

2021 - 2023

STRATEGY



INTRODUCTION

When the CCPC published its last Strategy Statement in early 2018, we could never have foreseen the circumstances in which we would be drawing up its successor. At that point, we anticipated that Brexit would have a significant impact on our work, although we did not know the exact shape that it would take. We were aware of major European legislative developments coming down the tracks in competition, consumer and product safety law, which would give us greater powers and responsibilities. And we knew that the consumer experience was changing rapidly, as online markets created an almost infinite array of options, and yet made choosing the right one difficult and complicated.

Three years on, the CCPC still faces those challenges. At the time of writing, the final form of Brexit is still unclear, although the possibilities have narrowed in a way which is likely to disadvantage consumers. The legislative landscape is starting to solidify, however, there are still some important decisions to be taken. Competition and consumer protection authorities worldwide have improved their understanding of digital markets and are considering potential tools for dealing with ways in which these markets can cause consumer detriment. The consequences of Brexit, and particularly the UK becoming a third country will be one of the biggest changes, and the biggest challenge for us – one which is likely to permeate in some form throughout the term of this strategy.

In recent months, the CCPC has moved quickly to respond to the immediate issues arising from the COVID-19 pandemic. The process of devising this Strategy Statement has enabled us to think about the longer term impacts, particularly the rapid acceleration of the shift away from bricks-and-mortar retailing towards online purchasing – a phenomenon which now affects all ages and most types of product and service.

Given the uncertain external environment, developing a Strategy Statement which will still be valid and relevant in three years' time is obviously enormously challenging. We recognise the need to be flexible and agile, in order to react rapidly to problems and issues as they develop, while at the same time building on the solid track record we have established in enforcement, consumer protection, product safety and business compliance. Despite the necessary restrictions and limitations of working remotely, we are grateful to the people and organisations who gave their input and insights which have helped to inform our strategic direction over the next few years. I would like to express a particular thanks to the Department of Enterprise, Trade and Employment for its valued contributions and support during the lifetime of our previous strategy. We will continue to engage and build relationships with our many stakeholders at home and internationally to make markets work better for consumers.

Finally, I would like to recognise and thank the staff of the CCPC, our people, who have continued to demonstrate an unwavering commitment to their work and delivering outcomes in the best interests of consumers and businesses. And for their enthusiasm and valuable input in developing our next Strategy Statement, I look forward to working with all of my colleagues in delivering on the opportunities and challenges that lie ahead.



A handwritten signature in black ink, reading "Isolde Goggin".

Isolde Goggin, Chairperson



ABOUT THE CCPC

The CCPC is the statutory body responsible for promoting compliance with, and enforcing where necessary, competition and consumer protection law. We strive to improve consumer welfare across the economy by enforcing over 40 legislative instruments, including product safety legislation.

Our aim is to make markets work better for consumers. To achieve this we work to influence public debate and policy development, grow public understanding of the importance of open and competitive markets, promote competition and highlight the interests of consumers.

We provide information to consumers about their rights, personal finance and product safety, through a [consumer helpline](#), a dedicated section of our website [ccpc.ie](#), public awareness campaigns and through our various [financial education initiatives](#).

We have statutory roles in relation to Alternative Dispute Resolution, credit intermediaries and the regulation of business relationships in the grocery sector.



The CCPC is governed by an Executive Chairperson and Commission structure. Each Member oversees a number of Divisions in the CCPC on behalf of the Commission.



