• 10% OF GLOBAL TURNOVER Pricing, reviews, descriptions, returns & sales practice

Consumer Protection Compliance Guidebook for Automotive Companies

All-in pricing, honest reviews, accurate descriptions and statutory rights: what the CMA and Trading Standards check, **and why a hidden admin fee can now cost 10% of turnover.**



10%
of global turnover: the CMA's new **direct fining power** (Apr 2025).

£4.2M
first CMA fine: a **£3 hidden fee** (Apr 2026).

100
businesses warned in the CMA's pricing sweep.

6 standards · 18 checkpoints · DMCCA · CRA · CCRs · Right way / wrong way · Ideal fix time

Apr 2025 CMA fining powers live → **Apr 2026** First fine · £4.2M → **2026** Dealer reviews probed → **The CMA says it is just getting started.**

WHY THIS GUIDEBOOK EXISTS

The CMA no longer needs a court. It can fine you directly.

Since April 2025 the **Digital Markets, Competition and Consumers Act** lets the CMA decide consumer law breaches itself and fine up to **10% of global turnover**. Its first cases were about hidden fees and fake urgency, exactly how cars are often priced and sold.

This guidebook covers the 6 consumer standards that matter most on a forecourt and online.

WHERE CONSUMER LAW BITES IN A DEALERSHIP

Pricing
Admin and prep fees in the headline price
CON-01

Reviews
No fakes, no filtering
CON-02

Listings
History, mileage, write-off category
CON-03

After the sale
30-day reject, 6-month presumption
CON-04

Online
14-day cancellation
CON-05

The desk
No false urgency
CON-06

WHO ENFORCES IT

CMA
Competition and Markets Authority
Direct fines up to 10% of turnover

Trading Standards
Local councils
Investigate complaints and prosecute

Courts
County court
Customer claims for refunds and damages

ASA
Advertising Standards Authority
Rules on misleading ads

WHO IT'S FOR

Dealer principals & directors
See the turnover-based exposure.

Sales, used & marketing managers
Know what every price and listing must show.

Auditors
Mystery-shop and check listings like the CMA does.

FINED ON TURNOVER, NOT ON THE FEE

A £3 fee. A £4.2 million fine.

The CMA's first fine under its new powers was for leaving a **£3 booking fee** out of the headline price. The ceiling is 10% of global turnover, and refunds come on top.

THE PENALTY LADDER

LEVEL 1

Refunds

Paying back affected customers.

LEVEL 2

£300,000

Minimum ceiling where 10% of turnover is lower.

LEVEL 3

10% turnover

CMA fine for consumer law breaches.

LEVEL 4

Prison

Criminal prosecution: unlimited fine, up to 2 years.

REAL CASES FROM US AUTOMOTIVE BUSINESSES

WHO	RESULT	WHAT HAPPENED
Automobile Association CMA · Apr 2026	**£4.2M** + £760K refunds	£3 mandatory fee missing from headline price on driving lessons.
StubHub UK CMA · Jun 2026	**£900K** + £590K refunds	Hidden fees at checkout.
Auto Park Norwich Trading Standards · Feb 2026	**£5,700** fine + costs	Sold a dangerous car without proper checks.

A £50M-TURNOVER GROUP

£5M

Maximum CMA fine at 10% of turnover.

PLUS

Refunds

Every customer charged the hidden fee is repaid.

AND THEN

Public

Decisions are **published by name**.

HOW TO USE THIS GUIDE

One page per standard. Price it right.

1. **Header**: code, area, owner and the maximum penalty
2. **The law**: which regulator and which regulation
3. **The cost**: fine, what else can happen and a real case
4. **Right / wrong**: illustrated pass and fail, plus how to audit

THE 6 STANDARDS

CON-01	All-in Pricing, No Drip Fees	DMCCA s.230	CRITICAL	10% turnover	72 hours	5
CON-02	Honest Reviews	DMCCA Sch.20	CRITICAL	10% turnover	Immediate	6
CON-03	Accurate Vehicle Descriptions	DMCCA s.226	CRITICAL	10% turnover	72 hours	7
CON-04	Right to Reject & Repair Honoured	CRA s.20–24	CRITICAL	10% turnover	72 hours	8
CON-05	Distance Sales: 14-Day Cancellation	CCRs 2013	CRITICAL	10% turnover	7 days	9
CON-06	No Pressure Selling	DMCCA s.227	CRITICAL	10% turnover	72 hours	10

IDEAL FIX TIME · COUNTED FROM AUDIT SUBMISSION

Immediate	Stop now · serious harm or clear breach	1 standard
72 hours	Fix within 3 working days	4 standards
7 days	Fix within 1 week · records, notices, training	1 standard

SCORING EACH CHECKPOINT

PASS
Every criterion met at the time of audit, with evidence captured.

