

ISLE OF MAN OFFICE OF FAIR TRADING



Isle of Man Office of Fair Trading

ANNUAL REPORT

2019/20



Isle of Man
Government

Reiltys Ellan Vannin

VERSION 1.0

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FOREWORD BY THE CHAIRMAN



Brexit has continued to demand the time and resource of several members of our staff team. Whilst it has contributed significantly to our work pressure, Brexit has also added considerable impetus to our ongoing ambition and commitment to develop and improve our legislative framework. We need to make sure that our statutes are fit for purpose in the modern world and have effective reach and penalties. It remains a key aim of the OFT, and Government as a whole, to advance the Competition Bill. Several issues have delayed its introduction to the branches of Tynwald, but progress is being made, slowly but surely. The Competition Bill is an important part of ensuring compliance with the standards of the World Trade Organisation, which will become even more important post-Brexit.

On a day to day level, our work touches on lives of every Manx resident, but much of that work is unnoticed. Monitoring and enforcement of weights and measures legislation helps to ensure that you can have confidence in your purchases of everyday items such as food, fuel and drink. Our experience is that the vast majority of local traders work to ensure compliance, but sometimes things do go wrong. When they do, our enforcement action generally involves education and training and warnings; again these actions are “under the radar”. Ultimately, proportionate legal action is taken when this is justified.

Finally, I would like to thank the officers for their dedication and hard work, particularly to progress urgent legislation that was required during the Covid 19 crisis, the start of which fell within the 2019/20 reporting period.

**Martyn Perkins MHK
Chairman**

INTRODUCTION BY THE HEAD OF OFT

The OFT always strives to make the very most of its limited staffing resources and, despite ongoing pressures from Brexit and, latterly in the financial year, disruption from Covid 19, I am proud to say that we have managed to achieve those of our work targets which are fully within our control. As far as possible, we have maintained ‘business as usual’. Our Director, retired in May 2019 which led to a restructuring of our management team in conjunction with our sponsoring Department, DEFA. I assumed new responsibilities in my new role of Head of OFT and Ian Mansell now has the role of Director of OFT within his wider remit of Director of Regulation.

We were also pleased to see new additions to our Consumer Advice and Debt Counselling Section, which now brings that team back to full complement. This service is very much appreciated by our clients and customers. It will clearly be of even more value as the longer-term impact of Covid 19 affects our Island’s residents.

**John Peet
Head of OFT**

OFFICE OF FAIR TRADING BOARD

Policy within the OFT is agreed by a Board which is constituted under the Board of Consumer Affairs Act 1981 and receives much of its powers from the Consumer Protection Act 1991. The Board comprises:

- a Chairman, who shall be a member of Tynwald;
- a Vice-Chairman, who shall be a member of Tynwald; and
- three persons, not being members of Tynwald, capable of representing consumers in relation to the functions of the Board.

Members for 2019/20 were:



During 2019/20, there were 11 regular meetings of the Board and one extraordinary meeting. Costs associated with the Board were very close to the budget of £24,714, with expenditure being £25,992 for the year. Minutes of the meetings of the Board are on our website¹.

Members' attendance at Board meetings was as follows:

Name	Regular Meetings		Other Meetings		Attendance Rate
	Possible	Actual	Possible	Actual	
Mr M J Perkins MHK	11	10	1	1	92%
Mrs K Lord – Brennan MLC	11	9	1	0	82%
Mrs C Convery	11	10	1	1	92%
Mrs J Bridson	11	7	1	1	64%
Dr M Maska	11	10	1	1	92%

¹ <https://www.gov.im/about-the-government/statutory-boards/isle-of-man-office-of-fair-trading/the-board/>

FINANCIAL SUMMARY

The year-end financial position of the OFT for 2019/20 was under its allocated budget. Expenditure was under budget and income was also slightly under budget. In summary, figures were as follows:

	Budget	Actual	Difference
Gross Expenditure	£700,763	£568,827	£131,936
Budgeted Income	-£40,923	-£39,859	-£1,064
Net Expenditure	£741,686	£608,686	£133,000

