

# **Consumer codes approval scheme**

**Update of core criteria - consultation exercise 2005**

**November 2005**

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# 1 THE CONSULTATION PROCESS

## Responding to this consultation

- 1.1 We want to hear from all those who have an interest in consumer codes of practice, particularly current or potential code sponsors under the Consumer Codes Approval Scheme (CCAS), advisory bodies and enforcement agencies. We are also particularly keen to hear from those who have a specific interest in race equality issues.
- 1.2 A list of consultation questions is set out at Annexe C. We welcome your views and comments on these questions as well as any other issues relating to the CCAS core criteria.
- 1.3 When responding please state whether you are responding as an individual or representing the views of an organisation. If responding on behalf of a larger organisation please make it clear who the organisation represents, and where applicable, how the views of members were assembled.
- 1.4 A list of those organisations consulted appears at Annexe E. If you have suggestions of others who may wish to be involved please contact us.

## The consultation period

- 1.5 The consultation period began on 30 November 2005 and will run until 17 February 2006. Please ensure that your response reaches us by that date. If you would like further copies of this consultation document it can be found at [www.offt.gov.uk](http://www.offt.gov.uk)

Please send consultation responses to:

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## **Next steps**

- 1.6 We will collate responses and publish a formal response to the consultation exercise during May 2006 on [www.oft.gov.uk](http://www.oft.gov.uk)
- 1.7 The information you send us may need to be passed to colleagues within the OFT and/or published in a summary of responses received in response to this consultation. We will assume that you are content for us to do this, and that if you are replying by email, your consent overrides any confidentiality disclaimer that is generated by your organisation's IT system, unless you specifically include a request to the contrary in the main text of your submission to us.
- 1.8 Please ensure that if you want your name or response to be kept confidential, you state this clearly in your response (Confidential responses will be included in any statistical summary of numbers of comments received and views expressed).

## **2 WHAT THIS REVIEW IS ABOUT**

### **Why do a review now?**

- 2.1 We have recently approved our first codes and have experience of how the assessment process works in practice. We know that some of the criteria are difficult for code sponsors to meet, some could be organised better and some need considering to make sure they are as clear as possible. This review is considering the format and layout of the criteria. We are not seeking to change or impose additional requirements but to clarify what currently exists. We believe it is also an appropriate opportunity to consider the requirements of the Race Relations Act 2003 as part of this review.
- 2.2 A full review of the CCAS would assess the effectiveness of the core criteria in reducing consumer detriment in the sectors where an OFT Approved code exists. We would need to assess several codes over a number of sectors over a period of time. This type of review will be undertaken at a later stage when we have the necessary evidence of effect.

### **Background**

- 2.3 The aim of the OFT's Consumer Codes Approval Scheme (CCAS) is to promote and safeguard consumers' interests by helping consumers identify businesses which offer them higher standards of customer service and encourage other traders to raise their standards.
- 2.4 The scheme gives OFT approval to those consumer codes which meet the core criteria as set out in Annexe A. Code sponsors and members of codes which achieve OFT approval qualify to be licensed to use and display the OFT Approved code logo.

- 2.5 The Consumer Codes Approval Scheme consists of two co-dependent stages. Code sponsors complete stage one by making a promise that their code meets the core criteria in principle. They can then move on to stage two where they have to demonstrate, with evidence, that their code delivers on that initial promise. OFT endorsement and promotion to the consumer begins once the burden of proof has been met by the code sponsor.
- 2.6 The CCAS core criteria were prepared for the consultation exercise '*The OFT's new approach to consumer codes of practice*' issued in February 2001 and formally agreed in the '*Consumer codes of practice: the OFT's response to the consultation*' in July 2001. For more information on the CCAS please visit [www.of.gov.uk/codes](http://www.of.gov.uk/codes)
- 2.7 Since then we have assessed 24 code applications, with five gaining OFT approval.<sup>1</sup> We have also revised the guidance for code sponsors twice (latest version published in March 2004), completed a major revision of the format of the application form and made functional changes to the layout of the core criteria. It now seems appropriate to undertake a review of the core criteria as we have operational experience to guide us.

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<sup>1</sup> SMMT Ltd – Society of Motor Manufacturers and Traders Limited, VBRA Ltd – Vehicle Builders and Repairers Association Limited, DSA – Direct Selling Association, OEA – Ombudsman for Estate Agents Company Ltd, ABTA – Association of British Travel Agents.

## Methodology

2.8 Much of this review is concerned with functionality and issues such as structure and layout. We began the review process with consideration, within the OFT's codes team, of issues arising from the first few code approvals. This paper builds on that consideration and invites comments on proposed changes from our key stakeholders for the CCAS.

## Issues

2.9 The initial review undertaken by the codes team considered the following issues to be appropriate for external consultation:

1. Are the criteria too difficult?
  - whether the core criteria are truly 'challenging but achievable', or have any criteria been identified which code sponsors have found particularly difficult or impossible to meet? Are there any that are deterring code sponsors from applying?
2. Prepayment protection
  - how to overcome the difficulty of the protection of deposits/prepayments criterion (3j) and provide advice to code sponsors/members. Are there mechanisms for protecting prepayments which would be more acceptable?
3. Proposed amendments to structure and wording
  - the wording and layout of the core criteria. Are they sufficiently clear? Are the proposals to amalgamate certain criteria appropriate?
4. Proposed new criterion
  - the inclusion of a new criterion on the requirements for monitoring use of the Approved code logo by code sponsors.

## 5. Race equality

- OFT's Race Equality Scheme 2003 requirements.

### **Effect of proposed changes**

- 2.10 Following this consultation exercise we will publish the findings and if appropriate, the revised criteria and guidance. Code sponsors who have applied for approval for their code under the CCAS will be allowed an appropriate period of time if required to amend their codes and/or documents/procedures to comply with any revised criteria.

### **Changes**

- 2.11 Throughout this document, proposed alterations or additions to wording are indicated by being underlined.

### 3 ARE THE CRITERIA TOO DIFFICULT?

#### Introduction

- 3.1 We have described the core criteria as 'challenging but achievable', but there has always been recognition that some criteria are likely to cause sponsors more difficulties than others, based on the requirements or on the sector itself.

