



The Consumer Council

Business leadership in consumer protection

The Consumer Council's response to the OFT's discussion document on self regulation and industry-led compliance.

May 2009

BUSINESS LEADERSHIP IN CONSUMER PROTECTION

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1. INTRODUCTION

The General Consumer Council for Northern Ireland (The Consumer Council) welcomes the opportunity to respond to the OFT's discussion paper on business leadership in consumer protection.

Our legislative role is to make the consumer voice heard and to make it count. Set up by statute in 1985 as a Non-Departmental Public Body, the Consumer Council's role is to promote and safeguard the interests of all consumers in Northern Ireland.

The Consumer Council has specific legislative responsibilities for energy (including natural gas, electricity and coal), passenger transport, food and we became the consumer representative body for water and sewerage services from April 2007.

The Consumer Council carries out research and investigations to identify key consumer concerns, to provide evidence where change is needed, lobby Government and key decision makers and to campaign for a fair deal for consumers, particularly the vulnerable.

Educating consumers forms a vital part of our work and we have developed strong links with schools, colleges, youth organisations, the community and voluntary sector, essential skills tutors and the business sector in order to raise people's awareness of their consumer rights and responsibilities; where to go for expert consumer advice and also to boost skills that enable consumers to deal confidently with issues such as complaints about faulty goods or poor service.

2. THE CONSUMER COUNCIL'S RESPONSE

2.1 The Consumer Council is generally supportive of the OFT's assertion that there is good cause to consider greater use of self regulation to address consumer protection issues in markets aimed at improving consumer protection and achieving compliance with consumer law or going beyond what the law requires. To summarise, we agree that self regulation:

- Enables industry to feed-in expertise and market specific insight so that they become part of the solution when problems arise and that this is likely to generate greater buy-in and commitment towards a sustained drive for improvements;
- Can be used to address business practices in particular sectors that have been linked to consumer detriment;
- Facilitates a more flexible, speedy and less resource intensive route aimed at solving specific problems that occur now and helps anticipate emerging issues;
- Helps to make quality more observable; and
- Provides consumers with a method for recognising reputable businesses.

2.2 Given the nature and focus of our work, the Consumer Council's response will address specific issues about raising business and consumer awareness of consumer law, best practice in customer care and strengthening systems of redress.

3. ALIGNMENT OF CONSUMER AND BUSINESS INTERESTS

3.1 In the OFT's economics document that accompanies the discussion paper about industry-led compliance, reference is made to the need for business to align their interests with consumers for a self-regulatory approach to work.

- 3.2 Motivation for businesses to provide first rate goods and services, customer care, complaints handling procedures and systems of redress might come from a principled approach – after all, people working in business are consumers too and know how they like to be treated themselves, or from a financial viewpoint where customer dissatisfaction can result in loss of repeat business and poor reputation. Whatever the motivation, it is possible to see how and where interests can and should be aligned.
- 3.4 This is particularly the case now that we are in a period of economic uncertainty. The challenge facing the delivery of consumer education and skills is that consumers often lack the stimulus to find out about their rights until they experience a problem with goods or services.
- 3.5 However, the current economic climate has resulted in a significant rise in the number of requests the Consumer Council receive from community and voluntary groups asking for leaflets, resource packs, attendance at exhibitions and delivery of presentations aimed at raising groups' awareness of their consumer rights and improving money management skills.
- 3.6 Anecdotal evidence from consumers gained through these activities suggest that as money becomes tighter and job prospects are less certain, people are less willing to take risks with where and what they buy.
- 3.7 As the OFT discussion paper explains, the upfront investment required for businesses to enter into self regulatory schemes can act as a disincentive. However, as consumers appear to be increasingly choosy, cautious and more 'promiscuous'¹ about where they shop, any scheme that can improve a business's reputation and their ability to deliver high quality goods, services and customer care will be worth it in the long-term.

