THE MOTOR OMBUDSMAN
The Motor Industry Code of Practice for Service and Repair
Desktop Audit – July 2026

Background Information

The Motor Industry Code of Practice for Service and Repair is one of the most established Consumer Codes, having been launched in 1976 as the Motor Industry Code of Practice and later endorsed by the Office of Fair Trading (OFT) in 2011.
The OFT brought in the new Consumer Codes Approval Scheme (CCAS) under the Enterprise Act 2002. Following the demise of the OFT, the CCAS is administered by the Chartered Trading Standards Institute (CTSI). The scheme is now called the Approved Code Scheme.

The Motor Ombudsman (TMO) (formally known as Motor Codes) has been approved by the Ombudsman Association (OA) to operate as an Ombudsman since November 2016. Their four Codes of Practice have since been adapted in line with Ombudsman processes with all accredited businesses migrated over from Motor Codes. These Codes have many similarities in the way in which they are managed, and the sanctions applied to accredited businesses who may breach a Code.

The four Codes are:

- The Motor Industry Code of Practice for New Cars
- The Motor Industry Code of Practice for Vehicle Sales
- The Motor Industry Code of Practice for Vehicle Warranty Products
- The Motor Industry Code of Practice for Service and Repair

Many businesses are accredited to more than one Code of Practice.
The Code has been modernised and updated to reflect the ongoing non-traditional ways in which consumers own and maintain their cars, as well as the growth in alternatively fuelled vehicles and new technologies such as driver assistance systems and self-driving features

The latest version of the TMO Service and Repair Code was launched on 1st June 2025.

Audit process

A qualified Chartered Trading Standards Institute Practitioner from the Chartered Trading Standards Institute (CTSI) carried out a desktop audit.

- The accredited business application process, including checks on prospective businesses.
- Accredited business auditing - content and processes
- Terms and conditions
- Marketing and advertising by accredited businesses
- Sanctions for non-compliant accredited businesses
- Customer service provision (including support for vulnerable consumers)
- The consumer complaints process (ADR)
- Customer satisfaction
- Training provided by Code members to meet their obligations
- Any outstanding issues from the 2025 audit

Audit summary

Summary

The Code continues to provide efficient and effective consumer protection in the automotive sector.

Accredited Business Application Process

Applications typically begin with an e-mail or phone call from the prospective business to TMO's Business Services Department. The prospective member will liaise with a member of the department who will answer any questions and explain the application process. Following the conversation, an application form is issued.

Once the business has returned their completed application form a member of the Business Services department will review the information provided and conduct a pre-check of the business. This includes looking at reviews and information available via the internet and checks on Endole (business information software), which collates Companies House information.

If the assessment does not flag up any concerns, the application will be processed with the organisation marked as a provisional accredited business (new applicant). The application will be passed to the Compliance Team who will work with the business to complete an evidenced based self-assessment.

Once the business has passed their self-assessment, they will be fully accredited to The Motor Ombudsman and will receive their Welcome Pack.

Existing accredited business inspections/audit

Auditing of Code members is undertaken as part of a risk based compliance framework, aligned to the requirements of the Codes of Practice. All new applicants are subject to initial application checks and an evidence based self assessment prior to accreditation. Ongoing oversight is carried out through complaint handling, ADR casework, intelligence received and compliance monitoring.

Where any concerns are identified, or where enhanced scrutiny is appropriate based on risk or compliance history, onsite audits may be carried out. Audit activity is recorded and reviewed and outcomes are used to inform ongoing compliance and monitoring arrangements.

2025 Audit Activity

- Total number of Code members (2025): 4,839
- Number of audits carried out (2025): 450
- Percentage of overall membership audited (2025): 10%

Accreditation withdrawal and sanctions for non-compliant accredited businesses

Accredited businesses receive penalty points for instances where they are non-compliant or fail to comply with an adjudication. These points may be awarded to the business for a relatively minor infringement, for example failing to respond to an adjudicator within the allotted time period due to an absence from the business. In such instances, an adjudicator can opt to remove penalty points should they feel the mistake to be genuine and a one-off.

The system issues the first written warning for 30 points, then a further written warning for 60 points and at 80 points the business will be referred to TMO's Independent Compliance Assessment Panel (ICAP) who will consider the appropriate sanction, which could be a further warning, extended-suspension or expulsion from the Code. Suspension can be applied at any time at the discretion of the TMO if the business refuses to co-operate.

Currently no accredited businesses are in the disciplinary process.

Marketing and advertising by accredited businesses

All new businesses accredited to the Service and Repair Code receive a Welcome Pack upon joining which includes a Getting Started Guide, copies of the Code and Consumer Guides for staff training and customer awareness.

Some accredited businesses attend TMO Committee meetings. These sessions include workshops on consumer law, case data and trends and information obtained

from various external bodies on best practice such as the Ombudsman Association's casework group, which TMO attends, or guidance from the ASA impacting the industry. These topics are also covered during account management meetings and during training sessions or workshops held by TMO for accredited businesses.

