

# **SOGA Hub user assessment report**

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# 1 EXECUTIVE SUMMARY

## Background

- 1.1 In September 2010, the Office of Fair Trading (OFT) launched the Sale of Goods Act (SOGA) Hub - a free, online resource for retailers and other stakeholders to use to help sales staff fully understand and comply with the SOGA. It forms part of the OFT's strategic objectives to 'increase business awareness of the SOGA and minimise consumer detriment' and has been developed in partnership with the Trading Standards Institute, the British Retail Consortium, B&Q Home Retail Group and other partners in response to an evident need.
- 1.2 Key guiding principles behind the design of the SOGA Hub were: to provide an accessible choice of SOGA related materials that can be easily adapted, shared and digested reflecting the different needs of different audiences. Table 1.1 shows a break down of what content is available through the SOGA Hub website.

**Table 1.1: Breakdown of the SOGA Hub content**

<b>Training Materials</b>	<b>Promotional Materials</b>	<b>Variety of Formats for Ease of Use</b>
SOGA At a Glance	A3 Posters	Online
SOGA Explained	A4 Ads	PDF's
SOGA For Customers	A5 Flyers	Jpegs
SOGA In Session	Internet ads	Word
SOGA In Practice	E-mail footer	PowerPoint
SOGA Quick Quiz	Editorial (for internal and external publications and e-mails)	Formats for easy professional printing etc.

Source: the OFT SOGA Hub

- 1.3 Following the SOGA Hub's successful launch, qualitative research was undertaken to incisively understand its usage, role and value amongst target end users and inform any opportunities to further optimise engagement and, thus, achieving of its strategic objectives.

- 1.4 The research sample comprised 29 one hour depth interviews (a robust qualitative sample size). Sixteen with retailers representing a mix of business sectors, size (from small / medium enterprises or SMEs to large corporates) and job roles and 13 with other stakeholders drawn from business support organisations and local authority Trading Standards Services (TSS). All interviewees held responsibility for communicating or implementing the SOGA within their business or organisation. All were recruited from lists, provided by the OFT, featuring those who had either signed-up on the Hub to receive SOGA up-dates, been involved in the initial consultation process or targeted as part of the initial launch. Sample was drawn from across England, Wales, Scotland and Northern Ireland and a detailed breakdown is shown in Annexe B.
- 1.5 The purpose of this document is to report back on the key findings from this qualitative research study.

## **Key insights**

- 1.6 The SOGA Hub fills an evident gap and is widely endorsed by retailers and other stakeholders. Key identified strengths are its provision of relevant and supportive SOGA information in one easy to access place, from the authoritative and trustworthy OFT, in a manner that is user friendly, straightforward and engaging.
- 1.7 Through these strengths, the SOGA Hub is recognised as helping to overcome existing barriers to sourcing information on a subject area that is often considered complex, confusing, dry and difficult, time consuming to access and digest.
- 1.8 The primary use and role of the SOGA Hub and its materials are to refresh and inform oneself and to train others on the SOGA, with materials being incorporated into existing training programmes where they exist (particularly noted amongst larger retailers and other stakeholders) or facilitating the instigation of training practices (most noted amongst SMEs).
- 1.9 In addition, the SOGA Hub materials are being used to inform customer complaint response / mediation and guide SOGA transaction / compliance policy development.

- 1.10 Various business benefits are perceived and being experienced through the use and dissemination of the easily accessible and digestible SOGA Hub information and materials that include:
- Increased confidence / empowerment of staff through use of the training materials, in relation to both dealing with customer complaints and the delivery of SOGA training.
  - Improved time management-cost efficiencies through increased business understanding of SOGA. Specifically, improved SOGA understanding is believed to help reduce the number of queries from store staff to senior personnel / teams, reduce the number of escalated customer complaints / problems for senior teams to deal with and enable retailers (particularly less well informed smaller retailers) to set in place more effective preventative measures to minimise the risk and hassle of later customer claims. While these are anticipated benefits for some businesses, given relatively early days of SOGA Hub materials use, others report that they are already noticing positive impact in these areas.
  - Positive enhancement of business standing by using the SOGA Hub materials to externally promote awareness of and adherence to official SOGA guidelines and practice. This is particularly referenced by smaller businesses who feel they have not, historically, had such ready access to relevant materials in this area.
- 1.11 The most commonly used Hub resources are the training and education materials (for example, the At a Glance Guide, SOGA Explained, SOGA In Practice, SOGA Quick Quiz).
- 1.12 There is lower reported engagement with the promotional materials at present. This partly reflects users' own recognised time pressures in relation to being able to fully explore the site's offer but, also, the manner in which promotional materials are presented on the site as users are not instinctively understanding or engaging with their intended role.
- 1.13 Key identified opportunities to enhance future engagement with and use of the already widely appreciated SOGA Hub and its materials include:
- Provide more explanation and illustration within the site on the intended role of the various materials, including how they can be

best utilised and implemented (with this particularly key in relation to promotional materials) and suggest attendant business benefits in effective use (as recognition of direct business benefits will help fuel site engagement and SOGA practice). Considerations here include:

