

# 2022-2023 Forward Work Programme Consultation

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# CONTENTS

1.	RES	PONDING TO THE CONSULTATION
2.	INT	RODUCTION
2	.1	About the Consumer Council
2	.2	The last 12 months
3.	SET	TING THE CONTEXT
3	.1	The four consumer priorities8
3	.2	Our guiding principles9
3	.3	Our five strategic objectives10
4.	FOR	WARD WORK PROGRAMME14
4	.1	Understanding consumers14
4	.2	Influencing policy
4	.3	Representing consumers
4	.4	Protecting consumers
4	.5	Empowering consumers
5.	RES	OURCING OUR PROGRAMME23
5	.1	Our ethos
5	.2	How will we do it
5	.3	Equality considerations
6.	DEL	IVERING IMPACT
6	.1	Programme for Government Outcomes Framework
6	.2	Developing our performance measures
7.	CON	ITACT US

# **1. RESPONDING TO THE CONSULTATION**

This 2022-2023 Forward Work Programme sets out the activity and performance framework the Consumer Council proposes to deliver in the second year of the 2021-2024 Corporate Plan, underpinned by consumer priorities and strategic objectives.

We are seeking your views and comments to help shape the development of our work. This is an important part of the process to ensure our proposals are relevant to the issues that matter most to consumers in Northern Ireland.

To download a copy of our 2021-2024 Corporate Plan, please visit: www.consumercouncil.org.uk/corporateplan

## **Questions to consider**

We would welcome your feedback on the following questions:

- 1. Have we captured the right consumer priorities for the next 12 months?
- 2. Have we identified the right strategic objectives to address these consumer priorities? Are there some more important than others, or if there is anything we have missed.
- 3. Do you agree with the overall direction and project focus of the 2022-2023 Forward Work Programme?
- 4. Are there any changes you think we should make to the overall direction and project focus of the 2022-2023 Forward Work Programme?
- 5. Do you have any other comments that would help guide our work on our 2022-2023 Forward Work Programme?

## **Duration and briefings**

The consultation will open for four weeks from Monday 21 February 2022. It will close at 5.00pm on Friday 18 March 2022.

We will host a virtual briefing on Thursday 10 March 2022, starting at 11.00am and lasting approximately one and a half hours. We will talk through our proposed plans and there will be the opportunity to discuss our 2022-2023 Forward Work Programme with our Senior Leadership Team.

To attend, please register your details at: www.consumercouncil.org.uk/forwardworkprogramme

## Submitting your response

When responding, please state whether you are responding as an individual or representing the views of an organisation. If the latter, please also state the organisation you are representing and your contact details, should we need to seek clarification.

You can submit your feedback in writing to <u>corporateplan@consumercouncil.org.uk</u> or complete our online feedback form at <u>www.consumercouncil.org.uk/FWP2022-2023</u> by 5.00pm on Friday 18 March 2022.

Please do make time to complete the consultation and encourage others to do the same. We look forward to hearing from you.

## **Alternative formats**

If you require a paper copy of the 2022-2023 Forward Work Programme, or one in an alternative format including Braille or in a minority language to meet the needs of those whose first language is not English, then please contact:

Communications Team The Consumer Council Floor 3 Seatem House 28-32 Alfred Street Belfast BT2 8EN

E-mail: <u>corporateplan@consumercouncil.org.uk</u> Telephone: 028 9025 1600

#### After the consultation

Our Board and Senior Leadership Team will review consultation responses.

After reviewing the consultation responses, we will publish, subject to final approval from the Department for the Economy, our 2022-2023 Forward Work Programme in April 2022.

We may make responses to this consultation public. If you do not wish your response or name to be made public, please state this clearly by marking the response as confidential and outline your reasons as to why your response should be treated as confidential.

#### **Data protection**

We will handle your data in compliance with applicable laws including the General Data Protection Regulation and Data Protection Act 2018. For further details on our data handling practices please see the <u>Consumer Council Privacy Notice</u>.

# **2. INTRODUCTION**

The Consumer Council was established in April 1985 as a non-departmental public body (NDPB) under the General Consumer Council (Northern Ireland) Order 1984 (The Order).

We are committed to ensuring positive outcomes for consumers in Northern Ireland. Our principal statutory duty is to safeguard their interests and we operate under our sponsor department, the Department for the Economy, on behalf of the Northern Ireland Executive.

To ensure we protect consumers, we have a range of legal powers and duties, drawn from legislation, licences given to companies working in Northern Ireland, and cooperation agreements set in memorandums of understanding. The work we carry out also aligns with a number of the Articles in the Protocol of Ireland and Northern Ireland (NI Protocol).

## 2.1 About the Consumer Council

We are passionate about championing consumer interests and we put them at the heart of everything we do. As the consumer representative body of Northern Ireland, we are responsible for ensuring 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.

We have statutory functions in relation to consumer affairs, energy, postal services, transport, water and sewerage, and food accessibility. Our non-statutory functions educate, empower and support consumers against discriminatory practices in any market, from financial services through to food affordability and private parking charge notices.

We are the trusted, independent voice of Northern Ireland consumers. We achieve this by responding to enquiries, providing expert advice, investigating complaints, conducting independent research, advocating across consumer issues, delivering information campaigns, collaborating, influencing public policy, and advising government on matters of consumer rights and protection.

