Consumer Protection Rule Book

Fair dealing, client agency, professional diligence and accountable Total Wealth Planning

Version 2.0 - 26 August 2026

Applies to	Academy of Life Planning Limited and, where incorporated by agreement, Academy-accredited or licensed practitioners using Academy methods, branding or professional infrastructure.
Legal focus	UK consumer law, fair commercial practices, professional diligence, contract fairness, data protection and clear professional boundaries.
Important	This is the Academy's own rule book. It is not a rule book issued or approved by the Competition and Markets Authority (CMA), FCA, ICO or any professional body.

1. Status and purpose

This Rule Book sets the Academy's minimum standards for fair, transparent and professionally diligent dealings with consumers and professional users. Its purpose is to protect client agency, prevent avoidable harm, make commercial relationships understandable, and ensure that people can distinguish clearly between education, planning, decision support, specialist advice, regulated activity and product intermediation.

The former October 2024 document was titled the 'CMA Rule Book'. That title is retired. The CMA does not supervise the Academy firm-by-firm and has not approved this Rule Book. The Academy is subject to applicable UK consumer law, which is enforced by public bodies including the CMA and Trading Standards.

This Rule Book should be read with the Academy's Website Terms, Privacy Notice, complaints procedure, professional Planner Agreement, service-specific terms and any applicable licence or client agreement.

2. Core principles

Principle	Academy standard
Agency before dependency	We design services to increase a person's ability to understand, choose and act, rather than creating unnecessary dependence on a professional or product provider.
Whole-person, total-wealth perspective	Planning may consider human capital, work, business, property, pensions, cashflow, family, resilience, purpose and other forms of wealth. Regulated retail investment activity is only one possible component.
Understand first; decide second; transact last	Where a transaction is eventually required, understanding and decision quality should precede intermediation.
Truthful representation	We describe services, qualifications, accreditation, permissions, fees, risks and limitations accurately and without exaggeration.
Professional diligence	Services must be provided with the care, skill, competence and attention reasonably expected for the work undertaken.
Proportional expertise	Specialists should be involved where the issue requires their competence, qualification or statutory permission.

	Expertise is brought to the problem rather than assumed to belong to one professional.
Accountability	Operating outside a particular regulatory perimeter does not remove responsibility. Contract, consumer law, negligence, professional standards and other legal duties may still apply.

3. Consumer-law framework

From 6 April 2025, the unfair-commercial-practices provisions in Chapter 1 of Part 4 of the Digital Markets, Competition and Consumers Act 2024 (DMCC Act) replaced and updated the Consumer Protection from Unfair Trading Regulations 2008 for new commercial practices. The Academy therefore treats the DMCC Act, rather than the former 2008 Regulations, as the primary current framework for unfair commercial practices.

The Academy must not:

- engage in a misleading action or present materially false information;
- omit material information that an average consumer needs to make an informed transactional decision;
- use harassment, coercion or undue influence to impair a consumer's freedom of choice;
- engage in a commercial practice prohibited in all circumstances by Schedule 20 to the DMCC Act;
- misrepresent accreditation, approval, endorsement, regulatory status, consumer rights or the origin of reviews;
- hide mandatory charges or present a price in a way that materially understates the total amount the consumer must pay; or
- use contract terms or notices which create a significant unfair imbalance against a consumer.

The Academy will also have regard to current CMA consumer-law guidance, including guidance on unfair commercial practices, price transparency, fake reviews, fair contract terms and use of AI in consumer-facing activity.

4. Clear description of the service

Before a consumer commits to a paid service, the Academy must give clear information about the nature of the service, what is included, the price, payment frequency, material limitations, cancellation arrangements, and any important dependency on third-party systems or specialists.

Descriptions should distinguish, where relevant, between:

- financial education and explanatory information;
- financial planning and structured decision support;
- coaching, consulting or mentorship;
- AI-assisted tools and self-directed planning;
- professional judgement supplied by a human practitioner;
- regulated investment advice or regulated pension transfer advice;
- legal, tax or accountancy services; and
- implementation, transaction execution, custody, product provision or other intermediation.

The fact that a service is tailored to an individual's circumstances does not, by itself, justify describing it as regulated investment advice. Equally, a practitioner must not rely on a label such as 'education', 'planning' or 'coaching' where the substance of what is actually done crosses a statutory regulatory boundary.

5. FCA perimeter and specialist boundaries

The Financial Conduct Authority regulates specified activities. The FCA perimeter is a boundary relevant to particular activities; it is not the organising boundary of the total-wealth landscape.

The Academy itself does not provide FCA-regulated investment advice or arrange regulated investments. In particular:

- we do not recommend that a consumer buy, sell, hold or otherwise act in relation to a particular regulated investment;
- we do not provide a regulated personal recommendation to transfer, convert or retain safeguarded pension benefits;
- we do not execute, arrange or bring about regulated investment transactions on behalf of clients;

- we do not hold client investment money or custody investment assets; and
- we do not receive product commissions or asset-under-management remuneration for Academy planning services.

Where FCA-regulated advice or implementation is required, the consumer should use an appropriately authorised firm. Where legal, tax, accounting or other specialist advice is required, the consumer should use an appropriately qualified professional for that part.

