



House of Commons
Welsh Affairs Committee

Representation of consumer interests in Wales

Seventh Report of Session 2010–12

Volume II

Additional written evidence

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The Welsh Affairs Committee

The Welsh Affairs Committee is appointed by the House of Commons to examine the expenditure, administration, and policy of the Office of the Secretary of State for Wales (including relations with the National Assembly for Wales).

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The Reports and evidence of the Committee are published by The Stationery Office by Order of the House. All publications of the Committee (including press notices) are on the internet at www.parliament.uk/welshcom

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Additional written evidence may be published on the internet only.

Committee staff

The current staff of the Committee is Adrian Jenner (Clerk), Anwen Rees (Inquiry Manager), Jenny Nelson (Senior Committee Assistant), Dabinder Rai (Committee Assistant), Edward Bolton (Committee Support Assistant) and Jessica Bridges-Palmer (Media Officer).

Contacts

All correspondence should be addressed to the Clerk of the Welsh Affairs Committee, House of Commons, 7 Millbank, London SW1P 3JA. The telephone number for general enquiries is 020 7219 3264; and the Committee's email address is welshcom@parliament.uk

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Written evidence

Written evidence submitted by Professor T H Pennington

SUMMARY

Consumer Focus Wales has played a very important role in driving the implementation of the recommendations of my Public Inquiry into the 2005 South Wales *E.coli* O157 outbreak. I consider it vital that its work in this regard continues, preferably by the organisation remaining in being, or, failing which, an effective transfer of its skills in this regard to Citizens Advice.

PERSONAL DETAILS

I am Professor of Bacteriology (Emeritus), University of Aberdeen, and a Fellow of the Royal Society of Edinburgh, the Academy of Medical Sciences, the Royal College of Physicians of Edinburgh, and The Royal College of Pathologists.

1. I note that the Government's favoured response is that the Citizens Advice Service should be the publicly funded consumer champion and that for general advocacy work funds would be transferred to it that otherwise would have gone to Consumer Focus for this purpose. I also note that the Government believes that the influence on the policies of Government and regulators would be more effective if delivered as a single, seamless message.
2. I chaired the Public Inquiry into the 2005 *E.coli* O157 outbreak in South Wales. My main concern after publication of my report was that sufficient attention be paid to its recommendations. This concern was put to rest by the establishment of the Consumer Food Safety Group, a forum led by Consumer Focus Wales. The independent status and expertise of Consumer Focus Wales enabled it to act as an "honest broker" and push forward the implementation of my recommendations—as well as using this opportunity to drive the consideration and implementation of other food safety measures. (See the report "Protecting consumers from *E.coli* O157": Progress on implementation of the Pennington Report in Wales, March 2010). The initial impact of the Consumer Focus initiative was greatly strengthened by it being a Welsh organisation working in Wales. It has now had very beneficial outcomes throughout the UK.
3. I regard the work of Consumer Focus Wales in this regard as exemplifying advocacy work at its best. I do not think that Citizens Advice has expertise in this area and I consider that for this work to continue the best solution would be to leave Consumer Focus Wales as it is. I consider that its work has already made a significant contribution towards Wales having the most effective and efficient food safety systems in the UK.
4. However, if the two organisations are joined it is essential that the strength that Consumer Focus has established in this field and the links it has established with others be transferred to and maintained in Citizens Advice.
5. Better food safety pays. I point out that the 2011 Food Standards Agency Chief Scientists Annual Report gave the estimated annual cost of foodborne illness in England and Wales in 2009 as £1.762 billion. I believe that the food safety initiatives stimulated by the ongoing work of Consumer Focus Wales will lead to a significant reduction in this burden in Wales and in the UK as a whole.

September 2011

Written evidence submitted by Rachel and Tim Jebbett and John Purvin

SUMMARY

- Details of submitters.
- Factual Information.
- The need for improvement of mobile (park) home regulation.
- The work of Consumer Focus Wales to improve mobile (park) home regulation.
- The importance of the work.
- Examples of real issues.
- An assessment of future possibilities.

SUBMISSION

1. Submitted by

Mr Timothy Jebbett, Mrs Rachel Jebbett and Mr John Purvin. All residents on a mobile (park) home site in Powys.