In everything we do, we prioritise 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.

## Super-complaints

We are a designated super-complaints 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 is, or appears to be, significantly harming the interests of consumers, raise a super-complaint on behalf of consumers to the following 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
- Northern Ireland 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.

## 2.2 The last 12 months

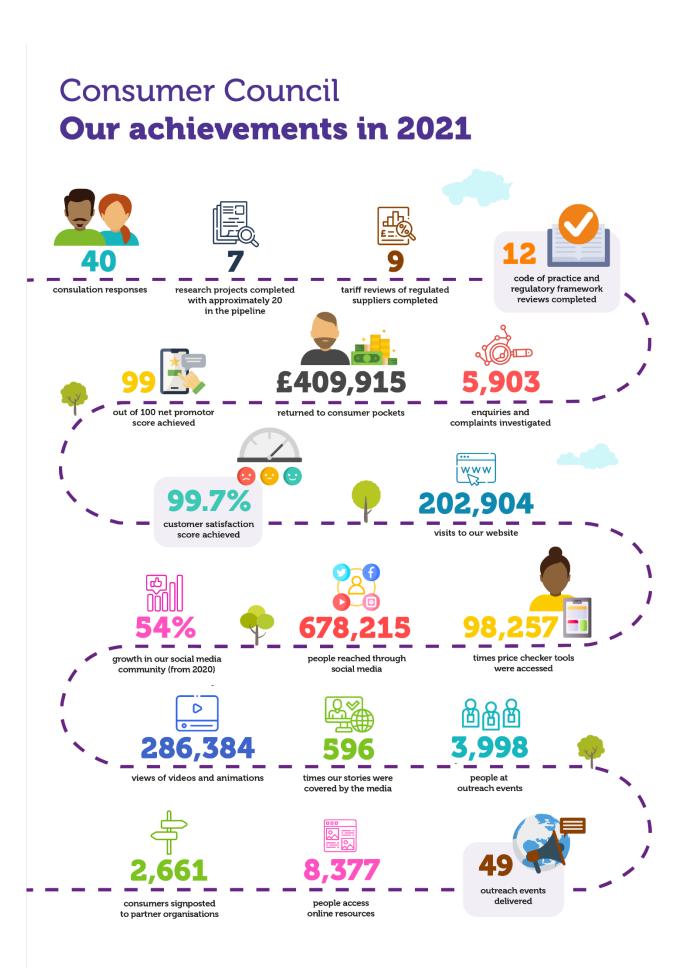
2021 began with a sharp focus on responding to the COVID-19 pandemic followed by the end of the post-Brexit transition period between the United Kingdom and European Union.

Our priorities were to adapt as an organisation, keep our staff safe, engaged and motivated, and serve and support the interests of consumers in Northern Ireland through these extraordinary times, while providing assurance to our Board, the Department for the Economy, funders and stakeholders.

We were ambitious in our plans and targets in order to deliver on behalf of the citizens of Northern Ireland, building their confidence and resilience while supporting inclusive economic recovery.

# **Our accreditations**





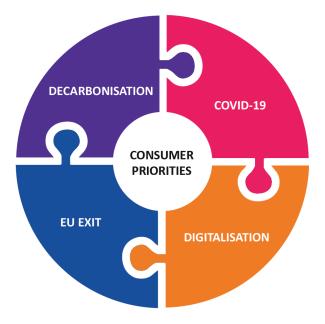
#### SETTING THE CONTEXT

We support the outcomes identified by Northern Ireland Executive in their draft Programme for Government and <u>New Decade New Approach</u> to bring about sustainable recovery and achieve wellbeing across our society, alongside a number of supporting strategies including the <u>Energy</u> <u>Strategy - Path to Net Zero Energy</u> and <u>10x Economy</u>.

## 2.3 The four consumer priorities

We understand consumers and their needs through our direct engagement, the insights obtained from our research and outreach programmes, and extensive ongoing engagement with stakeholders from government, academia, the advice sector, wider public sector and business community.

Using this evidence, we built our Corporate Plan 2021-2024 to address four consumer priorities: COVID-19, EU Exit, decarbonisation and digitalisation. In parallel, we sought 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.



Despite the challenges we have experienced in the last 12 months, and will continue to experience, we believe addressing these remain most important to consumers in Northern Ireland.

They underpin our core purpose: to support, educate and protect them so they can overcome emerging challenges and plan for a better future. This is echoed by our stakeholders who agree they reflect our ambition of delivering inclusive societal and economic value.

We recognise the legislative reform that will be taken forward by the Northern Ireland Executive and UK Government on competition and consumer policy, including protections in digital markets and the transition to net zero, and the impact this can have on consumer behaviours and confidence.

We will continue to conduct research, analyse and gather evidence and utilise intelligence on how well consumers and the Northern Ireland economy can respond to these reforms, now and beyond pandemic, and advocate on behalf of consumers, particularly those in vulnerable circumstances.

#### COVID-19

The impact of COVID-19 on our economy and consumer detriment is inextricably linked. It brought unparalleled disruption to our lives and livelihoods, exacerbating structural and societal inequalities.

