

CAA Consumer Panel

Annual Report for the year ended
31 March 2021



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About the CAA Consumer Panel

Who we are

The CAA Consumer Panel is a group of eight independent experts, who bring together deep consumer expertise and experience along with strategic thinking, applying these in a practical way to improve the aviation experience for consumers. The Panel members' biographies can be found at the end of this document.

What we do

The Panel acts as a non-statutory critical friend, giving expert advice to the CAA as policy is being developed, and making sure the consumer interest is central. The Panel's objective is to champion the interest of consumers.

The key activities of the Panel are to:

- Help the CAA to understand fully, and take account of, the interests of consumers in its policy development and decisions.
- Use existing CAA research, request the CAA undertakes new targeted research, and gather intelligence, in order to understand the aviation consumer experience.
- Provide the CAA with feedback from a consumer perspective on the effectiveness of its policies and practices.

Our remit

The Panel focuses on the interests of current and potential aviation consumers. Citizen or community issues, such as noise from flightpaths, do not fall under our remit.

Chair's Foreword

It goes without saying that it has been an exceptional year for the whole of the UK, and the aviation sector has been particularly hard hit. The context in which we write our annual report as the CAA Consumer Panel is unlike any other.

Circumstances have changed rapidly and unexpectedly, and we have adapted our work plan to take into account the changing context. In particular, we devoted a lot of time to researching and evaluating how to rebuild consumer confidence as the sector reopens to ensure a rapid and consumer-focused restart. This work was fed into the CAA, as it considers both current travel and sector restart, and to DfT to contribute to the Global Travel Taskforce report on restarting international travel.

Alongside work driven by the pandemic, we continued to deliver our planned work programme, including on environmental information, vulnerable consumers, and complaints handling. Many of these aspects (in particular the treatment of vulnerable consumers and good complaints handling) are especially important in the context of the pandemic, where consumer problems may be exacerbated by health measures and new travel rules if care is not taken to avoid this.

We have been supportive of a number of areas of the CAA's work this year, particularly work being done to explore consumers' appetite for and understanding of information about the carbon footprint of flying, and work to help the regulator recognise and respond to consumer vulnerability. We also supported some of the amendments the CAA has made to its policy for approving Alternative Dispute Resolution bodies.

But there have been other areas where we have been very disappointed, particularly around how the decision to close Heathrow's Consumer Challenge Board was communicated to the Panel. We are disappointed that decisions about Heathrow's future development will now have less consumer input and will be the poorer for it.

We acknowledge that it has been a particularly challenging year for the CAA and the whole aviation sector. Placing consumers at the heart of decision making will help the sector to be able to restart successfully and build back the market as fast as possible. We look forward to a more positive year ahead.



The Right Hon Jenny Willott OBE
CAA Consumer Panel Chair

Chapter 1

How we work

Our aims

The Panel exists to make sure that the consumer interest is placed at the heart of the CAA's work, helping the CAA to deliver its objective of empowering consumers. We want to see markets and regulation that focus on the clear interests of existing and future aviation consumers and that work well to ensure effective airline competition on price and service quality. Airports should provide an affordable, good quality and consumer-focused service. Empowered consumers should be able to make informed decisions about which companies to use. Airline services and airport environments should be designed and delivered to ensure accessibility to everyone, and people who may need extra help should be supported to make sure they can effectively access the market. And when things go wrong, consumers should have quick, fair and easy access to redress.

How we prioritise our work

The Panel is a small, specialist policy resource for the CAA and delivers high quality, evidence-based advice in a way which is designed to maximise its impact. The Panel therefore prioritises its work carefully, asking four key questions before embarking on any given project:

- Is the issue important for aviation consumers?
- Does it fall within the Panel's remit?
- Is it an area where the CAA is best placed to effect change?
- Is it (or should it be) a priority for the CAA?

The Panel also prioritises the interests of consumers it considers to be at greater risk of vulnerability throughout its work.

Chapter 2

Understanding our impact

This report covers the year to 31 March 2021. Over the year we focused on the key themes from our 2020-2022 work programme of building the evidence base, driving better outcomes for consumers, and influencing future frameworks. This year, due to Covid-19, our work programme flexed to take into account the impact on the aviation industry. April and May 2020 saw passenger numbers fall by almost 98% on 2019 figures. This has been devastating for the industry and has also meant changes to the work of the CAA, as well as to our own work programme.

