



Co-operative Party Policy Brief June 2014

consumer affairs & co-operative development

the co-operative party

politics for people

This Policy Brief summarises the Co-operative Party's policies on consumers affairs and co-operative development, drawn from the Party's national manifestos and the work of co-operative movement organisations and individual submissions to the first round of the 2014 policy process. More information is available on www.party.coop.

Consumers can be a key driver of the economy, creating demand for goods and services which provide jobs, stimulate innovation, create wealth and tax revenue. In a functioning economy, knowledgeable, informed - empowered - consumers can drive up standards, supply and value for money.

However where there are monopolies, for vulnerable consumers, for non-repeat purchases, where the buyer cannot possibly judge the quality of the product (either because long term outcomes, or the technicality of the product or service), or because it is the environment which makes the difference (like the continuing availability of a universal postal service), then consumers need champions to "stand in their shoes". This is required to ensure real competition and appropriate regulation, be their voice, demand fairness from the providers and ensure adequate redress is available. Consumer harm arising from unfair trading is estimated at £6.6 billion a year: it is a serious and pervasive cost to all consumers¹. This must change.

Which? have argued that the aim of Government in this arena should be to achieve 3 things:

- 1. Empowered, confident consumers:** people are better informed of their rights, able to secure prompt redress (with those less able to engage in markets receiving targeted and appropriate support) and readily able to access top quality, independent, trustworthy sources of information including aids to comparison and switching that support fair dealing firms;
- 2. Effective enforcement:** an effective national body takes prompt and courageous decisions against powerful vested interests, is genuinely collaborative and responsive to the concerns or issues raised by stakeholders and constructive in addressing them. For example, it acts promptly against rogue traders, takes action to address market structure, reaches decisions as promptly as practical in a manner that facilitates redress and is not 'precious' about prioritisation or hostile to super complaints;
- 3. Competitive markets:** fair dealing firms are supported and lauded, driving out the bad, and raising standards for transparency, fairness and sales practice, with markets open for new entry (at all scales) and exit.

The Co-operative Party endorses this approach. In particular the recognition that an effective competition regime and effective consumer protection are intrinsically linked. That is why it is key that under Ed Miliband Labour has identified the urgent need to ensure that the appropriate balance of power exists between companies, employees and consumers as part of the goal of ensuring a more 'responsible capitalism'. We also need to do the same for citizens, as consumers of public services.

¹ Protecting Consumers - the system for enforcing consumer law, June 2011, National Audit Office (HC1087).

The role of the Co-operative Party as a champion for consumers

The Co-operative Party has a long and proud tradition as the political voice of consumers. In 1947 Harold Campbell, the Co-operative Party Assistant Secretary, wrote that “The Co-operative Party advocates the sovereignty of the consumer. It declares that the state should be controlled in the interests of the consumer as a co-operative society is controlled in his interests...”²

To this day it is legislation passed by Labour Governments (championed by Co-operative MPs including George Darling and Joyce Butler) which form the basis of modern consumer protection. It was the Co-operative Party's lobbying that led to the 1961 Consumer Protection Act, the Weights and Measures Act 1962 and the Hire Purchase Act 1964.

Today it is Labour & Co-operative Parliamentarians like Stella Creasy MP and Baroness Dianne Hayter who are playing a key role in championing the cause of consumers. They are achieving vital commitments that a future Labour Government will cap the overall cost of credit and increase levies on payday lenders. They will also give people the right to challenge debt management and payday loan contracts that have the effect of pushing them further into debt by making these conditions challengeable in court.

Recent improvements in consumer rights

European regulations have ensured important gains for consumers in recent times. The recent **The Consumer Rights Directive (CRD)** was passed by the EU in October 2011. The CRD comes into force in all EU member states in June 2014. It aims to simplify consumer rights in certain important areas, mostly relating to buying and selling.

Before they buy:

- consumers should get clear information before they buy: this also applies to ‘distance selling’ – selling over the phone or the internet

While you're buying:

consumers shouldn't pay excessive fees (such as excessive credit card fees) when paying a seller – regulations that prohibit traders charging consumers ‘above cost’ payment surcharges ([The Consumer Rights \(Payment Surcharges\) Regulations 2012](#)) came into force on 6 April 2013

After you buy:

- if you've bought away from a trader's place of business - over the internet, or in your own home for example - you get the right to an increased ‘cooling off period’ of 14 days after buying
- no excessive phone charges when you ring a seller about an existing contract

Additional payments:

- no additional payments unless the consumer expressly agrees to them³

² Quoted in Rosen G (2007) *Serving the People: Co-operative Party history from Fred Perry to Gordon Brown*. The Co-operative Party.

