Chartered Trading Standards Institute

AA Cars Dealer Promise Code of Practice
Approved Consumer Code
Audit August 2026

Background information

The AA is one of the UK's largest motoring organisations, with more than 14 million consumer members. Businesses participating in the AA Cars Dealer Promise Code recognise the trust associated with the AA brand and, through their membership of the Code, seek to provide consumers with confidence that they are committed to appropriate standards of service and conduct.

The AA Cars Dealer Promise has operated since July 2016. At the time of the audit, 2038 businesses were signed up to the Code. Participating dealers pay a monthly subscription and are able to advertise their vehicles through the AA Cars website.

AA Cars operates primarily as a used vehicle advertising platform. Although online vehicle sales continue to take place, AA Cars advised that many consumers still visit dealer premises to inspect vehicles before purchase.

The Dealer Promise Code sets requirements relating to vehicle standards, advertising, customer care, contractual information, complaint handling and annual dealer auditing. It is intended to promote consistent standards across participating dealerships and to provide consumers with access to support and mediation where concerns arise.

Audit Process

The audit was carried out onsite on behalf of the Chartered Trading Standards Institute by a Chartered Trading Standards Practitioner on 6 August 2026. The assessment included discussions with relevant AA Cars personnel, together with a review of documented procedures, systems, databases and sample records relating to the operation of the Code.

The audit focused on the following areas:

1. Member auditing and compliance monitoring, including staff training, complaint handling and monitoring of compliance with the Code;
2. Consumer complaints, mediation and Alternative Dispute Resolution;

3. Sanctions, escalation and membership termination arrangements for non-compliant businesses;
4. Member application and onboarding processes, including due diligence checks carried out on prospective businesses;
5. Member guidance, training, vulnerability, marketing and contractual information;
6. Management information, databases and annual figures; and
7. Code management, governance and continuous improvement, including the use of audit, complaint and other intelligence to develop and improve the Code.

Audit Summary

The evidence reviewed during the onsite audit indicates that AA Cars continues to operate an established and effective framework for managing the Dealer Promise Code. The Code is supported by structured application and due diligence processes, ongoing dealer monitoring, complaint and mediation arrangements, and guidance designed to assist members in meeting their obligations.

The personnel involved in the audit demonstrated a detailed understanding of the Code and its supporting processes. The approach described was consistently consumer focused, and the sample records and live dealer examples examined provided assurance that the documented procedures were being applied in practice.

AA Cars also demonstrated that information from dealer audits, complaints, mediation activity and wider market developments is reviewed and used to inform guidance, operational practice and the continued development of the Code.

Annual Dealer Auditing and Compliance Monitoring

AA Cars continues to monitor its dealer membership through a combination of scheduled contact, review activity and targeted physical audits. The audit established that the current membership comprises 2038 dealers and that information held within the dealer management system is used to support the planning and prioritisation of monitoring activity.

The monitoring approach takes account of the risk presented by individual dealers. Relevant factors include complaint levels, customer reviews, previous contact and compliance history, together with information received from Trading Standards or other sources. Where the available information indicates that further scrutiny is appropriate, the dealer may be selected for additional contact or a physical audit.

The audit included a review of the documented member audit process and a completed example relating to an individual dealer. Supporting evidence, including photographs taken during dealer visits, demonstrated that the process is used to assess the dealership and its vehicle stock in practice. The personnel involved were able to explain both the checks undertaken and the reasons for those checks, demonstrating a clear understanding of the purpose of the audit programme.

Where issues are identified, AA Cars seeks initially to educate the dealer and secure improvement. Follow-up communications are recorded and may include guidance setting out the action expected of the dealer. Matters that are not resolved, or which indicate a more significant risk to consumers or the AA brand, may be escalated through the sanctions and termination process.

The evidence reviewed provided assurance that AA Cars has an established approach to dealer auditing and compliance monitoring, supported by documented processes, dealer records and risk-based decision making.

