

# 2021-2026 Corporate Plan

Consumer Council for Northern Ireland

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## Introducing our plan

## We first published our 2021-2024 Corporate Plan in April 2021, as the world slowly began to emerge from the COVID-19 pandemic.

Informed by consumer feedback, insights from our research and outreach and engagement with stakeholders, we identified the challenges from pandemic, the largely unknown impact of EU Exit, and our ambitions for decarbonisation and digitalisation as the most important priorities consumers were likely to face over the period of our corporate plan.

There is no single consumer perspective. In the three years that has followed, societies and economies have changed significantly, and our ability to respond was tested like never before. Despite this, our staff worked tirelessly to serve, protect and campaign for the interests of consumers, regardless of circumstances, to build their resilience and welfare.

In parallel, we sought to make markets work in the interests of consumers, by ensuring service providers, government, regulators and other key stakeholders reflected consumer needs and expectations, while addressing current and emerging risks, when designing and delivering public policy, regulation, and products and services for Northern Ireland.

We remain in unchartered territory. To ensure we are sufficiently agile in meeting demand, capture and address detriment and vulnerabilities, and deliver expected outcomes, we horizon scan the consumer landscape every year. This resulted in updates to the consumer priorities and extended strategic ambition, set out in our 2021-2026 Corporate Plan.

#### 2021-2026 Corporate Plan

Responding to changing consumer need, we replaced recovery from the pandemic with helping consumers mitigate the ongoing cost of living crisis, and sharpened our focus from digitalisation to digital inclusion. This ensures we can deliver a flexible and responsive service for all citizens, as well as understand their needs, preferences and behaviours.

There has never been a more important time in our history to champion, protect and represent consumers. Health, lives, livelihoods and finances have been disrupted in ways few could have imagined. This has been compounded by the threat of widening inequality and disparity in consumer experiences, set to continue for some time.

Most of Northern Ireland's economic output is driven by consumer spending which plays a critical role in rebuilding and rebalancing our economy. We must build their confidence and justified trust in markets. The only way is for consumer bodies to coalesce with government, regulators, industry and civic society towards creating a just, fair and safe society.

We must also listen more to consumers, and collaborate and co-design with stakeholders to ensure the diversity of consumer interests are fully represented and considered. In the same vein, our regulatory frameworks must equally prioritise education, empowerment and accountability, alongside standards for protection, compliance and enforcement.

The difficulties many consumers face are momentous, not least because of the inequalities in wealth and opportunity, there are also new possibilities. We will strive to improve the lives of consumers, supporting them through challenges, helping them embrace new possibilities, and working with partners to find solutions that deliver a shared vision for consumers.

## The Consumer Council

## Who we are

We are passionate about championing consumer interests, and we put them at the heart of everything we do. As the statutory, independent consumer representative body of Northern Ireland, we are responsible for ensuring that legislation and regulation for consumer protection works effectively for consumers here.

## We are an insight-led evidence based organisation:

- Providing consumers with expert advice and confidential guidance.
- Engaging with government, regulators and consumer bodies to influence public policy.
- Empowering consumers with the information and tools to build confidence and knowledge.
- Investigating and resolving consumer complaints under statutory and non-statutory functions.
- Undertaking best practice research to identify and quantify emerging risks to consumers.
- Campaigning for market reform as an advocate for consumer choice and protection.

### **Our powers**

Established in April 1985 as a non-departmental public body (NDPB) under the General Consumer Council (Northern Ireland) Order 1984 (The Order), we operate under the Department for the Economy (DfE) on behalf of the Northern Ireland Executive (The Executive).

Our statutory powers cover consumer affairs, energy, transport, water and sewerage, postal services and food affordability and accessibility. These are drawn from legislation, licences given to companies working in Northern Ireland, and cooperation agreements set in memorandums of understanding. The work we do also aligns with a number of the Articles in the Protocol on Ireland and Northern Ireland (NI Protocol).

Our non-statutory functions are to educate, empower and support consumers against discriminatory practices against any market through advocacy work, as well as education and outreach programmes covering a broad range of topics including consumer rights, safer finances and a more sustainable energy future.

Across all our areas of work, we pay particular regard to consumers:

- who are disabled or chronically sick
- who are of pensionable age
- who are on low incomes
- who live in rural areas

We have responsibilities under the Rural Needs Act 2016 and Section 75 of the Northern Ireland Act 1998. We aim to ensure public policy recognise consumer needs in rural areas, and promote equality of opportunity and good relations in a range of equality categories.

## Super-complaints

We are committed to ensuring positive outcomes for consumers. We are a designated supercomplaints body set up under the Enterprise Act 2002 and the Financial Services and Markets Act 2000 Order 2013.

Under both Acts, the Consumer Council can, if we believe any feature or combination of features of a market in the United Kingdom (UK) is, or appears to be, significantly harming the interests of consumers, raise a super-complaint on behalf of consumers to the following UK and Northern Ireland regulators:

- Civil Aviation Authority
- · Competition and Markets Authority
- Financial Conduct Authority
- Office of Communications
- Office of Gas and Electricity Markets
- Office of Rail and Road
- Payment Systems Regulator
- Utility Regulator
- Water Services Regulation Authority

Under the Gas and Electricity Licence Modification and Appeals Regulations (Northern Ireland) 2015, we can appeal to the Competition and Markets Authority if we believe a modification by the Utility Regulator to the licence of a gas or electricity provider is detrimental to the interests of consumers.

## **Operating model**

Our Board, appointed by the Economy Minister, oversee our strategic direction, corporate governance and performance. Supporting them is our Senior Leadership Team, led by the Chief Executive and around 55 staff working in consumer policy, protection, research and outreach, and in communications, finance, human resources and business transformation.

Our annual operating budget is made up of funding from, Department for the Economy (DfE), and levies collected against our statutory duties administered by DfE from the Utility Regulator (UR), Department for Infrastructure (DfI), Department for Business and Trade (DBT) and HM Treasury (HMT).

We also collaborate with UK Government and Northern Ireland Executive Departments on partnership projects to deliver positive outcomes for consumers.

## Success so far

We have a proud history of promoting and safeguarding consumer interests. We work with government, and UK and Northern Ireland regulators, to ensure markets and public services focus on delivering better outcomes for consumers.