³ <https://www.gov.uk/government/policies/providing-better-information-and-protection-for-consumers/>

The forthcoming **Alternative Dispute Resolution (ADR) Directive** refers to schemes that are available to help complainants resolve disputes outside court. If the parties involved in a dispute are unable to settle their differences, ADR offers a quicker and cheaper means of dispute resolution.

The main objective of the Directive is to give European consumers greater access to redress should something go wrong with the purchase of goods or services. There is currently a mixed approach to ADR in the UK. There are some well established schemes in regulated sectors where the use of ADR is compulsory, such as the Financial Ombudsman Service. In many other sectors businesses can choose to use ADR. This is often linked to membership of a trade association. ~~Because of~~ This mixed approach means that access to ADR is not guaranteed.

The ADR Directive means the government has to fulfil certain requirements, like ensuring ADR is available for all contractual disputes between a consumer and a business and that ADR providers meet certain quality standards. Government has until July 2015 to implement the reforms. The Co-operative Party agree with Which? it is a shame that some measures, especially on Alternative Dispute Resolution (ADR), are

not included in the current Consumer Rights Bill⁴. As they point out, given the implementation of the EU ADR Directive will occur at the same time as the Consumer Rights Bill implementation, the opportunity must not be missed to discuss issues such as the creation of a streamlined Consumer Ombudsman with the capacity to deal with any consumer-to-business dispute.

Competition and Markets Authority (CMA)

The Competition and Markets Authority came into being in October 2013. Its mission is to make markets work well in the interests of consumers, businesses and the economy. The CMA is the product of a merger of the Competition Commission and Trading Standards.

The Co-operative Party welcomes the creation of the CMA but believes that it is vital that the CMA is responsive to consumer concerns, acts on the priorities of consumers and works closely with other consumer champions. Therefore we support Labour plan to introduce an Annual Competition Health Check, led jointly by consumers and the competition authorities, to ensure regulators and politicians act where markets do not work in the public interest. We also support the plan to ask the consumer bodies including Which? and Citizens Advice to produce jointly with the Competition and Markets Authority and other statutory bodies an annual report that sets out both key competition issues in UK private markets and priorities for action. Some action will be for regulators, like the CMA, but some will be for Government. This will force a response to the report, ~~and~~ to set out how it is intended to tackle the issues raised.

Consumer Rights Bill 2014

The Co-operative Party welcomes the aims of the Consumer Rights Bill which the Coalition Government introduced into Parliament earlier this year. The Bill brings consumer law into the 21st century, extending rights into digital content for the first time, and making it easier for people to understand their rights and challenge bad practice. The Bill provides a ~~firm~~ foundation for empowering consumers and will benefit businesses that treat their customers fairly.

[supporting-pages/implementing-the-consumer-rights-directive-2011-83-eu](#)

4 Which? Briefing on Consumer Rights Bill 2014, House of Commons 2nd Reading. 28 January 2014

The Bill makes the following changes:

- Guarantees a right of refund if a good is returned within 30 days or a depreciated value if good is returned within 6 months
- Offers consumers a right to repair / replacement, effectively giving traders one shot to resolve a problem before a full refund is offered on returned items.
- Classifies digital content to treat it as a good in its own right and regulates its sale
- Consolidates existing legislation on unfair terms
- Allows trading standards to cross local authority boundaries
- Provides limited capacity for class action suits by consumer representative bodies and trade organizations

However, a more radical approach is what is really needed to genuinely re-dress the balance between companies and consumers.

A real consumer revolution

In particular the Co-operative Party believes that more fundamental reform is still needed in the following areas:

Tackling Broken Markets

Healthy, fair and competitive markets and effective methods for information sharing are vital if we are to build an economy that works for both consumers and businesses.

