

## A Consumer Council for Water's Call for input – Improving the WaterSure Financial Support Scheme

### A response from Scope

September 2024

Scope welcomes the opportunity to respond to this Call for input<sup>1</sup>. The Consumer Council for Water (CCW) have launched it to seek views and suggestions on how the WaterSure scheme can be amended, in order to deliver better outcomes for customers.

#### Key points:

Scope's suggested changes to WaterSure:

- Eligibility criteria must be consistent across companies.
- Extend the criteria to include disability benefits, including Personal Independence Payment (PIP), Disability Living Allowance (DLA), and Attendance Allowance.
- Extend eligible conditions to include all disabled people of low income and high usage, based on the social model (focused on needs rather than specific diagnosis).
- All customer service staff should have disability awareness training including the disability social model, so that they understand the barriers and challenges that disabled people face. Discussions with customers should be based on needs instead of conditions.
- Considering cases where someone is not receiving benefits, or cannot provide a disability entitlement letter, but has a high usage of water because of their condition. An option would be to have developed a standard form which can be printed, or sent digitally to their GP practice for them to stamp and return free of charge.
- Companies must make the eligibility information very transparent and easily available on web pages and known to customer services staff.
- The eligibility for WaterSure should not be restricted to be for the bill payer, where there is disability in the household. Many disabled people (including children) won't be the bill payer for various reasons.
- We support CCW's option of extending the WaterSure scheme to unmetered customers whose charges don't vary with the amount of water they use, to enable more disabled people to be supported.

- Anyone who is eligible for Watersure should be invited to be registered on the PSR if they are not already. Automatic registrations should be put in place.
- Anyone on Watersure should automatically be provided with bottled water in an emergency.
- Companies should offer alternative accessible registration journeys for disabled people who do not receive any type of benefit. All water companies must facilitate fully accessible customer service provision, including offline access to customer service teams to encourage disabled people to contact for support.
- All companies should have a direct access telephone line, for third party service providers like Scope. This is to enable advisers to seek support on behalf of consenting customers struggling to get the help they need from their supplier.

## 1. About Scope:

We're Scope, the disability equality charity. We won't stop until we achieve a society where all disabled people enjoy equality and fairness, at home, at school, at work and in our communities.

We're a strong community of disabled and non-disabled people. We provide practical and emotional information and support when it's needed most. We use our collective power to change attitudes and end injustice.

We campaign relentlessly to create a fairer society. We won't stop until we achieve a society where all disabled people enjoy equality and fairness.

## 2. Context: Extra Costs

Life costs more if you are disabled. On average disabled households<sup>ii</sup> need an additional £975 a month<sup>iii</sup> to have the same standard of living as non-disabled households. This is even when accounting for benefit payments such as Personal Independence Payment (PIP).

The cost-of-living crisis and unaffordable households bills, is one of the biggest issues that disabled people are faced with right now. With energy bills still much higher than before the energy crisis hit, water bills set to increase,<sup>iv</sup> and spiralling debt, making the situation far worse.

Scope offers free energy and water advice to disabled people through our Disability Energy Support service (DES). We know from this service and from our research with our customer panel that vulnerable disabled people are particularly affected by higher costs associated with their water usage. Disabled people use more energy, but also use more water. Reasons for higher water usage include additional drinking water because of their condition, the need for sensory regulation, pain management, extra washing and multiple extra uses within the household.

Between 30 September 2022 and 30 September 2023, we analysed the data from 882 people who had an energy and water appointment with a DES adviser.

### 101 of these customers were in some level of water debt:

- In debt with water only: 39%
- In debt with water and gas: 8%
- In debt with water and electricity: 11%
- In debt with all three utility types: 43%

### 45 customers shared their water debt amount:

- £1 - £500: 47% were in this debt bracket.
- £501 – £1000: 24% were in this debt bracket.
- £1001 - £2000: 18% were in this debt bracket.
- £2001 - £7000: 11% were in this debt bracket.

38% of these customers had no repayment plan in place, and 39% were not on the water PSR.

### 21 customers rated their level of debt:

- Manageable debt: 57%
- Problem debt: 43%

Worryingly, 50% of Scope's DES customers in water debt earned or received less than the national living wage; this includes customers who work and those in receipt of disability and other benefits.

We have also analysed our DES data between February 2024 and July 2024 and the same time the previous year. The number of customers

coming to the service for energy and water advice, compared to the number of customers coming to DES just for energy advice in the same period in 2023, had increased by 244%.

Of those customers in debt with their utilities 50% had no repayment plan in place. These findings reflect how affordability issues and debt are worsening and becoming deeply entrenched amongst disabled people.

