

## Consumer Focus Board

Paper 4
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**Title:** CEO Report

**Date of meeting:** 29 September 2011

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**Attachments:** Directorate Reports

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It is now a year since the Government announced its proposals to abolish Consumer Focus. Despite the inherent difficulties, we are producing more work, better work and more impactful work than ever before. We can point to real achievements over the last year in helping bring about changes in public policy and commercial behaviour and in empowering consumers. We seek to be the voice of the consumer and our public profile is higher than ever. Staff and Board members deserve enormous credit for these achievements in difficult conditions.

Government tell us that we can expect to be in existence for another 18 months. We can expect a cut in our budget next year and this will be on top of a 26% cut over the past two years. We have shown that neither cuts nor the threat of abolition means that we cannot continue to do a good job for consumers.

However it would be wrong not to recognise that it will be difficult to continue to do the job Parliament has given to Consumer Focus. We need to prepare for these difficult times and that will mean that we need to work closely with BIS, whose support we will need, and with those organisations who take over from us, when Government reaches its conclusions. We must ensure that the assets and skills we have built up with public money are passed on so that the work we have done, and which will be needed in the future as it is now, continues.

Staff are working very hard across Consumer Focus. They are very committed and they want to do more, not less. That is very admirable and in the finest tradition of public service. However, we must recognise that the oxygen supply is reducing and will continue to reduce. We are going to be able to do less. The amount we can demand from staff will reduce and we must avoid trying to do too much for fear of over burdening people or loading them so much they make errors.

## CONSUMER FOCUS AND CONSUMER FOCUS POST POLICY ADVOCACY

Director of External Relations: Adam Scorer

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### 1 ACCOMPLISHMENTS SINCE LAST BOARD MEETING

#### 1.1 Consumer Focus Success in the Media

- 1.1.1 July saw our highest ever amount of media mentions in a month, and a 23% increase in coverage from our previous best ever result (which was in March 2010 when cash ISAs launched). This is part of a longer trend. Our coverage for Jan - July 2011 is 32% higher than the same period in 2010. Since January 2011 a total of 34 members of staff (23%) of the total number of staff, in addition to Board members have been quoted in the media.
- 1.1.2 In particular, national broadcast – television and radio – showed a marked increase in July, and there was an average 41 hits per week in national newspapers in July. This includes strong coverage in Welsh and Scottish national papers in addition to UK nationals.
- 1.1.3 Across the period, energy was the prime media issue, with stories focusing on energy price rises and energy company profits; Electricity Market Reform White Paper; British Gas and EDF responding to our call to halt doorstep sales; and Ofgem's fine of British Gas for complaints issues.

#### 1.2 Energy

##### Energy Performance Certificate (EPC)

- 1.2.1 Our report: 'As Easy as EPC?' on consumer views on the content and format of EPCs featured in related DECC/Cabinet Office publication on customer engagement and behaviour change. The Government Microgeneration Strategy and action plan recognised our call for EPCs to reflect the true value of microgeneration. As a result the EPC is now to be redesigned in line with our recommendations.
- 1.2.2 The Empowerment and Energy teams are working closely with BIS and Number 10 on the MyData project which pushes for increased customer access to the data behind the EPC to help third parties provide more accurate energy efficiency advice. We are also pursuing the possibility of the MyData initiative pushing forward data matching for social assistance programmes.

##### Hills Fuel Poverty Review

- 1.2.3 We commissioned Donald Hirsch (Loughborough University) and Centre for Sustainable Energy to undertake research on consumer fuel expenditure to feed into the Hills fuel poverty review. We supported an amendment to the Energy Bill to bring forward Government's proposals for introducing minimum energy efficiency standards to the private rented sector. We also drafted an amendment to the Energy Bill on 'data matching' between the Government and energy companies to improve the targeting of low income consumers. Neither amendment was successful at the report stage but there will be further opportunities to promote them.

1.2.4 Consumer Focus signed up to an End Fuel Poverty Campaign letter printed in Guardian called for a major re-think of the Government fuel poverty policy in light of price rises. We wrote a chapter on reforming the ECO levy to reduce the impact on low income consumers' bills for the Fuel Poverty Advisory Group's 2011 annual report to Government (to be published shortly).

### **Off gas**

1.2.5 We provided substantial information on off gas consumers to the OFT to help inform their market study, the conclusions of which are coming out in October.

### **Market Structure**

1.2.6 The EU Market Integrity and Transparency regulation includes all our substantive recommendations, which should lead to a more transparent and accountable monitoring regime for wholesale markets. The Energy and Climate Change Committee report on RMR validates many of our campaign recommendations which include a need for greater transparency; liquid markets; new competitors; and simpler products.

### **Tariffs**

1.2.7 Following a challenge from Consumer Focus, British Gas has analysed consumption patterns of its Economy 7 customers and identified customers who should be on a different tariff – which should save the 10k customers affected around £250,000 per year. We are now rolling out the initiative to the other suppliers.

### **Sales and marketing**

1.2.8 We published our 'End of the Road' report on doorstep sales which has received extensive media coverage. Three major suppliers have now signed up to our moratorium and a four is working towards ending the practice. Only one supplier has signalled its intention to continue cold-calling, with the remaining one still considering its position.

### **Micro Businesses**

1.2.9 Our policy recommendations on back billing in the non-domestic sector have been accepted by Ofgem, negating the need for a public campaign with FSB. Consumer Focus is participating in the new ERA working group which is developing a set of back billing principles in response to Ofgem's challenge. Work is ongoing on analysing the results of the information request on business suppliers' debt and disconnection processes. The results are being shared with Ofgem as part of RMR related work in this area. The team also met with ScottishPower to review their business customer service and debt processes.

### **Performance Information**

1.2.10 Consumer Focus carried out a quarterly audit of price comparison sites during July and August as part of the regular monitoring process. The audit aims to further improve the consistency and accuracy of results on accredited sites. Generally performance in the testing phase was good, with queries about tariffs resolved quickly.

1.2.11 We published our fourth energy supplier performance league table. There was good media coverage, focusing mainly on EDF Energy's poor performance since the implementation of its new billing system. Overall call volumes on energy matters to Consumer Direct are down, which may be in part due to a reduction in opening hours and a move to Directgov. However

we have analysed signposting arrangements on suppliers' websites and bills and have written to the industry about lack of visibility of Consumer Direct.

### **Debt and disconnection**

- 1.2.12 Ofgem has published the latest social monitoring statistic which has for the first time seen a narrowing of the debt recovery rates on pre-payment and credit terms, with a drop of 20% on the average PPM weekly recovery rate. This is an issue we first raised in the debt and disconnection work back in 2009 and have continued to pursue it with Ofgem and suppliers.
- 1.2.13 Discussions with the big 6 suggest they will agree once again to the suspension of all disconnections over the winter.

