

**Consumer
Scotland**

Luchd-Cleachdaidh Alba

Draft Work Programme 2024-2025

For consultation

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1. Introduction – our vision for consumers

About Consumer Scotland

Our Purpose		
To improve outcomes for current and future consumers		
Our Ambition		
That every consumer can participate in a fair and sustainable economy, confident their needs and aspirations will be met		
Our Strategic Objectives		
To enhance understanding and awareness of consumer issues by strengthening the evidence base	To serve the needs and aspirations of current and future consumers by inspiring and influencing the public, private and third sectors	To enable the active participation of consumers in a fairer economy by improving access to information and support
Our Partnership Approach		
To collaborate with other organisations with interests and expertise in consumer issues		

Our Statutory Remit					
Functions					
Advocacy and advice	Representation	Research and investigation	Information	Recall of goods	Consumer Duty
Advocacy and advice					
Reducing harm to consumers	Increasing consumer confidence	Encouraging public bodies to address consumer matters	Promoting sustainable consumption	Advancing inclusion, prosperity and wellbeing	

Consumer Scotland was established in April 2022 as the new statutory, independent body for consumers in Scotland. We advocate on behalf of consumers and represent consumer interests. We are a Non-Ministerial Office, accountable to the Scottish Parliament.

Our Statutory Remit and our Purpose, Vision and Strategic Objectives are set out above.

We use data, research and analysis to inform our work on the key issues facing consumers in Scotland. In conjunction with that evidence base we seek a consumer perspective through the application of the consumer principles of access, choice, safety, information, fairness, representation, sustainability and redress.

In our 2023-2027 Strategic Plan we have identified three cross-cutting consumer challenges, which guide our work during this period:

- Affordability
- Climate change mitigation and adaptation
- Consumers in vulnerable circumstances

Our 2024-2025 Draft Work Programme sets out how Consumer Scotland will advance the interests of consumers in the forthcoming year across each of these strategic challenges.

We work across the private, public and third sectors. We are the levy-funded advocacy body for the electricity, gas, post and water sectors in Scotland. Our Draft Work Programme sets out our plans for 2024-2025 within these markets, as well as within the wider economy and across our statutory functions.

Working in partnership is at the heart of Consumer Scotland's approach. Chapter 4 of this Draft Work Programme describes the role we play across a range of functions to help convene activity across the consumer landscape in Scotland and promote collaboration.

The wellbeing of consumers impacts upon all aspects of Scotland's National Performance Framework. When consumers are actively engaged in the economy and when consumer issues are understood and acted upon by policymakers, service providers, regulators and businesses then this makes a positive contribution across each of the National Outcomes. Our Draft Work Programme describes the contribution that Consumer Scotland will make to the achievement of the National Outcomes during 2024-2025.

Our work in the past year

The past year, Consumer Scotland's first full year of operation, has been a period of significant challenge for consumers across Scotland.

Consumer Scotland has sought to respond to these challenges, and we have worked, in collaboration with others, to help achieve positive, lasting change for consumers.

Affordability



The ongoing cost of living pressures experienced by consumers have been a core theme over our work during the past 12 months. We have produced new evidence on the specific affordability challenges being experienced by consumers in the energy, post and water sectors, as well as in the economy at large. We have also published new analysis on the impact of high inflation for consumers, highlighting the differing impacts for different groups. We have shared our findings with policymakers, businesses and regulators and have recommended a range of actions, including support for specific groups, to mitigate the impact of the crisis for consumers.

We set out proposals to support energy consumers with their bills during the winter period and made a number of proposals on the strategy for tackling fuel poverty in Scotland, including actions on energy efficiency and the monitoring of outcomes. We contributed to the regulator's review of the safeguarding price cap on second class postage stamps, and we highlighted the importance of addressing affordability problems as part of the upcoming strategic review of water charges in Scotland.

We have worked in partnership with others to seek new solutions to the problems that consumers are facing in paying for goods and services. We hosted a joint event with the UK Regulators Network which brought together representatives from government, social policy, regulators, advice agencies and charities to consider new interventions or partnerships on this issue. We contributed to three Scottish Government Ministerial Working Groups on how to tackle the impact of high energy prices for rural consumers, non-domestic customers and consumers in vulnerable circumstances. We are subsequently convening a new working group to examine the particular challenges being experienced by off-grid fuel consumers in Scotland, including the price of their energy. We have participated in a range of market-specific initiatives to address cost of living issues, including work led by the Competition and Markets Authority on grocery prices.

Climate change adaptation and mitigation



Action to support a consumer-focused approach in Scotland to climate change adaptation and mitigation has been a major theme of our work in the past year.