During 2022 Scope carried out research with our customer research panel to understand how people who need extra support can be identified and how they need supporting. The research discovered disabled households' experiences and feelings around WaterSure and social tariffs.

### **3. WaterSure Eligibility Criteria**

- The most common barrier to disabled households receiving help from their water supplier is qualifying under the eligibility criteria. Panellists told Scope that despite explaining their circumstances to their suppliers, many didn't receive any support and fell behind on their bills.
- Some people spoke positively of the WaterSure and discounted water tariffs, relating to income or disabilities but many others with similar needs were not eligible. Many people aren't on the 'right' benefits, or have the 'right' diagnoses.
- Many households fall through the gaps, so thinking about wider criteria and eligibility is essential.

Here are some anonymous quotes from disabled people who participated in our research:

“Refuse to put on fixed tariff or remove water meter as not on correct benefits. On average 4 loads of washing per day due to continence problems.”

“I told them that I have a medical condition that requires more water, I have fallen behind in my bills and they have ignored my cries for help”.

## Recommendations:

- The WaterSure tariff criteria should be extended to include disability benefits as evidence of need (for example, DLA, PIP, and Attendance Allowance).
- The WaterSure eligibility criteria should be consistent across suppliers and include disability benefits.

## 4. Medical Conditions

The medical criteria for being eligible for WaterSure is quite narrow and many find the process intrusive and uncomfortable when having to discuss their medical condition with a call centre agent. The focus should be on needs rather than specific conditions. Rather than having a list of illnesses as qualifying conditions, a suitable question to ask may be,

“Do you or a member of your household need to use more water due to a disability, health condition, impairment or access needs?”

Here are some anonymous quotes from disabled people who participated in our research:

“It’s very difficult to apply for the WaterSure tariff and they don’t account for long-term health conditions so I am constantly having to provide my son’s disabilities”.

“I know you can get special tariffs, if you’ve got skin conditions, medical conditions where it means you require more water. They are in my mind, a little bit restrictive, because for people like me that deal with pain by water, we’re not covered by that, but you know, I think sometimes they need to sort of, take into account other things that might be, they need to ask disabled people basically what we need, you know, what we use our water for.....”.

## Recommendations:

- Disabled people who require higher water use should be offered accessible routes to more easily evidence their needs. This should include proof of benefit entitlement or could be medical confirmation.

- Staff should be trained on the disability social model and to have the right conversations based on needs rather than medical conditions.
- If somebody can't provide a disability benefit entitlement letter or existing evidence which lists diagnoses or needs, then it would be appropriate for them to request a simple surgery stamped form. A generic form could be developed which can be printed or sent digitally to their GP practice for them to stamp and return.

### **5. Simplifying the Process:**

- Some have commented on the heavy bureaucratic burden they face as disabled people and expressed concerns about having an additional task of applying through a complicated process. This can prove to be a barrier on its own and result in them giving up on what they need to access.
- Many reported that simplifying the application process so they can be auto enrolled to receive help for WaterSure or a social tariff, would remove the additional barrier of having to repeatedly 'prove' their disabilities to qualify and receive discounts they are entitled to.

Here are some anonymous quotes from disabled people who participated in our research:

"It's not particularly things you want to explain to your water company, if I'm honest. But it's one of those things isn't it, it's part of being disabled unfortunately, kind of, people do ask for your personal medical information, and if you want access to those facilities you have to be open enough to tell them. ...Because everybody's got a level of comfort, haven't they, as to what they want to disclose or not, and just for me as a young female in my 20s talking to a chap on the phone about my incontinence wasn't very comfortable."

"I think that by having an application process again I think more vulnerable people would lose out the most, especially like, in terms of, for me energy is limited and there's only so much extra admin I can do because there already is a lot of extra day to day stuff to fill out."

### **Recommendations:**

- Disabled households to automatically be eligible if they are receiving benefits, rather than having to go through an administrative process, which would reach many disabled people who need it most.
- There should be options for disabled people not in receipt of benefits and a simplified process.

## 6. Making eligibility information transparent and easily available

- Companies should make the eligibility information very transparent and easily available on web pages or known to customer services staff, to stop putting people off applying, and avoid having to start the process to then find out they are not eligible. Many are currently web forms or pdfs which aren't accessible to many.
- It's also important that it shouldn't have to be the named account holder or bill payer in the household that's disabled to receive the tariff. Many disabled people (including children) won't be the bill payer for various reasons. "Because I'm not on the bill it's in my wife's name they won't offer any support."

### Recommendations:

- The requirements for companies should include making sure information is clear, written in plain English and accessible on all communication channels.
- Don't restrict the eligibility to be for the bill payer only.