¹ Donald McFetridge, Retail Analyst at the University of Ulster, quote taken from Northern Ireland News http://www.4ni.co.uk/northern_ireland_news.asp?id=45061

- 3.8 Also, as our latest consumer proficiency research², (see Section 5), shows consumers are becoming better informed about their rights and more confident in expressing these. Businesses will therefore need to raise their game if they want to meet customer expectations and the Consumer Council believes that self regulation does offer a route towards raising standards across certain market areas where a self regulatory approach fits.
- 3.9 With the right level of support, training *and* commitment, businesses can dramatically improve their customer care, complaint handling and systems of redress with relatively low financial investment.
- 3.10 The protection of deposits and pre-payments is another big issue for consumers, particularly in the current economic climate. The Consumer Council has serious concerns about the lack of protection offered to consumers when they have paid money into savings schemes or paid for goods in advance and the company then goes bust. The collapse of Farepak³ caused detriment to consumers on a huge scale and when Zavvi and Principles went bust, customers lost out when they could not redeem gift vouchers.
- 3.11 The Consumer Council recommends that OFT do more to further address the protection of deposits or prepayments, (as per CCAS Criterion 3j).
- 3.12 To help address consumers' concerns, the Consumer Council is currently developing a leaflet publication which offers tips on protecting deposits and payments into savings schemes against the threat of businesses going bust or entering into insolvency.

² Well, what do consumers know now? A Consumer Council Progress Report on Consumer Proficiency 2003 – 2007, March 2008

³ 1,200 local people lost nearly £500,000

4. CONSUMER LAW AND CUSTOMER CARE EDUCATION AND SKILLS FOR BUSINESS

- 4.1 The Consumer Council recommends that consumer education and customer care training take a more prominent role within the model of self-regulatory components. Under present arrangements, 'Advice and Training', as it appears in the 'Toolkit' branch of the model, focuses mainly on guidance supporting the scheme to encourage adherence to the rules, and then only as compliance issues arise.
- 4.2 The Consumer Council would prefer a more pre-emptive approach which sees staff training provided at the earliest opportunity to instil a sound understanding of consumer law and best practice in relation to customer care.
- 4.3 The Consumer Council recommends that greater priority be given to educating businesses and raising their awareness of consumer protection legislation, best practice in customer care and complaint handling. This is especially important for 'frontline' staff who need to be empowered to deal confidently and consistently with problems as and when they arise. Failure to empower frontline staff can lead to unnecessary delays in resolving complaints and added frustration for consumers whilst their complaint is escalated.
- 4.4 Over-reliance on specialist business support to deal with consumer disputes can also mean that individual businesses and staff fail to learn from the valuable market intelligence that complaints often provide and the opportunity to act swiftly to prevent a similar problem occurring again. We note that CCAS recommends publishing the results of performance indicators, eg mystery shopping exercises and independent audits, and an annual report that looks at the numbers and types of complaints, but this is no substitute for an immediate response in instances of goods or service failure.

4.5 Research undertaken by the Consumer Council in 2004⁴ found that many businesses (around one in three) in Northern Ireland do not provide staff training in customer care, consumer rights, complaint handling and in raising staff awareness of the particular needs of vulnerable consumers, for example people with a disability or from an ethnic and/or minority group. As a result, there was a significant degree of confusion and misunderstanding among businesses on many aspects of consumer law, contract law, consumer credit and the sale and supply of goods and services in general.

4.6 The Consumer Council expressed concern at BERR's proposal in the Consumer Law Review, August 2008, to implement a light touch approach or reduced levels of routine enforcement with respect to businesses which are perceived to be 'responsible'. Our experience shows that while a company's head office may be familiar with consumer protection legislation, it does not necessarily follow that staff working 'on the shop floor' are aware of their legal obligations towards consumers.

4.7 It was also apparent that businesses' awareness of consumer protection organisations and agencies is poor which means they are under-utilising these as a source of advice, support and possible dispute resolution. They were also unsure as to whether there was a specific body dealing with complaints for their industry or were uncertain as to which body it might be. Consequently, just over half (53 per cent) of all businesses were not referring consumers to the appropriate body.

4.8 The Consumer Council recommends that in addition to exploring the potential for further self regulation arrangements which involve consumer organisations, representatives, enforcement and advisory services in the operation and monitoring of the code, (CCAS Criterion 2c and 4b); that OFT and its key partners raise awareness among non-code holders of existing sources of advice and support.

⁴ Consumer Knowledge Business Report, 2004

4.9 Our 2004 Business Report concluded that standards of service could be improved and put forward a number of recommendations aimed specifically at supporting businesses in raising their awareness of consumer law and best practice in terms of customer care.

4.10 Subsequent research carried out in 2007⁵ shows that some positive outcomes had been achieved:

- Standards had improved. The number of consumers who felt they had reason to complain in the previous year fell from 39 per cent in 2003 to 31 per cent in 2007.
- Disappointingly however, the numbers satisfied with the way their complaint was dealt with fell from 66 per cent in 2003 to 59 per cent in 2007.