#### Experience to date

- 3.2 Assessment of codes by the OFT to date has highlighted the following as criteria which have proved difficult for code sponsors during the application process:

##### **Criterion 1c**

- 3.3 **Code sponsors shall have independent disciplinary procedures available to deal effectively with cases of non-compliance by members.**
- 3.4 Some code sponsors have confused the requirement for independent disciplinary procedures with the need for an independent redress scheme. For example, one code sponsor incorporated their independent redress scheme into their disciplinary procedures. Another found it difficult to grasp the separation between complaints handling and disciplinary procedures.
- 3.5 Finding suitably independent people for the disciplinary procedures has also been mentioned as a potential problem by some of the local authority trader schemes. In most cases the disciplining of members is undertaken by the TSD itself. As many of these schemes are multi-sector it can be difficult to find representatives who have no past or present association with the sector.

- 3.6 Questions have also been raised about the definition of 'independence', for example, one sponsor queried whether an individual who had worked in the sector five years ago would be considered as meeting the requirement for independence from the sector.

### **Criterion 3a**

- 3.7 **The code shall include measures directed at the removal or easing of consumer concerns and undesirable trade practices arising within the particular sector.**
- 3.8 Some code sponsors have been reluctant to state what problems there are within the sectors as they believe by doing so they give a negative impression to consumers of how businesses are operating. This however is fundamental to the aim of the CCAS which helps consumers identify traders who are committed to addressing identified concerns and practices.
- 3.9 Multi-sector local trader schemes have also expressed concerns regarding this criterion. These codes may cover a large number of sectors, and they would find it very difficult to include in the code all of the measures aimed at removing or easing consumer concerns/undesirable trading practices within each of the sectors covered. Using separate annexes attached to a generic code would also prove unwieldy for codes which cover a large number of sectors.

### **Criterion 3j**

- 3.10 **The code shall address protection of deposit or prepayments as appropriate to the sector.**
- 3.11 This criterion has caused the most difficulty by far for a number of code sponsors.

- 3.12 Many of the concerns raised by code sponsors have related to the cost and the difficulty of setting up and operating specific systems, particularly as many say that the number of prepayments taken are comparatively low. Others have stated that for some of their member companies prepayments provide a means of necessary cash flow for the business to enable it to meet demands for goods made to order. Some sponsors also believe that as few members have gone out of business due to insolvency this is an indicator of future financial stability and therefore the chance of prepayments/deposits not being refunded if necessary is very small.
- 3.13 Local trader schemes have also raised this as a concern because of the number of different sectors covered and the number of potential solutions required.

#### **Criterion 4a**

- 3.14 **The code shall include a requirement that code members shall have in place speedy, responsive, accessible and user friendly procedures for dealing with consumer complaints. A specific reasonable time limit for responding to complaints shall be prescribed.**
- 3.15 Some code sponsors have been reluctant to set down timescales for complaints handling by members on the grounds that they are likely to work to them rather than dealing with complaints straight away. Others have said a time limit is not reasonable as every case is different and much more time may be needed in some cases. Our aim here is to ensure that the complaints handling procedures should have specified timescales for action so that consumers can be assured that their complaints will be dealt with as quickly and effectively as possible.

#### **Criterion 4d**

- 3.16 **The code shall include the availability of a low-cost, speedy, responsive, accessible and user-friendly independent redress scheme to act as an alternative to seeking court action in the first instance.**

- 3.17 See also comments above for Criterion 1c, paragraph 3.3
- 3.18 The cost of providing independent redress has been raised by code sponsors as has the difficulty of interpreting what we require as meeting the need for 'independence'.
- 3.19 Local trader schemes also cite this as a potential problem issue as they have previously dealt with all complaints themselves and may find it difficult to find sufficient independent representatives who cover the variety of sectors they deal with.

### **Criteria 5b and 5c**

- 3.20 **The code sponsor shall implement and publish the results of the performance indicators to demonstrate the effectiveness of the code.**
- 3.21 **The code sponsor shall publish a report annually on the operation of the code including in particular the numbers and type of complaints referred for conciliation and to the independent redress system. It would be preferable if the report were compiled by an independent person or body with powers to recommend actions.**
- 3.22 Some code sponsors have been confused about the extent of the word 'publish' in both criteria and thought this referred to the 'glossy' report they are used to publishing annually. This has caused difficulties because code sponsors were not always willing to give us all the information we need to assess whether the code is working as they did not want this information in the public domain.
- 3.23 We have responded by explaining that:
- 5b relates to the publication of the results of their monitoring procedures and satisfaction surveys so that external parties are aware of what has happened, and

- 5c is the comprehensive report that gives information about the monitoring, satisfaction survey and functioning of all procedures (complaints handling, redress, code review etc). We want this report sent to us firstly during stage two so that we can assess whether the code is working, and after approval, on an annual basis. This report is not made public.

3.24 Other potential problem criteria for code sponsors:

### **Criterion 1(b)**

3.25 **Compliance with the code shall be mandatory on code members. Code sponsors shall be able to demonstrate that members are prepared to observe its provisions.**

3.26 Although this has not been specifically referred to as difficult, it's clear from the findings from the evidence gathering process during stage two that for some code sponsors compliance with the code is not regarded as mandatory for all of their members, despite any written statements made at their application for membership or at renewal. Compliance data from the monitoring exercises suggests that in some cases code sponsors are not willing/able to impose this criterion in practice. In those circumstances OFT approval will not be achieved.

### **Criterion 5a**

3.27 **The code sponsor shall develop performance indicators, for example, mystery shopping exercises and independent compliance audits, to measure the effectiveness of the code.**

3.28 Some code sponsors of existing codes do not have proactive monitoring procedures in place and are deterred by the expense of operating mystery shopping exercises and independent audits. Some try to use their complaint handling procedures to meet this requirement.

3.29 There have also been a number of queries regarding the levels and frequency of monitoring required to meet this criterion, together with discussions on what would be acceptable 'success' rates. As the number of applications has increased we have been able to be more specific about requirements and publicise them. Statisticians within the OFT have also provided extensive advice on each application individually.

## Summary

3.30 Despite the initial fears voiced during the 2001 consultation, and apart from Criterion 3j (protection of deposits and prepayments) the majority of the criteria in practice appear to be achievable. Those which have been identified as causing difficulties seem to be as a result of a lack of understanding of what is required, and how they can be met rather than because the criteria themselves are unachievable. Improved guidance and examples of how other applicants are able to meet the criteria should help provide sponsors with suggestions for how they can be met within their sectors.

## Recommendation 1

3.31 We should amend the existing wording of criteria 5b and 5c:

- 5b - The code sponsor shall implement and publish the results of the performance indicators to demonstrate the effectiveness of the code.
- 5c - The code sponsor shall publish a report annually on the operation of the code including in particular the numbers and types of complaints referred for conciliation and to the independent redress system. It would be preferable if the report were compiled by an independent person or body with power to recommend actions.