## 7. Unmetered

- Some properties can't take a water meter and other people have very valid access concerns as well as cost concerns about moving to these. So, if a disabled person has water needs due to a condition, that shouldn't prohibit them from a discount if they can't or don't currently want a meter.

### Recommendation:

- We support CCW's option of extending the WaterSure scheme to unmetered customers whose charges don't vary with the amount of water they use, to enable more disabled people to be supported.

## 8. Automatic registration for wider other essential support

- We know from past research that a high number of disabled people are unaware of the Priority Services Register. (39% were unaware from our research carried out in 2023).

During recent quantitative research that we carried out with disabled panellists, some were aware and registered, others did not believe they were eligible or were not aware of it and the benefits.

In each case we asked what they require from their water supplier and would expect from being registered on the PSR. The responses were:

- better accessible communication
- regular updates during an incident
- faster help than other customers because of their condition
- additional practical support where there is a problem

For these reasons, we believe all disabled people eligible for the WaterSure tariff should be automatically enrolled onto the PSR so that they are more likely to receive the support they need, when they need it.

Panellists also gave the impacts that a disruption to supply would have on them. They shared the following:

- Being unable to take medication needed to stay well
- Being unable to use medical equipment that needs cleaning
- Being unable to leave the house if cannot wash themselves or equipment properly
- Being unable to maintain hygiene would be upsetting particularly with increased sweat or incontinence
- May not be well enough to work, due to not being able to maintain medication and infection control regimes
- Being unable to collect water or source it themselves due to mobility



As these are all profound impacts on disabled people's lives, we believe all disabled people who are eligible for WaterSure should be automatically eligible to receive priority support and be delivered bottled water in the event of an incident.

### Recommendations:

- Automatic registration for the Priority Services Register if eligible to receive the WaterSure tariff.
- Automatic registration for bottled water in instances where there is a disruption to supply.

### 9. Fully accessible customer service provision:

Through our customer service tracker, 650 disabled customers evaluated their utility suppliers over the April to September 2023 period. They told us how accessible the customer experience was and what happened during any interactions.

Three key themes were highlighted:

- **Customer service:** options, awareness and understanding of impacts for disabled households
- **Accessibility of communications and devices:** including website, apps, billing, leaflets, meters and routers
- **Social model support:** eligibility, adjustments and extra costs

Particularly on customer service, whilst there were some good experiences, these were the most commonly spoken about experiences:

- Lack of choice about contact methods
- Being passed between departments
- Having to explain access needs repeatedly
- Only basic understanding of disability
- Not understanding impacts of disruption or inaccessibility
- Staff confusion about the Priority Services Register

- Billing and payments often a surprise or produces challenges.

Also, through our DES service, we know many customers struggle to get through to their water suppliers because of the high demand. Many struggle to make themselves understood or find the process too challenging because of the many other day to day difficulties they experience dealing with their condition. In many instances, disabled customers would not get their queries dealt with or the support they need, if they did not have advisers from advocacy organisations such as Scope, ringing suppliers on their behalf or in support through a 3-way conversation.

### **Recommendations:**

- Customer service staff should be well trained in disability awareness and how to manage customers interactions sympathetically. Companies should provide fully accessible customer service provision, easy to contact and well staffed.
- All companies should provide a direct line for charities and outreach organisations to ensure that, with consent, they can act on behalf of disabled people.

### **Bill support provided**

Of the four options, Scope would prefer option two. Changing the cap to the local average or the industry average metered bill – depending on which is lower – would prove far more generous and ensure that Watersure is flexible depending on consumer needs.

Any of the four proposed options would be further strengthened with the support of a universal social tariff that has a fixed criteria. This fixed criteria would include disability benefits as standard.

While option two is our preference, we are mindful that Watersure entails a consumer cross-subsidy. We therefore call on CCW to assess the financial impact of all of the options for disabled billpayers missing out on support but still paying for it. This way it is easier to assess the relative merits of each option.

**For more information, please contact:**

[Redacted name, job title and email address]

---

<sup>i</sup> CCW Call for input (2024) <https://www.ccw.org.uk/publication/call-for-input-improving-the-watersure-financial-support-scheme/>

<sup>ii</sup> Defined as a household with at least one disabled adult or child.

<sup>iii</sup> Scope (2023), Disability Price Tag, <https://www.scope.org.uk/campaigns/extra-costs/disability-price-tag-2023/>

<sup>iv</sup> Ofwat investments to upgrade ad impacts on bills (July 2024) <https://www.ofwat.gov.uk/pr24-draft-determinations-press-notice/>