Isolde Goggin
Chairperson



Patrick Kenny

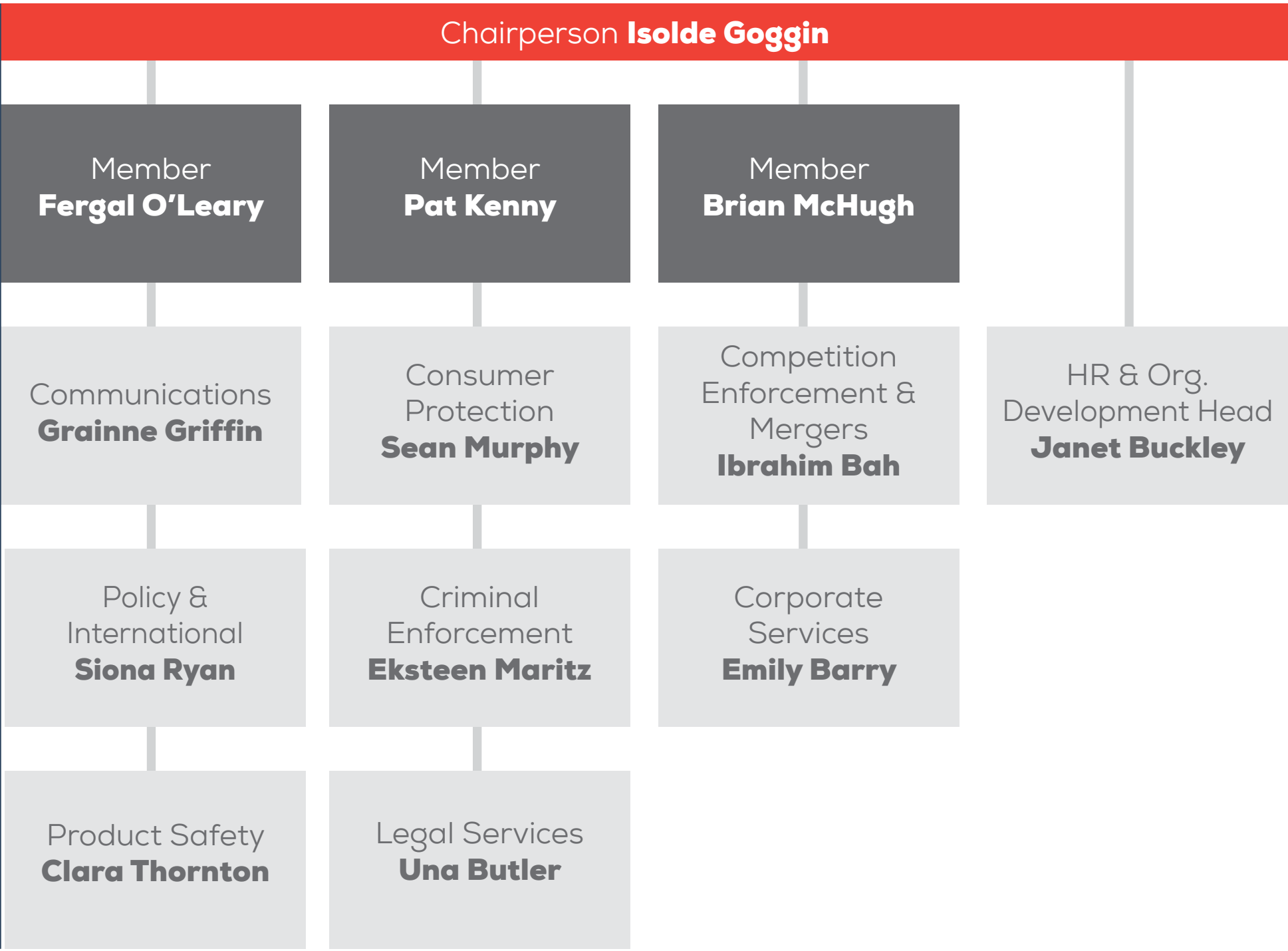


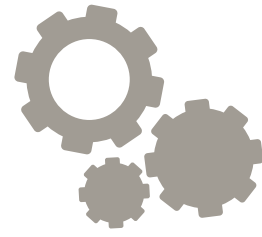
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**OUR
STRUCTURE
2020**




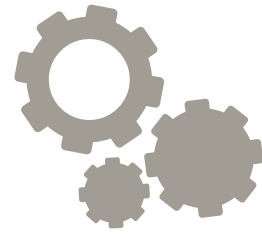





STRATEGY 2018 - 2020

The ambition of the CCPC's Strategy Statement 2018-2020 was to deliver tangible and impactful work that benefited consumers and businesses. We sought to achieve effective enforcement outcomes, drive business compliance, proactively and quickly address competition and consumer protection concerns and increase awareness of our consumer information services. We also aimed to empower and develop our people to maximise our impact.

