Consumer Scotland
Luchd-Cleachdaidh Alba

Consultation Paper: Consumer Codes Review

Improving outcomes for consumers in Scotland

August 2026

Contents

1. Foreword

I am delighted to launch this consultation which considers how data and intelligence can support the work of the consumer sector in Scotland.

Consumer advice is a core part of Consumer Scotland's statutory remit, and central to our work to prevent harm, protect consumers and promote their participation in the economy.

The advice service, along with other elements of the consumer protection landscape in Scotland, is a publicly funded service. It is important that we work to continuously ensure the system is equipped to effectively protect and support consumers. Central to this work is the intelligence generated by the consumer, energy and post advice services delivered by Advice Direct Scotland (ADS) to around 50,000 consumers a year.

This data provides valuable insight into consumer issues and underpins advocacy and enforcement across the wider landscape, enabling consumer protection services, and policy and regulatory partners, to prevent consumer harm.

The devolution of advice has provided the opportunity to deliver services in a way that works for consumers in Scotland. People benefit from a range of services across the consumer sector that straddle devolved and reserved boundaries. Seeking the views of our partners across the landscape about how the advice codes can most effectively support the work of the sector, and take into account any factors specific to Scotland, will help us ensure the system delivers for consumers.

We welcome written responses and we will be organising stakeholder events during the consultation period. We look forward to receiving views from partners across the consumer sector, and beyond.

Sam Ghibaldan
Chief Executive
Consumer Scotland

2. Background

2.1 The consumer protection landscape in Scotland comprises a diverse range of functions delivered nationally and locally across devolved and reserved legislation. Collaborative working between landscape partners can ensure that consumer advice, advocacy and enforcement are tailored to the specific needs of Scottish consumers and markets.

2.2 The consumer sector is responsible for preventing harm to consumers through influencing decisions taken by the public and private sectors, protecting consumers from further harm they've experienced by providing expert advice and ensuring consumers can participate in markets and the economy by creating a compliant and supportive business environment. These responsibilities combined can help deliver the national priority of strengthened economic growth.

2.3 The advice service is a critical underpinning pillar that helps achieve these strategic objectives by providing data and intelligence to inform the work of advocacy and enforcement partners.

2.4 Funded by Consumer Scotland, Advice Direct Scotland (ADS) delivers national consumer and energy advice services across Scotland, supporting consumers on a wide range of consumer protection, energy affordability and energy market issues. Through these services, ADS provides information, advice, advocacy and referrals to specialist organisations where additional support or regulatory intervention is required.

2.5 During the period 1 June 2025 to 31 May 2026, ADS handled around 50,000 advice contacts across its consumer, energy and post advice services.

2.6 Alongside direct consumer support, ADS generates a substantial evidence base through structured case coding and detailed adviser records. This intelligence enables the identification of emerging consumer harms, market trends and vulnerability patterns, while supporting operational delivery, policy development and collaboration with regulators, government and other partner organisations.

2.7 This consultation is on the data shared from ADS advice services with partners across the consumer protection landscape, and complements a similar exercise being carried out across GB by Citizen's Advice (CiTA). Both consultations focus primarily on the coded data shared with partners. For partners in Scotland who access advice data from both CitA and ADS, feedback and comments on the CitA structures should be directed to the CitA led consultation.

2.8 While coding structures are only one part of the intelligence shared by advice services, they are integral to the work of partners by generating high level understanding of issues and trends. At the same time, the insight generated by analysis of coded data is only as good as the quality of data recorded, which can be hindered by an overly complex code structure. The usability of the structure for both stakeholders and advisers will form a key part of this consultation that will deliver proportionate findings following its evidence-led approach

2.9 It is important to review whether advice service outputs and the current coding structure fully meets the needs of the partners on a continuous basis. Regular reviewing of the coding structure ensures that elements don't become outdated, it fully reflects the needs of the landscape and the advisers that use it, and it avoids bringing detriment to desired outcomes.

2.10 Funded by the Department for Business, Innovation, Science and Trade (DBIST – formerly Department for Business and Trade), this project is being delivered in partnership between CiTA and Consumer Scotland. While the project principles will be aligned across Great Britain, Consumer Scotland is leading engagement activity with partners in Scotland through a Scotland specific consultation. A separate consultation paper, which reflects coding structures and data of the consumer service run by CiTA, can be found here.

2.11 Consumer Scotland will continue to work with all partners and stakeholders including those who access CiTA's data, to ensure we understand their needs and reflect these through the delivery of the Consumer Codes review.

3. Consumer Codes

3.1 All consumer service client contacts are recorded using a set of pre-defined codes which categorise issues according to the type of goods or service, method of sale, complaint type and many more. This provides consistency of case classification and data across the breadth of partner organisations where it can be deployed to inform meaningful trend analysis and threat identification.

3.2 A previous codes review project took place in 2015 covering all of GB. No changes have been made to the codes used in England and Wales since then. In Scotland, ADS launched a new consumer advice service in 2019, and have evolved the code structure in Scotland over time. It now differs in a way that means that codes between Scotland and England and Wales are no longer directly comparable.

3.3 As in England and Wales, there is an opportunity to review the effectiveness of Scotland's coding structure through a consideration of whether new products, services and issues are appropriately represented in existing structures and whether the structure continues to meet the needs of landscape partners. The review of the Scottish structure will take place at the same time as the review in England and Wales to ensure that lessons from the two systems can be considered, and to allow stakeholders to consider the relative importance of GB-wide consistency and national flexibility.

3.4 While the codes are generated within consumeradvice.scot, it is for partners to then use the data accordingly to help shape their work and determine the outcomes it can bring for consumers. Meaningful and thorough engagement with stakeholders can help ensure that any changes to the coding structure meets their needs, both now and in the future.

3.5 A consultative approach helps place the lived experience of Scottish consumers and distinct data needs of our partners at the heart of the design process. Only by understanding how different roles and teams within organisations each manipulate the codes to meet their varied objectives can the advice service deliver a service that effectively underpins intelligence analysis and the wider work of the landscape.

3.6 The consumer codes project contains three sequential elements

- **Listen** - Understand the needs of the GB consumer protection community, in terms of the data we collect in Scotland and how it is made available to partners
- **Design** - Collate and analyse these needs, build consensus, and design a viable code set that reflects the range of needs as fully as possible
- **Implement** - Test and initiate the use of these codes, both across our own internal systems and those of our partners

4. Consultation Scope and Methodology

4.1 Separate but complimentary consultations have been developed in partnership between CitA and Consumer Scotland, to appropriately reflect differences between the advice landscapes. Results will be analysed both separately and holistically to ensure that Scottish specific differences are appropriately considered as part of the wider evidence base. Both consultations use the same basic structure and broadly similar questions, framed and worded appropriately to reflect the differences between nations. There are some additional questions in the Scottish consultation to capture feedback on qualitative as well as coded data, and to test whether consistency in coding between Scotland and England and Wales is required by partners.

4.2 In carrying out this consultation Citizens Advice and Consumer Scotland will be seeking to engage with more than 200 separate organisations, each with their own drivers, needs and requirements, and capturing their responses to ensure we have a full range of evidence to shape decision making.

4.3 We will develop a framework to gather consistent information from all partners, to help provide singular points of reference and meaningful comparisons. This will be augmented with relevant contemporaneous feedback we receive during our engagement activity, to ensure we have the fullest picture at our disposal.

4.4 We will be seeking knowledge, experience and informed subjectivity from partners on the data that is shared with them. This will include identifying:

- missing codes - such as Electric Vehicles or Vapes
- redundant codes - either through lack of use or a lack of relevance to consumer and partner needs
- potential issues with the location of codes - for example a previous decision to move Doorstep crime to a method of sale / purchase type from complaint type
- additional codes to tag overarching trend types that span multiple code sets, and implemented in Scotland via secondary coding, e.g. Scam
- positive and negative impacts of the decision to take a different approach to code structures in Scotland, e.g. multiple secondary coding instead of two complaint categories, and differences in the code options available to advisers
- additional data that could be collected and shared to enhance outputs for partners, balancing this against the constraints of the project, the scope of the adviser's role and the technical viability

- how holistic analysis of coded and qualitative intelligence can support partners' work

4.5 It is important to note that this is not a 'blank sheet' exercise; we are starting with the existing data sets as a foundation. Reasons for this include to:

- ensure continuity for legacy reporting
- maintain broad parameters of scale - with an awareness that with too many codes, the level of granularity becomes too focused, whilst too few negatively impacts analysis and comparison
- reflect initial assessments and anecdotal feedback from partners and advisers that portions of the existing code set and approaches work in line with requirements
- strike a balance between the needs of the consumer protection landscape and their use by advisers in a consistent way - too many codes and they are cumbersome to navigate, diluting data quality and making the results of analysis less meaningful, too few becomes impractical and unreflective of the cases they advise on
- mitigate the impact on data collection for advisers, which may not all be directly relevant to the advice being provided
- ensure the aims and objectives of the consultation are manageable within the parameters of the project and funding envelope

4.6 However, this is not a dilution of ambition. We are committed to an extensive augmentation of the current structure where the evidence we gather demonstrates that this is needed.