2. Factual information

2.1 The consultation paper issued jointly by Communities and Local Government and the Welsh Assembly Government in 2008 under their New Approach for Resolving Disputes Relating to Park Homes, estimated that there are 2,050 park home sites in England and Wales housing 170,000 residents, and stated that it is a valued part of the housing market and the Government attaches great importance to a well run sector.

2.2 Graham Watts of Park Home Legal Services Ltd. (to the best of our knowledge the only independent expert on park home legal matters), was, up to 2004, a “stakeholder” to the then Office of the Deputy Prime Minister now the Department of Communities and Local Government, to create legal remedies to tackle recurring problems. His input was totally ignored and he wasted six years “unwittingly assisting the Government to produce legislation that would never be applied”.

2.3 In his party conference speech last week Deputy Prime Minister Nick Clegg repeatedly emphasised his commitment to doing the right thing, not the easiest thing.

2.4 Ignorance concerning the nature and character of park home living abounds. A knowledgeable and much respected associate of ours of four years standing, in this very small rural community, last week referred to our park as a “campsite”.

3. Desiderata

3.1 We believe that despite the Government’s declared opinion that most park home site operators are fair and honest, there are widespread instances of criminal activity involving such methods as intimidation, fraud, deception, verbal and physical abuse of residents, many of whom are elderly and vulnerable. Statistics resulting from a recent nationwide questionnaire conducted by Dorset park resident, Mrs Sonia McColl and her “Park Homeowners Justice Campaign” (aided by Annette Brooke MP) go a long way towards disproving the Government’s view. These issues should be recognised by those in power and legal steps taken to rectify the problem permanently.

3.2 The anger felt by park home residents is because officialdom in the main ignores any issues arising on parks run by rogue owners. But this minority (the word with which Westminster excuses itself from responsibility) are vicious, unscrupulous, arrogant, greedy beyond measure, and champions of the apathy of governing/regulatory bodies in this area of the law. Many local councils are not interested, even in the enforcement of their own park site licences, many breaches of which are ignored (*there are such issues on our park*).

3.3 Councils to publish up to date watertight site licences and Government to change the law to impose on local councils the duty to enforce them, with support in place from police and/or any other agency enabled to give appropriate support when the need to confront unpredictable, violent, abusive park owners arises. The present situation is that councils have the power to enforce, but not a duty so to do. We are subject to council tax demands and all other requirements relating to law and order responsibilities, but receive none of the benefits, such as protection from crime or personal respect as full members of the local community, which are automatically granted to those living in “real” houses.

3.4 Police education—the Mobile Home Act is British law as are the laws relating to murder, motoring offences, burglary, blackmail, etc. The Police understand the latter but choose to consider transgressions of the Act as civil matters because the land on which our homes are sited is the private property of the owner, even though we have entered into a legally binding contract with him when purchasing our homes and pay a monthly fee for tenure of the pitch.

4. Consumer focus Wales

4.1 Became involved with park home issues through the aegis of Kirsty Williams AM/AC our Welsh Government Assembly Member. They met her, we believe, to discuss housing matters unconnected with park homes but she introduced the issues which her constituents had raised concerning park home sites and it started from that point.

4.2 Up to the present time, Consumer Focus Wales has been the only agency to be genuinely sympathetic to our problems and they have initiated excellent and hopefully supportive contacts with Welsh Government Assembly Members, Members of Parliament, Senior Police Officers, Trading Standards and other local council departments.

5. Why is this work so important?

5.1 We believe that there is an urgent need for a fundamental overhaul, redrafting and robust enforcement of the Mobile Home Act 1983 and its subsequent amendments. As it now stands this law is weak and ineffective and gives much scope for unscrupulous site owners to sidestep the rules. Indeed, one prominent member of the Judiciary (His Honour Peter Collier QC the Honorary Recorder of Leeds) has said that it is the worst piece of legislation he has ever seen and furthermore, it bears no relation to conventional property law.

5.2 A judge in an arbitration case in England between park home resident and park owner, was reported to have withheld judgement because he was obliged to admit that he knew nothing about park home law.

5.3 Until Consumer Focus Wales came along, we had been unable to convince anyone in authority of the weaknesses of the Act and the common abuses of it by unscrupulous park owners.