### Amended wording

- 3.32 5b - The code sponsor shall implement the performance indicators and make available to all interested parties the results of their monitoring procedures and satisfaction surveys to demonstrate the effectiveness of the code.
- 3.33 5c - The code sponsor shall provide a written report annually to the OFT on the operation of the code to include changes to the code implemented or considered, the numbers and types of complaints including information on outcomes from the conciliation process and the independent redress scheme. The results from monitoring, satisfaction surveys and the disciplinary process should also be included. It would be preferable if the report were compiled by an independent person or body with powers to recommend actions.

Question 1. Are there any criteria other than 3j which you believe are difficult for code sponsors to meet? If so why?

Question 2. Do you agree with the proposed amendments to criteria 5b and 5c? Is it clear what information is required and when?

## **4 CRITERION 3J – PREPAYMENT PROTECTION**

- 4.1 **The code shall address protection of deposit or prepayments as appropriate to the sector.**
- 4.2 Criterion 3j however is another matter and is demonstrably causing serious difficulties for some code sponsors. Despite providing advice and examples of how code sponsors can meet this criterion, there appears to be a reluctance to consider implementing any of the solutions. The most common suggestion from code sponsors about how this obstacle can be overcome is that we should grant an exemption even though many of their members may regularly take deposits and prepayments without any protection mechanisms in place.

### **Current situation**

- 4.3 From our discussions with code sponsors it is clear that prepayments are still being taken routinely in a number of sectors, and there are no protection mechanisms in place.
- 4.4 The OFT has undertaken a considerable amount of previous research on the issue of prepayment protection during 1984 to 1992 which included publishing two papers, and a report. The conclusions were that although there appeared to be a case for increased protection a complete ban on the taking of prepayments was not justified. The preferred approach was to encourage the development of voluntary schemes designed to protect prepayments covering particular problem areas.
- 4.5 Whether the percentage of consumers being affected by a failure to receive goods/services has altered since the surveys in 1984 and 1992 could only be assessed by undertaking a similar survey now. Whatever the outcome of such a survey it is clear that consumers are still required in some sectors to make deposits and prepayments and therefore risk losing money if the goods/services are not supplied.

## Recommendation 2

4.6 We acknowledge that this criterion may be difficult for some code sponsors to meet, but there remains the ongoing risk of consumers losing money by unprotected prepayments in a number of sectors. As, at first consideration, the situation appears to have changed little over the 20 years since the OFT first considered this issue we believe the requirement for code sponsors to meet this criterion still remains. However we are keen to obtain the views of advisory bodies, code sponsors and other interested parties on this issue to obtain a wider perspective of its relevance and importance now. Consideration will also be given to repeating the OFT consumer surveys of 1984 and 1992 to provide as up to date a picture as possible of the prevalence and effect of prepayments.

Question 3. Do you believe that the protection of prepayments and deposits should remain as a criterion within the CCAS despite the difficulties some code sponsors have in meeting it? If so why? Should criterion 3j be amended? If so how?

Question 4. Can you provide suggestions for how code sponsors could meet this criterion within sectors where prepayments/deposits are routinely taken?

## 5 PROPOSED AMENDMENTS TO STRUCTURE

5.1 There are two sets of criteria in particular which have caused some confusion about their meaning and function within the core criteria. The first set is :

- **1b – Compliance with the code shall be mandatory on code members, and**
- **2a – Code sponsors shall be able to demonstrate that members are prepared to observe its provisions.**

5.2 Although these two criteria have a different slant on the obligations required, that is, for 1b the onus is on the code sponsor to make compliance obligatory on those signing up to the code and for 2a the requirement is that members are prepared to do this, there is a degree of overlap which could be addressed by amalgamating the two criteria into one so that the overall aim (compliance with the code by members) is clearer.

### Recommendation 3

5.3 Criteria 1b and 2a should be amalgamated to read: 'Codes shall include a provision that compliance with the code is mandatory. Code sponsors must be able to demonstrate that members are prepared to observe the code's provisions'

5.4 The second set that needs further consideration is:

- **1c – Code sponsors shall have independent disciplinary procedures available to deal effectively with cases of non-compliance.**
- **6a - The code sponsor shall establish a procedure for handling non-compliance by members with the code. The procedure shall include reasonable time limits.**

5.5 At present, 1c is located within the first section of the criteria, Organisation, with 6a located within Enforcement. This has caused problems for some code sponsors who have had difficulty making the connection between the two and understanding that one cannot operate without the other, that is, you need to have procedures for finding out about non-compliance in place (6a) before you can instigate disciplinary procedures (1c). It would make sense to combine the two criteria as both procedures link into each other.

#### **Recommendation 4**

5.6 To move criterion 1c from its existing location in Organisation and combine with the existing criterion 6a. The new criterion (6a) would read: 'Code sponsors shall establish a procedure for handling non-compliance by members with the code. The procedure shall include independent disciplinary procedures and reasonable time limits.'

Question 5. Do the proposed amalgamations of criterion 1b and 2a and 1c and 6a help clarify what is required?
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## **6 PROPOSED AMENDMENTS TO WORDING**

6.1 There are a number of proposed amendments to the wording within individual criteria as follows:

### **Criterion 1d – Code sponsors shall have adequate resources and be funded in such a way that the objectives of the code are not compromised**

6.2 The aim of this criterion is to ensure that code sponsors have sufficient funds to operate the code and to undertake the required monitoring for approval under the CCAS. The revised wording places more emphasis on this aspect.

### **Recommendation 5**

6.3 In order to clarify the existing requirement under this criterion the wording should be amended to read 'Code sponsors shall have adequate resources and funding to ensure the objectives of the code are not compromised.'

### **Criterion 3k - The code shall address after-sales service provisions as appropriate to the sector**

6.4 This criterion goes beyond after-sales service and is defined within the guidance as relating to customer enquiries

- before a contract has been agreed
- after ordering
- after paying
- after receiving goods/services.

## **Recommendation 6**

- 6.5 In order to reflect more accurately the existing wider definition of the term 'after-sales' the wording of criterion 3k should be amended to read 'The code shall address customer service provisions as appropriate to the sector.'

### **Criterion 4b - The code shall include a requirement that code members shall offer maximum co-operation with local consumer advisers or any other intermediary consulted by a consumer when making a complaint**

- 6.6 This criterion refers not only to those intermediaries who have been consulted by a consumer, but who are also acting on their behalf during a dispute.

## **Recommendation 7**

- 6.7 In order to clarify the existing requirement under this criterion, the wording should be amended to read: 'The code shall include a requirement that code members shall offer maximum co-operation with local consumer advisers or any other intermediary consulted by and/or acting on behalf of a consumer when making a complaint.'