Academy accreditation, membership or licensing must never be represented as FCA authorisation or as a substitute for statutory permission.

6. Pricing, invitations to purchase and subscriptions

Prices must be presented clearly and prominently. Any mandatory fee, tax or charge known at the point of an invitation to purchase must be included or disclosed in accordance with applicable law. Optional extras must not be pre-selected or added without proper consent.

For recurring services, the Academy must make clear before purchase:

- the amount and frequency of payments;
- whether the service renews automatically;
- how and when the consumer can cancel;
- what happens to access after cancellation;
- how price changes will be communicated; and
- any statutory cooling-off or cancellation right that applies.

The Academy will update its subscription processes when the specific subscription-contract provisions of the DMCC Act come into force.

7. Marketing and communications

Academy marketing must be capable of substantiation. In particular:

- claims about qualifications, accreditation, experience, results, independence, cost savings, consumer protection and regulatory status must be accurate;
- free services must genuinely be free apart from unavoidable charges clearly disclosed by law;
- scarcity, countdowns, deadlines or limited availability must be genuine;
- paid, sponsored, affiliate or incentivised promotional content must be recognisable as such;
- marketing must not exploit fear, distress, bereavement, vulnerability or financial loss;
- comparisons with regulated advisers, product providers or other professions must be fair and not misleading; and
- electronic direct marketing must comply with applicable privacy and electronic-communications law.

8. Reviews, testimonials and social proof

The Academy must not submit, commission or publish fake consumer reviews, suppress negative reviews in a misleading manner, or disguise an incentivised review as independent. Where a testimonial has been provided by a real client or practitioner, it must not be edited so as to create a materially misleading impression.

If a testimonial is exceptional or not representative of typical outcomes, surrounding presentation should not imply that the same result is guaranteed.

9. Vulnerability, distress and financial harm

A person may be vulnerable because of bereavement, illness, disability, low financial capability, coercion, fraud, financial abuse, acute distress, major life change or other circumstances. The Academy's response should be proportionate to the person's needs without removing their agency.

Where vulnerability is apparent, practitioners should consider:

- slowing the process and checking understanding;
- using clear language and avoiding unnecessary technical pressure;
- encouraging the involvement of a trusted supporter where appropriate and consented to;
- avoiding urgency unless there is a genuine time-critical risk;

- signposting specialist debt, safeguarding, legal, medical, crisis or regulated financial support where needed; and
- recording material safeguards and reasons for significant decisions.

10. Client decision support and professional judgement

The purpose of decision support is to improve the quality of a client's thinking, not to disguise a recommendation that the practitioner is not competent or permitted to give.

A good decision-support process should, where relevant:

- identify the decision actually being made;
- separate facts from assumptions and opinions;
- make material uncertainties visible;
- explain realistic options and trade-offs;
- identify irreversible or high-consequence choices;
- explain when specialist advice is required or sensible;
- avoid steering the consumer towards a particular product unless appropriately authorised to do so; and
- leave a clear record of the client's decision and the basis on which it was made.

11. Pension decision support

Pension education may explain scheme features, guarantees, inflation protection, survivor benefits, access rules, taxation concepts, transfer mechanics, sequencing questions and general risks. It may help a person organise information and formulate questions.

It must not become a regulated personal recommendation to transfer, convert or retain safeguarded pension benefits where the practitioner does not hold the required permission. Where regulated pension transfer advice is legally required or otherwise appropriate, the consumer must be directed to an appropriately authorised pension transfer specialist.

12. AI-assisted tools and digital services

AI may support explanation, organisation, scenario exploration, drafting and structured thinking. It must not be represented as infallible, as an FCA-authorised adviser, or as a substitute for human judgement where professional review is required.

For consumer-facing AI tools, the Academy will:

- describe the tool's purpose and material limitations;
- encourage users to verify significant facts and calculations;
- design prompts and interfaces to minimise unnecessary personal data;
- avoid dark patterns or manipulative interface design;
- make clear when content is AI-generated or substantially AI-assisted where that fact is material;
- maintain appropriate human escalation routes for paid professional services; and
- review consumer-facing AI use against current consumer-law, privacy and safety guidance.

13. Data protection and confidentiality

Personal information must be processed lawfully, fairly, transparently and proportionately. The Academy's Privacy Notice governs the Academy's own processing. Professional users remain responsible for their own privacy notices, lawful bases, confidentiality obligations, data minimisation and security.

Sensitive financial, health, identity or fraud-related information should not be collected merely because it might be useful. The minimum information reasonably necessary for the purpose should be used.

14. Conflicts of interest, referrals and remuneration

Any financial or non-financial interest that could reasonably influence a recommendation, referral or presentation of options must be identified and managed.

Where a referral is made:

- the reason for involving the specialist should be explained;

- the consumer should understand whether they are free to choose another provider;
- any referral fee, commission, reciprocal arrangement or other material benefit should be disclosed before the consumer acts on the referral;
- the Academy or practitioner must not imply that it guarantees the specialist's work unless it has expressly assumed that responsibility; and
- regulated activity must remain the responsibility of the appropriately authorised person or firm carrying it out.