4.11 Without further research it is difficult to pinpoint the reasons for this. It might be due to unfounded or unrealistic expectations on the part of some consumers but it could equally indicate that businesses are unable or unwilling to meet consumers' expectations about what constitutes good customer care.

4.12 The research also found that while all businesses need to develop their awareness of and compliance with consumer law and raise customer care standards, this applies particularly to smaller and medium sized businesses who are, on balance, less 'consumer proficient' than larger businesses.

4.13 This presents a challenge as; on the whole, larger businesses have the capacity in terms of staffing and resources to appoint personnel who can gain a better understanding of compliance issues through training and roll this out across their workforce. This is where self regulation can offer a

⁵ Well, what do consumers know now? A Consumer Council Progress Report on Consumer Proficiency, March 2008

solution by bringing together a number of SMEs within an industry sector to facilitate the sharing of resources.

4.14 However, there will obviously continue to be a need for high quality guidance and materials to assist with the development and delivery of consumer law and customer care training. The guidance and training materials could have dual purpose in informing/educating businesses that fall under a self-regulatory scheme and those who do not but who still need to comply with consumer law.

4.15 The guidance produced by OFT and BERR relating to the Consumer Protection from Unfair Trading Regulations 2008 provide a good example of how complex information can be presented in a way that is accessible and easily digested.

4.16 The Consumer Council has developed factsheets, activities and scenario discussion cards that we use in Consumer Law and Customer Care training seminars for businesses that can then be re-used for staff induction and refresher courses. These have proved popular with retailers including IKEA, Marks & Spencers, Debenhams, Homebase, House of Fraser and smaller local businesses.

5. CREATING INFORMED, CONFIDENT CONSUMERS

5.1 The Consumer Council recognises the value of the Consumer Codes Approval Scheme (CCAS), the Local Authority Assured Trader Scheme Network (LAATSN) and Buy With Confidence (BWC) in raising consumers awareness of what constitutes best practice in customer care and the role this plays in helping consumers to make informed decisions and avoid rogue traders. However, as these schemes have relatively low market coverage and it is unlikely that all industry sectors will suit or adopt a self-regulatory approach, consumer education and skills will need to have sustained support and resourcing.

5.2 The Consumer Council strongly recommends that Government, consumer protection organisations, regulators and education stakeholders work together to deliver education initiatives aimed at empowering consumers.

These should be developed to suit a variety of audiences including:

- schools and colleges;
- youth sector;
- adult learners;
- community and voluntary groups; and
- business and retail, as mentioned previously.

5.3 This requires the sharing of ideas and examples of best practice and also needs appropriate allocation of resources. The Consumer Council recognises the contribution of the OFT Consumer Education Alliance, Planning Group, Skilled to Go Toolkits and Consumer Education Projects Database towards achieving this goal.

5.4 In March 2008, the Consumer Council published the results of its latest consumer proficiency research 'Well, what do consumers know now?' that updated research published by the Consumer Council in 1998 and 2003. Consumer proficiency is a term used to describe an individual's knowledge about their consumer rights, responsibilities and entitlements, their awareness of where to go for expert help and advice and also their ability to deal confidently with issues such as complaining about faulty goods or poor service.

5.5 The development of information, resources and training seminars targeted to suit the various groups listed above have produced a seismic shift in Northern Ireland consumers' skills and confidence in the past four years:

- 6 in 10 consumers considered themselves to be informed about their rights. This represents a **54 per cent increase** (63 per cent in 2007 compared just 41 per cent in 2003)

- The number of consumers who felt confident in expressing their rights had **doubled** since 2003 (73 per cent in 2007 compared to just 37 per cent in 2003)
- More people were now prepared to put their complaint in writing (9 per cent in 2003 increased to 15 per cent in 2007)
- There had been a **119 per cent increase** in awareness of the Consumer Council as measured by those who had heard of us *and* knew something about what we do (47 per cent in 2007 compared with 21 per cent in 2003).

5.6 A prime example of how the Consumer Council have made a significant impact in raising levels of consumer skills and confidence in Northern Ireland is demonstrated in our successful lobbying of government and collaboration with the Council for Curriculum, Assessment and Examinations (CCEA). As a result, from September 2007 Home Economics became compulsory for all Year 8 pupils and was rolled-out to Year 9 pupils in September 2008 and it will be taught to all Year 10 pupils from September 2009. (In Northern Ireland, Home Economics joins Personal Development, Local and Global Citizenship and Education for Employability as key subjects targeted at the overarching objective of the revised curriculum: Learning for Life and Work).