### **Smart Meters**

#### **Smart meters - Protection**

- 1.2.14 Our concern about end-to-end testing of the security of smart metering systems not taking place until 2014 was raised in a report issued by the National Audit Office on smart meter rollout. We continue to work with Ofgem on draft licence conditions and guidance around remote disconnection and switching. The protections we have pushed for in this area featured in the final consultation on licence conditions and strengthened protections on load limiting.

#### **Demand response and Smart tariffs**

- 1.2.15 We spoke at the Westminster Energy Environment and Transport Forum on smart grids and at the European Regulator's Association hearing on demand response also responding to its (CEER) consultation. Our impact will be measurable when the advice to regulators on demand response is published at the end of the year. We gained agreement from the Low Carbon London LCNF pilot, rolling out 5,000 smart meters as part of its trial of new tariffs and technologies to offer a 'price guarantee' that no customer will be worse off than they would have been had they not participated in the trial.

#### **Smart and informed – health issues**

- 1.2.16 Following sustained work by Consumer Focus, Government has formally recognised health concerns around electromagnetic sensitivity (EMS) and smart metering. In line with our proposals, it explicitly states that technology must comply with existing best practice and international standards; the programme will engage with the Department of Health and other stakeholders.

#### **Interoperability**

- 1.2.17 Largely as a result of our efforts, DECC<sup>1</sup> has proposed a licence condition that suppliers take all reasonable steps to ensure the smart metering equipment, including the IHD in customer's premises, is interchangeable. This is the first time formal consideration has been given to, not just the interoperability of the meters, but also the communications and smart appliances. There are still real problems with interoperability and we are developing a paper for the board to review our approach in this area.

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<sup>1</sup> A consultation on draft licence conditions and technical specifications for the roll-out of gas and electricity smart metering equipments

### **Data privacy and security**

1.2.18 Based on our input to DECC around reporting on non-compliance, all suppliers reported that they are carrying out or planning to carry out privacy and security impact assessments on their processes. We also succeeded in ensuring that end-to-end security testing of system takes place in 2012 instead of 2014. Our ongoing work and report on self disconnection have also influenced DECC's consideration of obligating suppliers to use smart metering data to monitor self disconnection and take appropriate action as part of its regulated duties. We wrote to Energy Minister, Charles Hendry supporting his proposed approach to data access and use.

### **Value for money/Billing and tariffs**

1.2.19 We worked with NEA to develop a proposal to DECC on research to look at what extra help low income and vulnerable customers might need during rollout of time of use tariffs. NEA is now working with British Gas to trial approaches. Following a challenge from Consumer Focus and the Daily Mail, Ofgem confirmed that consumers on variable rate tariffs could not be subject to a termination fee if the supplier raised their prices.

### **Data Privacy - Smart specific legislation**

1.2.20 Our arguments have led Government to suggest that aside from the Data Protection Act, additional smart meter specific legislation may be required to clarify legitimate use of data in energy for smart metering. Influenced by our request, the Energy Networks Association has published a privacy and security impact assessment.

### **In Home Displays (IHD)**

1.2.21 Our engagement with government has led DECC to commit to set up a working group to look at 'inclusivity by design'. This, and our evaluation report – 'Getting to grips with smart meter energy displays', should ensure displays are designed in a way that meet the needs of all consumers. This report and our upcoming work on usability of IHD were name-checked in the Government's latest smart metering consultation. Ofgem, E.ON, BG, and ERA are giving funding and participating in our IHD project - EDF is currently considering its position and may also join.

### **Consumer and smart meters**

1.2.22 We published our first two confidential monitoring reports on smart meter rollout. These outlined the number and kinds of calls about smart metering that have been received by Consumer Direct for both domestic and non domestic customers and will be used as an early warning of problems. We trained Consumer Direct Advisors on using the new smart metering codes and smart metering in general. Consumer Direct has now updated their Codes and are recording issues regarding smart meters. We can now capture smart related customer concerns and will be sending reports to DECC and Ofgem.

### **Smart from the start**

1.2.23 We were able to persuade government to require suppliers to give customers energy efficiency advice during the smart meter installation visits. This is important to help customers realise the benefits of smart metering. Government has specifically stated that Consumer Focus should be consulted (we are the only consumer group to be named), when developing and reviewing the code of practice which will require suppliers to both develop and comply with mandatory installation.

1.2.24 On sales however, government has proposed that suppliers will have to seek written consent from customers prior to carrying out sales and face to face marketing during the home smart meter visit - this reflects Consumer Focus' arguments and is strongly opposed by industry.

### **EU and International Advocacy - Energy**

1.2.25 We contributed to DECC's position on the draft Energy Efficiency Directive and liaised with BEUC, Friends of the Earth and Fiona Hall MEP. We also contributed to working groups established by European Parliament Rapporteur to inform his report (amendments) to the legislation. Some of our input had been accepted in the Commission proposal but our concerns on many other issues are yet to be addressed. Consumer Focus now has a strong working relationship with many of the stakeholders on the draft Energy Efficiency Directive which should help the uptake of our amendments.

1.2.26 The regulation and investment in demand management/smart meters is being prepared in various draft EU legislative measures and guidance documents. Our co-ordinated input into all (including speaking platforms at key events) aligns our EU and GB advocacy to achieve common objectives. Consumer Focus is the main consumer organisation contributing to EU energy policy.

1.2.27 Consumer Focus is organising an event to be held in the margins of the 2011 Citizens Energy Forum. Chaired by Paul Lewis, BBC Money Box presenter, our workshop will examine the challenges to consumer empowerment and representation in the UK as well as on the European level. The event will bring together decision-makers from industry and legislative and regulatory bodies as well as consumer and third-sector organisations. We hope that the event will provide insight on the challenges to strengthening the consumer voice in EU policy and share best practice.

### **Media**

1.2.28 We have had approximately 50-60 media interviews in the last month across a range of national and local radio and specialist TV on topics such as price rises, profit margins, doorstep selling, and electricity market reform.

### **Energy Bill and Green Deal**

1.2.29 There were numerous Consumer Focus mentions during the Energy Bill debate around our amendments on smart metering. Caroline Lucas, MP, tabled our amendment to prohibit sales of unaccredited products during Green Deal home visits, others will be clearer during the Report Stage in mid September/October. We prepared Energy Bill Report Stage briefing for circulation in September and produced briefing for parliamentarians. Impact visible on consultation responses and in DECC's conclusions.

Meanwhile we have continued to work on Green Deal policy, in particular on the Code of Practice.

