



Digital Economy Act, part 5: data sharing codes and regulations Consultation

Consumer Council for Water Response

November 2017

1 Introduction

- 1.1 The Consumer Council for Water (CCWater) is the statutory consumer organisation representing water and sewerage consumers in England and Wales. We have four regional committees in England and a committee for Wales.
- 1.2 CcWater is happy for our response to be published and attributed to the organisation.

2 Our response

- 2.1 Our research indicates that around 3 million households in England and Wales do not consider their water charges to be affordable. Since the introduction of water social tariffs we have been able to help the Industry achieve significant progress in identifying and getting help to those customers who need it. Overall around 400,000 customers are now receiving on-going support with their water bills. We believe that the sharing of data can help companies better identify those customers who might need this support, enabling assistance to be delivered to an even wider group. As such, subject to appropriate privacy safeguards, we are supportive of the implementation of the data sharing powers provided by the Digital Economy Act.
- 2.2 In our recent report [‘Staying Afloat - addressing customer vulnerability in the water sector’](#) we highlighted that the future capacity of social tariffs to deliver help to a larger group of customers will be dependent on access to greater funding. Currently schemes are mostly funded by customers and, as such, limited in scope based on how much they are willing to contribute through bills. We estimate that the schemes currently in place have potential to help around 600,000 customers over time. However this would still leave around 4/5ths of the problem unaddressed. We believe the issue of funding must be tackled if the potential benefits of the Digital Economy Act data sharing provisions are to be fully realised.
- 2.3 Our report also highlighted the potential benefits of a more standardised approach to delivering affordability assistance, so that help is available to all that need it no matter where they live. In particular we highlighted that a social tariff design based upon benefit entitlement and delivering fixed bill caps or discounts might enable companies to make use of data sharing provisions to apply automatic discounts to eligible customers’ bills without need for an application process.
- 2.4 We welcome the opportunity to comment on the Codes of Practice and regulations to implement the information sharing provisions of the Digital Economy Act. We have commented below against the relevant questions raised in the consultation.

Q1. Overall, do you find this Code of Practice clear and easy to understand?

Q2. Does the Code explain clearly the process for sharing information under these powers?

2.5 We consider the Code of Practice to be clear and easy to understand. It provides a framework which should enable benefits to be delivered for customers. However the delivery of those benefits will be dependent on effective implementation.

2.6 Co-operation between all relevant stakeholders will be essential in delivering this objective and we would welcome the prompt establishment of a working group to drive this work forward. We would wish to be included in those discussions to ensure customers' views are represented. Following such discussions further guidance may be necessary to ensure a clear understanding across all parties about how processes should be implemented.

Q3. Is there anything which you think is missing from the Code or which requires greater detail?

2.7 We feel it would be helpful for the Code to include a summary of the Government's policy objectives to encourage the effective implementation by stakeholders in accordance with those objectives. As the provisions of the Act facilitate data sharing, rather than requiring it, it would be helpful to reinforce the message that Government considers the sharing of information for these purposes to be beneficial and therefore it is to be encouraged.

Q19. Do you agree that the specified objective for water poverty has been described clearly and in the right level of detail?

2.8 We believe the specified objective for water poverty is clear and described in the right level of detail.

Q20. Are the lists of the specified persons able to share information under each specified objective appropriately targeted?

2.9 We consider that the list of specified persons is appropriately targeted.

Enquiries

Enquiries on this submission should be directed to:

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