5.7 The Consumer Council continues to enjoy a close relationship with CCEA and sits on the advisory panel for Home Economics. This enables us to continue to influence the development of the Consumer Issues element of the GCSE and A' Level specifications; keeping them up to date with emerging consumer issues and relevant for young consumers.

5.8 To support teachers we have over 100 lesson plans available on our corporate website. As Consumer Skills are covered, to varying degrees, in other subject areas including Business Studies; Citizenship; English; ICT;

Maths and Geography, lesson plans and other resources are promoted to all teachers and cover a wide spectrum of consumer-related issues.

5.9 We have also worked in partnership with the Department for Employment and Learning (DEL) in developing policy that places consumer education and skills within the lifelong learning agenda.

5.10 The Consumer Council also realises the importance of raising consumers' awareness of their responsibilities as well as their rights and our education work programme covers issues including:

- making informed choices,
- when consumers don't have rights; and
- how to complain effectively.

6. IMPROVING CUSTOMER CARE AND COMPLAINT HANDLING PROCEDURES

6.1 As stated in the discussion paper, the variety of self regulatory mechanisms in existence present a challenge in establishing core principles, however, customer care, complaint handling and redress systems are a feature of every business to customer transaction so it is feasible to apply common rules and guidance for all industry sectors.

6.2 The Consumer Council recommended to BERR in the 2008 Consumer Law Review that the established consumer principles of **Access, Choice, Information, Redress, Safety, Fairness, Representation, Quality and Value for Money** be embedded into the legislative framework in much the same way as 'implied terms' are used in the Sale of Goods Act 1979.

6.3 We believe these principles also provide a sound basis for the development of best practice guidelines and codes of practice to ensure

the provision of first rate customer service, information, complaint handling and after sales care.

The Consumer Principles

When buying goods or services, consumers have a right to expect:

Access Can people actually access the goods and services they need?

Choice Do people have choices about where and how they shop for goods and services? Can their choices affect markets to make them work better?

Information Consumers need clear, reliable and accessible information about goods and services to help them make buying decisions, understand their rights and to know what to do if something goes wrong. Businesses should consider how and where information is made available and the needs of people with hearing/sight impairment, low literacy or numeracy skills and people for whom English is not their first language.

Redress When things go wrong, is there a system in place to help consumers get some redress? Is there an effective complaints procedure and good after sales care? Are problems (and solutions) reported centrally so that lessons are learnt that negate future difficulties?

Safety Consumers should not suffer loss or harm as a result of a product or service they have received. Are systems in place to identify risk and ensure that standards are as high as they should be?

Fairness All consumers deserve to be treated with equity and respect and to receive the highest standards of service delivery and customer care.

Representation Consumers need to be consulted and to have their views represented in shaping the development and delivery of goods and services.

Quality Consumers are entitled to the highest standards of quality in terms of the goods they buy or the level of service they receive.

Value for Money Consumers should not pay more for goods and services than their quality, availability or conveyance justify.

7. PROTECTING VULNERABLE CONSUMERS

7.1 The Consumer Council recommends an extension of the concept of 'social responsibility' which already applies to most utility providers so that as part of CCAS core criteria, businesses are required to screen their goods and services, customer care policies and redress systems to ensure that the needs of vulnerable consumers are anticipated and met wherever feasible.

7.2 The Consumer Council recommends that any review of product/provider information and systems of redress (CCAS Criterion 3I) incorporates the views of vulnerable consumers; not only representative organisations but with consumers themselves.

8. STRENGTHENING SYSTEMS OF REDRESS

8.1 The Consumer Council fully supports the CCAS core criteria that require all codes to have in place speedy, responsive, accessible and user friendly procedures for dealing with complaints and low cost independent redress if a complaint is not dealt with satisfactorily.

8.2 Two of the vital elements in the list above are accessibility and user-friendliness. Not all consumers have the knowledge, skills or confidence to seek redress. Others simply choose not to complain. In the Consumer

Council's proficiency research in 2003⁶ and 2007⁷, the most common reasons consumers gave for not complaining were they:

- 'didn't want the hassle'
- 'thought it would be a waste of time'
- 'didn't consider the problem serious (or costly) enough'.

