



The voice for water consumers  
Llais defnyddwyr dŵr

## CCW's Strategy 2021-24

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## 2. Chair's Introduction

**I am delighted to introduce you to our Forward Work Programme for April 2021 to 2024. It sets out the priorities and four main campaigns that will shape our work over the next three years and help us to achieve our ultimate goal - Securing a fair deal for water consumers, now and in the future.**

That mission has taken on an even greater urgency due to the unfolding impact of Covid-19 which has cast a shadow over all of our lives during the past 12 months. Millions of households and businesses<sup>1</sup> are counting the cost of the damage inflicted by the pandemic. The dawn of 2021 brings with it fresh hope but it will take a long time for the economic and social wounds to heal. That is particularly true for those in our society that have been disproportionately affected, including people from ethnically diverse communities, low-income households and those suffering with underlying health conditions.

One of our most pressing campaigns will be to ensure the water<sup>2</sup> industry is equipped to provide the financial support with bills that struggling customers need. Before the pandemic struck, around three million households said their water bills were unaffordable but that number will grow as unemployment and business closures continue to rise. People aged under 25, over 75 or from ethnic minority groups were most at risk of missing out on financial support with bills. Updated research will allow us to assess how that picture has changed as a result of the pandemic. Our campaign to make water and wastewater services affordable for everyone will aim to ensure that customers who struggle to pay their bill receive meaningful support that reflects their need.

Collaboration will be imperative to ensuring we turn the tide of water poverty, which is why we will cast our net far and wide to capture the expertise and insight needed to find effective solutions. A key milestone in achieving this will be the completion of our independent review of water affordability on behalf of the UK and Welsh Governments in spring 2021. Working with partners from across the water sector and beyond we hope to deliver a package of recommendations that will put us on the right path to providing stronger and more sustainable support for customers facing hardship.

We also want to see the majority of consumers empowered with the knowledge they need to access the range of practical support water companies can offer when they find themselves in vulnerable circumstances. The launch of our Vulnerability Manifesto in November 2020 set out ambitious commitments to break down the barriers to support provided through water companies' priority services. CCW is committed to doing all it can to ensure everyone's voice is heard and we are gathering information from a range of sources on how to remove the obstacles that prevent consumers from being aware of and accessing the support they need. We will be working with water companies and other organisations to achieve this. As well as raising awareness of this support, we'll also provide water companies with a template for success to ensure consumers get the right information at the right time during periods of disruption.

Beyond financial and practical assistance, we know that many consumers are also still missing out on the help they need to resolve a complaint when their water company lets them down. The key to unlocking that support is making sure that more consumers are aware of CCW and the effective role we can play in putting things right. Over the past 15 years we've helped to secure more than

£30 million in financial redress for aggrieved consumers. Through raising our profile and public awareness of CCW we believe thousands more consumers can reap the benefits of our support.

As well as campaigning hard on the issues that cause the most frustration to consumers, we'll also lead the way in helping the industry to learn from its mistakes and share examples of best practice.

Dealing with the immediate difficulties posed by Covid-19 will not distract us from confronting the longer-term challenges facing the sector. In the past year we've seen further evidence of the pressure our growing population and increasingly volatile climate is putting on our water and wastewater services. Consumers expect water companies to meet these environmental challenges head-on through innovation and investment, while keeping bills affordable in the short and long term. It's a difficult balancing act but one that is more achievable if we ensure the voices of tomorrow's customers – not just today's – are heard and have a stake in the decisions that impact their future. That's why we'll be expecting water companies to act on future water customers' voices. We'll work with companies to help them understand what the next generation of customers expect on everything from communication and customer service to keeping bills affordable and protecting the environment.

Our campaigning will be driven by the views and concerns of consumers – captured through the thousands of complaints we handle every year and our extensive programme of research. Making our research plans more flexible will also mean we can more easily keep our finger on the pulse of consumers' evolving priorities.

Consumers will also be able to continue to rely on us to help put things right when their water company or water retailer gets things wrong. Simply resolving complaints is not enough though. The industry needs to learn from its mistakes and get more things right first time. We'll be creating more opportunities for water companies and retailers to come together and share best practice through our industry workshops and insights from our complaint and debt assessments.