As we emerge from the pandemic and governments prioritise regionally-balanced economic recovery, changing labour markets, shifts in consumer behaviour and rising costs mean disparity of consumer experiences and increased poverty. Most affected are the vulnerable in our society with low-paid and part-time workers continuing to face uncertainty over their future employment.

## **EU Exit**

The NI Protocol and corresponding grace periods continue to dominate political debate and media coverage, with clear impacts for consumers on how they work, live and do business.

Market access and supply chain disruption was coupled with criticism of the UK Government and European Commission handling of negotiations, impacting on businesses and communities. Future policy and legislation, and resulting regulations and standards, must safeguard against erosions to consumer rights, protections, accessibility and affordability, mindful of concerns from civic society.

#### Decarbonisation

Delivering a more competitive, inclusive and greener economy has accelerated Northern Ireland's pathway to net zero energy by 2050 through the <u>Energy Strategy</u> and proposed <u>Climate Change Bill</u>.

Achieving net zero emissions through a just and fair energy transition is essential for long term consumer protection, with education and empowerment critical to helping citizens through their changing energy future. Influencing consumer behaviour, consumption and affordability must also be prioritised, underpinned by access to trusted and independent advice, support and redress.

#### Digitalisation

The shift to digitalisation, accelerated by the pandemic, is transforming consumer expectations and access, and amplifying the risk landscape and digital exclusion for many of our citizens.

The digitalisation of our economy is irrevocably changing consumer behaviour. Benefits include greater flexibility, choice, speed and ease of access and convenience, but this has led to the exclusion of consumers in vulnerable circumstances. Regulation and independent scrutiny must match the pace of innovation, with public policy ensuring all citizens are included and protected.

## 2.4 Our guiding principles

We use a set of eight guiding principles, developed by the United Nations to assess where the consumer interest lies, and to develop and communicate our policies, interventions and support.

The principles provide an agreed framework through which we approach regulatory and policy work and ensure we apply a consistent approach across our statutory and non-statutory functions, and in all our engagement with consumers and stakeholders.



They serve to protect consumers, setting out the minimum standards expected from markets when delivering products or services in Northern Ireland. They frame our policy position and approach to addressing emerging detriment, including in digital markets, and resolving consumer disputes with industry, offering a straightforward checklist to analyse and validate outcomes, in particular amongst vulnerable groups.

## 2.5 Our five strategic objectives

To support the emerging consumer priorities and our guiding principles, we have identified five strategic objectives: understanding consumers; influencing policy; representing consumers; protecting consumers; and empowering consumers.

Through these, we:

- Protect consumers.
- Build consumer confidence, resilience and welfare.
- Inform consumer policy, legislation and regulation.
- Educate consumers so they make informed choices.

## 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	We deliver
<ul> <li>Consultation responses.</li> <li>National and international forums.</li> <li>Committees, working groups and networks.</li> <li>Partner memorandums of understanding.</li> <li>Outcomes-led stakeholder relationships.</li> </ul>	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

- Price control consultations.
- Complaint and accessibility audits.
- Impact analysis and market reviews.
- Campaigns to reduce consumer vulnerability.
- Benchmarking reports.

## We deliver

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 the advice sector 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 super-complaint 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.

We do so through	We deliver
<ul> <li>Guidance, comparison tools and advisory events.</li> <li>Community engagement with Consumer Champions.</li> <li>Partnerships to reduce consumer vulnerability.</li> <li>Outreach and education programmes.</li> <li>Digital footprint and engagement.</li> </ul>	Higher levels of consumer confidence and welfare by using appropriate channels to educate all consumers about their rights and responsibilities.

# **3. FORWARD WORK PROGRAMME**

In the second year of our three-year Corporate Plan 2021-2024, we have identified the following projects and thematic outcomes, to meet consumer priorities and strategic objectives.

We will continually monitor our external environment, through our ongoing response to the COVID-19 pandemic and the impact of EU Exit on Northern Ireland consumers, and optimise and adjust our plans accordingly. We will also work collaboratively with stakeholders to sharing our insights and research on consumer impacts and detriment on an ongoing basis.

## **4.1 Understanding consumers**

Team	Theme	Description	Timing
Consumer Empowerment	Research   Insight	Undertake the 2023 Consumer Insight Survey analysing macro consumer issues across Northern Ireland by measuring sentiment, detriment, vulnerability and behaviours, supported by quarterly Pulse Surveys that help to identify emerging risks and issues.	All year
Consumer Empowerment	Research   Insight	Develop a Consumer Detriment Index for Northern Ireland looking at detriment levels inform across priority sectors with a view to informing policy development in relation to consumer vulnerability and inclusion.	All year
Consumer Empowerment	Research   Insight	Develop a Social Return on Investment Framework to measure the social value and non- monetary impacts of our work across multiple policy areas aligned to the Programme for Government Outcomes Framework.	All year
Energy	Research   Insight	Explore the experience and attitudes of home heating oil customers and gather evidence of consumer spending patterns, potential issues, and comparisons with the Republic of Ireland and Great Britain markets.	All year
Energy	Research   Insight	Quantitative and qualitative research into the knowledge and awareness of Northern Ireland consumers regarding the prevalence of greenwashing, and secondary analysis to assess its impact. Stakeholders will be briefed on research findings and recommendations.	All year
Energy	Research   Insight	Quantitative and qualitative research into impact of the energy price crisis on energy affordability for Northern Ireland consumers.	By end Q2