Complaints, Mediation and Alternative Dispute Resolution

AA Cars operates an established complaints and mediation process to support consumers and participating dealers where issues arise following the purchase of a vehicle. Complaints are managed through a dedicated ticketing system, which enables individual cases, communications and outcomes to be recorded and monitored.

As part of the audit, the complaints and mediation process was discussed in detail, and a recent live case was reviewed. This provided assurance that complaints are considered in practice and that the relevant records are maintained. The personnel involved demonstrated a clear understanding of the process and described an approach focused on achieving a fair and proportionate outcome for the consumer and dealer.

AA Cars advised that the complexity and length of complaints have increased as consumers have become more aware of their legal rights and more able to prepare detailed submissions, including using artificial intelligence. Although this has not necessarily resulted in a comparable increase in the underlying number of disputes, it has increased the volume of information that must be reviewed and the resources required to manage individual cases. AA Cars has responded by adapting its resources and processes accordingly.

Complaint information is also used to identify recurring issues and changes in consumer expectations. This information supports wider trend analysis, dealer guidance and, where appropriate, compliance intervention. The evidence reviewed provided assurance that AA Cars has effective arrangements for recording, assessing and responding to complaints and mediation cases.

Sanctions, Escalation and Membership Termination

AA Cars operates a documented escalation process for dealing with members that do not meet the requirements of the Dealer Promise Code. The approach is generally focused on education and securing improvement, with more formal action taken where concerns are serious, repeated or remain unresolved.

The audit included a review of the relevant process documentation, template communications and a completed case involving an individual dealer. The evidence demonstrated that concerns may be managed through advice, formal correspondence, suspension and, where necessary, termination of membership.

AA Cars explained that cases are considered internally by the relevant personnel, with account taken of the nature of the concern, the dealer's engagement and the potential impact on consumers and the AA brand. The process includes arrangements for monitoring cases during a period of suspension before a final decision is made.

The evidence reviewed provided assurance that AA Cars has proportionate arrangements for escalating non-compliance and, where improvement cannot be secured, suspending or terminating dealer membership.

Applications and Due Diligence

AA Cars operates a structured onboarding and due diligence process for prospective members. The process is designed to confirm the identity and legitimacy of the applicant, assess the suitability of the dealership and establish whether the business can meet the requirements of the Dealer Promise Code.

The checks undertaken include verification of company and trading details, Companies House and insolvency searches, credit checks, and identity verification for sole traders. Where a business operates from a residential address, additional consideration is given to matters such as appropriate insurance and the suitability of the premises.

AA Cars also reviews the applicant's vehicle stock and trading presence. This includes confirming that the business holds an appropriate level of stock, reviewing photographs of the premises and vehicles and, where necessary, undertaking a physical visit. Online reviews and other publicly available information may also be considered where these indicate a potential concern requiring further investigation.

The onboarding process includes an explanation of the Dealer Promise Code and the standards expected of members, including requirements relating to vehicle condition, minimum MOT provision, advertising, customer care and complaint handling. The personnel involved demonstrated a clear understanding of both the checks undertaken and the reasons for those checks.

The audit included a review of the onboarding framework, pre-sign-up checks and completed examples relating to individual dealers. The evidence reviewed provided assurance that AA Cars has established and proportionate arrangements for assessing prospective members before admission to the Code.

Member Guidance, Training, Vulnerability, Marketing and Contractual Information

AA Cars provides members with access to a range of guidance and support intended to assist them in meeting the requirements of the Dealer Promise Code. This includes the Dealer Hub, direct support through a dedicated dealer support line and a single point of contact, together with regular communications and newsletters covering relevant legal and regulatory developments.

The audit included a review of the Dealer Hub, member communications, branding guidance and promotional material. The information available to dealers included guidance relating to consumer rights, vulnerable consumers, distance selling, advertising and pricing practices. Recent communications had also addressed fake reviews and the prohibition on additional mandatory charges being added after an advertised price, including the implications of the Digital Markets, Competition and Consumers Act 2024.

AA Cars explained that concerns identified through complaints, dealer monitoring or wider regulatory developments may result in targeted guidance being issued to members. Where isolated concerns arise, the initial approach is generally educational, with dealers directed to appropriate sources of information, including Business Companion guidance.