We note here our important ongoing relationships with a range of stakeholders. As well as the CAA these include industry representative bodies, other regulatory consumer panels and consumer organisations, and third sector bodies with whom in a more usual year we would meet more regularly. As a small policy advisory body embedded within the CAA, these relationships allow us to work collaboratively and maximise our influence with decision makers. The stakeholders we met with over the course of the year are listed in Chapter 3. The list this year is shorter than usual as we recognise the impact Covid-19 has had on both the aviation industry and across the wider economy.

Below we set out the work we have undertaken over the year, along with our plans for the year to come.

Building the evidence base

A strong evidence base is crucial to ensure that policy is developed reflecting consumers' wants and needs and is correctly targeted. Our work programme committed to continue to input to the design of the Consumer Aviation Survey, provide advice on new questions and areas to explore, and offer insights and analysis of the results for each wave.

What we did: CAA Consumer Aviation Survey: Over the course of 2020-2021 we continued to emphasise to the CAA the importance of building its consumer evidence base. This became especially key as the effects of Covid-19 on aviation and travel started to become apparent. We understood the CAA's decision to pause its Aviation Consumer Survey during the first half of 2020 as passenger numbers were low and this would have affected the sample. But there were opportunities missed later in the Summer to undertake other more specific or directed research into the effects of the pandemic on travel as the year unfolded, which would have helped to shape understanding in the context of restart and recovery.

The Aviation Consumer Survey did restart later in the year, with fieldwork taking place in November and December 2020. We felt that communication with the Panel around this wave of the survey was poor. We emphasised to the CAA the importance of unpicking and

understanding differences in experiences and perceptions between those who flew before the pandemic started and those who flew during the pandemic. This is key because the data from the survey will help to shape the response of the CAA and others as we move towards sector recovery. We also underlined the importance of consulting the Panel at an early stage, which would help to make the methodology and presentation of the results more robust.

As the CAA considers changes to the Aviation Consumer Survey in future, we have asked the CAA to look at the full consumer evidence base available to it, conduct a gap analysis, and use this to inform decisions on what further evidence/research is required to shape the future of the Aviation Consumer Survey. We look forward to continuing to work with the CAA to ensure the consumer evidence base upon which policy and enforcement decisions are made is strong and robust.

Driving better outcomes for consumers

The Panel's focus is on improving the aviation experience for current and potential aviation consumers. Whilst a key concern is price, it is also important that useful, comparable information on quality is available so that consumers are able to make informed comparisons and vote with their feet. Where outcomes are regulated by the CAA, our aim is to ensure that the consumer interest is reflected throughout the design of the regulatory process. The needs of consumers at risk of vulnerability should be taken fully into account so they are also able to participate in the market effectively. And we believe consumers need to be able to seek quick, fair and equitable resolutions when things go wrong, and complaints data should be used systematically by industry to inform improvements over time.

What we did: Environmental information: Improved environmental information is something which consumers are increasingly indicating they would like to see more. It is a strategic priority for the CAA and will contribute to a green recovery for the sector. Our work programme said we would work with the CAA to explore consumer views on environmental information in more detail, including what consumers want to use environmental information for and how this could best be delivered.

Therefore, this year we worked with the CAA to explore the topic further, including contributing to an insight note which the CAA developed to scope the topic and provide the basis for further work by both the CAA and industry. We fed back to the CAA team on work being done to map input to the design of research exploring how consumers view environmental information. We then contributed to the second phase of the work, in particular through input to the design of research which was undertaken to explore what types of information consumers want and how this could best be delivered. Panel input included feedback as the methodology was developed, ensuring that the Covid-lens and changing consumer expectations were taken into account. The Panel has been impressed by the work the CAA has done in the area to date and looks forward to continuing to contribute to this important area as the research findings are taken forward.

What we did: Economic regulation of Heathrow: It is key that regulated outcomes in dominant markets, such as Heathrow Airport, reflect the consumer interest as it is existing and future passengers who pay for airport services via their airline ticket. Our work programme said we would help to ensure the CAA's approach to economic regulation, including the new H7 price control and the proposed expansion of Heathrow, takes into account the interests of consumers, alongside the work of the Heathrow Consumer Challenge Board.

