

3 December 2012

Dear Colleague

Thank you for inviting the Communications Consumer Panel to comment on the proposed approach for the Citizens Advice service outlined in the *Consumer Future: Changing the world where it matters most for consumers*.

In September, we responded to the proposed design principles for a Regulated Industries Unit (RIU) noting that the Panel wholeheartedly supports the RIU's development along the lines expressed and appreciating that these incorporated many of the points that we outlined in our response to BIS' earlier consumer landscape consultation.

As you know, we expressed our belief in the follow general principles of consumer advocacy:

The consultation proposes that the existing consumer advocacy functions in a limited number of different sectors should be brought together under Citizens Advice, possibly in a Regulated Industries Unit (RIU). The benefits that the proposal indicates might flow from this reorganisation include being able to draw upon Citizens Advice's local network, to identify issues emerging from consumer complaints and the ability to look across sectors at common issues, such as switching, poverty and disadvantage. We believe that effective consumer advocacy in the communications sector needs to be founded on the following principles.

The consumer advocacy body should have:

- *the right to be consulted by regulators at an early stage before policy options are hard-baked;*
- *the capacity to look at emerging issues and research in order to shape policy with regulators and Government and to forestall citizen and consumer problems before they arise;*
- *strong links with consumer advocacy bodies in the Nations, which we understand might adopt different models depending on their specific circumstances and the existing institutional arrangements;*
- *the powers to call for information and initiate 'super complaints' that Consumer Focus currently have;*
- *sector-specific expertise and involvement, especially in a complex sector like communications;*
- *adequate resources/secure funding; and*
- *a focus on efficiency - demonstrating real value for money.*

We look forward to continuing to work closely in partnership. In both our areas of work, it is vital that we protect and promote the interests of citizens and the inactive, silent or more vulnerable consumer- as well as those who are more engaged. Of course, as part of this, there remains a strategic requirement to be cognisant of emerging issues as well as reacting to more immediate ones.

We would support the provision of advice and information to develop policy and practice, in addition to campaigns and for intelligence to be shared widely amongst the relevant stakeholders. We trust that the intended partnership working will further support the sharing of consumer education resources.

The Panel is also particularly concerned that the current economic climate is likely to impact adversely on small businesses (which form part of the Panel's remit) in addition to risking a detrimental impact on companies' customer service provision.

Yours faithfully

Jo Connell OBE DL
Chair - Communications Consumer Panel