

# Household Costs Review Hub Ltd Financial Promotions & Marketing Policy

**Effective Date:** 01/04/2026

**Next Review Date:** 01/04/2036

**Approved by:** Devania Pithambra

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## 1. Purpose

The purpose of this policy is to ensure that all **financial promotions, marketing campaigns, and customer communications** are:

- **Clear, fair, and not misleading** (FCA Principle 7, PRIN 6)
- Compliant with **FCA rules**, including DISP and CONC where applicable
- Compliant with **PECR** for electronic marketing communications
- Compliant with **UK GDPR / ICO guidelines** for personal data use

This protects customers, maintains trust, and ensures **regulatory compliance**.

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## 2. Scope

Applies to:

- All employees, contractors, and agents creating, approving, or executing financial promotions
  - All customer communications, including calls, emails, SMS, web forms, and social media campaigns
  - All marketing campaigns, scripts, and promotional material
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## 3. Responsibilities

<b>Role</b>	<b>Responsibilities</b>
<b>Senior Manager / SMF</b>	Approve marketing strategy; ensure resources for compliance; review campaign outcomes
<b>Compliance Lead</b>	Review and approve all financial promotions before release; ensure FCA/PECR/GDPR compliance
<b>Marketing / Campaign Team</b>	Draft promotions according to scripts and compliance guidelines; maintain campaign logs
<b>Staff / Agents</b>	Follow approved scripts and promotional material; escalate concerns

## Role

## Responsibilities

about content or customer responses

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### 4. Approval & Pre-Campaign Checks

- All marketing campaigns must be reviewed and **approved by Compliance Lead** before launch
  - Checks include:
    - Clarity, fairness, and truthfulness of statements
    - Accurate representation of products/services
    - Compliance with **FCA, PECR, GDPR, and ICO guidance**
    - TPS/CTPS screening for calls and electronic marketing
  - Maintain an **Approval Log** with campaign details, approver, and date
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### 5. Customer Consent & Preferences

- Verify **opt-in consent** for electronic marketing communications (email, SMS) in line with PECR
  - Record consent status in **Customer Consent Log**
  - Respect **customer opt-out requests** immediately and update relevant systems
  - Consent review and revalidation conducted periodically
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### 6. Vulnerable Customers & TCF Considerations

- Identify vulnerable customers before campaigns (e.g., financial hardship, language barriers)
  - Ensure promotions are fair, transparent, and do not exploit vulnerabilities
  - Escalate concerns to Supervisor/Compliance Lead
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### 7. Record-Keeping

Maintain the following **for at least 5 years**:

- Approved campaign scripts and materials
  - Approval logs with compliance review
  - TPS/CTPS screening results
  - Customer consent and opt-out records
  - Evidence of TCF and vulnerability checks
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## 8. Monitoring & Review

- Campaigns monitored for adherence to approved scripts and compliance requirements
  - Weekly or monthly QA reviews of agent interactions and campaign performance
  - Reports prepared for Senior Management including any breaches or issues
  - Corrective actions implemented where non-compliance is detected
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## 9. Staff Training

- Induction training on FCA financial promotion rules, TCF, PECR, and GDPR
  - Annual refresher training with testing of compliance knowledge
  - Training records maintained for audit purposes
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## 10. Escalation Procedure

1. Staff identify concerns with marketing materials, scripts, or campaigns
  2. Notify Supervisor / Compliance Lead immediately
  3. Compliance Lead investigates, documents, and applies corrective actions
  4. Escalate serious issues to Senior Manager or FCA if required
  5. Document all actions in **Compliance & Campaign Log**
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## 11. Policy Review

- Reviewed **annually** or when FCA, PECR, or GDPR regulations change
  - Updates communicated to all staff
  - Training updated to reflect policy changes
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**Approved by: Devania Pithambra**

**Position:** Head of Compliance

**Date:** 01/04/2026