15. Academy accreditation and practitioner representations

A Total Wealth Planner or other Academy-accredited practitioner must describe Academy status accurately. Academy accreditation indicates completion of relevant Academy requirements and continued compliance with applicable Academy standards; it does not certify universal competence.

Practitioners must not:

- describe themselves as FCA-authorised merely because they are Academy-accredited;
- use 'authorised' without making clear the authorising body where ambiguity could arise;
- claim Academy accreditation gives permission to perform a regulated or reserved activity;
- misstate qualifications, professional-body membership, disciplinary history or insurance status; or
- represent Academy software or accreditation as government-approved or regulator-endorsed.

16. Complaints, correction and redress

Complaints are treated as information about possible service failure, misunderstanding or unfairness. A consumer does not lose rights by complaining informally first.

The Academy's minimum complaints standards are:

- make the complaints route easy to find;
- acknowledge a formal complaint promptly;
- investigate the substance rather than defend the wording of the complaint;
- correct clear factual errors or misleading representations promptly;
- provide a reasoned written outcome within the published complaints timetable;
- explain any available external route accurately, without implying that the CMA is an individual ombudsman; and
- preserve the consumer's statutory and contractual rights.

Academy planning services described as outside the FCA perimeter are not thereby covered by the Financial Ombudsman Service or Financial Services Compensation Scheme. Consumers may nevertheless have rights under contract, consumer law, negligence and other applicable law.

17. Professional indemnity and financial responsibility

The Academy and professional practitioners must not imply that absence from a particular statutory compensation scheme means absence of accountability. Where professional indemnity insurance is maintained, statements about its scope, limits or beneficiaries must be accurate.

Accredited practitioners are responsible for maintaining insurance appropriate to the activities they actually undertake where required by law, professional rules, client agreement or Academy standards.

18. Records and evidence

The Academy and practitioners should retain proportionate evidence of material matters, including:

- the service the consumer purchased and the price represented;
- significant disclosures and conflicts;
- material facts supplied by the consumer;
- the scope and limits of professional support;
- important assumptions, calculations and sources;
- significant referrals or specialist escalations;
- consents required for data use or marketing; and
- complaints, corrections and their resolution.

Records should be sufficient to explain what happened without turning every consumer interaction into a regulated-advice file where no regulated advice was provided.

19. Quality assurance and breaches

The Academy may monitor its own services and licensed professional use of its brand, tools and accreditation to protect consumers and the integrity of the system.

Depending on seriousness, a breach may result in:

- coaching, correction or additional training;
- a requirement to amend misleading marketing or client materials;
- temporary restrictions on use of Academy branding or tools;
- suspension or withdrawal of Academy accreditation or licence;
- termination of a professional agreement; or
- referral to an appropriate regulator, professional body, law-enforcement body or other authority where legally or ethically necessary.

Before a permanent professional sanction, the Academy will normally tell the practitioner the substance of the concern and give a reasonable opportunity to respond, except where immediate action is required to reduce a serious risk.

20. Governance and review

This Rule Book will be reviewed at least annually and sooner where there is a material change in consumer law, technology, Academy services or professional standards. Changes should improve clarity or protection and should not be used retrospectively to rewrite the contractual basis on which a completed service was supplied.

The Academy may publish supporting standards, checklists and practice notes. Where a supporting document conflicts with this Rule Book, this Rule Book prevails unless the later document expressly states that it amends a specified rule.

21. Definitions

Term	Meaning
Academy	The Academy of Life Planning Limited.
Consumer	An individual acting for purposes wholly or mainly outside their trade, business, craft or profession.
Planner / practitioner	A person providing planning, education, coaching, consulting, decision support or related professional services.
Total Wealth Planning	A whole-person planning approach capable of considering financial and non-financial forms of wealth and the interaction between them.
Regulated activity	An activity for which UK law requires an applicable statutory permission or status; context determines which regulatory regime applies.
FCA-regulated investment advice	A regulated personal recommendation concerning a particular investment or other regulated activity within the FCA perimeter, depending on the applicable legislation and facts.
Academy accreditation	A private Academy professional status. It is not FCA authorisation or government approval.
Material information	Information an average consumer needs in context to make an informed transactional decision.
Professional diligence	The standard of skill and care reasonably expected from a

	professional acting in the relevant field and circumstances.

22. Contact and complaints

Legal name	The Academy of Life Planning Limited
Company number	08016568
Address	9 Franklin Way, Spilsby, Lincolnshire, PE23 5GG, United Kingdom
Email	steve@academyoflifeplanning.com
Telephone	+44 (0)7850 102070
ICO registration	ZA502687

External consumer-information routes

Consumers may obtain independent information about consumer rights from Citizens Advice and may report relevant matters through the appropriate Trading Standards route. The Competition and Markets Authority is a public consumer-law enforcer; it is not an individual complaints ombudsman for Academy services.

23. Effective date

Version 2.0 takes effect on 26 August 2026 and supersedes the Academy of Life Planning 'CMA Rule Book' dated 1 October 2024.