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## Glass and Glazing Federation (GGF) Desk top Audit 10th July 2019

### Background information:

The Glass & Glazing Federation was founded on the 13 January 1977 by the change of name of the flat glass association (founded 1 March 1964) to the Glass and Glazing Federation and the incorporation of the insulating glass, safety glazing and glass benders association thus amalgamating the representative bodies of the major parts of the industry at that time.

Since its formation the Glass & Glazing Federation has greatly increased its work on behalf of the industry in technical and trading standards, in marketing and communications including representations to the Government and the media, in industrial relations and in training and health and safety much work is conducted at a European and International level. The range of interests covered today includes every aspect of the glass and window industries along with solar applications.

In the last decade the GGF has set up and acquired several companies to strengthen its position for members' benefit.

Since its formation the GGF has greatly increased its work and influence on behalf its members and of the industry generally in terms of technical and trading standards as well representing the industry to local, national and European Government and the trade, national and international media.

Today the GGF is the voice of the industry and has unrivalled authority with the long term support and commitment of a high value membership that includes practically all the key players in all sectors of the industry. On behalf of its members, the GGF lobbies local and national Government, influencing policies and legislation to ensure that its members are considered in all the wider issues that could affect their businesses.

The Federation also represents its members in industrial relations, technical forums, in training and in health and safety at local, national and international levels. The range of issues covered by the GGF is far and wide and includes almost every aspect of the glass and window industries along with solar applications. Many GGF Members constantly supply their technical knowledge to the GGF's Technical Department which significantly adds to the technical expertise and publications that have become a touchstone for the industry.

The GGF has achieved accreditation to the Chartered Trading Standards Institute Consumer Codes Approval Scheme. The code covers the activities of code members

with respect to all aspects of their business with consumers, either direct or through sales showrooms in respect of home improvement products including but not limited to glazing, replacement windows and doors conservatories, roofline, driveways flat roofing plus renewable energy products.

### **Audit Process**

A qualified chartered trading standards professional from the Chartered Trading Standards Institute (CTSI) completed a desktop audit. The audit focused on the following areas:

1. Member application process including checks carried out on prospective members
2. Member auditing-content and process (including general compliance with the code, staff training and dealing with consumer complaints)
3. Sanctions for non-compliant members
4. Marketing and advertising by member businesses- Terms and conditions and pre contractual information (including cancellation rights, deposits, delivery times and guarantees and warranties)
5. Customer service provisions (including support for vulnerable consumers).
6. Consumer complaints process (including ADR)
7. Customer satisfaction, information/complaints from enforcement agencies, and how this information is used to develop and improve the code

### **Audit Summary**

There have been no changes since the last the last audit.

### **Member Application Process**

There are currently 284 members of the GGF and as such signed up to the GGF Consumer Code of Practice. There have been 49 new members in the last year.

Companies must have been trading for more than three years to be accepted as a GGF member, this prevents 'phoenix' companies from becoming members. Financial approval for membership of the GGF includes a credit report and Companies House accounts which is checked and approved by the Membership Administrator to ensure a company is financially sound and fit and proper. The company also supplies a copy of its consumer contract terms and conditions which is vetted by the Membership Administrator. A 'model' set of terms and conditions is available to members. When all these essential requirements have been passed a site visit is carried out, which is based on a case by case basis as they do not inspect a marketing company's premises. For manufacturing companies site visits are carried by one of its Technical Officers and if not may be carried out by a Regional Secretary who completes a written audit. If approved, the company is entered into GGF membership, listed on the relevant GGF websites and sent a welcome pack.

There is also a promotion programme for potential new members who have not yet been trading for three years which gives them access to technical, health and safety

advice and 'trading standards' advice, there is a basic application procedure. They cannot use any of the logos during the first three years. After three years they can transition to a full member going through exactly the same process described above.

### **Existing Member Inspections/Audit**

There is comprehensive very well organised and controlled procedure for monitoring members. There is a questionnaire of 55 questions. Each year members are asked the same 9 high priority questions with the other lower priority questions completed over a 4-year period. Responses are scored and recorded.

