



**Utility Regulator draft Corporate Strategy 2019-2024**

**Consultation Response**

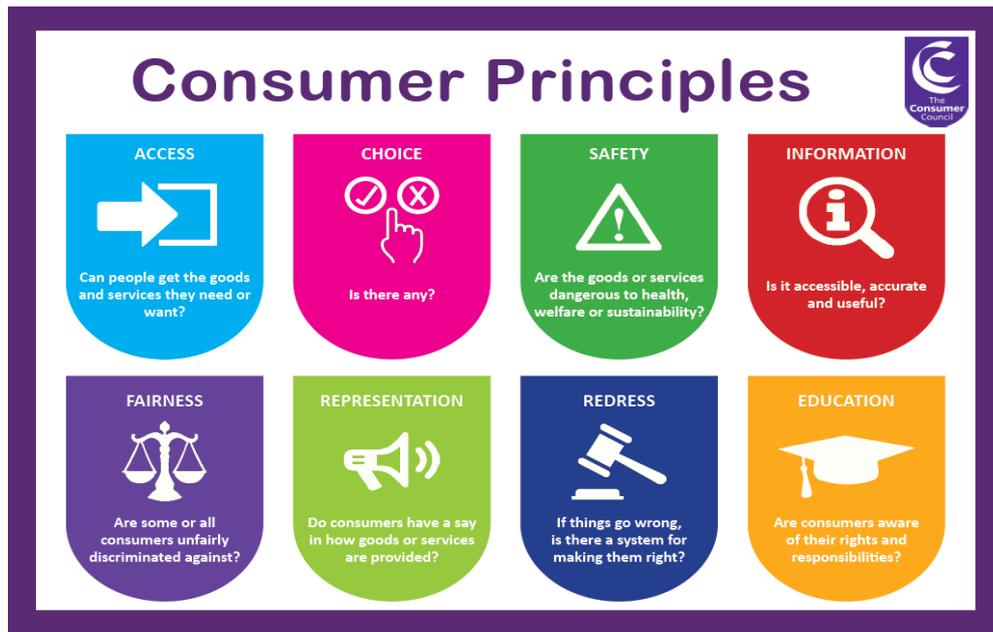
**January 2019**

## **1. Introduction**

- 1.1 The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (NI) Order 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland.
- 1.2 The Consumer Council has specific statutory duties in relation to energy, postal services, transport, and water and sewerage. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers.
- 1.3 As a key stakeholder of the Utility Regulator (UR) and the statutory representative of consumers in Northern Ireland, we welcome the opportunity to respond to this consultation.
- 1.4 The Consumer Council supports the overall approach that UR is proposing and the consumer-centred approach to the draft Corporate Strategy, however, we would have welcomed more detail on the outcomes and impacts of the 2014 – 2019 Strategy and on the proposed outcomes and targets for 2019 – 2024.

## **2 Consumer Principles**

- 2.1 During 2018 we have been more explicit in our use of the 'Consumer Principles'. These are a suite of internationally recognised principles that we use to assess the consumer interest and form a consistent framework within which our policy is developed and communicated.



2.2 While we are pleased that UR has cited Consumer Principles in the draft Corporate Strategy, it is disappointing that the Strategy cites Citizens Advice Scotland’s version of the principles rather than The Consumer Council version, given the engagement we have had with UR in this area. Indeed, The Consumer Council presented on the Consumer Principles at the UR Consumer Protection Summit in April 2018. We would like to see UR and using the ‘Consumer Principles’ as one of the tools to assess how well you are meeting the needs of consumers within your work during the 2019 – 24 Corporate Strategy time frame and would welcome the opportunity to engage with UR further on this.

### 3 Corporate Strategy

3.1 We welcome the focus of the approach document on consumers. As the paper notes;

“Starting with the consumer is paramount and consumers’ needs will be at the centre of our strategy”

We commend UR’s focus on the consumer and would seek commitment that this assertion will be result in appropriately resourced consumer-focused projects, in particular those linked to the Consumer Protection Programme.

- 3.2 We would encourage UR to ensure that in looking at the proposed outcomes of the Corporate Strategy more interaction with consumers with regard to what they need and how these needs are delivered will be undertaken. Monitoring satisfaction and compliance is essential, however a co-production approach of working with consumers and their representatives will yield better results at an earlier stage. Identifying key success outcomes is a start but these outcomes require targets to ensure enhanced service delivery is achieved.
- 3.3 Ensuring markets work for consumers is essential and the commitment to monitor the market and tackle non-compliance is welcome. The Consumer Council would encourage UR to use stronger language and a stronger commitment to enforcement than is currently used in the Strategy document.
- 3.4 While accepting that promoting effective competition is good for consumers, it is disappointing that the draft Corporate Strategy at no point indicates protection in the form of affordability. According to The Consumer Council Insight Survey, expenditure on home energy is the second biggest concern for Northern Ireland households after rent and mortgage<sup>1</sup>. The cost of energy is the biggest concern for low income households, rural households and for those consumers with a disability. As UR has stated that “the consumer is paramount and consumers’ needs will be at the centre of our strategy”, affordability should play a key role in the organisation’s strategic direction for the next five years.

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<sup>1</sup> <http://www.consumercouncil.org.uk/sites/default/files/2018-09/Consumer%20Insight%20Survey%20-%20March%202018%20-%20YouGov%20Summary%20Report.pdf>

- 3.5 The draft Corporate Strategy has identified that working in partnership with industry and government will be needed to achieve the outcomes identified. We would encourage UR to explicitly identify consumer representatives as partners in their Strategy. Meaningful engagement with these groups will ensure better design and delivery of programmes and will result in better outcomes for consumers.
- 3.6 With regards to a new external communications strategy, we welcome the development of digital channels to share information in a more accessible format and are happy to work with UR on this. We would however emphasise that communication is a two-way process and would encourage UR to indicate how it will develop meaningful engagement with consumers and their representative over the lifespan of the Corporate Strategy.

#### **4 Conclusion**

- 4.1 We welcome the opportunity to provide feedback to UR of the draft Corporate Strategy and look forward to working together during the lifespan of the Strategy.
- 4.2 We value the strong working relation with UR and look forward to further developing this relationship of the period of the Corporate Strategy.



Floor 3

Seatem House

28-32 Alfred Street

Belfast

BT2 8EN

Freephone: 0800 121 6022