One of the clearest examples of this is in energy. In our energy markets six companies, all of which were originally regional monopoly suppliers, dominate the retail market in the UK. Together these companies supply 98 % of the domestic market and 82 % of the smaller business market. The fact that no new entrant has managed to challenge this dominance suggest that there are significant barriers for new comers that inhibits competition. This has been reflected in prices too - A lack of competition in the retail market for energy has resulted in consumers paying £3.6m more than they need to each year. The Co-operative Party strongly supports Labour's commitment to reforming Britain's broken energy market and freezing prices for consumers while the reform process takes place.

The Co-operative Party was pleased to note that the Co-operative Energy has welcomed the proposal of an energy price freeze and backed proposals for radical reform of the energy market to provide consumers with more choice⁵.

Accessing Information and Advice

The lack of information available to consumers to allow them to compare goods and services and use this to make their own choices means providers can hide behind confusing information and a lack of transparency about charges.

⁵ <http://www.cooperativeenergy.coop/2013/09/25/comment-from-co-operative-energy-on-the-big-six-objecting-to-ed-milibands-price-freeze-pledge/>

The Government's own research 'Better Choices: Better Deals' argues if consumers were to use price comparison sites effectively they could gain £150-240m a year. A recent EU survey has found that UK consumers show some of the lowest activity in Europe, in terms of comparing prices, reading terms and conditions and showing interest in consumer information. In Australia mass movement switching campaigns have led to 1 in 14 citizens being part of schemes to secure better deals on energy, health insurance and financial services.

It is also vital that price comparison information is provided in a transparent way which supports consumers in making the best choices. Currently, energy comparison sites are unregulated and have been accused of deliberately directing customers to 'commission generating' tariffs eg tariffs provided by companies who pay the sites commission for directing customers to them. Consideration should be given for OfGEM to call regulate the sector or take on the role of providing impartial and transparent advice.

Helping ensure decisions are made right 'the first time' is key to positive outcomes. Yet too often many, especially those with complex needs or a lack of confidence, struggle to get the information they require to be able to make effective decisions. This generates costs to the public purse, both from the poor decision made and the costs of putting this right. Citizens Advice research also demonstrates the benefits of advice. One year on from receiving debt advice, 37,100 clients had one or more debts successfully rescheduled. The average value of debts successfully rescheduled per client was £12,600 A total of £113 million worth of debts successfully rescheduled. When debts are rescheduled, priority debts will be paid first. Priority debts include Council Tax, Local Authority housing arrears and income tax, therefore this form of advocacy creates direct benefits to both local and national government. Need some positive ideas as to how we want to improve access to advice.

Improving Regulation and Redress

An absence of enforcement gives an advantage to firms who break the rules - whether in local communities or nationally, consumers are getting a poor deal and providers are getting away with it as there is little likelihood of accountability or prosecution. Giving consumers a stronger voice within the regulation of goods and services would enable consideration of how the consequences of the different management of services impacts on different groups in society.

The concept of an Ombudsman to investigate and mediate is clear in principle but confused in practice. This is because different Ombudsman services have been set up with different capabilities to secure redress for consumers. Some exist through European and UK statute: eg Housing Ombudsman under s51 Housing Act 1996. However, others have been set up by industries themselves as a voluntary body.

There are at least seventeen different Ombudsman services including the Financial Ombudsman, the Local Government Ombudsman, the Housing Ombudsman, the Pensions Ombudsman and the Legal Ombudsman as well as the Parliamentary and Health Service Ombudsman. In addition to this there are also fourteen recognized complaints handling services including the Advertising standards Authority, the Commissioner for young People, the Information Commissioner's Office and the Schools Adjudicator. This creates a confusing myriad of options which consumers have to try and navigate in order to get access to justice.

In particular there is a growing problem created by separate complaint and redress systems operating in the public and private sectors. With a growing proportion of public services being delivered by private companies, eg in health and social care, this can lead to confusion about how and to whom to complain to when things go wrong. This is unacceptable, in particular when it is some of the most vulnerable members of our society – or their already hard-pressed carers – who have to struggle to find out where to go for help.

This is why the Co-operative Party has called for urgent consideration of the need for a single US Style consumer Ombudsman.