**Our three-year strategy will set us on a new course that will make us an even stronger advocate for consumers and an effective partner for positive change within the sector.**

*Robert Light*

**Robert Light**  
Chair, CCW



<sup>1</sup> Where we use 'business' this refers to all non-household consumers, such as government departments and bodies, regional and local authorities, NHS trusts, schools, religious organisations and charities

<sup>2</sup> Where we use 'water' we often mean water and wastewater companies

# 3. Our Mission and Objectives



**Our Mission is:  
Securing a fair deal  
for water consumers,  
now and in the future.**

We have five objectives to help us achieve this mission:



Affordable water for everyone.



Climate resilient water & sewerage services for present & future consumers.



Services shaped by the views of customers.



Services that meet everyone's needs.



Effective and easy to follow complaint processes.

We will use a combination of approaches to help us achieve our mission and objectives: campaign work, the sharing of best practice from across the sector and beyond, and being the voice of water consumers, now and in the future, in debates that impact them.

# 4. Our Strategic Campaigns

In order to deliver our mission, our work will prioritise four key strategic campaigns. These have been shaped by a continuous review of our policy priorities, in response to the changing needs of both household and business consumers. We'll be working hard over the coming months to bring these to life in a way that resonates with consumers. Our work on consumer complaints provides

immediate support for water consumers when they need it most and – coupled with our research – gives us valuable insight into the issues that need to be resolved. We talk more about that work in section 6.

The following pages consider these campaigns in more detail, including why they are important and the change we want to achieve.

**End  
water  
poverty**

**CCW: a  
voice  
for your  
complaint**

**End sewer  
flooding  
misery**

**“Be in the  
know” about  
available  
help**





Strategic Campaign 1

End water poverty

Why our campaign is important

Even before the economic impact of Covid-19, 1 in 10 households in England and Wales told us that they struggled to afford their water bill.

Water companies do offer help through social tariffs, but the number of people who we think could qualify for this support far exceeds the level of funding that is available. There are also certain groups who are even more at risk of missing out on financial support with bills – the under 25s, over 75s and minority ethnic groups.

We want to drive change to create a fairer system that offers meaningful help to everyone who struggles to pay their bills.



Customers' views on being able to afford their bill as a result of Covid-19

A quarter (25%) were more worried about paying their water bill than they used to be.

May 2020 WaterVoice Panel

To deliver our campaign, we will:

- Work with Governments to introduce changes recommended by the CCW Water Affordability Review to improve support schemes for customers. We will do this by engaging with MPs and MSs to add their support to our campaign
- Get other consumer champions to join us in our call for change, including StepChange, Citizens Advice (CA), CA Cymru and National Energy Action
- Speak out in the media to call for change based on the findings of our Water Affordability Review
- Develop a bespoke campaign identity that combines impactful design with a cohesive narrative that resonates with its intended audience and supports the objective above.
- Encourage best practice sharing by companies who are making good progress towards eliminating water poverty, and who demonstrate a good understanding of the underlying causes and how to raise consumer awareness of support
- Where appropriate encourage the sharing of Government data to help water companies and regulators identify those who need support
- Make sure the help retailers offer due to Covid-19 is getting to the business customers who need it

Judge us by our results – these are the outputs we want to see:

- No one is in water poverty by 2030, with the number of customers supported through schemes to reduce bills increasing from around 1m to at least 2m by 2024
- By 2024 the approach to social tariffs in England and Wales reflects the recommendations we make to the governments in our Water Affordability Review

Strategic Campaign 2

CCW: a voice for your complaint

Why our campaign is important

Some household and business consumers are unaware of our free service, which can help them resolve their complaint against their water or wastewater provider.

That means they could also be missing out on a refund, compensation or help getting the water supply or wastewater service problem fixed. We don't think that is fair.

Making sure consumers know who their water consumer champion is represents a big step towards them getting our help and support when they need it.



Business customer's story

Welling United Football Club received an unexpectedly large water bill in August 2019. An investigation revealed a leak, which had been caused by Thames Water fitting the water meter incorrectly.

The club's water retailer, Castle Water, failed to adequately argue that the club should receive a full refund as the leak was the result of the wholesaler's poor work on the meter. This resulted in the club only receiving a refund of £17,000 - a small percentage of the overall bill.