6. *Some examples*

6.1 One common abuse of the Act is the deliberate blocking of sales. The Act gives a resident the right to sell the home on the open market. Unfortunately, the Act also allows the site owner to “approve” the buyer; the Act decrees that “this approval shall not be unreasonably withheld”. An unscrupulous site owner will find some excuse for his refusal, or commonly, he will contact the buyer himself and “put the buyer off” by giving information which is often untrue: for example that the home is in a poor state of repair or that the current owner owes him money. This is never true as the money he considers is owed to him has been unlawfully demanded by him. *This has happened at least twice in the recent past on our park.* The purpose of such activity is to place the seller in such a state that he will, in desperation, sell his home to the site owner for a value much below the market price, then consequently, the site owner can sell it on for a huge profit. *An example of this has recently taken place on our park.* Another common “excuse” is that it must be moved in order to repair the base under the home and this may cause it to fall apart. Our site owner used just this modus operandi to dissuade potential buyers of a home on one of his parks in the Wolverhampton area. His activities were exposed by the Radio 4 programme “Face The Facts” and happily for the seller (an old lady who needed to go into care) the case was determined in her favour by Walsall Magistrates Court which fined him in excess of thirty thousand pounds.

6.2 In 2010 the Crown Prosecution Service rejected a police application to hear a case involving assault by our park owner on our 75 year old neighbour. The site owner deliberately spat in his face and his son has been reported as doing the same to an old lady on another of this individual’s parks.

6.3 During a recent police investigation into an incident on our park an officer admitted in his typed report to “not being too good on the Mobile Home Act”.

7. *The future?*

7.1 It is difficult to envisage work of this nature being undertaken by a voluntary organisation such as Citizens Advice whose role seems simply to be to direct those seeking advice to other agencies. To whom will Citizens Advice successfully refer the victims of intimidation, harassment, violence, deception, fraud, theft and slander?

7.2 Citizens Advice’s 2010–14 Strategy states that it will need cash injections of millions of pounds to implement its plans for the near future. Consumer Focus Wales is currently achieving resourceful, meaningful results with striking efficiency and economy, to combat the presently uninterrupted rise in the level of criminality in this housing sector. This stunning achievement must not be squandered by ill-conceived, random cost-cutting exercises.

September 2011

Written evidence submitted by Thrive

My name is Greg Brown and I work as the Lead Organiser for an organisation called Thrive. Thrive is an independent charity (no. 1125676) working in Teesside, North East England. We have done lots of research into how people “get by” on a low income and found that lots of people were using hire-purchase, or “rent-to-buy”, companies like Brighthouse, Perfect Homes and Buy As You View. We have found that the people using these companies are paying a lot more for basic household essentials and have also been dissatisfied with a number of factors, including unclear financial statements and agreements, not knowing when they owned their products, poor customer service and concerns about some collectors.

I am writing to the Committee to express my grave concerns about the proposals to abolish Consumer Focus Wales and transfer some of the work it undertakes to Citizens Advice.

I understand that the UK Government is consulting on the plan to abolish Consumer Focus and I can see from that document that the Government is open to adopting different approaches in Wales and Scotland. What I fail to understand is why the possible different solution for Wales is not being looked at before the UK consultation actually ends.

I was contacted by the investigations team at Consumer Focus in early 2011. I was informed that the team were investigating issues in the “rent-to-by” market and that the team had established a working relationship with one of the major players in the market, Buy As You View, based in Swansea. Due to the team being based in the Cardiff office of Consumer Focus Wales a good working relationship had also been established with Bridgend Trading Standards. Bridgend Trading Standards are the department who are responsible for consumer protection enforcement and education for Buy As You View, as the company falls under the geographical jurisdiction of Bridgend County Borough Council.

In order to tackle the serious issues in this market a working group was established with representatives from Thrive, which included customers of rent to own companies; Consumer Focus and the Office of Fair Trading; and rent to own firms, including Buy As You View. In order for this group to truly be effective it was vital that the consumer voice was heard at meetings and real life experiences were directly shared with the rent to own firms.

I explained to the investigations team that I was experiencing difficulties in sourcing case studies for the working group. I was told by the team that Consumer Focus had a Memorandum of Understanding with the Office of Fair Trading which allowed Consumer Focus access to the Consumer Direct Database. Consumer Focus is able to search the Consumer Direct database to firstly establish the extent of consumer problems in particular sectors or markets and secondly to ascertain details of individual complaints. We agreed that Consumer Focus would write to individuals asking them to get in contact with Thrive in order to share their stories of using rent to buy firms. The level of response received was staggering (I have a sizeable dossier of evidence from all across the UK and fielded many calls over a month subsequent to the sending out of the letter).

