



Setting Standards for
Retirement Communities

Associated Retirement Community Operators Limited
167-169 Great Portland Street, 5th Floor, London, W1W 5PF

Telephone: 020 3697 1204

Email: info@arcouk.org

Website: www.arcouk.org

Annual Report – ARCO Standards Programme 2024/25

1. Executive summary

This report covers the operation of the ARCO Consumer Code for the reporting period 1 September 2024 to 31 August 2025. It has been prepared as part of ARCO's reporting to the Chartered Trading Standards Institute under the Approved Code Scheme, following ARCO's approval as a Code Sponsor.

The report draws primarily on ARCO's 2024/25 standards programme, the most recent complete record of compliance monitoring to date. The principal evidence base is the independent external compliance assessment work undertaken by our independent assessors from The Consultant Connection (TCC), supported by ARCO's membership records, registration data, ADR and complaints reporting by The Property Ombudsman, ARCO's Standards Committee records and the ARCO Consumer Code. During the reporting period, ARCO had 25 members in scope. Our independent assessors undertook member/prospective member assessment of all members, covering 47 IRC/scheme-level assessments (approximately 28% of the total registered schemes).

No disciplinary or sanctions panel activity took place during the reporting period. Compliance queries identified through the assessment programme were managed through member-specific recommendations, feedback and follow-up, with no formal actions required. This reflects the role of the standards programme in identifying areas for improvement and supporting continuing compliance, while preserving the ability to escalate serious or unresolved non-compliance where required.

There were no complaints under the Consumer Code escalated to ARCO's independent Alternative Dispute Resolution Provider, The Property Ombudsman, during this period. This reflects the fact that the ADR scheme was newly established in 2024. Members continued to process complaints under their own complaints policies as required by the Consumer Code, with recourse to the relevant Ombudsmen (the Housing Ombudsman; TPO or the Property Redress Scheme) available under the members' own registrations with those schemes.



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The 2024/25 programme included a continued focus on areas of Code relevance for consumers, particularly around transparency of information, accessibility of Key Facts documentation, visibility of complaints routes, and the need for members to maintain clear, consistent, and accurate consumer-facing information. Its findings have informed ARCO's wider transition to a revised standards and compliance model for future reporting years.

As ever, ARCO's Standards and compliance work in 2024/25 was overseen by the ARCO Standards Committee, who meet quarterly and whose powers are set out in section 9 of the Consumer Code and in the Committee's own Terms of Reference. The Committee has the power to grant or withhold Approved Operator status, which is a condition of ARCO membership. It is independently chaired by Karen McArthur.

2. Reporting basis and evidence sources

This report covers the period 1 September 2024 to 31 August 2025.

The evidence base for this report includes:

- Independent external assessment reports completed by TCC during the reporting period
- ARCO membership and registration records
- ARCO records of complaints, ADR and member compliance queries
- ARCO records of any Code changes agreed with CTSI and implemented during the period
- Monitoring results against agreed CTSI framework for operation and effectiveness of the Code
- ARCO's records relating to member engagement, standards programme development and follow-up action

The report is structured to address CTSI's annual reporting expectations for Code Sponsors, as set out in section E3 of the Consumer Codes Approval Scheme Core Criteria and Guidance, including compliance checks, sanctions, Code changes, complaints and ADR outcomes, performance indicator results, and evidence of how the Code contributes to reducing consumer detriment.

3. Membership and assessment coverage

During the reporting period, ARCO had 25 members in scope.

TCC undertook member/prospective member assessment reports during the reporting period, covering 47 IRC/scheme-level assessments according to the following scheme (number of assessments depending on the member's number of ARCO-registered schemes).¹

¹ One member left membership at the end of the 2025/26 Standards year and their assessment was therefore not finalised.

Number of communities	Number of schemes reviewed
1-5	1
6-10	2
11-15	3
16-20	4
21-25	5
26+	6

4. Code changes agreed with CTSI and implemented

ARCO did not implement any substantive changes to the ARCO Consumer Code during the reporting period that required CTSI approval. ARCO continued to review the Code with consideration of regulatory and legal changes, monitoring outcomes, member feedback, consumer issues and sector developments.

5. Complaints and ADR

During the reporting period, ARCO monitored complaints and ADR outcomes relevant to the operation of the Code. In line with CTSI requirements, ARCO does not itself have a complaints-handling function. Instead, this is managed externally and independently by The Property Ombudsman (TPO) as the appointed ADR scheme provider for the ARCO Consumer Code (registered details listed here: <https://approvedcode.tradingstandards.uk/our-codes-of-practice/arco/>)

There were no complaints under the Consumer Code escalated to the TPO ADR scheme during 2024/25. No ADR outcome during the period resulted in a referral to ARCO's disciplinary and sanctions process or required a change to the Code.

6. Disciplinary and sanctions panel activity

There was no disciplinary and sanctions panel activity during the reporting period, and no sanctions were imposed for non-compliance.

Compliance queries identified through the 2024/25 standards programme were handled through the external assessment process, recommendations to members, and ARCO's follow-up engagement. This was appropriate for the queries identified during the period, which were generally managed as improvement and compliance assurance matters rather than cases requiring formal disciplinary escalation.