The club approached CCW for help in resolving the matter as the large bill put its future in jeopardy, particularly in light of the ongoing pandemic. Our intervention led to the club receiving compensation of £75,000 – making all the difference to its survival.

To deliver our campaign, we will:

- Drive impactful policy campaigns to ensure the CCW brand is visible to water consumers. Linking up with local or national charities where this is useful for consumers
- Address systemic issues by sharing best practice to ensure improved outcomes for household and business consumers
- Continually improve our own performance in complaint handling and our role in the overall complaints process
- Use the media to give a clear voice to water consumer issues and raise awareness of our role
- Develop a bespoke campaign identity that combines impactful design with a cohesive narrative that resonates with its intended audience and supports the objective above
- Boost our social media presence to increase the visibility of our service, including using case studies to showcase our consumer success stories
- Increase our visibility to consumers and business customers by making sure CCW's brand and service is clear on water company websites
- Increase our 'on the ground' visibility after major water supply incidents, by providing pro-active help when it is needed to reach out to those consumers who aren't online

Judge us by our results – these are the outputs we want to see:

- Brand recall to increase from less than 1% to 3% by 2024
- Our existing customers say they had heard of us prior to contacting us to increase from 18% to 30% by 2024
- Consumer satisfaction with CCW's service increases to at least 80% by 2024. We will review this target at the end of 2021-22, to drive year-on-year improvement over the period of the Strategy



Strategic Campaign 3

End sewer flooding misery

Why our campaign is important

Being flooded with sewage - particularly inside our home or business - is one of the worst ways our wastewater company can fail us and the environment. It shouldn't happen but during 2019-20 there was a 14 per cent increase in the number of properties that were flooded as a result of a company sewer.

Some households and businesses even have to endure the misery of being flooded more than once. It must be particularly frustrating for these repeated victims of flooding that the compensation payout by wastewater companies can leave you out of pocket. Added to this, the clean up or help towards an increase in insurance premiums can be slow.

We think this all needs to change.

That is why we want additional support and compensation for those who suffer repeated sewer flooding, coupled with more widely improved service standards for all those affected.

It isn't just about fixing things well if they go wrong. We also want to see the wastewater companies preventing flooding before it happens by working together, with other flood risk agencies, to better plan and anticipate where the problems will happen. Sewer flooding can often be the result of a range of different factors, and planning through the long-term Drainage and Wastewater Management Plans will require a multi-agency approach and ultimately investment. These plans are where companies, and other flood risk agencies, look ahead to understand the risk of sewer flooding in their patch, which allows them to get ahead of the game in finding solutions to future capacity problems.

To help resolve sewer flooding more widely, consumers will need to be more aware of the impact that wet wipes and other 'unflushables' can have on causing sewer blockages. Responsible disposal of these items can reduce blockages and therefore sewer flooding and pollution. We will be working with the industry to ensure a joined up approach to getting the 'don't flush it!' message into consumers' minds.



Our [resilience report](#) found up to 14% more properties were flooded with sewage in 2019-20 compared to the previous year.

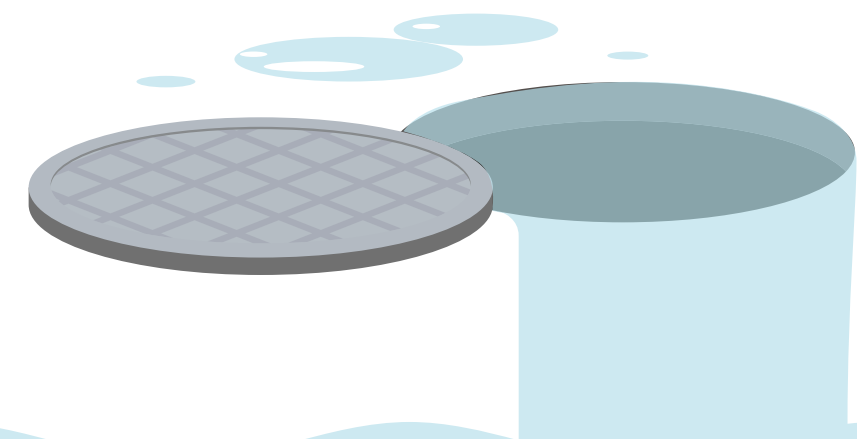
To deliver our campaign, we will:

