

Briefing on Central Bank Consumer Protection Code 2025

24 April 2026 – Not to be taken as legal advice



Overview

- The Central Bank of Ireland's revised Consumer Protection Code (CPC 2025) came into force on 24 March 2026, replacing the CPC 2012 in its entirety. The code seeks to modernise consumer protection for the digital era.
 - The Code is in force, but interpretation is still being developed. The guidance is a living document which can be updated on the basis of industry experience.
 - The Code and related Guidance material is [available here](#)
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CHANGES IN THE NEW CODE FOR ADVERTISING

- As a general point, the main focus has been a move towards sector specific rules (e.g. products for mortgages / insurance / etc). These are outlined in the body of the main Code.
 - With regard to advertising, in the CBI's view, there has no major overhaul of the previous Advertising Section of the 2012 Code. Most of the "nuts and bolts" remains the same. But there is now a focus on securing consumer interests from the outset.
 - In addition there new rules have been introduced to keep the Code up to date, including in the areas of:
 - Digitalisation
 - Protection in Vulnerable Circumstances
 - Informing Effectively
 - Unrealistic Expectations
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FOCUS ON REGULATED ENTITIES

- The focus of the Code is on the regulated entities which fall under the CBI's authority (Banks / Mortgage Providers / Insurance Providers / etc). They need to have systems in place to ensure compliance and to handle complaints.
- The CBI has no jurisdiction over lapi agencies, however if an advertisement was created which was wholly inappropriate then there could be a problem, so there is a need to be aware of the key provisions, as outlined in:
 - [Guidance to the Code: Section 3.7 on Advertising](#) (see Annex)
 - [General Protection Requirements](#) (Part 2, Chapter 9 on Advertising)
- It was noted that some of the language in the Code is written with the assumption that the clients will have their own in-house marketing teams and

the language is directed to those groups. Iapi agencies would fall under 'outsourcing' requirements.

FURTHER ENGAGEMENT

- The CBI note that the Guidance is a living document. It has been updated over the last few months, and they are happy to do so again if required. They recognise that there will be unintended consequences for many beyond the regulated entities, which was their primary focus area.
 - The CBI are happy for Iapi to collate examples of problems and to continue engagement, and they could also provide a briefing for Members on this issue if helpful.
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ANNEX: SUMMARY OF CONSUMER PROTECTION CODE GUIDANCE ON ADVERTISING

Core principle

- Advertising must be "clear, fair, accurate, and not misleading"
- Claims and offers must be balanced with information on risks, fees, and charges
- Information must be current; outdated ads should be discontinued or deleted

Scope

- Applies to all advertising formats: TV, radio, print, outdoor, online, social media, websites, search engine sponsorships, promotional materials, competitions, and advertorials
- Sponsorship material (brand name only, no specific product/service promotion) is exempt

Warning statements

- Must be prominent, in specific font size, bold, and in a box
- Product-specific wording is set out in the relevant chapters of the Consumer Protection Regulations, not a single advertising chapter
- Not required where the ad only names the service or invites further discussion (and doesn't reference benefits)

Social media and finfluencers

- All social media communications are in scope, including those in public environments (Instagram, Reddit) and private (WhatsApp, Telegram) platforms
- Time-bound content (e.g. Instagram stories) must still comply
- Finfluencers with a commercial relationship to a firm must comply with the Code. The firm is responsible for finfluencer posts and must ensure compliance

Advertising Governance (by regulated entity)

For the regulated entity:

- Firms must have appropriate governance arrangements in place for all aspects of product development, promotion, distribution, and post-sale services of their advertising to ensure they comply with the code.
- the Board and Senior Management, compliance function and marketing function (as appropriate), work closely together to ensure that a finalised advertisement complies with the Code.
- Firms should have appropriate compliance arrangements for advertising. This includes monitoring advertising on an ongoing basis to ensure ongoing compliance with the Code, developing processes for issue escalation, evaluating advertising campaigns regularly, and maintaining evidence of these evaluations.
- Regulated Entities are encouraged to put in place “adequate control mechanisms” for third-party engagements (listed in 3.7.15)
 - Clear accountability needed for design and approval of ads
 - Ongoing monitoring, issue escalation processes, and regular campaign evaluation required
 - Audit testing of approval processes, with records of frequency, personnel, and next test date
 - Controls to release ads only after confirmed compliance
 - Additional controls when processes change or staff turn over
 - Complaints analysis and internal escalation processes
 - Formal training logs for staff who design and approve ads
 - Procedures reviewed at least annually

Hyperlinks

- Cannot use hyperlinks to hide risks or regulatory information behind a click while putting favourable content up front
- Must be displayed prominently
- Must link directly to all required information on a single webpage

Presentation

- No watermarks covering text
- No page bleeding — text must fit the assigned space so required disclosures (e.g. on a bus ad) aren't obscured
- Content must not imply Central Bank endorsement of the firm or its products

Identifying ads as ads

- All ads must be identified as advertisements
- On social media, use #ad; where context isn't clear, use #Sponsored or #Promotion
- Disclosure must appear at the start of the content, not buried at the end

Benefits and risks

- Risks must be given equal prominence to benefits — same location, font size, colour
- Risks must sit in the main body, not small print
- No exaggeration of benefits or unrealistic expectations
- Full disclosure of fees and charges required in the main body
- Space or cost limitations are not an acceptable excuse
- Images must be consistent with the product (e.g. no implying cover not actually provided)
- Warning statements must align with actual product features (e.g. capital loss risk on early encashment)
- Retail intermediaries must be clear about indirect access to product providers

Annual percentage rate

- Must state whether the rate is fixed or variable
- For fixed rates, the term must be specified along with the rate that applies afterwards
- Acceptable to state that the prevailing variable rate at the time will apply

Price-specific advertising

- Key information and qualifying criteria must accompany the quoted price

- TV: voiceovers or screenshots can convey key information, understandable on first viewing
- Websites: qualifying criteria must appear alongside the price
- Social media: link directly to a product-specific webpage with required information
- References to "terms and conditions" should include a direct link to the relevant page

Box 5: Price specific advertising and qualifying criteria

TV

TV advertisement voiceovers can be used to relay the key information and qualifying criteria relating to the content of the advertisement. Firms can also use TV screenshots to display key information and qualifying criteria to allow the consumer to read the information with ease. A viewer should be able to easily understand the verbal or written content on first viewing.

Websites

All key information and qualifying criteria about availing of the product or service at the price quoted must be stated alongside the price quoted to meet the requirements of the Code.

Social Media

Key information and qualifying criteria relating to the advertised product or service should be available on a product specific webpage linked directly³⁶ from the online/social media page to meet the Code's requirements.³⁷

Where a firm refers to 'terms and conditions' in an online advertisement it is recommended that the advertisement includes a direct link to the relevant terms and conditions webpage.