7. Monitoring and KPI results

The ARCO standards programme covers all Approved Operators, provisional and prospective members. According to the 2024/25 Standards and Compliance Framework, annual independent assessments were carried out for all members against ARCO's Consumer Code criteria. The scheme required that members undergo

between 1-6 assessments per year, proportional to the number of registered schemes or communities. We aimed to assess at least 20% of the total registered locations annually and 28% were assessed during 2024-25. Members are actively assessed against all aspects of the Consumer Code, and every member is making continual changes and improvements each year as a direct result of programme recommendations. To give an idea of scale, well over 2,000 documents are reviewed annually by independent, external assessors. We believe the programme to be very robust, going much further than the CTSI core requirements expect. That said, we have continued to iterate and develop the programme based on our learnings and have introduced further improvements – to be detailed in our next annual report.

Below is a table showing the CTSI-specific KPIs that ARCO has monitored, which CTSI audit ARCO against annually, in addition to the Code requirements already covered by our annual assessment programme. Some of these KPIs cover monitoring already conducted by the annual assessment process:

KPI	Result	Notes
Number of members assessed	100%	
Number of member IRC complaints going to ADR provider	0	
Percentage of ADR resolutions for member IRC complaints that were found in favour of the complainant	0%	(See above)
Percentage of assessed IRCs where residents have high overall satisfaction	100%	This is assessed as part of the independent assessment process. All members are required to carry out resident satisfaction surveys and evidence results.
Percentage of total registered IRCs assessed	28%	ARCO aims to assess at least 20% annually.
Percentage of assessed IRCs that have trained relevant staff on the ARCO Consumer Code	100%	Members must evidence training and records as part of the independent assessment process.

Percentage of member IRCs which offer self-contained accommodation that can be occupied with security of tenure	100%	This is a condition of membership and registration criteria of the ARCO Consumer Code. This is checked annually.
Percentage of member IRCs which enable residents to take advantage of personal care	100%	This is a condition of membership and registration criteria of the ARCO Consumer Code. This is checked annually.
Percentage of member IRCs which have staff available at the community 24 hours a day	100%	This is a condition of membership and registration criteria of the ARCO Consumer Code. This is checked annually.
Percentage of member IRCs which offer communal facilities, an active social programme, and dining facilities	100%	This is a condition of membership and registration criteria of the ARCO Consumer Code. This is checked annually.
Percentage of assessed IRCs' property listings with prices / ranges which state that other fees apply	100%	This KPI has now been superseded by changes to legislative requirements following the implementation of the Digital Markets, Competition and Consumers Act 2024. ARCO is actively ensuring members are working to abide by these new standards and expectations. We expect the KPIs will be adjusted by agreement with CTSI in future.
Percentage of assessed IRCs that have an up-to-date key facts document to provide to potential residents	100%	This is assessed as part of the independent assessment process and is a core Consumer Code requirement.

Percentage of assessed IRCs where the service charge, as well as rent if an inclusive fee, is clearly mentioned on the key facts document	100%	This is assessed as part of the independent assessment process and is a core Consumer Code requirement.
Percentage of assessed IRCs where the event fee is clearly mentioned on the key facts document (counting only communities that have an event fee)	100%	This is assessed as part of the independent assessment process and is a core Consumer Code requirement.
Percentage of assessed IRCs where a worked example of the event fee is provided in consumer-facing documentation (counting only communities that have an event fee)	100%	This is assessed as part of the independent assessment process.
Percentage of assessed IRCs where the ARCO Consumer code is available (or directly linked to) on member websites	100%	This is assessed as part of the independent assessment process.
Percentage of assessed IRCs where the ARCO logo is shown on member websites	100%	This is assessed as part of the independent assessment process.

Percentage of assessed IRCs where the CTSI kitemark is shown on member websites	100%	This is assessed as part of the independent assessment process.
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Regarding evidence, some indicators are based on independent compliance assessments. Others are based on evidence provided by members, reporting by TPO (ADR provider) and ARCO’s registration and membership records. ARCO will continue to improve the consistency of evidence collection through revisions to the standards programme from 2025/26 onwards.

8. Highlights of success in reducing consumer detriment

The 2024/25 standards programme contributed to reducing potential consumer detriment by providing independent review of member compliance with the ARCO Consumer Code, identifying best practice and areas for continuous improvement of consumer-facing information, and requiring members to address any queries identified through the standards process.

The most important areas of focus identified through the 2024/25 programme were:

- ensuring that prospective residents and families can access clear, accurate and timely pre-contractual information
- ensuring the visibility and consistency of Key Facts documentation
- checking that complaints information and escalation routes are available and understandable
- regularly reviewing the clarity of website and marketing information
- checking that members continue to evidence their commitment to the Code and its requirements
- identifying inconsistencies or gaps before they crystallise into consumer harm or formal complaints.

9. Review of the Code and future improvements

The 2024/25 reporting period was also a key transition point for ARCO’s standards and compliance work. Findings from the external assessment model have informed ARCO’s development of a new standards programme for 2025/26 onwards, that still uses independent compliance reviews but also includes greater use of structured self-audit, clearer evidence collection, member-specific action planning and improved oversight of recurring compliance themes.

For further information on ARCO’s standards and compliance programme, please contact consumercode@arcouk.org