4.7 When responding to this consultation, we would also encourage partners to consider the benefits of analytical approaches that do not make use of code structures, and focus instead on analysis of the qualitative intelligence in case notes.

4.8 Reflecting that quantitative and qualitative approaches are complimentary, our overarching ambition is to develop a coding and data sharing structure for Scotland that can support both in a practical way.

4.9 In addition to consideration of the code structure, we therefore also seek views on the extent to which the holistic package of information shared from the consumeradvice.scot service with partners supports meaningful analysis in both Scottish specific and cross-border contexts.

4.10 The current coding structures used in Scotland and England and Wales also have significant differences. As a smaller nation with a correspondingly smaller advice case load, and with unique issues, it may not be appropriate for Scotland to have identical structures and granularity as England and Wales. We therefore also seek views on how beneficial it is to be able to compare directly between nations, and the level of comparability that is required to do this in an effective but proportionate manner.

4.11 It should be also noted that redesigning existing partner referral pathways, or changes to external partner systems beyond enabling integration with the new coding structure/API, are not within the scope of the project.

5. Engagement Methodology

5.1 To ensure a comprehensive and representative understanding of the consumer protection landscape's needs, our consultation methodology is designed for reach and accessibility.

5.2 The primary methodology is to gather partner views through written responses to this consultation paper, which should be submitted via email. Parallel to this we will also conduct awareness raising of the consultation and engage stakeholders either online or in person in the following ways:

- Awareness raising webinar(s)
- Participation in established forums and working groups convened by partners or ourselves
- Direct bilateral meetings by arrangement

We will work collaboratively with Citizens Advice on consultation engagement where appropriate to minimise impact on partners that use both code structures.

5.3 Partner engagement will supplement formal consultation responses to inform a rigorous, evidence-based analysis of why specific changes are requested. Through this, we will be better positioned to assess the operational realities, funding constraints, and strategic priorities that make specific data points necessary, balancing this against advice service operational needs. This will provide a platform to address systemic intelligence gaps, ensuring the final codes are not just technically sound, but practically useful and strategically valuable. This in turn, will help partners better achieve their objectives, proactively preventing harms to consumers more effectively.

5.4 Finally, we recognise that consensus building is essential as not every suggestion or request can be adopted. Our decision-making process will be guided by robust principles - understanding, trust, transparency, and objectivity - to formulate a response that represents the greatest good and delivers the most beneficial impacts for the landscape as a whole. We will analyse responses to the consultation fully, identifying alignment and coalescing around areas of divergence to mediate solutions that offer the greatest benefit.

6. Consultation Outputs

6.1 The timeline for the consultation, at the time of publication, are as follows:

Activity	Completion timeframe
Consultation closes	October 2026
Response analysis	November 2026
Recommendation collation	November / December 2026
Consultation response drafting	December 2026
Consultation response publication	January 2027

6.2 Our approach to assessing responses and developing recommendations will focus on four key themes:

- **Strategic value** - How strongly does the change align with the strategic priorities of the consumer landscape in Scotland, coupled with those of the consumer service's objectives and priorities?
- **Partner impact** - what is the likely beneficial impact of the changes, across multiple user groups and beneficiaries? Where change may have lower levels of benefit to certain organisations or functions, is there clear and objective evidence this is significantly outweighed by the greater good for the landscape?
- **Technical viability** - What is the likely effort and complexity of development and implementation, at both an adviser and partner level?
- **Consensus level** - how strongly aligned are opinions across the responses received against the proposed change?

6.3 This will create a matrix that will evidence the case for change for each area, as outlined below, along with supporting evidence and narrative to provide fully transparent decision making.

Example change	Strategic Value	Partner Impact	Tech viability	Consensus
Example: Electric Vehicle Code	*High*	*Low*	*High*	*High*
Example: New data field	*High*	*High*	*Medium*	*Medium*

7. How to respond to this consultation

7.1 Whilst Consumer Scotland and Citizens Advice will undertake engagement activity with partners, advisers and other stakeholders, weight will be given to written responses to this paper, and they will help inform our decision making in a user oriented way.

7.2 **Responses, once completed, should be submitted via email no later than Friday 30 October 2026 to consumercodesreview@consumer.scot**

7.3 Guidance on completing this consultation is provided below for reference:

- Please only respond to the questions that are relevant to your work, and/or those that you have views on. There is no requirement to complete each question.
- To support this approach, the document has a number of links within it, to ease navigation between sections.
- A full list of existing codes can be found in Appendix B, for full review and reference together with detailed analysis of code usage, which this paper draws on.
- Where possible, please provide clear insights into the impact to your work of any current issues with the current coding structure, or any potential or suggested solutions. Whilst we make every effort to understand how each partner works with advice data in broad terms, you are the experts in your fields and the more we understand about these impacts, the better informed our decision making can become.
- Where you have evidence to support your suggestions, please submit a summary of this as part of your response - this could be statistical, case studies or similar. Whilst anecdotal or discursive evidence you have submitted in other engagement forums we attend will be fully considered, it can also be reflected in your responses where relevant
- We would ask that responses to individual questions are limited to **1,000 words** (with the exception of **question 29 where the limit is 1,500**). This ensures analysis of these across every submission can be focused and meaningful
- Only one submission should be submitted per organisation. Different teams or departments may of course collaborate on answering questions to ensure the widest expertise and experience is included.

8. Current Codes Usage

8.1 Following rationalisation work undertaken by Advice Direct Scotland (ADS), the current code structure for the consumeradvice.scot service is made up of around 500 in-scope codes comprised of consumer product and services, secondary coding, criminal concern type, payment method and purchase method fields and specific codes for energy and post advice services. This structure is designed to allow advisers to collect relevant information from their targeted questioning to provide relevant and accurate advice, whilst also providing data to partners and the key aspects of the issue, report or dispute.

8.2 Advisers apply their judgement when applying codes, based on the nature of the information provided to them, and the coding structure available. All are trained on the use of codes and the importance of accuracy, particularly given the wider use of the data across the consumer protection landscape. The search functionalities on the consumer service systems are intuitive and built with user involvement. Advisers defer to the person contacting the service on any data fields that are subjective in nature and will not apply judgement - for example monetary values. Where a suitable code is not available, advisers will make use of an 'other' code if available, or use their judgement based on the information provided. All quality review processes undertaken by Advice Direct Scotland include confirmation of data and coding accuracy.

8.3 Some codes are mandatory for advisers to collect on each case. Others are mandatory only for certain case sub-types, or only collected when relevant. Not all fields are shared with partners either. Some of the binary fields or short, fixed lists are primarily designed to support consistent advice delivery by prompting advisers to capture key information, follow appropriate referral pathways and ensure advice is provided on the correct basis. While it may be possible to share some of these fields more widely in future, this would need to be considered in light of operational need, partner requirements, and the value they would provide for consumer protection activities.

8.4 There are substantial differences in approach to coding between that taken by ADS and CiTA . The CiTA structure consists of around twice the number of codes, therefore providing more granularity.

8.5 There is a balance to be struck between granularity and simplicity. While granularity offers more visibility, particularly of less common issues, codes structures must also be operationally usable by advisors. Advisors work in time-sensitive environments and granularity can also increase complexity, reduce consistency of coding decisions and place additional pressure on staff, reducing quality of data input. Given that an advisor's primary responsibility is to provide an effective advice service, in an overly complex coding structure there is a greater risk of advisors selecting select broader categories, such as "other", to main the flow of the conversation without compromising the quality of support provided. Analysis of data is only ever as good as the data itself, and an overly complex structure that is not operationally usable risks reducing the quality of analytical findings.

8.6 Scotland is also a smaller nation than England and Wales, resulting in a smaller overall number of advice cases. It therefore may not be proportionate for Scotland to have identical levels of granularity in coding as in England and Wales where even the least used codes are still applicable to hundreds of cases a year. Imposing the same data structures on Scotland as are used in England and Wales could increase complexity with associated risks to data quality, with little or no observed benefit to trend analysis due to the small absolute number of advice cases that will use some of the codes.

8.7 While being able to directly compare Scottish consumer trends with England and Wales is beneficial, there may also be rationale for Scotland to have unique options that reflect distinct Scottish differences in the consumer experience. We are therefore including a question on the relative priority partners place on comparability across nations, and what this should look like.

8.8 Although the primary focus of this consultation is on code structures, analysis supported by these is not the only type of analysis that can be conducted by partners who can also access free text advisor case notes.

8.9 The combination of qualitative and quantitative analysis provides compelling evidence of emerging consumer harms, consumer needs and market developments. We would encourage partners to consider the potential use of qualitative intelligence analysis alongside analysis of coded data when assessing current and future data needs, and have included a question to understand the extent to which partners make use of more qualitative approaches and any challenges they face.

8.10 The complete list of the existing codes covered in this consultation can be found in Appendix B for reference when considering and submitting responses to this consultation.