- Develop a bespoke campaign identity that combines impactful design with a cohesive narrative that resonates with its intended audience and supports the objective above
- Act on behalf of those being repeatedly flooded to get the problem investigated, mitigated and long-term remedies identified with better compensation until the issue is resolved
- Run a best practice session with the sector, so those wastewater companies leading the field can share their good ideas and a consensus can be formed on what a 'good service' looks like
- Investigate which companies still use the exceptional weather caveat (which means a wastewater company doesn't need to pay out), and whether it is fit for purpose
- Get companies to commit to cleaning up after sewer flooding in all circumstances where their asset is responsible.
- Get companies to commit to a standard on site response time for inside and outside sewer flooding
- Compensation to be aligned so the financial and emotional losses are considered, for example, in some cases this could be covering the customer's insurance excess, as a minimum

- Work in partnership with wastewater companies, regulators and other flood risk agencies to inform the development of drainage and wastewater management plans
- Work across England and Wales with wastewater companies to monitor performance against their internal sewer flooding performance commitment
- Work in partnership with the water sector and play a strong role in informing consumers about sewer misuse, for example from fats, oils, grease and wet wipes
- Work in partnership on a Taskforce on sewer overflows to help reduce pollution in the environment

Judge us by our results – these are the outputs we want to see:

- More support and compensation for those who suffer repeat sewer flooding by 2023
- Standard on site times by 2023 and a review of how the compensation is offered
- After reviewing the exceptional weather caveat, we may want the exceptional weather 'get out' removed from companies' policies by 2023



Strategic Campaign 4

# "Be in the know" about available help

Why our campaign is important

We all need a bit of extra help now and then. For some of us, this is a short-term need, when we have just come out of hospital or had a new baby. Some of us – those who are disabled or with long-term health problems – need a bit of extra help all the time.

That's why water companies have Priority Services Registers<sup>3</sup>. Once water companies know which of their consumers need extra help (even if it is only for a short time), they can target that support if the water goes off, if information is needed in braille or if someone doesn't like answering the door to strangers.



Only 42% of consumers are aware of this help and we don't think this is enough. Our [Water Matters report](#) also found that while Black-African customers have higher than average engagement in water company activity, it is significantly lower for other minority ethnic customer groups. We believe that companies need to develop an understanding of the needs of these groups, so that they can improve engagement where necessary. They also need to make sure all of their consumers are aware of their Priority Services Register, and get more people signed up. We will play our part too.

Consumers' views on awareness of getting support when they need it:

Our latest [Water Matters survey](#) found fewer people were aware of support for vulnerable consumers than before.

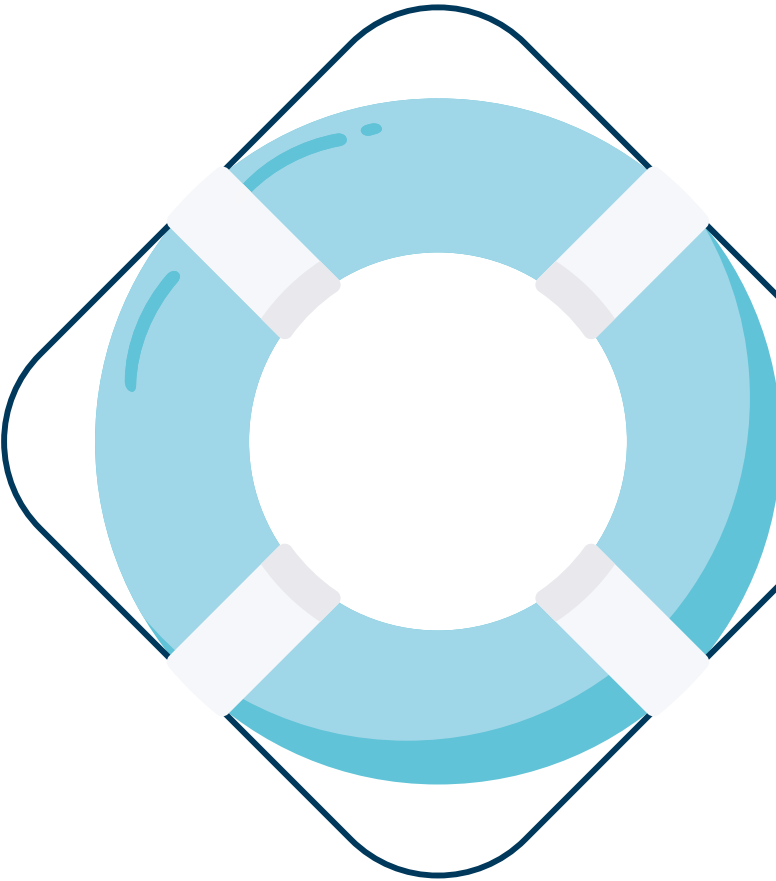
<sup>3</sup> All water companies in England and Wales have schemes which allow consumers to register for free additional support so that whatever their circumstances they have appropriate access to water and sewerage services. See more information on our website [here](#).