Over the course of the last three years the CCPC has delivered a number of **important outcomes for consumers and competition including:**

<p>1</p>  <p>DETECTION OF BID-RIGGING:</p> <p>Referring a file to the Director of Public Prosecutions into potential bid-rigging in the procurement of publicly-funded transport services.</p>	<p>2</p> <p>LONG TERM RESIDENTIAL CARE SERVICES FOR THE ELDERLY:</p> <p>Conducting an in-depth examination of contracts of care in long term residential care services for the elderly which resulted in important guidelines for service providers and residents/their families.</p> 	<p>3</p>  <p>ENFORCEMENT POWERS:</p> <p>Advocating strongly for administrative sanctions and a leniency programme to address gaps in the competition law regime.</p>	<p>4</p> <p>PCP CAR FINANCE:</p> <p>Publishing the first public analysis of the Personal Contract Plan (PCP) finance market in Ireland, which identified a potential future risk due to the regulation of this type of finance. New draft legislation is set to address this gap.</p> 	<p>5</p>  <p>PRODUCT SAFETY:</p> <p>Preventing hundreds of thousands of potentially unsafe products from entering the Irish market because of safety concerns.</p>	<p>6</p> <p>CAR CRIME:</p> <p>Proactively tackling car traders who misled consumers in selling clocked or crashed cars. In one case we secured the first custodial sentence.</p> 	<p>7</p>  <p>HOUSEHOLD WASTE COLLECTION MARKET:</p> <p>Publishing a report assessing the household waste collection market from a competition, consumer protection and regulatory perspective.</p>
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<p>8</p>  <p>PROTECTING CONSUMERS:</p> <p>Addressing breaches of consumer protection law, including issuing 28 Compliance Notices and 52 Fixed Payment Notices to bring about compliance and end damaging practices.</p>	<p>9</p> <p>MERGER REVIEWS:</p> <p>Securing Ireland's first criminal conviction for a non-notified merger with two guilty pleas and introducing a Simplified Merger Regime.</p> 	<p>10</p>  <p>INVESTIGATIONS:</p> <p>Investigating various potential breaches of competition law including two ongoing investigations in the ticketing and motor insurance sectors.</p>	<p>11</p> <p>BUSINESS COMPLIANCE:</p> <p>Undertaking a number of new proactive and preventative compliance activities to improve businesses' awareness of how to comply with competition and consumer protection law. This included our first major business information campaign on selling online.</p> 	<p>12</p>  <p>FINANCIAL WELL-BEING:</p> <p>Undertaking the first financial well-being study conducted in Ireland, and utilising this information for the benefit of our financial education work.</p>	<p>13</p> <p>CONSUMER INFORMATION:</p> <p>Providing information to over four million visitors to our website, over 120,000 individuals who contacted our helpline and through our awareness campaigns targeted at important consumer issues.</p> 	<p>14</p>  <p>COVID-19 RESPONSE:</p> <p>Launching a dedicated COVID-19 online consumer hub, enabling the timely provision of safe and compliant protective facemasks for consumers and increasing our focus to ensure that businesses complied with the law, irrespective of the challenges that they face.</p>
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Demands on the CCPC's resources, and the breadth of our remit have increased progressively over the past three years, as evidenced in our annual reports. With the future challenges ahead there will be further demands on our resources, and in a complex and evolving world, we need to continually reassess our priorities and activities. It is more important than ever that the CCPC is robust, focused and efficient in our work and identifies areas where we can make the greatest difference. A key focus in the new Strategy Statement will be capturing and measuring those impacts over the next three years.

As an organisation the CCPC has worked to adjust and expand to meet our increased responsibilities, demands and challenges, in terms of new legislation and also in preparation for the impact of Brexit. In the last three years, we have increased our headcount by 28% and we have invested resources and skills into areas which needed the greatest focus. This involved a considerable volume of recruitment, continual professional development (CPD) initiatives and innovative thinking. Our people come from a variety of backgrounds and specialisms and we have worked together successfully to bring their experience and expertise to bear. Our Strategy Statement 2018-2020 has seen the CCPC successfully grow as an organisation in terms of scale and impact and in our next strategy we will seek to build on this.

