



CONSUMER  
PROTECTION BC



# Business Plan

2024 - 2026

Our offices are located on the traditional lands of the WSÁNEĆ and Lək̓ʷəŋən (Lekwungen) Peoples, the hə́h̓qəmi̓h̓əm̓ (Hun'qumy'i'num), Sḵw̓x̓w̓ú7mesh (Squamish) and Secwepemctsin (Shuswap)-speaking Peoples. Our work extends across the homelands of the Indigenous Peoples within what we now call British Columbia. We honour the many territorial keepers of the lands and waters where we work, both past and present.

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## Message from the Board Chair and CEO

On behalf of Consumer Protection BC's Board of Directors and employees, we are pleased to present our 2024 - 2026 Business Plan. This Plan illustrates our strategic focus over the next three years; is developed through a collaborative process with our employees, Leadership Team and Board of Directors; and is informed by the realities of our ever-changing British Columbian marketplace.

Our first strategic area of focus, *consumer education*, is in the third year of a targeted marketing campaign, proactively arming BC consumers with tools and information regarding debt collection practices and payday loans. Our next strategic focus area, *business education*, works to increase the awareness of licensed and regulated businesses about their contractual obligations and will share new educational support resources with all licensed travel sector suppliers. Our third strategic areas of focus, *contract and agreement compliance*, is designed to safeguard the rights of consumers entering into contractual agreements with businesses by ensuring contracts are compliant with legislation; consumers are aware of their rights; and that effective and modern consumer protection legislation is supported. Our fourth strategic area of focus, *enhancement and standardization of administrative and operational processes*, continues to apply a quality management approach to ensure our organizational processes are sound, modern and allow for maximum efficiencies across our business systems and departments. Finally, our fifth area of strategic focus, the development of an *education grant program*, will broaden our educational reach across the province and to the benefit of both consumers and businesses.

Our 2024 - 2026 Business Plan was prepared by the CEO, under the strategic direction of the Board of Directors and in accordance with the *Business Practices and Consumer Protection Authority Act*. We have designed the Plan to align with the BC Government's expectations, as outlined within the Authority's Administrative Agreement and as confirmed through quarterly liaison meetings with personnel from the Ministry of Public Safety and Solicitor General. The Board of Directors remains accountable for the Plan's contents and is responsible for the validity and reliability of included information. All significant assumptions, policy decisions, events and principal risks, as of November 24, 2023, have been considered in preparing the Business Plan. The strategic and operational outcomes and measures presented in the Plan focus on aspects that are most critical to our mandate and represent the highest-priority work in ensuring we remain a responsive, value-added regulator.

We look forward to continuing to provide value to BC's consumer and business community, and working in a consultative manner with the BC Government.

Respectfully,



Rod Dewar  
Board Chair, Consumer Protection BC



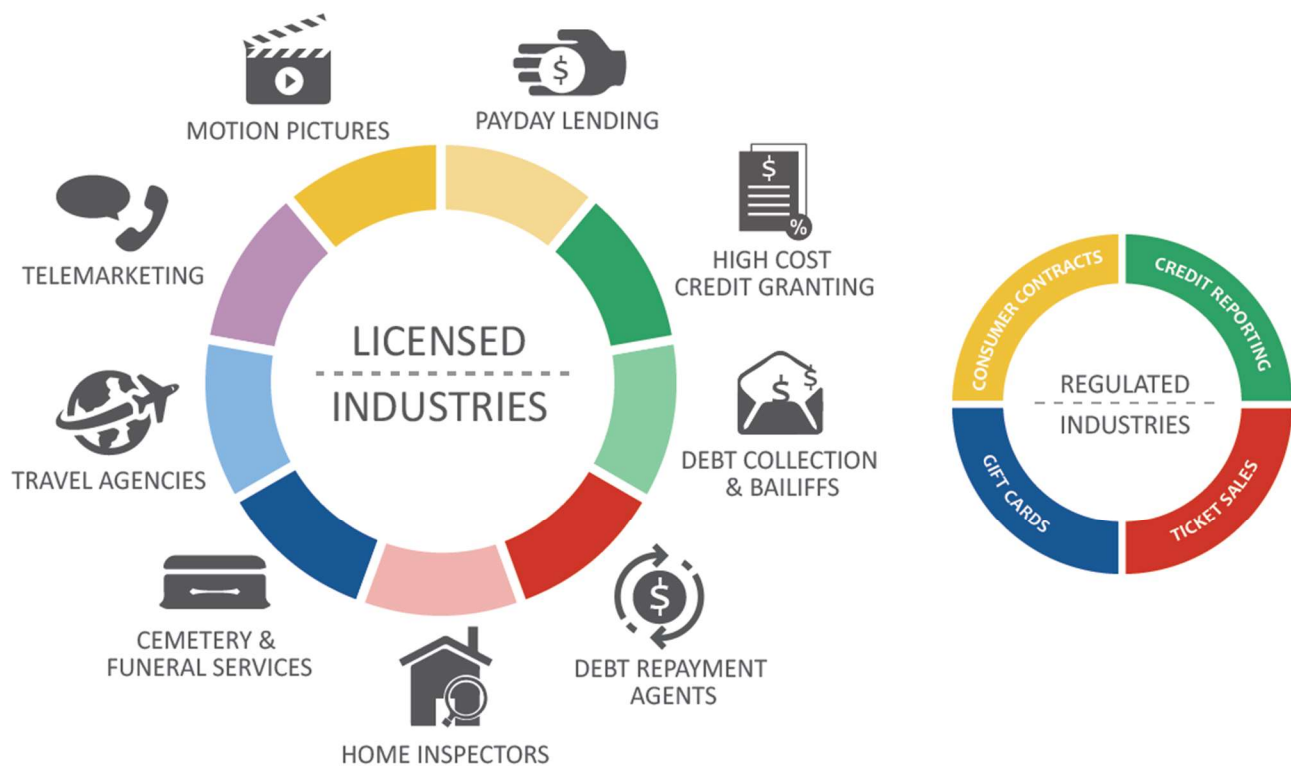
Rob Gialloreto  
President & CEO, Consumer Protection BC

## Corporate overview

### Who we are

Consumer Protection BC is a team of dedicated and passionate individuals based in Victoria and Burnaby, BC, responsible for regulating various sectors and consumer transactions in the province of British Columbia.