8.11 The code sub-sets that are in scope for review are as below, with a table for consumer issues, energy and then post coding:

Consumer

Code sub-set	Description	Example
Product or Service	The type of product or service the contact relates to. There are three code tiers - a tier one group descriptor and then a tier 2 code for the actual goods or services. The codes are accompanied by separate Flare codings that map to the tier 3 code	Home improvements (tier 1) Home maintenance and improvements (tier 2) Roofing work (tier 3) AB25 (Flare code)

	There is a specific code included for to note Scams	
Criminal Concern Type	The type of criminality that an advisor has concerns may have taken place based on information provided by the consumer A single tier code with 7 options	Misleading Omission Unsafe Services Underage Sales
Secondary coding (previously complaint type)	A field unique to Scotland which contains a high level assessment of the nature of the issue raised by the consumer and / or the application of an overarching code flag. A single tier code with 20 options. The specific subset available is dependent on the selected product or service. There is no limit on how many secondary codes can be added	Substandard quality Safety issues Pressure selling Scam
Purchase Method	Where or how the contract between the consumer and trader took place. A single tier code	Trader premises Trader website
Payment method	How the contract was paid, or payment was requested by the trader. Includes a code for 'Not paid'. A single tier code.	Debit Card PCP
Value spent	The value of the contract between the consumer and trader. Note as per the 'Payment Method' note above this may not yet have been paid in some circumstances.	£300
Value paid to date	The amount that the consumer has paid out so far. This can be the same amount as in value spent, but can also be less where only interim payments have been made	£150
Purchase date	The date the contract was agreed, paid or incident took place, depending on the case circumstances	01/01/2026

Detriment value (Mandatory)	A code that seeks to differentiate between contract value and consumer detriment. A single tier code sub-set, which captures the value of the detriment. This could be the same as the contract value or a higher or lower amount depending on circumstances	£250

Energy and Post (captured in a single database)

Code sub-set	Description	Example
Customer type	The type of customer the case relates to	Consumer Heat Network Microbusiness
Supply type	The type(s) of energy supplied to the address. A single tier code set	Duel fuel
Energy Codes and Post Codes	The nature of the issue raised by the consumer - what went wrong between them and the supplier, or the nature of the offence they are seeking to report. There are two code tiers - a tier one group descriptor and then a tier 2 code for the actual complaint type. Advisers are able to currently add a single code to an advice case. Energy codes map directly to those used by the consumer service in England and Wales	BE - Billing error BE21 - Failure to credit / refund MC – mail collection 02 – collection problems
Have you contacted the supplier	Confirmation of whether the supplier has already been contacted to raise the issue or complaint directly with them in the first instance, ensuring appropriate advice and referrals are not sent prematurely. A binary choice of Yes or No.	Yes

Off supply (EHU only)	Confirmation of whether there is a current interruption to energy supply A binary choice of Yes or No.	No
Energy Payment Type	Whether the customer pays by credit or PPM A binary choice of Credit or PPM	Credit
Energy Payment Method	Payment method used by the customer A single tier code	Weekly Cash
Illness / Disability	Confirmation of whether there are any elements of the contact that meet the definition for additional referrals or support, such as the Extra Help Unit. A binary choice of Yes or No.	No
Energy Codes and Post Codes	The nature of the issue raised by the consumer - what went wrong between them and the supplier, or the nature of the offence they are seeking to report. There are two code tiers - a tier one group descriptor and then a tier 2 code for the actual complaint type. Advisers are able to currently add a single code to an advice case. Energy codes map directly to those used by the consumer service in England and Wales	BE - Billing error BE21 - Failure to credit / refund MC – mail collection 02 – collection problems
Have you contacted the supplier	Confirmation of whether the supplier has already been contacted to raise the issue or complaint directly with them in the first instance, ensuring appropriate advice and referrals are not sent prematurely. A binary choice of Yes or No.	Yes
Off supply (EHU only)	Confirmation of whether there is a current interruption to energy supply A binary choice of Yes or No.	No

Energy Payment Type	Whether the customer pays by credit or PPM A binary choice of Credit or PPM	Credit
Energy Payment Method	Payment method used by the customer A single tier code	Weekly Cash
Illness / Disability	Confirmation of whether there are any elements of the contact that meet the definition for additional referrals or support, such as the Extra Help Unit. A binary choice of Yes or No.	No

8.12 It should be noted that whilst energy and post codes are in scope for the review, the nature of data sharing arrangements means these have been able to be reviewed periodically. As such it may not be necessary to make changes on the same scale as for consumer issues.

8.13 Further, we recognise the consumer protection landscape, in the intelligence-led environment that its constituent parts operate in, may advocate for filling wider gaps in the types of data the respective advice services are able to collect and share. Whilst it will not be possible to meet all these requirements, the consultation will seek to draw out these needs and suggestions and apply them alongside the above list.

8.14 The coding structures used in Scotland for consumer, energy and post services have developed to reflect the distinct legislative, policy and operational environment in Scotland and support Scottish specific reporting and service delivery requirements. This means that the coding structures in Scotland are different from those used in England and Wales.

8.15 There is value in enabling appropriate comparison of data across the UK. We recognise, however, that there competing approaches to achieve this, with pros and cons for each. Comparison could be achieved through the creation of a single shared coding structure across the UK, or through taking a more nation specific approach that allows each service to retain a unique and more flexible structure, but with an agreed mapping that supports interoperability and comparability.

8.16 The consultation therefore seeks to gather evidence on the extent to which partners value comparability between nations, and how partners believe this should be achieved. CitA and ADS structures are currently different in relation to fields and code lists. In order to help partners assess what best meets their needs, current differences between the two structures are detailed below. Where there are no significant differences, fields are not listed in the below tables. Partners should also note that these tables reflect current data structures only. They do not purport to represent future structures as these may change in response to consultation feedback.

Current structural differences between nations

Consumer

Field	ADS consumeradvice.scot	CitA Consumer Service
Product or Service	254 options in three tiers, e.g. Home Improvements – Energy and Heating – Fire Surrounds 62 codes were used on ten occasions or less during the period of analysis	490 options in three tiers, e.g. House Fittings and Appliances – Energy and Heating – Fireplaces and Hearths 19 codes were used on ten occasions or less during the period of analysis
Secondary Coding (used from July 2025 onwards)	21 options in a single tier – the specific subset available depends on the product or service, e.g. Substandard quality Pressure selling 1 code (product recall) was used on ten occasions or less during the period of analysis	89 options in two tiers, e.g. Selling practices – Nuisance / cold calling 4 codes were used on ten occasions or less during the period of analysis
Complaint Category (used prior to July 2025)	25 options – not forming part of this consultation as no longer used	
Criminal Concern	7 options in a single tier, e.g. misleading omission 1 code (Failure to honour cooling off period rights) was used on less than 10 occasions during the period of analysis	Not included
Payment Method	16 options	29 options in one tier including options not used in Scotland such as Banker's draft and CHAPS payments Premium rate calls

Purchase Method	14 options	28 options in one tier including options not used in Scotland such as Internet auction Franchise or chain garage (for vehicles)
Pre contract cancellation rights	Not included	Mandatory confirmation of whether pre-contract cancellation information was provided to the consumer by the trader based on their circumstances A choice of Yes, No or N/A
Alternative Dispute Resolution	Not included	Mandatory confirmation of whether Alternative Dispute Resolution advice was offered to the client A binary choice of Yes or No
Scam / Rogue Trader	Captured as a product or service code and as an option in secondary coding	Mandatory overarching code for all consumer cases which can be applied in addition to the complaint type and acts as a flag for this type of issue A binary choice of Yes or No
Detriment Type	Not included	Mandatory overarching code that differentiates between contract value consumer detriment. A single tier code subset which captures the nature of the detriment, for example out of pocket expenses inconvenience The consultation later sets out challenges experienced in England and Wales in relation to this field

Energy

Field	ADS energyadvice.scot	CitA Consumer Service
Responsibility for account	Not used	Confirmation the account holder is the person contacting the service, or that they have appropriate permissions to do so. A

		single tier code set, for example: Responsible for account
Energy supply address type	Covered by customer type	The type of address served by the energy supplier - domestic or business. A single tier code set, for example: Micro business
Smart Meter	Not used	Confirmation of whether the address has a smart meter installed. A binary choice of Yes or No.
Method of Sale	Not used	Where or how the contract between the consumer and supplier was formed took place. A single tier code, for example: CDD - Direct Debit
Date of contact	Not used	If the supplier has been contacted about the issue, the date this took place
Detriment type	Not used	Added in 2015 to seek to differentiate between contract value and consumer detriment. A single tier code sub-set, which captures the nature of the detriment, for example: Out of pocket expenses Inconvenience
Detriment vale	Not used	Added in 2015 to seek to differentiate between contract value and consumer detriment. A single tier code sub-set, which captures the value of the detriment, for example: £250
Responsibility for account	Not used	Confirmation the account holder is the person contacting the service, or that they have appropriate permissions to do so. A single tier code set, for example: Responsible for account

Energy supply address type	Covered by customer type	The type of address served by the energy supplier - domestic or business. A single tier code set, for example: Micro business