FAIL
Any criterion not met at the time of audit. Record what you saw and who owns the fix.

N/A
Only where "Applies when" rules it out. Record why.

Note. Business-to-business sales (e.g. fleet) are outside most consumer protections. Sales to sole traders and consumers are covered.

CON-01 CONSUMER LAW · CMA · STANDARD 01 OF 06

All-in Pricing, No Drip Fees

Area **Marketing · Sales** | Person in charge **Marketing Manager · Sales Manager** | Regulator **CMA · Trading Standards**

MAXIMUM PENALTY

10%

of global turnover · CMA direct fine

Or **£300,000** if higher · plus customer refunds

• CRITICAL

THE LAW

DMCCA

Digital Markets, Competition and Consumers Act 2024 (Part 4, in force 6 Apr 2025) · **Consumer Rights Act 2015** · **DMCCA s.226–230**
misleading actions and omissions · material pricing information

WHAT WE CHECK

Every advertised car price includes all mandatory fees (admin, preparation, delivery if unavoidable), so the price shown is the price the customer pays.

CHECKPOINTS IN THE AUDIT

- **Q1** Does every advertised price include all compulsory fees (admin, documentation, preparation)?
- **Q2** Are genuinely optional extras clearly separated and not pre-selected?
- **Q3** Do the website, portals and forecourt show the same price?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

The CMA can fine directly, without going to court: up to **10% of global turnover** (or £300,000 if higher), plus **refunds** to affected customers.

BEYOND THE FINE

Trading Standards can also prosecute: unfair commercial practices are **criminal offences** with unlimited fines and up to 2 years in prison. Decisions are published.

REAL ENFORCEMENT

£4.2M

first CMA fine under its new powers (Apr 2026): the **AA** left a mandatory £3 fee out of the headline price. Plus £760K in refunds.

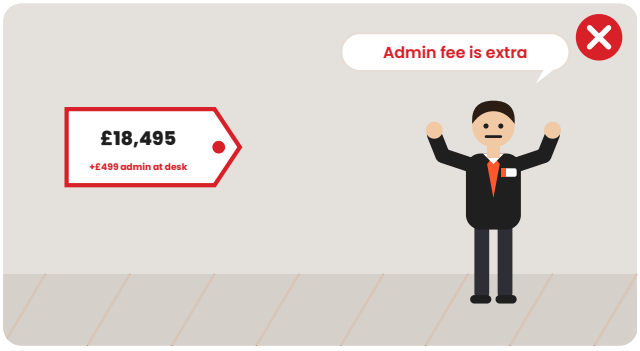
✔ RIGHT WAY



£18,995 including every compulsory fee.

✖ WRONG WAY

10% TURNOVER



£18,495 advertised, then +£499 admin at the desk.

PURPOSE

Drip pricing is the CMA's number one target. Its first fine under its new powers was for a hidden £3 fee.

FIX IT WITHIN

72 hours

AUDIT CRITERIA · PASS WHEN

- All mandatory fees in headline price
- Optional extras separate
- Same price on every channel

IDEAL WAY OF AUDITING

1. Check 10 listings on portals and website
2. Compare with an invoice
3. Ask for the fee list

Evidence: Screenshots + invoice sample.

WORST CASE A £3 fee cost the AA **£4.2M**. For a dealer group, 10% of turnover is the ceiling.