Our purpose is to license and inspect regulated businesses, respond to consumer inquiries, investigate and take action for consumer protection law violations, classify motion pictures and provide information and referrals to the public.



In the public interest and through the authority delegated by the Province of British Columbia, Consumer Protection BC is responsible for administering four Acts:

- *Business Practices and Consumer Protection Act* [SBC 2004]
- *Cremation, Interment and Funeral Services Act* [SBC 2004]
- *Motion Picture Act* [RSBC 1996]
- *Ticket Sales Act* [SBC 2019]

Consumer Protection BC is a cost-recovery organization. Our revenue is primarily generated through licensing fees. This ensures licensed businesses and individuals fund annual regulatory and general consumer protection costs, as required by legislation.

## Organizational excellence

### Our values

Our corporate values<sup>1</sup> are developed and defined by our employees and cascade through our operational and governance systems.

#### *Trust*

We consistently come from a belief that we have the best interests of the organization and each other at the heart of everything that we do.

#### *Accountability*

We hold ourselves in ownership of, and take responsibility for, everything that we do.

#### *Integrity*

We behave in an honest and transparent way with each other.

#### *Excellence*

We are passionate, enthusiastic professionals continually seeking to deliver with a high level of quality.

#### *Impact*

We consistently strive to make a positive difference in the lives of British Columbians.

### Values statement

We believe in accountability to ourselves and to each other, in the investment and maintenance of integrity, and in the pursuit of excellence in the delivery of services that ultimately make a positive difference in the lives of British Columbians.

### Our commitment to inclusion, diversity, equity and accessibility

Our business activities, regulatory work, education efforts, interactions and corporate culture are guided by the tenets of diversity, equity, inclusion and accessibility. In delivering on the areas of strategic focus in this Business Plan, we strive to uphold these important principles. In addition, given our authority to regulate BC's consumer protection laws, we acknowledge the responsibility we have to all British Columbians, and we honour the impact we can have to effect change within the province.

### What we do

We deliver consumer protection services throughout British Columbia by:

- Educating consumers and businesses about their rights and responsibilities.
- Responding to inquiries and complaints from BC consumers and businesses.
- Licensing specific businesses and individuals.
- Inspecting licensed and regulated businesses and individuals to ensure they are following BC's consumer protection laws.

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<sup>1</sup> Our values are currently being redeveloped. Once complete, the new corporate values will be available on [the Careers page](#) of our website.

- Investigating violations of consumer protection laws, then, if warranted, resolving through progressive enforcement (such as issuing warning letters, licensing actions, administrative monetary penalties and compliance orders).
- Classifying all motion pictures exhibited in British Columbia.
- Approving all adult video products sold, rented or exhibited to consumers.
- Providing recommendations to government and supporting government's policymaking process regarding enhancements to consumer protection laws.

For more information about us, visit our website at [www.consumerprotectionbc.ca](http://www.consumerprotectionbc.ca).

## How we protect consumers

Here is how we help and protect consumers:



## How we regulate businesses

Here is how we help ensure regulated businesses operate within the law:





## 2024 - 2026 Business Plan

The 2024 - 2026 Business Plan describes our strategic priorities for the next three years. We live the Plan internally with our employees and Board of Directors. We share the Plan with the government, licensed and regulated sectors and the public as a roadmap of how we fulfill our purpose within a dynamic regulatory ecosystem and constantly changing marketplace.

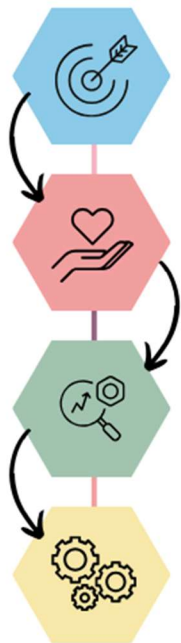
In developing the areas of strategic focus within this 2024 - 2026 Business Plan, we used current data, assumptions and forecasting information to determine where our efforts will have the greatest impact. Our corporate values are applied in the development and delivery of our Business Plan: they are infused into our daily operating practices and serve as a guide for how we choose to act and behave as we go about our work. The Plan also summarizes our areas of principal risk, which are identified by the Board of Directors and mitigated on an ongoing basis to ensure risk exposure is minimized.

As the world continues to deal with climate change events and significant social and economic upheavals, British Columbians, and the many businesses that serve them, continue to face unprecedented impacts. To ensure consumers understand their rights under the law, and businesses understand their obligations, we have a duty to anticipate and respond to these challenges and make sure that protections are in place for consumers and that comprehensive tools and resources are in place for businesses. This plan recognizes a more significant step in this direction.

While we follow the 2024 - 2026 Business Plan as a roadmap to positive strategic outcomes, we continue to respond to evolving marketplace challenges, address emerging consumer risks and apply timely data analytics in agile and innovative ways. We consistently direct our regulatory resources to the most critical areas of consumer harm and evolve or create new strategic actions in the event material changes in the marketplace should occur, when appropriate and warranted.

### Strategic framework

When our overall purpose as a regulator is combined with our values and areas of strategic focus, a framework is established to guide our success. This strategic framework allows our Board of Directors to provide oversight of our strategic directions and key priorities and guides employees in developing operational deliverables to meet the needs of key interest holders and maximize operational productivity.



#### OUR PURPOSE

- To license and inspect regulated businesses, respond to consumer inquiries, investigate and take action for violations of consumer protection laws, classify motion pictures and provide information and referrals to the public.