- employ business case studies to demonstrate use and benefits
- relate how usage can help staff – time and cost efficiencies
- revise the expression of certain headings so that they are more directional and inviting. For example, rather than 'Sign-up' for receiving SOGA up-dates, consider 'Request latest up-dates'.
- Broaden training and information access opportunities. For example:
  - make the Quick Quiz more interactive and directional by highlighting weak areas of understanding at the end, directing to areas on the site that can plug knowledge gaps and providing a certificate of achievement to print off for staff
  - make links to information sources within the site and to other relevant websites more obvious as they can feel hidden at present.
- Promote how to actively monitor business related benefits. Through this, help instil the merits in adopting best SOGA practice and use of the Hub materials in facilitating this. For example, suggest recording the type and frequency of SOGA related staff queries and customer complaints from initiation of use and comparing results to past enquiry levels and infer how improvements here will reflect well on the instigator.
- Keep the SOGA Hub and its benefits top of mind as end users acknowledge it is easy to let slip best usage intentions given other work related time pressures. For example, use nudge marketing in the OFT emails, prompting on potential usage opportunities and benefits.
- Heighten the OFT branding and website link on the Hub to invest further, and appreciated, authoritative credentials and information access.

## 2 SOGA HUB OVERALL SITE RESPONSE

2.1 The SOGA Hub is widely acknowledged and endorsed by all audiences as filling an evident, genuine sector gap. Alternative sources of information on the SOGA are generally considered to be complex, confusing, dry, time consuming to source and difficult to digest. The SOGA Hub is recognised as helping to overcome such barriers to sourcing and understanding SOGA information.

'Who ever did this should be proud' Large Retailer / from Consultation

'Brilliant resource, brilliantly done. It's filling a gap in resources for business to come to. There's nothing as accessible for them' Business Support Organisation

'Makes understanding complex, woolly legislation easy' Small Medium Enterprise (SME) Retailer

2.2 Key perceived strengths of the SOGA Hub site are its provision of relevant, supportive information in one easy to access place, from a credible and authoritative source (the OFT) and in a user friendly, informative and engaging manner.

2.3 The site design and content are particularly appreciated for the manner in which it:

- Makes a dry, complex and confusing area accessible, more interesting and easier to digest through its straightforward language and appealing design.
- Facilitates easy tailoring of information to ones needs, through the choice of 'pick 'n' mix' materials which are, by and large, considered easy to self select for personal manipulation and sharing.

2.4 Words often and variously used to describe the SOGA Hub are: easy, friendly, simple (language), interesting, informative, concise, modern, fun, funky, quirky, an idiots guide, spot on (in terms of content).

'The law is very dry. This lightens it up, lightens the message' Large Retailer / from Consultation

'The simplicity of how it's been put across is good. It's not jargon' Large Retailer

'At first I didn't think we'd use it, I didn't think we needed more information. But it's been very useful, tremendously helpful' SME Retailer

'It's interesting reading, it attracts you to read it. Playful, not boring and extremely, extremely useful'. SME Retailer

'Pitched it right. Very accessible, not text heavy, easy on the eye. All the content's there but no bearing on the stiffness of the legislation' Business Support Organisation

'Its beauty is its simplicity' Business Support Organisation

'As a free tool we think it's something good. It's an all round winner' Local Government Trading Standards

2.5 A minority can question the colourful, 'informal' design of certain site elements though, commenting that this aspect seems at odds with the OFT's expected sense of authority, too 'gimmicky' for a serious subject and to feel more consumer, rather than business, oriented thus risking confusion over who the site is intended for. The few who hold these views are more evident amongst TSS and a minority of self described 'old school' retailers.

2.6 Despite these comments over the look and feel of the site, all still endorse the excellent information and express an intention to use the site. They also acknowledge that this approach is probably relevant and suitable for the majority of retailers.

2.7 Beyond this, issues are identified in relation to:

- Lack of understanding of the site's full offer and potential. This situation partly reflects users' own acknowledged time constraints and, thus, inability to fully explore the Hub's total offer to date. It also reflects, however, the fact that time challenged individuals only review content which proves immediately 'obvious' to them in terms of relevance and application. As such, evidence suggests opportunity to more clearly sign-post, explain and illustrate the role and value of certain site content, with this most telling in relation to the under used promotional materials.
- Ease of opening and downloading certain materials. In particular, difficulty is noted in relation to opening and accessing the Flash Internet Ads within the site's promotional materials section.

### 3 SOGA HUB USAGE AND BENEFITS

#### SOGA Hub usage and role

3.1 Awareness of the SOGA Hub is being generated by a number of different sources. The most frequently referenced one being the OFT emails (type none specified). Thereafter, references are also made to:

- TS Today (the Trading Standards Institute's Journal), the OFT Website, work colleagues' advocacy (either verbally mentioning the site or emailing details, a link) – with these particularly mentioned by large businesses, TSS and business support organisations.
- General 'Googling' for information on SOGA leading individuals to the Hub site, The Federation of Small Businesses website – with these primarily mentioned by SME retailers.