CONTEXT AND DIRECTION

The CCPC's 2021-2023 Strategy Statement has been developed as we face into a period of considerable change and uncertainty. In the course of developing this strategy, the CCPC consulted internally with staff, and externally with stakeholders to obtain their views on the CCPC's operating environment and where they believe we should focus our efforts. There were many valuable insights, more than could be published, all of which have been extremely beneficial in helping shape the direction of this strategy, and specific priorities for action over the course of the next three years.

In terms of the CCPC's operating environment at a top level, there were four overarching themes:

- 1 NEW POWERS:**
New competition, consumer protection and product safety legislation will have significant impacts across our remit. The CCPC will prepare for it whilst keeping our current work on track.
- 2 SIGNIFICANT CHANGES AHEAD FOR CONSUMERS AND BUSINESSES:**
The need to stay ahead in assessing and responding to the impact of Brexit and COVID-19 on consumers, businesses and competition.
- 3 MARKET DEVELOPMENTS:**
Digital/online markets, the importance of understanding how these markets are evolving, how competition works in digital markets and how to help and protect consumers in this rapidly changing world.
- 4 SPEAK UP FOR CONSUMERS:**
The need for the CCPC to use our voice and influence to ensure that consumer interests and competition concerns are considered in legislative, regulatory and policy decisions.

Brexit, and the UK becoming a third country will have a particular impact on the CCPC's work. Our international relationships will be especially important in the coming years. To remain abreast of best international practice in regulation and help shape the international context we are operating in, we must maintain our close ties with the European Commission and our European counterparts, including the UK.

Digital services and online sales have opened up new opportunities for consumers. They can deliver increased choice, improved services and provide people with the convenience to shop whenever and wherever they like. The digital consumer world, however, also provides challenges for consumers. They must navigate increasingly complex products and services through technology. And there is a power imbalance due to the lack of transparency around who consumers are buying from and what they are buying. Adapting our information to ensure that we respond to the changing environment is an important priority for the CCPC.

Our operational success relies upon the CCPC being able to continue to attract and retain high performing and collaborative people whom we equip with the right skills, tools and knowledge. Given its significance the CCPC has a separate supporting strategy focused on our staff and organisational development. Our 'People Strategy' will be developed in the context of this Strategy Statement to support the needs of our people

and organisational structures. An important priority in the coming years will be supporting our staff through COVID-19. This will require continuous investment in tools and resources that support our people to manage their well-being, facilitate flexible work practices and provide contemporary learning and development for CPD through online platforms.

In a complex and evolving world, the CCPC needs to continually reassess our priorities and activities, anticipating and responding to evidence of consumer detriment. As we look ahead it is clear that this work will be ever more important. The challenges our economy is currently experiencing will need to be addressed and our vision for open and competitive markets where consumers are protected and businesses actively compete, must remain at the heart of our work.

Taking all of this context into consideration, the purpose of the CCPC's 2021-2023 Strategy Statement is to set out a high level framework that enables us to deliver tangible, relevant and impactful strategic outcomes within the resources available to us. The framework will then form the basis of the implementation process which will enable the CCPC to respond with flexibility and continued clarity in our strategic direction.

OUR MISSION, VISION AND VALUES



Our mission is to use our knowledge, skills and statutory powers to promote competition and enhance consumer welfare



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



Our values are;
Open Communication
Empowerment
Independence
Ambition
Excellence

OUR STRATEGIC GOALS FRAMEWORK 2021 – 2023

<p>1</p>  <p>We will use our powers to deliver effective enforcement and compliance outcomes</p>	<p>2</p>  <p>We will empower consumers to make informed decisions by providing information about their rights, personal finance and product safety</p>	<p>3</p>  <p>We will be a leading voice in representing the interests of consumers and promoting competition</p>	<p>4</p>  <p>We will continue to invest in our people, governance and infrastructure, continuously improving in a changing workplace environment</p>
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GOAL 1

OUR STRATEGIC GOAL

We will use our powers to deliver effective enforcement and compliance outcomes.