#### OUR VALUES

- We believe in accountability to ourselves and to each other, in the investment and maintenance of integrity, and in the pursuit of excellence in the delivery of services that ultimately make a positive difference in the lives of British Columbians.

#### OUR AREAS OF STRATEGIC FOCUS (2024-2026)

- Consumer education
- Business education
- Compliance with contracts and agreements
- Enhancement & standardization of administrative and operational processes
- Education grant program

#### CORE OPERATIONAL DELIVERABLES (2024-2026)

- Our core work & operational priorities

### Alignment with government priorities

Established in 2004 through the *Business Practices and Consumer Protection Authority Act*, Consumer Protection BC is the agency responsible for administering several BC consumer protection laws and supporting regulations. Consumer Protection BC is accountable to the provincial government through an Administrative Agreement with the Ministry of Public Safety and Solicitor General – this Agreement outlines how the province wishes the Authority to maintain and enhance consumer protection, be responsive to public needs and promote competitiveness in the BC economy.

Alignment with government priorities is confirmed through:

- Quarterly Leadership Team meetings with representatives from the Ministry of Public Safety and Solicitor General and meetings with any other Ministries, where appropriate;
- Annual Board of Director engagement with the Executive Director, Corporate Policy and Planning Office and with the Minister, where appropriate;
- Publication of the Business Plan which outlines the core operational deliverables and the areas of strategic focus for the next three years; and
- Publication of the Annual Report which describes how the Authority met government expectations and other strategic and operational outcomes from the preceding year.

### Situational analysis

We operate in a dynamic ecosystem which is defined by rapid changes in business and consumer behaviours when marketplace conditions change. To be a responsive, data-driven and value-added

regulator, we must continually analyze this ecosystem, including internal, marketplace and public policy factors. The following tools ensure effective situational scanning:

- Consumer and supplier data gathering and analysis;
- Bi-weekly supervisor meetings, monthly Leadership Team meetings and operational team meetings;
- Quarterly strategic conversations with the Board of Directors;
- Manager of Industry Relations & Projects business meetings, engagements and data collection;
- Quarterly liaison meetings with the Ministry of Public Safety and Solicitor General;
- Media and social channel monitoring;
- Public domain research;
- Information-sharing agreements (such as with the Competition Bureau and the Canadian Radio-television and Telecommunications Commission); and
- Meetings with other Authorities (such as the Vehicle Sales Authority of British Columbia, BC Ferries, Technical Safety BC and Land Title and Survey Authority of British Columbia).

The following summarizes the most salient factors of interest:

- **Authority (internal)**
  - Continued commitment to being a data-driven organization by building internal data literacy and by enhancing our data collection, analysis and management to improve regulatory, strategic and operational outcomes.
  - IRIS (case management system) and MyAccount re-platforming to: a) re-modernize internal case management; and b) complete the migration to offer a fully online, sector-wide licence application/renewal system.
  - Consumer Advancement Fund and Consumer Financial Education Fund expenditure planning to support enhanced consumer and supplier education.
  - Emerging focus on inclusion, diversity, equity and accessibility, especially in the area of Indigenous relations and people with disabilities.
- **Marketplace (external)**
  - Business models are rapidly changing. Not only are more businesses and consumers transacting online, but many businesses are also changing policies and practices (for example, refund policies and deceptive marketing). While this creates increased risk for all consumers, some demographics are particularly impacted due to transactional power imbalances.
  - Rapid emergence of artificial intelligence (generative and integrative) has created uncertainty and rapidly changing information schemes which may increase risk to BC consumers and businesses.

- **Public policy (internal and external)**

- Monitor and evolve operational planning related to the outcomes of the BC Government’s consumer protection modernization project, which may modify existing legislation/regulations or create new laws related to consumer protection gaps.
- Ensure compliance with the *Accessible British Columbia Act* (required by September 2024) to include an accessibility plan, accessibility committee and a formal process for accessibility feedback.
- Monitor the recent federal announcement regarding high-interest lending and support any downstream consideration of changes to BC’s lending laws.

### Areas of Strategic Focus

Each area of strategic focus for 2024 - 2026 includes an objective linked to a strategic rationale. Our confirmed actions are documented in this Plan and other strategic actions will emerge as we respond to marketplace priorities throughout the planning cycle. Each area of focus includes desired strategic outcomes, and results will be included in the subsequent Annual Report.

Focus area 1: Consumer education	
<b>Strategic objective</b>	Position educational activities and in-mandate campaigns related to high-priority, emerging issues as an efficient and effective regulatory tool to foster consumer resilience in the marketplace.
<b>Strategic rationale</b>	<p>The following assumptions support the strategic value of this objective and offer evidence that the application of corporate resources and capabilities to this area of focus will result in positive strategic outcomes:</p> <ul style="list-style-type: none"> <li>• Education protects consumers by building pre-transaction resilience and offering post-transaction solutions through plain language communications related to consumer protection law obligations.</li> <li>• There is still a social stigma around debt and financial struggles, leading debtors and borrowers to feel ashamed about needing or asking for help. It is still difficult for consumers to speak openly about finances.</li> <li>• Debt remains a pervasive issue for British Columbians. Consumer Protection BC-conducted surveys show that concern about debt is rising in the province. Feelings of concern and stress around debt rose 17% from 2021 to 2023 while feelings of confidence about managing debt and debt issues decreased by 12%.</li> <li>• The proportion of Canadians who use online lenders or payday loans to manage daily expenses more than tripled from August 2020 to September 2022 (from 1.42% to 4.52%).</li> <li>• Increasingly, consumers are entering into online transactions, including financial. According to 2022 <a href="#">Statistics Canada</a> research, British Columbia has the highest internet usage (97% of the population). Many BC consumers may</li> </ul>