OVERALL PERFORMANCE AGAINST TARGETS

	Status	Comments
CORPORATE AND FINANCIAL GOVERNANCE		
Ensure that appropriate systems are in place to manage risk within the OFT. Risk Register to be submitted for Board scrutiny quarterly.	Yellow	In place but quarterly submission not achieved due to full review of Register.
Achieve the agreed gross and net budget for each financial year.	Green	Achieved
Review all fees on the basis that service provision should be revenue-neutral. New fees to be in place by 31st March 2020.	Yellow	Other legislative priorities have taken precedence
TRADING STANDARDS (INCLUDING WEIGHTS & MEASURES)		
Monitor compliance with, and, if necessary, take proportionate enforcement action under trading standards legislation, including the administration of a number of licensing and registration regimes	Green	Achieved
Provide specialist advice on trading standards matters.	Green	Achieved
Conduct a risk assessment of the Island's businesses, with visits being made to reinforce compliance at 100% of those identified as being 'high risk'.	Yellow	One identified business was not visited due to restrictions following Covid 19
Make at least thirty visits to reinforce compliance with provisions relating to sales of cigarettes.	Green	Achieved
Continue to actively target those who knowingly trade illegally or unfairly.	Green	Achieved
Undertake at least five projects to reinforce compliance with existing provisions and/or identify gaps in trading standards law.	Green	Achieved
Maintain the Manx Standards of weights and measures.	Green	Achieved
LEGISLATION/BREXIT		
Monitor legislative developments in other jurisdictions to assess the need for change to Manx statutes in the light of the new trading position of the Isle of Man post-BREXIT to ensure that Isle of Man legislation meets international standards.	Yellow	Ongoing
Progress the Competition Bill 2019 with its First Reading in October 2019.	Yellow	Delayed – planned to be October 2020
Introduce provisions analogous to the UK's Consumer Protection from Unfair Trading Regulations 2008 by 1st January 2020.	Green	Achieved

Progress the Estate Agents (Amendment) Bill to be drafted by 1 st January 2020.		Delayed – planned to be 2021
Update the Financial Services Disputes (Definition) Order 2008 (as amended) to consolidate previous updates and create one Order by 1st August 2019.		Achieved
CONSUMER ADVICE & DEBT COUNSELLING		
Provide appropriate advice and support to consumers experiencing problems with purchases of goods or services.		Achieved
Acknowledge new enquiries and complaints within three working days of receipt.		Several cases took longer due to Covid 19 impact at end of year.
75% of consumer advice enquiries and complaints to be concluded within 14 days of receipt.		Achieved
Provide intelligence to enable trading standards to target non-compliance with trading standards legislation.		Achieved
Provide a confidential debt counselling service.		Achieved
The time between the initial contact for Debt Counselling and the first meeting to review budget to be within 10 working days in 90% of cases and within 15 working days in 100% of cases.		Achieved
Provide pre-emptive advice, information and education to assist consumers to avoid problems. Issue media releases where appropriate of significance to the wider community.		Achieved
FINANCIAL SERVICES OMBUDSMAN SCHEME		
Provide a free alternative dispute resolution service for consumers with complaints about defined financial services provided in or from the Island.		Achieved
Promote good complaint handling by the Island's finance industry so that its reputation is bolstered in the market place.		Achieved
Maintain service standards at a level consistent with membership of the Ombudsman Association in order to provide quality assurance of meeting international standards		Decision taken to cease membership of the Ombudsman Association
Acknowledge new complaints within three working days of receipt.		Achieved
Action correspondence within 20 working days.		Achieved
REGISTRATION OF MONEYLENDERS		
Acknowledge new applications within three working days of receipt.		Achieved

Continue to promote the transfer of responsibility for the registration of moneylenders to the Financial Services Authority with a view to agreeing a transfer date by 31st March 2020.		Ongoing negotiations but no concrete proposals
DISABILITY DISCRIMINATION ACT 2006 (UNTIL 1ST JANUARY 2020)		
Provide advice and assistance to persons with a view to promoting the settlement of disputes arising under Part II (Discrimination) of the Act, including inquiring into the circumstances and cause of the dispute and offering the parties to the dispute assistance with a view to bringing about a settlement.		Achieved
Acknowledge new complaints within three working days of receipt		Achieved
Action correspondence within 20 working days.		Achieved
EQUALITY ACT 2015		
Advise and assist individuals in resolving complaints that arise in regards to an alleged contravention of the Equality Act 2015 by promoting alternative dispute resolution in preference to the Tribunal or Courts.		Achieved
Acknowledge new complaints within three working days of receipt.		Achieved
Action correspondence within 20 working days.		Achieved
COMPETITION & MARKETS		
With support from Treasury accountants, analyse the data provided by Manx Gas to ensure the obligations under the 2015 Regulatory Agreement are continuing to be met.		Achieved
Monitor commercial activity on the Island and undertake competition or pricing investigations, where applicable. All investigations completed within six months of commissioning.		Achieved
Collect, review and where appropriate, publish statistical data to inform the Board, the Council of Ministers and the public. Continue to collect publish and monitor comparative pricing data for domestic heating fuel, road fuel and travel; and identify anomalies and concerns for further investigation.		Achieved

KEY	
Target Achieved	
Target Partly Achieved or Achieved Late	
Target Not Achieved or Not Achievable	
Target Cancelled or Transferred to another Agency	

OFT ACTIVITIES TRADING STANDARDS

All but one premise or business identified as being 'high risk' has been visited on at least one occasion during the year. The Covid 19 outbreak prevented the final visit being made. These included weighbridges, suppliers of domestic oil, the largest supermarkets, petrol stations, petrol can stores, shops storing fireworks and the pit lane during the major motorcycle races. Each of the premises concerned was inspected to assess compliance with the relevant legislation, for example, weights and measures legislation in the case of weighbridges and 'dangerous goods' legislation in the case of petrol stations. The purpose of 'dangerous goods' legislation is to prevent fire, explosion or personal injury. Visits to ensure adherence to pricing legislation were also undertaken at all major supermarkets.