## **1.3 Post and Post Offices**

### **Mail Market Transformation**

1.3.1 We responded to Ofcom's consultations on postal regulation, the transition to the new regulatory framework and amended Forward Work Plan. We agreed with their broad transitional roll-over of current licence conditions from 1<sup>st</sup> October into the new interim regime

and their approach to effecting the consumer protections which would otherwise fall by the wayside. We met with Ofcom to discuss future working together, influence their plans going forward and to provide them with information arising from our research proposals.

### **Universal Postal Services**

- 1.3.2 We commissioned research into data on about what residential and business customers need from a sustainable universal postal service. This will help inform the scoping of our proposed future research on honing the parameters of what consumers want. We contributed to a EU Commission work regarding their USO research and responded to Postcomm's consultation on international post.

### **Royal Mail Quality of Service results for 2010-11 and Q1 2011-12**

- 1.3.3 Royal Mail's unadjusted Quality of Service statistics for 2010-11 show that it did not meet the local 1<sup>st</sup> class target in 50 post code areas (out of 118), as well as across the UK on retail 1<sup>st</sup> and 2<sup>nd</sup> class, Bulk 1<sup>st</sup> and 2<sup>nd</sup> class mail, special delivery, and also collection and delivery points. The degree of failure for the retail 1<sup>st</sup> class service is sufficient to fall below the tolerance levels allowed and could trigger the C-factor (i.e. an indirect fine in the form of a restriction on the amount Royal Mail may be entitled to charge for stamp prices in the following year) and of sufficient magnitude of failure in relation to the percentage of delivery routes completed each day for Postcomm to consider an investigation. Royal Mail has submitted an application to Postcomm for a bad weather force majeure exemption in relation to its Quality of Service annual targets and Postcomm has yet to reach a decision.

- 1.3.4 Royal Mail's latest Quality of Service performance figures for quarter 1 2011/12 show that it did not meet its targets for retail First and Second Class mail, Bulk First, Second and Third Class and Special Delivery during March-June 2011 (i.e. Quarter 1). Performance on its First Class service was 91.4% of post being delivered on time as against the target of 93%. The results for both First and Second Class deliveries were the worst in Quarter 1 for the last four years. At a local level Royal Mail failed to meet its First Class delivery target in half of UK postcodes. The worst areas included Guildford, Stoke-on-Trent and Dundee; in the GU postcode area just 81.3% of First Class post was delivered on time. Royal Mail say its Quarter 1 failures are due to local implementation of its modernisation programme.

### **Royal Mail Condition 21 applications**

- 1.3.5 We have responded to the consultation covering these 3 applications having first conducted some omnibus research on consumer views of the leaving post with a neighbour option as well as consumer perceptions about other mail products, such as recorded delivery and certificates of posting. The results supported our view that the delivery to a neighbour only works in some cases and is not a one size fits all solution. Royal Mail has as a consequence agreed to provide an opt-out to consumers in the trial. A media launch of the results will happen in September and the other consumer perceptions in October.

### **Condition 7 applications**

- 1.3.6 We responded to Postcomm's consultation on Royal Mail's application for exemption from the publication requirements under Paragraph 4 of Condition 7, and the notification requirements to Consumer Focus under paragraphs 2 and 3 of Condition 7 in relation to certain large packet services contracts. We agreed to their request following discussions with Postcomm on how they will monitor this area going forward and given that this relates solely to the large (and generally) bulk packet market.

## **Modernisation**

1.3.7 We met with Royal Mail on 14<sup>th</sup> September to discuss progress and impact of its modernisation programme and are also due to visit its delivery office in West Bromwich on 27<sup>th</sup> September to see how this translates on the ground.

## **Monitoring and Influencing PO network changes**

1.3.8 We have raised our profile on Code of Practice work through MPs and the stakeholder outreach programme. We secured changes to POL's telephone helpline messaging in the event of service interruption.

## **PO Locals**

1.3.9 Consumer Focus has agreed the terms of reference for, and core membership of, a stakeholder group to provide consumer scrutiny on the ongoing pilots for the PO Local operating model. The group will meet regularly from this autumn. Four area-based pilots of the Local model will commence from October 2011, with approx 45 subpostoffices being converted into Locals pilots in Devon, Hertfordshire, South Yorkshire and Gloucestershire. We intend to actively monitor the implementation of these changes and understand immediate consumer impacts relating to the service changes.

## **Network-wide service interruption**

1.3.10 The post office network was unable to process card payments, complete bank transactions, and allow consumers to access their pensions and benefits for 6 hours on 27 July. This was caused by a major system outage, by far the worst system breakdown in many years. Consumer Focus provided immediate consumer information through press lines and the Extra Help Unit, and secured improvements to the information being provided to consumers via POL's customer service helpline. We will be seeking a number of improvements to POL's contingency planning in the event of future service interruptions, particularly around how information provision is cascaded to concerned customers.

## **Access to current accounts over the PO counter**

1.3.11 Consumer Focus published research on 31 August that highlights significant consumer appetite to access all UK current accounts over the post office counter. Our research finds that 18 million people would be likely to use the Post Office, including 3 million HSBC and Santander customers who are currently unable to use the Post Office to access their accounts.

1.3.12 Consumer Focus argues that expanded post office banking would benefit consumers in rural areas, restore access to banking for people living in communities where the last bank branch has already closed, and offer additional flexibility for consumers who could access their accounts when using the Post Office to access other products and services.

1.3.13 Consumer Focus is urging banks that already offer post office access to promote this facility more effectively. Consumer awareness of current access at the Post Office is very low; with only 18 per cent of consumers aware they have this option. Our research shows banks should use Online Banking, ATM prompts and monthly statements to increase awareness among their account holders.

1.3.14 The report was widely cascaded to MPs, peers and relevant stakeholders, and was warmly received by BIS Ministers, with whom we have been working closely on this issue in recent

months. In the coming weeks, we will be meeting with a number of banks and the British Bankers Association to discuss how the report's recommendations can be implemented. RBS Banking Group (RBS, NatWest and Ulster Bank) has since announced that with effect from 23 September, their 19 million debit card holders will be able to make cash withdrawals from their accounts at post office outlets.

### **Post and Post Offices – Northern Ireland**

#### **CF NI - Study of Mail Delivery Problems in NI**

- 1.3.15 The final report will be published in late September. The report renews our focus on issues of misdelivered mail to flats by Royal Mail and the need for a joined up approach by them, Housing Developers and Building Regulators.

#### **PO Network Research into Accessibility, Environment and Service Quality in NI**

- 1.3.16 A draft report based upon our research is being circulated amongst postal policy colleagues and publication is planned for late September. We have raised awareness within POL of the importance of accessibility, service and environment issues of post office branches in Northern Ireland with the future roll-out of PO locals. The findings highlight the importance of the PO network with politicians and it has encouraged a debate on the need for a diversification fund in NI.