	<p>not fully understand the online lending products they encounter or related obligations.</p> <ul style="list-style-type: none"> <li>• Costs for educational activities can be funded through operations, the Consumer Advancement Fund and, in certain instances, the Consumer Financial Education Fund.</li> <li>• Internal data related to consumer issues will guide the need, and required tactics, for relevant and timely educational activities.</li> <li>• Strong social engagement and the positioning of Consumer Protection BC as a source of trusted information allows for the effective deployment of educational activities.</li> </ul>
<b>Strategic actions</b>	<p>Strategic actions will be identified and validated through ongoing marketplace assessments, the gathering and analysis of data and outcomes of strategic actions. Based on the current situation, confirmed strategic actions include:</p> <ul style="list-style-type: none"> <li>• Deliver year three of a targeted campaign in 2024 to: <ul style="list-style-type: none"> <li>○ Inform and proactively offer tools to BC consumers who are being contacted by debt collectors; and</li> <li>○ Educate and offer just-in-time knowledge to BC borrowers who are considering using, or who have used, a payday loan.</li> </ul> </li> </ul>
<b>Strategic outcome</b>	<p>Achievement of the strategic outcome will be measured by identifying performance measures for each educational campaign or activity. Educational efforts will be based on high-priority emerging issues which will be supported by data and provide for a qualitative assessment of marketplace risk before and after the educational effort.</p> <p><b>Desired strategic outcome:</b></p> <ul style="list-style-type: none"> <li>• By enhancing knowledge and expanding accessibility to Consumer Protection BC's support resources, BC consumers will make more informed decisions before securing payday loans or responding to debt collectors.</li> </ul>

<b>Focus area 2: Business education</b>	
<b>Strategic objective</b>	Position innovative educational tools, resources or activities related to emerging high-impact and/or low-awareness issues as a streamlined and powerful regulatory approach to foster business compliance in the marketplace.
<b>Strategic rationale</b>	<p>The following assumptions support the strategic value of this objective and offer evidence that the application of corporate resources and capabilities to this area of focus will result in positive strategic outcomes:</p> <ul style="list-style-type: none"> <li>• Results of the travel sector self-assessment pilot project in 2023 supports broadening the questionnaire to the full travel sector and may warrant future inclusion as a compliance tool for other licensed or regulated sectors.</li> <li>• Educational tools and resources provided to businesses foster a culture of compliance by establishing a clear and concise understanding of compliance</li> </ul>

	<p>requirements which can be reinforced over time as the sector and individual businesses grow and evolve.</p> <ul style="list-style-type: none"> <li>• Educational tools and resources, once established and validated, may be redistributed to business sectors when new compliance data becomes available or when changes are made to legislation, regulations or our policies or processes.</li> <li>• Business education offers opportunities to engage with licensed and regulated businesses in a collaborative and solution-focused environment, fostering learning and voluntary compliance.</li> <li>• Information collected during educational planning and implementation related to consumer issues and business non-compliance will enhance our data and foster more effective strategic and operational decisions.</li> <li>• Under our Administrative Agreement with the BC Government, we are obligated to educate businesses. The Provincial Government supports education as a regulatory tool, as recently shown by their inclusion of the Consumer Financial Education Fund as a licensed-business funded compliance resource for high-cost credit grantors and payday lenders.</li> </ul>
<p><b>Strategic actions</b></p>	<p>Strategic actions will be identified and validated through ongoing marketplace assessments, the gathering and analysis of data and the outcomes of previous strategic actions. Based on the current situation, confirmed strategic actions include:</p> <ul style="list-style-type: none"> <li>• Enhance website content to make educational information available to regulated businesses about their contractual obligations within our oversight (to be completed in 2024).</li> <li>• Building on pilot project work completed in 2023, expand self-assessment surveys as educational support resources for all licenced travel sector businesses (to be completed in 2024).</li> <li>• Based on past learning, data analysis, industry engagement and marketplace assessments, review educational needs of licensed and regulated sectors (to be completed in 2024).</li> <li>• Based on the 2024 learnings regarding our licensed sectors' educational needs, build or adjust educational tools, resources and approaches, as needed (to be completed in 2025).</li> </ul>
<p><b>Strategic outcome</b></p>	<p>Achievement of the strategic outcome will be measured by identifying performance measures for each educational activity. Educational efforts will be based on high-priority emerging issues which will be supported by data and provide for an assessment before and after the educational effort.</p> <p><b>Desired strategic outcome:</b></p> <ul style="list-style-type: none"> <li>• By creating self-assessment questionnaires and new educational tools and resources, businesses gain a clearer understanding of their statutory</li> </ul>

	obligations. This fosters voluntary compliance, ultimately reducing the necessity for the application of progressive enforcement tools.
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<b>Focus area 3: Contract and agreement compliance</b>	
<b>Strategic objective</b>	Enhance consumer protection by ensuring contract and agreement compliance, promoting consumer rights awareness and supporting emerging legislation.
<b>Strategic rationale</b>	<p>The following assumptions support the strategic value of this objective and offer evidence that the application of corporate resources and capabilities to this area of focus will result in positive strategic outcomes:</p> <ul style="list-style-type: none"> <li>• Annually, Consumer Protection BC receives an average of 1,000 in-mandate consumer inquiries related to contracts (in 2022, in-mandate contract inquiries made up 23% of the 3,223 received in-mandate inquires; in 2021, in-mandate contract inquiries made up 22% of the 4,336 total in-mandate inquiries).</li> <li>• In 2022, Consumer Protection BC secured \$586,000 in restitution for consumers (\$506,000 in 2021). Contract-related complaint files made up more than 95% of these amounts.</li> <li>• Inspections of continuing services contracts used by fitness clubs in 2021 resulted in a finding that 100% of contracts were non-compliant. Similar work done in 2022, related to businesses using future performance and distance sales contracts, found a 96% rate of non-compliance for both types of contracts. When examined individually, the rate of non-compliance for future performance contract requirements was 54%, whereas the non-compliance rate for distance sales contracts was 97%. The lower rate of non-compliance for future performance contract requirements is attributed to previous inspection work done with businesses in this area (no similar past compliance work has been done with businesses related to distance sales contracts).</li> <li>• The BC Government’s consumer protection modernization project may result in an enhanced legislative framework for consumer contracts.</li> <li>• Contract non-compliance continues to be a marketplace issue, as shown by internal data analysis and as exacerbated through changes in consumer spending behaviours (particularly online (distance) sales and e-commerce). In developing future strategic focuses, considerations will be made related to distance sales contracts and merchant refund obligations (including credit card and other payment platforms), payday lending and high-cost credit agreements.</li> <li>• Specific to credit card issuer obligations to provide refunds (chargebacks), the <i>Business Practices and Consumer Protection Act</i> includes the unlimited period in which credit card issuers are obliged to refund consumers who have cancelled distance sales contracts because of non-delivery of goods/services.</li> </ul>