The audit also considered the support available in relation to vulnerable consumers. The Code requires dealers to provide appropriate time and reasonable assistance to consumers who may require additional support. AA Cars had made relevant guidance available to members and demonstrated an understanding of how vulnerability issues may arise in practice.

The evidence reviewed provided assurance that members have access to relevant guidance, support and standard information. AA Cars continues to encourage use of the Dealer Hub and other support channels, although use of the Hub is not routinely monitored.

Management Information, Databases and Annual Figures

AA Cars uses a combination of systems to manage information relating to its dealer membership and the operation of the Code. Core dealer information is held within a customer relationship management system, while complaints and mediation cases are recorded through a separate ticketing system. Specific reports and spreadsheets are also produced to support activities such as auditing, monitoring and management review.

Although information is held across more than one system, the audit established that AA Cars maintains effective control of its data and is able to produce relevant reports when required. The personnel involved demonstrated how information could be retrieved and used to support dealer monitoring, complaint handling and wider management oversight.

AA Cars advised that the ticketing system used for mediation activity is expected to be incorporated into the customer relationship management system. This should provide an opportunity to further consolidate information and support reporting across the different areas of Code activity.

The audit also established that AA Cars is considering and using artificial intelligence to improve the efficiency of some administrative and information-handling activities. The evidence reviewed provided assurance that the systems and reporting arrangements currently in place support the effective management of the Code.

Code Management, Governance and Continuous Improvement

AA Cars demonstrated that information from dealer audits, complaints, mediation activity and wider market developments is reviewed regularly to identify emerging issues and opportunities for improvement. Trend analysis is undertaken monthly and quarterly, with additional review where there is a significant change in complaint patterns, dealer performance or the wider regulatory environment.

The audit included a demonstration of the information held within the customer relationship management system and the analysis undertaken at both scheme and individual dealer level. This included consideration of complaint volumes, audit findings, root causes and changes in consumer behaviour.

AA Cars provided examples of where this analysis had resulted in changes to guidance and operational practice. These included communications concerning distance selling requirements, pricing practices and additional administration fees, together with guidance relating to potentially fake or misleading reviews. The development and promotion of the vehicle inspection programme was also cited as an example of the Code responding to identified consumer and market needs.
The personnel involved demonstrated a detailed understanding of the Code and explained how intelligence is evaluated before deciding whether changes are required to member guidance, monitoring activity or wider Code arrangements. The approach described was consistently focused on consumer protection and ensuring that dealers understood the practical reasons for the requirements placed upon them.

The evidence reviewed provided assurance that AA Cars uses audit information, complaint data and wider intelligence to support the continued development and effective operation of the Dealer Promise Code.

Conclusion

The evidence reviewed during the onsite audit indicates that AA Cars continues to operate the Dealer Promise Code effectively and in accordance with the principles of the CTSI Approved Code Scheme.

The audit identified established arrangements for dealer onboarding, due diligence, compliance monitoring, complaint handling, mediation, sanctions and the provision of guidance and support to members. The sample documents and live dealer records examined provided assurance that the relevant processes are being applied in practice.

The personnel involved in the audit demonstrated a strong understanding of the Code and the reasons for the requirements placed on participating dealers. The approach described throughout the audit was consistently focused on consumer protection and securing appropriate outcomes where concerns arise.

AA Cars also demonstrated that information from audits, complaints, mediation activity and wider market developments is analysed and used to inform guidance, operational practice and the continued development of the Code. Its systems and reporting arrangements provide effective oversight, notwithstanding that information is currently held across more than one platform.

No significant concerns were identified during the audit. There may be scope to further develop the approach to identifying and responding to potentially fake or misleading reviews, including consideration of relevant CMA guidance and clearer arrangements for notifying dealers where concerns are identified.

Overall, the evidence reviewed demonstrates that AA Cars continues to operate an effective Code which provides an established framework for dealer standards, consumer protection, complaint resolution and continuous improvement.