002g2mn>

This report details our findings using Forensic Statement & Linguistic Analysis (FSLA). DDL undertook this analysis on a pro bono basis for the TTF.

## 2.0 Conclusion

As described throughout our Report, this interview between Paul Lewis and Charlotte Clark demonstrates recognised patterns of deceptive behaviour. The language of Charlotte Clark, FCA Director of 'Consumers and Competition', could be designed to obscure controversial policy elements while maintaining plausible deniability.

Clark shows indicators of deception and high sensitivity around the core question of whether the proposed reforms prioritise Business Interests over Consumer Protection.

The key indicators cluster around her claims about *"Targeted Support"* not being sales, and her defensive positioning when questioned about Consumer Protection priorities.

The excessive use of qualifiers ("I mean," "kind of," "you know") combined with pronounced stuttering at critical moments ("the, the, the, the" and "It's, it's a primary objective"), by an otherwise articulate and confident speaker, can suggest that she is struggling to reconcile what she's being asked to defend with her own personal beliefs.

A key moment is when she is asked if Consumer Protection is *"top"*. Her inability to say *"yes"* and move to justifying the growth agenda can reveal the true hierarchy of priorities, despite her stated position. Regulators can *"kind of"* support the growth agenda via Targeted Support, whereby they may not provide all options available to enable consumers to *"kind of"* make the right decisions.

Critically, the emphasis is on the Public and not the Regulators. This is further supported when she acknowledges, *"the economy is struggling with growth"* before adding, *"We need to make sure that*

*we are doing the right things to be able to generate it and if, if there are things that we are doing which are stopping firms from being more productive, being able to invest, being able to support other parts of the economy, then we need to look at that”.*

The linguistic evidence from this interview suggests a Regulator caught between competing pressures, using sophisticated language, which may not be appropriate for the target audience, to obscure uncomfortable truths.

In our opinion, Clark's language patterns reveal the following:

- A genuine uncertainty about the consumer benefits of these reforms
- Clark's awareness of the contradictions between stated consumer protection duties and business-friendly policies
- The defensive positioning when she is challenged on fundamental principles
- Her strategic ambiguity to avoid commitments that might later prove problematic
- Clark is unable to provide concrete operational examples when repeatedly pressed.

While Clark maintains that Consumer Protection remains central to the FCA's mission, her language tells a different story. It speaks of an organisation potentially repositioning itself to serve political and Business Interests, while trying to maintain the illusion of consumer advocacy. She may, therefore, be defending policy she privately questions.

For Consumers, the linguistic analysis suggests caution. When Regulators start hedging their language about protection and speaking enthusiastically about *“leaning into”* growth agendas, the fine print should be read very carefully.

We have noted the following from her words:

- *“Targeted Support”* will likely involve sales motivations and pressures disguised as guidance
- Consumer protection has been de-prioritised in favour of growth objectives
- Investment risks are being downplayed
- The FCA could be repositioning itself to serve business rather than consumer interests
- When asked directly *“But not at the expense of consumers?”* Clark's response is a simple *“Definitely not”*. This contradicts an interview filled with evidence of exactly that prioritisation.

The full implications of these reforms will only become clear over time, but the language used to sell them reveals the true priorities at play.

## 3.0 Our Analysis

### Summary

Our analysis reveals multiple indicators of psychological stress, defensive positioning, and potential deception in Clark's responses.

Key areas of concern include evasive language patterns, inconsistent commitment levels, significant defensiveness when challenged about consumer protection priorities, and an inability to provide concrete examples when pressed on operational details.

Clark frequently uses hedging language that weakens commitment to statements, such as:

- i. "I mean" indicates uncertainty or can be used as an attempt to buy time
- ii. "I think" / "I guess" reduces personal commitment to facts
- iii. "Kind of" can be used as vague, non-committal language in context
- iv. "You know" seeks validation/agreement.

As a fuller example: *"I, I guess it's true of some of the people in your clips, is some people don't do it because they don't know how to. Some people feel **overwhelmed by** it, you know, by, by **the choices**".*

Clark contradicts herself later by adding, *"I think the reforms that we're taking forward at the moment are really about just kind of giving people **more choice** and giving them more support".*

### The Detailed Analysis

When Regulators speak publicly about policy changes, their choice of words, hedging patterns, and defensive responses often reveal more than they anticipated.

A Forensic Statement and Linguistic Analysis (FSLA) of the BBC Radio 4 Money Box interview with Charlotte Clark, reveals deceptive patterns and misleading statements which exposes tensions between stated Consumer Protection priorities and the reality of business-friendly reforms.