**Criterion 4d - The code shall include the availability of a low-cost, speedy, responsive, accessible and user-friendly independent redress scheme to act as an alternative to seeking court action in the first instance. The scheme shall be binding in respect of code members who shall not be able to refuse to allow a complaint to go before the scheme if a customer so chooses. The code member shall be bound to accept a judgement made under the scheme. Any such scheme shall be able to take account possible breaches of the code where relevant to the complaint**

6.8 The term 'judgement' is only appropriate for court decisions.

### **Recommendation 8**

6.9 To amend the wording in the criterion to read: 'The code member shall be bound to accept a decision made under the scheme.'

**Criterion 6a - The code sponsor shall establish a procedure for handling non-compliance by members with the code. The procedure shall include reasonable time limits**

6.10 The procedure for handling non-compliance by members with the code should include reasonable timescales for action throughout the whole process, not just one element therefore the use of the wording 'time limits' is not as clear as it could be.

### **Recommendation 9**

6.11 To amend the wording to read: 'The procedure shall include reasonable timescales for action.'

## **Criterion 7d - Copies of any code related publicity material generated by the code sponsor shall be provided to the OFT**

6.12 The aim of this criterion is to ensure we see copies of proposed code related publicity material produced by code sponsors before it is published.

### **Recommendation 10**

6.13 In order to clarify the existing requirement under this criterion the wording should be amended to read: 'Copies of any code related publicity generated by the code sponsor shall be provided to the OFT in advance of publication.'

## **Criterion 7e – Approved code logo**

6.14 When the core criteria were initially prepared and agreed the plans for a logo were not yet finalised. Since then we have developed an OFT Approved code logo and copyright licensing procedures to allow its use by code sponsors and members of OFT Approved codes. The wording of criterion 7e and its guidance therefore now needs to be updated to reflect the obligations required under the CCAS.

6.15 The current criterion and guidance is as follows:

Criterion 7e - Code sponsors and members shall publicise the fact that the OFT has approved the code by using the agreed OFT logo.

6.16 The supporting guidance states that:

'The aim of the criterion is to increase the effectiveness of the CCAS by building awareness of the scheme.

We want consumers to be able to easily identify businesses that have made a commitment to operate higher levels of customer service under an OFT approved code. The OFT will provide further information

concerning the protection and permitted use of the CCAS logo by code sponsors and members in due course.'

### Typical evidence

- 6.17 A statement that you are willing to publicise the OFT's approval of its code of practice by using the CCAS logo in the prescribed manner.
- 6.18 Relevant requirements in your code of practice that members will have to comply with the terms of the licence that will govern the use of the logo.

### Recommendation 11

- 6.19 To update the criterion as follows:

Code sponsors and members shall publicise the fact that the OFT has approved the code by using the CCAS logo in the prescribed manner.

- 6.20 To update the guidance for Criterion 7e as follows:

### Our aim

- 6.21 To increase the effectiveness of the CCAS by building awareness of the scheme.

### More information

- 6.22 We want consumers to be able to easily identify businesses that have made a commitment to operate higher levels of customer service under an OFT approved code.

## New text

- 6.23 Following OFT approval code sponsors and all members will be required to sign a copyright licence setting out the terms and conditions of use before being allowed to use the CCAS logo.

## Typical evidence you could provide

- 6.24 A statement that you and all your members are willing to publicise the OFT's approval of your code of practice by using the CCAS logo in accordance with the terms of the copyright licence.
- 6.25 Relevant requirement in your code of practice that members will have to comply with the terms of the copyright licence that governs the use of the logo.

Question 6. Do you agree with the proposed amendments to the wording of the specific criteria as set out above?

Question 7. Are there other criteria which could be amended in order to improve clarity? If so please provide your reasoning and suggested amendments.

## **7 PROPOSED NEW CRITERION**

- 7.1 Although criterion 7e sets out the obligation to display the logo, it does not specify the obligations on the code sponsor relating to its responsibility to monitor its members' usage of the logo and take action as appropriate, as required under the copyright licence.

### **Recommendation 12**

- 7.2 In view of the high level of importance of this requirement upon code sponsors and the CCAS as a whole, and that potentially it could be a factor relevant to withdrawal of a code's approval, we should add a new criterion to address these requirements. Suggested wording for the new criterion is as follows:

#### **Criterion 7f**

- 7.3 Code sponsors shall comply with the terms of the standard copyright licence and shall monitor and supervise their members' usage of the CCAS logo in compliance with the terms of the standard copyright licence and take appropriate action where there is suspected non-compliance.

- 7.4 Suggested guidance for the new criterion is as follows:

#### **Our aim**

- 7.5 To ensure that the CCAS logo is only used in accordance with the copyright licence as amended from time to time signed by code sponsors and their members.

## More information

- 7.6 Once a code is approved, code sponsors and all members will be required to sign a copyright licence in standard terms setting out the terms and conditions of use in order to obtain permission to use the CCAS logo. Non-adherence to these terms may result in OFT terminating the right of the member to use the logo and possibly also withdrawal of approval of the code.
- 7.7 We want consumers to have confidence that the logo is being used correctly by businesses and that misuse will be dealt with appropriately. Code sponsors are required to:
- notify the OFT on approval of a list of their members in the prescribed format
  - ensure that each member signs the copyright licence in the prescribed period following which the code sponsor must return the signed licence to the OFT
  - inform the OFT of any changes to its membership in the prescribed format within five working days of the change
  - provide a full list of members to the OFT on a monthly basis
  - conduct regular checks to ensure their members adhere to the terms of the copyright licence, and take action as appropriate
  - notify the OFT if the OFT's contractual right to suspend or terminate under the licence is triggered.

## Typical evidence

- 7.8 A statement that you are willing to monitor and supervise your members usage of the CCAS logo in accordance with the terms of the signed copyright licence.

## Checklist

- 7.9 State whether you are willing to monitor and supervise your members' usage of the CCAS logo and take appropriate action.

Question 8. Do you agree with the proposed wording for the new criterion 7f?

