

# Strategy Statement of the CCPC

2015 - 2018



Coimisiún um  
Iomáíocht agus  
Cosaint Tomhaltóirí

**Competition and  
Consumer Protection  
Commission**

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# 1. Foreword

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The Competition and Consumer Protection Commission (“the Commission”) was established on 31 October 2014 following commencement of the Competition and Consumer Protection Act 2014. The Commission is an independent body with a broad statutory remit assuming the statutory responsibilities previously held by the Competition Authority and National Consumer Agency. The Commission’s stated mission is “to make markets work better for consumers and businesses”.

The rationale for a State body having responsibility for both competition and consumer protection functions rests on the idea that it is more effective and efficient for a single, independent organisation to examine market issues, whether those issues relate to a lack of competition, a failure to comply with competition law, consumer protection concerns, or a combination of these factors.

The Commission is required to produce a new Strategy Statement as soon as practicable after the commencement of the new legislation. This Strategy Statement will guide the Commission over the next three years as we continue to build a new organisation. It will help us focus our resources on areas where we can have the greatest impact and where we can deliver the best outcomes for consumers, businesses and the economy as a whole.

As the Irish economy continues to recover and grow, the Commission will play its part in improving Ireland’s economic future by ensuring that all sectors of the economy can make a significant contribution to growth by being open and competitive. Competitive markets where consumers can exercise choice are a key driver of productivity, innovation and long-term growth. Competition between firms, complemented by appropriate consumer protection and empowerment, is the best means of creating and fostering markets where consumers are treated fairly and can access quality goods and services at reasonable prices. In contrast, inefficiency and poor quality whether through

a lack of competition or an overly protective approach to the position of incumbents is a cost borne by all sectors of the economy, including individuals, business and the State.

In the course of developing this Strategy Statement the Commission consulted with a wide range of external and internal stakeholders, received written submissions from business and consumer representative groups, and conducted meetings with Government Departments, sectoral regulators, legal practitioners and academics. This process allowed us to gather and analyse a wide range of opinions on how we should fulfil our statutory mandate and we would like to thank all those who participated in the consultation process. Among other things, our stakeholders expressed a strong desire to see the Commission set clear goals and priorities and to communicate these in an open and transparent manner.

The Commission is an independent organisation and will make its decisions based on the best evidence available. This independent objectivity is crucial to our credibility. While we will plot our own course of action and make independent decisions, this Strategy Statement is a better roadmap thanks to the richness of the views we have received from both external and internal stakeholders.



## 2. Mission, Vision and Values

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As part of the process of bringing the Competition Authority and the National Consumer Agency together as a new organisation, the Commission undertook a Mission, Vision and Values exercise involving all of our staff in order to build a shared sense of purpose. The exercise involved all staff of both organisations meeting together on a number of occasions to formulate the Commission's Mission, Vision and Values through an open and inclusive process. This led to the formulation of our Mission, Vision and Values in a way that represented the consensus views of our staff and has resulted in a high degree of commitment to them throughout the Commission.

Our mission statement sets out what we want to achieve.

**Our mission is to make markets work better for consumers and businesses**

Our vision sets out how we intend to fulfil our mission by describing what we need to accomplish.

**Our vision is for open and competitive markets where consumers are protected and empowered and businesses actively compete**

Our values translate our vision into the actions and decisions we make every day. They set the standards we expect of each other in our work and in our engagement with stakeholders.

### **Our Values**

#### **1. Effectiveness**

- We prioritise work that will have the most impact
- We produce visible and practical solutions that make a difference
- We collaborate to get the best results

#### **2. Efficiency**

- We are cost-effective in our use of resources
- We are flexible and creative in how we work
- We empower our people to get results

#### **3. Impartiality**

- We analyse issues impartially, examining information and evidence objectively
- We make decisions independently in the public interest
- We are open and consultative and base our views on the best available evidence

#### **4. Excellence**

- We approach our work with expertise, rigour and professionalism
- We objectively analyse our work to achieve continuous improvement
- We are a learning organisation and continuously increase our knowledge and improve our skills

#### **5. Respect**

- We listen to and consider the opinions of others
- We value the roles and contributions of all our colleagues
- We communicate clearly and consider the impact of how we communicate