Of course, Covid-19 and other factors have brought about many changes since our work programme was published in April 2020. One of these was the decision taken by the CAA to close the Heathrow Consumer Challenge Board (CCB) in May 2020. We were extremely disappointed by the way in which the decision was taken by the CAA and communicated to the Panel. It was clear to the Panel that, in the absence of the CCB, no mechanism existed to ensure the consumer interest would be taken into account. The Consumer Panel is a small resource which looks across the breadth of the CAA's work and it is neither constituted nor resourced to consider specific economic regulation decisions in detail. Nor is it our role to provide the detailed, direct challenge to Heathrow Airport Ltd (HAL) that was the key remit of the CCB. It was not apparent to us that thought had been given to this aspect prior to the decision taken to abolish the CCB.

We therefore worked with the CAA to improve communications with the Panel, and we asked the CAA to develop a plan to ensure that the consumer interest in decision making on the economic regulation of Heathrow was not diluted by the absence of the CCB and took due account of the CCB's published report on HAL's Interim Business Plan. While the bilateral challenge process between HAL and the CCB has not been replaced, the CAA has worked to enhance the consumer voice in its approach to H7, through working with the Panel, and we are grateful to the team within the CAA's economic regulation department for their constructive approach. We continue to provide input on the regulation of Heathrow. However, our focus remains on scrutinising the CAA and how it ensures the consumer interest is taken into account, rather than looking in detail at the work being done directly with HAL at both strategic and operational level, which was the CCB's role.

What we did: Economic regulation of NATS En Route plc: This year we offered feedback on the CAA consultation on *Economic regulation of NATS En Route plc: Consultation on the approach to the next price control review (CAP 1994)*. Whilst we recognised the unprecedented circumstances faced by the whole aviation sector as a result of the pandemic and the additional pressures on the nature and process for economic regulation of NATS, we were concerned that sufficient weight was not being given to understanding the needs of the consumer in both the process for and outcomes of the economic regulation of NATS. Since then, the CAA has suggested work to establish exactly where the consumer interest lies in this area of regulation, and whether airline/user interests can genuinely act as a proxy for the consumer interest. We look forward to continuing to work with the CAA in this area and would very much support the above research.

What we did: Improved understanding of consumer vulnerability: The Panel proposed a definition of consumer vulnerability, which it asked the CAA to adopt, and suggested that the CAA develop a holistic, embedded approach to how it recognises and responds to consumer vulnerability across the breadth of its work, and line with good practice in other regulated sectors. We are pleased that the CAA has now gained senior leadership endorsement for this work, adopted the Panel's definition, and set up a workstream which is bringing together the work the CAA currently does in this area along with future plans. The Panel has been consulted throughout the year as the project has been to ExCo and plans have been developed. We have offered guidance on specific areas, including how ATOL claims could be prioritised taking into account those in potentially vulnerable circumstances. We look forward to continuing to offer help and advice as the work is operationalised and taken forward by the different areas of the CAA.

What we did: Complaints handling and ADR: An area of particular importance for the Panel has long been complaints handling and Alternative Dispute Resolution (ADR) in the aviation sector, where we strongly believe that ADR should be mandatory and concentrated in a single scheme. This year, recognising that opportunities to mandate ADR have not been available, we concentrated on other improvements which can be made in a shorter timeframe.

We responded to a CAA consultation on *Policy for ADR applicants and approved ADR entities* (CAP1324). We were disappointed by a number of elements of the consultation, and in particular by how poorly it was presented. The consultation did not explain the intention behind the proposals, their effects, how they might work in practice, and how they could impact consumers. We made various technical suggestions and despite the poor presentation of the consultation, ultimately we supported a number of the CAA's proposals, which we thought did have merit for consumers. Given the poor presentation, we suggested the CAA should publish an in-depth response to the consultation, with its views on the issues and questions posed by respondents and setting out a proposed way forward. We were pleased that this was done later in the year and that some of the Panel's suggestions had been taken forward. We note that the CAA has committed to review how the policy is functioning in practice within the first two years of its implementation and intends to assess the benefits, or otherwise, to consumers at that stage. We expect the Panel to be engaged in this assessment at an early stage, alongside other consumer organisations.