### **EU and International Advocacy – Post**

- 1.3.17 We participated in a workshop on progress of Commission studies into methodologies to measure consumer preferences in the postal sector and intra-community postal deliveries. We are developing a good relationship of trust with relevant Commission unit which changed earlier in the year. This unit is now responsible for digital as well as post. We have received an informal invitation to the Postal Forum on 12 December but question the proposed approach to the agenda.

## **1.4 Communication/digital**

### **Access to Broadband**

- 1.4.1 Consumer Focus attended the Broadband Stakeholder Group workshop on transparency of traffic management information in July. Our recommendations were taken on board by the BSG and hopefully this will improve the implementation of its code of practice.
- 1.4.2 We contributed to the design of Consumers International research into quality of broadband services for Africa/Europe region, and commissioned a survey on consumer experiences of broadband services in the UK. Our work will contribute to the CI global campaign on improving access and quality of broadband services, and should strengthen our advocacy nationally by gathering evidence on consumer experiences of broadband services in the UK.
- 1.4.3 We sent out a letter to the DCMS Secretary of State - Jeremy Hunt, to seek a meeting on the issues relating to the Communication Bill and contributed to the response of the open-letter. Our response aims to put consumers at the heart of the future Communication Bill. We were successful in a joint tender with Civic Consulting and Gallup to the European Commission market study on the functioning of the market for internet access and provisions from the consumer perspective. We will conduct the market study shortly.

## **UK Copyright**

- 1.4.4 We briefed MPs and Lords on the ongoing Hargreaves Review, focusing on questions raised at the Westminster Hall debate through the 'parody' briefing, and on developments regarding the Digital Economy Act, mainly on website blocking. We also briefed MPs at the Westminster Hall debate around format-shifting and levies. MPs supported an exception for format-shifting and two MPs specifically said that it should be introduced without a levy. We responded to Government announcement that it endorses Hargreaves' recommendations to reform copyright law and licensing. We also responded to the BIS Committee inquiry on the Hargreaves Review.
- 1.4.5 We have finalised our BECTA report together with National Education Network on copyright licensing in schools and educational establishments for publication this month. The report is designed to stimulate the ongoing debate on copyright licensing and maintain momentum for Hargreaves' recommendation to establish minimum standards for collective societies.
- 1.4.6 We commissioned two major research - consumer awareness of legal music services to be published in September, and the legal opinion on website blocking for copyright infringement which should be published in October, they will form the building blocks for advocacy and consultation responses. We continue to have ongoing engagement with DCMS and Ofcom on website blocking, plus press work on the issue. We attend the meetings which DCMS Ministers have called on web site blocking. We are the only consumer representative at these meetings which mainly consist of rights holder bodies, internet service providers and companies such as Google and Yahooo.
- 1.4.7 Long term impacts of our work in July include building support for Hargreaves implementation amongst parliamentarians (briefings and events in October and November), and capacity building amongst other stakeholders who support Hargreaves recommendations.
- 1.4.8 Responded to Government announcement on taking forward the Digital Economy Act (£20 appeals fee), preparing joint submission with Citizens Advice on the impact of the fee on low income consumers to the European Commission - submission in September.

## **1.5 Consumer Law and Redress**

### **At EU level**

- 1.5.1 Consumer Focus participated in a debriefing meeting on ECCG activities for other GB third sector stakeholders to help inform Consumer Focus and Which? advocacy in Brussels. We collated a first response to BEUC 50th anniversary consumer strategy initiative and drafted an analysis of consumer policy in GB to help shape advocacy priorities and approach for coming years.
- 1.5.2 We responded to Law Commission's consultation on consumer redress for misleading and aggressive practices. We met with BIS Consumer Rights Bill project manager, and wrote letters to the UK MEPs of the LIBE Committee of the European Parliament to influence their voting on the Communication regarding the European Commission's review of the Data Protection Directive. Many of our recommendations were included in the report.

### **At UK level**

- 1.5.3 We represented Consumer Focus at the roundtable on the online data protection organised by the Consumer Communications Panel. We also jointly submitted formal feedback with the

Consumer Federation of America on the OECD's draft policy guidance on online and mobile payments on behalf of CI.

## **1.6 Financial Services**

### **Financial Services Regulation**

- 1.6.1 We responded to the FSA's consultation on Approach to Regulation, and the Treasury White Paper consultation on the Blueprint for Reform. We also provided evidence to the Joint Parliamentary Committee on the financial services bill with input from Christine Farnish and Stephen Locke. Christine gave oral evidence on that committee on 15<sup>th</sup> September which was well received.
- 1.6.2 We responded to ICB's final report on the future of banking which we were pleased to note referenced our research "Stick or Twist" as part of its case for making changes to the switching process. Our response included measures to increase real competition and provide products that benefit consumers on low income
- 1.6.3 Building on our report - Fair Enough?, CI, BSI and the FSA are leading work on the application of standards in the financial services sector. We provided clear input of certain technical and service areas (for example TCF) where standards could play a role.

### **Consumer Empowerment**

#### **National Payment Plan**

- 1.6.4 We fed into discussions around future work on the National Payments Plan and set out our views on the process that led up to the decision to retain cheques. We also submitted a paper to the Payments Council on issue of Continuous Payment Authorities for these to be considered as part of their NPP consultation.
- 1.6.5 We raised concerns over any costs associated with the proposals for a 7 day automated switching service for current accounts. Our evidence suggests this is not necessary because consumers are not concerned about length of time it takes to switch. We do however warmly welcome work on direct debit redirection which has the potential to vastly improve the switching process.

### **Banking**

- 1.6.6 We met with Simon Thompson of the Chartered Banker Institute. He briefed us on attempts to improve the professionalism of the Banking Industry through chartering. It was a fruitful meeting about how to drive up standards in the banking sector. We contributed to the debate on modern payment methods, and provided much needed evidence on whether there is widespread misselling of packaged bank accounts.

### **Cost of Credit**

- 1.6.7 We submitted a response to the OFT's Debt Management Guidance consultation, and published our affordable credit report Affordable Credit – Lessons from Overseas, which generated considerable interest among stakeholders and media.
- 1.6.8 We met with FSA regarding the cancellation of continuous payment authorities and the Payment Services Regulations. The FSA advised that this is a breach of the Payment Services Regulations for the bank to make the payment and the consumer is entitled to a full refund.

The banks have agreed to take steps to rectify the problem. We were involved in ongoing liaison with Consumer Credit Counselling Service (CCCS) to inform them of the recent developments and with regard to getting possible case studies to publicise this issue.