## 3. Mandate and functions

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### **Our Mandate**

The Commission has a broad mandate, with statutory responsibility for the enforcement of competition and consumer protection law. As well as our enforcement responsibilities and our role in assessing the impact of mergers on competition, we have a mandate to promote consumer and economic welfare. We do this in many different ways. These include conducting research, undertaking studies, publishing papers and making submissions which inform and influence government policy relating to consumer and competition issues. We publish guidance documents to inform and assist interested parties in understanding the scope and content of competition and consumer protection laws. We also operate a consumer helpline and website [www.consumerhelp.ie](http://www.consumerhelp.ie) which informs consumers of their rights, and we advocate on behalf of consumers. Ultimately, our aim is to ensure that markets are competitive and play a role in making Ireland a better place to do business and to be a consumer.

We also have specific responsibilities in relation to the safety of consumer products, personal finance education and information, and the regulation of grocery sector business relationships, the latter being a new regulatory function created by the Competition and Consumer Protection Act 2014.

### **Our structure**

The amalgamation of the Competition Authority and the National Consumer Agency provided an opportunity to develop a fully integrated structure. The leadership of both legacy organisations was convinced that the full benefits and efficiencies of the amalgamation would only be realised if an inclusive, holistic approach to devising a structure for the new organisation was taken. This was done by clearly identifying the various different functions of the Commission (including new functions created by the 2014 Act) and designing a structure that would enable the new organisation to deliver effective outcomes in the most efficient way possible. The process adopted was similar to that used to agree our Mission, Vision and Values. The Members-designate of the

Commission and the senior staff of the Competition Authority and the National Consumer Agency, after considerable deliberation, came up with a proposed structure that would create a cohesive, integrated new body that would give full effect to the Commission’s statutory functions. All staff were consulted on the draft structure which this group had devised, before it was finalised by the Commission on its establishment on 31 October 2014. We believe that the new structure is working well and is already contributing significantly to the integration of the Commission’s competition and consumer protection functions. All staff are committed to implementing the combined mandate of the Commission and will work closely with colleagues – contributing to cross-divisional projects and work streams as needed.

Figure 1. Competition and Consumer Protection Commission Structure Chart. The structure chart is available on our website [ccpc.ie](http://ccpc.ie) and will be updated in the event of any structural changes.



The organisation structure is one that aims to achieve the maximum in terms of efficiency and integration. It utilises the skills of the organisation’s staff, who come from diverse and complementary backgrounds and have a wide range of professional and technical expertise and experience.

The Competition and Consumer Protection Commission is governed by an Executive Chairperson and Commission structure. The Competition and Consumer Protection Act



allows for a chairperson and between two and six members of the Commission.

Isolde Goggin is Chairperson of the Competition and Consumer Protection Commission. In addition to the Chairperson, there are currently four Members of the Commission; Stephen Calkins, Gerald FitzGerald, Patrick Kenny and Karen O'Leary. Each Member of the Commission oversees a portfolio of Divisions on behalf of the Commission. The Executive Office reports directly to the Chairperson.

## **Our Functions**

The Commission carries out its statutory obligations by performing the following functions:

- Investigating and challenging practices that are damaging to consumers and/or the wider economy
- Bringing anti-competitive behaviour and practices that are harmful to consumers to an end, where necessary by court actions
- Providing information to consumers to help them make informed decisions. We have a specific role in this regard relating to financial services
- Examining certain mergers and acquisitions to ensure that they do not result in a substantial lessening of competition in Ireland
- Advising policymakers in relation to consumer protection and competition matters
- Responsibility for market surveillance in relation to the safety of products covered by relevant EU Directives. We have responsibility for monitoring and processing non-food product recalls in Ireland
- Promoting and enforcing compliance with new regulations concerning defined aspects of the commercial relationships between suppliers, wholesalers and retailers in the grocery sector

Our decisions and policy positions are underpinned by the analysis of evidence gathered through primary and secondary research, contacts to our consumer helpline, and international good practice.

Competition and consumer legislation gives the Commission a wide remit that it implements through the following activities:

### **Enforcing Competition Law**

The Commission is responsible for enforcing Irish and European competition law in Ireland. We do this by undertaking both criminal and civil investigations. Where we believe that a criminal prosecution is warranted – as there is evidence of cartel activity - a file is sent to the Director of Public Prosecutions who decides whether to initiate a prosecution on indictment. In cases where we find evidence of other forms of anti-competitive conduct, the Commission itself initiates civil enforcement proceedings in the courts with a view to obtaining a declaration of illegality and/or injunctive relief.