Later in the year the Panel was asked to assist the CAA as it developed and published a new process for handling complaints made to it about the ATOL claims process. We made a number of suggestions, including on making the process more accessible and easier to understand. We were pleased that the CAA implemented a number of these suggestions, which should make it easier for those who need to contact the CAA regarding their complaint and understand how it will be handled.

The Consumer Panel's emphasis on redress resulted in the commissioning of a quality audit of ADR schemes. The Panel helped design the scope and reviewed the draft report.

We commented in detail on the methodology and drafting, resulting in improvements to the final report, which was published by the CAA in February 2021.

In addition, we have been involved in discussions around the CAA's plans to consult on ATOL reform, and we were pleased to have the opportunity to input to this at an early stage. We have also been involved in the CAA's consideration of potential gaps and overlaps in the airline compensation and refund framework following Brexit and we will continue to support this work.

Influencing future frameworks

The Panel recognises the many significant changes and challenges taking place in the aviation sector at this time. Within this context, we have sought to improve outcomes for consumers by helping to make sure the right frameworks are in place.

What we did: Supporting passenger confidence: The CAA Chief Executive and Board asked the Panel to consider how consumer confidence could be supported in the context of sector recovery from the impacts of the Covid-19 pandemic. Although this was not included in our original work programme, we recognise how fundamental the topic is and as the sector moves towards recovery, we want to ensure that the consumer voice is articulated strongly and that it is heard. We were pleased to be able to contribute to developing policy and thinking.

We reviewed the available evidence and published a paper setting out our views and recommendations. We set out three areas where consumer confidence could be supported as recovery takes place: physical confidence in health measures; the ability to easily find relevant, timely information; and financial security. As the CAA's specialist Consumer Panel, our recommendations were targeted to areas where the regulator has locus. However, we also recognise that in many cases the CAA will need to work collaboratively and not all of the areas explored fall within the CAA's remit. Where others are best placed to act, or have a role to play, we highlighted this and targeted our recommendations to those organisations.

Health measures

We cautioned that as demand begins to increase there is a need to manage staff levels (including bringing back staff who may have been furloughed for long periods of time, providing refresher training etc) and passenger flows (especially in the context of social distancing) to make sure that service levels are maintained. Good practices could be shared, and consistency is key, in particular due to the international nature of aviation. The CAA is well placed to do this. And as technology develops, it is important to recognise that whilst many are likely to benefit, others may fall behind. Inclusion does not only apply to physical provision of services. It is also important to make sure that information provision does not create new barriers to accessing information for some groups, for example by increasing reliance on technology (which not everyone can or wants to use).

Information provision

We recommended that improvements be made to the availability of information and the importance of making sure it is clear and easy to understand. We said more could be done to ensure information is made available in a timely manner so that passengers are able to plan and take all the steps needed (such as obtaining a negative test result in the correct format). In addition, the CAA could develop a better understanding of the different consumer groups looking for information, what information they want, how they access that information, and who is best placed to provide it. We recognise that the regulator is not necessarily the 'go to' place for information, which might best be provided by others such as industry, consumer organisations, or Government agencies. Having said that, the CAA could improve the way its own information is provided and by understanding what consumers want, could also facilitate better provision of information by others.

Financial security

We underlined how important the issue of consumer trust in refunds is and suggested a trust building exercise to highlight consumer rights and the fact that all UK airlines are now paying refunds to consumers in a timely manner. We also underlined the increasing importance of accurate information on travel insurance and on flexible booking policies.

What we did: Input to development of the CAA's strategic framework: Over the course of the year the Panel has given input to development of a refreshed CAA strategic framework including working with the relevant project team and holding a workshop with the CAA Chair. We focused on ensuring the consumer interest is given sufficient weight as the strategy is developed. We were particularly pleased to see that the Panel's suggestion that consideration should be given to making sure consumers are not disproportionately impacted by how costs stemming from the pandemic are allocated has been taken into consideration by the CAA.