	We have frequently observed credit card issuers wrongly deny consumers chargeback rights due to limitations within credit card agreements.
<b>Strategic actions</b>	<p>Strategic actions will be identified and validated through ongoing marketplace assessments, the gathering and analysis of data and the outcomes of strategic actions. Based on the current situation, confirmed strategic actions include:</p> <ul style="list-style-type: none"> <li>• Complete inspections to test the validity of the results generated from the travel services sector’s self-assessment questionnaire pilot project completed in 2023 (to be completed in 2024).</li> <li>• Building on historical compliance data, self-assessment results and inspection outcomes, develop a predictive model to guide future travel service sector inspections (to be completed in 2024).</li> <li>• Determine the impact of predictive modelling-based inspections for the travel services sector and then implement, followed by assessment of predictive models for other licensed sectors (to be completed in 2025 and 2026).</li> <li>• Increase credit card issuers’ awareness of “statutory chargeback” obligations on distance sales contracts, followed by inspections to confirm compliance (to be completed in 2024 and 2025, as appropriate).</li> <li>• Consistent with our mandate, monitor the marketplace and provide timely and reliable information to government, including in support of the BC Government’s ongoing consumer protection modernization project (to continue through 2024 and 2025, as appropriate).</li> </ul>
<b>Strategic outcome</b>	<p>Achievement of the strategic outcome will be assessed through the campaign’s performance measures. These indicators will: a) show education consumption rates; and b) help consumers make more informed decisions when interacting with payday lenders and debt collectors.</p> <p><b>Desired strategic outcome:</b></p> <ul style="list-style-type: none"> <li>• By ensuring the compliance of contracts and agreements, consumers are better protected and businesses reduce the risk of being subject to progressive enforcement action.</li> </ul>

<b>Focus area 4: Enhancement and standardization of administrative and operational processes</b>	
<b>Strategic objective</b>	Using a quality management approach, assess and refine organizational processes, procedures and responsibilities to ensure consistency, improve productivity, reduce costs, increase efficiency and align corporate objectives.
<b>Strategic rationale</b>	The following assumptions support the strategic value of this objective and offer evidence that the application of corporate resources and capabilities to this area of focus will result in positive strategic outcomes:



	<ul style="list-style-type: none"> <li>• The organization’s administrative and operational processes have been developed over time and may not be reflective of current operations or the dynamic, ever-evolving BC marketplace.</li> <li>• Through the application of consistent and standardized processes, customers benefit from more effective service delivery and experience higher rates of satisfaction.</li> <li>• Organizations that have unclear processes, or processes that are not consistently applied, may be subject to increased liability. By ensuring sound processes are in place, the likelihood and potential harm of risk scenarios are reduced.</li> <li>• Quality management principles support effective employee relations. With clear processes in place and a quality-driven culture, onboarding periods are shortened, engagement is strengthened, company values are understood and operationalized and there is a collective effort to achieve quality objectives.</li> <li>• With quality management emphasizing evidence-based decision-making, and the continuous collection and analysis of data, desired business results are more easily achieved.</li> <li>• The Board of Directors can focus with confidence on organizational outcomes, risk mitigation and other key aspects of governance, confident that underlying administrative and operational processes are sound as measured by independent certification.</li> <li>• Our corporate reputation with key interest holders is enhanced when processes are consistently improved and enhanced.</li> </ul>
<b>Strategic actions</b>	<p>These strategic actions build on recent internal and external analysis of administrative and operational processes and are based on a Quality Management Plan produced in 2023. Based on the current situation, confirmed strategic actions include:</p> <ul style="list-style-type: none"> <li>• Externally validate Consumer Protection BC’s cybersecurity program to confirm that best practices are deployed to manage and secure data, systems and all related technology processes (to be completed in 2024).</li> <li>• Complete ISO27001 (Data Security) readiness, external audit and certification implementation (to be completed in 2024).</li> <li>• Using principles from the Quality Management Plan and outcomes from the 2023 proof of concept project, implement, monitor and adjust high-priority Inquiry Centre-focused recommendations (to be completed in 2024).</li> <li>• Develop a Quality Management System to document processes, procedures and responsibilities for achieving Consumer Protection BC’s quality objectives (to be completed in 2024 and 2025).</li> <li>• Using a quality management approach, finish a review of high-priority, external customer-facing processes (licensing, compliance, enforcement and motion</li> </ul>