3.2 Motives for initially visiting the SOGA Hub primarily reflect a proactive, genuine desire to be better informed and keep up to date with SOGA. Only a minority (a few SME retailers), state visits to be a reactive response to isolated customer sales issues. More specifically:

- For those in TSS, business support organisations and large retailers, keeping abreast of SOGA is a recognised, accountable duty within their formal job role. As such, they are likely to seek out and review any new SOGA related information drawn to their attention.
- For SME retailers, interest can be pricked by receiving information announcing the SOGA Hub and promise of SOGA information from (and critically) a familiar, trusted, and authoritative source – the OFT.

3.3 In relation to frequency of visiting the Hub, two to four times since first visit appears to be the average (particularly where first visit occurred over three or four months ago). Although some report more frequent visiting behaviour, up to at least once or twice a week.

- 3.4 As to which SOGA Hub areas and materials are being used, the primary focus at present is on those relating to SOGA information and training. Here, main areas of reported interest are SOGA Explained, SOGA In Practice and Quick Quiz. Some reference is also made to SOGA in Session.
- 3.5 These materials are being accessed through the top banner of the Homepage for online referencing and the Download section for downloading documents directly onto PC's (for easier access) or printing off hard copies.
- 3.6 A key reason for this focus on information and training materials is the 'obvious relevance' of how these items can be used to beneficial ends.
- 3.7 In contrast, the Promotional Materials section attracts more limited engagement, with low reported exploration of this area. This reflects the lack of illustrative explanation as to how these materials might be beneficially used and the fact that, in absence of this explanation, Hub users are not intuitively seeing the potential against their business or training needs.
- 3.8 Indeed, a key finding is the tendency for many Hub users to focus on elements that appear 'obviously relevant', given time constraints / other work demands, and to leave those elements which are less obvious. As such, providing clear explanation and illustration as to possible uses and roles of materials on the site is one of the main recommendations from this study.
- 3.9 As to site behaviour, early visits are being used to review information on the Hub and understand its potential role / value at a personal level and in a broader business context. Elements identified as being of particular interest are, more often, downloaded onto a PC and / or printed off for easy further reference.
- 3.10 In addition, there are some reports of the Hub having been set up as a 'favourite' website or quick link from the desktop (where there is easy internet access at place of work) and promoting of the Hub to other immediate colleagues whom it is felt would benefit from being aware of the site.

3.11 As to how Hub information is being used, a wide range of roles are recognised and reported, with the primary ones being:

- refresh, up-date oneself
- inform, educate oneself (stronger reference amongst SME retailers)
- internal staff training
- external training (referenced by business support organisations and TSS)
- inform, guide transaction policy / terms and conditions development
- inform, guide customer complaint response and mediation.

3.12 A key point of note before SOGA Hub usage is fully discussed, is that while relevant information is already being absorbed and used in a personal context, the broader application and dissemination of SOGA Hub information and materials can vary:

- Across different organisation type. That is, whether one is a business support type organisation versus a retailer.
- Within the retail sector itself, reflecting size of retailer, job role / responsibilities of those who instigated Hub engagement and corresponding level of SOGA understanding, practice and training of staff in this area.

3.13 In summary, reported adoption and dissemination of SOGA Hub information in a broader business context, in these still early months post launch, is relatively more widespread amongst SME retailers, where the process is noted to be much easier. Here, tangible staff and business related benefits can be reported.

3.14 Larger retailers and other business support type organisations typically have well established, structured SOGA implementation practices and training programmes already in place. As such, the broader incorporation and dissemination of SOGA Hub information and materials can prove far more complex and involved, requiring much greater time leads.

- 3.15 As a result, and in context of these types, two broad SOGA Hub relationship scenarios emerge:
- Those who have already incorporated SOGA Hub materials into training programmes and are actively disseminating information in a broader context. Here, as with many SME retailers, actual staff and business related benefits are being experienced and reported.
  - Those who express genuine intent to disseminate SOGA Hub information to staff, within a broader business context, but are still in the planning or early implementation stage. Here, very relevant usage applications and benefits can be perceived, but the combination of the complexities involved in syncing Hub information with existing practices and other work commitments / time constraints can result in the SOGA Hub and its materials slipping down the task priority agenda.
- 3.16 An arising implication from this is the need to keep the SOGA Hub, its materials and, critically, attendant usage benefits top of mind through relevant marketing and communications (for example, referencing in the OFT e-mails).
- 3.17 With this in mind, use of the SOGA Hub and its materials, by different user type, is now discussed in detail.