During our Corporate Plan 2016-2021, we:

- Campaigned for fair, affordable and transparent pricing models from providers in energy, post, transport and water.
- Worked in partnership with service providers in energy, post, transport and water to strengthen access to their products and services for all consumers.
- Ensured the negotiations on the Integrated Single Electricity Market between the UK and European Union (EU) recognised impacts and necessary consumer protections for Northern Ireland.
- Provided impartial research insights, advice and guidance, and comparison tools to build consumer confidence so they can make informed choices, improving consumer welfare.
- Helped to secure compensation for consumers through our independent complaints resolution process.
- Advised citizens and businesses on their consumer rights.

We are ambitious in our plans and targets in order to deliver on behalf of the citizens of Northern Ireland, building their confidence and resilience.

We measure our performance through four consumer outcomes, launched in 2023, using evidence and insight from our research, analysis and engagement to collaborate, develop credible solutions and deliver tangible benefits to Northern Ireland consumers, underpinned by our service standards. We are proud of our progress during this corporate plan period, covering April 2021 and December 2023:

Consumer outcomes		How we met these	
1	Ensure fair treatment and consumers getting value for money.	<ul> <li>30,265 Consumers helped</li> <li>7,344 Consumers signposted to partners</li> <li>22,921 Consumer enquiries and complaint investigations</li> <li>£1,039,097 Returned to consumer pockets</li> <li>37 Rgulatory price controls and tariff reviews</li> <li>223 Water bill checks</li> </ul>	
2	Work to improve the quality of products and services and enhance consumer confidence and trust.	<ul> <li>21 Accessibility audits</li> <li>11 Complaints handling audits</li> <li>60 Reviews of regulatory policies and standards</li> <li>29 Reviews of licence applications</li> <li>11 Consumer monitoring projects</li> <li>82 Consumer research projects</li> <li>73 Consumer interventions</li> </ul>	
3	Ensure the products and services consumers rely on are accessible, safe and secure.	<ul> <li>175 Consumer information campaigns</li> <li>34,051 Consumers reached through consumer rights outreach</li> <li>1,922 Consumers reached through financial services outreach</li> <li>882 Instances of consumer representation at forums, working groups and speaking engagements</li> <li>133 Regulatory and industry consultations</li> <li>1,528,818 Website visits including online tools</li> <li>2,946 Media engagements</li> </ul>	
4	Meet consumer needs and expectations of the Consumer Council.	<ul> <li>34% Growth of digital footprint</li> <li>54% Awareness of the Consumer Council</li> <li>99% Customer Satisfaction Score</li> <li>99 out of 100 Net Promoter Score</li> <li>Achieved ISO 22458 for Consumer</li> <li>Vulnerability with the BSI Kitemark</li> <li>Retained the Customer Service</li> <li>Excellence standard</li> <li>Achieved satisfactory audit opinion from DfE and the NI Audit Office</li> </ul>	

### Our accreditations and awards

Alongside this, we consistently strive to meet the highest possible standards.



## The strategic landscape

In developing our 2021-2026 Corporate Plan, we carried out a detailed analysis of our environment, structures and procedures. This helped us understand how to build on our past achievements and improve in areas where challenges remain.

We interviewed stakeholders from the utilities and advice sector, providers in financial services, post and transport, government departments and other consumer bodies. We asked them about the opportunities, risks and issues for consumers in the period ahead, what we had done well, how we could improve and what success should look like by the end of this corporate plan.

Their feedback matched our core purpose: to support, educate and protect consumers, in particular consumers in vulnerable circumstances, so they can overcome emerging challenges and plan for a better future. They acknowledged the Consumer Council as a fair and balanced consumer advocate, campaigning on their behalf, but with the need to build awareness and partnership working in the markets consumers were experiencing increased detriment.

Although we begin from a strong position, we recognise the significant challenges consumers will face over the period of this corporate plan. In such a rapidly shifting landscape, we must be innovative and resolute in delivering a better deal for consumers and rebuilding confidence, so they can overcome these challenges, build resilience and make the most of the opportunities this change will bring.

## **Consumer priorities**

Our 2021-2026 Corporate Plan now addresses four consumer priorities: the cost of living crisis, decarbonisation, the impact of EU Exit and digital inclusion.

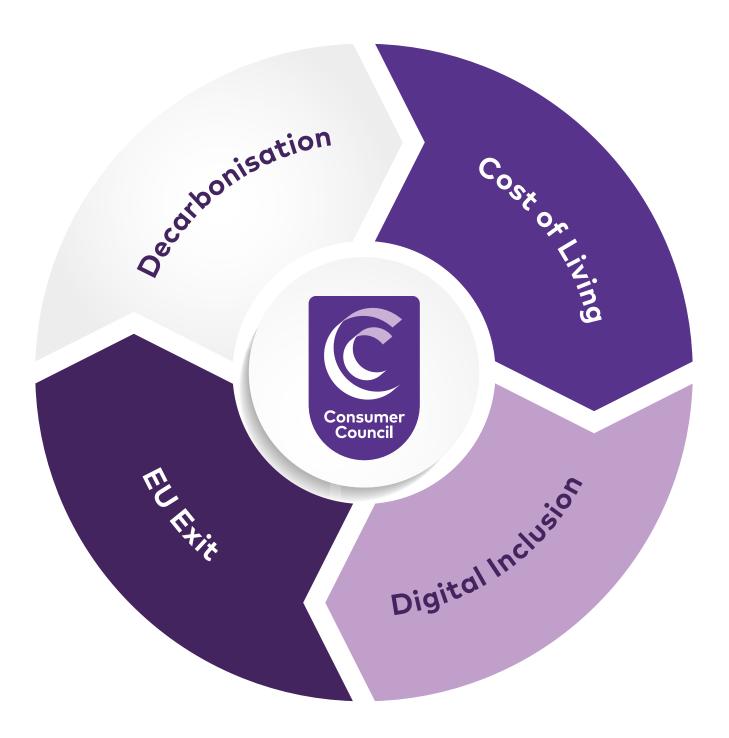
These are a little different from the priorities we launched in 2021, when we identified: recovery from the COVID-19 pandemic, the impact of EU Exit, decarbonisation and digitalisation. Since then, we have seen widening disparity in consumer experiences and accelerated detriment across many consumer groups.