OUR AMBITION

To ensure that consumers' safety and welfare is protected from anti competitive, harmful practices and unsafe products.

OUR ACTIONS

- ▶ Increase our compliance and enforcement outcomes, including increasing our proactive inspections.
- ▶ Develop and employ a strategic plan to support the implementation and embedding of ECN+ legislation and the delivery of enforcement outcomes.
- ▶ Embed and utilise new consumer protection and product safety powers and tools.
- ▶ Scale up product safety activities including proactive market surveillance and product inspections.
- ▶ Deliver targeted business engagement and guidance resources to increase compliance.
- ▶ Communicate enforcement and compliance outcomes clearly and consistently.
- ▶ Ensure that relevant traders comply with the 2016 Grocery Goods Regulations, monitor annual compliance reports and conduct on site inspections to check compliance with the Regulations.
- ▶ Engage with and participate in joint enforcement and compliance actions with the European Commission and other agencies.
- ▶ Improve our merger control process in light of European developments.
- ▶ Utilise information, market monitoring and intelligence, including helpline data, to inform compliance and enforcement strategies and priorities.

OUR MEASURES

Along with our actions we will demonstrate:

- ◐ Increased outcomes across all enforcement activities.
- ◐ Increased levels and visibility of direct engagement with businesses to achieve compliance.
- ◐ Increased number of inspections and compliance sweeps.
- ◐ Improved average timeframe for Phase 1 merger review decisions.



GOAL 2

OUR STRATEGIC GOAL

We will empower consumers to make informed decisions by providing information about their rights, personal finance and product safety.





OUR AMBITION

To ensure that consumers have access to trustworthy information to help them make confident decisions and understand the risks, particularly when buying in complex and changing markets.

OUR ACTIONS

- ▶ Increase consumer awareness of the CCPC’s tools, information and helpline.
- ▶
- ▶
- ▶ Use market intelligence, consumer research and behavioural economics to inform our consumer awareness campaigns and the provision of consumer information.
- ▶ Review the CCPC’s consumer information and money tools to ensure they meet the developing needs of consumers.
- ▶
- ▶ Review and redevelop our Customer Service Charter and Public Sector Duty to reflect the CCPC’s current service delivery and consider innovative and additional approaches to interacting with our stakeholders.
- ▶

OUR MEASURES

Along with our actions, we will demonstrate:

- ◐ Increased engagement with consumers using all of our communications channels and programmes.
- ◐ Targeted information campaigns to support identified communication priorities.
- ◐ Increased organisational awareness (consumers and businesses).
- ◐ Customer satisfaction with our helpline.
- ◐ Increased social media reach and engagement.



GOAL 3

OUR STRATEGIC GOAL

We will be a leading voice in representing the interests of consumers and promoting competition.





OUR AMBITION

To make markets work better for consumers by representing their interests nationally and internationally. In doing so, grow public understanding of the importance of open and competitive markets and influence public policy and legislation.

OUR ACTIONS

Use research and market studies to promote changes that make markets work better for consumers. Where appropriate make proposals on how legislation can be improved to address identified issues.

Ensure that consumer interests and competition concerns are given appropriate consideration in legislative, regulatory and policy decisions by working with Government departments, regulators and other State agencies.

Carry out research and gather evidence, through stakeholder engagement, and by utilising intelligence gathered from market monitoring and other sources to develop the CCPC's policy positions.

Increase the CCPC's impact in international working groups and bilaterally with relevant organisations.

Carry out research and promote financial well-being, working closely with relevant organisations in the financial and public sector.

Develop advocacy positions and identify opportunities for mutual support with the CCPC's diverse stakeholders by working in collaboration and sharing knowledge with them.

OUR MEASURES

Along with each of our actions, we will demonstrate:

- Increased number of completed market studies and research projects.
- Engagement with stakeholders to progress recommendations from market studies and research projects.
- Input to Government policy development, legislation and initiatives, where appropriate, and responses to consultations.
- Constructive engagement with other National Competent Authorities.



GOAL 4

OUR STRATEGIC GOAL

We will continue to invest in our people, governance and infrastructure, continuously improving in a changing workplace environment.