The most serious breaches of competition law are cartels – where businesses offering the same products or service agree not to compete with one another or to fix prices. Cartels constitute hardcore criminal offences because they are recognised as causing the most serious harm to competition and consumers, for which no economic or other justification can be made. The Commission has a particular interest in detecting and deterring bid-rigging cartels which can impact negatively on any procurement process, including those run by the State and its agencies.

Other infringements of competition law include the abuse by dominant firms of their market power and agreements that restrict competition, but do not fall within the definition of the cartel. It is our role to investigate suspected anti-competitive conduct and where it is found to exist, we will use our statutory powers to bring it to an end, where necessary, seeking appropriate sanctions through the courts.

## **Enforcing Consumer Protection Law**

The Commission is responsible for enforcing a wide range of consumer protection legislation, mainly arising from EU Directives which were designed to protect consumers at all stages of a transaction. Consumer law applies when a consumer (acting in a private capacity) buys goods or services from a business. For example, the Consumer Rights Directive has introduced information obligations on traders and withdrawal rights for consumers. Measures to address unfair or misleading commercial practices are addressed through the Unfair Commercial Practices Directive - given effect in Ireland by the Consumer Protection Act 2007 - while control over the contract terms upon which a consumer may be required to contract is provided by the Unfair Terms in Consumer Contracts Directive. These examples cover all transactions between a business and a consumer across the economy and demonstrate the Commission's very broad consumer protection mandate. In order to address breaches of these provisions, the Commission can select from a range of enforcement tools to tackle unacceptable practices that mislead, are unfair or harm consumers in other ways. These interventions can range from civil remedies to criminal prosecutions. The Commission also has statutory responsibility for the regulation of pawnbrokers and credit intermediaries (for example garages that offer to arrange finance on new or used cars).

## **Assessing Mergers**

Proposed mergers, acquisitions and takeovers of firms which meet certain turnover thresholds are required to be notified to the Commission in advance of their implementation. The Commission assesses whether they are likely to result in a substantial lessening of competition (SLC) in the affected markets. Where it finds that no SLC is likely to result, it approves the transaction. But where it finds that a transaction is likely to result in SLC, it will either prohibit the completion of the transaction or impose conditions (such as divestment of certain assets) which are designed to eliminate the risk of SLC occurring.

## **Enforcing Product Safety Regulations**

Unsafe products should not be placed on the market. The Commission's role is to ensure that product safety standards are being complied with through the General Product Safety Directive and other related sector-specific regulations, e.g. the Toy Safety Directive and the Low Voltage Directive. Information about dangerous goods and enforcement measures must also be shared across the EU. This is achieved through the 'RAPEX' procedure. The Commission is the point of contact for RAPEX, the European rapid alert system for product safety and rapid intervention. Approximately 2,500 RAPEX alerts are received per year, all of which must be followed up and appropriate action taken to protect consumers if an unsafe product is available on the Irish market.

## **Grocery Sector Regulations**

This is a new function given to the Commission - to promote and enforce compliance with the new Grocery Goods Regulations governing aspects of commercial relationships in the grocery sector. Compliance will be promoted through the effective and balanced use of the range of powers available to the Commission. This will involve "risk-impact" based enforcement activity, establishing appropriate relationships with grocery goods undertakings and developing practical and legally sound procedures and guidance.

## **Informing Consumers about their Rights**

The Commission has an extensive role in helping consumers to make informed decisions and assert their rights. In order to do this, consumers must be aware of their rights and choices, and the implications of the choices they make. We inform consumers of their rights by ensuring that all our information across all our communications channels (on-line and phone) is up to date and accurate. We also develop public awareness campaigns and participate in all forms of media to communicate our message.

## **Advising Government and Influencing Policy**

The Commission has the function of advising the Government, its Agencies and public bodies on how proposed legislation or regulations could affect markets in terms of competition and/or consumer welfare. In this way, we give a voice to competition and consumer welfare in the policymaking process. The Advocacy and Market Intelligence Division analyses markets in terms of the consumer experience across the economy and provides information to the Commission to assist it in setting priorities. The Commission also has a function to promote competition and consumer interests in the economy including to business and other key stakeholders.