In 2022, we replaced COVID-19 with helping consumers cope with the cost of living crisis as many more citizens struggled to make ends meet, accelerated by the end government support to mitigate the impacts of the pandemic, due to the cost of essential spending and UK inflation rising above 10% for the first time in 40 years.

The digitalisation of our economy is irrevocably changing consumer behaviour. In 2023, we replaced digitalisation with digital inclusion in recognition of the proliferation and complexity of these markets, as providers in financial services, transport, travel and telecommunications increasingly distribute their products and services using digital and data services.

Our stakeholders agree these are the right priorities, provided they are given the proportionate focus, and they reflect our ambition of delivering inclusive societal and economic value for all consumers, particularly those in vulnerable circumstances.

## **Our consumer priorities**



### **Cost of Living**

The COVID-19 pandemic was followed by the most significant cost of living crisis of recent times, driven by energy, fuel, and food inflation and leading to unprecedented increases in essential consumer spending.

It has accelerated disparities in consumer experiences and increased poverty. Most affected are the vulnerable and at risk groups in our society, in part due to their lower levels of discretionary income and financial resilience.

The fall in discretionary incomes due to the increased cost of essential spending and tax rises has overtaken most wage or benefit increases. This places undue burden on many citizens, particularly our lowest earning households who receive 71% of their income from social securities versus 60% in the UK. The reduction in living standards is mostly due to increases in the cost of housing, utilities, including electricity, gas and heating oil is used by two thirds of Northern Ireland households to heat their homes, and food and transport.

During 2021, Northern Ireland consumers experienced 18 separate price increases in electricity and seven separate price increases in gas. The average annual electricity bill from the regulated supplier was 66% higher in July 2022 when compared January 2021. In July 2022, the cost of home heating oil was on average 113% higher than a year ago and nearly double the ten-year average price. The situation is starker for gas consumers; the average annual regulated supplier gas bill in Greater Belfast increased by 165% between January 2021 and July 2022 while consumers in the Ten Towns area experienced more than three-fold increase in their cost of gas between January 2021 and July 2022.

Fuel prices have also significantly increased with petrol and diesel prices setting new records in 2022 which has led to increases in the cost of food production and distribution, resulting in increases to the end price of goods purchased by consumers. These upward pressures have led to high inflation rates, and in turn, the Bank of England has increased interest rates. As these factors have emerged consumers have also been contending with the transition to hybrid working brought on by a pandemic, which changed consumer behaviour and increased our dependency on digital markets.

If we are to successfully emerge from this crisis, it is critical for government, academia, industry and consumer bodies to coalesce to deliver targeted support to those who need it the most and create opportunities for all consumers.

## **EU Exit**

The UK formally left the EU on 31 January 2020 with the transition period for trade negotiations ending on 31 December 2020. The NI Protocol set out Northern Ireland's post-Brexit relationship with both the EU and Great Britain.

It is part of the EU-UK Withdrawal Agreement, the international treaty agreed between the EU and the UK, which regulates how the UK's exit from the EU should work. The NI Protocol came into force on 1 January 2021.

On 27 February 2023 after two years of negotiations the EU and the UK announced the Windsor Framework, a new set of arrangements designed to restore the smooth flow of trade within the UK internal market. These arrangements were further amended on 31 January 2024 with the publication of the Command Paper: 'Safeguarding the Union'.

As the Windsor Framework is operationalised, there may be impacts for consumers and it will be vital that we monitor how internal market arrangements are working for consumers particularly in areas where we have statutory remit such as food accessibility and post, including parcel movements. There continues to be a heightened risk of regulatory divergence in Northern Ireland which requires further detail, realistic timetables to scenario plan and prepare for potential impacts, and mitigate against any erosions to consumer rights, protections, accessibility and affordability.

The pandemic has enhanced reliance on e-commerce and this may increase consumers' exposure to any changes in how GB or EU businesses treat consumers in Northern Ireland. While it is not clear what the final guidance and processes will be on parcel movements, the Consumer Council will monitor the experiences of consumers, microbusinesses and small and medium sized enterprises (SMEs).

There are also likely to be changes arising from EU Exit on services including: potential changes to travelling with pets or service animals; charges for euro transactions using some debit cards; and changes to mobile roaming protections.

It is vital that future policy and legislation, and the resulting regulations and standards, safeguard against any erosion of consumer rights and protections.

## Decarbonisation

## There has been growing awareness and concern around the climate crisis, with more consumers purchasing sustainable products and services, and from businesses with environmental credentials.

We now have our Climate Change Act (Northern Ireland) 2022, and delivering a more competitive, inclusive and greener economy is one of five priorities in The Executive's Pathway to Recovery Framework and DfE's Economic Recovery Action Plan, accelerating work on climate action and decarbonisation to build a low-carbon society and economy.

This aligns with ambitious international and national strategies to decarbonise all sectors of the economy and reduce carbon emissions, including from buildings, transport, electricity and heating, with the least cost to the consumer. In parallel, the Energy Strategy for Northern Ireland, led by DfE, will promote the switch to clean energy, supports efficient energy use, encourages green innovation and progresses the decarbonisation of transport.

Influencing behaviour, consumption and affordability must be central to public policy. It is vital consumers can access trusted and independent advice, support and redress, so that they are confident about buying greener products and services. Equally, providers must make information about products and services easy to access and comprehend, and offer consumer-centric products and service, so consumers understand why and are prepared to change how they use energy.

There has been significant progress in energy supply, waste management and the residential sector in Northern Ireland, with transport the next priority. As providers work towards net-zero emissions, and scaling up the use of hydrogen power and renewable electricity infrastructure, government, regulators and consumer bodies must also work in partnership to deliver the necessary consumer protections.



## **Digital inclusion**

## The shift to digitalisation is transforming consumer expectations and access, but so too is the risk landscape and digital exclusion.

Digitalisation has empowered consumers to be better informed and more independent than ever before, and can offer greater choice and personalisation. However, during 2020, these changing consumer habits have had a significant and quantifiable impact on Northern Ireland's manufacturing, retail and service sectors and our town centres, all of which suffered during the COVID-19 pandemic.