8.3 This is reflected in the OFT's Consumer Detriment Report⁸ where respondents mention time, frustration and cost factors as deterrents to taking a complaint further. Others decide not to pursue things when repeated contacts with the product or service provider fail to bring them closer to a solution, causing consumers to switch to another supplier, (if one is available).

8.4 It is likely that a large number of complaints go unrecorded and unresolved, leading to high levels of customer dissatisfaction. The question has to be asked whether some less scrupulous companies may rely on a 'drop-off effect' from consumers who either lack the patience, time, or skills to pursue their complaint. An added deterrent can be the cost factor involved in making a complaint, such as multiple phone calls to the company or other incidental costs as identified in OFT's report.

8.5 Respondents to the OFT Consumer Detriment survey rated companies 'being easy to contact' very highly, followed by the company 'acknowledging the problem', 'providing information' and showing 'a degree of sympathy'.

8.6 It is also interesting to note that in a British Standards Institute survey conducted in May 2007⁹:

⁶ Consumer Knowledge – well, what do you know? 2004

⁷ Well, what do consumers know now? A Consumer Council Progress Report on Consumer Proficiency, March 2008

⁸ Consumer Detriment Report – Accessing the frequency and impact of consumer problems with goods and services. OFT, April 2008

⁹ <http://www.bsi-global.com/en/About-BSI/News-Room/BSI-News-Content/Sectors/Services/New-customer-service-guidelines/>

- More than a third of consumers said they would stay loyal to a firm if it apologised following a customer service failure;
- Yet, in three-quarters of all cases of poor customer service, no apology was offered;
- Overall, 76% of consumers said they had taken their business to a competitor as a result; however
- 91 per cent of those who receive exceptional customer service are more likely to go back to the same business and 79 per cent say they would recommend it to a friend.

8.7 In November 2007, the Consumer Council consulted with Customer Service Managers from many of the large Northern Ireland high street retailers to ask them how their business could become better at encouraging more reticent consumers to come to them with their complaints and feedback. Participants compiled a list of suggestions that they felt could be easily implemented at relatively low cost. These included:

- Customer comment cards at the till
- Interactive kiosks placed in store for customers to provide feedback
- Pictures of in-store staff so that customers view them as friendly and approachable and know who to go to with a problem
- Customer service desks to be better situated in store with improved signposting
- Customer suggestions box
- Greeter at door who can deal with queries/issues
- Information about what to do and who to contact if you have a problem to be printed on the back of the receipt
- Promotion of chat forum/feedback pages on company websites.

8.8 Whilst self regulation offers one route to redress for consumers, the Consumer Council recommends a review of the Small Claims Court with a

view to encourage greater use by consumers who may find the word 'Court' off-putting or fail to associate it as a route to redress for disputes concerning goods or services.

8.9 The Consumer Council also recommends an awareness raising campaign about the role of the Small Claims Court to encourage better take up of its services by consumers. In 2006, 60 per cent of the small claims issues in Northern Ireland were taken by banks, finance houses, companies and shops.

8.10 Consumer Council research in 2007¹⁰ found that whilst 60 per cent of consumers surveyed were aware of the Small Claims Court and had some idea of what it does, a sizeable proportion of Northern Ireland consumers were largely unfamiliar with this route to redress.