I was contacted by consumers' throughout Great Britain. This is something that Thrive could not have possibly achieved without the help of Consumer Focus. The case studies were from a particularly vulnerable low-income / financially excluded background and the way Consumer Focus supported them into this process was invaluable. I firmly believe that they wouldn't have been able to influence the policies and practices of the rent-to-own companies in the same way through any other mechanism. These case studies were subsequently used to inform discussions at the working group. Whilst our local Citizens' Advice do an excellent job dealing with people's debt cases individually, challenging powerful companies in this sector directly is also something that they would not have been able (or possibly willing) to do either.

As a direct result of this work, the working group has asked the Consumer Credit Trade Association (CCTA) to work with its members operating in the rent to own sector to develop an addendum to the existing CCTA code of practice that drives up standards and meets current consumer concerns. More generally the working group has requested that the CCTA also considers how such an addendum could be publicised to consumers and how compliance could be monitored.

I am convinced that without the invaluable support and information provided by the investigations team in Cardiff, I would never have had the important "ammunition" for the meetings and my concern is that if Consumer Focus is abolished, that consumers in Wales and the rest of Great Britain will lose out.

September 2011

Written evidence submitted by Sharon Mills

To introduce myself, my name is Sharon Mills and my relationship with Consumer Focus Wales began some four years ago after the tragic death of my five year old son Mason. Mason contracted E.coli during the 2005 outbreak in SouthWales. During these last four years Consumer Focus Wales have worked so hard to help try to improve food safety to give us, the Consumer, a voice and most importantly to supply us with the information we so desperately need to call for change. The support that my Family and I and other victims of this outbreak as received from Consumer Focus Wales as been overwhelming and for that we will all be eternally grateful.

I am concerned about the proposals to abolish Consumer Focus Wales and transfer some of the work it undertakes to Citizens Advice.

The UK Government is currently consulting on these proposals and having read the consultation it says that they are open to different approaches in Wales and Scotland. I find it difficult then to understand why this Bill to abolish the organisation is being debated in detail and will be likely to pass before the results of the consultation exercise are known. If the UK Government is open to a different solution in Wales and people in Wales say that this is what they want I would question what options there would then after the Bill has passed for a different solution to be delivered, if the organisation has already been approved to be abolished?

What is important about the way in which Consumer Focus Wales works at the moment is that it listens to people and organisations from across Wales in deciding what work to focus on. It doesn't rely on listening to the people that only use one particular service or have problems in a certain area, it works across a broad range of public and private sectors based on where it identifies that there are problems and that they can make a difference.

That is one of my concerns about Citizens Advice being the organisation identified to take on some of the work of Consumer Focus in Wales.

Consumer Focus Wales role in raising awareness of food safety issues in Wales and ensuring that action has been taken to learn from the lessons of the 2005 outbreak of E.Coli O157 in South Wales has been absolutely vital to hold the agencies who have a role to play in this to account. If it wasn't for Consumer Focus Wales no one would be monitoring who had taken action to implement the key recommendations made by Professor Hugh Pennington as part of his inquiry into the outbreak. No one else was in a position to be independent

enough to do this because the Food Standards Agency, Welsh Government and local authorities all had recommendations aimed at them.

If it wasn't for Consumer Focus Wales the profile of food safety would not have been raised over the past two years, significant advancements in implementing these recommendations wouldn't have been made or reported and most importantly myself and other families would continue to be in the dark about what action was being taken to ensure no other family has to go through what we have been through.

The work that Consumer Focus Wales has done has achieved so much that will make real and meaningful changes to how people in Wales feel about the safety of their food, both in terms of changes that people can see and are now aware of, like getting the Welsh Government to agree to introduce mandatory display of food hygiene ratings within food hygiene businesses so people can make informed decisions about where they eat, but also the changes behind the scenes. They have for instance encouraged the Food Standards Agency to clarify the law on the separation of raw and cooked food, over which there was a lot of confusion amongst food businesses, they have clarified the confusion local authorities in Wales had over some of Professor Pennington's recommendations around the need for effective food hygiene management systems (including how and when to use HACCP—the Hazard Analysis Critical Control system) and their work has led to the First Minister announcing a review of food safety law in Wales, which I believe has now been extended across the UK. Consumer Focus Wales has been a strong voice for any consumer in Wales who eats outside of the home.