TMO operates an ongoing website monitoring programme, which forms part of the accreditation self-assessment process. Businesses are asked to provide evidence of where the TMO logo and accreditation wording are displayed, including relevant website locations. In addition to information provided by businesses, the TMO team pro-actively checks website status to verify logo visibility and accreditation wording as part of its ongoing monitoring activity.

This evidence is reviewed and verified by TMO, with logo locations logged so that visibility can be monitored and where businesses are identified as not displaying the TMO logo or accreditation wording, follow-up action is undertaken by the Compliance or Business Services team.

To better monitor this coverage, TMO has developed a Smart Badge (following guidance previously received from CTSI) that provides analytical data on how widely it is being used. Another benefit of the Smart Badge is that it allows consumers to 'click to verify' that a business's accreditation is still active. This gives consumers instant peace of mind that they can turn to TMO should the need arise. The deployment of the Smart Badge continued during 2023 to increase logo usage amongst accredited businesses and tackle instances of misuse.

TMO works with manufacturers to ensure that as many as possible of their franchise dealers display both TMO and the Approved Code logo.

TMO monitors this information through a dashboard and Salesforce reports, which support oversight of accreditation evidence, logo visibility and follow-up activity. TMO state that as of Monday 13 July, 83% of businesses had a visible logo recorded.
For the audit five new applications were provided for review. None of these new members' websites display the logo. One mentions that they are members of TMO in their description of complaint handling and another mentions TMO under the headline 'Proud to be Industry Approved'.

Terms and conditions and other pre-contractual information

TMO does not mandate the use of a specific set of Terms & Conditions. Businesses are responsible for maintaining documentation appropriate to their operations and legal obligations.

TMO provides guidance, consumer-facing materials, Code documentation, accreditation branding materials and examples of good practice. The existence and suitability of consumer-facing documentation may be reviewed through self-assessment, compliance monitoring and audit activities where relevant.

Customer service provisions

TMO has training modules for accredited businesses on consumer legislation such as data protection, advertising and marketing and mechanical training.

As part of the self- assessment process TMO checks that businesses have undertaken some form of ADR training, either through TMO or an external party.

TMO has a policy to help assist vulnerable customers. This has been discussed at TMO Committee meetings and shared as an example of best practice to be adopted. If necessary, this can be tailored by businesses to assist staff in dealing with their customer queries.

The TMO Information Line provides information to consumers and businesses on their legal rights and obligations. The service is delivered by TMO's Customer Service Advisors who have all undergone automotive specific legal training.

Throughout the year TMO issues press releases to consumer and trade media and regularly provides guest articles for trade publications highlighting areas of best practice and industry insights. The success, reach and impact of The Motor Ombudsman's campaigns are measured through monitoring of website hits, social media reach and PR coverage generated.

TMO utilise webinars as a useful medium for providing direct and personalised training to businesses who are further afield. Topics include disputes trends in the motor industry and tips on identifying and assisting vulnerable customers, in addition to the use of case studies to best illustrate core messaging and principles.

As and when required, TMO provides information on the law, entitlements and obligations to businesses and consumers through their ADR team. The team has undergone mechanical training and industry-specific legal and. The majority of the positions require a legal degree or extensive ADR experience as an entry requirement.

Consumer complaints process

The ADR function at TMO is managed 100% in-house and the complaints process is included in the Code of Practice booklet, alongside TMO's contact details.

Consumers will first liaise with a customer service advisor either by webform, post, telephone or email who will assess the dispute to see if it falls within TMO's remit. If TMO cannot deal with the dispute, an enquiry is logged for monitoring purposes and the consumer is signposted to other organisations. A case file is created, and an enquiry form sent to the consumer. This form enables TMO to collect relevant details about the complaint – consumers complete it and send it back with any documentation they would like TMO to consider. Upon receipt, a Case Administrator will check that TMO has all the information they need, as well as verifying it does fall within remit and will then send the complaint to the business for their response.

Once the evidence has been received from all parties involved in the case and the case file has been collated, the Adjudicator will assess the complaint and either try and find an amicable resolution or deliver an outcome. If either party is unhappy with the outcome, the complaint may be referred to the Ombudsman. Both parties can submit additional information that may not have been available at the time of adjudication and the Ombudsman investigates the complaint further, before reaching a final decision. If the consumer accepts the final decision, it becomes legally binding on the accredited business.

TMO is certified as an approved ADR body under the ADR Regulations and is a member of the Ombudsman Association.

Customer satisfaction and feedback

TMO will review their online survey system in particular the requirement to outlaw fake reviews and ensuring businesses take reasonable steps to verify reviews to ensure compliance with The Digital Markets, Competition and Consumers Act 2024.
A summary of all aggregated customer feedback is reported on, on a yearly basis, and is presented within TMO's ICAP and Annual Reports.

Conclusions

The Motor Ombudsman operates an impressive system to provide protection for consumers throughout the ownership of their vehicle. It handles a large number of complaints relating to members but this is inevitable having regard to the number of vehicles on the road today and their servicing and maintenance requirements. The move to self-assessment with targeted intervention is considered to be an effective way of monitoring the Code. TMO has amended and modernised their Code to take account of the ever-changing product offered by industry and the evolving consumer willingness to engage in non-traditional retail options such as online purchase short term ownership etc.