To deliver our campaign, we will:

- Ask Governments in England to improve information-sharing across departments and make sure water companies and regulators can access official data about who needs help
- Get other consumer champions to join us in our call for change, such as Citizens Advice (CA), CA Cymru and National Energy Action
- Work in collaboration with others for easier routes for consumers to sign up for and manage the support they need across sectors
- Develop a bespoke campaign identity that combines impactful design with a cohesive narrative that resonates with its intended audience and supports the objective above
- Use our influence with water companies to sharpen their focus on raising consumer awareness of the help available, and monitor the number of people signed up for extra help by amplifying the messages in our [Vulnerability Manifesto](#). This includes the need to re-engage with communities as participating partners to develop an understanding of the communities' needs
- Target our own and water companies' communications to sections of society who would benefit from knowing about the registers, including getting the message to consumers when their water supply goes off unexpectedly. We will make sure our information is inclusive and therefore accessible to all, for example by making it available in several languages
- Increase our 'on the ground' visibility after major water supply incidents, by using our local networks and techniques such as research to reach out to those consumers who may need extra help

Judge us by our results – these are the outputs we want to see:

- Consumer awareness of the priority services register increases to 55% by 2024 and to 75% by the end of 2030
- The number of consumers signed up to companies' Priority Services Registers increases to 6% by 2024 – a milestone towards their overall performance commitment requirement of 7% by 2025





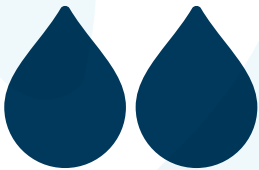
# 5. Hearing from water consumers – our research

For 2021-22 we will carry out our annual household consumer tracking research Water Matters and Testing the Waters which tracks the views of business consumers. We will still also use WaterVoice, our consumer engagement work, so we can listen to household and business consumers' views on a range of subjects quickly and easily. We are also going to work in partnership with Ofwat on some of our research projects during 2021-22.

Our other consumer research work will focus on projects and thinking that will be required to develop either our current or future campaigns and to create our policies.

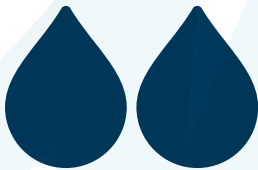
To bring equality, diversity and inclusion issues to life through our consumer work, we will continue to seek opportunities to learn how the experiences of specific groups may differ, using our insights from research, complaints or elsewhere. In addition to our usual focus on consumers in vulnerable circumstances, we want to understand in more depth the detriment experienced by people in the following areas: race, disability, age, and those in rural locations. This will allow us to tailor our next steps and policy development, according to the challenges particular groups of consumers are experiencing:

To help water companies improve how they conduct research, particularly for the Price Review, we asked consumers for their views:



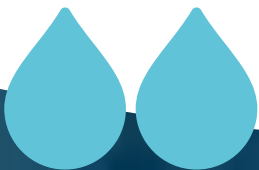
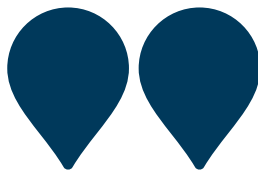
**You'd have to be a specialist to answer that.**

Household Customer, Swansea



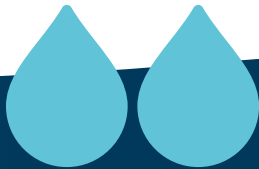
**When you're doing an online survey, you don't always get anything back – whether it's been useful or led to anything.**

Business Customer, Crawley



**If it's a proper [set of] questions, it can benefit the community, it can benefit the country and actually make a difference for the better.**

Household Customer, Exeter



**It's important, but it needs to be easier or shorter.**

Future Customer, Birmingham



[View our research](#)

# 6. Our statutory responsibilities and ongoing work

We have outlined our focus on campaigns which will help us to bring about tangible changes for water consumers, now and in the future.