No major problems were found at any of the 'high risk' premises or businesses concerned. Where minor matters of non-compliance were identified to the businesses, these were rectified. Contact was made with particular businesses based on the number of consumer concerns recorded against the businesses during the preceding year, the seriousness of those concerns and the relative size of the businesses. The purpose of this was to raise awareness of any specific consumer concerns appertaining to the businesses with a view to minimising the number of consumer concerns recorded against them.

Forty eight visits were undertaken to premises, including shops, supermarkets and public houses, to assess compliance with legislation making provision for sales and displays of tobacco. No major problems were found.

Twenty five licences were issued to non-resident traders who were either selling or buying goods in the Island after checks had been carried out to confirm that the traders concerned were fit and proper. Most of the licences were issued to traders selling goods at the major motorcycle events. None of the licensed traders caused any major problems. One licence has been refunded after the cancellation of this year's TT festival. There were also three licenses issued to Chapmen who offer to buy goods from consumers rather than sell to them.

A number of projects were undertaken during the year. Visits to licensed premises (with Customs & Excise), to check that illicit tobacco was not being sold, were undertaken. Separate weights and measures and pricing checks were also carried out at licensed premises by our newly qualified officer.

Work to identify packers of food stuffs on the Island was undertaken. It is intended that an inspection regime for the coming year will be developed from this list once a risk assessment exercise has been undertaken.

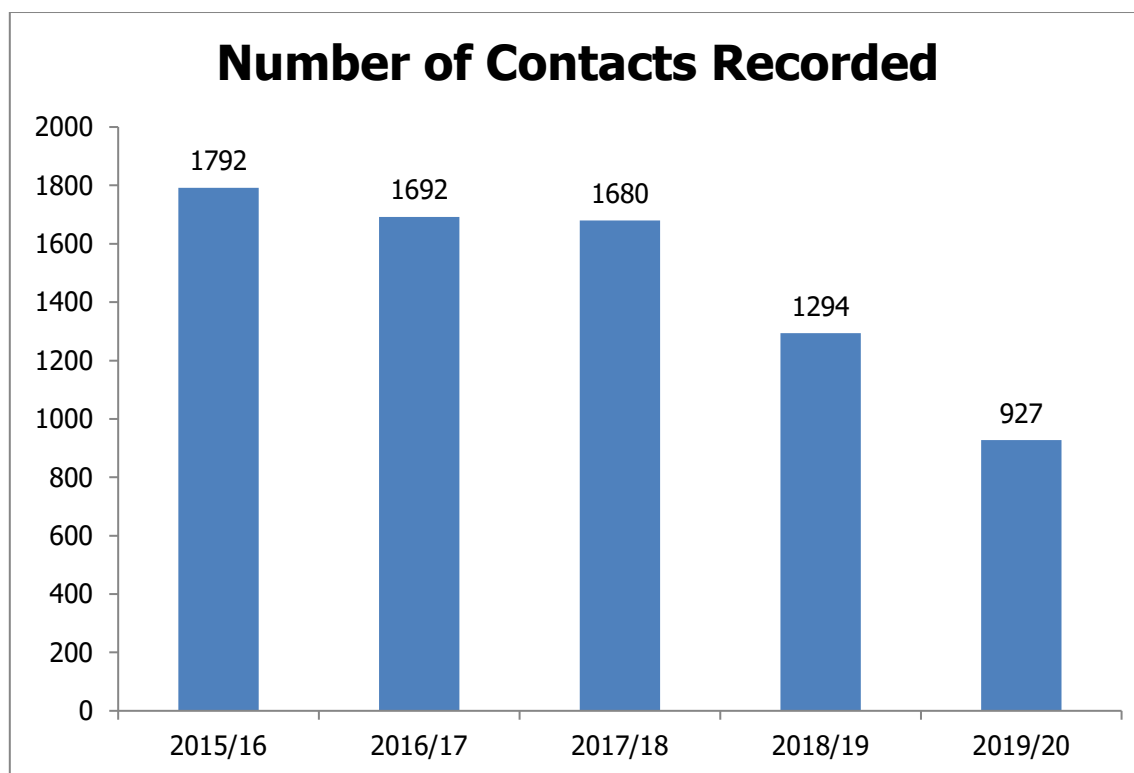
Adverts in various Island publications were examined to identify any claims that could not be substantiated. The focus of this work was initially the building industry and associated trades. Cautions were issued to a number of businesses who claimed to be members of various trade bodies when they were not. Prosecution could follow if further infringements are identified. A major project to upgrade and revise the Islands consumer protection legislation was also undertaken. This resulted in the introduction of new Consumer Protection from Unfair Trading Regulations from the 30th of October 2019. There are some 31 banned practices but importantly a general provision that a trader must now operate fairly. Deliberate omissions of pertinent information by a trader are now also outlawed. These Regulations should also provide parity with neighbouring jurisdictions which should allow us to maintain a trading relationship after Brexit.