Whilst benefits include greater flexibility, choice, speed and ease of access and convenience, this has led to the digital exclusion of certain consumers, such as those of pensionable age, with long term health conditions, on low incomes or living in rural areas. Government policies and providers must ensure consumers have equal access and opportunity, and the support to develop their digital skills.

Consumers are now more susceptible to scams, fraud, mis-selling and mis-buying. Many find it difficult to understand their rights, navigate digital markets or switch providers so they are not disadvantaged by loyalty penalties. Exacerbating this are complicated, legalistic or inadequate disclosures, platform incompatibility and concerns of algorithms manipulating consumer behaviour.

Government intervention is pushing for data-driven technologies and services to offer better solutions to improve consumer outcomes. This and data portability give more flexibility, control, and personalisation to consumers, with initiatives such as open banking, most likely to be replicated in energy and pensions, offering a single view of finances and making it easier to shop around.

Regulation and independent scrutiny must match the sheer pace of innovation in digital markets with public policy ensuring all citizens are included and protected. At a time when legislative divergence with the EU is likely, we need effective collaboration between governments, regulators, industry and consumer bodies to establish fair value, access, protection, competition and security.

## **Policy alignment**

We support the themes identified by The Executive and DfE to bring about sustainable recovery and achieve wellbeing across our society.

#### New Decade New Approach

Our statutory duties in energy, transport, water and sewerage, and food affordability and accessibility align with a number of priorities set out in The Executive's <u>New Decade New</u> Approach and draft Programme for Government (PfG) Outcomes Framework.

These include bringing about positive changes in areas that impact greatly on people's lives such as the economy, overcrowded hospitals, struggling schools, housing stress, welfare concerns and mental health, improving connectivity and sustainable transport.

There was a commitment to reform the Northern Ireland Civil Service and a review of arm's length bodies with which we will engage. We will explore how we can assist in delivering the PfG, where people and communities have an opportunity to shape through citizen engagement and co-design.

#### **Pathway to Recovery**

With the COVID-19 pandemic delaying the launch of the new PfG, The Executive's Pathway to Recovery provides the foundation for economic, health and societal renewal by placing citizens at the heart of the framework.

It has five interdependent pillars: health and wellbeing; inclusive economic recovery; public services; skills development; and sustainable natural and built environment. These will underpin a number of workstreams contributing to the outcomes of the new PfG.

The pillars look to the future, to how we move on and adapt to a different way of living and working, how we rebuild and restart public services as fully as possible, look to transform our health service and provide opportunities for businesses and citizens to survive and grow.

Our 2021-2026 Corporate Plan is written with this framework in mind, and we will support The Executive in delivering the resulting workstreams as they begin to take shape.

#### **PfG Outcomes Framework**

The PfG seeks to deliver lasting, real and positive change to people's lives. With work to develop a long term, multi-year strategic PfG now underway, The Executive's draft PfG Outcomes Framework sets out nine ambitious outcomes aimed at making a real and positive difference to people's lives.

- 1. Our children and young people have the best start in life.
- 2. We live and work sustainably protecting the environment.
- 3. We have an equal and inclusive society where everyone is valued and treated with respect.
- 4. We all enjoy long, healthy, active lives.
- 5. Everyone can reach their potential.
- 6. Our economy is globally competitive, regionally balanced and carbon-neutral.
- 7. Everyone feels safe we all respect the law and each other.
- 8. We have a caring society that supports people throughout their lives.
- 9. People want to live, work, and visit here.

Our strategic objectives are fully aligned to these outcomes.

The Executive is also leading the development of an integrated Recovery Plan to accelerate recovery in four areas: economic growth; tackling inequalities; health of the population; and green growth and sustainability. We will contribute to these recovery outcomes where appropriate, working in partnership so interventions are designed and implemented around the citizen.

#### Rebuilding a Stronger Economy and Economic Recovery Action Plan

The <u>Rebuilding a Stronger Economy</u> strategy from DfE sets out its priorities for delivering inclusive, regionally balanced economic recovery. Supporting this is the <u>Economic Recovery</u> <u>Action Plan</u>, detailing the themes and actions for promoting sustainable economic recovery.

Rebuilding consumer confidence must be a key outcome of all five cross cutting themes: a highly skilled and agile workforce; innovation; investment, trade and exports; a greener economy; and tourism. We will work to not only rebuild consumer confidence but also welfare, trust and resilience.

We recognise the substantial economic recovery opportunity in decarbonising energy and transport supply and use. We will work with DfE to balance investment and job creation with consumer access, affordability, availability and choice, as well as the necessary protections and measures to assist consumers in vulnerable circumstances. We will also support the ambitions of the <u>10X Economy</u> and the strategies that fall out of this on skills, energy and other economy drivers.

Alongside this, we are fully committed to working in partnership with DfE, stakeholders and consumers to deliver the <u>Energy Strategy - Path to Net Zero Energy</u> for Northern Ireland, which sets out a pathway for energy to 2030 that will mobilise the skills, technologies and behaviours needed to take to achieve The Executive's vision of net zero carbon and affordable energy by 2050.

#### **Climate Change Act**

Led by the Department of Agriculture, Environment and Rural Affairs (DAERA) on behalf of The Executive, the <u>Climate Change Act (Northern Ireland) 2022 (Act)</u> sets a target of an at least 100% reduction in net zero greenhouse gas emissions by 2050.

This includes 2030 targets at least 80% of electricity consumption from renewable sources (DfE) and 70% of waste is recycled (DAERA) and target for a minimum spend of 10% of overall transport budgets on active travel (DfI). These cut across our work in decarbonisation and we will support plans of The Executive and its lead Departments in meeting their targets.



## How we operate

## Our operating framework makes us an agile and flexible organisation, able to respond quickly to the changing consumer environment.

As we move forward, it reflects our ambition and shapes our direction, priorities, forward work programmes, management policies and recruitment.

## Vision, mission and values



Our values create and reinforce a strong organisational culture and identity by underpinning, guiding and shaping everything we do when putting consumers first.



They inspire our people, reassure our partners, help create a shared vision for the consumers of Northern Ireland and ensure we always reach for the highest standards.