## **Encouraging Business Compliance**

We foster a culture of compliance throughout the economy by helping business to take active steps to comply with the law. Where we wish to change the behaviour within an industry we may decide to advocate to a trader directly or via a regulatory or representative body.

## **Personal Finance Information and Education**

The Commission has a specific obligation under its legislation to provide personal finance information and education. This is funded by way of a levy on regulated financial services providers. Under Section 21 of the Central Bank Reform Act, 2010, this means that levy funds, including pay expenditure, cannot be allocated to the Commission's work outside these functions.

The actions under this remit include the provision of information via our consumer websites, working on financial education programmes for schools, in the workplace and in collaboration with voluntary groups and NGOs.

## 4. Operating environment

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The Commission has a diverse range of statutory functions to perform and the manner in which we employ our resources needs to anticipate and respond to changes in the environment in which we operate. These changes can be the result of economic and technological developments, changes in the behaviour of consumers or traders, or new rules and regulations from Irish and EU institutions. We have processes in place to monitor our operating environment and to ensure that we respond to changes in a timely manner.

### **Policy Environment**

Policymakers are frequently under pressure from groups seeking to influence the legislative process in their favour. For example, some sectors responded to the recession by lobbying Government to introduce measures granting them specific exemptions from competition law. Such exemptions remove the need for the businesses to which they apply to observe the normal rules of competitive markets. Where such exemptions existed in the past, the harm to consumers was both long-term and difficult to reverse.

The pressure on policymakers for protection from competition law has not abated even as the economy shows signs of recovery. It is important that Government policy continues to support effective competition so that consumers are not harmed either now or in the future, by ensuring that markets are competitive and efficient. The application of competition and consumer protection law to all sectors of the economy will help Ireland improve its international competitiveness, sustain its recovery and enhance future growth and employment prospects. The Commission has and will continue to urge Government to resist calls for exemptions from competition law from special interest groups.

## Legal Environment

In order to achieve an economy where consumers can avail of a wide selection of quality goods and services at reasonable prices, it is necessary to have a legal environment which supports this objective. Both competition and consumer protection law are the primary instruments in this process. They provide the Commission with a range of investigative powers and enforcement tools it can use to raise awareness and to deter the types of conduct which cause the most harm to the economy, to competition and to consumers.

Competition law enables the Commission to gather evidence through the use of formal requests for information, witness summons procedures and searches (or “dawn raids”) at the premises of firms under investigation. However, unlike in many other EU Member States, the Commission itself cannot make a finding of infringement, issue a cease and desist order or impose sanctions on infringing undertakings; the decision to do any of these things is reserved to the Irish courts. Even the courts have a more limited range of sanctions than can be imposed in most other EU Member States. While hardcore cartel activity exposes those involved to the risk of criminal prosecution and to the sanctions that courts can impose on conviction<sup>1</sup>, other forms of anticompetitive conduct do not involve that risk or the risk of non-criminal financial sanctions being imposed by the courts.

The Commission is also responsible for the investigation of breaches of European competition law in Ireland. This obligation comes principally from Council Regulation (EC) 1/ 2003. Regulation 1/2003 empowers National Competition Authorities (“NCAs”) and national courts to apply Articles 101 and 102 of the Treaty on the Functioning of the European Union (“TFEU”) in a harmonised manner. The Regulation also empowers NCAs to impose fines and other penalties. The European Commission has recently published a Communication to mark 10 years of Regulation 1/2003 in which it states that it will further assess appropriate initiatives to: “ensure that powers to impose effective and

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<sup>1</sup> i.e., fines of up to 10% of turnover and imprisonment for terms of up to 10 years

proportionate fines and well-designed leniency programmes are in place in all Member State and consider measures to avoid disincentives for corporate leniency applicants”<sup>2</sup>.

In its 2013 Policy Statement on Sectoral Economic Regulation, the Government noted that Constitutional provisions around the administration of justice in Ireland created problems around the transposition of European law, and asked the Law Reform Commission to examine the potential for Ireland to introduce a system of administrative sanctions<sup>3</sup>. The introduction of such a regime would enhance our ability to pursue non-hardcore breaches of competition and could act as a strong deterrent in preventing such breaches in the first instance.