CON-02 CONSUMER LAW · CMA · STANDARD 02 OF 06

Honest Reviews

Area **Marketing · Customer relations**

Person in charge **Marketing Manager**

Regulator **CMA · Trading Standards**

MAXIMUM PENALTY

10%

of global turnover · CMA direct fine

Or **£300,000** if higher · plus customer refunds

• CRITICAL

THE LAW

DMCCA

Digital Markets, Competition and Consumers Act 2024 (Part 4, in force 6 Apr 2025) · **Consumer Rights Act 2015** · **DMCCA Schedule 20** banned practices: fake reviews, concealed incentivised reviews, misleading presentation of reviews

WHAT WE CHECK

The dealership never writes, buys or filters reviews, doesn't hide negative ones, and discloses any incentive given for a review.

CHECKPOINTS IN THE AUDIT

- Q1 Are fake or paid-for reviews never posted or commissioned?
- Q2 Are negative reviews never suppressed or filtered out?
- Q3 Is any incentive for leaving a review disclosed?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

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BEYOND THE FINE

Trading Standards can also prosecute: unfair commercial practices are **criminal offences** with unlimited fines and up to 2 years in prison. Decisions are published.

REAL ENFORCEMENT

Probe

The CMA opened an investigation (2026) into whether **one-star dealer reviews** on Autotrader were withheld from ratings.

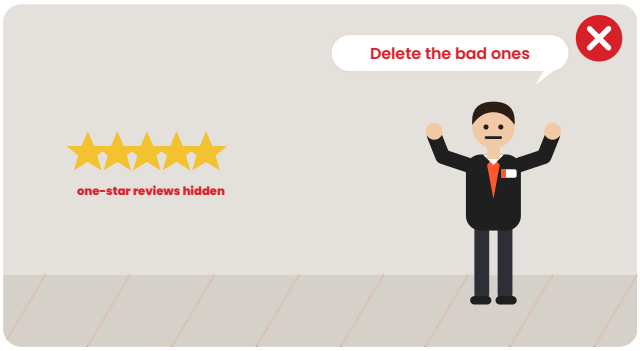
✔ RIGHT WAY



4.3 stars, every review shown.

✖ WRONG WAY

10% TURNOVER



5 stars because the one-stars were hidden.

PURPOSE

Fake and filtered reviews are now banned outright, whether or not anyone is misled.

FIX IT WITHIN

◷ Immediate

AUDIT CRITERIA · PASS WHEN

- ✓ No fake or bought reviews
- ✓ No suppression
- ✓ Incentives disclosed

IDEAL WAY OF AUDITING

1. Check review platform settings
2. Ask how reviews are requested
3. Compare staff-requested reviews with sales

Evidence: Review policy + platform settings.

WORST CASE A banned practice needs no proof of harm: straight to **up to 10% of global turnover**.

CON-03 CONSUMER LAW · CMA · STANDARD 03 OF 06

Accurate Vehicle Descriptions

Area **Used cars · Marketing** | Person in charge **Used Car Manager**

Regulator **CMA · Trading Standards**

MAXIMUM PENALTY

10%

of global turnover · CMA direct fine

Or **£300,000** if higher · plus customer refunds

• CRITICAL

THE LAW

DMCCA

Digital Markets, Competition and Consumers Act 2024 (Part 4, in force 6 Apr 2025) · **Consumer Rights Act 2015** · **DMCCA s.226** misleading actions · **CRA 2015 s.11** goods to match description

WHAT WE CHECK

Adverts and descriptions accurately state mileage, service history, previous keepers, write-off category, known faults and outstanding recalls.

CHECKPOINTS IN THE AUDIT

- **Q1** Are mileage, service history and keeper numbers verified before listing?
- **Q2** Are write-off categories and known faults disclosed?
- **Q3** Are descriptions checked against HPI/history reports?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

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BEYOND THE FINE

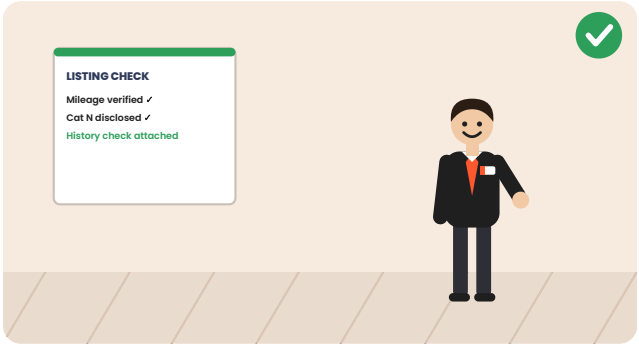
Trading Standards can also prosecute: unfair commercial practices are **criminal offences** with unlimited fines and up to 2 years in prison. Decisions are published.