### **Financial Inclusion and Basic Bank Accounts**

1.6.9 We met with Brian Pomeroy to discuss the future of Financial Inclusion and Basic Bank Accounts. We were panel members at the London Minority Ethnic Elders Event on 'Financial Services and Older People'. It was a well-attended and lively event. It has opened up the opportunity for us to participate in future events of this nature, as well as establishing a good working relationship with such grass roots organisations. We stimulated a good debate over policy making for disadvantaged consumers across the economy and to ensure that basic bank customers continue to have the widest possible access to their bank accounts

### **1.7 Public Services**

#### **MyData**

1.7.1 We have joined the Mydata Strategy Board. Beyond attendance at Board meetings, we have proactively collaborated with Which? to develop a set of 'consumer side' questions, covering key concerns about the initiative and highlighting areas for clarification. We have also provided feedback on initial drafts of the Mydata charter, setting out the principle for the initiative that participating businesses will be expected to sign up to. Consumer Focus have also inputted into the design of consumer research that the Board is commissioning.

#### **Complaints Blueprint paper**

1.7.2 A blueprint/discussion paper on the principles for effective handling in RIU sectors has been drafted. This will be used to inform our Landscape response (Q17) and to underpin wider RIU activity as appropriate.

#### **Collective switching**

1.7.3 We have briefed officials at DECC, BIS and No.10 on an idea around the potential for a collective switching service in markets where consumer inertia means competition is stalling. This idea would utilise the coordinating power of web 2.0 technologies to provide a focal point around which individual consumers could group to make a 'Big Demand'. Once critical mass has been reached the service would run a reverse auction process, the provider who is able to offer the best deal would win the chunk of the market share that participating consumers represent. This approach has the potential to deliver 'more for less' for participating consumers – securing them with better outcomes.

#### **Parliamentary Ombudsman**

1.7.4 We have responded to the Parliamentary Ombudsman's consultation on opening up access and changes to the MP filter.

#### **PwC, WWF and World Business Council for Sustainable Development forum**

1.7.5 Lucy Yates spoke at the forum, addressing new business models for sustainable development. The aim of the event was to develop practical insights into the research and actions needed to make progress on sustainable consumption. There were around 40 participants from diverse backgrounds including innovation, advertising, finance, consumer behaviour and a range of

industries (Information Communication Technology, transport, food and drink, utilities and pharmaceuticals) and the public sector.

## 1.8 Other

### Supercomplaint

1.8.1 On 21 September, we issued a supercomplaint “*The Hidden Costs of Holidays*” which calls for:

- Cash-withdrawal charges on UK transactions should be cost-reflective or even banned if not justified
- Simplification of charging structures for using card overseas. Greater disclosure alone may not help consumers – the current raft of charges are so complex that they may not be understood by customers even if transparency is increased
- Clearer explanation of exchange rates used by suppliers to make comparison easier for consumers. Customers would benefit from a clear illustration of the rates they will receive eg exactly how much foreign currency £100 will buy once all charges have been applied

### Government’s announcement on releasing data

1.8.2 On 7 July, government made an announcement on releasing data, including a commitment by the Office of Rail Regulation to increase the amount of data published on service performance and complaints by May 2012. This is a definite win for Consumer Focus as it results from our input to the empowerment strategy and CF Labs creation of a ‘proof of concept’ site which we pitched to ORR earlier this year.

### Corporate Services

#### Annual Report 2010/2011

1.8.3 We published the Consumer Focus Annual Report in early July.

#### Exit interviews

1.8.4 We undertook comprehensive analysis of 25 exit interviews (67.6% response rate) conducted between July 2010 and May 2011. Findings included that 92% of respondents said their line manager showed fair treatment and respondents were positive about organisational culture, work environment, scope and autonomy, and learning and development – in contrast, it was acknowledged that there was little progression from basic pay (poor reward for high performance) which is likely to be coupled with the pay freeze that is in place.

1.8.5 Management information showed turnover in April 2010 to March 2011 was below the UK norm at 10.3%, excluding compulsory redundancies (10 Regional Managers within NSMC). Voluntary turnover is currently at 5.8% and we are working hard to try to ensure this continues, though it is likely to be increasingly challenging over the coming period.

### Bullying and harassment

1.8.6 We have introduced a number of measures including a revision and update of our management guidelines and procedures as well as the publication of a strong and clear Zero Tolerance statement. Next month we intend to conduct a short survey, focused purely on

bullying and harassment, to help determine current levels and we hope the findings will reflect our efforts with an improvement on last year's results.

### **Comprehensive benefits statement**

1.8.7 It can be difficult for staff to fully understand their total benefits package as an employee of Consumer Focus. This year we decided to provide all employees with a comprehensive information pack, containing:

- annual pension benefit statement;
- total reward statement (individually calculated for each employee);
- generic benefits summary list.

The packs have been well received and the individual element will be maintained within HR to provide updated statements should employees require them.

## CONSUMER FOCUS FINANCE AND OPERATIONS

### Director Finance and Operations: Graham Clark

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#### 1 ACCOMPLISHMENTS SINCE LAST BOARD MEETING

##### 1.1 Finance

- NAO carried out external audit. The accounts were highly praised by the Audit and Risk Committee
- Clear Line Of Sight (CLOS) reports for 2010/11 completed
- Whole of Government Accounts (WGA) reports for 2010/11 completed.
- Budgets input into Open Accounts system

##### 1.2 HR

- Significant activity on recruitment following BIS approval. Managing a total of 14 external positions and 15 internal since approval on 27 July. Anticipate that all new employees will be in position by the end of the year.
- Introduced comprehensive benefits statements to assist with retention and motivation.
- Concluded the TUPE transfer of Waterwatch employees into Consumer Focus.
- Implemented changes to job titles following staff consultation across the organisation, including issuing revised job descriptions and amendments to contracts.
- Prepared initial data gather of non attributable staff information for BIS and government actuaries department (GAD) as part of the early stage moves toward transfer/closure.
- Refreshed and re-issued statement on zero tolerance to bullying and harassment
- Reviewed trade union recognition agreement to reflect move to single union.
- Conducted annual audit of personal data along with annual equality and diversity audit.
- Supported managers to take more supportive action on absence management and attendance levels have increased since February 2011.
- Undertook comprehensive analysis of exit interview data July 2010-May 2011.

##### 1.3 IT

- 99.77% System availability during operational hours in Jun – Aug
- Completed IT service requests Jun (561) Jul (506) Aug (475)
- IT strategy document updated

## **2 CHALLENGES RUNNING UP TO NEXT BOARD MEETING**

### **2.1 Finance**

- Finance Manager has resigned and will leave the organisation at the end of Sept 2011. This is a business critical post which will leave us short of qualified accounting resource and resource generally.
- BIS/Treasury are insisting upon a split of administration costs to an external audit standard, however the definition of what this means is not clear and discussions with colleagues at BIS are being undertaken to bottom this out. The risk is there will be significant additional effort required to achieve the requirement once it is known.
- Open Accounts system software version to be brought up to date so that helpdesk support can be efficiently maintained (requiring support from IT).
- Production of a forecast for 2011/12 while uncertainty exists on recruitment, budget for 2012/13 and transition decisions.

