

Trust My Garage Consumer Code

27th November 2020

Background information

The Trust My Garage (TMG) Code of Practice is sponsored by the Independent Garages Association (IGA) and administered by Retail Motor Industry Standards & Certification (RMISC). First established in 1976 it has been revised over the years to reflect new legislation and the implementation of best practice identified from feedback from both Members and Customers.

On becoming Members the respective businesses make a commitment to the consumer regarding the provision of service, warranty and repair of Vehicles. It is noted that membership of the Code is open only to Independent Garage Association members.

Retail Motor Industry Standards and Certification (RMISC) was established by the RMIF as a subsidiary company to provide certification services and is a completely independent entity. Because of this independence RMISC has been appointed by IGA to administer the code.

Audit Process

A desk-top audit was carried out by a Trading Standards Practitioner from the Chartered Trading Standards Institute on 27th November 2020.

The audit focused on the following areas:-

- Member application process including checks carried out on prospective members.
- Member auditing-content and process (including general compliance with the code, staff training and dealing with consumer complaints).
- Sanctions for non-compliant members.
- Marketing and advertising by member businesses - terms & conditions and pre-contractual information (including cancellation rights, deposits, delivery times and guarantees and warranties).
- Customer service provisions (including support for vulnerable consumers).

- Consumer complaints process (including ADR)
- Customer satisfaction, information/complaints from enforcement agencies, and how this information is used to develop and improve the code.

Audit Summary

The audit examined:-

- The initial application process
- Re-audits
- The process for businesses who resign as a Member
- The monitoring processes

Member Application Process

TMG currently has 3020 members. There have been 94 applications since the last audit.

In the summer of 2019 TMG launched a TV advertising campaign, directed at consumers. The advert is available to view on the TMG website. The advert has caused an uplift in interest in TMG and an increase in applications. The advert is also used by the IGA to promote joining TMG to their members.

IGA Members can apply to join the TMG scheme, free of charge. Applicants are subjected to an on-site audit prior to being approved. Any issues raised during the audit are discussed with the garage owner/manager and noted on the audit form. The owner/manager and auditor then both sign off the audit form including any agreed recommendations.

Any applicant whose first audit receives a score of less than 85% will be advised of the areas for improvement and is revisited after 12 weeks. If the business scores less than 85% again, then another 12 week period is allowed to enable them to address the issues. If the improvements are not implemented and the score remains below 85% then the application is refused.

Existing Member Inspections/Audit

TMG's current monitoring commitment is to re-audit Members on a five year cycle. It is reported that in the previous 12 month period 94 audits of new members and 336 re-audits (this figure includes the re-auditing of new members) were carried out.

Re-audits are carried out by a different team because the Administrators believe it provides better oversight and moderation of the audit process. Issues identified during re-audit are discussed with both teams to ensure ongoing audit consistency.

With the membership increasing to over 3000 TMG is struggling to ensure that the five year cycle is achieved, approximately 600 premises should be audited each year.

TMG are proposing to increase the robustness of their member audits. However as this will take longer, the current audit takes up to three hours, there will be less audits each year. TMG's auditing team were due to meet in November 2019 to discuss this and send a proposal to CTSI. This did not happen.

Due to the pandemic TMG auditors were furloughed between March and July 2020. The auditors found that TMG members were nervous about letting auditors on-site, TMG gained agreement from CTSI to carry out remote audits in the short term.

Recommendation:

If TMG wish to adjust their monitoring regime to include remote audits on a permanent basis, this must be agreed with CCAS.

Membership Withdrawal and Sanctions for Non-Compliant Member Businesses

There a process for the removal of non-compliant members, but TMG has not had cause to use the procedure this year.

Since the last audit 140 members have left the scheme. When members leave the scheme they receive a letter to close their membership and this includes instructions on removing all references to TMG and CTSI. A month after their membership ceases the company's online presence is checked to ensure that any reference to TMG and CTSI has been removed. In addition, the TMG Field Team are made aware of all members that have left and will drop in if they are in the area to check that all references to TMG have been removed. TMG have never needed to escalate this issue once a site visit has taken place.

Details of three members who have left since the last audit were provided. The closure letters were found to be as detailed above and their websites no longer carried reference to TMG or CTSI.

Marketing and Advertising by Member Businesses

TMG continue to provide a comprehensive booklet outlining how to make best use of TMG membership including TMG and CTSI logo usage. There is also a members' area on the TMG website where suggestions for marketing material can be downloaded.

TMG maintain their review of members online presence. A monthly random sample of five members are chosen and their marketing of the Code is reviewed.

The five member's websites and/or Facebook/Twitter pages are checked for the following:-

- ADR Text and details;
- CTSI Logo;
- TMG logo;
- Any consumer facing advice.

Following the review, if it is felt that the member could benefit from some advice then an email is sent with the TMG Marketing Toolkit attached and includes links to the TMG website where the member can find tips on improving their online presence. The data acquired is then used to formulate policy and provide relevant advice to all members.

The latest spreadsheet was supplied for the audit. This carried on during the pandemic lockdown.

Terms and Conditions and other Pre-Contractual Information

Model terms and conditions are available on the Members Only section of the TMG website. Terms and conditions are assessed at audit and if deemed not suitable it is suggested that they use the model document.

Customer Service Provisions

No update provided here.

Consumer Complaints Process

All complaints under the code go directly to the National Conciliation Service.

Due to the coronavirus lockdown all the RMI offices were shut down so there were no staff in the RMISC or NCS admin teams. TMG were unable to get regular updates from the ADR team.

Observation:

Data should be obtained in relation all cases that were administered between the last audit Nov 2019 and the start of lockdown March 2020. Cases handled since the offices reopened should be assessed and recorded.

Customer Satisfaction and Feedback

TMG provide stickers to be attached to customer invoices encouraging customers to leave reviews on the TMG website. The online review form contains five yes/no questions and one multiple choice question. The aggregate of the answers creates a star rating for the garage on the TMG website. Since the last audit 1123 reviews have been left.

Best Practice

From the results of the online reviews it is reassuring to note overall satisfaction remains high at 86% and 95% of respondents said that they would use the garage again.

Conclusions

At the audit in 2019 TMG indicated that they were struggling to carry out all audits needed to satisfy their member monitoring requirements. The use of remote auditing was discussed. However this was only raised again some eight months later at the height of the coronavirus lockdown. TMG must ensure that their members are monitored for compliance.