### Large business SOGA Hub users and usage

- 3.18 Those responsible for instigating use of the SOGA Hub are noted to be in positions where keeping abreast of SOGA information is an accountable part of their job role. Job titles include Head of Consumer Affairs, Consumer Affairs Manager, Legal Compliance Manager and Group Legal Manager. Responsibilities variously include the setting, enforcing and consultation on compliance regulation within the business, managing and advising on escalated consumer complaints, consulting on and influencing staff training programmes and the training of their own teams. As such, they are typically well informed on SOGA, have ready, easy access to SOGA information via various sources and find it relatively easy to extract, interpret and apply SOGA information within their business.

- 3.19 SOGA training is already an established part of structured staff training programmes which are delivered both face to face to smaller, more senior staff teams responsible for the training of others or advising on SOGA related issues, and disseminated via Intranet Based Training packages (IBT's) to wider staff audiences.
- 3.20 Against this backdrop, the SOGA Hub and its information / training materials are widely appreciated as providing both:
- An easy, quick reference check / refresher at a personal level, with all having reviewed SOGA Explained, SOGA At a Glance, Quick Quiz (majority have used this to test their own knowledge), SOGA In Practice and In Session.
  - Useful, simple and engaging training aids which can be cherry picked to reflect their specific training needs.
- 3.21 The general consensus is that information within the Hub is already known personally, but that it affords strong relevance to broader staff training.
- 3.22 As to actual usage, reflecting the relatively short period of time since Hub launch, many large businesses are still in the process of reviewing and benchmarking materials against their own structured training programmes and determining how best to incorporate the different elements the Hub has to offer. A key point of note here is that this can represent a lengthy and time consuming process, both in relation to personally reviewing and incorporating information and in seeking sign-off to any training programme changes from other interested, senior parties. As such, while many express good intent to incorporate elements of the SOGA Hub into training materials and can already have a good idea as to how this might be achieved, they also acknowledge that this can slip from immediate agendas given other work demands.
- 3.23 Having said that, some are already actively incorporating and promoting SOGA Hub materials within official training programmes, with real benefits being recognised as a result – as discussed shortly.
- 3.24 The Hub link and SOGA Explained are also being introduced to immediate team colleagues for them to review.

3.25 In terms of how SOGA Hub materials are or will be disseminated, the identified tendency is to cherry pick and dovetail relevant elements into formal training modules. Features considered most useful here are:

- SOGA At a Glance – considered a useful, easy aide memoir for all to be aware of and to facilitate consideration of SOGA practice within training.
- The Quick Quiz – appreciated as a fun, interactive tool to kick start and end training sessions, testing individuals' knowledge.
- SOGA In Practice – illustrative scenarios appreciated by all as a means by which to bring best SOGA practice to life and help internalisation. Many are selecting (or plan to) relevant scenarios from this and using them to refresh and expand their own existing examples.
- SOGA In Session – more fragmented interest, given existing training presentations can be in place. However, some reports of either having taken the PowerPoint presentation in full and tailoring to specific needs or selecting relevant elements for inclusion into presentations.

'Saved me time having all the relevant information I need in one place. I don't have to trawl through the web to find stuff on training'  
Large Retailer / from Consultation

3.26 In terms of whom this training is then delivered to and how it is disseminated, primary, first in line targets are Unit Managers involved in Customer Services and those involved in the training of Store Managers and Store Staff.

3.27 Options for wider dissemination to Store Managers and Store Staff are often still under review, with evident deliberations as to how best to achieve this and effectively add into the mix of existing training. Two broad options are under consideration here, both with perceived merits and drawbacks:

- Inclusion as part of formal training modules, thus ensuring official training occurs. Potential barriers to this route:

- Staff time-cost efficiencies impact by taking staff away from their main job for a specified period of time.
  - A risk of overloading staff with too much training as they receive a lot regarding various statutory laws at present.
  - A need to weigh up the benefits against actual need, as store staff usually cascade serious problems up to Customer Services.
- To disseminate as an informal additional training resource, promoting the Hub site on the company's intranet (already planned by some) or by encouraging Store Managers to introduce elements within store staff huddles using In Practice examples and the Quick Quiz. A potential drawback to this is the lack of control over consistency of delivery.

'Store managers are kings of their own castle quite often. So this would help give them more resources and remind them of their obligations' Large Retailer

3.28 Detailed exploration of the SOGA Hub during research also flags other usage opportunities not previously considered by many, particularly in relation to the Hub's promotional materials. Identified opportunities here:

- Promoting the SOGA Hub / SOGA awareness to staff. For example, by deploying the A3 posters in staff tea rooms, tailoring the editorial feature for use in the staff magazine, referencing the Hub (Hub link, logo, description) within daily intranet communications or using the email footer for internal communications to relevant departments.
- Promoting SOGA information and their company's adherence to best practice to customers, in context of both helping to better inform customers of the law and as a positive PR exercise. Perceived opportunities here, not previously considered, include referencing the Hub and providing a link on the customer facing website, referencing the Hub in customer catalogues or using the SOGA Hub email footer when responding to complaints. Note: not all believe this to be feasible due to strict corporate communication guidelines.