A single consumer Ombudsman

The Co-operative Party believes that the introduction of a Consumer Tsar with US-style powers to prosecute class-action cases against companies accused of ripping off customers could be part of rebalancing the provision of goods and services back in favour of consumers. We have seen the force that TV programmes like Watchdog and the Parliamentary Public Accounts Committee can bring to bear when they shine a light on companies operating in ways that are exploitative, unfair and against the interest of consumers. In addition, the Consumer Champion would also have the 'hard power' to take up class actions on behalf of consumers against companies or the government.

They would also have a key role in educating the public about their rights and how to complain if they consider that their rights have been infringed. Something that is urgently needed.

Consumer Rights in the Public Sector

The Co-operative Party believes that the vast majority of public services are delivered to a high standard and by a public-spirited and dedicated workforce. However, as Ed Miliband recently noted in his Hugo Young lecture

“I meet as many people coming to me frustrated by the unresponsive state as the untamed market. And the causes of the frustrations are often the same in the private and public sector: unaccountable power with the individual left powerless to act.”⁶

Empowering consumers by giving them choices about which services they access and the opportunity to feed back is critical to improving the quality of public services and improving the sense that the public own their public services.

Public services need to use consumer feedback to drive quality improvement. But too few public services have a culture of encouraging and addressing feedback and complaints. Which? research shows people are less likely to complain about public services than in private provision because, they are sceptical that it will result in change, they fear the consequences of doing so for the

⁶ <http://labourlist.org/2014/02/ed-milibands-hugo-young-lecture-full-text/>

quality of their ongoing care, and they are confused by the highly complex complaints system in public services. These are barriers that need to be addressed.

The Co-operative Party notes the recommendations made recently by the Public Administration Select Committee⁷ on modernising the role of the Parliamentary and Health Ombudsman (PHSO) in England and believes they warrant urgent consideration.

- As a priority, the iniquitous restriction on citizens' direct and open access to PHSO, known as the "MP filter", must be abolished, as is already the case in respect of NHS complaints.
- PHSO must be able to receive complaints other than in writing: such as in person, by telephone or online, just as is expected of any normal complaints system.
- PHSO should have "own-initiative" powers to investigate areas of concern without having first to receive a complaint.
- Parliament should strengthen the accountability of PHSO. PASC, along with other Departmental Select Committees, should make greater use of the intelligence gathered by the PHSO to hold Government to account. In the longer term, there is scope to change the way that ombudsman services are delivered.
- A consultation on the creation of a single public services ombudsman for England.
- At the same time, there must be a distinctive ombudsman service for UK non-devolved matters.

[Note: more information about the Co-operative Party's proposals to increase the consumer voice and democratic accountability in health, education, housing and transport can be found in our policy papers on these issues.]

However, whilst consumer empowerment is a necessary driver of improvement in public services it is not sufficient to ensure it. In particular it will not ensure high quality for everyone – given the unequal ability and capacity we have as individuals and communities to make informed choices, demand high quality services and navigate our way to effective redress if it is required. Therefore, it is equally important that other levers are brought to bear on better services for consumers, including Whitehall targets and initiatives, the regulatory landscape, local commissioning. Also that professional networks are ~~also~~ aligned to the goal of user-focused high-quality services.

Co-operative Development

Co-operative and mutual business models enjoy widespread political and public support. Recent research by Co-operatives UK has again shown the extent of this⁸.

- Public Awareness of co-operatives as a business model is over 75% and has increased recently – partly as a result of the high profile challenges faced by the Co-operative Group.
- Co-operatives have very positive associations; being seen as local (42%), ethical (46%) and

7 Time for a People's Ombudsman Service. Public Administration Committee. 2014

8 Barber, Birchall, Mayo (2014) Myners Plus. Co-operatives UK.

democratic (36%) and trusted (40%).

Politicians from across the political spectrum have expressed a desire to see the sector grow in order to contribute to economic recovery and job creation. In addition there is the potential for them to play a greater role in the provision of public services.

However, as the Welsh Co-operatives and Mutuals Commission⁹ recently noted there is work to do to *'create a culture and policy environment in which co-operative ways of doing business are the norm, not the exception.'*

The Commission set out a comprehensive set of recommendations which would help achieve the transformation of Wales' economy and communities. The Co-operative Party believes these can equally apply to other parts of the United Kingdom. They include the need for action in the following areas:

1. Education for Co-operation
2. Advice, support and development
3. Investment finance
4. Land and assets
5. Procurement
6. Intelligence and innovation
7. Networks and advocacy

Education for Co-operation

Despite the recent increase in the public awareness of co-operative business models there remains an urgent need to increase the level of knowledge about co-operative values and principles and the benefits of co-operative, mutual and employee owned models. This is true across the population – from teaching the history of the co-operative movement and its values to school children to raising the level of knowledge of specific business models amongst small business advisers, potential entrepreneurs and civil servants.

