

International Consumer Protection Enforcement Network Strategy Plan 2024-2027¹

As more consumers participate in the global market there is a strong and growing need for the International Consumer Protection and Enforcement Network (ICPEN) to support efforts in international consumer protection.

ICPEN is a membership organisation consisting of consumer protection law enforcement authorities from across the globe. ICPEN provides a forum for developing and maintaining regular contact between consumer protection agencies and focusing on consumer protection concerns. By encouraging cooperation between agencies ICPEN aims to enable its members to have a greater impact with their consumer laws and regulations.

Our mission

ICPEN's mission is to protect consumers by encouraging and facilitating practical action to prevent cross-border marketing malpractice. These actions include information sharing on market developments and regulatory best practice, as well as coordination and cooperation to tackle market problems.

Our vision

Our vision is for ICPEN to be recognised as the international body which promotes and facilitates consumer protection enforcement. This includes a growing level of cross-agency cooperation on consumer protection matters.

Our Strategy Plan

The Strategy Plan provides the framework to guide the Network's activities and projects. It provides a framework for decision making about priorities and evaluation and reporting on activities. The Strategy Plan envisages that workplans for particular projects will be developed under the overall strategic objectives, with clear indicators to monitor the progress that is being achieved.

The Strategy Plan sets out ICPEN's general strategies and objectives, as well as containing a set of actions that can be varied as required. ICPEN members regularly refer to the Strategy Plan to help guide new projects and revisit the plan in response to emerging issues and trends.

ICPEN's Memorandum of Establishment sets out the remit of the Network, which is to share information about cross-border commercial activities that affect consumer interests and to encourage international cooperation among law enforcement agencies.

¹ For review by the 2026/2027 Presidency

Our Strategic Objectives

1. To generate and share information and intelligence on consumer protection issues.
2. To share best practice in legislative and enforcement approaches to consumer protection.
3. To take action to combat cross-border breaches of consumer protection laws.
4. To identify and promote measures for effective consumer protection enforcement.
5. To promote and encourage wider participation, coordinated work, communication and cooperation with other consumer protection enforcement organisations.
6. To facilitate cross-border remedies.

Our Core Strategies

To achieve its objectives ICPEN will focus on the following three core strategies:

1. To *co-ordinate and co-operate* on consumer protection enforcement matters.
2. To *share information and intelligence* on consumer protection trends and risks.
3. To *share best practice information* about key consumer protection laws, enforcement powers and regulatory approaches to consumer protection.

We will achieve this by:

1. *Coordinating and cooperating on consumer protection enforcement matters*

- Identifying and focusing on a limited set of priority issues or thematic areas for ICPEN activities to facilitate effective enforcement.
 - This may include consumer protection issues linked to privacy in the digital economy.
- Undertaking project-based work as required on the priority issues or thematic areas to facilitate:
 - Indirect coordination: where agencies work on the same issue/sector within their jurisdiction. The combined effort forms the global effort stemming from ICPEN direction; and
 - Direct cooperation: where agencies work on or support the same case at the same time or coordinate their actions against traders whose conduct causes significant harm to consumers.
- Enhancing the effectiveness of regular Network activities, such as enhancing the use of results obtained from econsumer.gov, the Alert Mechanism and the International Internet Sweep.
- Developing a strategy to coordinate enforcement actions within ICPEN through the broader use of the Alert Mechanism and other ICPEN tools.
- Ensuring a structured stakeholder's dialogue with consumer and business associations, private enterprises, academics and non-governmental organisations,

where appropriate and on a case-by-case basis, to increase the impact of ICPEN's work and where possible, bring insight from the relevant sectors to anticipate and predict future trends that can potentially cause harm to consumers at international scale.

- Non-governmental involvement should not negatively impact the willingness of any ICPEN Member to engage in a certain project or event, e.g., because the information shared is confidential.
- Cooperating with (governmental) regional, agency-to-agency and other international networks on intelligence, best practices and enforcement in accordance with the applicable rules on sharing of confidential information.
- Cooperating with and developing common projects with other intergovernmental organizations to increase the impact and reach of ICPEN's global enforcement efforts.
- Developing common projects with non-governmental organizations when possible, recognizing that certain limits, including legislative frameworks, may affect certain members' ability to share information or otherwise coordinate with nongovernmental organizations.
- Seeking further collaboration with other international organizations to address consumer protection issues.
- Encouraging, facilitating, and supporting the public acknowledgment of joint enforcement actions and outreach initiatives by ICPEN members and/or observers. This will involve highlighting successful collaborative efforts, including the ICPEN Internet Sweep.

