

Emailed to: [ProjectOIMExternal@cma.gov.uk](mailto:ProjectOIMExternal@cma.gov.uk)

16 July 2021

Dear Sir/Madam,

### **CMA Draft guidance on the Operation of the CMA's UK Internal Market Functions**

I write in response to the CMA consultation on Operation of the CMA's UK Internal Market Functions and thank you for the opportunity to submit a response.

Ombudsman Services (OS) is a not-for-profit, private, limited company established in 2002 and we run a range of discrete, national Alternative Dispute Resolution (ADR) schemes across different sectors. We are the sole ADR scheme in the energy sector, the Ofgem-approved Energy Ombudsman. We are one two ADR schemes operating in the communications sector and we also run an appeals service in private parking. Each scheme is funded by the companies under our jurisdiction and our service is free to consumers. In 2019 we received 157,808 initial contacts from complainants and resolved 88,840 complaints.

We operate at a critical juncture between suppliers, consumers and the government to resolve complaints and mediate disputes. Our focus has become more explicitly systemic and preventative as we have built up expertise in understanding where consumer trust is under threat and how best we can work with industry, regulators and policymakers to recover it.

We support the creation of the Office for the Internal Market (OIM) and the associated activities which it will be responsible for carrying out - independent advisory, monitoring, and reporting functions and providing non-binding technical and economic advice to all four UK Governments, and supporting the development and effective operation of the UK internal market on an ongoing basis.

Its work will assist governments in understanding how effectively companies are able to sell their products and services across the 4 nations of the UK, and the impact of regulatory provisions on this, including the impact on competition and consumer choice, for assessment alongside wider policy considerations. We think that the processes for considering requests for advice and what monitoring work will be undertaken seem sensible. We also support the prioritisation principles set out in the document and the analysis and assessment that will take place to determine whether regulatory divergences are having negative impacts. We agree that it is important in a post Brexit UK to ensure that markets work well for consumers and businesses.

We are pleased to see that as part of the principles applied in the work of the OIM, consideration will be given to the impact on consumers; both generally and with a particular focus on disadvantaged or vulnerable consumers in terms of price, quality, range, and service.

We are happy to share any data or insight that we have if this is required to support the work of the OIM. We invest heavily in building our data and insights capability.



Please do not hesitate to contact us if you would like further information regarding our response. Our response is not confidential.

Your sincerely,

[Redacted signature]

[Redacted name]

**For more information regarding this consultation please contact:**

[Redacted contact information]

[Redacted contact information]