## Small medium enterprise (SME) retailer users and usage

- 3.29 Businesses interviewed ranged from long established retailers to new start ups and store based / directly customer facing outfits (in the main) and a few online retailers also frequenting trade fairs.
- 3.30 Job titles of those responsible for interest in the SOGA Hub range from:
- Company Owners, Directors, Partners, particularly in the smaller, under 25 employee businesses, responsible for all business related issues including dealing with customer problems and staff training.
  - Through to Customer Services Manager, Complaints Compliance Manger and an E-commerce Assistant, in more medium sized businesses, primarily responsible for managing customer problems and complaints and training staff on SOGA.
- 3.31 Existing SOGA engagement is mixed, ranging from the more conscientious, informed who try and keep abreast through various information sources but report finding the process complex, confusing and time consuming through to those who are more ill informed and have, historically, adopted an almost cavalier attitude towards keeping themselves and, where applicable, their staff informed.
- 3.32 Against this, the SOGA Hub is widely endorsed, with active use reported to:
- Educate and up-date self on SOGA. Here, particular use is being made of SOGA Explained (many have printed off hard copies), In Practice (with the scenarios proving useful to help better understand situations), the Quick Quiz (which all have done, sometimes more than once) and the At a Glance Guide (which has either been printed off and put up in the office or is being referenced online during customer queries).
  - Inform transaction policy and terms and conditions development to ensure customers clearly understand options from the outset and help minimise the risk of problems later down line. In this context, the glossary can be particularly appreciated for its simple explanation of terms which can be inserted into documents.

- Inform customer complaints response and mediation, using Hub materials to both guide phone conversations and to ensure referencing of correct legislation, terminology and explanations in letters.
- Train, educate staff on SOGA. Again, the Quick Quiz and In Practice scenarios prove popular, facilitating fun, interactive and informative in-house training. While At a Glance can be used as a useful aide memoire to have up in the office area. Plans to review and use the In Session presentation are also expressed.

'Gives me quick, easy access to locating an answer if there's a genuine problem. Have we got to replace the goods, pay them back or are they (the customer) trying to take us for a ride?' SME Retailer

'The Collections Department don't always understand the OFT links and phrasing. But I've shown them this so all can understand' SME Retailer

'I've managed to up-date and revise our pay out policy with this, so it matches the descriptions in the Glossary. In the past we've had to pay out on some legal cases, but this will help us be clearer' SME Retailer

- 3.33 In addition, some reference is made to promotional materials, such as printing off posters and positioning them in staff areas. More typically though and as with large retailers, the potential role of promotional materials is not fully understood or considered.

### TSS and business support organisations users and usage

- 3.34 Reported job roles and responsibilities here are wide ranging and variously encompass the provision of SOGA related information and advice to others, mediation in disputes between traders and customers, internal training of staff and running of external training courses to local business, consumer groups and schools / students either studying business law or running their own youth business enterprise schemes.
- 3.35 As with large retailers, these organisations have well established, structured training programmes in place that already incorporate SOGA related information. Also, the individuals themselves feel well informed

on SOGA, in the main, with easy access to a wide range of information sources.

3.36 Again, the SOGA Hub is widely endorsed as providing useful and complimentary support to their existing information, with various active uses reported or planned in relation to:

- Internal (staff) and external (business groups, consumer groups, schools and students) training, with references made to:
  - SOGA In Practice and the Quick Quiz - to stimulate more interactive and fun debate and refresh and up-date existing sets of scenarios.
  - At a Glance guide – to be copied into existing PowerPoint presentations and used in hand-out packs at the end of sessions.
  - The cutting and pasting of other elements into existing presentations. For example, the Hub logo to signpost and raise awareness, illustrations from within the promotional materials section to help uplift the visual look of SOGA related points being made.
- Directing individuals to the Hub. Both work colleagues through direct referencing or emailing a link to the Hub, and external parties such as association members and consumers contacting them with queries.
- Refreshing their own knowledge by reviewing SOGA Explained and At a Glance and testing themselves with the Quick Quiz.

'Feedback from the staff is positive. Information at their finger tips'  
Local Government Trading Standards

'We already use scenarios in training, but this was great. Helped me refresh, add something new to the mix and less boring for me'  
Business Support Organisation

'The real strengths for me lie in the At A Glance Guide, great to follow through if someone's on the phone and the scenarios help refresh me. Good to see the law in practice, how real bread and butter questions can be interpreted'  
Business Support Organisation

- 3.37 As with other end users though, there is evident opportunity to further maximise Hub usage potential overall and particularly in relation to the promotional materials.
- 3.38 Specifically with regards to the promotional materials, again usage opportunities are not being fully explored, yet can be readily envisaged on detailed consideration. For example:
- Promoting SOGA on the organisation's website, by having a link or featuring an internet ad. In this context, some reference was made to a recent Advertising Standards Association campaign, whereby organisations have been approached and asked to feature a promotional banner on their website for a set period of time.
  - Use of the SOGA email footer when corresponding.
  - Promoting the existence and potential role of promotional materials to their business members where they can see a relevant role.