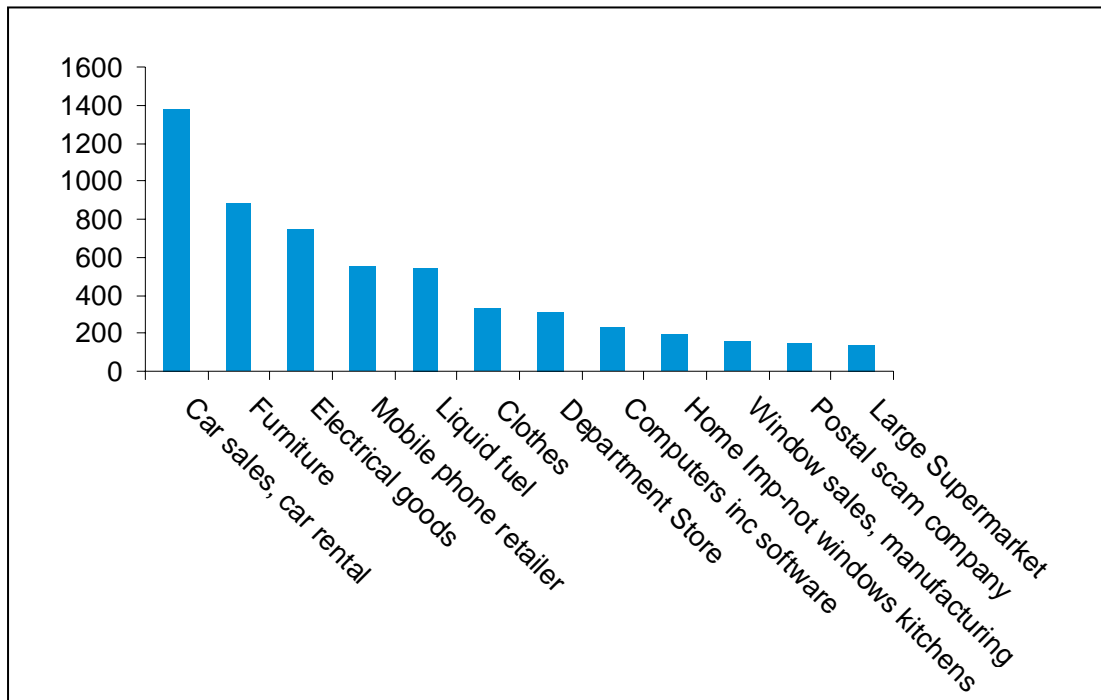
9. MARKET AREAS FOR A SELF REGULATORY APPROACH

9.1 The Consumer Council supports an intelligence-led approach in determining market areas that may benefit from a self regulatory approach. We recommend that information is gathered from sources that go beyond the enforcement network and involves 'front line' organisations such as Citizens Advice and independent community advice centres. This should include all regions, including Northern Ireland.

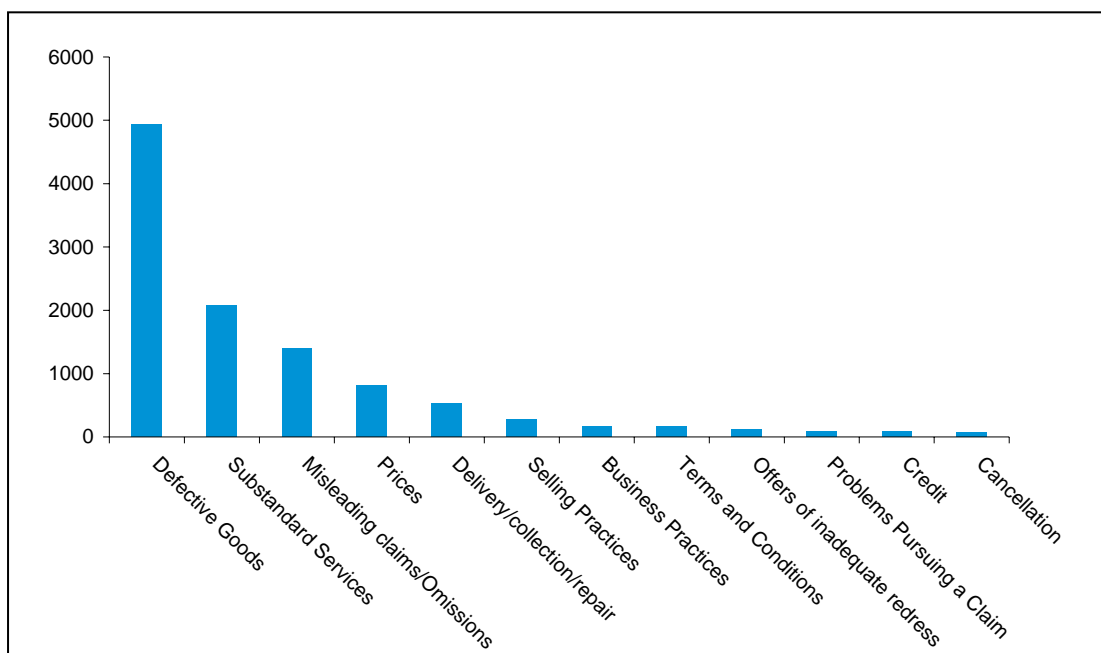
9.2 The 2007-2008 Consumerline¹¹ Annual Report showed that the most commonly complained about business types in Northern Ireland are as follows:

¹⁰ Well, what do consumers know now? 2008

¹¹ Consumerline is the NI equivalent to Consumer Direct. The telephone helpline is managed by Trading Standards Service and the website www.consumerline.org is managed by the Consumer Council.