We published our first cross-market tracker survey examining consumer attitudes and behaviours in the transition to net zero across a broad set of issues. We commissioned or published new research outputs on consumers' views on how to adapt to climate change in the water industry and in the postal market. We have begun deep dive research into consumers' experiences of purchasing new low carbon technologies, specifically heat pumps and solar photovoltaics (PVs). Our research outputs also

included a new study looking at how consumers can be supported to improve the efficient use of water in domestic settings.

We were pleased to provide both written and oral evidence to the Scottish Parliament on the Circular Economy Bill, in which we highlighted the importance of a strategic approach and the need for the provision of good quality information to consumers. Delivering on our partnership approach, we co-hosted an event with the Competition and Markets Authority, bringing together key stakeholders to examine the journey to net zero for consumers and to identify priorities for action.

Consumers in vulnerable circumstances



The cost of living crisis has not impacted on all consumers equally and we have undertaken work during the past year on specific issues being experienced by different groups of consumers in vulnerable circumstances.

We have worked in collaboration with disability charities and disabled consumers to understand the particular pressures on energy bills for some disabled consumers. We will be putting forward recommendations to tackle this issue. We are engaging with third sector organisations to examine how to improve access to postal deliveries, which can be a crucial, lifeline service for consumers of no fixed abode. Also in the postal market, we have produced new evidence on consumers' expectations for the universal postal service, including analysis of the importance of this service for specific consumer groups. We have published analysis, and a package of recommendations, on the ongoing process of switching to internet telephony services across Scotland and the particular risks this presents for some consumer groups.

We have undertaken work, including the forthcoming publication of new research findings, on the legislation to improve the regulation of the legal profession, which is currently passing through the Scottish Parliament. We have highlighted the inherent vulnerability of all consumers of legal services and made a series of recommendations to improve the legislation to better protect consumers, including for example in relation to the publication of data on complaints. We were pleased to give evidence on this issue in Parliament.

The rapid developments in digital technology bring a range of opportunities and risks for all consumers, although these are often most acute for those in vulnerable circumstances. We provided both written and oral evidence to the UK Parliament on the Digital Markets Competition and Consumers Bill. We are working in partnership with organisations across the consumer landscape, through the Consumer Network, to consider the differing impacts of technological changes for consumers in vulnerable circumstances.

Underpinning these activities we have carried out system-level work to ensure that we adopt a thoughtful, comprehensive understanding of the full range of issues facing consumers in vulnerable circumstances. We published a literature review on this topic during the year and established a new Advisory Committee to provide additional insight and constructive challenge on our work. The Committee provides advice on

how Consumer Scotland fulfils its statutory responsibilities regarding consumers in vulnerable circumstances.

2. Consumers in Scotland in 2024-2025

Consumers in 2024 face an array of challenges. A prolonged period of high inflation has stretched budgets and reduced the affordability of many essential services. Price volatility has combined with development of pricing practices that can make it more difficult for consumers to compare prices and assess whether they are getting a fair deal. And in some markets, the combination of technological change and a lack of information and advice can make it difficult for consumers to know whether they are making the right decisions – either for themselves or for society as a whole.

Over the coming years consumers will see services change as they become ‘smart’ and lower carbon, driven by digitisation and the journey to net zero. In response consumers will need to change their behaviours, including the way they engage with markets and services and in the actions they take in their homes, such as retrofitting new low carbon heating technologies. As markets evolve so too must regulatory protections to ensure that opportunities for innovation are maximised and that nobody is left behind in the transition.

The high inflation of 2022 and 2023 continues to ease, but many of the pressures and challenges that it created have not gone away. The cost-of-living crisis is evolving rather than disappearing. Housing costs continue to rise. And whilst inflation has slowed the price of many essentials remains much higher in real terms than before the start of the cost of living crisis in 2022. Acute affordability challenges have become enduring strains on household budgets. Their impacts include rising debt for low income and vulnerable consumers in particular, which has a further ongoing impact on household budgets and on mental health.

The wider cost of living challenges continue to place a spotlight on questions of tariff structure in regulated markets like energy, telecoms, and water and sewerage. A number of similar challenges arise across these markets. These often relate to the question of how to spread the costs of big infrastructure investments across different consumers.

This question can be considered at a point in time. For example, to what extent should some customers’ bills be subsidised by others and how should infrastructure costs be recouped through fixed charges that are unrelated to the amount of a service that is ‘consumed’, as opposed to variable charges? These are live questions in water and energy markets in particular.

But the question can also be considered over time – to what extent should consumers today contribute to the funding of the infrastructure investments needed in future. Issues of intergenerational equity between consumers are also at the heart of the transition to net zero. Governments have set out a range of aspirational targets. To meet these, new legislation and new policies are emerging on a regular basis. Many of

these have a direct bearing on consumer choices and the costs of particular goods and services over coming decades.