There are also other areas that we will be working on so we can make a difference to household and business consumers. These issues include our work on shaping the 2024 Price Review, and improving the retail market for business customers. To give a flavour of some of the other work we do, we have outlined some of it here:

## Some of our 2019-20 ongoing work delivered this for water consumers:




**Almost 750,000**

low-income households now receiving reduced bills through water companies' social tariff schemes, which we helped the industry to develop and promote.




**142 Investigations**

we carried out where we felt a water company or retailer's handling of a complaint had been poor and not delivered a fair outcome for the consumer.



**More than £15 million**

the potential bill savings thousands of households were able to identify through using our water meter calculator.




### Statutory responsibilities of CCW

- Help household & business consumers with enquiries and complaints; and publishing information about water companies' and retailer complaint handling
- Help disadvantaged consumers, such as those in vulnerable circumstances or in rural areas
- Represent the interests of consumers supplied by new entrants to the retail water market

**Be consulted on:**

- Charges schemes
- Some retail market activity
- Draft regulations about the supply of water to a water undertaker by a person other than a water undertaker
- Licence changes as a result of consumer redress schemes
- The UK and Welsh Governments' charging guidance and strategic priorities



**More information on our legal duties is [here](#) on our website.**



### How we will deliver on our statutory responsibilities and other legal duties

- Shaping the development of the framework for the 2024 Price Review to ensure current and future consumers' views make a difference. We will champion engagement with business and household consumers in a meaningful way, and on an ongoing basis, to fully inform the sector's thinking and plans. This will include a clearer reflection of the needs of retailers and business customers in the price review process
- Sharing best practice with water companies, for example on:
  - affordability and vulnerability initiatives
  - complaint handling with retailers and addressing the root causes of business customers' complaints with retailers and wholesalers in England and water companies in Wales
  - helping consumers with their complaints and improving performance
- Representing and campaigning for business customers so their needs are made a priority within decision making in the retail water market, such as on the impact of Covid-19
- Monitoring company progress in meeting 2020-25 performance commitments

- Responding to consultations on issues that could affect water consumers now or in the future
- Work in partnership with the sector to improve the consumer complaint journey; and keeping business and householders' issues in the spotlight by the use of partnerships, media and social media, as well as raising our local and regional media profile. These issues include, but aren't confined to:
  - sewer misuse, such as putting wet wipes down the toilet, or businesses pouring oil down the sink
  - helping households and businesses in partnership with the Market Operator MOSL, the Retailer Wholesaler Group, Unions and Waterwise to use water wisely, benefit the environment and reduce costs
  - seek opportunities to raise the profile of the relationship between water and energy efficiency in a quest to reduce costs and achieve net zero, including in partnership with Citizens Advice during their Big Energy Saving Winter
  - the option of having a water meter



# 7. What we cost water consumers

During 2019-20, we assisted more than 10,000 customers with complaints against their water or wastewater company, helping to return almost £1.5million in financial redress.

The licence fee gives all water consumers in England and Wales access to advice, help and representation when they need it. It also allows us to campaign and represent consumers with Governments, regulators and water companies.

Our work during 2021-24 will cost each water bill payer about 22.5p per year. About the same as 2020-21

We will be moving to new offices in Birmingham and Cardiff during 2021 to promote agile and flexible working practices