## **Guiding principles**

We use a set of eight guiding principles, developed by the United Nations to:

- assess where the consumer interest lies; and
- develop and communicate our policies, interventions and support.

These provide an agreed framework through which we approach regulatory and policy work.



Access

Can people get the goods and services they need or want?



Choice

Is there any?



Safety

Are the goods or services dangerous to health, welfare or sustainability?



Information

Is it accessible, accurate and useful?



Fairness

Are some or all consumers unfairly discriminated against?



Representation

Do consumers have a say in how goods or services are provided?



Redress

If things go wrong, is there a system for making them right?



Education

Are consumers aware of their rights and responsibilities?

The principles ensure we apply a consistent approach across our statutory functions in energy, post, transport, water and sewerage, and food affordability and accessibility, and our non-statutory functions which can include any market from financial services and private car parks.

They serve and protect consumers and set out the minimum standards expected from markets when delivering products or services, including in digital markets, in Northern Ireland.

They frame our policy position and approach to resolving consumer disputes with industry, offering a straightforward checklist to analyse and validate outcomes, in particular amongst vulnerable groups.

## **Statutory provisions**

Under the General Consumer Council (Northern Ireland) Order 1984 (The Order), we have a duty to:

- Consider any complaint made to it relating to consumer affairs and, where it appears to the Consumer Council to be appropriate having regard to any other remedy which may be available to the complainant, investigate the complaint and take such further action in relation thereto as the Consumer Council may determine.
- Carry out, or assist in the carrying out of, inquiries and research into matters relating to consumer affairs.
- Promote discussion of, and the dissemination of information relating to, consumer affairs.
- Report to a Northern Ireland Department on any matter relating to consumer affairs, which is referred to the Consumer Council by that Department.

To make sure we can protect and empower consumers we have different legal powers and duties<sup>1</sup>. We get these powers from different pieces of legislation, licences given to companies so they can work in Northern Ireland, and cooperation agreements set in memorandums of understanding.

#### We can:

- Investigate complaints.
- Carry out research and investigate matters that impact consumers.
- Make super-complaints to the Competition and Markets Authority, or any other UK and Northern Ireland sector regulators.
- Provide information, advice and guidance to consumers, government and companies about consumer issues.
- Advise on market reform and challenge and change to how companies operate in Northern Ireland.
- Get information from government, regulators and companies so that we can do our job.

#### We must:

- Consult on and publish our annual forward work programmes.
- Pay particular attention to the issues and impacts of consumer vulnerability.
- Be consulted with by government and companies on issues affecting consumers in energy, post, transport, water and sewerage, and food affordability and accessibility.
- Make sure we are not duplicating the functions or doing the work of another public body.

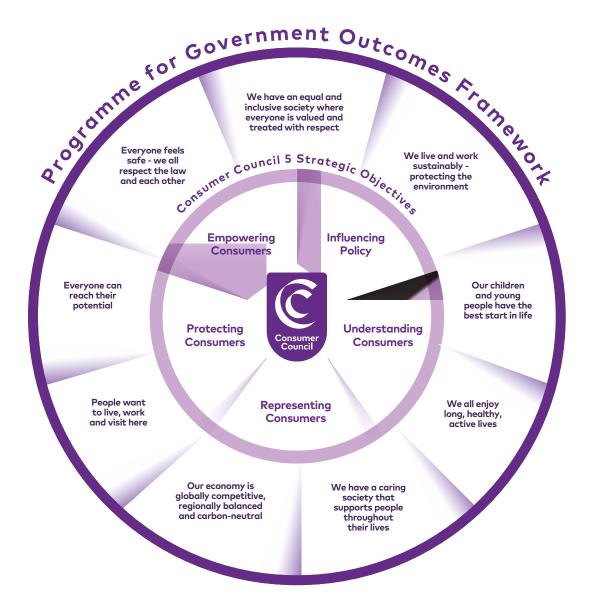
<sup>&</sup>lt;sup>1</sup>Details of our legal powers and duties is provided in Annex 1.

## **Strategic objectives**

To support the emerging consumer priorities and our guiding principles, we have identified five strategic objectives to define our work over the period of the 2021-2026 Corporate Plan and forward work programmes.

- understanding consumers;
- influencing policy;
- representing consumers;
- protecting consumers; and
- empowering consumers.

Each objective connects with and depends on the outcomes of the others, and collectively, they deliver positive impact for consumers and meet the draft PfG Outcomes Framework.



#### 2021-2026 Corporate Plan

We will understand consumers and their needs through our direct engagement, and the insights obtained from our research and outreach programmes.

We will use this evidence to develop ambitious interventions to deliver positive consumer outcomes aligned to The Executive's New Decade, New Approach and Pathway to Recovery Framework, and DfE's Rebuilding a Stronger Economy and Economic Recovery Action Plan.

In parallel, we will seek to make markets work in the interests of consumers by ensuring service providers, government, regulators and other key stakeholders reflect consumer needs when developing policies and delivering services.

## How we will achieve our objectives

## We are a trusted partner with a record for bringing about positive change in Northern Ireland.

We protect consumers; build consumer confidence, resilience and welfare; inform consumer policy, legislation and regulation; and educate consumers so they make informed choices.

To support the emerging consumer priorities and our guiding principles, we have five strategic objectives that underpin how we meet the consumer outcomes we strive to deliver.

#### Understanding consumers

#### Our aim

To understand the emerging risks, challenges and opportunities consumers in Northern Ireland are facing at a community, regional, national and international level.

#### We will

- Be an insight-led, evidence based organisation.
- Evaluate socio-economic trends that influence consumer behaviour and confidence.
- Review legislation and regulation to identify and mitigate consumer detriment within our vires.
- Develop comprehensive insights into the unique considerations affecting consumers.

#### We do so through

- Citizen and stakeholder consultations.
- Outreach and education programmes.
- Data and intelligence gathering.
- Bespoke research projects.
- Surveys and panels.

#### We deliver

Analysis of consumer issues with insights for the necessary protections, supported by recommendations for accessible and affordable solutions from industry and government.

#### Influencing policy

#### Our aim

To influence any public policy that affects Northern Ireland consumers, ensuring it meets their needs, safeguards protections, is citizen-focused and supports inclusive economic recovery.