9.3 The Consumerline Report 2007-2008 also gives a breakdown of the most common complaint types:



9.4 The Consumer Council assumes that similar data from the rest of the UK will be reviewed and analysed as a means of identifying markets that cause detriment and that this will help to determine where self regulatory approaches might be further explored.

9.5 The 2008 – 2009 Consumerline Annual report has not been finalised as yet but it appears that much the same pattern emerges again with the exception that ‘audio-visual’ has been overtaken by ‘home maintenance and improvements’ for types of business most commonly complained about. In terms of complaint types, defective goods and substandard services still take precedence, but breaches in contract and failure or delays in delivery have increased, as have pricing issues i.e. overcharging and misleading prices.

9.6 Although not mentioned specifically in the discussion paper, self regulation would seem to lend itself well to addressing internet retailers’ compliance with the law in relation to the provision of consumer facing information about cancellation rights. The OFT’s Internet Market Study found that more than half (56 per cent) of internet shoppers surveyed online did not know about their right to cancel and 28 per cent of UK-based online traders said they were not aware or slightly aware of the laws applying to internet shopping. The study also found that one in ten (12 per cent) of electrical sites and nearly four in ten (39 per cent) of music retailers’ sites did not appear to mention the cancellation period. In addition, there was evidence that some sites were imposing conditions that could prevent or deter consumers from exercising these rights.

9.7 It is with interest that we note SafeBuy are working towards CCAS approval covering the internet retailing sector.

10. SUMMARY OF RECOMMENDATIONS

Alignment of consumer and business interests

- The Consumer Council recommends that OFT do more to further address the protection of deposits or prepayments, (as per CCAS Criterion 3j).

Consumer law and customer care education and skills for business

- The Consumer Council recommends that consumer education and customer care training take a more prominent role within the model of self-regulatory components.
- The Consumer Council prefers a more pre-emptive approach which sees staff training provided at the earliest opportunity to instil a sound understanding of consumer law and best practice in relation to customer care.
- The Consumer Council recommends that greater priority be given to educating businesses and raising their awareness of consumer protection legislation, best practice in customer care and complaint handling. This is especially important for 'frontline' staff who need to be empowered to deal confidently and consistently with problems as and when they arise.
- The Consumer Council recommends that in addition to exploring the potential for further self regulation arrangements which sees involvement of consumer organisations, representatives, enforcement and advisory services in the operation and monitoring of the code, (CCAS Criterion 2c and 4b); that OFT and its key partners raise awareness among non-code holders of existing sources of advice and support.

Creating informed, confident consumers

- The Consumer Council recommends that Government, consumer protection organisations, regulators and education stakeholders work together to deliver education initiatives aimed at empowering consumers. These should be developed to suit a variety of audiences including:

schools and colleges; youth sector; adult learners; community and voluntary groups; and business and retail.

Improving customer care and complaint handling procedures

- We recommend the established consumer principles of Access, Choice, Information, Redress, Safety, Fairness, Representation, Quality and Value for Money should be used in the development of best practice guidelines and codes of practice to ensure the provision of first rate customer service, information, complaint handling and after sales care.

Protecting vulnerable consumers

- The Consumer Council recommends an extension of the concept of ‘social responsibility’ so that as part of CCAS core criteria, businesses are required to screen their goods and services, customer care policies and redress systems to ensure that the needs of vulnerable consumers are anticipated and met wherever feasible.
- The Consumer Council recommends that any review of product/provider information and systems of redress (CCAS Criterion 3I) incorporates the views of vulnerable consumers; not only representative organisations but with consumers themselves.

Strengthening systems of redress

- The Consumer Council recommends a review of the Small Claims Court with a view to encourage greater use by consumers who may find the word ‘Court’ off-putting or fail to associate it as a route to redress for disputes concerning goods or services.

Market areas for a self regulatory approach

- The Consumer Council recommends that information is gathered from sources that go beyond the enforcement network and involves ‘front line’ organisations such as Citizens Advice and independent community advice centres. This should include all regions, including Northern Ireland.

11. CONCLUSION

The Consumer Council appreciates the opportunity to participate in this consultation. We hope that you will find our comments useful and that our views will be reflected in the final decision making process. In the meantime, if you wish any additional information please contact Philippa McKeown, Senior Consumer Affairs Officer on: 028 9067 4814 or by e-mail:

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