The OFT did not initiate any criminal proceedings during 2019/20 but did work closely with other enforcement agencies on a number of high profile cases. Prosecutions are a last resort. They are not taken lightly as they must be in the public interest. Other enforcement tools such as warning letters, enforcement notices and formal cautions are often used when education fails or specific advice is not heeded.

OFT ACTIVITIES CONSUMER ADVICE AND DEBT COUNSELLING

CONSUMER ADVICE

In total 927 contacts, i.e. complaints, enquiries and reports concerning consumer issues, were recorded. Comparisons with previous years are shown in the chart below:



The table below identifies in descending order the ten subject matters of most significance based on the number of contacts recorded:

Subject Matter	Number of Contacts Recorded	%
Home maintenance, repairs & improvements	111	11.9
Second-hand Cars	107	11.5
Money Advice	86	9.2
Tenancy	60	6.4
Other personal goods, services	58	6.2
Car repairs & servicing	39	4.2
Furniture, exc nursery	27	2.9
Scam or possible scam	27	2.9
Mobile phones inc. services	25	2.6
Large white goods & major fixed appliance	21	2.2

A significant decrease in the number of contacts recorded may be explained by the loss of two very experienced staff during the previous year and subsequent under-recording. New staff have to undertake rigorous training before they can provide advice and the decision was made to

reduce promotion of the service while this was completed. Promotional works have reconvened and the service is looking to expand again in the coming year. The Covid pandemic has impacted again on our ability to attend planned events some of which had to be cancelled at the end of last year.

'Home maintenance, repairs and improvements' topped the subject matters based on the number of contacts recorded for the third consecutive year.

The information collected by the Consumer Advisors provides the Trading Standards Service with vital intelligence which enables informed decisions to be made concerning enforcement action.

We continue to raise awareness of consumer rights and concerns through media releases and will return to do presentations to community groups once current restrictions are relaxed.

DEBT COUNSELLING

While we have been training new officers in this field, we have scaled back our promotion of the debt counselling service ('the Service'). We have been increasingly proactive in recent months however the pandemic has disrupted our promotional efforts. We will encourage those living with serious debt to contact the service.

The Council of Ministers is furnished with a relevant statistical analysis of the Service, on both a quarterly and an annual basis, and this forms part of a wider economic assessment.

Figures should not by any means be interpreted as a measure of the indebtedness of residents of the Isle of Man. They merely reflect the profiles and circumstances of those people who have chosen to make use of the Service.

There may be minor differences in the way the statistics are produced as a new software package was introduced in 2018. Differences are considered insignificant.

In the context of this report, "debt" includes priority and non-priority debts.

Priority debts are those where non-payment can result in clients losing their liberty, homes, essential services or essential goods. Examples of priority debts include fines, mortgages, debts owed to utility providers and income tax.

2019 Summary:-

- 112 new clients made use of the Service.
- The cumulative debt (both secured and unsecured), i.e. that owed by all new clients, was £2,364,936.
- The average debt (both secured and unsecured) owed by each new client was £21,115.
- Credit cards (32.8%) and personal loans (19%) accounted for the two most significant proportions of the cumulative debt.