#### We will

- Advise on regional and national policy informed by the issues affecting consumers here.
- Work with regulators to hold industry accountable to more transparent and affordable access.
- Ensure policy and regulation prioritise consumer affordability, confidence and welfare.
- Provide comprehensive evidence and insights to shape consumer policy.

#### We do so through

- Consultation responses.
- National and international forums.
- Committees, working groups and networks.
- Partner memorandums of understanding.
- Outcomes-led stakeholder relationships.

#### We deliver

Understanding of the challenges, risks and opportunities for consumers amongst regional and national policy makers across our statutory and non-statutory functions.

#### Representing consumers

#### Our aim

To be the trusted, independent voice of Northern Ireland consumers, particularly for those in vulnerable circumstances, through work to help them meet challenges and plan for their future.

#### We will

- Work with stakeholders and industry to improve service delivery to consumers.
- Support consumers to meet emerging priorities as the economy begins to recover.
- Advocate for accessible and affordable products and services for all consumers.
- Improve consumer engagement, satisfaction and advocacy.

We do so through	We deliver
<ul> <li>Price control consultations.</li> <li>Complaint and accessibility audits.</li> <li>Impact analysis and market reviews.</li> <li>Campaigns to reduce consumer vulnerability.</li> <li>Benchmarking reports.</li> </ul>	Clarity on the needs of consumers with affordable access to markets, products and services, and advocate for enhanced protections and support around consumer vulnerability.

#### Protecting consumers

#### Our aim

To put things right by offering impartial dispute resolution and signposting services and guidance on consumer rights, and work in partnership with civic society organisations to avoid duplication.

#### We will

- Advocate across consumer issues, highlighting areas of discrimination or detriment.
- Resolve consumer complaints by negotiating positive outcomes on their behalf with industry.
- Ensure essential public services offer accessible and affordable access to all consumers.
- Use research and policy analysis to highlight emerging areas of consumer detriment.

#### We do so through

- Dispute resolution.
- Consumer helpline on 0800 121 6022.
- Information and advice on consumer rights.
- Accredited complaint handling processes.
- Designated super-complaints body.

#### We deliver

Improved services and protections for all consumers through effective redress from industry, lobby for their rights, and supercomplaint investigations with regulators.

#### **Empowering consumers**

#### Our aim

To empower consumers by giving them information and advice about their rights and responsibilities, particularly given changing protections emerging from the strategic landscape.

#### We will

- Support consumers to make informed, confident and affordable buying choices.
- Work in partnership with stakeholders to develop information and tools for consumers.
- Encourage consumer protection within industry by informing them of their responsibilities.
- Develop education services about consumer rights and responsibilities.

<ul> <li>Guidance, comparison tools and advisory events.</li> <li>Community engagement with Consumer</li> <li>Higher levels of consumer confid welfare by using appropriate choice</li> </ul>	
<ul> <li>Champions.</li> <li>Partnerships to reduce consumer vulnerability.</li> <li>Outreach and education programmes.</li> <li>Digital footprint and engagement.</li> </ul>	hannels to

These strategic objectives collectively shape the impact we will deliver for Northern Ireland consumers over the corporate plan period. We will develop outcome-based performance measures that will underpin our corporate scorecard and annual targets.

## **Our ethos**

To protect and empower consumers in Northern Ireland we must be the best. We are a small organisation with limited resources playing a big role in Northern Ireland society and its economy.

In delivering our 2021-2026 Corporate Plan, we will focus on the following areas.



## Culture

We are recognised for outstanding employee engagement with Investors in People Gold, and are passionate about our people. They are at the heart of our success as they go to extraordinary lengths to offer support, champion issues, resolve problems and find solutions for consumers. They embody our values and we will strengthen our inclusive culture by investing in their capability, competency and connections.

We are committed to being an employer of choice, attracting and retaining the right people with the necessary expertise. We will support them to do the best job they can with continuous professional development and the right policies, practices, processes and technology. This ensures we help them build resilience and meet future challenges, and create an environment for them to grow and lead.

## Advocacy

We give consumers a voice by promoting and protecting their interests. We do so through statutory duties in energy, post, transport, water and sewerage, and food affordability and accessibility, and our non-statutory functions. We will seek out new duties in communications and digital services and other priority areas that emerge, following EU Exit and as economic recovery plans gain momentum.

We will increase our consumer research to provide The Executive, UK Government and stakeholders with comprehensive insights into the unique considerations affecting Northern Ireland consumers. This enables us to identify the current and most relevant issues and emerging risks, and advocate for policies and interventions that deliver the greatest value and impact for consumers.

## **Partnerships**

Representing 1.9 million people cannot happen in isolation. Given our cross-cutting remit, we will work in partnership with government, regulators, industry, consumer bodies, charities, elected representatives and other partners to deliver our objectives, interventions and outcomes. We will forge trusted relationships with new partners and leverage their connections and experience.

To avoid duplication, we will collaborate with our stakeholders and deploy our resources to make the greatest impact. Given the unique position Northern Ireland now occupies, we will represent the interests of our consumers by sharing insights, building knowledge and developing solutions through representation on regional, national and international networks, forums and committees.

### Strategic influencers

Globally, we face economic volatility, affecting many lives and livelihoods here in Northern Ireland. In the midst of significant uncertainty, the importance and value of our role in empowering consumers to make informed, responsible choices has grown considerably, reinforcing our national and international reputation. We will build on this success in close collaboration with our funders and stakeholders.

We will continue to actively influence and shape government policy, and the societal and economic impacts affecting Northern Ireland consumers. Recognised as the trusted voice of consumers, we will do so through our work with The Executive, UK Government, devolved administrations, the cross-government Consumer Protection Partnership and BEUC The European Consumer Organisation.

### Communication

Effective communication is key for the Consumer Council, and we recognise this is a fastmoving space. We will evolve the way we work to better understand consumers and changing behaviours. We will grow our awareness, reach and engagement by identifying the most effective channels and leveraging digital innovation, without excluding consumers in vulnerable circumstances.

We will expand our outreach partnerships with like-minded organisations who share our goal of creating a fair and equal society. We will establish a network of Consumer Champions to connect with consumers in their communities, offering advice, tools and signposting on a range of issues, and strengthen our understanding of the grassroots issues affecting consumers at a sub-regional level.

