

## Trust My Garage Consumer Code

27<sup>th</sup> November 2019

### 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

The on-site audit was carried out by a Trading Standards Practitioner from the Chartered Trading Standards Institute on 27<sup>th</sup> November 2019.

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

TMG currently has 3094 members. This is an increase of 109 members since the last audit. This represents 337 new TMG members, as 228 members have recently left the scheme.

## **Member Application Process**

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. 291 of applicants score over 85% at their first audit.

### **Best Practice**

The new TMG TV advert promotes the scheme and will hopefully increase the number of reviews of garages left of the TMG website. This in turn should positively affect the standards of customer service from TMG members.

## **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 337 audits of new members and 295 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 are meeting later this month where this will be discussed and a proposal will be submitted to CTSI.

### **Recommendation:**

If TMG wish to adjust their monitoring regime, this must be agreed with CCAS. Less time consuming online or telephone audits could be considered in addition to on-site audits.

## **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 137 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.

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

TMG have produced a Marketing Toolkit to help members to produce compliant advertising material. The toolkit covers Press and Social Media advertising, as well as the promotion of the Code.

Following recommendations in last year's audit TMG have introduced a review of members online presence, this is their own website and/or Facebook/Twitter. This is carried out by the TMG administrators' team. Each month five members are picked at random and their online presence is 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.

## **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**

Following recommendations at the last audit, TMG have started to develop guidance for members in relation to how to treat vulnerable consumers. They are using a Financial Conduct Authority guidance document as a template. TMG have covered this issue at members events and in their blog.

### **Best Practice**

Since the last audit TMG have built a good understanding of this issue and how it may affect their members.

## Consumer Complaints Process

Since removal of the 'Code Sponsor Stage' of complaint handling from the Code was approved by CCAS in 2018 all complaints under the code go directly to the National Conciliation Service.

The current NCS report shows 15 open complaints.

### **Recommendation:**

TMG currently receive a report on complaints every six months. It is recommended that this is increased to quarterly to ensure any emerging issues or concerns with members are picked up quickly.

## 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 1492 reviews have been left.

### **Best Practice**

From the results of the online reviews it is reassuring to note that of the consumers who completed the questionnaire there were 26% who had not used the TMG Member garage before and over 95% of them said that they would use the garage again.

## Conclusions

It is clear that the Code is designed to improve customer service and consumer protection in the independent garage sector.

Steps have been taken to address previous Audit recommendations.

TMG are currently reviewing the monitoring of members. This must not lessen the level of oversight that the members are subject to.