



The voice for water consumers
Llais defnyddwyr dŵr

CCW's response to Consumer Scotland's Draft Work Programme 2024-2025

February 2024

Introduction

1. The Consumer Council for Water (CCW) is the statutory consumer organisation representing household and non-household water and sewerage consumers in England and Wales. We welcome the opportunity to comment on Consumer Scotland's Draft Work Programme 2024-25.

Our response

2. Our comments are limited to the questions where we feel we can usefully comment.

Are there any opportunities for collaboration that Consumer Scotland should consider in our approach to our proposed work streams for 2024-2025?

Sustainability

3. We have actively encouraged companies to produce Climate Adaptation Plans and to see these as a means of explaining the issues to their customers and providing reassurance that adaptation and mitigation measures are being put in place. Given the increasing occurrences of extreme weather events, it's important for water companies and other stakeholders to help people make the link between climate change and their water services and to encourage consumers to play their part.
4. We have also conducted research into customers views of the use of [nature based solutions](#) and are planning an online event in the Autumn to share best practice. We would be happy to extend the invite to Consumer Scotland.
5. We note your work on ensuring consumers are the centre of the transition to a sustainable water system. We are currently working with the companies in England and Wales on our [Leading the way: innovative behavioural change campaigns workstream](#). This work followed [research](#) we undertook to gain a better understanding of what successful campaigns have delivered and how to better engage consumers and inspire them to change their water and waste disposal habits. We have been working with a sub-set of companies who are conducting pilot projects utilising the best practice principles we identified. This is a collaborative effort to learn, share ideas, and make progress in addressing industry challenges in terms of achieving per capita consumption reduction targets and reducing blockages in the sewerage network. As part of this, we are supporting Waterwise and the Environment Agency in the creation of a Project Evaluation Toolkit

for water-saving campaigns. We would be happy to engage with you further on this work if that would be helpful.

Affordability

6. We also share your aim of ensuring that water charges are fair and affordable to customers, including those who are financially vulnerable. Through our [affordability review](#) and subsequent work we feel we have been able to achieve significant progress in this area which has helped provide protection to those struggling during the cost of living crisis. More than two million financially vulnerable households in England and Wales are now receiving financial support with their water bills. However significant challenges remain ahead and we would welcome working with in this area where sharing information, ideas and insights would be beneficial. We will ensure you are invited to relevant CCW events on this issue.

Vulnerability

7. Companies are required to publish initial vulnerability strategies by the end of June 2024. We will be working with companies as they develop these strategies and identifying areas for further potential for improvement. We will also be working with Ofwat as it develops specific standards for the operation of the priority services register. This may be an area of work which Consumer Scotland might find it useful to monitor and feed into. We would be happy to help facilitate this if that is the case.

A water sector shaped by the consumer experience

8. The programme includes a commitment to undertake a structured analysis of the experience of water consumers in the Scottish sector. This is welcome and it could also include a look at how well Scottish Water engages with its own customers and triangulates its sources of consumer evidence into its decision making processes.
9. Water companies in England and Wales used diverse methods of customer engagement in the development of their 2025-30 business plans. In 2024-25, we will evaluate the methods and influence of customer engagement by water companies to understand where customer engagement can be improved in future price setting reviews. We would value exchanging views on this.

10. At the same time we are relaunching our assessment process. This involves us reviewing a selection of complaints and debt cases to evaluate how well these were handled by a company. We also plan to introduce a new process to assess company management of operational incidents in terms of customer impact and communication. These assessment will provide additional insights on company performance.

A water market that works for non-domestic consumers

11. The proposed programme will look to introduce a Code of Practice for Licensed Providers in the non-household water sector. This is welcome. We are currently working with Ofwat as it proposes to strengthen the current protections for businesses in England, set out in the Customer Protection Code of Practice. This includes proposals to extend some protections to small businesses.

12. We have set out the areas where we want to see the code change to benefit businesses in our [Five Year Review of business customers' experience of the water retail market](#), published in March 2023.

13. There is an opportunity for us both to discuss potential barriers to good customer service and benefit delivery in the non-household market to help shape the development of their Code of Practice.

Are there any risks (e.g. duplication, practical barriers, others) that Consumer Scotland should be mindful of across any of our proposed workstreams for 2024-2025?

14. CCW published its [draft strategy and Forward Work Programme 20204-25](#) for consultation, in which there is some commonality with Consumer Scotland's focus on value for customers, support for vulnerable consumers and consumer behavioural change. There is also an overlap in public concerns about the water companies' performance with pollution from storm overflows in England and Scotland.

15. There is an additional risk of negative public perceptions of the water sector in Scotland due to financial performance of some water companies in England. Even if the impact or relevance of these issues is different in Scotland, it may lead to consumers having a negative perception. Consumer Scotland may need to be mindful of this.

Enquiries

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