## Funding

Over half our unique funding model is allocated to statutory duties, drawn from levies collected by The Executive and UK Government Departments. We prioritise supporting, educating and protecting consumers in these areas, meeting the highest standards of public accountability and corporate governance. This allows us to be agile in how we adjust our spending should circumstances change.

We are mindful of the significant challenges to public sector finances. To meet our future ambitions, we will use our resources effectively and identify potential mechanisms for revenue generation. We will use this to fund and deliver best practice research into the unique considerations affecting Northern Ireland consumers, so government policy and intervention reflect these insights.

## **Sustainability**

We take full ownership of the societal and environmental impact our business decisions have on the wider environment. As a member of Business in the Community, we are working towards Core Accreditation, which focuses on: planet, people, place and core business. Through this process, we have identified areas for improvement and will address these over the corporate plan period.

We want to be exemplar in how we develop our people and adopt business practices that are ethical and environmentally sustainable. We will learn from others, encourage staff to share skills and knowledge, and embed relevant policies and practices within the organisation and with our staff. This will ensure we actively contribute to wider society and minimise our environmental impact.

### **Delivering value**

Much of our work focuses on the social value experienced by consumers. Measuring this is important because it tells the story of the positive change we bring about, and quantifies our impact and return on investment from the perspective of consumers. This also provides the necessary assurances to our funders and stakeholders so they can continue to invest in the vital work we do.

Eight consumer protection principles developed by the United Nations already guide our work. These are supported by various ISO standards, including ISO 22458 for Consumer Vulnerability with the BSI Kitemark. We will also develop a framework to measure the social value and nonmonetary impacts of our work across multiple policy areas.

## **Governance and reporting**

## For nearly 40 years, the Consumer Council has brought about positive change to benefit the consumers of Northern Ireland. This longevity is only possible because of our continued relevance and efficacy.

We are an open, transparent, agile and accountable organisation that seeks the highest standards of public accountability and independent scrutiny, validated by the Northern Ireland Audit Office, DfE and independent accreditations and awards.

### Monitoring, evaluation and reporting

Our Board, appointed by the Economy Minister, provides expert and effective oversight. Working with the Chief Executive and Senior Leadership Team, they critically examine our operational activity, covering how we:

- Educate and protect consumers, and support them to deal with complaints where other avenues of redress have failed.
- Provide policy makers, regulators and industry with a representative and authoritative view on the needs of Northern Ireland consumers.
- Work with The Executive, UK Government, devolved administrations and stakeholders to actively influence and shape government policy and consumer outcomes.
- Manage our resources and governance standards to ensure we deliver against current and emerging requirements, and determine what is realistic and attainable.
- Evaluate our impartiality, efficiency and effectiveness through customer and stakeholder feedback, project evaluations and employee engagement.
- Report performance and return on investment, so intended outcomes and annual forward work programmes support the vision, mission and strategic objectives of the organisation.

This ensures we fulfil our statutory duties and maintain alignment between our 2021-2026 Corporate Plan and DfE's Rebuilding a Stronger Economy and Economic Recovery Action Plan, The Executive's Pathway to Recovery Framework, and other regional and national policies.



## **Governance framework**

We are a non-departmental public body (NDPB) operating under the Management Services and Regulation Group of DfE, on behalf of The Executive.

Our relationship is governed by our Management Statement and Financial Memorandum (MSFM), which will be replaced by a Partnership Agreement during the life of this corporate plan. This sets out the functions, powers and duties of the Consumer Council, the Board and its board sub-committees.

It underpins the ambition of our 2021-2026 Corporate Plan and supporting forward work programmes. Supporting this are policies, procedures and business plans that set out actions we will take to deliver against our strategic priorities, and performance measures to track and report on progress.

We provide regular reports on progress against our corporate plan, on operating targets, and on the outcomes we deliver on behalf of consumers and stakeholders. This includes updates at cross-departmental governance committees covering budgetary responsibilities and risk management.

We are committed to continuous improvement. We learn from and share our success and our progress, as well as our mistakes, with DfE, our funders and our stakeholders. Our governance arrangements are reported in the Annual Reports and Accounts.

### **Equality considerations**

We are committed to promoting equality of opportunity and good relations.

The policies and interventions outlined in this corporate plan are subject to equality screening, and if appropriate, full equality impact assessments (EQIA) as outlined in Section 75 of the Northern Ireland Act 1998.

We support diversity and inclusion. We operate in an increasingly diverse society and the people who provide and use our services have diverse characteristics and different experiences, needs and aspirations. Understanding and valuing these differences can result in greater participation.

It will help bring about success at an individual, team and organisational level. We are committed to creating an inclusive working environment where individual differences are valued and respected, and in which each employee is able to fulfil their potential and maximise their contribution.

## **Annex 1: Legal powers and duties**

The Consumer Council was established in April 1985 through the General Consumer Council (Northern Ireland) Order 1984 (The Order). Our principal statutory duty is to protect the interests of consumers in Northern Ireland by empowering them and providing a strong representative voice to policy makers, regulators and service providers.

To ensure we can protect and empower consumers we have different legal powers and duties. We get these powers from legislation, licences given to companies so they can work in Northern Ireland, and cooperation agreements set in memorandums of understanding.

In accordance with The Order, the Consumer Council's main duties are to:

- Consider any complaint made to it relating to consumer affairs and, where it appears to the Consumer Council to be appropriate, having regard to any other remedy which may be available to the complainant, investigate the complaint and take such further action in relation thereto as the Consumer Council may determine.
- Carry out, or assist in the carrying out of, inquiries and research into matters relating to consumer affairs.
- Promote discussion of, and the dissemination of information relating to, consumer affairs.
- Report to a Northern Ireland Department on any matter relating to consumer affairs which is referred to the Consumer Council by that Department.

Our statutory functions cover energy, post, transport, water and sewerage, and food affordability and accessibility, and non-statutory functions educate and empower consumers against unfair or discriminatory practices in any market. Across both, we pay particular regard to consumers:

- who are disabled or chronically sick;
- who are of pensionable age;
- who are on low incomes; and
- who live in rural areas.