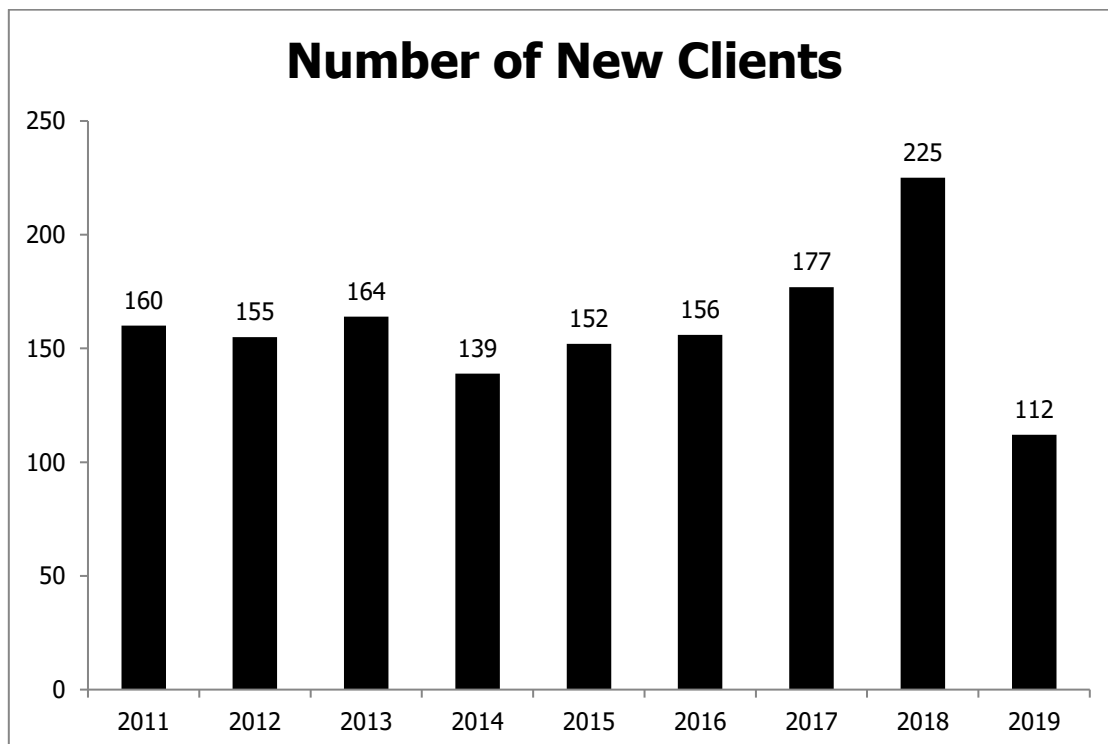
The table below shows the most significant proportion for specified categories of users of the Service.

Category	Most significant descriptor(s) where disclosed	%
Employment status	Working full time (over 30 hours)	27.7
Relationship status	Single	28.6
Housing	Private tenant	33.9
Income	Earnings	25.0
Ethnic background	British	36.6
Number of children	None	64.3
Gender	Female	52.7
Age	35 - 49 & 50 - 64	-
Location	IM2 (Douglas)	27.7
How clients discovered the Service	Friend	21.4
Debt trigger	Relationship breakdown, over commitment & long-term illness	-

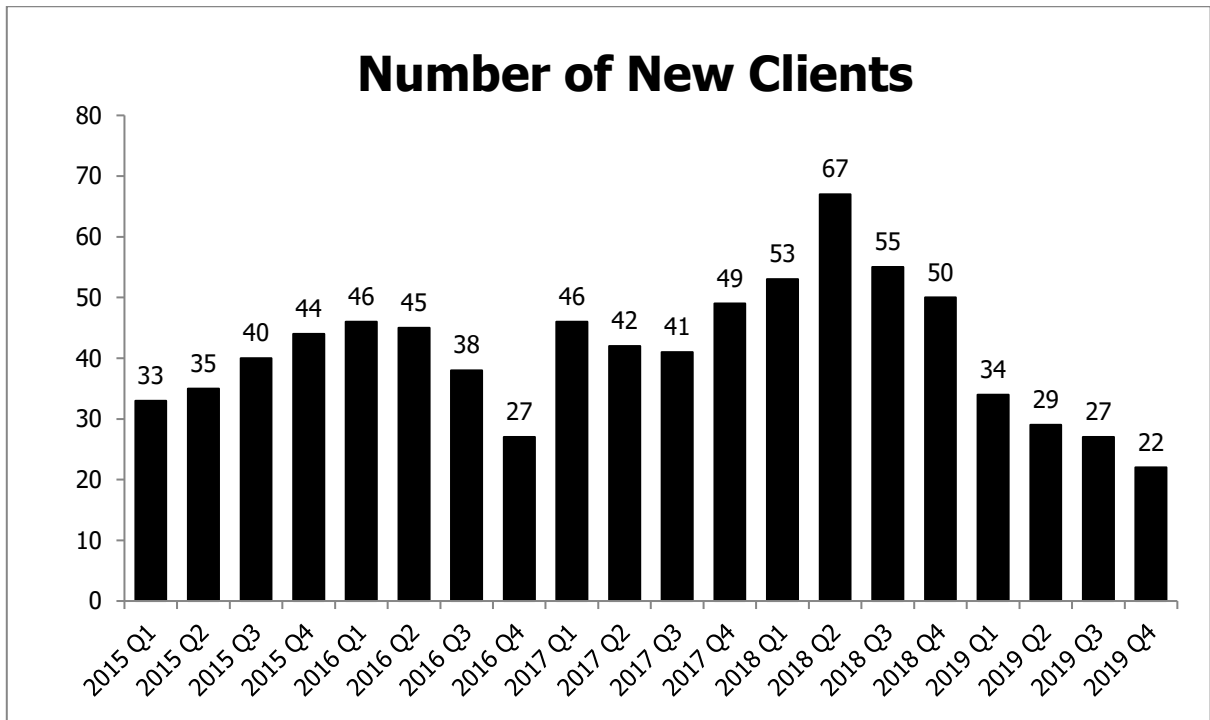
- With regard to the 'Employment status' category, those who were unfit for work made up the most significant proportion of users of the Service in the previous year. This was a significant change as the fully employed had made up the most significant proportion of new clients in each of the preceding 14 years. This year we have seen a return to the long standing trend with the fully employed being the most prevalent users.
- With regard to the 'How clients discovered the Service' category, those who discovered the Service via a friend made up the most significant proportion of users of the Service. This was the same as in the previous year.
- Again the long-term illness category was the most significant debt trigger. This continued a significant change from 2018 as poor budgeting had been the most significant debt trigger for new clients in each of the preceding 13 years.