Post

Field	ADS postaladvice.scot	CitA Consumer Service
Responsibility for sending / postal address	Not used	Confirmation the account holder is the person contacting the service, or that they have appropriate permissions to do so. A single tier code set, for example Responsible for account
Postal served address type	Covered by Customer type	The type of address served - domestic or business. A single tier code set, for example Micro business
Product	Not used	The type of postal service or product that the contact relates to. There are two code tiers – a tier 1 group descriptor and a tier 2 code for the actual product type for example RM – Royal Mail RMRAR – PO Box
Detriment type	Not used	Added in 2015 to seek to differentiate between contract value and consumer detriment. A single tier code sub-set, which captures the nature of the detriment, for example Out of pocket expenses Inconvenience

Detriment vale	Not used	Added in 2015 to seek to differentiate between contract value and consumer detriment. A single tier code sub-set, which captures the value of the detriment, for example £250
Mail content	Not used	A free text field recording a description of the item(s) sent by mail, for example letter
Mail contents value	Not used	Value of mail contents, estimated and supplied by the person contacting the service, for example £30
Date posted	Not used	The date the mail was sent
Cost of service	Not used	The amount agreed and / or paid for the service to the postal services provider, e.g. £10
Service start / end date	Not used	The date the service commenced and was due to or expected to conclude
Date of contact	Not used	If the supplier has been contacted about the issue, the date this took place

Consumer Data Structure Overarching Consultation Questions

Question 1 - How well does the current Scottish code structure enable you to fulfil your responsibilities and obligations within the consumer protection landscape?

Question 2 - Are there any elements of the current Scottish code structure that are essential to your work, and in your view should not be altered? In your response please consider any differences between the Scottish and English / Welsh structures.

Question 3 - Which of your organisation's strategic or operational priorities could this review project positively impact or contribute towards?

Question 4 - Balancing the needs of the consumer landscape against the needs of operational requirements for a coding structure, would you agree the current breadth and depth of Scottish coding is broadly correct. If not, how might changes provide more value to your work?

Question 5 – How valuable is it for your organisation to be able to conduct cross-border analysis to compare Scottish issues against GB? If this is valuable, what level of comparability is needed to facilitate this, e.g. identical structure, agreed mapping, or another solution?

Question 6 – to what extent does your organisation make use of the qualitative data shared by ADS in free text advisor case notes? Do you experience any challenges or barriers in conducting analysis using these notes?

9. Consumer Codes

9.1 The consultation sets out evidence relating to current code sub-sets individually (or in the case of smaller sub-sets, grouped in a logical way) over the next several pages. The full analysis supporting this can be found in Appendix B. This will outline how they are currently used across advice services in Scotland.

Product and Service

9.2 The product and service codes for consumer issues are by far the largest code sub-set. There are just over 250 individual tier 3 codes, reflecting the breadth of products that consumers engage in their day-to-day lives.

9.3 The breakdown of the tier 1 categories for Product and Service is as below - which reflects the trends services see in terms of the most common issues consumers seek advice about.

Product and Service – tier 1 **(tier 2 options listed below)**	**% of total cases (c. 25,380 cases June 2025 to May 2026)**
Vehicles (Boats, caravans, trailers; Other motoring costs; Vehicle fuel and charging stations; Vehicles)	24.48%
Home Improvements (Energy and heating; Floor coverings; Gardening products and services; Glazing products and installations; Home maintenance and home improvements; Other household goods and services)	19.08%
Retail (Betting, competitions, prize draws and business guides; Clothing and footwear; Domestic appliances and repairs; Florists; Gardening products and services; Other household goods and services; Other personal goods and services; Other recreational products; Photography; Sports and hobby equipment and services; Timepieces, jewelry and ornaments; Toiletries, perfumes, beauty treatments and hairdressing; Toys and games)	9.27%
Other (Freight; Other)	6.99%
Furniture (Furniture; Textiles and soft furnishings)	5.77%

Travel (Bicycles, repairs and accessories; Boats, caravans, camping and park homes; Holidays and accommodation; Other motoring costs; Transport)	4.65%
White Goods (Domestic appliances and repairs; Other household goods and services)	3.31%
Communication (Ancillary communication / technology services; Media devices, accessories and repairs; Telecommunications)	3.15%
Energy and Heating (Domestic fuel and water; Energy and heating)	2.90%
Money and Banking (Banking and credit; Charities; Insurance; Other personal goods and services; Professional and legal services)	2.79%
Media (Ancillary communication / technology services; Books, newspapers and magazines; Digital / media content; Industrial / commercial goods and services; Media devices, accessories and repairs; Telecommunications)	2.55%
Personal Care (Food and drink; Toiletries, perfumes, beauty treatments and hairdressing)	1.76%
Scams (Scams)	1.69%
Food and Drink (Food and drink)	1.67%
Property (Estate, letting agents, landlords and property management; Freight; Professional and legal services; Property purchase)	1.50%
Health (Disability aids; Medical goods and services)	1.44%
Entertainment (Culture and entertainment; Sports and hobby equipment and services)	1.07%
Animals (Industrial / commercial goods and services; Pets and veterinarian products / services)	0.98%
Hospitality (Catering and accommodation)	0.90%
Smoking (Tobacco and related products)	0.84%
DIY	0.60%

(DIY products; Other household goods and services)	
Education and Training (Education, employment and training)	0.54%
Professional Services (Industrial / commercial goods and services; Other household goods and services; Professional and legal services)	0.53%
Delivery Charges (Delivery charges)	0.46%
Children (Food and drink; Nursery goods and services; Sports and hobby equipment and services)	0.39%
Household Services (Other household goods and services)	0.37%
Weddings (Culture and entertainment; Photography)	0.25%
Funeral (Professional and legal services)	0.09%
Total	**100.00%**

9.4 Within this, there are a number of tier 3 codes that receive significant levels of use, for example:

- Over 3,800 cases for Used Cars – around 15% of all cases
- Over 1,000 cases for clothing and accessories – around 4% of all cases

9.5 Equally, there are a significant number of codes (58 - or around 23% of the total number of codes in this sub-set) where their individual total use within a 12 month period is below 10 cases. Cumulatively, these codes account for around 1% of all advice cases and include Children - Food and Drink - Baby Food and Milk (Flare Code CL10), Money and Banking – Banking and Credit - Pawnbrokers and Buy Back Services (DB10), Professional Services – Other household goods and services - Chimney Sweep (BP08) and Retail – Toys and Games – Hoverboard (FM99).

9.6 There is a significant use of “other”, which is the second highest code used at over 1,600 individual cases, 6.6% of the total.

9.7 There are a number of potentially useful missing codes, for example electric vehicles and vapes which have different consumer issues from the more traditional products in their respective categories. We also anticipate responses to this consultation may highlight other emerging products or services that would also need to be incorporated into the code sets where the benefit of inclusion is clear.

9.8 Consideration might also need to be given to smart devices, and whether each needs an individual code (i.e. Smart fridge/freezer), or a smart tick-box or similar that defines the goods as connected to the internet and/or voice activated as a modifier to an existing code.

Product and Service Type Consultation Questions

Question 7 - Based on the existing Scottish code sub-set, are there specific Product and Service codes that are no longer useful or provide little to no value for your work (which could be merged or removed)?

Question 8 - Are there any Product or Service codes that are missing and should be added to capture emerging issues or existing consumer behaviours more accurately?

Question 9 - Do the tier 1 and tier 2 code headings still reflect modern consumer behaviour. Is there a need for these to be redefined or reorganised to support your work more effectively?

Criminal Concern Type

9.9 Criminal Concern Type is a field shared with partners in Scotland that is not replicated in the data shared by Citizens Advice. The field allows advisors to select a criminal concern from a list of options which flags to Trading Standards partners the criminality that is believed linked to an advice case.

9.10 A second field titled Breach of Legislation offers a binary choice of Yes / No where advisers record if they believe that a breach of legislation has occurred. Given that a breach of legislation is not necessarily criminal, use of the Breach of Legislation and Criminal Concern Type fields do not consistently match.

9.11 Between June 2025 and May 2026, the code structure was added to around 3% of all advice cases.

9.12 The code structure is a single tier list, from which advisors can select a single option.

9.13 The breakdown of the categories is as below:

Criminal Concern Type	% of cases with a criminal concern type recorded (c. 735 between June 2025 and May 2026)
Misleading Omission (CPR)	33.79%
Misleading Advertising (CPR)	21.93%
Safety Defective Goods (CPA 1987)	21.12%
Unsafe Services	16.08%
Underage Sales	4.90%
Failure to Provide PCI/ Cance Rights	1.63%

Failure to honour cooling off period rights (CPR)	0.54%

9.14 Trading Standards partners enforce a significant amount of legislation that goes beyond the criminal offences included in this field.

9.15 While it will not be proportionate to include a code for every potential criminal concern enforced by Trading Standards, partners may feel that they would benefit from more granularity to this list. For example, they may consider the list should be expanded to include more of the specific banned practices under the Digital Markets, Competition and Consumers Act 2024, or to include practices considered to be unfair if they are likely to cause the average consumer to take a transactional decision they would not have otherwise taken, such as aggressive practices.