Energy	Research   Insight	Annual assessment of consumer attitudes to the energy transition and renewable technologies building on research undertaken during 2021-2022. This will provide evidence of consumer attitudes to inform policy and will have a representative focus on consumers in vulnerable circumstances and those living in rural areas. Stakeholders will be briefed on research findings and recommendations.	All year
Energy	Research   Insight	In partnership with the Department for the Economy, following the launch of the Energy Strategy Action Plan, carry out research into the opportunities, costs, and social impacts of energy transition on Northern Ireland consumers.	By end Q4
Energy	Research   Insight	In partnership with the Utility Regulator, issue a call for evidence on the protection measures necessary for consumers during energy decarbonisation, and procure support for evidence gathering from stakeholders and to deepen our understanding of best practice in other jurisdictions.	By end Q4
Transport	Research   Insight	Investigate attitudes to specific policy initiatives aimed at decarbonising transport, with a representative focus on consumers in vulnerable circumstances and living in rural areas. Stakeholders will be briefed on research findings and recommendations.	By end Q2
Transport	Research   Insight	Scoping of a model for transport decarbonisation information and advice. This project will draw on insights from best practice and consider options and their feasibility. Stakeholders will be briefed on research findings and recommendations.	By end Q4
Water	Research   Insight	Carry out user experience research to better understand consumers' daily household water use by means of observational techniques, task analysis, and/or other feedback methodologies.	By end Q4
EU Exit	Research   Insight	Investigate the cost of mobile roaming to the Northern Ireland consumer in multiple markets, and the resulting consumer detriment. This will be supported by an awareness campaign and online guidance for consumers.	Q1   Q2
EU Exit	Research   Insight	Bi-annual quantitative and qualitative research reports on the impact of EU Exit on Northern Ireland consumers, supported by stakeholder briefings on research findings and recommendations. This will inform the development of online content and guides to help educate and empower consumers make informed decisions.	Q2   Q4
EU Exit	Research   Insight	Creation of a Consumer Monitor dashboard for Northern Ireland, covering the range of consumer data and insights across policy areas, EU Exit and cost of living impacts. This will be supported by bi-annual reports and stakeholder briefings.	Q2   Q4

EU Exit   Financial Services	Research   Insight	Quarterly reports, supported by bi-annual stakeholder briefings, into consumer affordability on the impact on discretionary incomes following the COVID-19 pandemic with analysis by age, main income source, tenure and gender.	Quarterly
EU Exit   Food	Consultation   Review	Quarterly Food Focus Groups, with supporting reports, to provide in-depth exploration of key and emerging issues relating to food accessibility and affordability, supported by stakeholder briefings.	Quarterly
EU Exit   Food	Research   Insight	Quarterly reports, supported by bi-annual stakeholder briefings, of the first experimental Northern Ireland Consumer Price Index in partnership with the Office of National Statistics, to measure consumer price inflation by tracking the weighted average prices of a basket of consumer goods and services. This will be used to assess changes to the cost of living in Northern Ireland, and inform the UK Government's target for inflation.	Quarterly
EU Exit   Postal Services	Research   Insight	Quarterly research on the impact of EU Exit on consumers and micro and small businesses in Northern Ireland in terms of postal services and distribution networks, supported by stakeholder briefings, and identify emerging and structural issues.	Quarterly
Financial Services	Research   Insight	Understand the impact on consumers of the reduction/withdrawal of high cost credit providers in Northern Ireland on the availability of credit.	By end Q3
Transport	Research   Insight	Undertake research into international best practice in the use, and integration of, technology in transport services. Stakeholders will be briefed on research findings and recommendations.	By end Q4

# 4.2 Influencing policy

Team	Theme	Description	Timing
All Teams	Partnership   Representation	Advocate for building accessibility, affordability and inclusion for Northern Ireland consumers, with a view to strengthening confidence and resilience, through membership at key forums and working groups with stakeholders including government, regulators, academia, consumer advocacy bodies and industry.	All year
Energy	Partnership   Representation	To work with key stakeholders to encourage the development of a Government Fuel Poverty Strategy that builds upon existing policies and delivers recommendations to reduce fuel poverty numbers.	All year

