

Bosch Car Service – Consumer Code of Practice

Audit March 2016

Background information

There are currently 491 members in the Bosch Car Service network and 48 new members joined the network throughout 2015. The Bosch Consumer Code of Practice continues to provide enhanced protection for consumers in the vehicle aftermarket. It is one of the most established of all of the Consumer Codes, having been operational now for over a decade.

The unique position that Bosch is in allows it to monitor and police the code very effectively. As it is not a trade association, breaches of the code can be the equivalent of breaches of contract (often leading to swift removal of the scheme for non-compliant garages).

Over the last year Bosch has introduced a number of new initiatives to improve the experiences of their customers. These include re-writing the code to incorporate ADR information and a fundamental review of code compliance among members. Bosch is also in the process of re-launching its website to make it even more user-friendly.

In addition, Bosch is now actively seeking a Trading Standards Primary Authority Partner to underpin the work, materials and training provided to members with legislative protection.

Audit Process

A qualified Trading Standards Practitioner from the Chartered Trading Standards Institute carried out a desktop audit. The audit included interviews with Bosch and focused on the following areas:

- Member application process including checks carried out on prospective businesses
- Member auditing-content and process
- Terms and conditions and other pre-contractual Information
- Marketing and advertising by member businesses
- Sanctions for non-complaint member businesses
- Customer service provisions (including support for vulnerable consumers)
- Consumer complaints process (including ADR)
- Customer satisfaction
- Outstanding issues/matters arising from the last audit in February 2015.

Audit Summary

The Bosch Car Service Code is working very effectively and Bosch is constantly trying to improve the code and the way that garages interact with their customers. During the audit interview, Bosch stated that work is on-going to improve customer understanding of the code and what can be expected of Bosch garages.

It was noted that Bosch does not currently display its full code on its website, as changes to the code (in respect of ADR) are imminent. There was instead a summary of the areas the code covers on the Bosch website.

Recommendation:

Consumers must have access to the current consumer code. It would be helpful to consumers if the code is available on the Bosch website, when the amendments have been completed and approved by CTSI.

Code sponsors are required to produce a written report annually on the operation of the code. Some of the information required is being displayed on the Bosch website but the full report for 2015-16 was not complied.

Action:

The annual report should be published as soon as practicable after each anniversary of the code achieving approval. It must cover all aspects of the operation of the code of practice including compliance checks, sanctions for non-compliance and performance indicator information. Formats are available from CTSI.

New Members

New member applications were reviewed. There are clearly robust procedures in place to process applications, although differences in the level of detail recorded between auditors was noted.

It was previously noted that the welcome pack provided was out-of-date (particularly in respect of references to consumer protection legislation). It was noted that Bosch had planned to refresh the pack during 2014 and this has now been completed.

It was also noted previously that the legislative element of the pack had been withdrawn and was to be refreshed once specific advice on the implications of the Consumer Rights Bill were known – this has now also been addressed.

Existing Member Inspections/Audit

287 quality service audits were carried out in 2015, equating to 58% of the network. Bosch continues to audit members on a three-year cycle with visits carried out independently by SGS Ltd. It was previously noted that on occasions follow up visits were not carried out in a timely manner. This has now been addressed via the

introduction of improvement plans and the appointment of new personnel to oversee this process.

A number of member audits were reviewed. A good system is in place to capture a range of data, including compliance with the code of practice.

Observation:

It was noted that on two occasions members were found not to be displaying prices for work. At the same time they were found to be in compliance for the part of the code that requires customers to fully understand the costs of work. Bosch is aware of this issue and is currently reviewing auditing arrangements for members. The members identified are also being brought into compliance.

Member websites were examined as part of this process and one member was found not to have a website. Bosch explained that this member was in the early stages of being removed from the scheme.

The audit also looked at evidence of staff reviews on site. These were in the main positive, but did identify some issues around the purchasing of Bosch products and staff training. Bosch confirmed that in cases such as this improvement plans for staff are implemented, with a view to ensuring that code standards are adhered to across the group. The systems as a whole for existing member inspections/audits were found to be very robust.