	<p>picture classification) and confirm and implement recommendations for enhancement and standardization (to be completed in 2025).</p> <ul style="list-style-type: none"> <li>Using a quality management approach, complete a review of medium-priority, internal-customer facing processes (employees, contractors and vendors) and confirm and implement recommendations for enhancement and standardization (to be completed in 2026).</li> <li>Complete ISO9001 (Quality Management) readiness (to be completed in 2026).</li> </ul>
<b>Strategic outcome</b>	<p>Achievement of the strategic outcomes will be measured by developing a quality management system, measuring the value of completed enhancements and identifying progress towards, and achievement and maintenance of, ISO standards.</p> <p><b>Desired strategic outcomes:</b></p> <ul style="list-style-type: none"> <li>By successfully achieving cybersecurity certification, Consumer Protection BC will strengthen its resilience against potential cyber incidents.</li> <li>By applying quality management principles, Consumer Protection BC will increase customer satisfaction, standardize processes and strengthen its reputation as a value-added regulator.</li> </ul>

#### Focus area 5: Education grant program

<b>Strategic objective</b>	Establish and administer a grant program designed to broaden consumer education for British Columbia consumers and foster business compliance with BC's consumer protection laws.
<b>Strategic rationale</b>	<p>The following assumptions support the strategic value of this objective and offer evidence that the application of corporate resources and capabilities to this area of focus will result in positive strategic outcomes:</p> <ul style="list-style-type: none"> <li>Consumer education, as noted in Article 7 of our Administrative Agreement, is one of our core functions.</li> <li>Consumer education initiatives raise consumer awareness of rights and responsibilities.</li> <li>We apply principles of progressive enforcement to foster business compliance with BC's consumer protection laws. In most instances, educating consumers and businesses is an important step before using progressive enforcement tools and supports voluntary business compliance and consumer transaction resilience.</li> <li>The balance of the Consumer Advancement Fund significantly increased in 2023.</li> <li>The Business Practices and Consumer Protection Regulation allows for the payment of grants from the Consumer Advancement Fund to organizations that deliver consumer protection services.</li> </ul>

	<ul style="list-style-type: none"> <li>• Through the provision of third-party grants to organizations with consumer and business education expertise, we will increase the scope and scale of educational efforts and increase consumer resilience and business compliance in the marketplace.</li> <li>• Using grants to enhance consumer education and resilience and business compliance supports the BC Government’s commitment to affordability for BC families.</li> </ul>
<b>Strategic actions</b>	<p>Strategic actions will be identified and validated through ongoing marketplace assessments, analysis of internal data and outcomes of strategic actions. Based on the current situation, confirmed strategic actions include:</p> <ul style="list-style-type: none"> <li>• Preparation of a grant program plan to outline the purpose, objectives, key performance indicators and steps necessary for establishing a successful grant program (to be completed in 2024).</li> <li>• Initial grant initiatives delivered with Consumer Protection BC’s oversight. Detailed reports submitted by grant recipients related to proposal achievements and success criteria (to be completed in 2025).</li> <li>• Ongoing grant program criteria will be confirmed, and additional grant applications will be accepted, evaluated and awarded (to be completed in 2026).</li> </ul>
<b>Strategic outcome</b>	<p>Achievement of the strategic outcome will be measured by assessing grant recipients’ abilities to achieve the deliverables outlined in their applications and education delivery contracts. As required, research will be completed to determine if consumer marketplace behaviours have changed or there is a reduction of consumer risk in the marketplace.</p> <p><b>Desired strategic outcome:</b></p> <ul style="list-style-type: none"> <li>• By implementing an education grant program, guided by effective administration principles, Consumer Protection BC’s delivery of consumer education will grow which will result in strengthened consumer resilience and business compliance.</li> </ul>

### Core operational deliverables:

Our mandate and core operational deliverables are defined by the *Business Practices and Consumer Protection Authority Act* and in the Administrative Agreement with the Province. Additional operational perimeters are clarified in consumer protection legislation and organizational policy. This section of the Business Plan provides summary information about each core operational deliverable, including indicators that define trends in operational performance.

### Inquiry deliverables

We are responsible for assisting consumers by providing information on a wide range of marketplace issues. The inquiry process uses online intake to narrow consumer issues and may result in the submission of a complaint form. Inquiries are either resolved by Licensing & Information Officers via shared information, self-help tools or referrals, or escalated to the Compliance and/or Enforcement teams for further action.

Key operational deliverables include the maintenance of online intake processes, the provision of information and assistance to consumers and inquiry assessment for escalation.

These functions are vital for ensuring that consumers have the information necessary to solve issues themselves or have complaints addressed through the application of BC's consumer protection laws.

Core Delivery Indicators (CDI)	2022 (Actual)	2023 (Estimated)	2024 (Expected Range)	2025 (Forecast Range)	2026 (Forecast Range)
<b>Total inquiries</b>	9,314	9,000 - 10,000	9,000 - 10,000	8,000 - 9,500	7,500 - 9,000
<b>Total in-mandate inquiries</b>	35%	33 - 35%	33 - 40%	38 - 42%	40 - 44%
<b>Complaints escalated</b>	80	70 - 90	80 - 120	90 - 130	100 - 140

### Licensing deliverables

We are responsible for issuing and renewing licences for delegated business sectors and individuals. We use an online licensing platform (MyAccount) and manual efforts to receive and administer licence renewals, new applications and required licensing submissions.

Key operational deliverables include providing relevant pre-licence information to potential licensees, facilitating new licence applications, delivering renewal reminder notices to existing licence holders, facilitating renewal applications and maintaining a registry of licensed businesses and individuals.

These functions are critical for ensuring that businesses and individuals operating in licensed sectors and occupations are properly licensed and are adhering to relevant laws and regulations. By maintaining a registry of licensed businesses and occupations, Consumer Protection BC provides transparency and accountability to consumers and other interest holders.

Core Delivery Indicators (CDI)	2022 (Actual)	2023 (Estimated)	2024 (Expected Range)	2025 (Forecast Range)	2026 (Forecast Range)
<b>Total licences issued</b>	7,451	7,000 - 8,000	7,000 - 8,000	7,000 - 8,000	7,000 - 8,000

<b>New licence applications processed</b>	1,905	1,200 - 2,000	1,200 - 2,000	1,200 - 2,000	1,200 - 2,000
<b>Licences (businesses and individuals) not renewed (expired, or closed)</b>	1,280	1,300 - 1,400	1,300 - 1,400	1,300 - 1,400	1,300 - 1,400

### Compliance and enforcement deliverables

We are responsible for ensuring that licensed businesses and individuals are compliant with BC's consumer protection laws. Inspections of licensed businesses and individuals are performed according to a risk-based model, with successful inspections resulting in the detection and resolution of non-compliant activity.