Co-operative Schools in England are demonstrating both through their curriculum and in practise through their governance how this can be done in communities. Proposals to ensure co-operative business models form part of the national curriculum, MBA programmes and young entrepreneurs schemes all merit consideration.

Advice, support and development

The Co-operative Party has heard time and again that too often the business and legal support available to those looking to set up new businesses focuses exclusively on traditional private sector models.

In Wales and Scotland the co-operative sector benefits from the work of the Wales Co-operative Centre and Co-operative Development Scotland. In England the Enterprise Hub has provided

⁹ Report of the Welsh Co-operatives and Mutuals Commission. 2014.

vital support for co-operative development. The Co-operative Party notes that the future funding of the Enterprise Hub is currently review and is concerned that the loss of this vital resource would be significant.

In England Local Enterprise Partnerships (LEPs) also play a key role in supporting local economic development and have the potential to provide important support to the mutual sector. However, currently there are concerns about their expertise in this area. For further information on Co-operative Party proposals to reform LEPs to ensure they are better able to take on this vital work see the Local Government and Communities Policy Paper.

The current government has been keen in particular to see an increase in the proportion of public services delivered by co-operatives and social enterprises in particular in health. Experience so far is that specialist support and advice is needed to enable this to happen. The Welsh Local Government Association told the Mutuels Commission¹⁰:

“All the evidence indicates that both communities and staff mutuals require a high degree of support in terms of ‘getting off the ground’ such as training and development in skills and knowledge, business support and one to one coaching and support.”

Programmes like ‘right to provide’ in England have sought to fill this gap but the programmes are time limited and legacy support will be required. The single most important factor for this to be successful is the wish of the majority of the staff to engage proactively in this type of enterprise. Cooperatives and Mutuels are not a soft option and to succeed they need a high degree of commitment and capacity building.

Investment finance

The availability of the necessary start up finance is a real challenge for many small business in whatever sector and regardless of business model. Since the financial crisis of 2008 the availability of SME lending has reduced and terms are more stringent. Due to a lack of understanding of business models co-ops and mutual can find it particularly tough to access the debt finance they need.

Providers such as Charity Bank, Co-operative and Community Finance and the Plunkett Foundation, as well as CDFIs (Community Development Finance Institutions) and some credit unions do attempt to fill this gap but more needs to be done to ensure that access to mainstream lending is available. The Co-operative Party welcomes the work of Big Society Capital and the Social Investment Business in this area but this is still embryonic.

An alternative to debt finance and grants is to raise equity finance through employee or community shares. This a growing area and in particular ‘crowd-funding’ is growing in profile and significance.

¹⁰ Pg 54

Labour's proposal of regional 'challenger' banks which would be more focused on providing financial services to SMEs in communities is positive – in particular if they work with existing CDFIs and others operating in this space. One of the keys to getting money flowing to new social enterprises and co-operatives would be the existence of a greater number of 'investment-ready' businesses for lenders to support. This is another reason why increasing the amount of expert business support is a key to unlocking significant development in the co-operative sector.

Withdrawable share capital

Co-operatives and mutuals received a boost as a result of a Treasury consultation during 2014. The most significant change came with the changes to the withdrawable share capital limits on co-operatives and mutuals. This type of share capital is unique to industrial and provident societies. It is of benefit to societies as it is free from some of the restrictions that apply to company shares. In particular there are no restrictions on the reduction of share capital, so the shares can be withdrawn and cancelled; this makes it ideal for membership organisations such as co-operatives.

In addition it has an exemption from the prospectus regulations which make it easier for societies to raise finance from their members without incurring expensive legal fees, although they should always follow good practice. Members investing in their co-operative are following a recognised and valued co-operative principle. The limit of this type of investment was £20,000 per individual member the Treasury have now moved this to £100,000 per individual member. It should be noted that the Co-operative Party's last manifesto called for this limit to be withdrawn altogether, however this change is certainly a welcome one for our movement.

