

Consumer Council for Water: WaterSure consultation response

About Mencap

Our vision is for the UK to be the best place in the world for people with a learning disability to live happy and healthy lives. We do this by supporting the 1.5 million people with a learning disability in the UK and their families, improving access to health and care services as well as education and employment. We directly support over 5,000 people with a learning disability to live their lives the way they want.

A learning disability is caused by the way the brain develops before, during or shortly after birth. It is always lifelong and affects intellectual and social development. Those people with a learning disability with eligible needs for care and support will therefore likely need to access support for their entire adult lives.

Summary

Since WaterSure was launched, there has been little change in either the eligibility criteria or the nature of the support which is provided to eligible households who have high essential water usage needs due to a large family or the presence of a medical condition in their household. Therefore, we welcome this review and would be keen to speak to CCW during this time.

CCW should recognise the disproportionately high extra water costs that people with a learning disability have and should recommend that regulations are changed so water companies add Personal Independence Payment, Disability Living Allowance and Attendance Allowance to their WaterSure eligibility criteria, alongside income-related benefits.

CCW also needs to work to ensure that Ofwat and water companies take steps to proactively increase the awareness amongst disabled customers of the extra help available to them. These steps must not be solely online based as people with a learning disability are far more likely to be digitally excluded.

Eligibility Criteria

Extend WaterSure's eligibility criteria to include people receiving disability benefits

Many people with a learning disability use significantly more water than non-disabled households; 43% of Mencap's Policy Shaper survey respondents said they had to pay higher energy or water bills because of their needs.¹ These range from needing to bathe more frequently or manage extra laundry, to needing constant fresh water as part of their medication because of specific health conditions.

[Parent of a child with profound and multiple learning disabilities] 'A lot of the time she needs to go in the bath for medical purposes and to help with her breathing, so she'll relax and hopefully cough... particularly when she's unwell and has something going on with her upper respiratory system. It's quite difficult at times, you could be in and out of the bath several times a day. That is something I had to think about – how am I going to afford this?'

Recent increases to utility costs have disproportionately impacted people with a learning disability due to their increased need, with many going without essentials to pay their bills. CCW's own research indicates that disabled

¹ Mencap, Policy Shaper Survey, December 2023.

households are significantly more likely to report that their water bills are unaffordable² and Joseph Rowntree Foundation analysis shows that 67% of low-income households with a person who has a learning disability were behind on at least one bill in May 2024.³

Despite this, currently only 2 water companies include Personal Independence Payment, Disability Living Allowance or Attendance Allowance in their WaterSure eligibility criteria. Compelling water companies to add Personal Independence Payment, Disability Living Allowance or Attendance Allowance to their WaterSure eligibility criteria, alongside income-related benefits, would expand the number of households eligible for this vital support and could help address a key extra cost that disabled households face. Failure to do so not only creates a post-code lottery of affordability support; it also fails to acknowledge the unavoidable extra water costs that these households face.

Whilst suppliers do offer support to people who have a medical need for water, this criterion is not well-known, evidenced by fact that only 33% of households with a disabled person are aware of the WaterSure scheme.⁴

Widening the number of households eligible for WaterSure protection would result in an associated increase in the cross-subsidy required through consumer bills to fund the scheme; Ofwat and CCW could explore the merits of an upper income threshold cap to mitigate the impact of this.

Many people with a learning disability who have high water needs (including children) are not the bill-payer for their households; instead, their parent or carer pays the household water bill. Although not named on the bill, the person with a learning disability's vital water needs will increase the bill of the household and as such, the *household* should benefit from WaterSure. Therefore, Watersure support should be expanded from the named account holders or bill payers and should be extended to instances where anyone in the household is in receipt of disability benefits.

Water companies must also ensure WaterSure eligibility information is more accessible, transparent, easily available on websites and well-known to customer services staff.

Medical conditions

WaterSure regulations currently name several conditions that qualify for support e.g abdominal stomas, renal failure, Crohn's disease and ulcerative colitis. They also require water companies to offer support in respect of any medical condition that requires specific additional usage. However, there can be confusion from people with a learning disability and their families about whether they are eligible for the scheme.

In our view, it would be helpful to remove the list of specific conditions and signal the fully inclusive scope of the regulations instead by stating that it is open to anybody with high water needs due to a physical disability, learning disability or mental health condition.

² CCW, Water Matters, 2022, <https://www.ccw.org.uk/publication/water-matters-2022/#:~:text=In%20the%20past%2C%20we%20have,be%20the%20case%20this%20year.>

³ Joseph Rowntree Foundation analysis of Savanta survey. Savanta surveyed 4,092 UK adults aged 18+ in households in the bottom 40% of equivalised household incomes online between 26th April and 9th May 2024. Data were weighted to be representative by age, gender, region, ethnicity and housing tenure. A full method note can be found as part of the briefing [The scale of the challenge: JRF's pre-election cost of living tracker | Joseph Rowntree Foundation](#)

⁴ Scope, <https://www.scope.org.uk/campaigns/research-policy/cost-of-living-report>

Support Provided

Affordability challenges can be partly mediated by good industry support; however, existing support is not commensurate with the needs of consumers; Scope research showed that only 47% of disabled people were satisfied with the communication from their water company.⁵ This figure is likely to be lower for people with a learning disability due to the accessibility and digital exclusion barriers they typically face.

All water companies must facilitate fully accessible customer service provision, including offline access to customer service teams to encourage people with a learning disability to contact them for support. Anyone who is eligible for Watersure should be automatically registered on the Priority Services Register so they can receive additional support. Water companies should also have a charity direct access telephone line, so third party providers can directly register people to seek support on their behalf.

⁵ Scope, <https://www.scope.org.uk/campaigns/research-policy/cost-of-living-report>