





Contents

Policy details	3
Policy governance	3
What is the policy objective?	3
Compliance requirements	4
What are the different types of communications?	5
What is the scope of the policy?	6
What is our approach to managing communications?	7
Who does this policy apply to?	8
What must we do?	8
How do we check we are doing that?	8
Where to find out how to meet the requirements?	12
Version control	12



Policy details	
Policy name:	Customer Communications and Financial Promotions Policy
Date approved:	Updated February 2025. Last annual review November 2024
Version number:	4.1
Level 1 Risk Category:	Conduct Risk
Level 2 Risk Category:	Customer Communications and Financial Promotions Risk
Aligns to Group Policy and Type:	N/A

Policy governance	
Executive Policy Owner/Title:	Adam Lishman, Chief Customer Officer
Policy Owner/Title:	Emma Springham, Chief Marketing Officer
Policy Manager/Title:	Greg Templeton, Senior Manager, Customer Risk
Policy Approval Route:	Executive Policy Owner and Policy Owner
Document Classification:	Internal

What is the policy objective?

The purpose of this policy is to set the bank-wide governance standards, minimum requirements and responsibilities for creating and maintaining customer communications. The policy covers sales and servicing communications, marketing materials and financial promotions, as defined under relevant UK's financial services regulation, delivered across all mediums (e.g. letters, emails, mobile app, social media, delivered verbally by TSB colleagues.)

The policy and associated technical standards provide a consistent approach to the management and control of customer communications and financial promotions, helping enable TSB to meet relevant compliance requirements and act to deliver good outcomes to current and prospective customers.

As an authorised financial services firm regulated by the Financial Conduct Authority (FCA), TSB needs to meet specific regulatory requirements when producing communications and financial promotions, to minimise foreseeable customer harm. To summarise the key requirements, communications and financial promotions must:

- Be fair, clear and not misleading;
- Provide appropriate and accurate information to customers meeting their information needs;
- Enable customers to make effective, timely and properly informed decisions;
- Be tailored where appropriate to reflect needs and vulnerabilities of different target audiences;
- Meet regulatory requirements re format of communications (e.g. durable medium)

Relevant communications, based on purpose, potential for harm, complexity and vulnerability considerations must be tested prior to use and subject to ongoing monitoring to check they're fit-for-purpose, likely to be understood and support good outcomes for customers.

Financial promotions may be the main or only source of information customers base decisions on when considering or purchasing financial services products. This creates increased risk for customers because of the complex and often long-term nature of financial products. Reflecting this increased risk, There are specific, additional regulatory requirements covering the creation and approval of Financial Promotions. The policy sets TSB's definition for financial promotions and approach to meeting these requirements.



We want our communications to help support and protect all of our customers. The policy is designed to mitigate conduct risk, promote consumer understanding and minimise foreseeable customer harm* arising from our communications.

The policy supports and aligns to TSB's defined attitude to conduct risk:

"Our product and service design, sales practices, communications and servicing ensure that products and services are straightforward, transparent, meet the needs and expectations of customers within our defined target market and groups within that - including vulnerable customers, equip customers to make informed decisions and deliver fair value. We act to deliver good customer outcomes by acting in good faith; acting to avoid foreseeable harm; enabling customers to pursue their financial objectives, and by complying with all relevant laws and regulations. We monitor outcomes and where poor outcomes are identified we take appropriate action; remediating customers where necessary, understanding root cause and acting to prevent harm occurring in future."

*TSB defines customer harm as follows: 'Actual Customer Harm will have occurred if a customer has suffered material distress, inconvenience, financial loss or detriment resulting from failures in our product design/pricing, communications, support, business model or controls or where we've failed to mitigate foreseeable harm. Potential harm is recognised where, without intervention, customers are at significant risk of experiencing material distress, inconvenience, financial loss or detriment in future.'

Additional detailed requirements and guidelines can be found in the supporting technical standards.

Compliance requirements

The key regulatory obligations associated with the Customer Communications and Financial Promotions Policy are summarised below. These are the primary overarching compliance requirements applicable to TSB relating to the production and governance of customer communications and financial promotions.