The Commission works closely with the European Commission and with the national competition authorities of other Member States with a view to achieving a coordinated and consistent approach to the interpretation and enforcement of EU competition law. This happens on an ongoing and frequent basis through the European Competition Network that was set up under Regulation 1/2003.

## **Technology and Innovation**

One of the key challenges for the Commission is to keep abreast of developments in markets. New channels and new products and services as well as new business models can be good but could also pose difficulties for consumers. We will continue to analyse data that comes directly to us from consumers through our consumer helpline and social media channels. We will actively seek information through research and from domestic sources and other jurisdictions about emerging trends in markets affecting consumers.

## **Public Sector Reform**

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<sup>2</sup> Communication from the Commission to the European Parliament and the Council, Ten Years of Antitrust Enforcement under Regulation 1/2003: Achievements and Future Perspectives.

[http://ec.europa.eu/competition/antitrust/legislation/antitrust\\_enforcement\\_10\\_years\\_en.pdf](http://ec.europa.eu/competition/antitrust/legislation/antitrust_enforcement_10_years_en.pdf)

<sup>3</sup> Regulating for a Better Future July 2013 Economic Regulation A Government Policy Statement on Sectoral Economic Regulation

[http://www.taoiseach.gov.ie/eng/Publications/Publications\\_2013/Policy\\_Statement\\_on\\_Economic\\_Regulation\\_2013.pdf](http://www.taoiseach.gov.ie/eng/Publications/Publications_2013/Policy_Statement_on_Economic_Regulation_2013.pdf)



The establishment of the Commission is part of wider set of public sector reforms set out in the Government's Public Service Reform Plan<sup>4</sup>. This plan challenges all public bodies to reduce costs, improve productivity and to deliver services in more creative ways.

In an environment of significantly reduced budgets and staff numbers, coupled with increased demands, we have learned to do more with less. As a public body in receipt of exchequer funding, the Commission ensures that it is effective in all aspects of its work and that it provides value for taxpayers' money. This is one of our core values. The Commission will focus on developing and improving effective and efficient work practices and is committed to the best use of information technology to enable knowledge sharing and information management.

The Government's reform agenda also provides an opportunity for the Commission to make a valuable and positive contribution to the Irish economy. The compatibility between competition and the provision of public service raises a number of policy questions that need to be addressed. In particular, key issues include how to define and measure the cost of public service provision and who should provide it. For example, we are currently preparing a study on Competitive Neutrality which covers the concept that there should be a level playing field for all entities (whether State-owned or private) involved in the same economic activities.

It is important for policymakers to appreciate that for Government interventions in markets to be effective in the long term, their impact on competition needs to be a central consideration from the outset. Failure to address the indirect costs and possible spillovers can result in a less effective policy and impose unnecessary costs on consumers and/or taxpayers.

## **Setting Priorities for Enforcement**

The Commission is critically aware of the need to prioritise its activities to ensure the best outcome for consumers and businesses and to provide value for money. This means that in choosing to pursue one course of action or case, another may be dropped or delayed. The Commission will base its interventions on evidence gathered from a

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<sup>4</sup>Public Service Reform Plan 2014-2016 <http://reformplan.per.gov.ie/>

number of sources. For example, the insights revealed in our Consumer Detriment Study together with the intelligence we gain from consumers who contact our helpline and from our other sources of information give us an economy-wide understanding of the problems faced by consumers in Ireland and an evidence base for future prioritisation<sup>5</sup>.

The Commission therefore will set priorities to guide it in its enforcement activities. The prioritisation principles will help strike a balance within our “portfolio” of enforcement activity so that we can pursue an appropriate combination of criminal and civil enforcement, as well as taking proactive steps to deter illegal behaviour and promote compliance with the relevant statutory provisions.

## **Critical Success Factors**

There are a number of critical success factors in our operating environment which may affect our work during the period of this Strategy Statement. While these factors are to a significant extent outside our control, it remains up to us to deal with the risks and opportunities they present. The main critical success factors relate to staff and budgeting, the political and policy environment and the legal system.

