



## **Watersure: CCW call for input**

Citizens Advice Cymru welcomes the CCW's call for input on the Watersure scheme. We recognise and welcome that there is a range of affordability support for water customers by their providers in Wales. As part of this, protection from high costs for people with water meters who are unable to reduce their usage (as currently provided through WaterSure) is vital.<sup>1</sup>

Our data shows that the most common reasons people come to us for advice on water are those that impact their household finances, with thousands of people in Wales coming to us for advice on issues relating to water affordability and debt each year. At a point when more households are finding it impossible to balance their budgets, ensuring that the support that is available for customers meets their needs is more important than ever.

### **Access to schemes**

The most common water-related issue that clients come to us for advice on is relating to support that is available to help with water bills, including Watersure and social tariffs. Since January this year, we have supported 5345 clients with advice on Watersure and other social tariffs, including helping people to apply for tariffs, informing clients of their eligibility for a tariff or helping them to process issues with their application or eligibility.

Compared to all our clients, people who come to us for advice on social tariffs and water debts since January are more likely to be disabled or have a long-term health condition, to be a social tenant and to be in single adult households, including single parents.

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<sup>1</sup> The rollout of smart meters from 2025, may be an opportunity to highlight support offered by the Watersure scheme, and also reduce some of the delays people can face in accessing a bill cap where having a meter fitted can pose a barrier. <https://www.dwrcymru.com/en/vulnerability-strategy>



*Comparing the demographic breakdown of all Citizens Advice clients in Wales, clients with water debts and clients who need advice on Watersure and other water tariffs.*

	<b>All clients</b>	<b>Water debts</b>	<b>Watersure and social tariffs</b>
% of clients who are disabled or have a long-term health condition	57%	75%	69%
% of clients who live in social housing	43%	67%	56%
% of clients who are single parents	25%	36%	32%
% of clients who are single adults	42%	46%	45%

We also see that people who we advise on social tariffs are also often dealing with debts or struggling to get by. 55% of the people who come to us for advice on Watersure or social tariffs also needed advice on dealing with water debt repayments and 65% needed advice on accessing crisis support.

When people come for advice on water debt, our advisers are often also able to consider their eligibility for support and can highlight where they may be entitled to more support. Many clients are unaware of the options available to them, despite being likely to qualify for help which can leave them struggling with high bills.

One example flagged by an advisor was of a single mother living in South Wales whose baby has a stoma which means that she has to do a lot of additional washing. She was struggling with higher water bills alongside other costs associated with taking her daughter to the hospital. She was unaware that she



would be entitled to Watersure until told by an adviser meaning she had been paying higher bills for some time.

Awareness and accessibility are often barriers to households who are eligible for support. In general we think that support should be offered proactively where possible in a timely manner, so for example people who fall behind on their bills are told about potential financial support and third party support organisations that can help.

In light of the latest changes to the Digital Economy Act, we also believe that greater use of data sharing will help to simplify access to support for people struggling to pay water bills.<sup>2</sup> We have previously outlined how customer journeys for people accessing support with essential services should be much simpler, and rely on sharing between government and providers, and between providers in different sectors where possible and in line with data protection rules.<sup>3</sup>

In their recent Vulnerability Strategy, we are pleased that Welsh Water has committed to 'work with [their] partners to identify opportunities for data sharing that allow [them] to proactively identify customers that need financial and non-financial extra help.'<sup>4</sup>

## Targeting support

In the cases of those we help with water debts, our advisers have noted that a range of circumstances can push households into debt, including a change in circumstances in relationships, health or employment, difficulty accessing or being unaware of tariffs/ support or high or unexpected costs.

Our advice services are seeing more people struggling to keep up with water bills. Since January, Citizens Advice has supported 3072 people in Wales with

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<sup>2</sup> [Data sharing across the public sector: the Digital Economy Act codes | ICO](#), Accessed September 2024

<sup>3</sup> [Citizens Advice response to CCW's independent review of affordability support for financially vulnerable water customers in England and Wales](#), December 2020

<sup>4</sup> [Vulnerability Strategy | Dŵr Cymru Welsh Water](#), 2024



water debt issues, a 32% increase from the same period in 2019. Protecting households from unaffordable bills is important. Households who are behind on their water bills can face difficulty repaying debts leaving them in debt for longer, threat of action from debt agencies, unaffordable deductions and ongoing problems keeping up with essential bills.

### *Income*

We know that households often face a steep 'cliff edge' if they are on a low income but are not eligible for means-tested benefits. As with our proposals around energy support, we believe that targeting households with high water use who are on lower incomes, not just those in receipt of means tested benefits, could help to reduce the cut off the pressure on more households.<sup>5</sup>

A recent example of a broader criteria being applied for low-income households in Wales is within the new iteration of the Warm Homes Programme. The Welsh Government has expanded eligibility for the scheme to those on means-tested benefits as well as those on a 'low income' (with an income lower than 60% of the median UK average in relation to household composition).<sup>6</sup> A similar threshold would reduce the cliff edge for households with high water use and a low income.

### *Medical conditions*

More than two thirds (69%) of the people we help with Watersure or other water social tariffs are disabled or have a long-term health condition. From the advice we provide on health and disability benefits, we know that people can struggle to obtain the necessary evidence of the impact of their condition to apply for support related to their health condition or be charged for documents from health care professionals.

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<sup>5</sup> [FINAL - Shock proof: breaking the cycle of energy crises](#), January 2024

<sup>6</sup> [Get free home energy efficiency improvements from Nest: Eligibility | GOV.WALES](#), Accessed September 2024



Where application processes are used for support schemes, we believe it's important these are simplified as much as possible in order to minimise the time and effort required for customers, and to improve uptake. This can also help third party advisers with limited time available to support clients to prioritise this type of support. Simplifications should include straightforward criteria that guarantee eligibility and require minimal information/evidence.

In relation to the medical eligibility criteria for Watersure, we believe that a broader statement that outlines the eligibility for the scheme, such as '*any physical or mental health condition which may result in the use of significant additional water usage,*' would help to indicate that other conditions would be included within eligibility criteria. However, to help with clarity, the existing, or amended, list of conditions could still be provided to give examples of qualifying conditions.