### **SOGA Hub benefits**

- 3.39 The majority of SOGA Hub users do sense and ascribe positive business benefits to SOGA Hub usage.
- 3.40 Broadly, perceived benefits encompass enhancing time management thus profit efficiencies and encouraging more proactive and assertive action to avoid claims or pay outs thus enhancing revenue.
- 3.41 All benefits have been variously experienced across the collective research sample, although the extent of experience varies at an individual, business level.
- 3.42 At present, benefit assessment in a business context is more often subjective, as those instigating up-take and usage of the Hub information typically rely on perceived versus physically recorded changes, or reports and feedback from others who have been introduced to the site.
- 3.43 Indeed, few businesses report structured systems in place to tangibly monitor and assign impact.

- 3.44 There is also a sense that it is still relatively early days, since initial SOGA Hub launch, for any significant impact to have filtered through.
- 3.45 As mentioned though, definite benefits are perceived and anticipated, with these fuelling active Hub information engagement.
- 3.46 In all, findings indicate definite benefit in promoting and seeding thoughts of possible business benefits through the adoption and dissemination of SOGA information contained on the Hub, via communications, with this affording real potential to:
- Encourage the desire to achieve best SOGA practice amongst those already engaged with the SOGA Hub.
  - Generate new SOGA Hub interest and information adoption.
- 3.47 Table 3.1 overleaf now details a breakdown of specific benefits ascribed to the use and dissemination of information contained within the SOGA Hub.

**Table 3.1: A breakdown of specific SOGA Hub usage benefits**

SOGA Hub role / use	Experienced and Perceived Benefits
<p><b>SOGA Hub identified training benefits (internal or external), cited by all</b></p>	<p><b>Saves time:</b> via access to off the peg materials that are ready to use, bar some initial tailoring.</p> <p><b>Refreshes existing courses:</b> By providing access to new material to draw upon, that can help explain SOGA in an easy, simple, fun manner and, through this, help information absorption.</p> <p><b>Adds gravitas / credence:</b> Through the ability to reference and brand the source of training information as being from the OFT.</p>
<p><b>SOGA Hub usage and identified business related benefits, cited by retailers</b></p>	<p><b>Senior staff are more confident and better able in the training of others.</b></p> <p><b>Staff are more confident and empowered in customer dealings which, in turn, can lead to improved time management – cost savings.</b> That is, staff which are better informed and able to call upon and cite SOGA policy from an official, independent source are noted to be more comfortable in fielding initial customer issues and better able to deal with a wider range of situations. This, in turn, is felt and / or tangibly noted to have a positive cascade effect, by:</p> <ul style="list-style-type: none"> <li>- Reducing the number of queries from store staff to senior personnel / teams as staff are better equipped to field customer queries.</li> <li>- Reducing the number of escalated customer complaints for senior teams to deal with as staff are better able to explain SOGA related policies and practices and resolve issues in a manner that is more satisfactory to customers.</li> </ul> <p><b>Cost saving per se:</b> That is, improved SOGA understanding helps retailers avoid issues that can lead to later customer claims and better protect selves by:</p> <ul style="list-style-type: none"> <li>- Taking more informed, preventative measures through clearer and correct setting out of SOGA related terms and conditions upfront, at the outset of the sales process.</li> <li>- Take more assertive action against customers with perceived unjust claims versus just giving in, which some report having done so.</li> </ul> <p><b>Positively enhance business status / standing:</b> Through the external promotion of the fact that they aware of and adhere to official SOGA policy and guidelines. This is particularly noted by SMEs, although some (more so young companies) can express nervousness in externally promoting, in case it ‘puts ideas in consumers’ minds’, thus creating more issues versus resolving them.</p>

Source: HPI Qualitative research with business users of the SOGA Hub

### 3.48 Quotes that help illustrate these benefits:

'From day one you can set out the right guidelines and avoid the risk of them (customers) coming back. It helps you make sure they know where they stand and avoid future hassle' SME Retailer

'Occasionally you do get customers who are unreasonable. Knowing it's there is helpful. It gives my staff back-up, confidence, they can draw a customer's attention to it. Before, if they were challenged, they would just give in' SME Retailer

'Better training can help filter out a lot of issues before they can escalate. And longer term will hopefully reduce the number of calls to my team' Large Retailer

'Lots of wins with this. Waste less time, more staff confidence, save money' Large Retailer / from Consultation

'On launching this with customer services I made a strict rule that they weren't allowed to call legal unless they'd looked at it (the SOGA Hub) first. Calls have gone down since then. It's hard to attribute one thing, whether the number of complaints have dropped, whether staff are reading the Hub and feeling more confident. But the type of calls we're getting (from the staff) are also more sensible. They're not asking as many silly questions or those directly answered by the training' Large Retailer / from Consultation

## 4 IN CONCLUSION: SOGA HUB FUTURE OPPORTUNITIES

- 4.1 The Hub is widely endorsed and appreciated as a training and information tool that also affords business benefits through its use (such as increasing staff confidence, time and cost efficiencies).
- 4.2 However, its full potential is yet to be maximised. Users are only delving into areas that 'obviously' speak to them and they do not instinctively understand how to put elements into practice (particularly the promotional materials). This partly reflects users' own recognised time pressures (not yet taken or found time to fully interrogate the Hub in context of their business), but also site related issues.
- 4.3 Against this, certain areas of opportunity have been identified to help enhance engagement, maximise use and, ultimately, fully realise the potential business benefits effective use can afford.