## **Managing the Amalgamation Process**

The amalgamation of the Competition Authority and the National Consumer Agency required the commitment of substantial resources to a programme of projects to ensure that the Competition and Consumer Protection Commission would be operational on 31 October 2014 and would function effectively thereafter. That this has happened is a testament to the planning and commitment of the Commission’s staff. The amalgamation process is ongoing as we invest in the development of new IT systems and support services for the enlarged organisation while equipping and supporting our staff as they adjust to their roles within the new structure.

## **Staff Retention**

Our staff are our most important asset and our wide legislative remit requires our staff to have a diverse range of specialised skills. Recent improvements in the economy have meant a corresponding increase in the marketability of these skills and at the time of

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<sup>5</sup> <http://www.consumerhelp.ie/index.jsp?p=100&n=101&a=1268>

writing this Strategy Statement, we are experiencing an increase in staff turnover. In addition, the moratorium on public sector recruitment which has been in place for the past number of years has left us with a number of vacancies and slower internal career progression opportunities for existing staff.

The freedom to recruit and retain staff in the current environment will be essential for us to deliver on the strategy set out in this Statement. As of April 2015, the Commission is awaiting sanction to fill more than 20 vacancies which exist in key operational areas across the combined organisation. In addition, we have sought sanction for a number of new posts that are essential in order for us to fulfil our new statutory functions in the areas of groceries regulation. The sanction to fill these vacancies and the additional posts required for new functions is an urgent and critical factor in determining the Commission's ability to perform its statutory functions to an acceptable standard.

The Commission is committed to getting the best from its current resources through developing and motivating staff and setting challenging but achievable performance targets.

### **A single location**

We are currently located in two separate buildings and this – for a relatively small organisation – leads to inefficiencies and unnecessary communications difficulties.

We are working with the OPW to source suitable accommodation for the Commission and expect that the relocation will happen within the life-time of this Strategy Statement. The full benefits of amalgamation cannot be realised until our staff are able to work together in one location.

### **Raising our profile**

The launch of a new organisation with a new name and brand is an opportunity for us to communicate our mandate and functions more widely and we aim to take full advantage of this opportunity. Our new communications strategy will allow us to tailor our messages to key audiences and this will guide us in how we present information in a way that is tailored, relevant and clear.

The key themes for our communications strategy as we continue to establish are;

- Building stakeholder awareness of our role and functions
- Helping consumers make informed decisions
- Promoting the benefits of competition and consumer protection
- Promoting compliance amongst business



## 5. Strategic Goals

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In order for us to fulfil our mission of making markets work better for consumers and businesses, we have set four strategic goals which we are committed to over the lifetime of this Strategy Statement.

**Strategic Goal 1. We will use our enforcement and regulatory powers to make markets work better and get the best results for consumers**

**Strategic Goal 2. We will promote the benefits of competition and consumer protection through our advocacy and public awareness activities**

**Strategic Goal 3. We will empower and equip consumers to make informed choices and assert their rights**

**Strategic Goal 4. We will continue to develop as a results-driven organisation that aspires to the highest standards in everything we do**

## **Strategic Goal 1. We will use our enforcement and regulatory powers to make markets work better and get the best results for consumers**

We have a wide range of enforcement and regulatory powers from various enactments and regulations. These include Competition Law, Consumer Law, Product Safety Law and regulatory functions in the area of Grocery Goods. Enforcement is a core activity for the Commission and we are committed to using our powers effectively. Our enforcement tools range from prosecutions on indictment (in the case of hard core criminal breaches of competition law) to summary prosecutions, prohibition orders, contravention and compliance notices for some offences and fixed payment notices for lower level breaches of certain enactments. We can also use undertakings or commitments as enforcement tools to change behaviour where appropriate. While we will not hesitate to enforce the law when necessary, we will encourage businesses to take a proactive approach to compliance.