Long-term trends:-

The chart below shows the number of users of the Service in each of the last eight years.



The chart below shows the number of users of the Service in each quarter since the beginning of the 2015 calendar year.



We continue to proactively promote the debt counselling service ('the Service') to encourage those living with serious debt to seek advice.

OFT ACTIVITIES

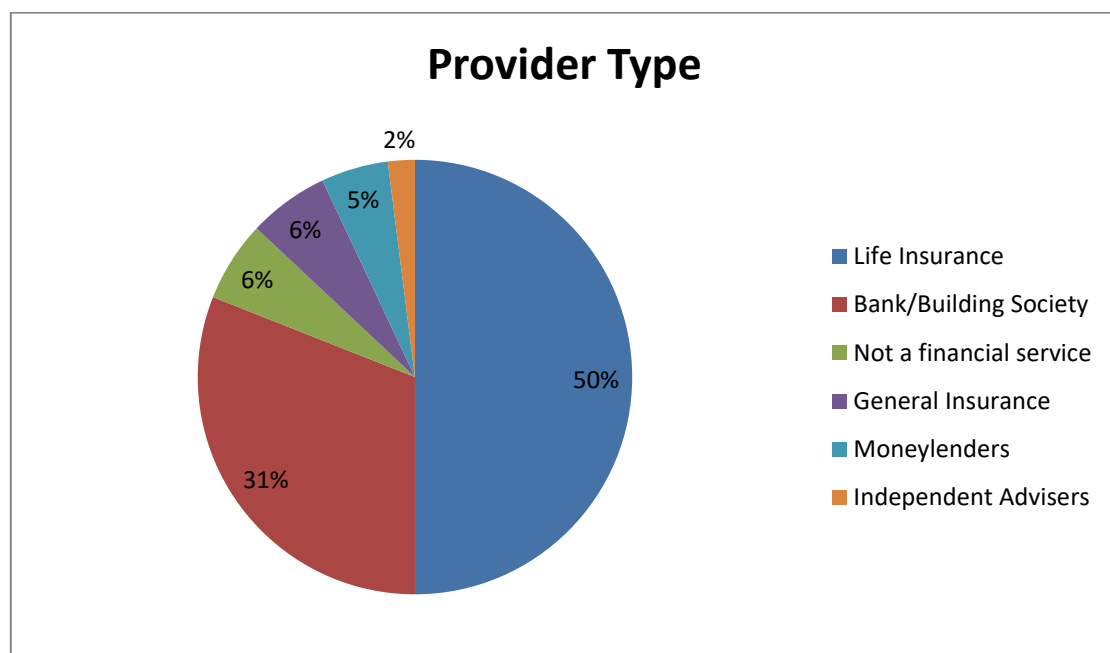
FINANCIAL SERVICES OMBUDSMAN SCHEME

During 2019/20, the OFT received a total of 469 enquiries and complaints to the Financial Services Ombudsman Scheme ('the Scheme'). 183 were formal complaints.

A 'complaint' is recorded when the Scheme receives a complaint form and the matter is investigated. In the case of an 'enquiry', a completed complaint form is not received, but some discussion may take place with the client regarding their concerns and further communication may be necessary.

We closed a total of 444 complaints and enquiries throughout the year, 95% of which were closed within six months of receipt.

