

RECC Code of Practice

Approved Consumer Code

Audit September 2026

Background Information

The Renewable Energy Consumer Code (RECC) is approved under the CTSI Approved Code Scheme and is administered by Renewable Energy Assurance Limited (REAL). REAL maintains a Primary Authority arrangement with Surrey and Buckinghamshire Trading Standards. During the reporting period, updated model documents, including the RECC Model Complaints Procedure and Model Contract Terms, were approved through the Primary Authority arrangement and made available to members.

At the end of 2025 RECC had 5,444 members. At the time of the audit membership stood at 5,168.

Audit Process

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

The audit focused on the following areas:

1. Outstanding actions/observations from the 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, including general compliance with the Code, staff training and dealing with consumer complaints
5. Sanctions and disciplinary processes for non-compliant member businesses
6. Marketing, advertising and member support
7. Consumer complaints process, including ADR
8. Customer satisfaction and feedback, and how this information is used to develop and improve the Code

There were no outstanding actions, recommendations or observations identified in the pre-audit information.

Audit Summary

RECC provided detailed information and supporting evidence for the audit. A number of changes have taken place during the reporting period, including amendments to the Code relating to consumer protection legislation, complaint handling and ADR, together with operational developments including new digital services, a dedicated Members' Area and increased member support. The Code has also been updated to reflect the revised ADR arrangements and changes in relevant consumer protection legislation.

RECC explained that the environment in which the Code operates has changed and that Code membership is no longer driven to the same extent by external requirements. RECC considers that this has affected membership and means that greater emphasis is now required on demonstrating the value of membership, differentiating the Code and engaging effectively with members. This is reflected in its increased focus on member support, digital resources and communicating the benefits of Code membership.

Member Application Process

During 2025 RECC received 1,273 applications. Of these, 1,157 were accepted, including 14 applicants accepted for a period of Temporary Code Membership, and five were rejected. The remaining applications were either still being processed, withdrawn or awaiting a final decision. Temporary membership may be used where concerns are identified which require additional monitoring but are not considered sufficiently serious to warrant rejection.

RECC operates a documented application and due diligence process which includes checks on the applicant business and associated individuals, financial and regulatory information, online presence, insurance arrangements and consumer-facing documentation. Two completed applications and supporting records were reviewed as part of the audit, together with evidence relating to temporary membership and refusal of membership. The evidence demonstrated an established process for assessing applicants, challenging information where appropriate and seeking further information or applying additional controls where concerns are identified.

Withdrawal from Membership

During 2025, 780 members left the scheme through cancellation, lapse or termination, including 32 whose membership was terminated for non-compliance

with the Code and/or Byelaws. Examples of membership withdrawal and the associated correspondence were reviewed as part of the audit.

RECC also discussed the reduction in overall membership. It explained that changes within the wider sector have affected the way some businesses assess the value of Code membership and that membership is no longer driven to the same extent by external requirements. RECC is therefore placing greater emphasis on member engagement, increasing awareness and demonstrating the practical benefits associated with membership.

Monitoring Existing Members

RECC operates a risk-based monitoring framework incorporating compliance checks, desk-based and site-based audits, complaints information and other monitoring activity. It aims to monitor 20% of its membership each year through its various monitoring activities and aims to complete 60 audits during 2026. Five recently completed member audits were provided for review as part of the audit.

Monitoring information reviewed identified recurring issues across a number of areas, including staff training and knowledge and the correct use of Code branding and logos. RECC's wider trend analysis also identifies issues relating to financial information, support for vulnerable consumers, financial protection arrangements and certification requirements, with guidance and other interventions used in response.

During the audit, RECC discussed staff training in particular and explained that engaging smaller businesses with formal training can present practical challenges alongside the day-to-day running of the business. RECC has sought to make compliance information more accessible and engaging and to provide members with different opportunities to understand and meet their obligations. The dedicated Members' Area supports this approach by providing access to training, guidance and other compliance resources.

Members in the Disciplinary Process

At the time of the audit four members were within RECC's disciplinary process. A completed disciplinary case was reviewed and demonstrated how information arising through dispute resolution can identify recurring concerns relating to matters such as complaint handling, customer service and the effectiveness of internal procedures.