### **High Level Actions**

- We will use our powers in a way that is proportionate to the harm caused and based on the attitude of the trader to putting things right
- We will examine each case on its merits and our prioritisation principles will guide us in our course of action
- Our enforcement activity will focus on impact and good outcomes across all our functions equally
- We will carry out our merger review function efficiently, effectively, and according to best international practice
- We will apply best practice to ensure efficient and effective case handling procedures
- We will promote compliance through information, guidance and engagement, where appropriate

## Key Performance Indicators

- Enforcement actions taken / outcomes achieved
- External activities – searches, inspections
- Investigations opened and concluded
- Adherence to best practice in case management
- Applying international best practice in merger assessment
- Regulatory applications/returns processed

## **Strategic Goal 2. We will promote the benefits of competition and consumer protection through our advocacy and public awareness activities**

Our advocacy role is about representing consumers' interests in the public policy debate. This involves persuading Government, its agencies and public bodies about the merits of competition and consumer protection for the economy as a whole. It also involves persuading the private sector that competition offers opportunities for efficient, innovative businesses to thrive. The consumer voice can be drowned out in the public debate when public bodies come under pressure from well-organised lobbying efforts to protect certain vested interests. The Commission is well placed to step in to these debates and redress the balance by being an independent and consistent advocate for competition and consumer protection.

### **High Level Actions**

- We will focus our advocacy resources on sectors and issues which have the most impact on the daily lives of consumers
- We will use our unique position as an organisation that has a broad perspective on markets to identify problems that occur across different markets and sectors
- We will develop and promote policy positions and advocacy interventions based on evidence and robust analysis, and we will be an independent voice in public debate on important issues within our remit
- Where appropriate we will seek voluntary co-operation from business / sectors to adopt a positive approach to compliance, based on our view that what is good for consumers and good for competition is also good for business
- We will work with other public bodies, sectoral regulators and business / trade associations to identify and solve problems in the most effective way

### **Key Performance Indicators**

- Qualitative research projects including survey perceptions of competition and our organisation



- Formal consultation responses and recommendations published
- Working group participation
- Stakeholder representations
- Ministerial studies as requested
- Quantitative market research projects
- Public statements on policy issues
- Advocacy for competition and consumer rights

### **Strategic Goal 3. We will empower and equip consumers to make informed choices and assert their rights**

In order for markets to work well consumers must be able to exercise choice and assert their rights. This provides firms with the incentive to offer better value and to innovate to compete and win custom. Empowered consumers are more likely to search for value, take action when things go wrong and manage their finances effectively.

#### **High Level Actions**

- We will provide consumers with independent, relevant and accurate information through our website [consumerhelp.ie](http://consumerhelp.ie) and helpline in order to help them make informed decisions
- We will help consumers decide on their course of action when they have a problem with a trader through information on their rights and how to complain
- We will provide personal finance information and education to assist consumers with the management of their money
- We will conduct public awareness campaigns on significant issues of consumer rights and personal finance

- We will work with other agencies, regulators and businesses to ensure that there are no gaps in the provision of information that consumers need

### **Key Performance Indicators**

- Website visits and visitor engagement
- Public awareness initiatives
- Helpline consumer contacts
- Number of newsletter subscribers
- Organisations/groups reached with financial education programmes

### **Strategic Goal 4. We will continue to develop as a results-driven organisation that aspires to the highest standards in everything we do**

The creation of the Competition and Consumer Protection Commission presents a unique opportunity to form a new, independent and authoritative body with the knowledge and expertise to achieve the best outcomes for the economy, the State, businesses and consumers. As an organisation mainly funded by public resources, the Commission must operate as effectively as possible and demonstrate that we provide value for tax payers' money by delivering tangible results.

### **High Level Actions**

- We will make the best use of our extensive in-house expertise, through a culture of collaboration, constructive challenge and continuous improvement
- We will utilise good practice in terms of managing performance in order to get the best from our people and develop their potential
- We will invest in training and foster a learning and results-driven culture that values expertise, coupled with effective delivery

- We will develop systems that ensure good practice in knowledge management and project management
- We will maximise our resources through cross-functional project opportunities, internal mobility and cross-organisational learning
- We will comply with all applicable corporate governance standards
- We will develop policies to ensure we can attract and retain the right staff and empower them to deliver on their jobs

### **Key Performance Indicators**

- Successful cross-functional projects
- Continuous improvement programmes delivered
- Effective internal communication structures
- Audit reports actioned and business risks actively managed
- Effective training and development programmes implemented
- Performance management applied actively and fairly
- Effective procurement, cost savings and value for money initiatives
- Data protection, ethics in public office, financial procedures



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Iomaíocht agus  
Cosaint Tomhaltóirí

**Competition and  
Consumer Protection  
Commission**