



**The Consumer Council for Water's response
to
Citizen's Advice Scotland consultation
on its draft work plan 2019-20**

January 2019

1 Introduction

- 1.1 The Consumer Council for Water (CCWater) is the statutory consumer organisation representing water and sewerage consumers in England and Wales. CCWater has four regional committees in England and a committee for Wales.
- 1.2 We welcome the opportunity to comment on Citizens' Advice Scotland (CAS) draft Work Plan for 2019-2020. This document sets out CCWater's response.
- 1.3 Overall we are supportive of your draft Work Plan, and we have commented on a number of cross cutting issues where sharing information or working together could increase benefit consumers.

2 Detailed Response

- 2.1 There are a number of cross cutting issues outlined in the draft Work Plan where we believe that there would be value in us working together. Overall, our response focusses on these areas and outlines where we already have evidence which may be of use when considering your future work. We will be happy to discuss any of these areas with you in further detail.

2.2 Helping vulnerable customers

- 2.2.1 There are a number of areas in your work plan that focus on protecting vulnerable customers, which is a key area of our work. We believe it makes sense for us to work together on some of these issues, so we can deliver improved results for consumers by sharing good practice and encouraging service innovation.
- 2.2.2 Your plan at 3.3 focuses on increasing awareness of priority services registers. We have extensive experience of this within the water sector, and will be very pleased to share with you the actions that have made a difference.
- 2.2.3 Whilst priority service registers work well for people with longer term support needs, they are less effective in identifying, recording and supporting consumers who need temporary support such as during an incident affecting their water supply.
- 2.2.4 Our research report "Customers' experiences of water supply interruptions following the freeze-thaw events of March 2018" highlights the need for companies to learn lessons from this incident and to implement improvements to how they prepare for and manage future incidents of this nature.
- 2.2.5 Our research also revealed that 93% of consumers who identified themselves as vulnerable did not receive the support they needed during the freeze/thaw incident and as such a focus on transient vulnerability would also be beneficial in your planned work.

2.3 Affordability

- 2.3.1 CCWater shares CAS' aim to ensure affordability help reaches those who need it. We would welcome the opportunity to continue collaborating and sharing good practice on

this issue when it is useful to do so. We are pleased CAS were able to join us at our affordability seminar in November 2018, and for your contribution on the day.

- 2.3.2 We note the plans to work with relevant agencies in encouraging an increased take-up of support. This is also an area of considerable focus for CCWater in our work with water companies in England and Wales. We will continue to share innovation and findings from our work with CAS and would really welcome any insights CAS is able to share from its own work going forward.

2.4 Strategic Review

- 2.4.1 We support the direction CAS is looking to take in the upcoming Strategic Review.
- 2.4.2 CCWater is currently representing consumers' interests in the 2019 Price Review in England and Wales and is following the same themes in our work, to help ensure the price determinations for 2020-25 form part of a longer term strategy to serve the interests and needs of current and future customers.
- 2.4.3 We particularly support the commitment to effective consumer engagement and ensuring that consumers' views influence decisions. Consumer engagement in the price setting issues has evolved considerably in the 2019 price review in England and Wales, with water companies rising to the challenge of both increasing customer input and (in many cases) using more innovative approaches to engage with customers. This can lead to a greater understanding of the sometimes diverse views and expectations of consumer groups. Ahead of SR21-27, CAS is welcome to engage with CCWater to look at good practice we have found that may help CAS achieve its objectives.
- 2.4.4 Collaboration with stakeholders is important in a price setting process. In England and Wales Customer Challenge Groups act as a platform for scrutiny and challenge of company proposals. While the Customer Forum acts as a similar platform in Scotland, CCWater can provide insight to the best practice used by Customer Challenge Groups in making effective challenges and ensuring consumers' views are gathered, interpreted and used appropriately in delivering business plans and longer term strategies.

2.5 Sewer Misuse and Misconnections

- 2.5.1 It could be useful for CAS to participate in the UK wide Misuse and misconnections campaigns. These are forums to share best practice in both areas and make a real difference on product labelling and pressing manufacturers and retailers to develop products that do not damage the sewerage system or the environment. Partnership working is key to these issues being addressed.

2.6 Third Party Intermediaries (TPI)

- 2.6.1 In England, many non-household water customers are switching with the help of TPIs. This includes smaller SME customers. CCWater has yet to see any significant evidence of poor behaviour by TPIs, although this may be due to the relatively low volumes of SME switchers.

- 2.6.2 We will continue to use intelligence from customer complaints and our research to monitor this. Upon signs of malpractice, we would agree with CAS that a sensible approach would be to look at Codes of Practice. To give such a code some ‘teeth’, it could put an onus on retailers to only work with credible TPIs through a condition of their license.
- 2.6.3 As we have done previously, we look forward to exploring the role of TPIs in the water market with CAS, particularly as some customers look to consolidate their retail services across the Scottish-English border.

2.7 What Consumers Expect

- 2.7.1 We are currently conducting consumer research in what consumers expect CCWater to be doing on their behalf. We would be happy to share the top line results at our joint consumer meeting in March if that would be helpful. As part of that research, we are seeing if we can identify some principles that consumers would want us to work by. We will compare the results to your Consumer Principles and will share the results with your Water Team.

3 Summary

- 3.1 In conclusion, we have insights we can share with CAS, and believe that by close working we can reduce detriment to water consumers across Scotland, Wales and England. We welcome the sharing of good practice to realise the practical benefits of cross-sector working in the interest of customers.

Please direct any queries to:

Andrew White
Senior Policy Manager
andrew.white@ccwater.org.uk