We are also responsible for ensuring that consumer trade practice complaints are addressed and that businesses and occupations subject to complaints are inspected when consumer risk is identified.

Key operational deliverables include field and remote inspections which are based on data from complaints, licensing, business practices and previous inspections and enforcement to determine inspection priorities. Where non-compliance exists, inspectors open and manage cases to take various actions, including licensing suspension or cancellations, and imposing orders and penalties.

These functions are critical to ensure that businesses and individuals, whether licensed or not, are adhering to relevant consumer protection laws.

<b>Core Delivery Indicators (CDI)</b>	<b>2022 (Actual)</b>	<b>2023 (Estimated)</b>	<b>2024 (Expected Range)</b>	<b>2025 (Forecast Range)</b>	<b>2026 (Forecast Range)</b>
<b>Total inspections of licensed businesses</b>	340	175	200 - 210	200 - 220	200 - 220
<b>Inspection rate of compliance</b>	50%	32%	30 - 40 %	30 - 40 %	30 - 40 %
<b>Percentage of licence holders inspected</b>	10%	6%	6 - 8%	8 - 10%	8 - 10%
<b>Cases opened</b>	208	150	160 - 180	190 - 210	190 - 210
<b>Cases closed through voluntary compliance</b>	87	70	110 - 120	120 - 130	120 - 130
<b>Cases closed through enforcement actions</b>	48	64	40 - 50	40 - 50	40 - 50
<b>Reconsiderations of enforcement actions</b>	2	1	0 - 2	0 - 2	0 - 2

### Motion picture classification deliverables

We are responsible for the classification of motion pictures exhibited in British Columbia. Seven categories, commonly referred to as ratings, along with advisories are used to describe the viewing

appropriateness of each motion picture. Additionally, we designate trailers to ensure their placement is appropriate given the classification of the feature motion picture.

Key operational deliverables include the receipt of motion picture content, classification or designation decisions, publication of all classifications and distribution of classification certificates.

These functions are critical in reflecting community standards and helping inform consumers in advance of watching motion pictures.

<b>Core Delivery Indicators (CDI)</b>	<b>2022 (Actual)</b>	<b>2023 (Estimated)</b>	<b>2024 (Expected Range)</b>	<b>2025 (Forecast Range)</b>	<b>2026 (Forecast Range)</b>
<b>Motion picture classifications</b>	632	685	650 - 680	650 - 680	650 - 680
<b>Classification turnaround time</b>	13.6 days	13.3 days	12 - 14 days	12 - 14 days	12 - 14 days
<b>Trailer designations</b>	599	680	650 - 700	650 - 700	650 - 700
<b>Fee waived classifications</b>	487	550	500 - 550	500 - 550	500 - 550
<b>Number of reconsiderations</b>	0	1	0 - 1	0 - 1	0 - 1

### Education deliverables

We are responsible for delivering education to raise awareness of consumer rights and responsibilities under BC's consumer protection laws and inform regulated businesses about statutory requirements.

Key operational deliverables include establishing and managing social media platforms, writing and sharing informational blog posts, engaging with traditional media, writing accessible website content with the user experience in mind, delivering public education campaigns, advertising and using email marketing to educate consumers and licensed businesses.

These functions are critical to supporting a marketplace where: a) consumers have access to useful, easy to understand information and resources about their rights; and b) licensed and regulated businesses voluntarily comply with BC's consumer protection laws.

<b>Core Delivery Indicators (CDI)</b>	<b>2022 (Actual)</b>	<b>2023 (Estimated)</b>	<b>2024 (Expected Range)</b>	<b>2025 (Forecast Range)</b>	<b>2026 (Forecast Range)</b>
<b>Blog posts written or updated</b>	41	25	35 - 45	35 - 45	35 - 45
<b>Media inquiries managed</b>	34	35	30 - 50	30 - 50	30 - 50
<b>Social engagement (total followers):</b>					

<ul style="list-style-type: none"> <li>• Facebook</li> <li>• Instagram</li> </ul>	69,630 4,133	72,000 5,100	+1,000 - 2,000 +400 - 1,000	+1,000 - 2,000 +400 - 1,000	+1,000 - 2,000 +400 - 1,000
<b>Website pageviews</b>	935,701	650,000 <sup>2</sup>	750K - 950K	750K - 950K	750K - 950K
<b>Consumer email subscribers</b>	5,855	6,400	+300 - 800	+300 - 800	+300 - 800

### Compensation and education fund deliverables

We are responsible for the administration of three compensation or education funds. Key operational deliverables include trustee administration of the Travel Assurance Fund, the Consumer Advancement Fund and the Consumer Financial Education Fund.

These functions are critical in ensuring that resources are available to: support consumer awareness of important marketplace issues; ensure consumers have access to unbiased financial information; and guarantee that consumers who have not received travel services from licensees have access to compensation.