### **2.2 HR**

- Balance of budget forecasts with future resource requirements.
- Develop and manage the process of projects transferring/closing across the organisation as a result of funding ceasing including staff consultations.
- Consider and manage the realistic possibility of a move to stage two of the reduction programme.
- Bring into the organisation a number of new employees at a time when there is unsettlement.
- Retention and motivation
- Develop framework in anticipation of due diligence in relation to TUPE
- Disclosure and case preparation for ongoing employment tribunal (race discrimination)

### **2.3 IT**

- 182 pending service requests
- Server patching and security updates
- Internal audit 20-22 September
- Assisting Finance to update software version for Open Accounts software
- Implementing call recording solution for EHU

**NATIONAL SOCIAL MARKETING CENTRE**

**Director: John Bromley**

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**1 ACCOMPLISHMENTS SINCE LAST BOARD MEETING**

- 1.1 Over the past three months the NSMC has continued to deliver on the core DH work programme. The final six e-learning modules have been completed and are now available free of charge to DH/NHS staff on the NSMC website. Work towards accreditation of the e-learning modules and the development of a Diploma in Social Marketing (accredited by CIM) is also progressing well and links to the DH Quality Assurance work stream. In research, The NSMC has been working with international partners to develop additional case studies for upload to Showcase and the team has also working with COI to promote One Stop Shop to the NHS and government.
- 1.2 The NSMC has held discussions with HMRC regarding evaluation of their tax compliance programme and implemented several initiatives for NEIEP in the areas of car sharing, loft insulation and energy reduction. The NSMC has delivered training to the Finland Institute of Public Health and the S/E Asian Network for Tropical Diseases in Cambodia.

## CONSUMER FOCUS SCOTLAND

Senior Director: Marieke Dwarshuis

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### 1 ACCOMPLISHMENTS SINCE LAST BOARD MEETING

#### 1.1 Change/impact achieved

##### Policy

- On 15 August, Waterwatch Scotland, the consumer advocacy body for water in Scotland was dissolved and its advocacy functions transferred to Consumer Focus. CFS will deliver, at transfer, our new statutory functions and we will embark on a new programme of research and policy development on the key consumer issues in the water industry. The new CFS work programme for water has been well received by the Scottish Government, Water Industry Commission for Scotland, SEPA and DWQR. A draft consumer engagement strategy has also been produced. This will use the Consumer Network to conduct initial research into consumer views on water.
- We launched our Shoppers Rights Cards at an event in Nethy Bridge, in the Highland constituency of Enterprise Minister Fergus Ewing, who formally presented the new cards. Over 140,000 cards have been distributed through a number of venues – retailers, citizens' advice bureaux, libraries and trading standards offices. A number of publications plan to promote the Shoppers Rights Cards including 300,000 promotional Spar mailings direct to householders across Scotland and in e-newsletters of stakeholders. Colleagues in Wales joined us by launching the Welsh Shoppers Rights Cards initiative on the same day.

##### Extra Help Unit

- Work levels have remained consistent over the summer period, and at lower levels than during the winter. Over £65,000 of financial redress was recorded on closed cases.
- A meeting was held with NPower who in some instances were gaining warrants with the intention of installing a prepayment meter, but could not proceed due to the location of the existing meter, so instead disconnected the supply. Npower have now revised their policy and in these circumstances, will make renewed attempts to agree a payment plan before disconnecting.

#### 1.2 Significant activity

##### Consumer Network

- There has been an increase of members, and we are nearing the 500 mark: another 5 members have been recruited bringing the total of Consumer Network volunteers to 490.

##### Policy

- Our report *The Post Office Network in Scotland: a front office for consumer access to local government services?* was published, calling on councils to offer more services at Post Offices and for the Scottish Government to create a 'high-level' group to identify services that could be offered at Post Office counters.
- Our research report *Life after work: what Scotland's baby boomers want as they grow older* was published on 14 September.

- Our policy paper on digital consumers, *Scotland's Digital Needs – Paving the way for wider access to digital services*, was published on 16 September.
- Sarah O'Neill has been co-opted onto the board of the Scottish Mediation Network and attended her first meeting on 31 August.
- We have experienced significant demand for our consumer guide to common property repairs and maintenance '*Common Repair, Common Sense*'. We have now distributed 30,000 hard copies. The Scottish Parliament Information Centre recently produced a briefing for MSPs on factoring and maintenance of common property. This made several references to the guide. We will now write to all MSPs informing them of how they and their constituents can access this publication (e.g. on-line).
- Dates and venues for Energy Best Deal Scotland for the next few months have been set and delivery is underway of an extensive programme with partners Money Advice Scotland, Citizens Advice Scotland, Energy Action Scotland, targeting frontline advisers providing financial advice, advisers working in the health or community food sectors. In addition, a CD-ROM version of the training is in the final stages of design.
- We have commissioned research to explore the extent to which community benefit funds associated with renewable energy developments are being re-invested in energy efficiency measures at local level, particularly in rural and remote areas. The research will take account of the views of communities and of energy industry stakeholders and is expected to report in November 2011.
- CFS has been contributing to the development of the new Existing Homes Alliance Scotland, which was formally launched on 7<sup>th</sup> September 2011. The main focus of the Alliance is the systematic delivery of energy efficiency across all Scottish housing, in order to address both fuel poverty and climate change emissions.

### **Extra Help Unit**

- EHU Supplier Liaison Meeting with the 'Big 6' energy suppliers was held in Glasgow. Discussions were based around complaint volumes and trends across financial years 2009 to 2011 and the increasing difficulty in engaging with consumers who do not disclose circumstances, are refusing to pay and even refusing to use PPMs. Keith Jones from CAS also provided an introduction to the work being carried out to transfer EHU to CAS.

### **Community Food and Health (Scotland)**

- The Scottish dissemination seminar for the Northern Periphery Programme action research on remote rural retailing took place in Inverness in September and the international dissemination is planned for Iceland in November.

### **Health Rights Information Scotland**

- HRIS has continued working on the development of the Patient Charter of Rights and Responsibilities. Publishing the Charter is a statutory requirement under the Patient Rights (Scotland) Act 2011, and HRIS are producing the Charter on behalf of Scottish Government. The Scottish Government has put the draft Charter out for internal consultation with Scottish Government policy leads and NHS stakeholders, prior to external consultation later in the year.