What we did: Using the Consumer Principles: As part of the work on the CAA's strategy refresh, we suggested using the Consumer Principles as a way to help staff within the regulator (and more widely) understand where the consumer interest lies. The Consumer Principles are a long-established and internationally recognised way of analysing and defining the consumer interest in any situation. They can help to identify key subjects and questions that need to be considered further and provide a consistent framework for approaching issues. The principles are: access, choice, information, education, safety and quality, protection of economic interests, fairness and equity, redress, sustainability, privacy and representation. We published a document setting out the principles, what they mean, and how they can be applied by regulators. This has been referenced as part of the CAA's new regulatory principles and we expect to see it continue to be used by staff within the regulator as they carry out the regulatory functions.

Priorities for 2020-2022

The impact of the Covid-19 pandemic on the aviation industry has been absolutely enormous. Whilst we continue to focus on the themes of building the evidence base, driving better outcomes for consumers, and influencing future regulatory frameworks, we remain flexible and change our work plans where needed. As we look to deliver the second half of our two-year work programme, our plans include:

- Continuing our work on supporting passenger confidence in the context of aviation sector recovery, including by working with the CAA and the Department for Transport as they respond to the work of the Global Travel Taskforce.
- Supporting the CAA's call for greater consumer enforcement powers and helping to shape how this could best be delivered by Government.
- Continuing to work with the CAA to explore consumer views on environmental information in more detail, including how consumers want to use environmental information and how this could best be delivered.
- Continuing to press for improvements in protection, redress and how consumer complaints are dealt with by airlines and airports. This includes being cognisant of the work to reform the airline insolvency framework and considering the implications for consumers following the failure of Thomas Cook, and other failures driven by the pandemic.
- Prioritising the needs of vulnerable consumers including by providing input via specialist accessibility groups to enhance fairness for consumers at risk of vulnerability. We will also continue to support the CAA's work on vulnerability, which was initiated by the Panel.
- Contributing to the CAA's broader strategic thinking, in particular ensuring this retains an adequate focus on the consumer interest.

Chapter 3

Transparency

Expenditure

The Panel cost the CAA £68,634.00 in Chair and member fees and expenses in the year to 31 March 2021.

Panel meetings

In the year ending 31 March 2021, the Panel met formally four times. The minutes of these meetings are published on the CAA website (www.caa.co.uk/consumerpanel). In addition, various sub-groups of the Panel worked on individual work streams throughout the year.

Terms of Reference

The Panel's Terms of Reference are published on the CAA website (www.caa.co.uk/consumerpanel).

Working with stakeholders

The Panel primarily faces the CAA, providing advice and engaging with staff at all levels. In addition, in 2020-21, as part of its work with stakeholders our secretariat and members engaged with:

- Airport Operators Association
- Airlines UK
- Department for Transport
- Heathrow Consumer Challenge Board
- Transport Focus
- UK Regulators Network
- Which?

Chapter 4

Panel members and secretariat

Chair

Rt Hon Jenny Willott OBE, Chair

Jenny was appointed to the Panel in January 2018. Jenny was Member of Parliament for Cardiff Central for ten years, serving as Consumer Affairs Minister, with responsibilities including consumer policy, competition policy and employment law, Women and Equalities Minister and as a Government Whip. She is now the Director of Enterprise and Innovation at St Mary's University, Twickenham, and until December 2020 was a Non-Executive Director for the Independent Parliamentary Standards Authority. Prior to entering Parliament she worked in the voluntary sector, including as Chief Executive of Victim Support South Wales and Head of Advocacy for UNICEF UK.

Members

Carol Brennan

Carol is an Honorary Reader in Consumer Policy and former Director of the Consumer Dispute Resolution Centre at Queen Margaret University, Edinburgh. Carol was appointed to the Panel in October 2018. She is also a member of the Office of Rail and Road Consumer Expert Panel. She is Chair of the Qualifications and Awards Board for the Chartered Trading Standards Institute. Between 2015 and 2019, Carol was Chair of the Scottish Legal Complaints Commission Consumer Panel. During 2019/2020, Carol chaired a team of experts on consumer education and produced a policy options paper for the European Commission. Her research interests include consumer policy, complaint management, dispute resolution, consumer empowerment and customer experience. Carol draws on her research to influence new developments in strategy, policy and practice. She has produced reports on consumer representation, the outcome of complaints and using complaints to transform services.