This is not however an exhaustive list of all compliance requirements we need to meet through individual customer communications. There are specific regulatory, legislative or mandatory triggers requirements that mean we need to produce individual customer communications or define clear timescales for producing or delivering certain sales or servicing communications. Examples include specific product sales disclosure requirements, complaint handling timescales and requirements in the FCA's Dispute Resolution (DISP) handbook, the Financial Services Compensation Scheme (FSCS) information sheet and exclusions list, or notification timescales for unpaid items under the Payment Services Regulations (PSR).

Compliance with prescriptive compliance requirements applicable to individual communications are primarily aligned to other relevant policies or customer journeys and therefore not covered below. All breaches of regulation or legislation arising from communications or failure to produce communications will however also be considered as a breach of the Customer Communications and Product Promotions policy for event and where appropriate risk appetite purposes.

- **FCA Final Consumer Duty Principle (2A), Final Rules (PS22/2) and Final non-Handbook Guidance for firms (FG22/2)** – Sets out cross cutting rules on 'Consumer Understanding' and expectations on delivering good customer outcomes through effective, timely communications that meet customer needs, are sufficiently tailored to audience groups where appropriate, are easy to understand and have been subject to testing prior to publication.
- **FCA Mortgage Conduct of Business Sourcebook (MCOBs), particularly MCOB 2.2** - sets rules requirements and guidance for communications and financial promotions of mortgages.
- **FCA Consumer Credit Sourcebook (CONC), particularly CONC 2 and 3** – CONC contains detailed guidance and prescribed regulatory requirements for communicating and promoting unsecured credit products, including distance marketing, the requirement for communications to be fair, clear and not misleading and financial promotions requirements.
- **FCA Banking Conduct of Business Sourcebook (BCOBs), particularly BCOBS 2, 3 and elements of BCOBS 4** – BCOBS contains detailed guidance and prescribed regulatory




requirements for communicating and promoting deposit accounts including current accounts and savings accounts.

- **FCA Senior Management Arrangements, Systems and Controls (SYSC)** – Particularly SYSC 5.1.1 (Competent employees rule) and associated supplementary requirements.
- **FCA Perimeter Guidance manual (PERG)** – Particularly PERG 8 covering financial promotion and related activity.
- **FCA Guidance on Social media and customer communications (FG15/4)** – summarises the FCA's supervisory approach to financial promotions in social media.
- **FCA Non-Handbook guidance on the anti green-washing rule (FG24/3)** – FCA guidance on helping customers make informed decisions in-line with their sustainability preferences.
- **Advertising Standards Authority (ASA) CAP Code** – UK Code of Non-Broadcast Advertising and Direct & Promotional Marketing is the rule book for non-broadcast advertisements, sales promotions and direct marketing communications.
- **ASA BCAP Code** – UK Code of Broadcast Advertising applies to all advertisements (including teleshopping, content on self-promotional television channels, television text and interactive tv ads) and programme sponsorship credits on radio and television services licensed by Ofcom
- **Consumer Credit Regulations** – This set out FCA regulatory expectations from the point they took over as regulator for consumer credit from the Office of Fair Trading in 2014 and the repeal of the Consumer Credit Act 1974 and is made of 6 sets of regulations covering all aspects of the sale of credit including advertising.
- **The Electronic Commerce (EC Directive) Regulations 2002** - The Regulations cover online services provided for remuneration, and extend to services, which are not remunerated by those who receive them, such as those offering on-line information or commercial communications, or those providing search, access and retrieval of data. These cover commercial communications.
- **Lending Standards Board (LSB) Standards of Lending Practice (Retail & Business)** – Voluntary set of lending practices for retail and business that covers Credit Cards, Loans and overdrafts across entire lifecycle of lending with guidance on communication on principles of lending, sales, maintenance and financial difficulty.
- **Information Commissioner's Office (ICO)** – the ICO provides principles through PECR (Privacy and Electronic Communications Regulations) and GDPR (General Data Protection Regulations) on direct marketing, collecting information and respecting people's privacy.
- **The Financial Services Distance Marketing Regulations** – Regulations covering the sale for financial services when not completed face to face e.g. through internet, post or phone, dictates the required documentation and how and when these should be delivered.
- **Payment Account Regulations (PARs)** – Regulations that set the level of consumer protection and promote competition, these specifically cover disclosure of fee information, standards around switching and rules around basic bank accounts.
- **Competitions & Markets Authority (CMA)** – Regulatory body that promotes market competition and tackles unfair behaviour.