REAL ENFORCEMENT

100

businesses in 14 sectors received CMA **enforcement or advisory letters** after its Nov 2025 online pricing sweep.

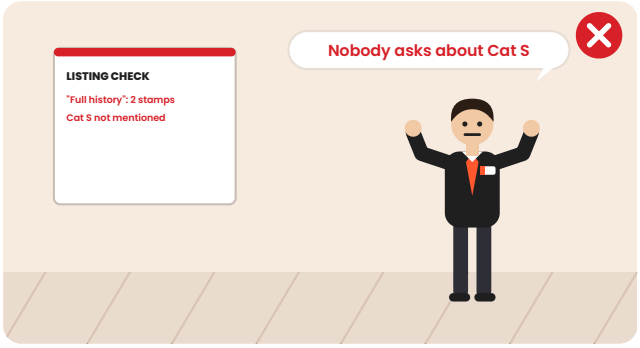
✔ RIGHT WAY



Verified details and write-off category disclosed.

✖ WRONG WAY

10% TURNOVER



"Full history" with two stamps, and Cat S hidden.

PURPOSE

An undisclosed write-off or false history is a misleading action and gives the customer the right to reject.

FIX IT WITHIN

72 hours

AUDIT CRITERIA · PASS WHEN

- History check for every car
- Write-off disclosed
- Mileage verified
- Faults declared

IDEAL WAY OF AUDITING

1. Sample 10 listings against history reports
2. Check service books
3. Check write-off markers

Evidence: History reports + listings.

WORST CASE A misleading description can bring a **CMA fine**, a **Trading Standards prosecution** and the car coming back.

CON-04 CONSUMER LAW · CMA · STANDARD 04 OF 06

Right to Reject & Repair Honoured

Area **Sales · Aftersales**

Person in charge **Sales Manager · Customer Relations**

Regulator **CMA · Trading Standards**

MAXIMUM PENALTY

10%

of global turnover · CMA direct fine

Or **£300,000** if higher · plus customer refunds

• CRITICAL

THE LAW

DMCCA

Digital Markets, Competition and Consumers Act 2024 (Part 4, in force 6 Apr 2025) · **Consumer Rights Act 2015** · **Consumer Rights Act 2015 s.9–24**: satisfactory quality, 30-day right to reject, repair or replace, final right to reject

WHAT WE CHECK

Faults reported within 30 days get a full refund if the customer wants one. After that, one repair or replacement, then a final right to reject. Faults in the first 6 months are presumed to have been there at sale.

CHECKPOINTS IN THE AUDIT

- **Q1** Are customers offered a refund for faults reported within 30 days?
- **Q2** Are faults within 6 months treated as present at sale unless proven otherwise?
- **Q3** Do staff never tell customers they bought "sold as seen" rights away?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

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BEYOND THE FINE

Trading Standards can also prosecute: unfair commercial practices are **criminal offences** with unlimited fines and up to 2 years in prison. Decisions are published.

REAL ENFORCEMENT

£5,700

Norwich dealer (Feb 2026) prosecuted for selling a **dangerous car** without proper checks: fine and costs.

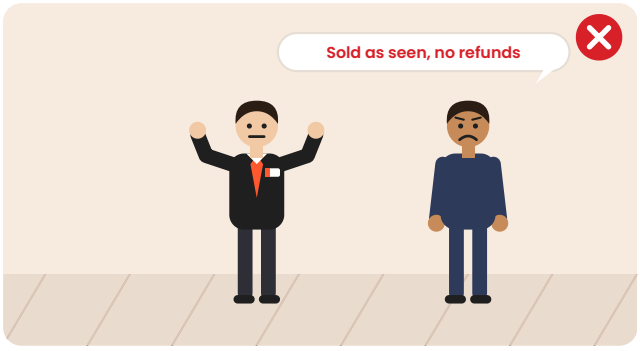
✔ RIGHT WAY



Refund offered within 30 days.

✖ WRONG WAY

10% TURNOVER



"Sold as seen" to a consumer.

