FCA FINANCIAL PROMOTIONS CHECKLIST

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Pre-publication checklist

A working sign-off tool for marketers. Run through every prompt before a UK financial promotion goes live, tick each item as you confirm it, one by one.

01 Is it a financial promotion?

- [ ] Treat any communication that could influence a customer's financial decision as a financial promotion.
- [ ] Check every asset in scope: web & landing pages, paid ads, app-store copy, email & push, organic and paid social, influencer content, external decks, calculators, comparison tables and FAQs.

02 Fair, clear & not misleading

- [ ] Balance benefits against risks — don't lead with the reward alone.
- [ ] Confirm it doesn't exploit consumer vulnerabilities or target an unsuitable audience.
- [ ] Write in plain English — strip out legal and technical jargon.
- [ ] Make important information prominent — nothing critical hidden in small print.
- [ ] Remove exaggeration, cherry-picked statistics, misleading comparisons and implied guarantees.

03 Consumer Duty — good outcomes

- [ ] Confirm the promotion supports genuinely good outcomes for customers.
- [ ] Check the messaging can't nudge customers toward poor financial decisions.
- [ ] Match the target audience to the product's complexity and risk level.
- [ ] Strip out "quick win" and "easy money" framing, and unjustified urgency ("act now", "last chance").

04 Risk warnings

- [ ] Include the risk warning specific to this product (e.g. "your capital is at risk"; "past performance is not a reliable indicator"; the FCA crypto warning; representative APR; BNPL repayment consequences).
- [ ] Make the warning as prominent as the benefit — same visibility, never a smaller font.
- [ ] Show it immediately — not hidden behind a click where prominence is required.
- [ ] Keep risk warnings consistent across every channel.

05 Claims, comparisons & performance

- [ ] Confirm every claim is true, provable and up to date.
- [ ] Substantiate high-risk words before use: "best", "no.1", "guaranteed", "risk-free", "cheapest", "highest returns".
- [ ] Don't imply future results from past performance.
- [ ] For comparisons: compare like-for-like, cite sources, and don't omit material differences.
- [ ] Remember: A/B testing and performance optimisation never override compliance.

06 The final sense check

- [ ] Would a reasonable customer fully understand what they're signing up for?
- [ ] Are the risks as prominent as the rewards?
- [ ] Can you prove every claim?
- [ ] Would this stand up to an FCA review in 12 months?

07 Approval & sign-off

- [ ] Confirm the approver is a competent, FCA-authorised person.
- [ ] If your firm is unauthorised, confirm the approver holds explicit FCA permission to approve promotions for unauthorised firms (required since 2024).
- [ ] Record the approval through a documented, auditable process.