What are the different types of communications?

We differentiate between different types of communication as follows:

- **Sales communications** –communications to customers required as part of an agreed sales journey for a TSB product. This will include letters, emails and other communications including regulatory requirements for sales disclosures and immediate post-sales requirements such as cooling-off periods
- **Servicing communications** – Any communications to customers that provide required information about a TSB current product the customer holds or a product the customer has previously held. Examples include changes to terms and conditions, statements, default notices, alerts relating to account balances, maturity statements, and the provision prescribed material such as the FSCS



Information Sheet. Servicing communications also include communications to support and protect customers when problems occur, including service interruptions and responses to customer queries or complaints.

- **Marketing Communications** – The Data Privacy Act (2018) and by extension the ICO defines direct marketing as ‘the communication (by whatever means) of advertising or marketing material which is directed to particular individuals’. This includes any communications that promote bank services, products or the overall brand. Marketing communications cannot be sent to customers without consent. Examples include emails and text messages, social media marketing and postal marketing. The broader term marketing communications includes all Financial Promotions, which need to comply with specific FCA requirements.
 - **Financial Promotions** – A Financial Promotion is defined in section 21 of the Financial Services and Markets Act 2000 and by extension by the FCA as “an invitation or inducement to engage in investment activity”. In the context of a regulated firm this means anything that promotes the brand, its products or anything that invites or attempts to persuade customers to buy the firm’s products.
 - **A Financial Promotion is determined by content rather than intent** – any communication can inadvertently become a financial promotion if it is ‘an invitation or inducement to engage in investment activity’ even if the communication is intended to be purely a servicing message. The more detail about different products and different features, the more likely the communication is to meet this definition.

Both marketing communications and financial promotions financial promotions will be produced in a range of mediums including email, leaflets, audio and video.

What is the scope of the policy?

In-scope: The scope of this policy and associated technical standards covers all customer communications from TSB, delivered across all channels and including delivery or fulfilment by third parties on behalf of TSB. It covers all products and services, all customers (personal and business customers) across all stages of the customer lifecycle, extending from promotion/marketing through sales and servicing journeys, legal contracts and terms and conditions that are provided both pre and post-sale, along with all servicing communications.

Some communications will be ‘always-on’ (i.e. used repeatedly on an ongoing basis) and some will be for use for a defined period, whether this is a one-off servicing requirement or marketing campaign. The policy covers both.

Out of scope: The following are out of scope for this policy: Internal communications (communications to TSB colleagues) that are not classified as financial promotions; Ad-hoc verbal communications with customers (i.e. in the moment, non-scripted discussions between customer-facing TSB colleagues and TSB customers through telephone, video banking or branch channels; Non-scripted interactions with customers through TSB Chat channel; Ad-hoc, one-off communications to individual customers, such as an Executive complaint response..

Channels/Format: This policy applies to all communication channels used to deliver customer communications, including but not necessarily limited to: TSB.co.uk, Direct mail (post), E-mail, SMS text messages, Digital inbox, Digital and online sales journeys, Internet Banking, the Mobile Banking app, Telephone and text relay, scripted calls, branch, conversational banking and video banking interactions with customers, Push notifications, Social Media, TV, radio and press advertisements, billboards and other similar advertising, ATM screens, Digi-screens, aggregators and any internal communications that are classified as financial promotions.

For the remainder of the policy, including the ‘what we must do’ section of this document, the term ‘communication’ or ‘communication(s)’ refers to customer communications falling within the scope outlined above.



What is our approach to managing communications?

Our Customer Communications are owned, initiated and governed by a range of different business units, and they're delivered using a variety of channels and systems, including third party providers. Some letters are printed locally using Hybrid Mail/Go Send', some are automatically triggered and delivered by our core systems and others are subject to more specialist third party print or delivery solutions. This reflects the complexity of managing a modern UK retail bank and serving customers in their preferred channel(s) of choice.

Our specialist teams (e.g. Fraud, Financial Support, Business Banking) know the needs of their customers better than a central team would, so we empower the relevant teams across the business to own and manage their customers communications rather than everything being owned centrally.