We have responsibilities under the Rural Needs Act 2016 and Section 75 of the Northern Ireland Act 1998. In this role, we aim to ensure government policies recognise consumer needs in rural areas, and promote equality of opportunity and good relations across a range of equality categories.

### **Consumer empowerment**

With regard to consumer empowerment, The Order gives us powers to: undertake enquiries; investigate complaints under our statutory functions; promote and disseminate any information related to consumer affairs in order to educate and empower consumers; undertake independent consumer research; and report to a Northern Ireland Department on any matter relating to consumer affairs.

## **EU Exit**

With regard to EU Exit, our interpretation of The Order gives us powers to monitor and report on the real and perceived impacts for consumers in light of Northern Ireland's unique position of being in the UK customs territory with access to the EU single market for goods. It also allows us to educate and empower consumers to understand how any changes might affect them and what actions they need to take.

## Energy

With regard to energy, alongside our interpretation of The Order giving us powers to undertake enquiries, complaints, promote information and undertake research, the Energy (Northern Ireland) Order 2003 legislates for the Consumer Council to:

- Investigate consumer complaints.
- Represent the views of consumers.
- Make proposals and provide advice and information on consumer matters.
- Obtain and keep under review information about consumer issues and the views of consumers on these issues, including research into gas and electricity consumer issues.
- Publish information in the consumer interest.

Our work in energy is also supported by the following legislation:

- The Electricity (Northern Ireland) Order 1992 covering the quality of service, complaint handling and billing disputes of electricity suppliers.
- The Gas (Northern Ireland) Order 1996 covering billing disputes of gas suppliers.
- Energy Act (Northern Ireland) 2011 covering complaints about gas suppliers and their performance.

## **Financial services**

With regard to financial services, our interpretation of The Order gives us powers to tackle financial exclusion in Northern Ireland by working with The Executive, UK Government and regulators to influence policy and empower consumers through education and increased awareness.

Our funding from HMT gives us a specific remit in relation to the issue of illegal money lending. Part 20B of The Bank of England and Financial Services Act 2016 states that HMT may give financial assistance for the purpose of taking action against illegal money lending. Our work in this area is focused on research, education and awareness, and the development of access to alternative forms of credit to reduce financial exclusion.

### Food affordability and accessibility

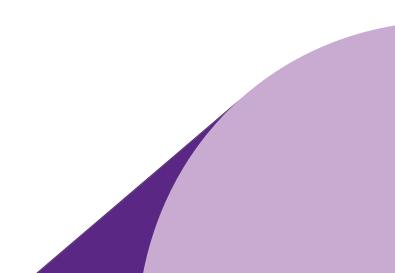
The Order gives us powers to research and report on the issues or barriers Northern Ireland consumers might face in order to access affordable, good, nutritious and enjoyable food, of an appropriate quality and quantity, to sustain an acceptable standard of living appropriate for all.

The Order also gives us powers to consider, report to and respond to consultations from respond to the consultations from DAERA when and where appropriate for us to do so. Food accessibility and affordability cuts across the four consumer priorities identified in the 2021-2026 Corporate Plan.

### **Postal services**

With regard to postal services, alongside our interpretation of The Order giving us powers to undertake enquiries, complaints, promote information and undertake research, the Consumer, Estate Agents and Redress (CEAR) Act 2007 and the Office of Communication's regulatory conditions for Royal Mail as the universal service provider provides us with statutory responsibility for representing postal consumers in Northern Ireland.

Our work focuses on carrying out research, influencing policy, providing advice and information, and investigating complaints made by consumers in vulnerable circumstances, and gives us information gathering and investigation powers to help fulfil this statutory function. Our investigation powers also include issues relating to the number and location of post offices across Northern Ireland.



## Transport

With regard to transport, The Order gives us powers to make recommendations on any matter affecting road or railway passenger transport services and facilities in Northern Ireland, and services and facilities for passengers travelling to and from Northern Ireland.

This remit has been extended through further legislation and by formal agreement with regulators, with a Memorandum of Understanding with Dfl recognising the Consumer Council's role as set out in the Transport Acts and Consumer Orders.

The Transport Act 2011 also requires that in deciding whether to issue or refuse a private bus operators permit or to attach conditions to a permit, Dfl shall have regard to any recommendations made by the Consumer Council.

The Airports (Northern Ireland) Order 1994 requires airports to provide adequate facilities for consultation with the Consumer Council (as a member of the Airport Users Committee) in respect to any matter concerning the management or administration of the airport which affects consumer interests. The Consumer Council is also required to be consulted on any matter relating to consumer affairs under the Taxis Act (Northern Ireland) 2008.

The Rail Passengers Rights and Obligations (Designation and Enforcement) Regulations (Northern Ireland) 2017, legislates for the Consumer Council as the designated body for the purpose of Article 30(2) of Regulation 1371/2007, to which any passenger may submit a complaint about an alleged contravention of the Regulation.

We are the designated complaints handling body for EU Regulation 1107/2006, (rights of disabled passengers), EC 261/2004 (cancelled or delayed flights) and EU Regulation EC 1177/2010 (maritime passenger rights), which have been transposed into UK law.

### Water

With regard to water, alongside our interpretation of The Order giving us powers to undertake enquiries, complaints, promote information and undertake research.

The Water and Sewerage Services (Northern Ireland) Order 2006 and Northern Ireland Water's Operating Licence legislates for the Consumer Council to investigate complaints on behalf of domestic and business users, give advice on both consumer and business interests, gather and publish information, and be consulted with by Northern Ireland Water and government on any matter relating to consumer affairs.

## Super-complaints

We are a designated super-complaints body under the Enterprise Act 2002 and the Financial Services and Markets Act 2013. Under both Acts, the Consumer Council can, if we believe any feature of a market in the United Kingdom (UK) is, or appears to be, significantly harming the interests of consumers, raise a super-complaint to the relevant UK or Northern Ireland regulator.

In addition, under the Gas and Electricity Licence Modification and Appeals Regulations (Northern Ireland) 2015, we can make an appeal to the Competition and Markets Authority if we believe a modification by the Utility Regulator to the licence of a gas or electricity provider is detrimental to the interests of consumers.



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