Membership Withdrawal and Sanctions for Non Compliant Member Businesses

Several members who had withdrawn from the scheme were discussed. This is a fairly common situation, with some garages closing down. The procedures for withdrawal were examined and the websites for withdrawn members checked to ensure that they were no longer using the Code logo.

Observation:

One member was found to be still using the Bosch logo, even though they withdrew from the scheme in July 2015. This could lead consumers to conclude that they will be protected under the code at this garage and the Bosch Legal team is currently dealing with the case.

There is a very good system in place to deal with non-compliant member businesses. Where non-compliances are identified, a development plan is written. If no improvement is noted, or if the matter is more serious, a warning letter is issued. If resolution to the issue is not achieved within 28 days then the member is deemed to be in breach of their contract with Bosch and removed from the scheme.

Best Practice:

Bosch has recently introduced a “Bronze, Silver and Gold” assessment of all members. Those that are not committed to the scheme, or to the code are identified as “Bronze” and are placed on a 12-month improvement plan. Failure to improve standards will result in either forcible or voluntary removal of the member. 50 members have been removed under this process since last audit.

Terms and Conditions and other Pre-Contractual Information

By actively seeking a Trading Standards Primary Authority partner, Bosch is addressing the issue of standard terms and conditions for all members. Bosch continues to provide a range of point-of-sale materials for display in garages, including posters, copies of the code of practice and other helpful information for consumers.

Marketing and Advertising by Member Businesses

The Primary Authority Partnership will also be able to provide assurance that marketing and branding guidelines are legally compliant. Although Bosch provides all of this information and has final authority over signage etc., advertising is carried out on both a national and a local level. The Primary Authority will be able to approve all advertising materials to ensure that no legal challenges will be faced (if Bosch wishes).

There are no issues of concern with marketing and advertising.

Customer Service Provisions

Bosch has recently moved all of its customer service feedback provisions online. This is a huge step forward as it makes it easier to capture data and is a more user-friendly way for consumers to provide feedback. Bosch clearly values customer service excellence and has made a number of organisational and personnel changes recently to reflect this.

Consumer Complaints Process

The consumer complaints process was examined and no issues were identified. There are a number of changes that are being implemented into the process to accommodate the new ADR Regulations. These include the requirement for the consumer to first try and resolve the matter with the garage, and an extension of time limits for ADR cases from 6 months to 12 months. The alternative dispute resolution process was examined and found to be satisfactory. The National Conciliation Service (NCS) is a certified, independent, automotive ADR that offers dispute resolution services to the Bosch network and consumers.

Customer Satisfaction and Feedback

Bosch has an excellent system in place for the capture of customer satisfaction and feedback. Analysis of data over several months also shows excellent feedback

(92%+) across a range of different criteria and it is clear that Bosch customers enjoy very high levels of customer satisfaction. In addition, 104 mystery shopper visits were carried out across the network in 2015. This equates to 21% of all garages in the group.

Best Practice:

Bosch very effectively displays key customer service data on its website for consumers to view before deciding to use an approved garage. Bosch also investigates when less satisfactory scores have been reported, using training and development plans to ensure future compliance by staff and garages.

The feedback for individual garages can be found via their own garage landing page on the national Bosch Car Service website. When a consumer searches for a local Bosch Car Service, the garage details page contains any previous customer complaints. Each review is given a star rating making it easier for consumers to determine a positive review.

Conclusions

It is the opinion of the auditor that Robert Bosch Ltd is continuing to fulfil its obligations as a code sponsor. The member base is changing, with a renewed focus on retaining members who are compliant with the CCAS core criteria and the Bosch Car Service Consumer Code of Practice.

Bosch has demonstrated through a number of different initiatives that it is committed to improving the experience of its customers. This continues through improvements to the code and the systems supporting it. There is a culture of customer service excellence at Bosch, which compliments the enhanced consumer protection that the code provides.