Individual business units are therefore responsible for developing and maintaining local communication governance processes, in-line with the requirements set out in this policy.

The exception to this local governance model is any communication that would be classified as 'marketing' by the Information Commissioners Office, or 'Financial Promotions' by the FCA. Given the detailed range of regulatory rules relating to financial promotion content and the increased risks associated with promotional activity, any marketing communication (including all financial promotions) produced at TSB are reviewed and approved centrally by the Customer Risk team and/or our Legal team. This is in addition to local approvals such as the owner of the communication or associated Material Risk Taker (MRT).

TSB has permission from the FCA to approve our own financial promotions. Whilst there is no specific FCA training and competence (TC) requirements for financial promotion approval under the FCA handbook, the 'Competent Employees' rule applies (SYSC5.1.1) – 'A firm must employ personnel with the skills, knowledge and expertise necessary for the discharge of the responsibilities'.

To meet this requirement, the Customer Risk operate a financial promotion accreditation process to provide initial and ongoing accreditation for colleagues in the team involved in reviewing and approving financial promotions and broader marketing communications. Different products are subject to different financial promotion rules. The accreditation process reflects this and the process itself is reviewed annually to check it remains fit for purpose. Aside from our Legal team, only colleagues who are accredited internally under this process can approve financial promotions at TSB. It's important that business units can identify when a communication becomes marketing or a financial promotion so we can consistently follow agreed governance.

We have an agreed style to how we communicate at TSB and with our customers. It's generally a bit more relaxed and conversational, which helps customers understand our communications better. Communications should be written in this style. It's called our 'tone of voice' – there's guidance on tone of voice including a style guide covering abbreviations, grammar and punctuation and a helpful glossary on the [Tone of Voice pages](#) of SharePoint. This does not mean we over-simplify important or required information that helps customers make an informed decision and/or is required to comply with regulation or legislation.

One of the key ways we meet the requirements of the FCA's Consumer Understanding outcome, introduced as part of the Consumer Duty, is through a centralised bank-wide comprehension testing process. We use a third-party provider to support comprehension testing and the process involves a sample of consumers (some might even be TSB customers) reviewing relevant communications before we publish them, answering specific questions and providing us with feedback which helps make the final versions better and more understandable.

The Comprehension Testing process is owned and co-ordinated by the Customer Risk team. Communications which score above a defined threshold for a blended assessment of purpose, potential for customer harm, complexity and vulnerability considerations are subject to comprehension testing. In general, all communications should be evaluated to determine whether comprehension testing is required, although there are some exceptions covered in the detailed policy requirements below.



In addition to locally owned processes and governance, we maintain consolidated bank-wide libraries of our customer communications:

- The Document Assurance Matrix (DAM) is designed to be a list of all 'always on' letters, emails, forms and templates printed locally or centrally. The DAM is maintained by the Mail Services team.
- The Touchpoint library was initially developed as part of the Consumer Duty programme and is broader in-scope than the DAM, also including documented scripting for customer interactions and SMS text messages. The Touchpoint library is maintained by the Customer Risk team.

Additional guidance and supporting information on how we manage communications at TSB can be found in the underlying technical standards and the [Communicating at TSB](#) pages of SharePoint.

Who does this policy apply to?

- This policy applies to all TSB colleagues, but in particular TSB colleagues directly involved in creating, reviewing or approving sales, serving and marketing communications for customers, including financial promotions.
- The policy is directly applicable to Material Risk Takers (MRTs) responsible for business units that create, review and approve communications.
- The policy is applicable to third parties and outsourced providers that are part of the end-to-end production of customer communications, particularly where we are producing financial promotions involving a third party (partnerships; suppliers; white-label products)
- It is applicable to joint ventures and partnerships where any associated communications fall directly within the scope of the policy as outlined above.

Waivers

Waivers to this Policy will be considered. For the definitions, forms to raise requests and guidance refer to the [Policy Waivers](#) page of the [Risk Management Framework](#) SharePoint site.

Breaches

For any events identified please follow the Event process and guidance detailed in the [Risk Event Manual](#). For further guidance and support please refer to the [Events and Breaches SharePoint site](#) and / or Enterprise Assurance.