GOAL 4

OUR AMBITION

To support staff in developing their potential in a changing workplace. We will also ensure that the CCPC has effective processes and procedures in place to ensure that we provide value for money and uphold good corporate governance and integrity.

OUR ACTIONS:

Deliver a new people strategy to support and develop our people to meet their potential.

Support growth, continuous improvement and innovation through the professional development of our people.

Develop best workplace practices to meet the changing needs of our workforce.

Develop an ICT strategy to provide systems and infrastructure to enable effective and flexible working.

Participate in European and national actions to promote the Green Agenda in the context of our work.

Optimise our technologies and expertise to grow our digital intelligence capability.

Learn from international practice in effectively implementing and deploying new powers.

Work with our parent Department in undertaking a review of the CCPC's functions through Periodic Critical Review.

Apply high standards of governance to the running of the CCPC and actively managing risk including regular reporting to the Audit and Risk Committee.

Ensure value for money through effective procurement and financial management including the collection and use of the Financial Services Levy.

OUR MEASURES

Along with our actions, we will demonstrate:

- The benefits and effectiveness of our supporting strategies.
- Delivery of a workplace plan taking into account remote working.
- Successful completion of internal and external audits and addressing recommendations.
- Growth in capability and expertise through representing Ireland at meetings of relevant EU and international working groups, international forums, conferences and networks.

DELIVERING AND MEASURING PERFORMANCE

1



PROGRAMMES OF WORK

The CCPC's 2021-2023 Strategy Statement sets out overarching goals to be achieved over the next three years. These will be delivered and reviewed through the CCPC's annual work programme planning. Each plan will incorporate the strategic measures alongside each strategic goal.

2



MEASURING PERFORMANCE

Each strategic goal identifies key actions and additional metrics which are the intended outcomes of this Strategy Statement. Progress on the annual programmes of work that implement this strategy will be monitored. In addition, the CCPC has an oversight and performance delivery agreement with our parent Department, the Department of Enterprise, Trade and Employment.

3



OUR PUBLIC SECTOR DUTY

Over the course of the previous Strategy Statement, the CCPC undertook a number of steps, both internally and externally, in the fulfilment of our 'Public Sector Duty' in relation to eliminating discrimination, promoting equality of opportunity and treatment, and protecting the human rights of both staff and those we provide services to.

In preparing this strategic plan, the CCPC has reviewed the human rights and equality issues that are relevant to our functions which remain the same as those listed in the 2017-2020 Strategy Statement.

The areas of focus are:

- 1 Our engagement with the public, both directly and indirectly, through our role in providing information and raising public awareness.
- 2 Our enforcement and compliance activities, including our engagement with members of the public in the course of carrying out those duties.
- 3 Our workplace policies, practices and development supports.

In line with our obligations under the Irish Human Rights and Equality Commission Act 2014 we are fully committed to furthering our work in reviewing internal work plans, policies and procedures through the lens of human rights and equality. The annual reports published under this Strategy Statement will report on the CCPC's developments and achievement in that regard.

APPENDIX 1: EXTERNAL CONSULTATION

The CCPC would like to thank those who responded to our public consultation and the following stakeholders who made contributions in the course of the development of this Strategy Statement. The opinions and views expressed were important to the development of this document and we look forward to engaging with our stakeholders over the next three years in working towards achieving our common goals.

- Advertising Standards Authority of Ireland
- A&L Goodbody
- Commission for Regulation of Utilities
- Central Bank of Ireland
- Commission for Communications Regulation
- Department of Enterprise, Trade and Employment
- Department of Finance
- Dr. Fidelma White (University College Cork)
- Dr. Cliona Kelly (University College Dublin)
- Economic and Social Research Institute
- Free Legal Aid Centre (FLAC)
- Legal Services Regulatory Authority
- Mason Hayes & Curran
- Matheson
- McCann FitzGerald
- National Competitiveness Council
- Paul Gorecki (Competition Economist, Dublin)
- Professor Mary Donnelly (University College Cork)
- Professor Patrick Paul Walsh (University College Dublin)



Coimisiún um
Iomaíocht agus
Cosaint Tomhaltóirí

Competition and
Consumer Protection
Commission