	Contribute evidence from our consumer research to the development and roll out of the	
Research   Insight	Department for the Economy Energy Strategy, ensuring Northern Ireland consumer	All year
	interests are at the centre of the design and delivery of the decarbonisation roadmap.	
Dartnarshin	Chair Northern Ireland's Consumer Vulnerability Working Group to positively influence	
	the support measures available to energy, water, and transport consumers in vulnerable	All year
Representation	circumstances and to promote collaboration and evidence gathering.	
Desta subtral	Identify operational and policy issues arising from our consumer research and consumer	
	complaints and use industry forums, media opportunities, and stakeholder engagement	All year
Representation	to encourage companies to promptly and effectively address them.	
	Assess the current and emerging risks to consumer access, in particular those in	
Research   Insight	vulnerable circumstances, to postal services through the Post Office Network in Northern	By end Q3
	Ireland.	
Consultation   Review	Review approximately 25 applications for new and renewed licences from private bus	A.U
	operators to ensure consumer interests and needs are met.	All year
Consultation   Review	Work in partnership with the Department for Infrastructure and Translink to develop a	
	Translink Public Service Agreement and a new Passenger Monitoring Contract and	April 2022
	Passenger Charter, reflecting current and emerging consumer priorities.	
	Work in partnership with the Department for Infrastructure, NI Water and other water	
Consultation   Review	stakeholders during the review of Northern Ireland's Long Term Water Strategy to ensure	All year
Consultation	Respond to the Water Resource Supply and Resilience Plan consultation, ensuring	
Review	demand side measures adopted align to consumer research.	Q4
Desta subtral		
Partnership   Representation		All year
	Regional Community Resilience Group.	
	Consultation   Review Consultation   Review Consultation   Review Consultation   Review Partnership	Research   InsightDepartment for the Economy Energy Strategy, ensuring Northern Ireland consumer interests are at the centre of the design and delivery of the decarbonisation roadmap.Partnership   RepresentationChair Northern Ireland's Consumer Vulnerability Working Group to positively influence the support measures available to energy, water, and transport consumers in vulnerable circumstances and to promote collaboration and evidence gathering.Partnership   RepresentationIdentify operational and policy issues arising from our consumer research and consumer complaints and use industry forums, media opportunities, and stakeholder engagement to encourage companies to promptly and effectively address them.Research   InsightAssess the current and emerging risks to consumer access, in particular those in vulnerable circumstances, to postal services through the Post Office Network in Northern Ireland.Consultation   ReviewReview approximately 25 applications for new and renewed licences from private bus operators to ensure consumer interests and needs are met.Consultation   ReviewWork in partnership with the Department for Infrastructure and Translink to develop a Translink Public Service Agreement and a new Passenger Monitoring Contract and Passenger Charter, reflecting current and emerging consumer priorities.Consultation   ReviewWork in partnership with the Department for Infrastructure, NI Water and other water stakeholders during the review of Northern Ireland's Long Term Water Strategy to ensure consumer needs remain central to its ambition and delivery.Consultation   ReviewRespond to the Water Resource Supply and Resilience Plan consultation, ensuring demand side measures adopted align to consumer research.C

# 4.3 Representing consumers

Team	Theme	Description	Timing
All Teams	Consultation	Across consumer affairs, energy, water, transport, financial services, postal services and	All year
All reallis	Review	EU Exit, respond to government, regulatory and sector specific consultations, calls for	All year

		evidence and market reviews in order to advocate for and represent the interests of	
		Northern Ireland consumers, in particular those in vulnerable circumstances.	
	Consultation	Represent consumer interests, having particular regard to those in vulnerable	
All Teams	Review	circumstances, by reviewing industry codes of practice and responding appropriately to	All year
	Neview	relevant consultations and calls for evidence.	
		Represent consumers at a range of industry forums, ensuring their views, interests and	
All Teams	Partnership	experiences are taken into account by government, regulators, academia, consumer	All year
Air reams	Representation	advocacy bodies and industry, across energy, water, transport, financial services, postal	
		services and EU Exit.	
		Across consumer affairs, energy, water, transport, financial services, postal services and	
All Teams	Partnership	EU Exit, deliver an annual programme of stakeholder engagement to build awareness	All year
Air reams	Representation	and understanding of the impacts and lived experiences of Northern Ireland consumers,	
		and advocate and influence for policy changes that benefit them.	
	Consultation	Represent consumers during the GD23, SPC23 and RP7 energy price control processes to	
Energy	Review	ensure decisions relating to business operations, finances and service provision are taken	All year
		in the best interest of consumers.	
	Consultation   Review	Represent consumer interests in the tariff reviews for the regulated companies in the	
Energy		Ten Towns and Belfast natural gas supply markets and the Northern Ireland electricity	All year
LICIBY		supply market to ensure consumer bills fairly reflect input costs, price changes are	
		communicated appropriately, and protections are in place for vulnerable consumers.	
	Consultation   Review	Work in partnership with the Department for the Economy and the Utility Regulator to	
Energy		ensure consumer interests, particularly those of vulnerable consumers, are reflected	All year
	I COLOW	when considering tariff reforms required to facilitate the energy transition.	
	Partnership	Work in partnership with the Competition and Markets Authority to analyse the 2021-	
EU Exit	Representation	2022 research into the impact of scams on consumers in Northern Ireland, and inform	Q3
	Representation	future areas of mutual interest and scope where consumer detriment exist.	
		Work in partnership with the Department of Agriculture, Environment and Rural Affairs	
EU Exit   Food	Partnership	to contribute to the Northern Ireland Food Strategy and represent consumers in the	Q2   Q4
	Representation	areas of food affordability and accessibility highlighting concerns and behavioural insights	α <u>ε</u>   α <del>1</del>
		at the Food Programme Board.	
Postal Services	Partnership	Continue to work with the Consumer Protection Partnership on the issue of parcel	All year
r Ustal Selvices	Representation	surcharging which affects Northern Ireland consumers.	All year