What must we do?	How do we check we are doing that? (ie Monitoring of the control activity)
<p>Communications Governance</p> <ul style="list-style-type: none"> • Each business unit producing communications must maintain a list of the communications they own (defined by which communications they're responsible for the content / production of), capturing (at a minimum) the named owner, whether the communication is required to meet Legal, Regulatory or Mandatory (LRM) requirements (see below), any associated timescales required for compliance, version control, whether the communication is a financial promotion and the last review date and associated product(s)/services. • Customer journey and product owners are responsible for identifying where individual communications are required to comply with specific legal, regulatory or mandatory (LRM) obligations as part of product sales or servicing activity. Note 	<ul style="list-style-type: none"> • ARM controls covering adequacy of individual business units' local process for approval and ongoing review of communications. • 'General' control on ARM covering Horizon Scanning for new/changing LRM requirements. • Compliance responsibilities consistent with those outlined in Proposition Design and Governance Policy and customer journey compliance mapping (<i>in pilot as at January 2025</i>)



– this can be both for a requirement to issue a specific communication, to include prescribed wording or requirements in the communication or prescribed timescales for issuing the communication.

- Each business unit that own communications must have a fit-for-purpose, documented process in place covering approval and ongoing change/review governance which meets the following minimum requirements – considers relevance and accuracy of communications, checks continued compliance with relevant LRM requirements, checks to see sales and servicing communications do not include content that would make them a financial promotion, sets frequency for review of communications (see below) and defines approval/sign-off and record keeping requirements.
- In all cases, the documented process for communication review and governance should be owned and approved by a Grade F or above (unless otherwise agreed by relevant MRT).
- In all cases, individual communications should be owned and approved by a Grade F or above (unless otherwise agreed by relevant MRT).
- All communications must be reviewed on a regular (recommended annual) basis. Where communications are reviewed to a different or differing frequency, a documented risk-based rationale for this should be in place.
- Material changes to the LRM environment (new/changing LRM requirements) should prompt a review of associated communications outside the regular review schedule, to take necessary steps for TSB to remain compliant with LRM requirements. *(Note – LRM Horizon Scanning requirements are set in the Compliance Framework Policy)*
- All business units owning communications must have a testing programme in place to check communications, including automated communications are delivered as intended to the correct recipients and within required timescales, particularly where covered by LRM requirements.
- Each annual (or to agreed frequency) review of individual communications must include reviewing that the communication complies with all relevant LRM requirements. This includes, but is not limited to changes to associated LRM requirements since the previous review.
- Following review or changes (including withdrawal of communications), owners of communications must provide details and a copy of the updated communication to the Mail Services Team and to Customer Risk.
- Mail Services Team is responsible for maintaining and updating the Document Assurance Matrix (the DAM).
- Customer Risk is responsible for maintaining and updating the Touchpoint library.

- ‘General’ control on ARM that review adequacy of individual business units’ local process for approval and ongoing review of communications.
- Mail Services Secondary controls covering maintenance of DAM.
- Customer Risk/Communications Governance Secondary controls covering maintenance of Touchpoint Library.
- ARM controls relating to OCE process under Customer Servicing and Product Design risk categories and associated secondary controls.
- Additional primary and secondary controls in respect of Proposition Design and Governance policy.
- ARM controls relating to communication reconciliation testing.

ARM Risks and controls for L2 risk category currently under review as part of Risk and control uplift activity and compliance gap analysis for – both expected to conclude Q1 2025. Applicable to all ARM controls in this section and below.