9.16 Alternatively, partners may feel that an accurate assessment of whether an issue is a contravention of law can only be made following a thorough analysis of information contained within the case notes, or even only possible once follow up enquiries have been made, and therefore that expanding the coding structure, particularly significantly, would not be appropriate. Partners should also consider the potential for confusion to arise if this field is coded incorrectly, which may be more likely to occur if the code list is expanded significantly.

Criminal Concern Type Consultation Question

Question 10 – Are the Scottish Criminal Concern Type codes effective for your organisation's needs? Are there any that should be added, removed or amended to accurately capture unfair or otherwise problematic practices that are covered by consumer rights legislation?

Secondary Coding (Complaint Type)

9.17 Secondary coding was introduced by Advice Direct Scotland in July 2025 to replace previous fields that captured up to two Complaint Types.

9.18 Secondary coding is a single tier sub-set that primarily captures the nature of the issue the consumer is reporting or seeking advice on. It reflects the information that the consumer provides and is not a judgement by the adviser of the merits or otherwise of any offence or problem.

9.19 There is a list of 21 secondary codes in the Scottish structure, with advisors selecting which to add from a sub-set of options. The specific sub-set available to advisors depends on the option chosen for Product or Service.

9.20 Advisors are not limited in the number of secondary codes they can add to a case, and selecting a secondary code is not mandatory. Since August 2025, secondary codes have been applied to around 60% of all advice cases. Of the cases where secondary codes are used, under 2% have three or more applied, and around 11% have at least two applied. The maximum number of secondary codes applied during the period of analysis is six.

9.21 As secondary codes are not limited to complaint categories, they can be used to flag issues for monitoring, for example third party intermediary / broker or subscription. This flexibility to add bespoke secondary codes when justified is considered a significant benefit of the Scottish approach.

9.22 The breakdown of the secondary codes is as below.[1]

Secondary Coding	% of cases with a secondary code recorded (c. 17,270 secondary codes used for period June 2025 to May 2026)[2]
Substandard Quality	36.66%
Not As Described	12.44%
Delays	9.51%
Contracts	7.93%
Pricing	7.26%
Unsatisfactory Repair	5.96%
Online Order	5.62%
Safety Issues	4.45%
Misleading Advertising	3.93%
Scam	2.59%
Pressure Selling	0.68%
Finance	0.58%
Deposit	0.56%
Hygiene	0.52%
Guarantee	0.48%
Digital Marketplace	0.29%
Discrimination	0.20%
Subscription	0.17%
Third Party Intermediary / Broker	0.08%
Sell-by-date	0.07%
Product Recall	0.02%

[1] All references to case numbers reflect new cases only. A consumer may contact an adviser multiple times for the same case.

[2] The total of 17,269 secondary codes used is higher than the number of cases with secondary codes applied as more than one secondary code can be applied to a single case

9.23 It is essential that the complaint types reflect the challenges consumers face accurately, to allow for reliable trend analysis and identification of significant risks or detriment to individuals or groups. Potential additions of issues that could be worthy of flagging include Phoenixing (closing a company to abandon debts, while immediately starting a new company with the same or similar business, assets, and management) and Data Harvesting (complaints organisations are collecting large amounts of data, potentially in misleading ways).

9.24 The Scottish approach is different to that used in England and Wales where coding is focused on complaint type only, but with a significantly more granular code sub-set. The Citizens Advice structure contains 17 tier 1 categories, and 89 tier 2 codes, with some more commonly used examples highlighted below:

- Defective Goods – Defective Goods (24%)
- Substandard Services – Substandard Services (23%)
- Defective Goods – Breach of Contract (9%)
- Substandard Services – Customer Service (7%)
- Delivery / Collection – Failure / delay in delivery (3%)

Secondary Codes Consultation Questions

Question 11 - Based on the existing secondary code set, are there codes that are no longer useful or provide little to no value for your work (which could be merged or removed)?

Question 12 - Are there any secondary codes that are missing and should be added to capture emerging issues or existing consumer behaviours more accurately?

Question 13 - Is the functionality of adding multiple secondary codes on an individual case of value or is there a maximum number that is helpful for your work? Multiple secondary codes may be used either where multiple issues are identified by an adviser, and / or to add a “flag” to enable monitoring.

Question 14 – is the current structure where the secondary coding field is used for a number of different types of information beneficial for your intelligence gathering or would your work be better supported by their inclusion in information specific fields, e.g. Digital Marketplace / Third Party Intermediary / Online Order as purchase method options, and “subscription” as a payment method option.

Purchase Method

9.25 The breakdown of the categories used within the consumeradvice.scot service for Purchase Method is as below. This field captures trends in terms of how contracts were formed or agreements reached between consumer and trader and was applied to just under 60% of all advice cases.

Purchase Method	% of cases with a purchase method recorded (c. 14,780 between June 2025 and May 2026)
Trader Premises	39.36%
Trader Website	34.61%
Telephone	12.91%
Doorstep	10.76%
Private Purchase	0.67%
Mail Order or Catalogue	0.32%
Unsolicited Call	0.32%
Unsolicited Post	0.29%
Sale	0.18%
SMS	0.16%
Unsolicited Email	0.14%
Auction Premises	0.12%
Market or Street Seller	0.09%
Distance Auction	0.07%

9.26 As with other coding fields, a streamlined approach has been taken in Scotland, with the code subset comprising around half the number of codes used in England and Wales. In addition, some payment method codes are also included as options in the secondary coding field discussed above, for example "online order", "digital marketplace" and "third party intermediary / broker".

9.27 While some of the most used codes in purchase method are reflective of the types of day-to-day engagement consumers have with traders, there may be a lack of granularity reflecting these in full.

9.28 Consumers increasingly enter into contracts digitally – as reflected by the 35% of cases with a recorded purchase method flagged as "trader website" (20% of all cases). Despite this, the current structure for purchase method does not differentiate between websites, social media or social commerce where the entire transaction falls within the social media app. Furthermore, sales driven by influencer marketing can create challenges because the consumer's contract is with a trader, but the "sales pitch" is delivered by the influencer, leading to potential issues with misleading claims and accountability.

9.29 Responding to this behaviour change, the consumeradvice.scot data structure includes "digital marketplace" as a potential secondary code, which is used in 0.29% of cases where a secondary code is applied. As the secondary codes available are different for different product or service categories, this code option is not available for all cases, only being included for around half of the product / service categories.

9.30 The consumeradvice.scot data structure also includes a mandatory field where advisors record details of the specific website if trader website has been selected as the purchase method which offers another option for advisors to capture detail on online transactions.

9.31 There may be advantages to using other fields to capture granularity around the type of online transaction, and partners are invited to consider whether taken together, the current structures offer sufficient granularity to analyse and monitor trends in online transactions.

9.32 Although underpinned by more traditional payment methods, another area partners may be interested in exploring is the increasing use of AI assistants and smart products to make semi-autonomous orders for products based on overarching instruction or programming. The method of sale becomes an automated interface. This could create questions and issues about unintentional purchases and business practices.

9.33 Scottish partners may also wish to consider the benefits of being able to record product specific purchase methods. Consumer Scotland's Used Car Investigation recommended strengthening use of consumer advice case data to identify recurring issues and patterns in used-car complaints. The coding structure in England and Wales has specific options in the purchase method field that allow advisors to record if a transaction took place at a franchise or independent dealer. This is not without challenges, however, as locating it as a purchase method means that it is not possible for an adviser to record both the type of vehicle purchase that was made (e.g. online or in person) and *whether* it took place at a franchise or an independent dealership, as only one code can currently be applied by the adviser.

9.34 Given that different statutory cancellation rights and information requirements apply to purchases made entirely at a distance, it may also be of significant benefit to record specifically whether some or all of a transaction took place remotely. Adding these options to Purchase Method may not, however, be the most appropriate solution given previous challenges experienced in England and Wales in relation to moving codes between fields, and which are described below.

9.35 In England and Wales, Doorstep was moved into Method of Sale from the Complaint Type code sub-set following a consultation that took place in 2015. Feedback in that consultation varied, however the driver for this decision was it better reflected the nature of the issue (namely the sale was being conducted on the doorstep, either on an invited or uninvited basis). Since this change was made, anecdotal feedback from some partners has reflected that this change was not beneficial to their intelligence gathering.

9.36 Scotland is similar to England and Wales in that Doorstep is also included as a Payment Method, albeit Pressure Selling is also available as a secondary code option. It therefore may be that Scotland's approach is more beneficial to intelligence gathering.

Purchase Method Consultation Questions

Question 15 - Do you agree that greater granularity for Purchase Method, particularly around e-commerce codes or flags to identify distance sales would be beneficial, and what specific additions would benefit your work?

Alternatively, would your work be better supported by a different solution, such as the inclusion of such options in the secondary coding field or through the sharing of an existing field that captures the specific website used in a transaction?