Postal Services	Partnership   Representation	Work with the other UK consumer advocacy bodies, Citizens Advice (England and Wales) and the new statutory consumer body for Scotland to identify the emerging issues that affect postal consumers and to respond appropriately.	All year
Transport	Consultation   Review	Work in partnership with the Department for Infrastructure and Translink to ensure evidence arising from our consumer interest's research is taken into account during the Translink Fare Review.	All year
Transport	Consultation   Review	Work in partnership with the Department for Infrastructure and industry to ensure evidence arising from our consumer interest's research is taken into account during the Taxi Maximum Fare Review and at the Taxi Forum.	All year
Water	Consultation   Review	Undertake an annual review of Northern Ireland Water tariffs and charges and make recommendations to ensure equitable charging policies.	August 2022 to February 2023

# 4.4 Protecting consumers

Team	Theme	Description	Timing
Consumer Empowerment	Partnership   Representation	Support Northern Ireland consumers and citizens with free independent advice, signposting information, and redress and complaints investigations across statutory functions, and provide regular updates on thematic issues.	All year
Energy	Partnership   Representation	Survey domestic consumers on their satisfaction, trust and confidence with energy suppliers, and make recommendations for improvements to policies and procedures.	All year
Energy   Transport   Water	Consultation   Review	Review consumer complaint data regarding energy, transport and water companies to assess the causes of complaints and use this evidence to make recommendations to industry regarding process and policy improvements.	All year
EU Exit	Partnership   Representation	Work in partnership with key partners including the Department for the Economy, Trading Standards, Office for Product Safety Standards and BEUC, the European Consumer Organisation, to understand any potential divergence of regulations and standards following EU Exit, and the impact on consumer protections.	Q4
EU Exit   Energy	Partnership   Representation	Work in partnership with the Competition and Markets Authority to promote the Green Claims Code to Northern Ireland consumers so they can make informed decisions, and establish a process for reporting breaches.	Q1
Financial Services	Education   Advocacy	Deliver the True Cost campaign to consumers, promoting awareness of alternative forms of credit and free to use advice services for those in financial difficulty.	All year

		Adviserte for portionation in the Na interact Loop Caborne (NULC) advises (or similar) with	
Financial Services	Education   Advocacy	Advocate for participation in the No interest Loan Scheme (NILS) scheme (or similar) with	All year
		the Department for Communities and Fair4All finance, and support work in development	
		of Northern Ireland alternatives to Breathing Space and other initiatives.	
Financial Services	Education	Continue to support the development of work on the Child Benefit Linked lending	All year
	Advocacy	schemes, subject to the recommendations of research undertaken in 2021-2022.	
	Partnership   Representation	Assess the new postal market regulatory framework and lobby the regulator with	
Postal Services		evidence of consumer detriment to ensure the Universal Postal Service is affordable to all	All year
rusial services		consumers and that regulation provides adequate protection and support for consumers	
		especially those in vulnerable circumstances.	
Postal Services	Partnership	Advocate for better designed online platforms for consumers buying parcel services using	On going
	Representation	our Best Practice Guide developed in collaboration with consumers.	
	Partnership   Representation	With insight gained from our stakeholder engagement, work with other UK consumer	All year
		advocacy bodies, Citizens Advice (England and Wales) and the new statutory consumer	
Postal Services		body for Scotland to secure solutions that work for all consumers across the UK so	
		marginalised consumers have safe and secure access to postal services.	
	Consultation   Review	Work in partnership with Translink to undertake three audits of transport operators	
Transport		accessibility and one of its complaints services with a view to improving the service	By end Q4
		provided to consumers, in particular those in vulnerable circumstances.	, .
Water	Consultation   Review	Work in partnership with Northern Ireland Water to audit the organisations' policies and	All year
		review its contact handling protocols and procedures, making recommendations for	
		improvements that will benefit consumers.	
Water	Consultation   Review	Work in partnership with Northern Ireland Water to ensure operational delivery of PC21	
		price control targets are consumer focused and activities are evidenced by consumer	All year
		insight.	
Water	Partnership   Representation	Review Northern Ireland Water's Customer Care Register, and propose improvements in	
		line with their PC21 price control social and environmental guidance and the Utility	All year
		Regulator's Consumer Protection Programme Best Practice Framework.	
		Regulator a consumer reflection regiumine best ructice rumework.	

