

Emailed to: consumerguidance@cma.gov.uk

23 January 2025

The Competition and Markets Authority (CMA) consultation on draft Consumer Protection: enforcement guidance.

Thank you for the opportunity to comment on the draft guidance that sets out the CMA's role and powers related to consumer protection.

Trust Alliance Group was formed in 2022 and comprises several businesses that were previously part of Ombudsman Services, including the **Energy Ombudsman** and **Communications Ombudsman**, approved by Ofgem and Ofcom respectively. Within Trust Alliance Group we also have **Flexible Resolution Services** (which operates a private parking appeals service), **Lumin** (a software development company) and **The Internet Commission**.

Q1. Do you have any comments on the structure or clarity of the Draft Guidance?

We think that that the structure of the draft guidance makes sense, and that it offers sufficient clarity on the prioritisation principles; how it co-operates with the other enforcement partners and the use of civil enforcement powers.

Q2. Does the guidance offer sufficient clarity about how the CMA proposes to carry out its enforcement functions?

We think it's important to keep this guidance under review to ensure it keeps pace with market changes, certainly where consumer detriment occurs in unregulated areas or crosses sectoral boundaries; this could be where additional clarity may be needed on roles and responsibilities of the CMA and other consumer protection enforcers and compliance partners.

We also think that data and insight are important, and it's important to engage with other stakeholders, such as ombudsman, to understand where there may be new areas of detriment in emerging markets. We have worked closely with the CMA in the past, for example, in relation to the market enquiry into heat networks and green heating. We are happy to continue to share our data and insight and welcome the opportunity to engage with the CMA further.

[Redacted signature block]