Question 16 - Is it beneficial to your organisation to include purchase methods such as Doorstep, Franchise Car Dealer and Independent Car Dealer in the purchase method field, or would your intelligence gathering be better supported by their inclusion in a different coding field such as the secondary coding option?

Payment Method

9.37 The breakdown of the categories used within the consumeradvice.scot service for Payment Method is as below. This field reflects trends in terms of how contracts were paid in agreements between consumer and trader - although can also include not yet being paid and was applied to around 80% of cases.

Payment Method	% of cases with a payment method recorded (c. 19,440 between June 2025 and May 2026)
Debit Card	28.25%
Bank Transfer	21.49%
Credit Card	13.60%
Cash	7.99%
Not paid	6.66%
Hire Purchase	5.77%
Direct Debit	4.24%
Other	3.42%
PayPal	2.63%
PCP	1.70%
I am unsure	1.41%
Deferred payment	0.90%
Linked Loan	0.77%
Lease payments	0.50%

Cheque	0.43%
Store or gift voucher	0.25%

9.38 While benefitting from the ability to make more recent revisions that have streamlined from the more granular structure used in England and Wales, the Scottish payment method structure contains fewer differences than other fields with 16 options compared to 25 in England and Wales.

9.39 The additional codes in the England and Welsh structure do not feature prominently, but include: Other Credit not HP (3.43%); Not Disclosed (1.39%), Postal Order (0.01%), Escrow Accounts (0.1%), Text Message (0%), Charge Card (0.02%), CPA Continuous Payment Authority (0.04%), Banker's draft and CHAPS payments – normally high value (0.04%), Green Deal Credit / ECO – energy company obligation (0.04%), Pre pay e.g. PayPoint and UKash (0.01%), and Premium Rate Calls (0.01%).

9.40 Conversely, options used in Scotland but not England and Wales include Linked Loan and PCP.

9.41 In this code sub-set in particular, there are a small number of leading payment types used the majority of the time. Partners are therefore encouraged to consider the benefits of a granular structure that includes specific codes for payment methods that are going out of fashion, for example postal order.

9.42 In particular, partners may wish to consider whether the more important information to record is the consumer rights derived from different payment types. For example, payments made by credit card have joint liability protection under s. 75 of the Consumer Credit Act; payments made by debit card can be reversed by the bank, albeit there is no legal right to require this; while cash payments are entirely unprotected.

9.43 Nonetheless, there are also potential gaps relating to different payment methods increasingly used by consumers that partners may seek greater granularity of reporting on. These might include:

- **Buy Now Pay Later providers** - whilst meeting the definition as currently applied for 09 Deferred Credit, this does not differentiate between more traditional delayed repayment options for larger purchases consumers (such as furniture), and more recent providers offering deferred payment for up to three months
- **Cryptocurrency** - There is currently no way for an adviser to record a purchase having been made in any form of cryptocurrency
- **Digital payment and Mobile wallet functions** - whilst these are often underpinned by one of the other payment methods (such as debit or credit card) it might still be beneficial for partners to know this also formed part of the transaction

9.44 To future proof this sub-set of codes, there are other inclusions to consider. For instance, there have been examples of pilots using palm scans or facial recognition, effectively moving towards an individual's identity as a form of payment. Whilst in other categories such as goods and services and complaint type, future code requirements may be harder to accurately predict, here it may be prudent to include codes that reflect ongoing technical innovations in processing payments between parties.

Payment Method Consultation Question

Question 17 - Whilst a priority for all code sub-sets, do you agree that future proofing the payment method coding structure to the fullest extent possible is of particular importance? If so, please comment on and expand upon the suggested additions.

Value Spent, Value Paid to Date, Purchase Date

9.45 Being able to accurately define the financial cost of a purchase (whether already paid in full or not) and when it occurred are of significant importance to partners.

9.46 The date of purchase in particular is of direct relevance to a consumer's rights given timelines for specific remedies as set out in the Consumer Rights Act 2015 and the Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013

9.47 Whilst there may be amendments to how these fields are applied and interpreted by advisers when entering data, there is no usage or feedback from existing channels to suggest changes to these are necessary.

9.48 If there are any partner suggestions on how they might be improved or augmented through additional data, these can be submitted within responses to question 29, which focuses on wider opportunities for strategic additions across the coding structure.

Pre Contract Cancellation Rights

9.49 Although not a field made available to partners from the Scottish data structure, it is used in England and Wales as an internal prompt for advisers to confirm the consumer has been asked about the status of pre-contract cancellation information. It ensures accurate advice is offered on this subject, and also then reminds advisers to code the Complaint Type to reflect this activity from the trader, where relevant.

9.50 The Scottish structure captures this data through its Criminal Concern Type field which includes an option for failure to provide PCI / cancellation rights. Analysis shows it was only applied to around 10 cases during the period June 2025 to May 2026.

9.51 Given that cancellation rights are a legal requirement for distance sales, partners may see benefit in the Scottish code structure containing a similar prompted option that could then be made available to partners for their analysis.

Pre contract cancellation rights consultation question

Question 18 - Is data relating to the failure of providing pre-contract cancellation rights to consumers of significant importance to your work? What would be the most beneficial way for this to be provided to you? Options could involve this being an option in the criminal concern type field, or having a mandatory stand-alone field that specially assesses an advice case for pre contract cancellation rights.

Scam / Rogue Trader

9.52 Scam / Rogue Trader is a mandatory standalone field in the English and Welsh code structure that is not directly replicated in Scotland where this information is instead captured via secondary coding.

9.53 Citizens Advice added the overarching field following a consultation in 2015, with the aim of enabling straightforward identification of a scam for those using the data, leading to more consistent analysis of trends as it was a standalone field that could be used regardless of the product or complaint type. Prior to 2015, the information would have been reported in the case notes.

9.54 Neither the Scottish nor the English / Welsh solution allows an advisor to indicate *why* a case is flagged as a scam or rogue trader - this can only be added to the case notes. Feedback from partners is this presents an opportunity to augment the information recorded relating to scams and fraud.

Scam / Rogue Trader Consultation Question

Question 19 - Does the current scams coding option as a secondary code and / or a Product or Service code provide sufficient information, in conjunction with case notes and other coding, to enable your work most effectively? What additional information would ensure this was the case if not? Partners may wish to think about the potential value of capturing scam / rogue trader as a mandatory standalone field.

Detriment Type and Value

9.55 Both the Scottish and English / Welsh code structures capture detriment value specifically, however England and Wales have gone a step further by also including a field that records detriment type.

9.56 The changes were made following a 2015 consultation which supported the intention to create detriment fields in principle, although views on how this could be achieved were varied, and there were a number of concerns.

9.57 The rationale for these codes was it would allow an adviser to differentiate between the contract value within the Purchase Amount field, and the actual impact to the consumer in both financial and non financial terms.

9.58 A field was added to capture the monetary impact of detriment in numerical form, which is replicated in the Scottish structure. This is often, but not necessarily, the same amount as the value spent and / or the value paid to date, however it can also be less or more than this amount.

9.59 In the Scottish data, this field is completed for around a third of all advice cases, with the amount input ranging from £0 to £1million.

9.60 The detriment type field included in the English and Welsh structure captures both financial and other types of detriment, for example impact on time, wellbeing or health. It includes 7 codes:

- Not part of discussion / no detriment
- Out of pocket expenses / inconvenience
- Reduced value of goods
- Time off work required / loss of earnings
- Issue led to or increased financial difficulty
- Other financial detriment
- Issue led to / increased anxiety, stress or depression
- Issue required medical treatment

9.61 Feedback from partners in England and Wales is that in practice, the use of these fields has proved problematic across all case types. The fields are only completed using information volunteered by the consumer, and not through questioning. This reflected concerns in responses to the consultation that consumers would feel compelled to provide examples for the majority of cases which may not have actually represented true detriment.

9.62 Feedback has further highlighted that consumers both over and understate their experience when describing detriment. They are often unable to accurately or meaningfully quantify losses for many of the codes featured above, turning to advisers for guidance which they cannot and should not provide.

9.63 Whilst there is clear value in being able to ascertain the scale of any consequential losses, non-direct financial impacts or non-monetary detriment, the current structure of codes, and the process around their use, may not provide partners with reliable and significant data sets. There could be value in identifying the type(s) of detrimental impact without collecting amounts, or applying broad value ranges for financial losses (say, for example £0 - 100, £100 - £250 etc.)

9.64 Within Scotland, introducing a reassessed detriment type field might also lead to more meaningful application by advisers and consumers. Indeed, this could be simplified down to financial or non-financial.

Detriment Type Consultation Questions

Question 20 - Given the above challenges, is the addition of a Detriment Type and retention of a Detriment Value field important to the work of your organisation?

Question 21 - Would the collection of this information in a broader sense still provide value if the process for collection was simplified? For example if no Detriment Value was collected, a range of values was used as opposed to an amount specified by the consumer, or the Detriment Type codes were condensed?

10. Energy

10.1 This project also encompasses review of codes used to categorise energy advice cases, offering an opportunity for rigorous and objective assessment of the current code sets and the opportunities for development.

