

Renewable Energy Consumer Code

8 September 2023

Background Information

Renewable Energy Assurance Limited (REAL), subsidiary of Association of Renewable Energy and Clean Technology has operated a Code of Practice (Renewable Energy Consumer Code) approved under the Consumer Codes Approval Scheme (CCAS) since 2006. The Code has been adapted over the years to reflect Government Initiatives, including the earlier Feed-in-Tariff incentive scheme (that is now closed) and the Domestic Renewable Heat Incentive (that closed 31 March 2022) but also to reflect the needs of some members by introducing a pay as you go membership in conjunction with the Micro-generation Certification Scheme (MCS).

The Code has been expanded to accommodate businesses who wished to work in the related Battery Storage Systems sectors. REAL is embarking on a new Primary Authority Partnership with Surrey Trading Standards reinforcing their intentions to provide the highest level of support to members and maintain consumer protection in the sector. There are currently 4,230 members of the Code.

Audit Process

The audit was carried out remotely by a Trading Standards Practitioner from the Chartered Trading Standards Institute (CTSI).

The audit focused on the following areas:

1. Outstanding actions/observations from last audit
2. Any planned changes to the Code or to the operation of the Code
3. Member application process, including checks carried out on prospective businesses
4. Member auditing - content and process, including general compliance with the code, staff training and dealing with consumer complaints
5. Sanctions for non-complaint member businesses
6. Any disciplinary cases in previous year
7. Consumer complaints process, including ADR
8. Customer satisfaction, information/complaints from enforcement agencies, and how this information is used to develop and improve the Code

Following the due diligence check, if there continues to be concerns about an applicant, dependant on the nature and seriousness of those concerns, their application may be:

accepted subject to conditions

accepted on a temporary basis, which may include being subject to conditions referred to the Independent Applications Panel (IAP)

Monitoring Existing Members

RECC use a variety of tools to monitor compliance with the Code and Bye-Laws in line with their Monitoring Strategy, including:

- extensive due diligence checks on all new applicants (1,387 applicants)
- members subjected to risk-based Compliance Checks (215)
- members randomly chosen for audits (40 all desk based)

Monitoring total as percentage of all members in 2022: 54%

A Compliance Check consists of top-level risk assessment analysis and the member is not usually involved in the activity. Compliance Check assessments include an assessment of , including website(s), social media and any online reviews, a full financial check on the business and the individuals involved in the business, a review of insurance and MCS installation records, and full analysis of complaint information recorded on the RECC and MCS complaints databases, including any paperwork given to the complainant by the member. A record is made of the results of each Compliance Check, along with the recommended action and the relevant key Compliance Areas which have been flagged as a risk for each member.

, a full Compliance Check will be undertaken on the business. During 2022, 215 members were the subject of a Compliance Check.

- Eight members who had recorded inadequate insurance information on the MID
- 55 members about whom there had been two or more complaints within a set period of time or a single complaint of particular concern
- 11 members who had registered a higher than average number of installations on the MID over a set period of time; and
- Eight members about whom information was received about their compliance with the Code from a consumer and/or industry stakeholder

Of these, 63 were allocated for a desk-based audit, 115 were sent compliance communications regarding insurance and/or issues found with their online marketing, for four members carry out further monitoring; place ten members in the disciplinary process, refer three members to the Membership Team to make administrative changes to their membership records and take no further action in the case of 20 members.

Where a decision is made to allocate a member for an audit, the member is first sent a Self-Assessment Compliance check to complete and asked to submit a set of core documentation for review. The full response is then assessed against a standard auditor questionnaire, which is evaluated against the ten key compliance areas. The questionnaire is completed by the auditor based on the m -assessment compliance check and the documents submitted.

To pass an audit, the member must be compliant in the seven high priority Compliance Areas and two of the three medium priority areas. Each section of the questionnaire (the sections relate to the ten Compliance Areas) is weighted according to the questions applicable to each member.

Once the Auditor has completed the questionnaire, it is returned to RECC who will determine

Members who were members when the consumer signed the contract and 31 related to businesses who had never been members of the Code. Complaints against current or former members were handled through the Dispute Resolution Process, except for complaints about former members where the business is no longer trading or where the business has become a member of another CTSI approved consumer code.

Of the 3,037 Code members in 2022, only 135 had a complaint registered against them, meaning that 96% of members did not have a complaint registered against them in 2022.

In 2022, RECC successfully resolved 81 disputes, 22 involvement, 40 and 19 were resolved by the Independent Arbitration Service.

Of the 81 Team,