For any item of non-compliance found at audit the Member will be given a period of 30 to 90 days as appropriate to rectify the non-compliance. The period for each non-compliance will be a reasonable period based on the nature of the non-compliance. If a non-compliance has not been rectified in the agreed period the Member will be given a final deadline of a further 30 days. If after this extended period the non-compliance has not been rectified then the member will be referred to the Code's Discipline and Sanctions Panel for appropriate action

Guidance has been given to members on correct completion of the questionnaire. Members are 'chased' to ensure they complete and return the forms, ultimately, they are told they will be removed from MyGlazing.com if they fail to complete and return on time. Site visits are carried out on approximately 10% of members each year based on a random targeted schedule using the questionnaires to suggest which members need to be visited.

Members who have not completed the year 1 questionnaire do not receive the GGF CTSI logos file for use on their marketing and sales materials until the questionnaire is satisfactorily completed.

There are records for training on vulnerable consumers, and canvassing and particular focus on being on customers' premises more than 4 hours, it was reported that no company recorded having a salesman on site for over 4 hours.

The results of all audits are scored and recorded on a database/spreadsheet enabling reports to be run.

There has only been one onsite audit so far this year, 46% of 'desktop' audits have been completed so far.

### **Membership Withdrawal and Sanctions for Non-Compliant Member Businesses**

Any breaches of the code are subject to a range of sanctions within the code. The Glazing Executive administer glazing issues and the Home Improvement Executive for other home improvements can decide on warnings, a requirement to change modify or establish an operating practice as a condition of continues membership, suspension or expulsion.

28 members have left the GGF in the last year. It was reported that no members were currently in the disciplinary process.

## **Marketing and Advertising by Member Businesses**

The code requires marketing material to be in plain English and in compliance with the guidelines issued by the GGF Marketing and Communications Department.

Desktop and website audits are used as part on the monitoring to ensure compliance with the guide and use of logos.

In addition, the GGF is very active in promotion of the code sending out approximately 100 press releases a year. Members are sent fortnightly and quarterly newsletters, Newswire and Glassi respectively to members summarizing industry and members news and marketing activities. The GGF has produced postcards to promote the Consumer Code of Practice and CTSI, which has been sent to all code members.

## **Terms and Conditions and other Pre-Contractual Information**

Members' terms and conditions are vetted as part of the initial application process to ensure they both comply with the code and comply with relevant 'consumer' legislation and there are no unfair restrictive terms. A model set of terms and conditions is available for members to use if they wish.

## **Customer Service Provisions**

There is a comprehensive website 'myglazing.com' which is a consumer facing website providing a wealth of information giving various technical guides, copies of codes and how to find a GGF member.

GGF has a stand-alone procedure for vulnerable consumers and all members have to provide training to their staff and maintain records (which are part of the audit process).

## **Consumer Complaints Process**

There is complaints' process in place which was satisfactory. All complaints go to the conciliation officer. Approximately 3000 complaints are received a year but this is reduced to approximately 300 when consumers are informed that the process is not about compensation. The focus on the process is about fulfilment of the contract. When the complaint is accepted there are strict time limits to be adhered to. If the complaint remains after 56 days then the consumer can opt for the binding ADR scheme operated by TGAS (The Glazing Arbitration Scheme). The complainant pays £100 and the member £395 again there are strict time limits.

<p><b>Non-compliance</b> It was reported that the ADR provision is not fully compliant due to the fees involved. CTSI has been informed and an agreement has been reached for extension. The application to become a full ADR provider is ongoing.</p>
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Complaint statistics are used to help produce updated consumer guides a recent example is revised and updated information to consumers on acoustic glazing.

2 complaints per £1,000,000 turnover is considered a trigger point for intervention.

### **Customer Satisfaction and Feedback**

Statistics are gathered from My Local Services but these are not providing sufficient numbers to draw any real conclusions for improvements. GGF is an active member of CTSI consumer reference group and is looking to have a facility to get feedback from consumers to help continuous improvement of the scheme. Customers can use myglazing.com to leave reviews, and are encouraged to do so by member companies. Reviews are monitored by GGF. An annual members survey is carried out by the GGF.

### **Conclusions**

With the exception of the outstanding changes to the ADR provision GGF is continuing to fulfil its obligations as a code sponsor and its members are compliant with the CCAS core criteria and the GGF Consumer Code of Practice. It is a comprehensive very well-run scheme with continuous improvement at its heart.