2. Sharing information and intelligence on consumer protection trends and risks

- Continuing to exchange information and intelligence on cross-border issues and cases by effectively using the capabilities of the website and other, secure technological tools. Members will undertake to exchange as much information as possible within the Network subject to any disclosure restrictions and data protection rules.
- Members reporting current consumer protection risks/matters on a regular basis, such as current or emerging deceptive conduct, including online scams, using, e.g., the Alert Mechanism and other instruments on the ICPEN member portal, as well as reviewing econsumer.gov data. This will include, where appropriate, identification of matters that require a cross-border enforcement or regulatory response.
- Members reporting intelligence on major market trends, emerging issues and consumer developments through the Annual Intelligence Report and involvement in working groups, steering groups and other initiatives and projects.
- Enhancing the effectiveness of regular Network activities, such as effectively capturing and reporting the intelligence from econsumer.gov, the Alert Mechanism,

and the Internet Sweep; developing discussion papers to enhance conference sessions; and utilising webinars and the members' portal to share information on consumer trends and risks.

- Continue integrating new ICPEN members as “Level 1” econsumer.gov members to ensure efficient and effective sharing of consumer complaint information and promotion of ICPEN and econsumer.gov resources (e.g., news, alerts, and complaint trends)¹.
- Fully implementing the intelligence cycle according to the Intelligence Steering Group workflow by processing and standardising relevant information from various sources, analysing the results and advising on possible measures.

3. Sharing best practice information about key consumer protection laws, enforcement powers, and regulatory approaches to consumer protection

- Continuing to deliver at least one Best Practices Workshop event each year (in person or virtually) for all ICPEN Member and non-member consumer protection enforcement agencies, directed at operational staff.
- Undertaking project-based work to develop Network best practice material (e.g., reports, guidelines, survey results) on key consumer protection enforcement and compliance methodologies, approaches, including technological approaches, or laws. The aim is to produce at least one such item each year.
- Enhancing the effectiveness of regular Network activities, such as continually improving the Best Practices Training, sharing the approaches utilised by members for Fraud Prevention Month and acknowledging success stories through the Consumer Education Awards.
- Continually building on a library of reference information within the intranet site for members.
- Recognizing that stronger domestic consumer protection authorities strengthen the protection of consumers, cross-border enforcement cooperation, and the Network, undertaking project-based work on agency effectiveness, including mentoring and developing the capacity of members.
- Supporting members in their efforts to improve their enforcement capabilities, such as through a project on agency effectiveness and/or specific coordination role.
- Supporting the sharing of best practices on technological approaches to consumer protection enforcement to improve the enforcement capabilities of members.
- Highlighting education and advocacy activities, including by promoting joint campaigns, educational programs, and awareness-raising activities aimed at

¹ Noting that members would need to execute confidentiality and data security documents, and complete the survey on enforcement authority, to access econsumer.gov and cross-border individual complaint data as “Level 2” members. See Econsumer.gov - Memorandum of Understanding (April 2001)

informing the public about potential risks and providing business guidance on consumer protection, in particular through the Fraud Prevention Month and the Consumer Education Awards.

- Supporting public acknowledgment of work undertaken or facilitated by ICPEN.

Our organisational strategies and delivery mechanisms

The most important supporting strategy for ICPEN's objectives is active member participation, contribution and continuous involvement. To that end, ICPEN encourages members to rotate positions regularly (when practical, and where there exist other candidates, every three to six years) such as the Secretariat, Steering Group leads, the ICPEN Webmaster, the Internet Sweep Coordinator, the Fraud Prevention Month Coordinator, the Best Practices Workshop Coordinator and Consumer Education Awards Coordinator in order to achieve larger member participation. To that end and given the growth of the Network, and to improve the functioning of the Network, ICPEN also strongly encourages evaluation of the Network effectiveness and functioning, including the adequacy of the Network *Memorandum of Understanding* and the scope and feasibility of the different roles within the Network. This can be done, for example, by establishing a temporary working group on ICPEN governance and supporting active member engagement, including through agency effectiveness efforts, e.g., by the Agency Effectiveness Coordinator under the Best Practices Steering Group.