## 8 OFT'S RACE EQUALITY SCHEME 2003

### Background

#### Requirements under the Race Relations (Amendment) Act 2000

- 8.1 The Race Relations (Amendment) Act 2000 gives public authorities a statutory duty to promote race equality. The aim is to help public authorities provide fair and accessible services, and to improve equal opportunities in employment. In practice this means that listed public authorities must take account of racial equality in the day to day work of policy-making, service delivery and other functions.
- 8.2 Orders issued under the Act place specific duties on many public authorities to prepare and publish a Race Equality Scheme which should explain how they will meet both their general and specific duties. The OFT's Race Equality Scheme 2003 was published in September 2003, followed by an update in May 2004. One of the actions identified within the Consumer Regulation Enforcement Division (CRED) action plan relates to considering the guidance within the CCAS. To meet this action a Race equality impact assessment of the CCAS core criteria has been undertaken as part of this review. It follows the methodology laid out in the *Commission for Racial Equality's Impact Assessment Framework 2003-2004*. This can be found at [www.cre.gov.uk/duty/reia/index.htm](http://www.cre.gov.uk/duty/reia/index.htm)

### Race equality impact assessment

- 8.3 An impact assessment as applied to the core criteria for the purposes of this review is a little different to the standard assessment model for a policy under the Commission for Racial Equality (CRE) guidance as we have focussed on the criteria and guidance – the wider policy and processes of the CCAS are due for a full review later. The assessment would also normally take place at the time a new policy is being prepared – this is also not possible in the case of the CCAS as the scheme has now been operational since July 2001.

- 8.4 The impact assessment is a two stage process consisting of an initial screening to see if the policy is relevant to the race equality duty. If it is, a full and comprehensive assessment must then be undertaken to make sure it does not have adverse effects on people from different racial groups. Changes to the proposals should be made, or supplementary measures considered, if this turns out to be the case.

### **Findings from the initial screening exercise**

- 8.5 The screening process picked up 11 criteria that could be considered to be relevant and are subject to a full assessment.

### **Full assessment**

- 8.6 For the full assessment each of the core criteria that the screening indicated may deserve further examination has been considered in turn below. Issues arising from the screening together with the likely impact that this might have are considered. The criteria that have produced the same effect/have a similar impact have been grouped together for the purpose of carrying out the full assessment.
- 8.7 Further reviews of the core criteria and the CCAS as a whole will include updates on our progress. Monitoring arrangements will be agreed following this consultation exercise.

### **Race equality impact assessment – full assessment**

#### **Criterion 1d**

- 8.8 **Code sponsors shall have adequate resources and be funded in such a way that the objectives of the code are not compromised.**

## Findings

- 8.9 It is important to consider and encourage non-traditional code sponsors to apply under the CCAS because they contain businesses that might not be able to, or might not want to join a traditional sponsor such as a trade association - these businesses may otherwise not be able to take part in the CCAS.
- 8.10 The present guidance for how a code sponsor could meet the 'significant impact on a sector' criterion (1a), could include an example of a code sponsor who raised standards in a sector with a significant community group or ethnic minority presence.
- 8.11 A number of actions are also taking place to address this issue in the wider policy considerations of the codes team:
- seminars and initiatives on finding workable solutions to the barriers faced by local trader schemes
  - identifying representative bodies of minorities and communities
  - policy proposals being prepared by the codes team on how to increase the participation of small code sponsors. This could include a specific objective to consider the barriers faced by different groups.

## Recommendation 13

- 8.12 The guidance for criterion 1a should be amended under Typical Evidence to include examples of an organisation's previous involvement in raising standards in a sector with significant community group or ethnic minority presence.

## Criteria 2b and 2c

- 8.13 **Code sponsors shall be able to demonstrate that organisations representing consumers, enforcement bodies and advisory services have been adequately consulted throughout the preparation of the code.**

- 8.14 **Code sponsors shall be able to demonstrate that organisations representing consumers, enforcement bodies and advisory services are being adequately consulted throughout the operation and monitoring of the code.**

### Findings

- 8.15 Presently the core criteria guidance does not encourage code sponsors to specifically include representatives of ethnic minorities and community groups in the consultation process. However it goes some way to indicate the need to be inclusive when consulting by saying that: 'For some sectors we may need to consult more widely, such as if a code sponsor is selling products to the elderly or disabled, consultation with the relevant charities might be appropriate.' As an example, groups representing elderly and disabled consumers were consulted for a recent application by a trade association in the assistive products sector.
- 8.16 The guidance should specify that consultation with these groups should take place. We should ask the code sponsor to suggest representatives of the groups concerned during the consultative process.

### **Recommendation 14**

- 8.17 It is important that representative groups are consulted if there is consumer detriment concerning particular communities or ethnic groups in the sector. The guidance for criteria 2b and 2c should be amended under Typical Evidence to include confirmation from code sponsors that they have considered, and where appropriate taken action, to include representatives of ethnic minority and community groups during the consultation process with advisory bodies.

### **Criterion 3a**

- 8.18 **The code shall include measures directed at the removal or easing of consumer concerns and undesirable trade practices arising within the particular sector.**

#### **Findings**

- 8.19 There are sectors where particular groups of people are targeted with undesirable trade practices, for example, selling techniques targeting people with poor English skills through door to door high pressure selling.
- 8.20 This criterion is broad and relies on information coming from the OFT and advisory bodies regarding the nature of the practices in each sector. The core criteria guidance does not focus on any particular method and therefore can address any particular practice in an area. However, indirect or direct discrimination could be a potential differential effect affecting potentially all sectors and consumers. Consumers may be discriminated against because of staff attitudes or behaviour or the trader's procedures and therefore could be regarded as vulnerable under the definition of criterion 3l. Evidence of discrimination may be obtained from information included as part of the performance monitoring undertaken by the code sponsor. The guidance should therefore include a requirement for race equality issues to be specifically addressed within the code.

### **Recommendation 15**

- 8.21 The guidance for criterion 3a should be amended under Typical Evidence to include confirmation from code sponsors that their codes include measures to address problems affecting ethnic minorities and other communities if there is identified detriment to these groups in the sector covered by the code.

### **Criteria 3d, 3f, 3h, 3i and 3l**

- 8.22 **The code shall address clear and accessible pre-contractual information as appropriate to the sector.**
- 8.23 **The code shall address clear terms and conditions of supply and fair contracts as appropriate to the sector.**
- 8.24 **The code shall address cancellation rights as appropriate to the sector.**
- 8.25 **The code shall address guarantees and warranties as appropriate to the sector.**
- 8.26 **The code shall address the additional effort/help to be provided to vulnerable consumers as appropriate to the sector.**

### **Findings**

- 8.27 These five elements of the core criteria deal with areas where language may provide a specific barrier for consumers whose first language is not English.
- 8.28 There are geographical areas and possibly sectoral areas where there is a significant population for whom documentation in their first language may not be available. Market studies and evidence of consumer detriment in cases, complaints and feedback from representative bodies should give good indications of where these conditions occur.
- 8.29 There is a differential effect in action here if a significant proportion of consumers are suffering detriment because they cannot read some of the accompanying literature in their first language. Clearly it is desirable that this would be addressed during the process of drawing up a code of practice and that the OFT would consider when assessing an application. There is a case for adding the option of producing the information in another format (including Braille and audio) in the checklist of Typical

Evidence that could be provided. However the detriment in these cases is likely to be quite specific and targeted and should take account of the recommendations arising from the consultation during stage one where advisory groups have indicated there is consumer detriment affecting one or more groups in a sector.