The formal complaints received related to the following services:

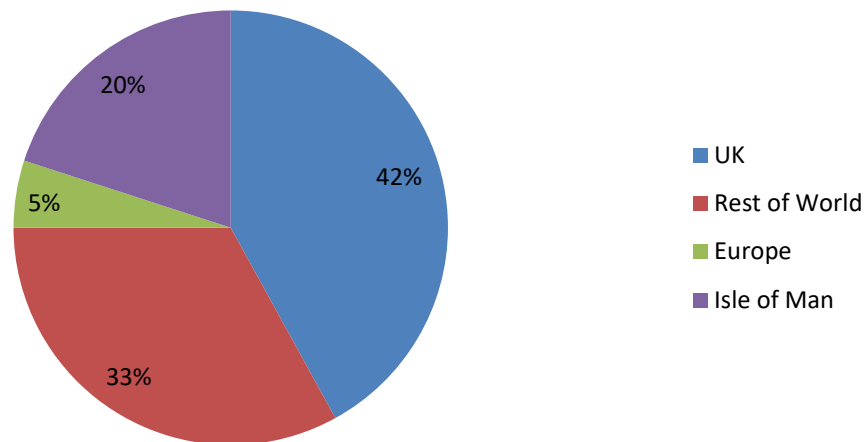


As in previous years it is the life insurance and banking sectors which attract the most numbers of complaints to the Scheme. In 2019/2020 we received 91 formal complaints against life insurance companies and 56 against island banks. These two provider types represent 81% of the total complaints received.

The remaining provider types, which include general insurance companies, moneylenders and investment advisers, together account for 19% of the complaints received. Individually these represent just a small number of the overall complaint type received.

Consideration of the country of residence of complainants gives an indication of the global nature of the financial industry on the Isle of Man. Whilst complaints from Isle of Man residents represented just 20% of the total complaints received during the 2019/2020 year, 42% of complaints received were from UK residents and 5% were received from European countries outside the UK. The spread of the remaining 33% is worldwide with complaints being received from the Middle East, as well America and Asia.

Residence of Complainants



The role of the OFT is to mediate between the parties to a financial dispute with a view to bringing about a settlement. By engaging with parties directly it is possible to achieve a timely and satisfactory resolution. When mediation does not resolve a dispute, a complaint is referred to an Adjudicator. This is a more formal process where submissions are considered and a legally binding determination is issued to both parties.

As the majority of complaints are resolved through mediation, the numbers of complaints referred to an Adjudicator are low. During 2019/2020 just two determinations were made on the following issues:-

- Life insurance provider acted on an incomplete dealing instruction by selling the holding in full which was against the wishes of the client. The complaint was upheld.
- Life insurance provider delayed giving information on a policy which the complainant alleged had caused them to incur a taxable gain on their policy. This complaint was not upheld.

A summary of each of these determinations can be found on the FSOS section of the OFT website.

OFT ACTIVITIES REGISTRATION OF MONEYLENDERS

The OFT is required under the [Moneylenders Act 1991](#) ('the Act') to maintain a register of persons carrying on a business of lending money to individuals in the Island.

The various activities which would make up 'carrying on a business' include amongst other activities the formulation of policy on the lending of money, the marketing of the lenders services, the processing of applications for loans (including the decision on whether to grant or refuse an application), the entering into of contracts for loans and the collection of repayments.

At 31st March 2019 there were a total of 36 businesses registered with the OFT as moneylenders under the Act. During 2019/20 there were three new moneylenders added to the register, each lending to individuals both on the island and elsewhere. One moneylender withdrew its registration as it is no longer providing loans resulting in a total of 38 moneylenders being registered with the OFT at 1st April 2020.

OFT ACTIVITIES DISABILITY DISCRIMINATION ACT 2006

Historically the OFT was charged by the Department of Health and Social Care under section 14(2) of the Disability Discrimination Act 2006 ('DDA') to provide advice and assistance to persons with a view to promoting the settlement of disputes arising from discrimination towards a disabled person. The DDA was repealed on 1st January 2020 when the disability provisions within the Equality Act 2017 came into force.

During the period 1st April 2019 to 31st December the OFT received six complaints whereby the OFT gave advice to the callers in regards to their rights under the DDA. All six of the complaints related to service providers being required to make reasonable adjustments to enable those with disabilities to access their services.

OFT ACTIVITIES EQUALITY ACT 2017

The Isle of Man Equality Act 2017 ('Equality Act') seeks to provide a legal framework which protects individuals from discrimination in both the workplace and the provision of goods and services.

The Equality Act was brought in over two dates. The first phase was introduced on 1st January 2019 and the second phase on 1st January 2020. Once fully implemented, it replaced several Acts of Tynwald, including the Disability Discrimination Act 2006.

Now fully implemented, the Equality Act protects all people from discrimination on the basis of possessing a 'protected characteristic'.