Helen Dolphin MBE

Helen is a committed campaigner on improving transport for disabled people. After becoming disabled in her early twenties Helen trained as a journalist and worked for ITV Anglia News as a news reporter. She followed this by taking up the role of Director of Policy and Campaigns for a national disabled charity. Helen now works as an independent mobility specialist advising government, public, commercial and professional bodies on how to improve accessibility. Helen is a member of the Disabled Persons Transport

Advisory Committee (DPTAC), Joint Chair of the Heathrow Access Advisory Group, a Member of the British Science Associations Equality and Diversity group and Chair of her local mobility assessment centre East Anglia Driveability (EAD).

Trisha McAuley OBE

Trisha is an independent consumer expert and an experienced Non-Executive Director. For over twenty years she was a senior executive in UK and Scottish consumer organisations and is the former Scottish Director of Consumer Futures. She was awarded an OBE for services to consumer affairs in 2015. Trisha is currently the Independent Chair of National Grid's RII02 Gas and Electricity Transmission User Groups and Independent Chair of the Market Arrangements Code Panel which oversees industry self-governance in the non-household competitive retail water sector in England. She is also Independent Chair of two Electricity Code Governance Panels: the Grid Code Review Panel and the Connections and Use of Systems (CUSC) Panel. She is a Member of the Institute of Chartered Accountants Scotland Discipline Board, a Member of the Office of Rail and Road Consumer Expert Panel, and a Board Member of Transport Focus. Trisha is also a Board Member of Energy Action Scotland, the Independent Chair of SSEN's Inclusive Services Panel and a Member of the Scottish Government Energy Networks Strategic Leadership Group.

Walter Merricks CBE

Walter's career over the past 20 years has involved work with ombudsman and complaint services, competition and consumer protection systems and regulatory bodies in the retail financial services, gambling, surveying and legal services, press, telecoms, energy, copyright licensing and ATOL protection sectors. He was the inaugural Financial Ombudsman and worked with the Financial Services Consumer Panel between 1999 and 2009. He recently served on the board of the Gambling Commission, and now chairs the board of IMPRESS (the Independent Monitor for the Press).

Jacqueline Minor

Following a short period lecturing in law at the University of Leicester, Jacqueline Minor joined the European civil service, first at the Court of Justice and subsequently at the European Commission. After more than 20 years' working on Internal Market issues, including a period as Director responsible for Consumer Policy, she served as Head of the Commission's Representation in the UK from 2013 until retirement in 2017. She is a member of the Board of Governors of the University of Brighton, an Honorary Senior Fellow of Regent's University, London and a Governor of the National Institute for Economic and Social Research.

David Thomas

David is a chartered accountant and an economist. He was appointed a specialist panel member at the Competition and Markets Authority in 2017 and in 2018 a member of

competition and enforcement decision committees at the Payment Systems Regulator and the Financial Conduct Authority. Since 2016 he has run his own consulting practice focusing on economics, regulation and disputes, largely in the communications sector. David was a director of competition and regulatory finance at Ofcom where he had responsibility for, among other things, price controls. After leaving Ofcom he established and led KPMG's global economics and regulation practice.

Claire Whyley

Claire Whyley is a professional researcher and policy analyst, specialising in consumer behaviour and decision-making, consumer protection and consumer-focused regulation. She currently works across a wide range of regulated and unregulated markets and brings particular expertise in relation to vulnerable and excluded consumers. Claire holds a number of non-executive roles including membership of the Competition and Markets Authority Panel; the Finance and Leasing Association Lending Code Board; the Office of Rail and Road Consumer Expert Panel; and the End User Advisory Committee of Pay.UK. She is also Deputy Chair (South) for SGN's Customer Engagement Group. Her previous posts include Senior Research Fellow at the Personal Finance Research Centre, Head of Research and Policy at the Welsh Consumer Council and Deputy Director of Policy/Head of Consumer Futures at the National Consumer Council.

Secretariat

Harriet Gamper

Harriet is a Principal in the CAA's Consumers and Markets Group, assigned to support the Panel. She is a public policy specialist, specialised in consumer and competition policy in regulated markets, with particular focus on vulnerable consumer groups. She has over ten years' experience in the sector, holds a Masters in law and economics, and has contributed to a number of academic publications. Previous roles include work on consumer credit at the Office of Fair Trading and consumer policy at the Office of Rail and Road, as well as for the Legal Services Consumer Panel. "*Consumer Theories of Harm*" of which she is joint author, was published by Hart in 2019.