

Consumer Focus Board

Paper 11.1

Title:	Outreach
Purpose:	For decision
Date of meeting:	9 July 2009
Responsible officer:	Ed Mayo
Prepared by:	Philip Cullum and Ed Mayo
Attachments:	None

1. Overview

- 1.1 Consumer Focus represents the diversity of consumers and their range of needs, across Great Britain and, for post, the UK. We have staff based in offices in Belfast, Cardiff, Glasgow, London and, until the end of this month, Bournemouth - plus a small number of home workers.
- 1.2 Our work should not be determined by where our offices are, but rather our insight into the diversity of consumer experience and our analysis of their needs and the case for change. This in turn requires: a clear intellectual framework underpinning our thinking, (which the Board agreed in February 2009); a strong evidence base; and the right relationships, not only in Whitehall, Cardiff Bay, Holyrood and Stormont but right around the country.
- 1.3 This is a preliminary paper that considers the extent and potential for outreach work to build our capabilities and connections, and proposes options for how Consumer Focus could explore further outreach work. This paper was first developed in March and has been deferred through both the March and May Boards, but the content and importance of empowerment was reinforced at the recent Joint Boards' Awayday.

2. Action for the Board

- 2.1 The Board is asked to DISCUSS and AGREE the draft definition of outreach that is *"tools to promote advocacy that expand Consumer Focus' connection with diverse consumers through action to understand, engage and empower consumers."*

2.2 If this is a helpful way of characterising 'outreach', then the question for the Board is: which of these levels we should be directing our resources to? And how? We propose three options for the Board to select:

- Immediate implementation – go beyond existing work plans with new outreach activities
- Strategy planning – no decision at present but integrate consideration of outreach and further development of options within the Forward Work Programme 2010/11 strategy work, due to start with the Boards meeting in June 2009
- Pause – explore how to reduce current levels of outreach work

2.3 We recommend the option of 'Strategy Planning' on the grounds that current outreach work has value and is seen as an effective way of delivering the work programme already agreed by the Board, but we do not have the resources to add work and to do so will come at a high opportunity cost of planning by senior staff time.

2.4 If the Board endorses this option or the option of immediate implementation, it is asked to discuss and agree principles relating to the proposed approach to outreach set out in section 4.

3. The key issues

The context

3.1 The predecessor bodies had different ways of reaching out to consumers. In particular, Postwatch sought to 'represent' consumers through paid members of regional committees with staff support. Energywatch's office network and distributed complaints handling helped to give it a regional understanding and it developed an extensive contact network for local advice agencies and others concerned with 'priority' vulnerable consumers. Drawing on a network of volunteers associated with the Scottish Consumer Council, Consumer Focus Scotland operates a Consumer Network, which comprises some 227 home-based volunteers who act as the 'eyes and ears' of the organisation in different communities around the nation. Members live in each of the 32 Scottish local authority areas.

3.2 The Consumer Focus model of organisation moves away from any claim to represent 'consumers', instead stressing the research and evidence base (including scanning of complaints data from a variety of sources) that allows us to represent the 'consumer interest'. The information that we have from Extra Help Unit cases and calls to Consumer Direct adds to this evidence base, as will the work of the Complaints of General Interest team once this is in place. The Board has therefore identified a need to ensure that we have the outreach in place in our work to be able to understand and advocate change for consumers.

3.3 Consumer Focus has a wide programme of work on stakeholder engagement, including extensive work at devolved level. At the same time, there is more work to do to capture

and systematise our approach, not least as we prepare plans for consultation on the Forward Work Programme 2010/11. However, in this context, of particular relevance is the work we have developed on an online outreach programme of work in relation to energy and post. This supports advice agencies and related voluntary and community sector organisations in their contact with consumers – and helping them to feed back information on key trends to us for our advocacy work. We are also establishing information sharing agreements with advice providers and later this year we will organise a series of 13 events across the nations for advice providers. The key tools we have developed include the:

- Knowledge Base, with over two thousand answers to energy advice questions,
- Partners' Website, which gives access to further resources for advice providers, and
- new email network with information and alerts that we have started called Consumer Community.

3.4 Also relevant is the small, experimental programme we are running under the theme of Consumer Focus Labs. We have put out an open call for ideas for online innovations that could help to empower consumers. The Board received a summary briefing on this work in late March 2009.

3.5 It is worth noting that other consumer bodies have experience that will be relevant. Passenger Focus, for example, has moved away from regional offices in England and Wales and has a small number of staff that work from home in different locations, with a brief for advocacy and contact with agencies that are more accessible for them. Consumer Council for Water operate a more traditional office and committee structure, but with the advantage that this mirrors the regional presence of water companies.