The evidence showed that RECC sought further information from the member concerned, including details of its complaint handling arrangements, processes and the action being taken to address the issues identified. Following consideration of the

response and remedial action, RECC concluded that sufficient measures had been put in place to address the concerns and the disciplinary action was closed. The case provided evidence that complaint and adjudication information can trigger compliance and disciplinary action where recurring concerns are identified.

Marketing and Advertising by Member Businesses

RECC provides members with guidance on marketing and advertising requirements through the Code, member communications, training material and resources available within the Members' Area. New members receive compliance information and access to the appropriate RECC and CTSI Approved Code logos. Compliance is monitored through compliance checks, audits, complaint investigations and the review of members' websites, advertising and sales material.

Incorrect display or use of logos continues to be identified through monitoring activity. RECC discussed this during the audit and confirmed that it continues to reinforce the requirement with members through guidance, communications and compliance activity.

Terms and Conditions and Other Pre-Contractual Information

During the reporting period, updated RECC Model Contract Terms and a Model Complaints Procedure were approved through the Primary Authority arrangement and made available to members. Consumer-facing documentation also forms part of RECC's application and wider compliance monitoring processes.

The application information reviewed as part of the audit demonstrated that contractual and other consumer-facing documentation forms part of the due diligence process and may be subject to further enquiry where additional information or amendments are required.

Customer Service Provisions

RECC provides members with a range of information, guidance and training to support compliance with the Code and wider consumer protection obligations. New members are required to complete RECC's online training within two weeks of joining the scheme, and members also have access to online training modules and examinations, guidance, newsletters and compliance updates.

RECC advised that staff training remains an area where some members require additional support, particularly smaller businesses. It has therefore sought to improve engagement by making learning and compliance information more accessible and by providing practical resources through the Members' Area. The approach discussed

during the audit demonstrated an emphasis on encouraging engagement with compliance requirements rather than relying solely on formal written guidance.

Dispute Resolution Process

From 20 January 2026, ADR for RECC members and their consumers has been provided through Green Homes Dispute Resolution (GHDR). ADR is mandatory for RECC members and consumers who are unable to resolve a complaint directly with a member have access to the dispute resolution service. Complaints submitted before 20 January 2026 continue to be handled under the previous arrangements.

RECC advised that the ADR service is now delivered in-house through GHDR and considers that this provides benefits in terms of retaining specialist sector knowledge and improving the flow of information between dispute resolution, compliance and wider Code activities. RECC also advised that complaint volumes have increased and considers that greater awareness of the service may be one contributing factor. A proportion of contacts received fall outside the scope of the scheme, including where the business concerned is not a RECC member or has ceased trading.

Complaint information is also being used to support member learning. RECC advised that two webinars had been delivered during 2026, with a further webinar planned, covering complaint issues and recurring themes, and that case studies are also used to support learning. A brief Learning and Knowledge Strategy was provided which sets out a process for reviewing complaint themes and using identified issues to inform communications, webinars, case studies, training and guidance.

Customer Satisfaction and Feedback

Consumers are invited to provide feedback through the Consumer Satisfaction Questionnaire, which enables them to comment on their experience across key areas covered by the Code. Feedback received is reviewed by RECC to identify trends and support monitoring of member performance.

RECC recognises that response rates to the questionnaire are currently low and is exploring ways of making it easier for consumers to provide feedback, including the development of a simpler rating and feedback mechanism. Other consumer feedback received through calls, emails and enquiries is also recorded within its case management arrangements and can be used to support monitoring and analysis.

Conclusion

RECC continues to operate an established and appropriately resourced framework for administering and monitoring the Renewable Energy Consumer Code. The audit found evidence of appropriate scrutiny of new applicants, risk-based monitoring of existing members and the use of disciplinary processes where significant or recurring concerns are identified.

RECC continues to identify areas where members require additional support, including staff training and compliance with branding requirements, and is using guidance, training and member communications to address these issues. The development of the Members' Area and the wider emphasis on making compliance information accessible also demonstrate a continued focus on member support and engagement.

RECC is operating within a changing market and recognises that it needs to demonstrate more clearly the value of Code membership. At the same time, the introduction of the new ADR arrangements has provided closer links between dispute resolution, compliance activity and member learning, with complaint themes being used to inform webinars, case studies and wider guidance.

Overall, the audit found no significant issues that would prevent RECC from continuing to operate as an approved Code under the CTSI Approved Code Scheme.