PURPOSE

Statutory rights can't be signed away. Refusing them is one of the most common Trading Standards complaints.

FIX IT WITHIN

72 hours

AUDIT CRITERIA · PASS WHEN

- 30-day reject honoured
- 6-month presumption applied
- No "sold as seen" to consumers
- Staff trained

IDEAL WAY OF AUDITING

1. Review 5 recent fault complaints
2. Check sales documents for exclusions
3. Ask staff about the 30-day rule

Evidence: Complaint files + sales docs.

WORST CASE Refusing statutory rights leads to **court claims, Trading Standards action** and CMA scrutiny of the whole process.

CON-05 CONSUMER LAW · CMA · STANDARD 05 OF 06

Distance Sales: 14-Day Cancellation

Area **Online sales · Delivery** | Person in charge **Digital Sales Manager**

Regulator **CMA · Trading Standards**

MAXIMUM PENALTY

10%

of global turnover · CMA direct fine

Or **£300,000** if higher · plus customer refunds

• CRITICAL

THE LAW

DMCCA

Digital Markets, Competition and Consumers Act 2024 (Part 4, in force 6 Apr 2025) · **Consumer Rights Act 2015** · **Consumer Contracts Regulations 2013**: pre-contract information and 14-day cancellation for distance and off-premises sales

WHAT WE CHECK

Cars sold online, by phone or delivered to the customer come with the pre-contract information and a clear 14-day cancellation right, with refunds within 14 days.

CHECKPOINTS IN THE AUDIT

- **Q1** Is pre-contract information (including cancellation rights) given for distance sales?
- **Q2** Are cancellations within 14 days of delivery honoured, with refunds on time?
- **Q3** If cancellation info is missing, is the extended period (up to 12 months) recognised?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

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BEYOND THE FINE

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REAL ENFORCEMENT

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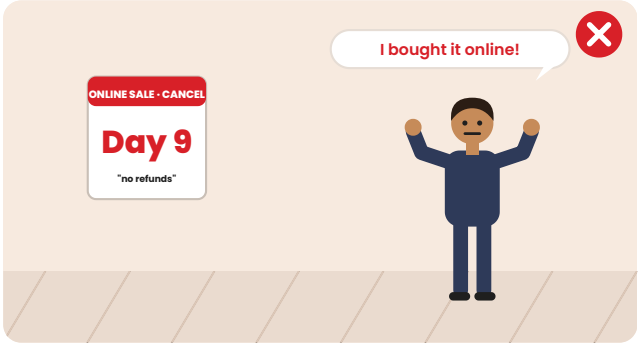
✔ RIGHT WAY



Cancellation on day 9, refunded.

✖ WRONG WAY

10% TURNOVER



Cancellation refused for an online sale.

PURPOSE

Online and click-and-collect sales are growing, and each one carries the 14-day right.

FIX IT WITHIN

7 days

AUDIT CRITERIA · PASS WHEN

- Pre-contract info sent
- 14-day cancellation honoured
- Refund within 14 days

IDEAL WAY OF AUDITING

1. Sample 5 distance sales
2. Check the information email
3. Check cancellation refunds

Evidence: Distance sale files.

WORST CASE Missing cancellation information extends the right to **12 months**: the customer can hand the car back for most of a year.

CON-06 CONSUMER LAW · CMA · STANDARD 06 OF 06

No Pressure Selling

Area **Sales** | Person in charge **Sales Manager** | Regulator **CMA · Trading Standards**

MAXIMUM PENALTY

10%

of global turnover · CMA direct fine

Or **£300,000** if higher · plus customer refunds

• CRITICAL

THE LAW

DMCCA

Digital Markets, Competition and Consumers Act 2024 (Part 4, in force 6 Apr 2025) · **Consumer Rights Act 2015** · **DMCCA s.227** aggressive practices · **Sch.20** false urgency and limited-time claims

WHAT WE CHECK

No fake deadlines, invented rival buyers, false stock claims or pressure tactics. Offers that say they end, really end.