To support ICPEN's core strategies, the following organisational strategies and delivery mechanisms will be undertaken:

Presidency and Advisory Group

The Presidency based on advice from the Advisory Group (AG) will:

- ensure delivery of the Strategy Plan, review selected projects and activities and update members on progress in a transparent and open way;
- use the Strategy Plan to look ahead and consider new proposals for projects or other work; and
- utilise intelligence to identify and determine the priority issue/s or thematic area/s of ICPEN focus each year, or as required to capture new or emerging issues of importance.

Each new Presidency will circulate and present its proposals for action – the Programme of Work - to the AG for consideration against the Strategy Plan and the Intelligence Report, and provide it to members, partners and observers immediately before taking up its task.

The Presidency, in delivering its annual Programme of Work, will have regard for the Annual ICPEN Cycle and any other issues likely to impact the Annual ICPEN Cycle.

Project and Working Groups

New and continuing projects will be established or continued each year, along with ongoing project or working groups according to the following guidelines:

- Proposals for new groups will be based on intelligence or identified gaps in knowledge-sharing;
- New projects will include a reference articulating how they fit in the Strategy Plan and, if they are outside the scope of the plan, explain why they will be prioritized;
- The outcomes of ICPEN project or working groups should, where possible, be of overall benefit to ICPEN members;
- Prior to the establishment of a project or working group, concrete deliverables and a timeframe to reach this goal will be identified;
- Each group will be assigned to one Steering Group for oversight; and
- The Steering Group leads, in cooperation with the project leads, the FPM, Sweep and Consumer Education Awards coordinators, will cooperate to minimize an overload of work among participants during peak periods.

All projects and activities require a work plan, which will be considered by the Presidency based on advice of the AG and approved by the membership, which will include an evaluation mechanism.

The Enforcement, Intelligence and Best Practices Steering Groups, acting according to the Steering Group Annex to the Strategy Plan 2010-2013, are responsible for reviewing the project working group composition, workplans, progress and direction of their related project groups and to ensure the effective implementation of their work plans against the Annual ICPEN Cycle.

The Steering Group leads will coordinate among the different project and structural working groups in order to balance the workload for the membership throughout the Annual ICPEN Cycle.

The **Presidency** based on advice of the **AG**:

- can provide guidance and direction to improve or provide focus to an activity or project; and
- has the ability to recommend the closure of activities or projects for reasons including that the activity has been assessed as being completed, has met its objectives or is no longer progressing as expected by meeting milestones.

Events – physical and virtual

The Presidency, based on advice from the AG, will take the Strategy Plan and priority issue/s, thematic areas or project groups into account when planning event agendas, including but not limited to: Annual Conference/s, the Best Practices Workshop (BPW), and the High-Level Meeting to aid preparation for contribution at events.

These meetings, like other events, may be held in face-to-face or digital format. Annotated agendas, presentation slides and papers, such as discussion papers, are to be provided before the event where possible.

Physical meetings will be supplemented with virtual events, to ensure the engagement of the ICPEN membership throughout the year.

Communications

The ICPEN website, including members' portal (the ICPEN extranet), plays a central role in the Network Communications.

The Network will review and consider updating the *ICPEN Network Communication Principles* as outlined in the document entitled '*A Strategy for ICPEN Communication*' (December 2016), taking into account that internal communication is a priority, but it is worth considering wider external communication as well.

The updated *ICPEN Network Communication Principles* and external Network communications will ensure that ICPEN communications are as inclusive, effective and confidential as necessary.

ICPEN will encourage, facilitate and support the public acknowledgment of joint enforcement actions and outreach initiatives by its members and observers. It will also encourage, facilitate and support communicating the value of the Network and its activities to encourage new members to join and existing members to be more involved.

Keeping the Plan up to date

The Plan is subject to review and update by the ICPEN membership as required ensuring it continues to meet the priorities and needs of the Network as a whole.

Membership and growth

Members will continue to promote the benefits of ICPEN and encourage wider participation and cooperation with other consumer protection enforcement organisations taking into account the *Memorandum of Understanding* and the *Guidelines for extended ICPEN Participation and Growth* document.

The Annual ICPEN Cycle