Co-operative Consolidation bill

Since the last Co-operative Party manifesto the co-operative movement has benefited from the passing of the Co-operative Consolidation Bill. This Bill brought together a range of existing legislation concerning co-operatives and mutuals. The Co-operative Party is proud of its role in getting the original legislation into the statute but we are aware that the law being diffuse led to a lack of clarity for those developing co-operatives therefore the consolidation exercise is very helpful to the movement.

Land and Assets

Local Government can and should do much more to deliver power and ownership of local services to the communities that depend on them. We believe that community-based and new mutual organisations have a vital role to play in running local services, tackling crime and anti-social behaviour, supporting families, engaging young people and regenerating rundown neighbourhoods.

Communities can take on redundant land and buildings, and transform them from potential liabilities into income generating assets for social good. Asset acquisition could create a foundation for a self-help enterprising approach that will enhance resilience in our communities and create the foundations of a much strengthened community enterprise sector as we come out of the recession.

In England such transfers have been made possible via the 'Community Right to Bid' and in Scotland via the 'Community Right to Buy' legislation. However, it is still a real challenge for communities

to mobilise quickly enough when a local service is under threat and the current rules mean that communities will find a wide range of barriers, including legislative, planning and financial barriers, when wanting to save vital services. The Co-operative Party believes that there is a need to change the balance of power so that communities have the 'right to try' to put together a community run model which can keep services open.

It is vital that any assets transferred by local authorities remain in public control, and accountable to the community they serve. It is therefore suggested that community benefit societies would provide the best legal structure to enable such a transfer as:

- They are democratically accountable to a widely defined and open membership, thus ensuring that community-based organisations act in the public interest.
- They have an 'asset lock' which can guard against dissolution and ensure that resources can only be transferred to other organisations with a similar commitment to serving the community.

For further information about the Co-operative Party's policy ideas on this issues see the Local Government and Communities Policy Paper.

The greater use of Community Land Trusts has significant potential to support the development of more co-operative housing whilst retaining assets for community benefit. In particular this offers the potential to help overcome local objections to housing development; as can the knowledge the houses built will remain affordable in perpetuity.

For further information about the Co-operative Party's policy ideas on this issues see the Housing Policy Paper.

Procurement

The opening up of public sector procurement and the commissioning out of more public services presents a significant opportunity for co-operative and mutual development. In England co-ops, mutual and other forms of social enterprise are already significant providers of public services in some sectors including health and social care.

However, they continue to face real barriers and an uneven playing field. The Co-operative Party welcomes the Public Services (Social Value) Act 2012 in England which recognises that, how and with whom, public authorities contract can have a profound effect on the manner in which services are provided and the value gained from them. However, it is relatively limited in scope, relating as it does to the 'pre-procurement' stage and cannot be used during the consideration of the final contract award. It also only applies to contracts for services not for goods or works.

When contracts to provide services are put out to tender, local authorities should have processes that ensure that co-operatives and mutuals are able and encouraged to bid. Wherever permitted, the long-term value and local impact of a contractor's offer should be taken into account in the bidding process, including its track record and inherent expertise, its customer satisfaction or its likely social and environmental impact and contribution towards local economic development.

For too long procurement rules have put co-operatives and social enterprises at a disadvantage. This needs to change. That is why Labour & Co-operative MSP James Kelly sought to amend the

Procurement (Scotland) Reform Bill to enshrine a requirement on all public bodies procuring public services to assess how they are developing and supporting co-operative and mutual providers through the procurement process. The public sector in Scotland spends around £10 Billion on areas covered by the Procurement Reform Bill. We believe it would send out a powerful signal if this public expenditure also delivered social goods like the Living Wage, Fairtrade and more support for the co-operative sector. It is disappointing that the Scottish Government did not accept our amendments therefore a future Labour & Co-operative Government Scotland will be needed to make these vital changes.

The Co-operative Party welcomes new EU procurement rules which will – if properly implemented by the UK government – acknowledge the benefits of co-operative and social enterprise procurement of local services and create a vital rebalancing in England and Wales. However, the Co-operative Party believes that these regulations must include strong and clear guidance on the types of co-operative, mutual and social enterprise models covered to ensure they deliver the social value intended.

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