3.6 Several Board members have offered suggestions and advice on outreach. These include noting the work in the voluntary sector on online models and the need to supplement these with work to reach the multiple disadvantaged. For example, the Barrow Cadbury Trust worked with voluntary groups who stood outside school gates at home time to talk to parents that might otherwise be hard to reach. Voluntary and community sector organisations play an important role in supporting people, particularly in relation to members of marginalised communities.

3.7 These approaches do not have to be contradictory, except in terms of the resource opportunity cost. There is no reason why we could not have more than one model in operation – for example, a body like the Ofcom Advisory Committee for England (which has regional representation) or a structure of regionally-based managers like Passenger Focus plus an English equivalent to the Consumer Network which the current Consumer Focus Scotland operates.

3.8 At a political level, any change in Government at UK level following a General Election is likely to alter the balance of policy work and resources at the national, regional and local level. Either a Conservative or Liberal Democrat influenced Government would most likely stress further localism, but possibly with a stripping away of English regional infrastructure.

Definitions

- 3.9 In the preparation work for this paper, we described outreach as ‘about having consumer intelligence and demonstrable insight into consumer diversity and experience (including compliance with our statutory duties to have regard for certain groups of vulnerable consumers), legitimacy, spotting coming issues, and have the right connections to influence, in terms of decision-makers (who are not all in the capitals), alliances/campaigns and examples to back our analysis.’
- 3.10 However, the responses from Board members identified a wide variety of expectations as to what problems outreach was the solution – ranging from the need for greater focus on England and English consensus at governance level through to contact with local advice bureaux or companies at neighbourhood level. It is important to unpick what we mean by outreach, or at least to be much clearer about the strategic objectives we intend to promote by exploiting outreach activities. As we have noted, other public sector bodies are scaling down English Regional presences and some of the Board suggest we should not be embarking on new expenditure in this area at present.
- 3.11 The Consumers, Estate Agents and Redress Act 2007 offers an important underpinning to the consideration of outreach, in particular that Consumer Focus has;
- A duty (section 6,4) to ‘have a regard to the interests of consumers that are one or more of the following – (a) disabled or chronically sick individuals; (b) individuals of pensionable age; (c) individuals with low incomes; (d) individuals residing in rural areas’.
 - A power to establish regional committees
- 3.12 It was also noted that there are some consumer segments that are best understood as communities of interest irrespective of geographic location. Responses from Board members on the first aspect stressed the fact that we should understand the interests of key segments of consumers irrespective of whether they are located in one or another country within the UK - such as rural hill farms.
- 3.13 There is a duty on Consumer Focus to have regard to these groups but this does not mean that we can’t have different ways of achieving this across the Consumer Focus family.
- 3.14 Board members’ comments clearly rejected setting up regional committees. They saw risks of standing committees that would eat up resource, become bureaucratic or be captured by unrepresentative individuals and issues.

Three Levels of Outreach?

- 3.15 The purpose of outreach that was echoed across a number of comments from Board members, for example in relation to the criteria for such work, was knowing the right things about consumers and telling the right people about those issues. Outreach is a two way process that can be just as much about information dissemination as

information gathering. We still need a discussion about our role in terms of providing information.

3.16 We propose one way of characterising outreach, which is to distinguish three levels:

Level One	Understand	Research and insight into the full diversity of consumer experience in order to drive our advocacy on behalf of consumers
Level Two	Engage	Two-way communication and contact with a selection of consumers that shapes our advocacy on behalf of consumers
Level Three	Empower	Support for consumers that are able to be advocates themselves for their own and others' interests.

Level One: Understand

3.17 The first level is a powerful tool if done systematically, although it is essentially 'extractive'. A number of Board members stressed the strategic importance for Consumer Focus of developing a systematic and high quality base and approach for consumer intelligence. For example, set out the need to define markets, select relevant segmentation of consumers and then identify the most cost-effective way of gathering data and insight.

3.18 To ensure that Consumer Focus has a strong evidence base to inform its work, we have established a substantial research budget. To make the most of this investment we have recruited a highly experienced Principal Researcher, Justin Gutmann, who amongst other things is a former Chair of the Market Research Society, the industry professional body. We are already commissioning research including quantitative surveys, focus groups, online assessments and deliberative events.