The protected characteristics are:

- Gender reassignment
- Marriage & Civil Partnership

- Race
- Religion
- Sex
- Sexual Orientation
- Pregnancy & Maternity
- Age
- Disability

Where a person feels they have been discriminated against in relation to the provision of goods and services, they can contact the OFT whose officers can advise what the law is so that the individual can determine if they think they may have a claim under the Equality Act. The OFT offers help and advice on equality issues arising in goods and services, public functions, associations and premises on the Isle of Man.

Ultimately a complaint can be referred to the [Employment and Equality Tribunal](#) but, if both parties agree, the OFT may conciliate in specific circumstances. Please note, however, that proceedings on a claim must be brought to the Tribunal within six months of the act to which a claim relates. This time limit is not suspended by ongoing conciliation.

During 2019/20 the OFT received seven complaints where it was claimed that there had been discrimination in regards to the following protected characteristics:

Gender Reassignment (2 complaints)
Marriage & Civil Partnership (1 complaint)
Disability from 1st January 2020 (4 complaints)

OFT ACTIVITIES COMPETITION AND MARKETS

The Gas Regulatory Agreement² was signed in 2015 between OFT, Treasury and Department of Economic Development for a minimum period of 4 years from 1st January 2015. Over this time, the OFT has, with the assistance of The Treasury, analysed management and audited accounts in detail to ensure Manx Gas is adhering to the terms of the Agreement.

There are ongoing discussions around a revised agreement between the Cabinet Office and Manx Gas. Until this has been finalised, the OFT will continue to ensure Manx Gas comply with the existing agreement.

The office continues to collect, compile and publish on the OFT website the cost of travel data for both airlines and sea travel on a monthly basis, with the publication highlighting the differences in price when buying tickets 6 months, 3 months, 6 weeks and 1 week prior to the date of departure³. Domestic heating comparisons have also been produced on a monthly basis and published on the OFT website⁴. This allows consumers to compare the costs of alternative fuels for home heating. As the impact of the corona virus takes hold, this will have an impact on travel and therefore the data that is collected in the future.

Partly as a consequence of Brexit, there has been a delay with the progression of the Competition Bill, which will ultimately replace Part 2 of the Fair Trading Act. The Government remains committed to modernising competition law in the Isle of Man in order to bring the legislation in line with international standards and the intention is to introduce the Bill into the Branches of Tywnald in 2020/21.

² <https://www.gov.im/about-the-government/statutory-boards/isle-of-man-office-of-fair-trading/competition-and-markets/gas-regulation/>

³ <https://www.gov.im/about-the-government/statutory-boards/isle-of-man-office-of-fair-trading/competition-and-markets/air-and-sea-online-travel-prices/>

⁴ <https://www.gov.im/about-the-government/statutory-boards/isle-of-man-office-of-fair-trading/competition-and-markets/domestic-heating-comparisons/>

SUMMARY OF OFT ACTIVITIES

Trading Standards	<p>Consumer Protection including:</p> <ul style="list-style-type: none"> • Weights and measures (including maintenance of the Manx Standards) • Safety of consumer goods (e.g. toys, electrical goods, furniture and furnishings) • Rogue traders • Age-restricted sales • Timeshare • Cinematograph exhibitions • Shop opening hours • Price marking • Intellectual property • Tobacco advertising • Trade Descriptions • Auctions • Unsolicited goods & services • Misleading prices • Misleading advertisements <p>Registration:</p> <ul style="list-style-type: none"> • Estate Agents • Architects • Suppliers of video recordings <p>Licensing:</p> <ul style="list-style-type: none"> • Non-resident traders • Chapmen • Dangerous goods (safe storage of fireworks on retail premises) • Dangerous goods (safe storage of petrol)
Consumer Advice & Debt Counselling	<p>Consumer Advice Debt Counselling Consumer education</p>
Ombudsman (Financial) Services	<p>Financial Services Ombudsman Scheme:</p> <ul style="list-style-type: none"> • Mediation of cases • Adjudication of cases by Adjudicators (independent of the Office) <p>Advise and assist individuals in resolving complaints concerning alleged contraventions of the Equality Act 2017</p> <p>Registration of moneylenders</p>
Competition & Markets	<p>Investigations under the Fair Trading Act 1996 into alleged anti-competitive practices and prices of major public concern</p> <p>Monitor prices, trading practices, consumer issues and consumer concerns</p> <p>Monitor compliance with the 2015 "Agreement for the Regulation of the Gas Market in the Isle of Man"</p>
Board & Office Support Services	<p>Services to the Board</p> <p>Corporate governance</p> <p>Financial management</p> <p>Business planning</p> <p>Administration</p> <p>Legislation</p>