# 4.5 Empowering consumers

Team	Theme	Description	Timing
Consumer Empowerment	Education   Advocacy	Promoting the services offered by our Energy, Water, and Transport Teams, including advice, signposting information and investigations.	All year
Linpowerment	Auvolacy		
Consumer Empowerment	Education   Advocacy	Across consumer affairs, energy, water, transport, financial services, postal services and EU Exit, deliver thematic and seasonal campaigns with partners, supported by thought-leadership on emerging issues and detriment, to provide advice that builds consumer confidence so they can make informed decisions.	All year
Consumer Empowerment	Education   Advocacy	Deliver an annual schedule of outreach events with Northern Ireland consumers, with a particular focus on harder to reach audiences, consumers in vulnerable circumstances and those in rural areas, supported by a presence at key consumer events such as the Balmoral Show and Holiday World.	All year
Consumer Empowerment	Education   Advocacy	Launch a new Consumer Council website that supports the consumer journey and meets their expectations, needs and accessibility standards.	Q3   Q4
Consumer Empowerment	Education   Advocacy	Grow the size, reach and engagement of the Consumer Council's digital footprint across all consumer and stakeholder groups, leveraging digital innovation where possible.	All year
Consumer Empowerment	Education   Advocacy	Develop printed and digital promotional materials, resources and tools on consumer rights and areas of consumer interest, with a particular focus on harder to reach audiences, consumers in vulnerable circumstances and those in rural areas.	All year
Consumer Empowerment	Education   Advocacy	Extend the annual Consumer Week programme into a quarterly schedule of events, talks, interviews, roundtables and webinars, supported by a multi-channel campaign aimed at increasing awareness of consumer rights, the role of the Consumer Council and the services it offers Northern Ireland consumers.	All year
Consumer Empowerment	Education   Advocacy	Develop a programme to build a network of consumer champions to increase reach and engagement with communities and individuals, for example young consumers through stakeholders in education, academia and government.	All year
Consumer Empowerment	Education   Advocacy	Strengthen relationship with the ScamwiseNI Partnership and government to seek ways to further the Consumer Council's input and involvement in protecting consumers in online environments.	All year

Consumer Empowerment	Education   Advocacy	Strengthen stakeholder relationships at a regional, national and international level to better represent the Northern Ireland consumer voice and interests, and improve understanding of the challenges and considerations in their lived experiences.	All year
Energy   Consumer Empowerment	Consumer awareness	Increase consumer awareness and understanding around the dangers and costs of energy theft through an awareness campaign in partnership with industry, Utility Regulator, UK Regulators Network and the Police Service of Northern Ireland.	All year
Energy   Consumer Empowerment	Education   Advocacy	Deliver an energy efficiency campaign, supported by online training for domestic energy users, in partnership with the energy industry and third sectors organisations.	All year
Energy   Consumer Empowerment	Education   Advocacy	Promote the benefits of renewable energy and low carbon equipment through awareness campaigns aimed at increasing consumer understanding.	All year
Energy   Consumer Empowerment   Transport	Education   Advocacy	Maintain and develop online guides, budgeting advice, and price comparison tools relating to electricity, natural gas, home heating oil, petrol and diesel. Undertake campaigns to build awareness of these resources.	All year
Financial Services	Education   Advocacy	Roll out of primary and secondary school materials on Safer Borrowing, following a successful in 2021-2022.	All year
Financial Services	Education   Advocacy	Extend Train the Trainer model through programmes with: (i) the Housing Manager programme with Northern Ireland Independent Federation of Housing Associations (NIIFHA) and Northern Ireland Housing Executive (NIHE), and (ii) signposting services with the Trussell Trust and other foodbanks.	December 2022
Financial Services	Partnership   Representation	Extend the Open College Network for Northern Ireland (OCNNI) Safer Finances programme to the community sector to reach key consumer groups and increase uptake of the OCNNI accredited training.	All year
Water	Consumer affordability	Deliver 80 on-site water use health checks, to assist small businesses to improve their water efficiency and ensure they are being accurately billed. Provide educational information on water efficiency to 1,200 businesses.	All year
Water	Consumer affordability	Develop two new partnerships with District Councils to provide them with information and support relating to water saving measures.	All year

# 4. RESOURCING OUR PROGRAMME

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

## 4.1 Our ethos

In delivering our 2022-2023 Forward Work Programme, we will focus on the following:



## Culture

We are passionate about our people. They are at the heart of our success and go to extraordinary lengths to offer support, champion issues, resolve problems and find solutions. They embody our values and we will strengthen our inclusive culture by investing in their capability, competency and connections, as recognised by Customer Service Excellence, Investors in People and Best Companies.

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 Northern Ireland Executive, UK Government and stakeholders with comprehensive insights into 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 1.8 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 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, fora and committees.

#### **Strategic influencers**

We face continued economic volatility, affecting many lives and livelihoods here in Northern Ireland. In the midst of this uncertainty, the importance and value of our role in empowering consumers to make informed, responsible choices has grown considerably, reinforcing our 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 Northern Ireland 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 fast-moving 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 Northern Ireland Executive and UK Government. We prioritise supporting, educating and protecting consumers in these areas, meeting the highest standards of public accountability and corporate governance. This makes us agile as we can adjust spending should circumstances change.

We are mindful of the significant challenges to public sector finances over the next three years. 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 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 and the British Standard for Inclusive Service Provision for identifying and responding to consumer vulnerability. We will also develop a framework to measure the social value and non-monetary impacts of our work across multiple policy areas.

## 4.2 How will we do it

Our funding for the next 12 months will be confirmed following this consultation as part of the annual budget exercise and spending review. This will shape our final list of projects for 2022-2023.

We will resource our 2022-2023 Forward Work Programme through our teams of committed staff and ongoing funding from the Department for the Economy, the Department for Infrastructure, the Department for Business, Energy and Industrial Strategy and HM Treasury.