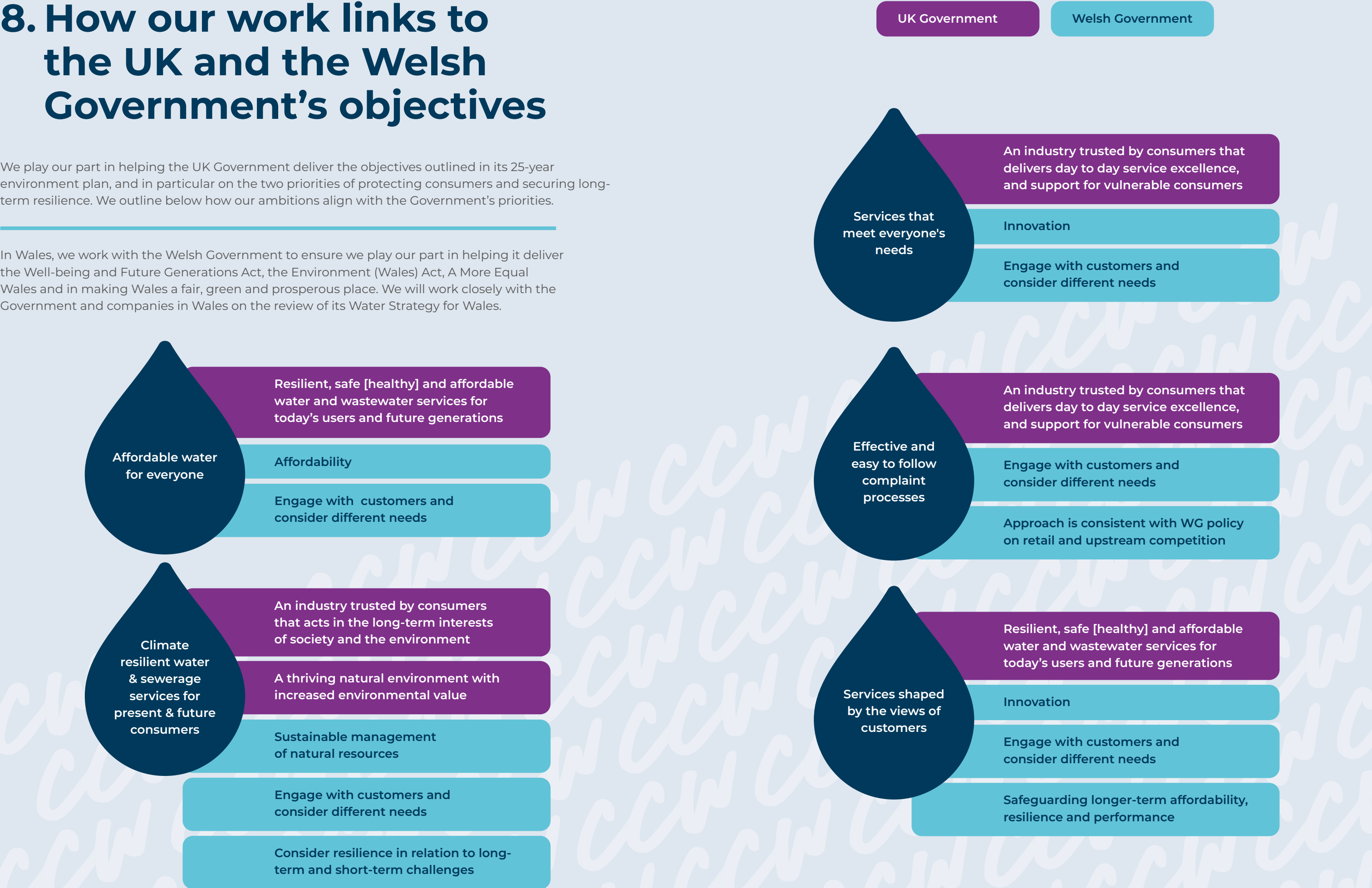
Our licence fee will be £5.970 million in 2021-22. A small increase of £72,000 from £5,898 million in 2020-21



# 8. How our work links to the UK and the Welsh Government's objectives

We play our part in helping the UK Government deliver the objectives outlined in its 25-year environment plan, and in particular on the two priorities of protecting consumers and securing long-term resilience. We outline below how our ambitions align with the Government's priorities.

In Wales, we work with the Welsh Government to ensure we play our part in helping it deliver the Well-being and Future Generations Act, the Environment (Wales) Act, A More Equal Wales and in making Wales a fair, green and prosperous place. We will work closely with the Government and companies in Wales on the review of its Water Strategy for Wales.





The voice for water consumers  
Llais defnyddwyr dŵr



[ccwater.org.uk](https://ccwater.org.uk)