10.2 Unlike the wider consumer advice dataset and the English and Welsh energy advice dataset, detriment is not currently collected as a structured field within the Scottish energy advice dataset.

10.3 Due to this difference, partners are invited to consider the benefit of recording detriment information for energy cases in the same way as it is for consumer, while taking into account the problems experienced in the collection of this data for the consumer advice service and described above. Responses to this question can be submitted through questions 20 and 21, and we request that responses state clearly which advice service they relate to.

10.4 For energy cases, there are a number of fields used in England and Wales that collect minimal levels of information. Some of these are used to support the adviser as prompts to ask for certain information or follow appropriate processes in areas like making referrals. Others are to ensure advice is offered on the correct basis. They are either binary Yes/No fields, or very limited options for pre-selected data selection using radar buttons.

10.5 While some of these fields also form part of the Scottish data structures and are shared with partners, that is not the case for all.

10.6 Partners are asked to consider whether there would be significant value in replicating such fields in Scottish data structures, with the information also being made available to partners for their analysis.

10.7 A summary of the fields of this type is outlined below. Where a field does not currently exist in Scottish structures, this has been flagged:

Field	Code sub-set	Used in Scotland
Responsibility for account	Responsible for account No account holder permission Representing the account holder	No
Energy supplied address	Home Micro Business Small Business Business	Customer Type – Heat Network, Consumer, Microbusiness, Small Business

Supply type	Dual Fuel Electric Gas Hydrogen	Yes – Electricity, Gas, Duel OOS, Duel Fuel
Smart meter	Yes / No	No
Company contacted	Yes / No	Have you contacted the supplier – Yes, No
Off supply	Yes / No	Off Supply is not represented by a single code, rather the information is derived from a combination of fields and coding
Method of sale	Telephone Internet Direct Mail Doorstep Public Place Trader Premises Trader Website and apps	No
Payment method	Credit Card Debit Card Direct Debit Fuel Direct Cheque Pre-payment meter Weekly cash (Post Office/Bank)	Yes – Weekly Cash, Direct Debit, PPM, Credit Card
Vulnerable / Urgent	Yes / No	Illness / Disability – Yes, No

10.8 The definitions of each of these can be referenced in the energy code table earlier in the consultation.

Energy Data Structure Overarching Consultation Question

Question 22 - Given the above energy data fields are used in many cases to drive adviser behaviours, do you have any views on whether additional fields should be created for sharing with partners, and if so, would the sub-sets benefit from additions?

Energy Code

10.9 This code is the equivalent of Complaint Type in consumer cases, describing the nature of the problem between consumer and supplier, or wider area of advice the consumer requires if not a dispute. It is a two tier structure, with the first tier as an overarching issue type of similar issues grouped together, and 89 second tier codes providing a detailed description. For example tier 1 code (BE) Billing Error contains a number of sub-codes that relate to this theme, such as (BE17) Direct debit issues, (BE18) Catch up bill received and (BE19) Bill format unclear.

10.10 An adviser can add a single energy code to an advice case.

10.11 A breakdown of the tier 1 categories at energyadvice.scot for Energy Code is as below - which reflects the trends services see in terms of the issues consumers seek advice on.[3] The Scottish structure has small differences to that used in England and Wales with the inclusion of some additional tier 2 codes in the tier 1 categories. For a full list, please see Appendix B.

Issue type	% of total cases (circa 12,250 cases – June 2025 to May 2026)
Advice/information	38.37%
Billing	30.92%
Metering (general)	7.58%
Smart meters	6.80%
Debt management, affordability and disconnection	5.67%
Failed Supplier	3.85%
Prepayment meters (PPM)	2.02%
Transfers	1.55%
Customer service failure	1.50%

10.12 By far the greatest volume of cases featured tier 2 code AD2 – Customer Support Payment, or AD5 - Company Contact Details (non-complaint purposes), which collectively accounted for around 3,150 cases or around a quarter of the entire dataset.

10.13 Whilst there are a number of codes that are not frequently used, given these operate within a regulatory environment and there have been no proposals in the intervening informal reviews with energy partners, we do not propose any additions, deletions or merges, unless guided towards this by the sector.

[3]All references to case numbers reflect new cases only. A consumer may contact an adviser multiple times for the same case.

Energy Codes Consultation Questions

Question 23 - For Energy cases, are there any changes required to the code set, from an addition, merge or deletion perspective?

Question 24 - Is the functionality of advisors adding a single explanatory code on an energy case helpful, or would the ability to add more for more complex cases be beneficial? What would be the correct maximum threshold for your work?

11. Post

11.1 Post case data structures also fall into the scope of this project, however postaladvice.scot service receives a small number of cases (c. 145 between June 2025 and May 2026), therefore partners should be cognizant of the fact that there is less analytical value to be obtained from significantly altering data structures, particularly from increasing the number of codes within a single field.

11.2 Unlike the wider consumer advice dataset and the English and Welsh energy advice dataset, detriment is not currently collected as a structured field within the Scottish postal advice dataset.

11.3 Due to this difference, partners are invited to consider the benefit of recording detriment information for post cases in the same way as it is for consumer, while taking into account the problems experienced in the collection of this data for the consumer advice service and described above. Responses to this question can be submitted through questions 20 and 21, and we request that responses state clearly which advice service they relate to.

11.4 In post cases there are a number of fields that collect minimal levels of information. Some of these are used to support the adviser as prompts to ask for certain information or follow appropriate processes in areas like making referrals. Others are to ensure advice is offered on the correct basis. They are either binary Yes/No fields, or very limited options for pre-selected data selection using radar buttons.

11.5 While some of these fields also form part of the Scottish data structures and are shared with partners, that is not the case for all.

11.6 Scottish partners are asked to consider whether there would be significant value in replicating such fields in Scottish data structures, with the information also being made available to partners for their analysis.

11.7 A summary of the fields of this type is outlined below. Where a field does not currently exist in Scottish structures, this has been flagged:

Field	Code sub-set	Used in Scotland
Sender/Recipient	Yes No Representing the sender / recipient	No
Postal served address	Yes No	No
Postal served address type	Home Business	Customer Type – Consumer,

		Microbusiness, Small Business
Date posted	Numerical value	No
Cost of service	Numerical value	No
Service start/end date	Numerical fields	No
Company contacted	Yes / No	Have you contacted the supplier – Yes / No
Difficulty with Royal Mail complaints	Yes / No	No
First contact	Numerical field	No
Vulnerable / Urgent	Yes / No	Illness / Disability – Yes, No
Mail Contents & Value	Free text and numerical field	No

Post Data Structure Overarching Consultation Question

Question 25 - Given the above post data fields are used in many cases to drive adviser behaviours, do you have any views on whether any should be implemented in Scotland for sharing with partners, and if so, would the sub-sets benefit from additions?

Post Codes

11.8 This code is the equivalent of Complaint Type in consumer cases, describing the nature of the problem between consumer and supplier, or wider area of advice the consumer requires if not a dispute. It is a two tier structure, with the first tier as an overarching issue type of similar issue grouped together, and 86 second tier codes providing a detailed description. For example tier 1 code (MD) Mail Delivery contains a number of sub-codes that relate to this theme, such as (MDA01) Lost mail, (MDA02) Damaged Mail and (MDA03) Misdelivery

11.9 An adviser can add a single Post Code to an advice case.

11.10 A breakdown of the tier 1 categories at postaladvice.scot for Issues is as below - which reflects the trends services see in terms of the most common issues consumers seek advice on.[4] For a full list of codes, including tier 2 categories, please see Appendix B.

Issue type	% of Total (circa 145 cases – June 2025 – May 2026- Dec 24)
Mail delivery	86.21%

[4] All references to case numbers reflect new cases only. A consumer may contact an adviser multiple times for the same case.

(Codes beginning MC and relating to mail collection comprise only 6.21% of the total cases)	
Mail collection	6.21%
MPS/direct mail opt-out schemes (failure to stop unwanted post)	6.21%
Delivery office / sorting office issue	1.38%
Miscellaneous	1.38%
Royal Mail procedures	1.38%
Royal Mail unregulated products/services	1.38%
Post Office network issues	0.69%
Postal address issues	0.69%

11.11 Tier 2 codes for Lost Mail and Delayed Mail were the most commonly used, each accounting for around three in ten of all requests for advice during the period, which was significantly higher than any other. The other more commonly used codes include:

- Misdelivery (12%)
- Mail collection – other (4%)
- Damaged mail (4%)
- MPS / Direct mail opt-out schemes (4%)

Post Codes Consultation Questions

Question 26 - For post cases, are there any changes required to the code set, from an addition, merge or deletion perspective?

Question 27 - Is the functionality of advisors adding a single explanatory code on a post case helpful, or would the ability to add more for more complex cases be beneficial? What would be the correct maximum threshold for your work?

Product Codes

11.12 Given there are a vast number of regulated postal products, partners may see benefit in collecting information on the type of service the consumer has purchased or had an issue with, as well as the nature of that issue. This forms part of the data structure in England and Wales but is not replicated in Scotland. The following section describes the English and Welsh structure to enable partners to consider if there would be value in replicating this for Scotland.