Our relationship with our sponsor department, Department for the Economy, is governed by a Partnership Agreement setting out the functions, powers and duties of the Consumer Council, our Board and its sub-committees. Supporting this are policies, plans and performance measures that set out how we deliver against our strategic priorities and monitor progress.

We provide regular reports on progress including updates at cross-departmental governance committees covering budgetary responsibilities and risk management. Our governance arrangements are reported in the Annual Reports and Accounts. As Accounting Officer, the Chief Executive is responsible for safeguarding our public funding, for ensuring propriety and regularity of this funding, and the day-to-day operations and management of the Consumer Council.

We are committed to continuous improvement. We learn from and share our success and our progress, as well as our mistakes, with our sponsor department, funders and stakeholders. We will also continue to invest in our digital and cyber security infrastructure, and improve our information management and customer relationship management systems to increase efficiency, resilience, responsiveness and hybrid working capability.

Throughout the year, we will:

- Review operational plans to ensure we deliver efficiently, effectively and proportionately, and always through the lens of our statutory and non-statutory functions.
- Regularly monitor and assess our capability and capacity against consumer and stakeholder demand to ensure we meet consumer priorities and strategic objectives.
- Apply proportionate financial controls to our resources to meet governance standards and deliver value for money.

## 4.3 Equality considerations

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

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.

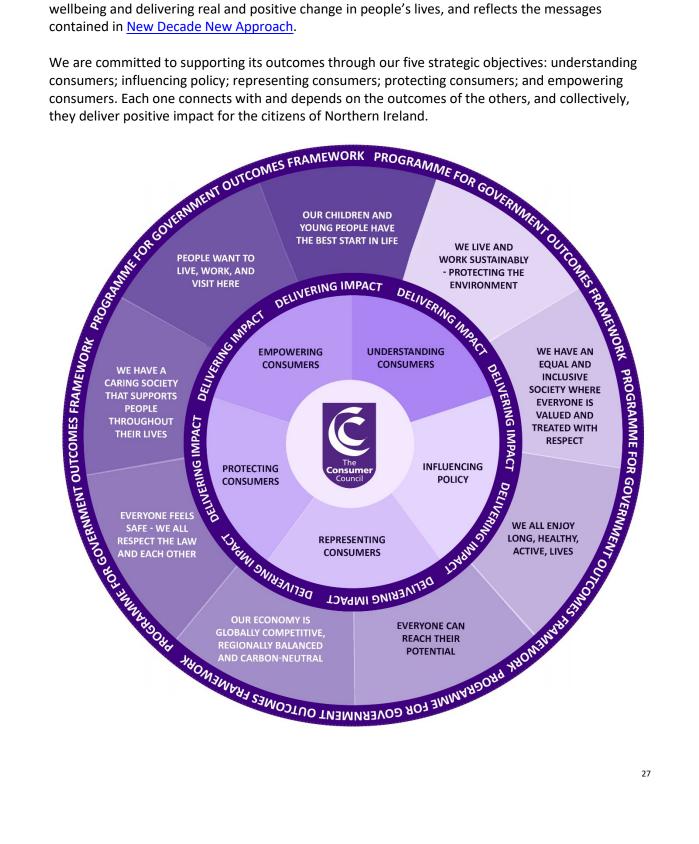
# 5. DELIVERING IMPACT

In developing our 2022-2023 Forward Work Programme, we prioritised the most relevant consumer issues, guided by our strategic priorities, statutory and non-statutory functions, and the draft Programme for Government and supporting strategies.

## **5.1 Programme for Government Outcomes Framework**

The Programme for Government Outcomes Framework focuses on achieving outcomes of societal wellbeing and delivering real and positive change in people's lives, and reflects the messages contained in New Decade New Approach.

We are committed to supporting its outcomes through our five strategic objectives: understanding consumers; influencing policy; representing consumers; protecting consumers; and empowering consumers. Each one connects with and depends on the outcomes of the others, and collectively, they deliver positive impact for the citizens of Northern Ireland.



## 5.2 Developing our performance measures

Following the consultation, we will develop a set of key performance measures with our sponsor department, the Department for the Economy. These set out how we track and report on progress in achieving our 2022-2023 Forward Work Programme and the supporting operational plans.

They will form the foundation of our annual corporate scorecard and risk register, and set out the framework we will use to demonstrate progress against each of our five strategic priorities, provide a clear account of the impact we make, and highlight how our delivery contributes to Northern Ireland's sustainable economic recovery and future growth.

This will only tell part of our story. Engagement and collaboration with partners, organisations and individuals with the aim of coalescing to support and protect Northern Ireland consumers in multiple markets and across current and emerging detriment, and understand them better, is equally important to advocate and further consumer interests in order to deliver the societal and economic change we seek to achieve.

We will also continue to capture data and evidence, including from our frontline services, on the impact of our work in order to refine and improve our approach, so we learn from our experiences and better serve Northern Ireland consumers and our stakeholders to public benefit.

# 6. CONTACT US

If you would like to discuss our 2022-2023 Forward Work Programme please contact us.

E: <a href="mailto:coporateplan@consumercouncil.org.uk">coporateplan@consumercouncil.org.uk</a>

T: 028 9025 1600

We hope we have made the consultation process as easy as possible. If you have any suggestions on how we can improve this, please share them with us at the above email address.