### Key identified areas of development opportunity

- 4.4 **Illustrate how to implement the SOGA Hub and its materials.** That is, suggest how to use the site, explain what its role can be, and how organisations might use specific sections and materials to best meet their needs. There is a particular need to explain how the promotional materials can be used as, at present, this is the least utilised section of the site. Considerations here include employing business case studies to help illustrate the potential use and value of materials in a business context. It may also be worth revisiting certain headings to make them more directional and inviting, for example changing 'Sign-up' to 'Request Latest Up-dates' and introducing a website map that is specific to the Hub (as the present site map relates to the OFT website).
- 4.5 **Broadening the training and information role** as this is a key selling point of the site. This could be done by making elements more interactive and directional, for example the Quick Quiz could be enhanced by a summary at the end that highlights areas of personal weakness and directs to areas on the Hub that can plug knowledge gaps. Also, as the Quick Quiz is being used to assess the effectiveness of training, there may be merit in providing a printable certificate for staff to have upon successful completion.

- 4.6 In addition to suggestions around the Quick Quiz, merit identified in making existing links to other SOGA related sites more obvious, as at present they can feel buried within SOGA Explained, and in providing more links to external information sources to cover other 'grey areas' on consumer and retail law or distance selling. This development presents opportunity for the SOGA Hub to be used as a gateway to more in-depth investigation – a desire which can be expressed.
- 4.7 **Suggest and seed thoughts of potential business benefits.** Illustrate how usage can help staff and improve time and cost efficiencies by, for example, demonstration through business case studies and quotes. Ultimately, such understanding will help with site engagement and encourage best SOGA practice.
- 4.8 **Promote the tangible monitoring of usage benefits, suggesting ways to achieve this and resulting potential benefits.** Examples of this in practice, captured through the research, include recording and monitoring the type and frequency of staff queries or the number and types of customer issues and complaints. This process will help instill greater understanding and appreciation of the value in good SOGA practice and the role of the Hub in facilitating this. Further, it should be suggested that the effective monitoring of positive performance impact can be used as a positive reflection tool for the instigator.
- 4.9 **Keep the SOGA Hub current and top of mind** by using nudge marketing in the OFT emails to prompt on usage of the SOGA Hub and the potential opportunities and benefits in doing so. This is key as, even with the best intentions, users acknowledge that plans for the Hub materials can slip down the priority scale amidst other work demands.
- 4.10 **Heighten the OFT branding on the site and make the link to the OFT website more obvious.** Something that can be actively called for to lend the site further authority and 'clout', giving retailers and their staff increased confidence when using materials in delivering training programmes and dealing with difficult customer disputes.

## Other specific development considerations

- 4.11 **Promotional materials** – Provide more clarification and directional, illustrative explanation of possible roles to enhance understanding as to potential usage and value. Hub users need to understand how to use the materials, in what situations and what benefits they can offer – considerations which can be overlooked at present. Also, suggest different types of usage from different user perspectives, to make the materials even more relevant. For example, for a retailer suggest how it could be used to promote internally to staff or externally to customers, while for business support organisations stimulate consideration of highlighting the materials to retailers and encouraging them to adopt.
- 4.12 **Guide to promoting the SOGA Hub** – Consider ways to enhance the role of this Guide, by revising and reframing the nature of content so that its focus is more on how to use and implement the materials. That is, make it more of a 'Guide to Using the SOGA Hub'. A possible consideration here could be to include more practical, tangible explanations on how to use materials. Also, up-date the 'editorial' feature (which currently focuses on the Hub launch) and consider the potential in featuring background on the Hub project in a different area of the site as, while this can be of interest, a user's focus is on how best to use the materials.
- 4.13 **Sign-Up** – Give this area more prominence by, for example, featuring it at top of the homepage as it is currently hidden at the bottom. Many SOGA Hub users are keen to receive SOGA related updates when prompted. A more inviting and clarifying title such as 'Request latest updates' is also advisable as 'Sign-up' is unclear for some and can invite questions as to 'what am I signing up for?'
- 4.14 **SOGA Explained** – Opportunities identified to heighten the value of information delivery for this item on the site. Specific suggestions encompass appearance of the Glossary explanation when one clicks on the individually highlighted words within the SOGA Explained text (for example, via a pop up text box) and more prominent promotion of links to other information sites.