Our analysis reveals several areas where she engages in language that includes evidence towards likely deception, be that happening consciously or otherwise, and deliberately or not:

- i. **False Claims about Consumer Protection.** While claiming it remains *"primary,"* her language reveals growth has become the actual priority
- ii. **Misleading Investment Risk.** She attempts to redefine risk as *"volatility"* to downplay genuine loss potential
- iii. **Contradictory Statements about *"Targeted Support,"*** inferring that it is not sales, while describing activities that support a sales function
- iv. **Misdirection.** She uses bureaucratic jargon to avoid direct answers about whether firms will recommend competitors. Her target audience might not understand what she says here.

## Evasion

Clark's responses demonstrate evidence of evasion when pressed on difficult questions. When asked directly whether banks providing "Targeted Support" would recommend competitors' products, she deflects with bureaucratic jargon: *"the responsibilities on the firm are very clear in terms of that they have to ensure that the consumer is meeting their needs"*.

She also deflects with: *"Umm, so in terms of how, how it will work, I mean, the, the, the, the, the responsibilities on the firm are very clear..."*.

The repetitive stutter ("the, the, the, the, the") is indicative of increased tension and anxiety indicative of cognitive overload which is unexpected when people are reporting the truth.

This non-answer is revealing. Rather than a simple *"yes, they will recommend other providers"*, Clark deflects. The phrase *"meeting their needs"* is suitably vague. Whose interpretation of *"needs"* matters? The consumer's or the firm's?

Clark consistently avoids direct answers to specific questions about whether banks will recommend competitors or whether "Targeted Support" is essentially sales. In not saying that banks have/should recommend other banks services, the end result is, *"consumers kind of make the right decisions"*.

The linguistic patterns suggest either inadequate preparation for tough questioning or deliberate obfuscation of potentially problematic policy areas.

## Hedging and Uncertainty

Throughout the interview, Clark employs extensive hedging language that undermines confidence in the reforms:

- i. *"I mean, it was interesting, wasn't it..."* can seek validation which is unnecessary.
- ii. *"I think the reforms..."* indicates uncertainty
- iii. *"I guess it's true..."* shows minimal commitment
- iv. *"My guess is they would be pretty well off..."* shows speculation presented as reasoning.

Forensic Statement and Linguistic Analysis (FSLA) notes that speakers use more hedging language when discussing topics that they are less confident about or lack commitment to. Clark's heavy reliance on these suggests uncertainty in her own mind about the reforms' consumer benefits.

## Consumer Protection

When asked about the fundamental conflict between promoting Business Interests and Consumer Protection, Clark is asked if it (Consumer Protection) is *"top"*? Clark repeats the phrase *"Consumer Protection is still very central"*, but immediately qualifies it via, *"I think"*.

The word *"still"* is linguistically significant as it can imply something that was once true but may be changing. It's akin to a need to persuade. Better to say, *"consumer protection is central."* Her language then appears to contradict this when she says, *"It's, it's a primary objective. Growth is a secondary objective. At the moment, politically, clearly growth is the big issue... and it's important that regulators lean into that"*.

Her stuttering response, *"It's, it's a primary objective"* is indicative of cognitive stress. We would consider how many other *"primary objectives"* there are? She does not say, *"it is the primary objective"*. The repetition and hesitation could indicate she is processing the challenge to her position in real-time and potentially struggling to reconcile the apparent contradiction.

### Deflection

A key indicator noted is in how Clark handles the point concerning investment risk. When challenged about investment risks versus guaranteed returns, she attempts to redefine the conversation: *"But I think there's a difference, isn't there? There's a difference between volatility and risk"*.

This is deflection. When her position is challenged, she changes the terms of the conversation. However, her explanation fails to address the key point, that risk means potential loss, not just volatility. Clark's redefinition attempts to minimise this reality, thereby supporting the government's investment promotion agenda.

Clark shows internal conflict, i.e. conflict in her own mind between acknowledging investment risks honestly and promoting government policy. She honestly admits, *"you can never look to the future and say you will definitely get a better return"* but then promotes investments despite current cash rates exceeding inflation.

### Rollback

When confronted with criticism from the Transparency Task Force about rolling back post-crisis protections, Clark's response is defensive:

*"Well, I mean, I don't agree with, I don't, I was going to say Andy, at the taskforce, Um, yeah, I don't agree with his assessment"*.

The false start, the informal reference to *"Andy,"* and the filler words (*"Um, yeah"*) can be indicative of emotional stress. This isn't the confident response of someone secure in their position, it is the reaction of someone whose authority is being challenged. Clark's response suggests the criticism may have more validity than she's publicly admitting.

