Issues procedure

Step 1

Supplier or other (source) informs GCA of suspected Code breach

GCA clarifies:

1) Which aspect of the Code has been breached?
2) What action is sought?

Has it been raised with retailer(s)? If so, what was the outcome?

Arbitration → **Direct to Arbitration Policy**

Contribution to evidence (investigation)

Request that the GCA approaches retailer(s) informally

GCA reviews whether issue is new or known

New → **Contact retailer**

GCA informally advises retailer(s) of issue (supplier anonymity safeguarded)

Known

Consider alongside other evidence

Supplier anonymity safeguarded

GCA considers issue (ongoing as evidence base grows)

Proceed to Step 2

Step 2

Known issues

GCA reviews existing evidence

No further action at this time (await further corroborating evidence)

Further action merited Proceed to Step 3

Step 3

GCA decides on course of action

Further evidence or analysis needed → Commission further work

1) No breach of Code
2) Retailer agrees to remedy the practice

Give advice to CCOs and/or publish advice online

Publish guidance

Publish case study

Seek retailer voluntary commitment

Sufficient grounds for investigation

Consider against prioritisation principles (see guidance)

If met → **GCA may launch an investigation**

If not met

Supplier anonymity safeguarded