### **Recommendation 16**

- 8.30 The guidance for criteria 3d, 3f, 3h, 3i and 3l should be amended under Typical Evidence to include confirmation from code sponsors that there is a requirement within their code that copies of literature will be made available to individual consumers on request in alternative formats as appropriate (other languages, Braille and audio) where advisory bodies have indicated there is consumer detriment affecting one or more groups within a sector.

### **Recommendation 17**

- 8.31 The guidance for criterion 3l should be amended under More information to broaden the scope of the definition of vulnerable consumers to also include 'where English is not the first language and English is the only language in which material is available'

### **Recommendation 18**

- 8.32 The guidance for criterion 3l should be amended under Typical Evidence to include confirmation from code sponsors that race equality issues have been considered and included as appropriate within the code.

## Criteria 5c and 7a

- 8.33 **The code sponsor shall publish a report annually on the operation of the code including in particular the numbers and type of complaints referred for conciliation and to the independent redress system. It would be preferable if the report were compiled by an independent person or body with powers to recommend actions. (The wording of this criterion may change if recommendation 1 is accepted. In that case, the recommendation below will no longer be applicable to this criterion).**
- 8.34 **Code sponsors and members shall ensure that their customers are aware of the code.**

## Findings

- 8.35 These two criteria are linked as they refer to publications made by a code sponsor in order to ensure that the code is accessible to consumers and also to ensure the accountability of the code. As with the previous criteria there are known geographical areas where there are many people for whom English is not their first language and many community groups who are affected (Welsh language communities, ethnic language communities) or groups requiring alternative formats of literature, for example, people with impaired sight, elderly people.
- 8.36 There is a differential effect in action here if a significant proportion of consumers are excluded because they cannot read the accompanying literature in their first language. If significant proportions of consumers cannot access the literature then there is a case for making it clear in the guidance that this would be expected to be considered in the code of practice. Again it may be more appropriate to ensure that this was a topic covered in the consultation carried out by code sponsors where this is a concern.

## **Recommendation 19**

- 8.37 The guidance to criteria 5c and 7a should be amended to include a requirement under Typical evidence that code sponsors and members will ensure that copies of the annual report/publicity literature will be made available to individual consumers on request in alternative formats as appropriate (other languages, Braille and audio) where advisory bodies have indicated there is consumer detriment affecting one or more groups within a sector.

Question 8. Do you agree with recommendations 13 to 19 arising from the Race Equality Impact assessment? If not, please give your reasons and suggestions.

# ANNEXES

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## A CURRENT CCAS CORE CRITERIA

### Organisation

#### Criterion 1a

- A.1 Code sponsors should have a significant influence on the sector.

#### Criterion 1b

- A.2 Compliance with the code shall be mandatory on code members.

#### Criterion 1c

- A.3 Code sponsors shall have independent disciplinary procedures available to deal effectively with cases of non-compliance.

#### Criterion 1d

- A.4 Code sponsors shall have adequate resources and be funded in such a way that the objectives of the code are not compromised.

### Preparation

#### Criterion 2a

- A.5 Code sponsors shall be able to demonstrate that members are prepared to observe its provisions.

### **Criterion 2b**

- A.6 Code sponsors shall be able to demonstrate that organisations representing consumers, enforcement bodies and advisory services have been adequately consulted throughout the preparation of the code.

### **Criterion 2c**

- A.7 Code sponsors shall be able to demonstrate that organisations representing consumers, enforcement bodies and advisory services are being adequately consulted throughout the operation and monitoring of the code.

## **Content**

### **Criterion 3a**

- A.8 The code shall include measures directed at the removal or easing of consumer concerns and undesirable trade practices arising within the particular sector.

### **Criterion 3b**

- A.9 The code shall require that code members ensure that their relevant staff know about and meet the terms of the code as well as their legal responsibilities. Appropriate training is to be provided.

### **Criterion 3c**

- A.10 The code shall address clear and truthful marketing and advertising as appropriate to the sector.

### **Criterion 3d**

- A.11 The code shall address clear and accessible pre-contractual information as appropriate to the sector.

### **Criterion 3e**

- A.12 The code shall address high-pressure selling as appropriate to the sector.

### **Criterion 3f**

- A.13 The code shall address clear terms and conditions of supply and fair contracts as appropriate to the sector.

### **Criterion 3g**

- A.14 The code shall address delivery and completion dates as appropriate to the sector.

### **Criterion 3h**

- A.15 The code shall address cancellation rights as appropriate to the sector.

### **Criterion 3i**

- A.16 The code shall address guarantees and warranties as appropriate to the sector.

### **Criterion 3j**

- A.17 The code shall address protection of deposit or prepayments as appropriate to the sector.

### **Criterion 3k**

- A.18 The code shall address after-sales service provisions as appropriate to the sector.

### **Criterion 3I**

- A.19 The code shall address the additional effort/help to be provided to vulnerable consumers as appropriate to the sector.

## **Complaints**

### **Criterion 4a**

- A.20 The code shall include a requirement that code members shall have in place speedy, responsive, accessible and user friendly procedures for dealing with consumer complaints. A specific reasonable time limit for responding to complaints shall be prescribed.

### **Criterion 4b**

- A.21 The code shall include a requirement that code members shall offer maximum co-operation with local consumer advisers or any other intermediary consulted by a consumer when making a complaint.

### **Criterion 4c**

- A.22 The code shall include procedures for dealing with complaints including the availability of conciliation services directed at arranging a decision acceptable to both parties.

### **Criterion 4d**

- A.23 The code shall include the availability of a low-cost, speedy, responsive, accessible and user-friendly independent redress scheme to act as an alternative to seeking court action in the first instance.
- A.24 The scheme shall be binding in respect of code members who shall not be able to refuse to allow a complaint to go before the scheme if a customer so chooses.

- A.25 The code member shall be bound to accept a judgement made under the scheme. Any such scheme shall be able to take into account possible breaches of the code where relevant to the complaint.