### Reframing

Throughout the interview, Clark consistently reframes her language to soften potentially controversial positions:

- i. *"Targeted support"* instead of *"sales advice"*
- ii. *"Proportionate, thoughtful changes"* instead of *"deregulation"*
- iii. *"Rebalancing approach to risk"* instead of *"reducing consumer protections"*

This language allows controversial changes to sound reasonable and measured, but it can also reveal an awareness of that which might be unpalatable.

Logical inconsistencies emerge under pressure:

- i. She claims that Targeted Support isn't sales
- ii. She uses the word "*asking*" and not "*telling*" people within the Financial Services industry how to comply with their regulations. Investors expect the Regulator to tell firms what to do, not ask them to do it and hope they comply
- iii. She does not explain how banks won't promote their own products
- iv. She argues for investment while acknowledging, when challenged, that current cash returns exceed inflation.

### Missing Information

Equally revealing is what Clark doesn't say. She doesn't provide concrete examples of how these reforms will directly benefit consumers. She offers no framework or specific metrics for measuring success.

When repeatedly pressed about whether firms will recommend competitors, she doesn't give a direct answer. Her failure to answer a question is noted several times, making the specific question asked a sensitive one.

When asked direct operational questions, she consistently fails to provide concrete answers.

In response to the question, "*There'll be no sales in it. There'll be no sales... They will just mention SIPPs and say there are loads of providers out there*" **She responds by saying**, "*Umm, so in terms of how, how it will work...*" demonstrating response latency prior to giving a non-answer.

When directly asked if there will be "*no sales*" in the Targeted Support system, Clark provides a lengthy response without saying "*no sales*." This is an evasion technique that suggests the opposite of what's being implied.

In FSLA, avoidance often indicates areas where the speaker knows their position is weak or difficult to defend.

The linguistic evidence reveals likely deception across multiple areas. For example:

- i. False claims in asserting Consumer Protection remains primary, while describing growth-focused behaviour
- ii. Misdirection in avoiding direct answers through bureaucratic language
- iii. Risk minimisation by understating investment risks through linguistic narrative
- iv. Contradictory statements in claiming no sales while describing activities that support a sales function
- v. Avoidance of "no sales" confirmation despite a direct question
- vi. "Targeted Support" is vague to hide a sales component
- vii. Consumer Protection claims can be misleading in respect to the actual priority level
- viii. Implementation specifics are obscured which can prevent accountability
- ix. The denial of regulatory rollback indicates the likelihood of false minimisation of policy changes



- x. Clark demonstrates a notable increase in filler words and repetitive patterns when under pressure and deflects from specific Consumer Protection concerns to general economic growth arguments.

## 4.0 Our Methodology

Forensic Statement & Linguistic Analysis (FSLA) is a method of objective, forensic-level examination of written or transcribed documents to determine if a subject is innocent, guilty, or may be withholding information. All statements are treated as truthful on receipt.

Our methodology also identifies key areas of Linguistic Sensitivity which enable investigations to be focused and for Investigators, Research Analysts and other Analysts to target their enquiries into the specific areas we identify.

We only look at the words used and ignore facts, politics, hearsay and opinions.

DDL teaches these techniques to Law Enforcement and Military Intelligence across the world, as well as other professions such as psychologists, criminologists and forensic support professionals.

Our output is generated manually, involving highly experienced analysts, with over 15 years' experience, who have covered hundreds of cases, from company earnings calls to frauds and murders. We do not use AI in any part of our analysis.

DDL are members of two Industry Bodies, namely the 'International Association for Forensic & Legal Linguistics' (IAFLL) and the 'International Investigative Interviewing Research Group' (IIRG).

## 5.0 Conflicts of Interest

DDL have identified the following conflicts of interest and have mitigated these conflicts of interest accordingly;

- i. The CEO of DDL, Sunil Chadda, is a longstanding consumer advocate in the Financial Services arena.

Sunil is an Ambassador of the Transparency Task Force and a Secretariat Member of the All-Party Parliamentary Group (APPG) on Investment Fraud and Fairer Financial Services, for which the Transparency Task Force is the Secretariat. There is no remuneration or other compensation for either role.

- ii. DDL have strict internal Chinese Walls between those highly skilled Directors and Senior Analysts performing FSLA and all other parts of the business that undertake core business functions, such as sales and company management.

DDL confirms that at no point have the CEO or other staff members, who are not FSLA-qualified, been involved in the analysis undertaken for this assignment. The introduction of facts, news articles, hearsay and opinions only act to 'pollute' our analysis, hence the strict controls.

**Disclaimer**

Without prejudice, we do not represent, warrant, undertake or guarantee that the use of this analysis will lead to any particular outcome or result. We will not be liable in respect of any business losses, including without limitation loss of or damage to profits, income, revenue, use, production, anticipated savings, business, contracts, commercial opportunities, reputation or goodwill.