I believe that Citizens Advice identify problem areas to work in as a result of the people that they provide advice to. Food safety is not the type of issue that someone would ever seek advice about through this type of service. Therefore there is a real danger and significant risk that if Citizens Advice are the organisation to be responsible for representing people in Wales in future, this type of important work and work like it, just won't get done.

I am firmly of the belief that if this work had not been carried by Consumer Focus Wales then the Consumers would be none the wiser of the serious risks we are still facing with very little or no improvements being carried out.

I would like to see then if the UK Government is serious about being open to doing something different in Wales that if that is what people in Wales want and I think the Welsh Government want, there is a way to allow that to happen even after this Bill has passed.

I would like to see this Committee asking the UK Government how it will make provision for a different solution in Wales and to make sure that this is still possible after this Bill has passed.

I feel very strongly that the organisation that represents consumers like myself in Wales should be based in Wales and answerable to people in Wales through their representatives in the National Assembly. I also think that the organisation should be able to work on any issue where they identify there are issues for people in Wales relating to private businesses or public services, or both as in the case of food safety. I also think that organisation needs to be properly funded to ensure that it has a strong voice and can make itself heard on behalf of the people of Wales.

I'd like to ask you to make sure that that can happen so we can have a body that we can have confidence that will stand up and deliver for Welsh people like Consumer Focus Wales has done.

September 2011

Written evidence submitted by Shelter Cymru

SUMMARY

- Independent advocacy for disadvantaged and vulnerable people must not be weakened in the current economic climate.
- Consumer Focus Wales has been a valued statutory partner, enabling work to be done on issues that have fallen between remits, or beyond resources, of third sector organisations.

OUR SUBMISSION

1. Shelter Cymru welcomes the opportunity to submit evidence outlining our concerns over the proposed abolition of Consumer Focus Wales.

2. We believe that the current economic climate is an inappropriate time to lose a source of independent advocacy with a remit to defend the interests of vulnerable and disadvantaged people. Financial problems and homelessness are widely predicted to increase due to reform of the welfare benefits system, reductions in public spending and rising fuel prices, with corresponding impacts on public health and social exclusion. People on low incomes are predicted to bear the brunt of austerity measures, with a six per cent drop in income among the lowest 20% of earners, compared with a four per cent drop for the highest 10% of earners, according to the Institute of Fiscal Studies.

3. Third sector organisations such as Shelter Cymru are facing significant challenges, coping with reductions in income and consequent job losses at a time when the urgency of our work is increasing, both in terms of casework and campaigning. Our concern is that, at this critical time, the loss of Consumer Focus Wales may result in a weakening of the citizen/consumer perspective in policy formation at Welsh Government level.

4. Consumer Focus Wales has provided an authoritative voice for vulnerable and disadvantaged people in Wales and, thanks to its general remit, has addressed issues that fell between the remits of other non-statutory groups. Their ongoing Park Homes project is an excellent example of a piece of work requiring resources way beyond the capacity of the majority of third sector organisations, which has the potential to lead to significant improvements in circumstances for a group of people who have struggled to defend their interests alone. Furthermore, Consumer Focus Wales recently commissioned Shelter Cymru to investigate financial exclusion among young people leaving care, a piece of work which would not have been carried out without Consumer Focus Wales' attention to this issue.

5. The advent of full law-making powers for the Welsh Government has brought with it an increased need for policy advocacy. This cannot be effectively provided from London and demands expertise at a Wales level. Our overriding concern is that any new arrangement of consumer representation may not take the new devolution context into account and hence overlook the unique set of pressures faced by citizens in Wales.

6. We believe the UK Government should consider a different solution for Wales that is accountable to the people of Wales through the National Assembly, and should amend the Public Bodies Bill to allow for this.

September 2011

Written evidence submitted by the Welsh Refugee Council

1.1 The Welsh Refugee Council was established in 1990 and now employs 32 staff and has 60 volunteers. Its head office is in Cardiff and it has offices in Newport, Swansea and Wrexham. In 2010–11 it provided 22,366 advice sessions to asylum seekers, and provided nearly 7,000 advice sessions to refugees. As well as providing advice services to asylum seekers and refugees it has an influencing role and function. It receives funding from the Welsh Government, UK Border Agency, Diana Fund, Children in Need, Community Fund and Lloyds TSB Charitable Trust.