CHECKPOINTS IN THE AUDIT

- **Q1** Are "today only" and deadline claims always genuine?
- **Q2** Are staff forbidden from inventing other buyers or false scarcity?
- **Q3** Is a customer never kept at the desk or denied time to think?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

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BEYOND THE FINE

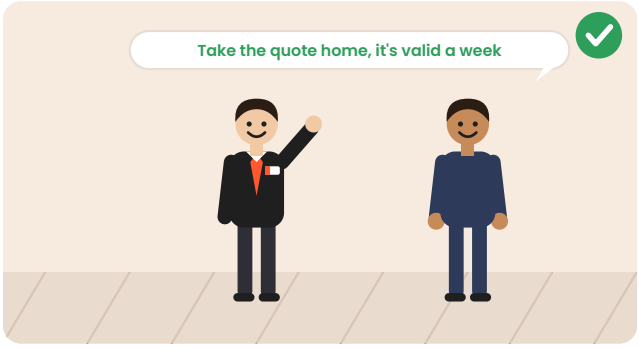
Trading Standards can also prosecute: unfair commercial practices are **criminal offences** with unlimited fines and up to 2 years in prison. Decisions are published.

REAL ENFORCEMENT

£720K

CMA fine on Marks Electrical (Jun 2026) for **automatic opt-in charges**, plus £600K in refunds.

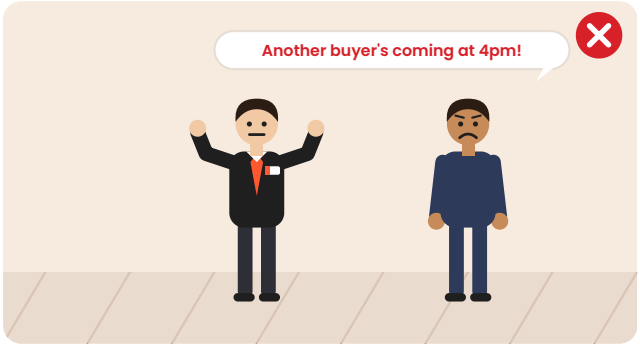
✔ RIGHT WAY



Quote valid for a week, no pressure.

✖ WRONG WAY

10% TURNOVER



Invented rival buyer to force a decision.

PURPOSE

Fake urgency is a banned practice. Countdown timers and "last one" claims are enforcement targets.

FIX IT WITHIN

72 hours

AUDIT CRITERIA · PASS WHEN

- Genuine deadlines only
- No invented buyers
- Customers given time
- Staff trained

IDEAL WAY OF AUDITING

1. Mystery-shop the showroom
2. Check website timers and banners
3. Review sales scripts

Evidence: Mystery shop + scripts.

WORST CASE An aggressive practice is both a **civil breach (10% turnover)** and a **criminal offence**.

FIX THE PRICE BEFORE THE CMA DOES

Your 30-day consumer action plan.

Today

- [ ] **CON-02** Honest Reviews
  Immediate

This week

- [ ] **CON-01** All-in Pricing, No Drip Fees
  72 hours
- [ ] **CON-03** Accurate Vehicle Descriptions
  72 hours
- [ ] **CON-04** Right to Reject & Repair Honoured
  72 hours
- [ ] **CON-06** No Pressure Selling
  72 hours
- [ ] **CON-05** Distance Sales: 14-Day Cancellation
  7 days

This month

Re-audit the site in 30 days.

?/6 Count your passes. A single hidden fee repeated on every sale is **one breach across every customer**.

SOURCES

- DLA Piper: The AA agrees a fine in the first CMA consumer enforcement under the DMCCA (Apr 2026) · dlapiper.com
- Winston Taylor: CMA consumer protection enforcement in 2026 · winstontaylor.com
- AM Online / Car Dealer Magazine: CMA probes Autotrader over reviews · am-online.com
- Car Dealer Magazine: rogue dealer fined for selling dangerous vehicle (Feb 2026) · cardealermagazine.co.uk
- DMCCA 2024; Consumer Rights Act 2015; Consumer Contracts Regulations 2013 · legislation.gov.uk

Disclaimer. For compliance-audit guidance only; not legal advice. Maximum penalties shown; actual fines depend on the breach. Check current CMA guidance.

AUDIT SIGN-OFF

DEALERSHIP / SITE	AUDITOR	DATE	SCORE __ / 6

BRANCH / DEALER PRINCIPAL SIGNATURE	COMPLIANCE LEAD SIGNATURE