### **Healthyliving award**

- The healthyliving award has been shortlisted as one of four finalists in the Nestle Wellness Award at this year's national IGD Food Industry Awards. Short listing was based on a comprehensive written submission and was followed by an oral presentation by each finalist in front of a panel of judges. The winner will be announced on the 11<sup>th</sup> October.

### **Scottish Accessible Information Forum**

- SAIF have been asked to provide training on Hidden Accessibility provided for the Scottish Parliament corporate body. This has developed into a further request for a guide to making your information accessible to be designed for them, working with their own consultants.

## **CHALLENGES RUNNING UP TO NEXT BOARD MEETING**

### **Policy**

- The first meeting of the legal capability working group, working in the context of Scottish Government's Making Justice Work programme, will be held in mid-October. We would expect to issue the tender for the research element of this work in November.
- We will explore the potential for establishing a Cross Party Group in the Scottish Parliament on postal issues.

### **Extra Help Unit**

- Interviews to be held at the end of September for 4 Caseworker positions, vacant as a result of resignations and internal promotions. In tandem with that there will be continued support and development of secondments from energy suppliers (currently 3 advisers).
- Continue to work with Keith Jones (secondment from CAS) to ensure the needs of the EHU are fully understood and taken account of during discussions about transfer of Consumer Direct to CAS and future delivery.

### **Transition**

- Chris Thirkettle will start on 3<sup>rd</sup> October as Transition Manager with CFS, and will focus on transfer of SG projects and possible early transfer of EHU.

# Consumer Focus Wales

Senior Director: Maria Battle

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## ACCOMPLISHMENTS SINCE LAST BOARD MEETING (28<sup>th</sup> June – 29<sup>th</sup> Sept)

### 1. CHANGE/ IMPACT ACHIEVED

#### 1.1. Food Hygiene

1.1.1. In June Liz Withers and I met Welsh Government officials and the Health Minister, Lesley Griffiths AM to discuss food safety, including mandatory display of food hygiene ratings. We discussed the elements that Consumer Focus Wales would like to see in any Welsh Government Food Bill to ensure mandatory display of food hygiene ratings meets consumers' needs.

1.1.2. On 12 July the Welsh Government announced that as part of the legislative programme for 2011-2012 it will bring forward a Bill to introduce mandatory display in Wales, the First Minister stated:

*“Protecting the health of our citizens remains a priority for this government. The E.coli O157 outbreak in South Wales in 2005 showed how important food safety is and whilst the voluntary scheme has achieved good results, it suffers from a lack of coverage. Since food hygiene is essential to help improve food safety we will be bringing forward a draft Food Hygiene Rating Scheme (Display of Information) (Wales) Bill for consultation at the end of this year. It will allow the Welsh Government to make mandatory arrangements for providing consumers with easily understandable, at-a-glance information on the hygiene standards of a food business – so they can make better informed choices about where they eat out or shop for food.”*

1.1.3. Wales will be the first country in the UK to have mandatory display and this is a direct result of our research and influencing work. We received an e-mail from Sharon Mills who lost her 5 year old son in the outbreak:

- *“This is fantastic news, thank you so much for all the hard work you have put in to make this happen...this never would have been possible without your support. This really shows that the public need you and rely on you heavily to act as our voice. The support you have shown to the Families involved in the E.coli outbreak has been outstanding and I can never thank you enough.”*

1.1.4. Ms Mills also submitted evidence to the Public Affairs Scrutiny Committee, see link below:  
<http://www.publications.parliament.uk/pa/cm201011/cmpublic/publicbod/memo/pb09.htm>

1.1.5. On 13 August, Liz Withers and I met with officials from the Food Standards Agency (FSA), including representatives from their legal team, to discuss the likely passage of the Bill and its contents. On 11 August we also attended an FSA UK stakeholder meeting to discuss how we may be able to work with them on a public campaign about food hygiene in the home.

1.1.6. On 7 September we attended the FSA's UK open Board meeting in Cardiff for the Board's discussion of their formal response to our latest E.coli O157 report (March 2011). The

chair, Lord Rooker and CEO Tim Smith thanked us for our work in this area which they said had impacted across the UK and how regulators like the FSA need strong consumer advocates to scrutinise them and hold them to account. We have also been campaigning for full food hygiene inspection reports to be available on the FSA website and the FSA executive and the UK Board committed to this in principle and it will be discussed more fully at their meeting in November.

1.1.7. We have secured a meeting with the First Minister on 5 October to discuss the outcome of the FSA food law review in Wales and how the monitoring of the Pennington report recommendations will be taken forward in future years. We are also on the steering group for the UK food law review, the first meeting of which will take place on 27 September.

## 1.2. Shoppers Rights

1.2.1. On September 9 Consumer Focus Wales launched our Shoppers' Rights Cards. The cards – based on the successful Northern Ireland model – have been distributed to over 500 locations across Wales including CABx, public libraries, AM and MP constituency offices, credit unions and student unions. The campaign has been welcomed by politicians across parties, and we will be following up their interest with local media promotion in the next few weeks.

## 1.3. Consumer Focus Investigations

### *Purchasing Freehold*

1.3.1. MoneysavingExpert is about to publish an online guide which explains why and how leaseholders should purchase their freehold. This guide is a joint piece of work between Consumer Focus and MSE arising out of Lisa's placement with MSE before Christmas 2010. The guide is being checked before publication and should also include a link to the right to manage tool which CF Labs produced on behalf of CFI.

## 2. SIGNIFICANT ACTIVITY

### 2.1. Energy

#### *Off-gas*

2.1.1. Consumer Focus Wales launched our 'Top tips for domestic oil consumers' campaign the week beginning 12 September. The main aim of the campaign is to empower consumers to get the best possible deal on their heating oil ahead of the coming winter.

2.1.2. The campaign is supported by the Energy Savings Trust (EST) and NEST (the Welsh Government's Fuel Poverty Programme, which is managed by British Gas and EST). A number of other partners, including Age Cymru and Care and Repair Cymru, are helping us to distribute posters and 2000 specially designed tea towels setting out the top tips to consumers across rural Wales on how to keep costs under control and signpost to the Welsh Government NEST fuel poverty scheme for future information.

2.1.3. The campaign has the backing of the Welsh Government who have agreed to promote the tips in their magazine *Gwlad* which is sent to over 40,000 farmers in Wales.

2.1.4. The launch was held back to tie in with an initiative by the Department of Energy and Climate Change (DECC) to bring consumer organisations and the industry together to avoid a repeat of last winter, when many homes were left without oil during the heavy snow.