- 4.15 **Quick Quiz** – This is a highly popular and engaging feature, with usage frequently reported to educate, refresh ones self and help train and test other staff. As such, suggest merit in seeking ways to further enhance its value and propensity for continued, repeat use. Identified opportunities here comprise refreshing questions and consider having more than one quiz (on different SOGA related themes and areas). Also, as it is currently used in conjunction with training, it would be worth developing its educational role by, for example, providing a summary at the end of the quiz on areas where one is weak and direction to relevant information either within the Hub or links to other sites to 'brush up' further. In addition, there are some calls for the opportunity to print off a form of certificate of achievement, to give to staff, on successful completion.
- 4.16 **SOGA At a Glance** – The online interactive version has high usability. However, many companies do not have internet access, with training and information delivered via their intranet. As such, calls received to make it possible to download an interactive version of At a Glance, for wider dissemination and use with a business.
- 4.17 **SOGA In Practice** - Continue to add to, refresh and grow the list of scenarios to cover more areas (for example, include higher ticket items). Also consider the inclusion of actual legal, case law studies to provide unequivocal, definitive examples of the law in practice.
- 4.18 **Template Letters** - Some calls for the inclusion of template letters to help structure complaint response. These calls are particularly from SME's who are often less familiar with and trained in this area.

# ANNEXE(S)

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## **A RESEARCH OBJECTIVES**

A.1 Detailed research objectives were to incisively understand:

- The 'What, Why, and How' the SOGA Hub and its resources are used by retailers and other stakeholders.
- Delivery of the Hub and its materials against expectations and needs and identification as to what these are.
- Perceived value of and benefit in using the SOGA Hub and its resources, including identification of any positive business performance impact and how this is assessed.
- Opportunities to optimise Hub engagement and performance against target end users needs.

## **B RESEARCH APPROACH AND DESIGN**

- B.1 This research represents the first detailed investigation into perceptions on and usage of the SOGA Hub since its launch. The adopted approach was qualitative in nature, given the requirement to access in-depth, sensitive insights at this stage. Findings from this study will be used to inform development of more robust, evaluative quantitative research, should it be adopted at a later point in time.
- B.2 The research was conducted in April 2011.
- B.3 A depth interview methodology was selected as the one on one environment provides the ideal private forum in which to drill down into individual experiences and elicit more open, honest responses on a subject where differing attitudes, behaviour, needs and sensitivities are known to exist.
- B.4 The majority of interviews were conducted via phone to enable greater geographical reach within a more time and cost effective manner and provide a more convenient interview format by which to secure co-operation of time stretched individuals. All respondents had internet access during the phone interviews, so that the SOGA Hub content could be fully explored within discussions. One face to face interview was held in London.
- B.5 The sample was randomly recruited from lists comprising a mix of those who had taken part in the initial SOGA Hub consultation process, signed up to receive latest SOGA up-dates on the Hub itself or had been targeted as part of the initial SOGA Hub launch. As such, they were self defined as interested in SOGA. The lists were provided by the OFT.
- B.6 A total of 29 one hour qualitative depth interviews were conducted with a mix of 16 retailers and 13 other stakeholders. This represents a robust qualitative design from which to draw valid insights and conclusions. All respondents held responsibility for communicating or implementing SOGA within their business or organisation.

B.7 The 16 retailers provided a mix in terms of business type, sector, size and location. Table B.1 shows a breakdown of retail respondents by company size and job title / role of those recorded as having initiated interest in the SOGA Hub. Table B.2 shows the retailer sample split by location.

**Table B.1: Breakdown of Retailer Sample**

Retailers by company size (number of employees) and job title / role				
1 - 5 (4)	6 – 25 (3)	26 – 100 (3)	100 - 1000 (2)	1000 + (4)
Company Owner	Director	Complaints Compliance Manager	Training Manager	Head of Consumer Affairs
Partner	General Manager	Ecommerce Assistant	Customer Service Supervisor	Consumer Affairs Manager
Proprietor	Customer Services	Partner		Legal Compliance Manager
Company Director				Group Legal Manager

Source: HPI Qualitative research with business users of the SOGA Hub

**Table B.2: Retailer sample split by location**

England North	England South	England Midlands	Scotland	Wales
7	6	1	1	1

Source: HPI Qualitative research with business users of the SOGA Hub

B.8 Retail sectors included floor coverings, home blinds / shutters, home goods, furniture, soft furnishings, iron mongers / agricultural appliances, jewellery; antiques, flowers, vehicle financing, solicitors, DIY, domestic appliance accessories, toys and stationery / books.

B.9 The 13 other stakeholders comprised a mix of seven business support organisations and six TSS.

B.10 Of the business support organisations, three were Trade Associations, while the rest represented legal consultation, lecturing in commercial legal matters, Consumer Advice Service and an Ombudsman.

B.11 The table below ( Table B.3) shows other stakeholders split by location:

**Table B.3: Other stakeholders split by location**

	<b>Local Government Trading Standards (6)</b>	<b>Business Support Organisations (7)</b>
<b>England North</b>	2	1
<b>England South (including South East and South West)</b>	3	4
<b>England Midlands</b>	1	1
<b>Northern Ireland</b>		1

Source: HPI Qualitative research with business users of the SOGA Hub