<ul style="list-style-type: none"> • All new communications or changes to existing communications (including withdrawal of communications) should be logged with OCE (Operational Communication and Enablement) • Communications (and associated changes communications may be required to support – e.g. new products, journey change) may also be subject to additional governance requirements including but not restricted to ESPC/MRT approval – <i>for further details see the Proposition Design and Governance Policy.</i> 	
Creating or amending Communications – additional requirements	
<ul style="list-style-type: none"> • All communications should be written in-line with TSB's tone of voice guidelines. • All communications must be developed, changed and approved in-line with local business unit process. • All communications (except ad-hoc communications) must follow the comprehension testing process– <i>see requirements below.</i> • All communications should be assessed against the Customer Impact Assessment Tool. • All LRM communications must be syndicated with Legal prior to approval – Legal will confirm whether they need to review and approve communications on a case-by-case basis. 	<ul style="list-style-type: none"> • ARM controls covering adequacy of individual business units' local process for approval and ongoing review of communications. • ARM controls re comprehension testing (<i>under development as at January 2025</i>) • End-to-end co-ordination and oversight of comprehension testing by Customer Risk/Communications Governance, and associated secondary controls.
Training Requirements	
<ul style="list-style-type: none"> • All colleagues involved in creating or amending communications should have completed the relevant training module(s) within the last 12 months. • Customer Risk (with input from other business units) should maintain a list of TSB colleagues required to undertake communications training module(s) and track completion rates, taking action to highlight or escalate non-completion where required. • Customer Risk and Legal are responsible for maintaining appropriate processes to train, upskill, review and confirm that relevant colleagues involved in the sign-off of financial promotions have appropriate skills, knowledge and expertise. <i>See Marketing Communications and Financial Promotions requirements.</i> • Customer Risk are responsible for setting bank-wide training requirements for customer communications and reviewing training material on a regular basis so it remains up to date and relevant. 	<ul style="list-style-type: none"> • Training response rates monitored and tracked by Customer Risk/Communications Governance. Discussed with stakeholders at L2 communications forum. • Secondary controls operated by Customer Risk/Communications Governance re communications. • Training materials reviewed annually. • 'General' control on ARM covering Horizon Scanning for new/changing LRM requirements.
Communication Delivery and Preferences	
<ul style="list-style-type: none"> • The owners of customer journeys should design and deliver adequate processes as part of sales and servicing journeys to enable customers to capture and update communication preferences, including any associated 	<ul style="list-style-type: none"> • ARM controls covering contact permissions. • Local secondary controls operated by individual business units.



<p>vulnerability/accessibility requirements easily and without experiencing unreasonable barriers.</p> <ul style="list-style-type: none"> • Business units must have appropriate controls and/or processes in place to meet relevant communication preferences for customers and check that processes are working as intended/expected. 	
Marketing Communications and Financial Promotions	
<ul style="list-style-type: none"> • All business units must be able to identify which of the communications they own are a financial promotion as opposed to a sales or servicing communication. • All marketing must be delivered in-line with customers' agreed marketing permissions. • As part of ongoing change/review governance, each business unit that own communications must review sales and servicing communications for content that would make them a financial promotion. (see <i>Communication Governance requirements above</i>). • All marketing communications promotions must follow defined marketing process, as defined in the TSB Brand and Marketing Campaign Handbook. This includes adherence to approval requirements outlined in the handbook. • All financial promotions must be fair, clear and not misleading and act to deliver good outcomes for customers. <ul style="list-style-type: none"> - All financial promotions must meet the minimum requirements set out in the policy and associated technical standards. • Any marketing communications determined as 'high risk' or 'severe' as defined by the TSB Brand and Marketing Campaign Handbook must also reviewed and approved by Legal. • All marketing communications should be classified as 'always on' communications or not. Where marketing communications are not 'always on' they should have a documented shelf life after which they should not be used prior to review to check they remain compliant and fit-for-purpose. • All marketing communications and financial promotions are subject to the comprehension testing process (see requirements below). • Customer Risk and Legal are responsible for maintaining appropriate processes to train, upskill, review and confirm that relevant colleagues involved in the sign-off of financial promotions have appropriate skills, knowledge and expertise. • Customer Risk and Legal must not allow colleagues without the appropriate skills, knowledge and expertise approve financial promotions. • Customer Risk and Legal can only approve financial promotions or marketing communications relating to TSB products or services, or those of specifically agreed third parties (partnerships; suppliers; white-label products) 	<ul style="list-style-type: none"> • ARM controls covering adequacy of individual business units' local process for approval and ongoing review of communications. • ARM controls covering financial promotions review and approval. • ARM control covering marketing permissions. • Regular review of TSB Brand and Marketing Campaign Handbook. • Annual review of technical standards. • Financial Promotions approvers in Customer Risk subject to training and accreditation. • Documented financial promotions approval process, subject to regular review. • Documented financial promotions approval accreditation process, subject to regular review. • Legal input and involvement in financial promotions approval process. • End-to-end co-ordination and oversight of comprehension testing by Customer Risk/Communications Governance, and associated secondary controls.