## **Monitoring**

### **Criterion 5a**

- A.26 The code sponsor shall develop performance indicators, for example, mystery shopping exercises and independent compliance audits, to measure the effectiveness of the code.

### **Criterion 5b**

- A.27 The code sponsor shall implement and publish the results of the performance indicators to demonstrate the effectiveness of the code.

### **Criterion 5c**

- A.28 The code sponsor shall publish a report annually on the operation of the code including in particular the numbers and types of complaints referred for conciliation and to the independent redress system. It would be preferable if the report were compiled by an independent person or body with powers to recommend actions.

### **Criterion 5d**

- A.29 The code sponsor shall provide copies of the annual reports to the OFT.

### **Criterion 5e**

- A.30 The code sponsor shall regularly review the code and update its provisions in the light of changing circumstances and expectations.

## **Criterion 5f**

A.31 Consumer satisfaction shall be regularly assessed.

## **Enforcement**

### **Criterion 6a**

A.32 The code sponsor shall establish a procedure for handling non-compliance by members with the code. The procedure shall include reasonable time limits.

### **Criterion 6b**

A.33 The code sponsor shall also set out a range of sanctions, for example, warning letters, fines, termination of membership, for dealing with non-compliance.

## **Publicity**

### **Criterion 7a**

A.34 Code sponsors and members shall ensure that their customers are aware of the code.

### **Criterion 7b**

A.35 Code members are to make clear, for example, in advertising, point of sale, their adherence to a code of practice.

### **Criterion 7c**

A.36 Copies of codes shall be available without charge to customers, to members, to local consumer advisers and to others with a legitimate interest.

### **Criterion 7d**

- A.37 Copies of any code related publicity generated by the code sponsor shall be provided to the OFT.

### **Criterion 7e**

- A.38 Code sponsors and members shall publicise the fact that the OFT has approved the code by using the agreed OFT logo.

## **B SUMMARY OF RECOMMENDATIONS**

### **Challenging criteria**

#### **Recommendation 1**

B.1 We should amend the wording of criteria 5b and 5c as follows:

- 5b - The code sponsor shall implement the performance indicators and make available to all interested parties the results of their monitoring procedures and satisfaction surveys to demonstrate the effectiveness of the code.
- 5c - The code sponsor shall provide a written report annually to the OFT on the operation of the code to include changes to the code implemented or considered, the numbers and types of complaints including information on outcomes from the conciliation process and the independent redress scheme. The results from monitoring, satisfaction surveys and the disciplinary process should also be included. It would be preferable if the report were compiled by an independent person or body with powers to recommend actions.

#### **Recommendation 2**

##### **Criterion 3j**

B.2 We acknowledge that criterion 3j may be difficult for some code sponsors to meet, but there remains the ongoing risk of consumers losing money by unprotected prepayments in a number of sectors. As, at first consideration, the situation appears to have changed little over the 20 years since the OFT first considered this issue we believe the requirement for code sponsors to meet this criterion still remains. However we are keen to obtain the views of advisory bodies, code sponsors and other interested parties on this issue to obtain a wider perspective of its relevance and importance now. Consideration may also be given to repeating the OFT consumer surveys of 1984 and 1992 to

provide as up to date picture as possible of the prevalence and effect of prepayments.

## **Amendments to structure**

### **Recommendation 3**

- B.3 Criteria 1b and 2a should be amalgamated to read: 'Codes shall include a provision that compliance with the code is mandatory. Code sponsors must be able to demonstrate that members are prepared to observe the code's provisions.'

### **Recommendation 4**

- B.4 To move criterion 1c from its existing location in Organisation and combine with the existing criterion 6a. The new criterion (6a) would read: 'Code sponsors shall establish a procedure for handling non-compliance by members with the code. The procedure shall include independent disciplinary procedures and reasonable time limits.'

### **Recommendation 5**

#### **Criterion 1d**

- B.5 In order to clarify the existing requirement under this criterion the wording should be amended to read 'Code sponsors shall have adequate resources and funding to ensure the objectives of the code are not compromised.'

## **Recommendation 6**

### **Criterion 3k**

- B.6 In order to reflect more accurately the existing wider definition of the term 'after-sales' the wording of criterion 3k should be amended to read 'The code shall address customer service provisions as appropriate to the sector.'

## **Recommendation 7**

### **Criterion 4b**

- B.7 In order to clarify the existing requirement under this criterion, the wording should be amended to read: 'The code shall include a requirement that code members shall offer maximum co-operation with local consumer advisers or any other intermediary consulted by and/or acting on behalf of a consumer when making a complaint.'

## **Recommendation 8**

### **Criterion 4d**

- B.8 To amend the wording in the criterion to read: 'The code member shall be bound to accept a decision made under the scheme.'

## **Recommendation 9**

### **Criterion 6a**

- B.9 To amend the wording to read: 'The procedure shall include reasonable timescales for action.'

## **Recommendation 10**

### **Criterion 7d**

- B.10 To amend the wording to read: 'Copies of any code related publicity generated by the code sponsor shall be provided to the OFT in advance of publication.'

## **Recommendation 11**

### **Criterion 7e**

- B.11 To update the criterion as follows:

'Code sponsors and members shall publicise the fact that the OFT has approved the code by using the CCAS logo in the prescribed manner.'

## **Recommendation 12**

### **Criterion 7f**

- B.12 Introduce a new criterion to set out the obligations under the CCAS copyright licensing procedures.

## **OFT Race Equality Scheme 2003**

### **Recommendation 13**

- B.13 The guidance for criterion 1a should be amended under Typical evidence to include examples of an organisation's previous involvement in raising standards in a sector with significant community group or ethnic minority presence.

## **Recommendation 14**

- B.14 It is important that representative groups are consulted if there is consumer detriment concerning particular communities or ethnic groups in the sector. The guidance for criteria 2b and 2c should be amended under Typical evidence to include confirmation from code sponsors that they have considered, and where appropriate taken action, to include representatives of ethnic minority and community groups during the consultation process with advisory bodies.

## **Recommendation 15**

- B.15 The guidance for criterion 3a should be amended under Typical evidence to include confirmation from code sponsors that their codes include measures to address problems affecting ethnic minorities and other communities if there is identified detriment to these groups in the sector covered by the code.

## **Recommendation 16**

- B.16 The guidance for criteria 3d, 3f, 3h, 3i and 3l should be amended under Typical evidence to include confirmation from code sponsors that there is a requirement within their code that copies of literature will be made available to individual consumers on request in alternative formats as appropriate (other languages, Braille and audio) where advisory bodies have indicated there is consumer detriment affecting one or more groups within a sector.