3.19 These are typically structured to reflect relevant aspects of consumer diversity, such as income, age, gender, ethnicity and location. This emphasis on consumer diversity – reflected in our policy attitude that there is no such thing as 'the consumer' – is important not just because it is essential to being an effective advocate for consumers, but also because we have a statutory duty on aspects of diversity. The legislation does not, of course, rule out consideration of other aspects of diversity in addition, which may be related to vulnerability, detriment or multiple disadvantage.

3.20 The advantage of this level is that it can be replicated in a cost-effective way, it provides data that can be used for advocacy and it is a rapid way of learning about trends.

Level Two: Engage

- 3.21 The second level allows consumers to set the terms of reference for the questions we ask as well as the answers that they give. It opens up opportunities for deliberative methods, where consumers have an opportunity to learn and exchange views with others before settling on their perspective. Some issues are well suited to this form of research, particularly ones that are controversial or that involve a degree of technical knowledge. It may also be of particular relevance in planning and setting priorities for our work. Consumer Focus has contributed to best practice in public services in this field, developing a code on engagement with the participation agency Involve.
- 3.22 The advantage of this level is that it adds legitimacy to our work and allows us to ‘walk the talk’ in terms of innovative methods of engagement.

Level Three: Empower

- 3.23 In Ed’s first stakeholder engagement in 2008, he described the difference between a ‘deficit’ model of campaigning, which assumes that consumers cannot typically organise to influence those in power directly, and an ‘asset’ model, which recognises that, in the right conditions, consumers can increasingly do this. Examples of consumer campaigns range from membership based networks such as Unfarepak, user-based voluntary organisations such as MIND through to online consumer communities such as moneysavingexpert.com.
- 3.24 There are different ways of creating platforms for consumers to be able to influence opinion-makers, some of which can be highly resource-intensive and some of which end up as narrow or self-selecting in their constituency of action. The online space is of particular relevance because it reduces many of these barriers to participation. Consumer Focus has a small, experimental programme of work on online innovation for consumers and we expect to be able to learn from this over time. We are also carrying out work to map the extent of gaps in consumer information in markets such as mobile phones, where better information could help and empower consumers. One possible future option is to promote the development of an online resource of consumer empowerment leaflets that could be downloaded in advice agencies.
- 3.25 The advantage of this level is that it is more powerful if people relate their own experience and they can benefit from doing so.

4. Proposal

- 4.1 We propose a definition of outreach that is *“tools to promote advocacy that expand Consumer Focus’ connection with diverse consumers through action to understand, engage and empower consumers.”*

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4.4 In relation to the 'Strategy Planning' option, we would suggest that the following principles might apply:

- a. It is a high priority for Consumer Focus to establish a strong research base and reputation for the quality of our evidence. This means a strong focus on level one, understand, at present.
- b. Level two, engage, can be relevant for certain policy issues and there is a good cultural fit for Consumer Focus in promoting engagement. The most symbolic investment would be around setting Consumer Focus' own priorities, which would imply exploring opportunities for creative engagement in the consultation for our own forward work programme for 2011/12.
- c. The third level, empower, is best developed through an investment in new online media and this would need to be a step change forward from the current level and models of activity at Consumer Focus.
- d. Outreach is something that is best integrated across Consumer Focus' work rather than as a standalone programme.
- e. There are opportunities to replicate the current outreach work with advice agencies outside of the designated sectors. This would have resource implications though.
- f. There are opportunities for initiatives, such as a rolling programme of Consumer Fora, the development of a Consumer Network for England, an Observatory on micro-experience of consumers in one illustrative disadvantaged neighbourhood, and these are best considered alongside other proposals for resources in the next round of strategic planning.
- g. If the Board wish to explore setting up a Consumer Network for England, then we recommend starting this and basing this largely online, for ease of development.

- h. For vulnerable groups, there is no question that Consumer Focus will need at some level to develop networks of intelligence and partnership with groups that understand or represent key constituencies. Work already completed by the Public and Community Services team points to the potential for strengthening connections with local authorities as conduits and champions for local communities.
- i. It will be useful to have dialogue across the Boards in the Consumer Focus family to ensure that we learn what works and know that whatever is done fulfils our statutory duties and strategic objectives.
- j. If we take forward outreach work as a key objective, we will need to develop success metrics and assess progress.

5. Resources

- 5.1 The proposal is for further exploratory work to form part of the planning framework for 2010/11 and the resources to do this would need to be met within current staff time.

6. Next steps

- 6.1 We propose that options on outreach are developed in the context of the strategic planning round for the Forward Work Programme 2010/11 – following decisions on wider strategy first discussed at the Joint Boards' meeting at the end of June 2009.