Core Delivery Indicators (CDI)	2022 (Actual)	2023 (Estimated)	2024 (Expected Range)	2025 (Forecast Range)	2026 (Forecast Range)
<b>Travel Assurance Fund balance</b>	\$6,308,967	\$6,000,000 - \$6,500,000	\$6,500,000 - \$7,000,000	\$6,500,000 - \$7,000,000	\$6,500,000 - \$7,000,000
<b>Travel Assurance Fund claims processed</b>	2	0 - 15	<100	<100	<100
<b>Compensation provided through the Travel Assurance Fund</b>	\$20,000	\$30,000 - \$50,000	0 - \$500,000	0 - \$500,000	0 - \$500,000
<b>Consumer Advancement Fund balance</b>	\$914,515	\$8,000,000 - \$10,000,000 <sup>3</sup>	\$15,000,000 - \$17,000,000	\$15,000,000 - \$17,000,000	\$15,000,000 - \$17,000,000
<b>Consumer Advancement Fund expenditures</b>	\$116,875	\$250,000 - \$550,000	\$500,000 - \$1,000,000	\$500,000 - \$1,000,000	\$500,000 - \$1,000,000
<b>Consumer Financial Education Fund balance</b>	\$64,779	\$100,000 - \$150,000	\$100,000 - \$150,000	\$150,000 - \$200,000	\$175,000 - \$225,000

<sup>2</sup> The decrease is attributed to unintended impacts resulting from Microsoft updates and related website reconfiguration processes.

<sup>3</sup> The increase of the CAF balance in 2023 is due, in part, to payments made by financial institutions as a result of signed Undertakings related to mortgage discharges.

<b>Consumer Financial Education Fund expenditures</b>	\$19,235	\$10,000 - \$20,000	\$25,000 - \$50,000	\$25,000 - \$50,000	\$25,000 - \$50,000
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### Public policy deliverables

We are responsible for providing the BC Government with timely and reliable information on matters of public interest and the administration of consumer protection legislation. This includes, when requested, policy advice on government’s legislative and regulatory proposals and, where appropriate, recommendations to the Province for legislative or regulatory changes.

Key operational deliverables include engagement with licensed sectors and related industry associations, the provision of Business Plans and Annual Reports to the Minister, quarterly meetings with the defined provincial liaison and annual liaison engagement with the Board of Directors.

These functions are critical to ensure we meet our consumer protection and public interest mandate, supports enhancements to consumer protection laws and ensures that we are accountable to the Province for the administration of delegated legislation.

<b>Core Delivery Indicators (CDI)</b>	<b>2022 (Actual)</b>	<b>2023 (Estimated)</b>	<b>2024 (Expected Range)</b>	<b>2025 (Forecast Range)</b>	<b>2026 (Forecast Range)</b>
<b>Administrative Agreement compliance</b>	100%	100%	100%	100%	100%
<b>Quarterly liaison meetings</b>	4	4	4	4	4
<b>Liaison Board engagements</b>	1	1	1	1	1

### Areas of principal risk

In each business planning cycle, the areas of principal risk are articulated, a risk appetite for each area is established and risk tolerances are set (which are monitored and mitigated as required). The current areas of principal risk include:

<b>Financial risk</b>	Specific risk factors include investment, liquidity, capital and business model risk. Mitigation efforts ensure enough liquidity and capital to meet our long-term operational obligations.
<b>Legal risk</b>	Specific risk factors include civil litigation, judicial review and tribunal risk. Mitigation efforts focus on consistent and reasonable administration of our delegated authority, supported, where necessary, by sound legal advice and experienced legal counsel.
<b>Compliance risk</b>	Specific risk factors include act and regulation, laws and contract (agreement) risk. Mitigation efforts focus on the completion of regular compliance assessments with various interest holders, including the Ministry of Public Safety and Solicitor General, the Office of the Information and Privacy Commissioner for BC, legal counsel and our auditors.



<b>Technology risk</b>	Specific risk factors include data breach, data loss and system failure risk. Mitigation efforts focus on the readiness of our Business Recovery Action Plan and the evolution of our IT Disaster Recovery Plan, which specifically protects our data and systems from intrusion and creates data redundancy and cybersecurity hardness.
<b>Reputation risk</b>	Specific risk factors include licensed business, government, public and inclusion, diversity, equity and accessibility risk. Mitigation efforts focus on clear and concise communications with all interest holders and providing corporate responses to any regulatory or operational issues in a timely, inclusive and transparent manner.
<b>Strategic risk</b>	Specific risk factors include strategic planning, strategic alignment and business strategy implementation risk. Mitigation efforts focus on filling the Board skills and composition matrix, sound intelligence presented at strategic planning sessions and regular accountability reporting to interest holders.

## Financial plan

Consumer Protection BC is a cost-recovery organization. Our revenue is primarily generated through licensing fees. This ensures licensed businesses and individuals fund annual regulatory and general consumer protection costs, as required by legislation.

The following budget outlines the financial and human resources required to deliver on our overall regulatory purpose and execute the areas of strategic focus articulated in this 2024 - 2026 Business Plan. Wherever possible the viability of future revenue and maximized efficiencies through cost savings have been assessed. This process is a continuation of the balanced fiscal direction taken since our establishment in 2004.

<b>Operating budget</b>				
<b>Resources and outputs</b>	<b>Fiscal year (\$ thousands)</b>			
	<b>2023 estimate</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
Total revenue	\$7,522	\$7,495	\$8,069	\$8,420
Total expenditures	\$7,420	\$7,758	\$7,987	\$8,306
<b>Excess (deficiency) of revenues over expenditures</b>	\$102	(\$262)	\$82	\$113
<i>Full time employees (FTEs)</i>	43.09	45.83	48.75	48.75
<b>Operating reserve budget</b>				
Investment income	\$100	\$247	\$217	\$227
Investment expense	\$16	\$17	\$18	\$19
<b>Excess of revenues over expenditures</b>	<b>\$84</b>	<b>\$230</b>	<b>\$199</b>	<b>\$208</b>

<b>Capital reserve budget</b>				
Gain/(loss) on sale of asset	\$0	\$0	\$0	\$0
Amortization	\$76	\$95	\$109	\$125
<b>Deficiency of revenue over expenditure</b>	<b>-\$76</b>	<b>-\$95</b>	<b>-\$109</b>	<b>-\$125</b>
<i>Base and planned expenditures</i>	\$138	\$145	\$315	\$95