<ul style="list-style-type: none"> • The final version of any financial promotion involving an agreed third party (partnerships; suppliers; white-label products) should be approved by both firms prior to publication. 	
Comprehension Testing	
<ul style="list-style-type: none"> • Customer Risk maintain a fit for purpose, bank-wide comprehension testing process to meet relevant FCA's Consumer Duty requirements. • Customer Risk team is responsible for operating and overseeing the bank-wide comprehension testing process, providing feedback to owners of individual communications. • Owners of communications must follow the comprehension testing assessment process to confirm whether new communications and communications being reviewed/updated should be subject to comprehension testing to issuing these to customers. <i>The exception to this is for minor changes to existing communications which have already been subject to comprehension testing and ad-hoc communications (see below)</i> • Any communications score above a defined threshold for a blended assessment of purpose, potential for customer harm, complexity and vulnerability considerations must be subject to comprehension testing. • Ad-hoc communications for individual customers (e.g. complaint/exec complaint responses) are not formally within scope of the comprehension testing process, however standardised paragraphs or sections consistently used within ad-hoc letters should be subject to comprehension testing. • The relevant MRT needs to approve the issuing of urgent communications where customer harm would realistically occur as a result of delaying issuing the communication to complete comprehension testing. • Owners of communications are responsible for setting the specific content questions for each communication as part of comprehension testing. • Owners of communications are responsible for defining the target market for each communication as part of comprehension testing, particularly where individual communications disproportionately impacts or is aimed at vulnerable customers. • Owners of communications are required to respond to feedback arising from the comprehension testing process, particularly where communications fall below the defined minimum thresholds for understanding (<70% of respondents correctly answering content questions; 25% of verbatim comments from respondents indicating a clear feedback theme) • The relevant MRT needs to approve the issuing of communications which fall below the defined minimum thresholds for understanding defined in the process (<70% content questions, >25% theme from verbatim comments). 	<ul style="list-style-type: none"> • ARM controls re comprehension testing (<i>under development as at January 2025</i>) • End-to-end co-ordination and oversight of comprehension testing by Customer Risk/Communications Governance, and associated secondary controls. • Documented comprehension testing process within technical standards, subject to regular review.



Where to find out how to meet the requirements?

[Customer Communications Technical Standards](#)

[Comprehension Testing Technical Standards](#)

[TSB Learning Module](#)

[Communicating at TSB Site](#)

[The Document Assurance Matrix \(The DAM\)](#)

[Touchpoint Library](#)

[Tone of Voice Guidance](#)

[TSB Brand and Marketing Campaign Handbook](#)

Version control

Version Number:	Author:	Approval Date:	Effective Date:	Comments:
V1.0	Emma Stacey, Elaine Flanagan	07/02/20	20/02/20	Approved by Pete Markey and Robin Bulloch. New policy; replacing elements of Customer Treatment policy.
V2.0	Elaine Flanagan	2021	2021	Revisions to include Customer Harm and changes to process, personnel and the L2 category controls.
V2.1	Susan Kean			Policy Owner update
V2.2	Elaine Flanagan	September 2022		Executive owner update
V3.0	Elaine Flanagan	June 2023		Aligned to new technical standards, introduction on New Consumer Duty and revised risks and controls.
V3.1	Adam Beddoe	October 2023	30/10/23	No changes but aligned approval to annual review cycle
V4.0	Greg Templeton, Adam Beddoe, Sarah-Jane Boardman-Treacy	25/11/24	01/12/24	Amendment to Policy Owner and Policy Manager. Title changed from 'product promotions' to 'financial promotions.' Full review and rewrite of policy under annual review – more detailed prescribed requirements for local communications governance, comprehension testing process clarified and minimum threshold requirements added. Approach to communications and compliance requirements sections added to policy.



V4.1	Greg Templeton	03/02/25	03/02/25	Out of cycle update following Communications Compliance Oversight review – additional requirements added to communications governance section: Grade F ownership requirements (comms and processes); additional clarification re LRM changes prompting out-of-cycle review of comms and that LRM compliance should form part of each review of comms. Journey owner responsibilities re comms preferences updated.
------	----------------	----------	----------	--

/