11.13 The English and Welsh structure is two tier with the first tier as an overarching issue type of similar issue grouped together, and 46 second tier codes providing a detailed description. For example tier 1 code (RMW) Royal Mail Special Delivery contains a number of sub-codes that relate to this theme, such as (RMWAU) Special delivery by 9am and (RMWBR) Special delivery by 1pm (business account - no).

11.14 A description of the tier 1 codes used in England and Wales, together with their relative frequency of use is provided below to allow partners to better assess the value to their work of including similar information in Scottish data structures. Should codes that accurately reflect regulated products be added to the Scottish data structures this may support partners to draw meaningful insights on consumer behaviour and the issues faced with product(s) they select in sending items by post:

Issue type	% of Total Cases (circa 3,137 cases - Jan 2024 - Dec 24)
(RMA) Royal Mail International Standard	0.5%
(RM) Royal Mail	37.7%
(RMJ) Royal Mail International	0.9%
(RMK) Royal Mail Keepsafe	0.1%
(RMV) Royal Mail Return / Redirect	0.4%
(RMW) Royal Mail Special Delivery	4.7%
(RMT) Royal Mail Postbox	0.0%
(XXA) Non-Royal Mail Domestic	30.0%
(XXC) Non-Royal Mail (international)	18.8%
(XX) Non-Royal Mail	0.3%
(ZZZ) Other	6.6%

Product Codes Consultation Question

Question 28 – Would it be valuable for your organisation to have access to post Product codes reflective of the range of regulated postal products available to consumers, both now and in the foreseeable future?

Additional requirements or views

11.15 The above questions have been designed to extract views from the consumer protection landscape on needs across the range of codes recorded as part of case logging. It is recognised however that, despite the scope of the review project not extending to a 'blank page' approach, there may be further additions or more structural changes that partners wish to include in their response.

11.16 To that end, we would be keen to understand any further augmentations that could be made to the data shared with partners.

11.17 It is important to emphasise the need to balance landscape data requirements with both operational and technical viability. Coding needs to remain intuitive and reflect ADS role as an advice giving organisation that collects data as part of that function, not an intelligence gathering service. As such, responses should outline the needs and potential benefits of any wider data changes within this context. This will ensure they are able to meet the necessary thresholds for consideration when we begin to identify solutions and make decisions ahead of our consultation response.

Additional Requirements Consultation Question

Question 29 - Recognising technical and operational considerations, and the scope of the Consumer Codes review as outlined in this document, are there any further data needs your organisation would benefit from to optimise the outcomes it is achieving? Please be as specific as possible in terms of a) the data that would need to be collected and b) in what way it could be used to enhance consumer protection activities.

12. Appendix A – Consultation Questions

Consumeradvice.scot – Overarching questions

Question 1 - How well does the current Scottish code structure enable you to fulfil your responsibilities and obligations within the consumer protection landscape?

Question 2 - Are there any elements of the current Scottish code structure that are essential to your work, and in your view should not be altered? In your response please consider any differences between the Scottish and English / Welsh structures.

Question 3 - Which of your organisation's strategic or operational priorities could this review project positively impact or contribute towards?

Question 4 - Balancing the needs of the consumer landscape against the needs of operational requirements for a coding structure, would you agree the current breadth and depth of Scottish coding is broadly correct. If not, how might changes provide more value to your work?

Question 5 – How valuable is it for your organisation to be able to conduct cross-border analysis to compare Scottish issues against GB? If this is valuable, what level of comparability is needed to facilitate this, e.g. identical structure, agreed mapping, or another solution?

Question 6 – to what extent does your organisation make use of the qualitative data shared by ADS in free text advisor case notes? Do you experience any challenges or barriers in conducting analysis using these notes?

Consumeradvice.scot – Product and Service

Question 7 - Based on the existing Scottish code sub-set, are there specific Product and Service codes that are no longer useful or provide little to no value for your work (which could be merged or removed)?

Question 8 - Are there any Product or Service codes that are missing and should be added to capture emerging issues or existing consumer behaviours more accurately?

Question 9 - Do the tier 1 and tier 2 code headings still reflect modern consumer behaviour. Is there a need for these to be redefined or reorganised to support your work more effectively?

Consumeradvice.scot – Criminal Concern Type

Question 10 – Are the Scottish Criminal Concern Type codes effective for your organisation's needs? Are there any that should be added, removed or amended to accurately capture unfair or otherwise problematic practices that are covered by consumer rights legislation?

Consumeradvice.scot – Secondary Codes

Question 11 - Based on the existing secondary code set, are there codes that are no longer useful or provide little to no value for your work (which could be merged or removed)?

Question 12 - Are there any secondary codes that are missing and should be added to capture emerging issues or existing consumer behaviours more accurately?

Question 13 - Is the functionality of adding multiple secondary codes on an individual case of value or is there a maximum number that is helpful for your work? Multiple secondary codes may be used either where multiple issues are identified by an adviser, and / or to add a "flag" to enable monitoring.

Question 14 – is the current structure where the secondary coding field is used for a number of different types of information beneficial for your intelligence gathering or would your work be better supported by their inclusion in information specific fields, e.g. Digital Marketplace / Third Party Intermediary / Online Order as purchase method options, and "subscription" as a payment method option.

Consumeradvice.scot – Purchase Method

Question 15 - Do you agree that greater granularity for Purchase Method, particularly around e-commerce codes or flags to identify distance sales would be beneficial, and what specific additions would benefit your work?

Alternatively, would your work be better supported by a different solution, such as the inclusion of such options in the secondary coding field or through the sharing of an existing field that captures the specific website used in a transaction?

Question 16 - Is it beneficial to your organisation to include purchase methods such as Doorstep, Franchise Car Dealer and Independent Car Dealer in the purchase method field, or would your intelligence gathering be better supported by their inclusion in a different coding field such as the secondary coding option?

Consumeradvice.scot – Payment Method

Question 17 - Whilst a priority for all code sub-sets, do you agree that future proofing the payment method coding structure to the fullest extent possible is of particular importance? If so, please comment on and expand upon the suggested additions.

Consumeradvice.scot – Pre Contract Cancellation Rights

Question 18 - Is data relating to the failure of providing pre-contract cancellation rights to consumers of significant importance to your work? What would be the most beneficial way for this to be provided to you? Options could involve this being an option in the criminal concern type field, or having a mandatory stand-alone field that specially assesses an advice case for pre contract cancellation rights.

Consumeradvice.scot - Scam / Rogue Trader

Question 19 - Does the current scams coding option as a secondary code and / or a Product or Service code provide sufficient information, in conjunction with case notes and other coding, to enable your work most effectively? What additional information would ensure this was the case if not? Partners may wish to think about the potential value of capturing scam / rogue trader as a mandatory standalone field.

Consumeradvice.scot / Energyadvice.scot / Postaladvice.scot - Detriment Type (please be clear which advice line(s) your response relates to)

Question 20 - Given the above challenges, is the addition of a Detriment Type and retention of a Detriment Value field important to the work of your organisation?

Question 21 - Would the collection of this information in a broader sense still provide value if the process for collection was simplified? For example if no Detriment Value was collected, a range of values was used as opposed to an amount specified by the consumer, or the Detriment Type codes were condensed?

Energyadvice.scot

Question 22 - Given the above energy data fields are used in many cases to drive adviser behaviours, do you have any views on whether additional fields should be created for sharing with partners, and if so, would the sub-sets benefit from additions?

Question 23 - For Energy cases, are there any changes required to the code set, from an addition, merge or deletion perspective?

Question 24 - Is the functionality of advisors adding a single explanatory code on an energy case helpful, or would the ability to add more for more complex cases be beneficial? What would be the correct maximum threshold for your work?

Postaladvice.scot

Question 25 - Given the above post data fields are used in many cases to drive adviser behaviours, do you have any views on whether any should be implemented in Scotland for sharing with partners, and if so, would the sub-sets benefit from additions?

Question 26 - For post cases, are there any changes required to the code set, from an addition, merge or deletion perspective?

Question 27 - Is the functionality of advisors adding a single explanatory code on a post case helpful, or would the ability to add more for more complex cases be beneficial? What would be the correct maximum threshold for your work?

Question 28 – Would it be valuable for your organisation to have access to post Product codes reflective of the range of regulated postal products available to consumers, both now and in the foreseeable future?

Consumeradvice.scot / energyadvice.scot / postaladvice.scot - Additional Requirements (please be clear which advice line(s) your response relates to)

Question 29 - Recognising technical and operational considerations, and the scope of the Consumer Codes review as outlined in this document, are there any further data needs your organisation would benefit from to optimise the outcomes it is achieving?

Please be as specific as possible in terms of a) the data that would need to be collected and b) in what way it could be used to enhance consumer protection activities.

13. Appendix B – Full code list

13.1 The Full list of current consumer codes used by Advice Direct Scotland, with analysis of frequency of use can be found in the accompanying spreadsheet.