1.2 We are pleased to respond to the Welsh Affairs Committee Inquiry into the representation of consumer interests. The people we work for have a range of issues, which need responding to effectively. We are active supporters of a One Stop Shop approach to advice and other provision. We therefore strongly support the proposal to incorporate the work of Consumer Advice into the broader work of Citizens Advice Bureau.

1.3 The advantage of the CAB approach is that they combine the experience of people directly facing the issue with a strong policy and campaigning arm.

Each of the relevant Bureaus in Wales is connected to our specific offices. Through local offices we are able to respond to local needs, resolve them or feed them through the advocacy mechanisms of both organisations.

CAB has a strong record of supporting the most marginalised in society through their direct and indirect work. We therefore welcome these proposals.

In addition, we would like to make the following comments:

We welcome any proposals that align governance and funding with the role and remit of the Welsh Assembly. Its continued focus on social justice will be central to ensuring that the incorporation of the role of one organisation into another will allow the best service provision, both locally through CAB and also as part of a phone advice service.

We are aware of the work that CAB has done on developing comprehensive databases and it will be helpful to have one "record" which covers all the complex issues which are presented to CAB's. The opportunity for one data set with the ability to cross reference, so that people receive a holistic advice service, is to be welcomed.

One of the advantages of Citizens Advice is that it has a well respected UK Parliamentary presence and "Welsh" issues can become "UK" issues very quickly. Any organisation committed to social justice and the empowerment of individuals sees these proposals to absorb the work of consumer focus into that of CAB as a welcome development, which will be better for the customer, be cost efficient and provide a range of interventions suitable to individuals and groups needs.

We therefore welcome these proposals, so that the citizens of Wales receive a comprehensive, holistic and quality service once these proposals are enacted.

September 2011

Written evidence submitted by Ingrid Gubbay

My name is Ingrid Gubbay, currently a senior associate at the law firm of Hausfeld & Co LLP practicing mainly public, competition and consumer law. I was formerly principal legal advisor of the campaigns section of the Consumer Association *Which?* I wish to express my concerns about the proposals to abolish Consumer Focus Wales and transfer some of the work it undertakes to Citizens Advice.

I know that the UK Government is consulting on the plan to abolish Consumer Focus and I can see from that document that the UK Government has indicated that it would be willing to consider different options in Wales and Scotland. I therefore do not understand why the possible different solution for Wales is not being looked at before the UK consultation actually ends.

I was instructed by the investigations team based in the Consumer Focus Wales office in 2010. My firm advised the team and senior director in relation to the overcharging claims being made by consumers against Npower. Together, we concluded that under sections 11 and 23 of the Consumers, Estate Agents and Redress Act, Consumer Focus could pursue legal action against Npower for the losses sustained by customers after npower breached its customer agreements. At its most basic, Section 11 allows Consumer Focus to investigate serious consumer complaints, while Section 23 confers on the body a "supplementary power to do anything (other than borrow money) which is calculated to facilitate, or is incidental or conducive to, the exercise of any of its functions".

It was decided that the terms of Section 23 were broad enough to include commencing proceedings as well as taking out insurance against potential costs. The investigations team took part in joint without prejudice talks with the energy team in Consumer Focus. Once the positive advice about being able to take legal action had been obtained, Npower agreed to repay all of the overcharges to its many millions of customers.

The two sides agreed that affected consumers would receive an average of £35 each, making a collective refund of £63 million plus VAT and interest, in contrast to the first Ofgem-negotiated collective refund of £1.2 million. Npower informed around 1.8 million affected customers last year, and individual payments ranged from £1 to £100. Of this figure, I am told that about £5 million was due back to consumers based in Wales.

Without the legal support and work of the investigations team in Cardiff, it is unlikely that Npower customers would ever have received the level of compensation that was eventually secured. This in turn would have meant that Welsh consumers would not have recovered millions of pounds. The very broad powers that Consumer Focus has meant that it could take a very firm position with a major energy supplier. That combined with the legal and energy expertise that Consumer Focus has built up over many years brought Npower to the table in a way that I do not believe Citizens Advice would have been able to do given the lack of resource and its legal enforcement powers.

The investigations team based in Consumer Focus Wales but working for the organisation across Great Britain has a very broad remit and can investigate any consumer issue which raises a question of general importance. It is crucial that this breadth of work be retained.

September 2011
