

## **SIAA Response**

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### **A Consumer Body for Scotland**

September 2018

#### **1) Do you have any comments on the consumer landscape in Scotland?**

Scottish Independent Advocacy Alliance (SIAA) recognise the need for a national body to be created in Scotland. We welcome the fact that it is recognised that the consumer landscape and issues faced by consumers in Scotland can be different to that of England and Wales as a result of demographics and geography which create distinct and unique differences for Scottish consumers.

#### **2) Do you agree with the proposed functions of Consumer Scotland?**

Yes. We believe that following the abolishment of Consumer Focus in Scotland, there is room for additional research and advocacy in this area. We welcome the proposals put forward in the consultation document and particularly welcome the fact that Consumer Scotland will be an independent statutory body at arms-length from the Scottish Government.

#### **3) Which powers and duties would you like Consumer Scotland to have in order to carry out its proposed role?**

We would like to see Consumer Scotland improve co-ordination and bring a more joined up approach to the consumer landscape in Scotland. We believe consumers should be at the heart of Consumer Scotland and any systems put in place should be as easy as possible for consumers to navigate.

As well as the functions mentioned in the consumer document we would like to see Consumer Scotland have powers of monitoring and enforcing.

We believe it is important that Consumer Scotland has a 'research' function which could work to collect evidence of where there are issues for consumers as well as forecasting where there will be emerging issues. We believe Consumer Scotland should play a role in bringing a voice to these issues and highlighting them.

Additionally, we would like to see a commitment to ensure that Consumer Scotland is sufficiently resourced and prioritised.

**4) What are the criteria that would constitute a specifically Scottish consumer issue?**

These should include matters which fall under devolved areas but also, in a wider sense, any matter which affects Scottish consumers (not necessarily exclusively, on the basis that markets don't tend to be governed by administrative boundaries). We welcome the idea that Consumer Scotland will be 'Scotland-focused' and that there is recognition that there is a different consumer landscape in Scotland compared to England and Wales.

**5) Which criteria might Consumer Scotland consider when accessing the level of harm needed to be reached before an investigation is pursued?**

The overall extent of any impact, including the potential future risks, and the extent to which the matter is not, or has not already been, covered by another body's jurisdiction.

We believe that matters which cause, or have the potential to cause, specific harm to vulnerable consumers should be given extra weight.

**6) Are there additional functions you think Consumer Scotland should have to allow it to deliver impacts for consumers in the current landscape?**

As mentioned in our answer to question 3 we would like to see Consumer Scotland have powers of monitoring and enforcing as well as a research function.

**7) Are there any additional functions Consumer Scotland should have that will enable it to adapt and respond to future consumer challenges?**

We welcome the fact that Consumer Scotland will be staffed by policy and/or sector experts. However, we believe that it is of equal importance that the body is sufficiently resourced to allow those individuals to keep up-to-date with industry and sector changes. We have previously mentioned the benefit of having a research function which we believe would help achieve speedier responses to emerging issues. We believe it would be of great benefit if a research and insight team were to work proactively with policy makers.

There could also be space for patterns in consumer issues reported at a local level to be fed into the research function if there was a system in place for doing this.

**8) What are your views on the current consumer advice system? How could it be strengthened?**

We believe there are distinct advantages in a single point of entry for all consumer issues – these could then be triaged to the relevant organisations. We believe this joined up approach will make the consumer advice system more accessible and easier for consumer to navigate. We know that in some areas it is difficult to access consumer advice, especially for marginalised groups, and we would hope that this new approach would improve access and ease of access.

**9) What are your views on how the Scottish Government could improve how it commissions and funds advice to individuals?**

As mentioned above, we think a key strength of Consumer Scotland could be to provide a ‘one stop shop’ for the consumer advice system which would enhance the provision of consistent and joined up advice to consumers. We would like to see the Scottish Government considering the barriers which people may face when accessing advice services and putting measures in place to limit these barriers.

**10) How can advocacy develop greater capacity to bring change for consumers?**

We believe that, in order to be truly effective, the voice of the consumer needs to be at the heart of Consumer Scotland. In particular those voices which are currently unheard because of factors including the power imbalance between consumer and service/product provider need to be heard.

**11) What are your views on whether there should be a duty on public authorities to consider the impacts on consumers of policies or decisions?**

We would greatly welcome this move.

**12) Beyond the actions set out in section 2, how should Scottish Government use its resources and powers to improve outcomes for consumers?**

We would like to see a set of principles created which seek to ensure that Consumer Scotland improves outcomes for consumers. Some principles which we believe would be important to include are: prioritising the consumer; value for money; and public interest.

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The Scottish Independent Advocacy Alliance (SIAA) is Scotland's national membership body for advocacy organisations. The SIAA promotes, supports and defends independent advocacy in Scotland. It aims to ensure that independent advocacy is available to any person who needs it in Scotland.

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