## **Recommendation 17**

- B.17 The guidance for criterion 3l should be amended under More information to broaden the scope of the definition of vulnerable consumers to also include 'where English is not the first language and English is the only language in which material is available.'

## **Recommendation 18**

- B.18 The guidance for criterion 3I should be amended under Typical evidence to include confirmation from code sponsors that race equality issues have been considered and included as appropriate within the code.

## **Recommendation 19**

- B.19 The guidance to criteria 5c and 7a should be amended to include a requirement under Typical evidence that code sponsors and members will ensure that copies of the annual report/publicity literature will be made available to individual consumers on request in alternative formats as appropriate (other languages, Braille and audio) where advisory bodies have indicated there is consumer detriment affecting one or more groups within a sector.

## **C CONSULTATION QUESTIONS**

### **Question 1**

Are there any criteria other than 3j which you believe are difficult for code sponsors to meet? If so why?

### **Question 2**

Do you agree with the proposed amendments to criteria 5b and 5c? Is it clear what information is required and when?

### **Question 3**

Do you believe that the protection of prepayments and deposits should remain as a criterion within the CCAS despite the difficulties some code sponsors have in meeting it? If so why? Should 3j be amended – if so how?

### **Question 4**

Can you provide suggestions for how code sponsors could meet criterion 3j within sectors where prepayments/deposits are routinely taken?

### **Question 5**

Do the proposed amalgamations of criterion 1c, 2a, 1c and 6a help clarify what is required?

### **Question 6**

Do you agree with the proposed amendments to the wording of the specific criteria as set out in Chapter 6?

### **Question 7**

Are there other criteria which could be amended in order to improve clarity? If so please provide your reasoning and suggested amendments.

### **Question 8**

Do you agree with the proposed wording for the new criterion 7f?

### **Question 9**

Do you agree with recommendations 13 to 19 arising from the race equality impact assessment? If not, please give your reasons and suggestions.

## **D CONSULTATION GUIDANCE**

- D.1 This consultation is being conducted in line with the Code of Practice on Consultation. The Criteria are listed below. The full version can be accessed at [www.cabinet-office.gov.uk/regulation/Consultation/Code.htm](http://www.cabinet-office.gov.uk/regulation/Consultation/Code.htm)

### **The six consultation criteria for consultations by public bodies**

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about who may be affected, what questions are being asked, and the timescale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

## **Comments or complaints about the consultation process**

If you wish to comment on the conduct of this consultation or make a complaint about the way this consultation has been conducted, please write to:

Mr Mike Ricketts  
OFT Consultation Co-ordinator  
Office of Fair Trading  
Fleetbank House  
2-6 Salisbury Square  
London  
EC4Y 8 JX

Phone: 020 7211 8904

Email: [mike.ricketts@oft.gsi.gov.uk](mailto:mike.ricketts@oft.gsi.gov.uk)

## **E LIST OF CONSULTEES**

ABI – Association of British Insurers

ABIA - Association of British Introduction Agencies

ABTA - Association of British Travel Agents

Advantage West Midlands

Advice UK

African Caribbean Business Network

Age Concern (England/Scotland/Wales/Northern Ireland)

AMUSF – Association of Master Upholsterers and Soft Furnishers

ARLA – Association of Residential Letting Agents

ASAP – Association of Social Alarms Providers

Asian Business Development Network

Association of Disabled Professionals

BAR - British Association of Removers

Better Regulation Taskforce

BFM – The Association of British Furniture Manufacturers

BHTA – British Healthcare Trades Association

Bosch Car Services

Bournemouth Motor Traders Scheme

British Chamber of Commerce

British Institute of Professional Photography

British Pest Control Association

British Retail Consortium

BSI Product Services – Motor Industry

BVRLA – British Vehicle Rental and Leasing Association

CBI - Confederation of British Industry

Chinese in Britain Forum

Citizens Advice

Citizens Advice Scotland

Commission for Racial Equality

Consumer Support Network

Credit Services Association

Customer First - Devon County Council

DASA/NQA – Domestic Appliance Service Association

DEMSEA - Debt Managers Standards Association

Denplan Limited

Direct Marketing Association

Direct Selling Association

Disabled Living Centres Council

DTI – Department of Trade and Industry

EEDA - East of England Development Agency

EMDA - East Midlands Development Agency

Energywatch

ERA – The Energy Retail Association

Ethnic Minority Business Forum

Finance and Leasing Association

FSB - Federation of Small Businesses

GCCNI - General Consumer Council for Northern Ireland

Hampshire Local Trader Scheme

Help the Aged

Homes for Scotland

IILP- The International Institute of Licensing Practitioners

IMRG – Interactive Media in Retail Group

Institute of Consumer Affairs

Institute of Directors

Introduction Services Federation (ISF)

Isle of Wight Local Trader Scheme

LACORS

LDA - London Development Agency

Lift and Escalator Industry Association

Lincolnshire Local Trader Scheme

Mail Order Traders Association Ltd (MOTA)

MPA - Master Photographers Association Ltd

MVRA Ltd

NAEA – The National Association of Estate Agents

NAFD - National Association of Funeral Directors

NAPAS - National Association of Private Ambulance Services

National Association of Specialist Computer Retailers

National Consumer Council

National Consumer Federation

National Insulation Association

National Security Inspectorate

NWDA - North West Development Agency

Ombudsman for Estate Agents Company Ltd

One North East

Personal Computer Association

Photo Imaging Council Marketing Group

Photo Marketing Association International Ltd

Postwatch

Qualitas Furnishing Standards

Reading Local Trader Scheme

Refugee Council

Ricability

RICS – The Royal Institution of Chartered Surveyors

RMIF - Retail Motor Industry Federation

Safebuy

SAIF- National Society of Allied and Independent Funeral Directors

SCC - Scottish Consumer Council

Scottish Executive

SEEDA - South East England Development Agency

SMMT Ltd - Society of Motor Manufacturers and Traders Limited

SMTA – Scottish Motor Trade Association

South Yorkshire Local Trader Scheme

Stirling Local Trader Scheme

SWDA - South West Development Agency

The British Ambulance Association

The Carpet Foundation

The Claims Standards Council

The Consumer Credit Trade Association

The House Builders Federation

The National Approved Letting Scheme

The National Guild of Removers Ltd

STAR - The Society of Ticket Agents and Retailers

Trading Standards Institute

TUC - Trade Union Congress

VBRA Ltd - Vehicle Builders and Repairers Association Limited

Welsh Assembly

Welsh Consumer Council

Which?

Women Business Network

York Motor Trader Scheme

Yorkshire Forward