### **Fuel Poverty Coalition**

- 2.1.5. On 6 July the Fuel Poverty Coalition Cymru launched our revised calls for action to tackle fuel poverty in Wales, '*Countdown to affordable warmth: an agenda for the new Welsh Government*'.
- 2.1.6. The '*Hit Fuel Poverty for 6*' event was well-attended with strong support from all the coalition partners. The new Minister for Environment and Sustainable Development, John Griffiths AM, gave a keynote speech welcoming the coalition's calls. He has since given his written commitment to working with the coalition and to ensuring the Welsh Government does all it can to tackle fuel poverty in Wales.

### **Cross-Party Group on Fuel Poverty**

- 2.1.7. On 13 July the Cross Party Group on Fuel Poverty met for the first time in this Assembly term. The main purpose of the meeting was to appoint a Chair (Mark Isherwood AM was re-appointed without opposition) and to discuss the future work programme of the group.
- 2.1.8. To date there has been strong support for the CPG across all parties. Six AMs attended the first meeting and a total of 14 AMs (4 Conservatives; 6 Labour; 3 Plaid Cymru and 1 Lib Dem) have expressed their support for the group and a wish to attend future meetings.

### **Ministerial Energy Supplier Round Table**

- 2.1.9. On 4 July Lindsey attended the first Ministerial Energy Supplier round table between representatives of the Big Six energy suppliers and the Environment Minister, John Griffiths AM.

### **Energy Market**

- 2.1.10. On 29 June Consumer Focus Wales joined seven other 'energy related' organisations for an 'Energy Market' event, organised by Ofgem and the Energy Savings Trust. The event provided an opportunity for us to discuss our energy work with new Assembly Members and their researchers.

## **2.2. Post**

- 2.2.1. We met with Welsh Government officials in June to discuss the Post Office diversification fund and we have subsequently been part of the formal evaluation of the programme.
- 2.2.2. Work has now begun on our projects looking at 'Locals' in Wales and the suitability of the model, particularly in rural and deep areas; and our project looking at Local Authority services delivered through the Post Office.
- 2.2.3. The WLGA have expressed an interest in the project and are keen to contribute to the final report. We plan to meet them again later in the year, once the initial survey of local authorities is completed.
- 2.2.4. Work is progressing well on our joint project with Action for Hearing Loss Cymru (previously RNID) and RNIB Cymru, looking at issues at the provision of services for the sensory impaired in Post Offices. Both organisations have undertaken focus groups with their members to identify the key elements to be measured in the mystery shopping exercise, which will be undertaken by people with sensory impairments.

2.2.5. Together with the Consumer Focus Post team we presented our work on post offices in Wales to Plaid Cymru MPs in Parliament on 14 September.

### 2.3. Park Homes

2.3.1. Our work on park homes continues with a wide range of activity having been undertaken by Consumer Focus Wales and Consumer Focus Investigations.

2.3.2. We have commissioned research with both local authorities and residents on park home sites to provide a comprehensive analysis of the numbers of park home sites currently in the UK (there is currently no agreed/reliable list of all sites), the number of people living in park home sites, the operators involved, the issues facing residents, what they have done to try and overcome them and barriers they have encountered when trying to resolve problems.

2.3.3. On 28 July, Liz Withers and Gemma Bowen met Tom James, Regulation Manager in the Housing Directorate at the Welsh Government who is undertaking a review of the Residential Property Tribunal Service in Wales. The aim of the meeting was to influence the review to take account of the needs of park home residents ahead of jurisdiction for disputes under the Mobile Homes Act 1983 moving from the County Courts to the Tribunal in Wales.

2.3.4. We have also met with Annette Brooke MP, who is championing the issues affecting park home residents in Parliament. Annette is the vice-chair of the All Party Parliamentary Group on park homes in Westminster.

2.3.5. We have been engaging with colleagues in the GB energy team to discuss some of the issues that have been raised through our work to date on energy costs and supply on park home sites, particularly around the resale of electricity costs where park home owners do not have a direct relationship with their electricity company and instead receive a bill from the site owner or a 3<sup>rd</sup> party holding company and there can be a lack of transparency in these costs, as well as a lack of choice.

2.3.6. On 31 August, Liz and Lisa met with the Consumer Council for Water to discuss issues relating to water on sites including maintenance of pipes, cost of supply and access to water meters.

### 2.4. Consumers And Regulatory Services

2.4.1. We were commissioned by LBRO to undertake work looking at consumer attitudes to regulation. Themes for discussion with consumers, included their:

- confidence in the standards of regulatory services;
- views on the effectiveness of regulatory services;
- views on the best means of ensuring compliance and enforcement.

2.4.2. Liz Withers presented an outline of the report at the Wales Regulators Forum on 7 September.

2.4.3. We used the findings to give a consumer input in the BIS consultation document "Transforming Regulatory Enforcement: Freeing up Business Growth"

## 2.5. Consumer Focus Investigations

### ***Private Parking Operators:***

2.5.1. CFI has been investigating the issues faced by the users of private car parks and their joint work with Citizen Advice is continuing. The team has met with the British Parking Association (BPA) to discuss their business model for implementing an Appeal services for all consumers who use private car parks. CFI and CA met with the lead civil servant at the Department for Transport to put forward our proposals on how an appeal service should operate. This included the proposal that the Dept for Transport approves any redress system that individual organisations (predominately the BPA) may put in place.

2.5.2. We have submitted all our evidence to the OFT and called on them to take a test case.

2.5.3. CFI met with the DVLA in June to discuss its processes for the release of registered keeper details. A further meeting was then facilitated by CFI between the Trading Standards Institute and the DVLA. As a result, the DVLA agreed to produce a summary of their role and involvement with private car parking operators, an explanation of how they can assist Trading Standards Officers in their work and finally how Trading Standards should approach the DVLA in order to refer a case and make them aware of any issues with an operator.

### ***Referrals***

2.5.4. For the period 1 June 2011 up to 24 August 2011, the team has received 14 external and 2 internal referrals. These range from further requests for refunds from Shoppers Discount, to parking referrals, a complaint about the use of 0844 numbers by GP surgeries and aggressive sales tactics by a national make-over company. All referrals have been responded to with signposting, advice and/or own action.

## 2.6. Consumer Focus Labs

2.6.1. The Wales Mail Report website was published in July. The site provides improved access to Royal Mail quality of service and complaints data for Wales.  
<http://walesmail.cflabs.org.uk/>

2.6.2. In July, CF Labs met with the Food Standards Agency IT team in York to demonstrate our Food Hygiene Ratings prototype and to discuss technical elements required to make improvements to the FSA ratings website.

2.6.3. Work has continued on producing a commentable and interactive website for the GB 'Online Public Services Manifesto' report.

## 3. FUTURE CHALLENGES

3.1.1. Maintaining morale during the passage of the Public Bodies Bill and awaiting the outcome of the public consultation on consumer landscape.