Consumer Scotland's research in 2023 showed that consumers want to be part of the solution to the climate crisis. But it also showed that consumers expect to see a more proactive steer from government and regulators, and that they need better access to trustworthy and reliable information and advice.

It is not just in relation to the net zero transition that issues of trust and transparency arise. Recent years have seen growth in a variety of practices, across several markets, that can make it more difficult for consumers to assess their choices. These often involve varying prices across different groups of consumers or across time in ways that may discriminate unfairly against consumers.

The issues here include 'drip pricing', where the final price a consumer pays differs substantially from the one they were initially quoted; dynamic pricing, where quoted prices can be very volatile over time; and the use of loyalty cards to discriminate between consumers in potentially unfair ways. These practices can sometimes benefit consumers, but this is not always the case. The practices are becoming more widespread with advances in technology, and new legislation aims to mitigate the major risks.

Consumers therefore face a wide range of challenges in 2024. Of course these challenges are not necessarily faced to the same extent by different consumers. Low income, ill-health, disability, geographic location and a range of other vulnerable circumstances, can all affect consumers' resilience to change, their ability to navigate their options, and their capacity to respond to new opportunities. Everyone is a consumer, but not all consumers are the same.

3. Draft Work Programme 2024-2025

Overview – delivering outcomes for consumers

A strategic approach to change – now and for the future

Our work is focused on improving outcomes for consumers in Scotland. Each of the workstreams set out in our Draft Work Programme has a defined outcome that it will contribute towards for the benefit of consumers. These outcomes support progress towards Consumer Scotland's overall Strategic Ambition and Purpose.

Many of the outcomes that we aim to support will require significant, long-term action by policymakers, businesses, service providers and regulators to deliver positive outcomes for consumers. This includes work in relation to major strategic issues such as:

- the funding models for investment in key infrastructure
- the design of charging or tariff systems in different markets
- the systems of regulation which support and protect consumers
- the opportunities for improved collaboration across markets, to create a more cohesive environment for consumers in Scotland

An ambitious, strategic approach is required in order to tackle deep-rooted challenges facing consumers in Scotland and bring about positive, sustainable change across different markets. The nature of this work means that some of the outcomes that we seek may take a number of years to achieve. Our Draft Work Programme describes the specific contribution that Consumer Scotland will make to help achieve progress on these issues during 2024-2025.

Alongside this work to achieve long-term change, a number of our areas of activity will prioritise the changes that need to happen now, to tackle issues of detriment or opportunity for consumers. This includes work on:

- the affordability of essential goods and services
- consumer access to vital markets
- the standards of service experienced by consumers

Across all of our Work Programme, Consumer Scotland will make our specific contribution to the process of change. This includes our robust evidence base,

insightful analysis, the strategic application of an overarching set of consumer principles, clear recommendations for action and the opportunity to coordinate actors across the consumer landscape.

The process of achieving better outcomes for consumers requires the involvement of a wide range of organisations. This includes national and local governments, regulators, other public bodies, businesses, service providers, enforcement bodies, advice agencies, representative bodies and charities. Each of these has their own important contribution to make. Consumer Scotland will collaborate with these partners and with others from across the public, private and third sectors in all of the work we undertake. This collaboration includes our convening of the Consumer Network, the Energy Consumers Network and the Advisory Committee on Consumers in Vulnerable Circumstances, all of which will continue to work closely with during 2024-2025.

Connecting themes

Each of the workstreams in our Draft Work Programme addresses at least one of Consumer Scotland's three-cross cutting themes:

- Affordability
- Climate change mitigation and adaptation
- Consumers in vulnerable circumstances

We indicate for each workstream the specific theme or themes that the activity contributes towards.

Alongside our work to achieve improvements for consumers through individual workstreams, we will draw learning and connections on our three cross-cutting themes from across the Consumer Scotland Work Programme. Through this strategic, cross-market approach we will seek to identify further opportunities to improve outcomes for consumers.

Our approach will include developing our convening role, as the statutory, cross-market consumer advocacy organisation for Scotland, to connect policymakers and businesses from different sectors to work in a more coherent way, focused on consumers. We will identify best practice that can be shared between services and markets and provide this insight to key stakeholders. We will use our analysis to promote the opportunities offered by a joined up, consumer-focused ethos, while highlighting the limitations of a more siloed approach.

Connecting our ways of working

Consumer Scotland will work in a joined up way across our own functions and tools to achieve positive outcomes for consumers.

Our work is underpinned by high quality research and analysis, which provides the foundation for our policy and advocacy activity. Our policy advice also draws on an internationally recognised set of consumer principles, supported by evidence, and is

focused on identifying the changes that are required to take advantage of the opportunities available to consumers and to tackle consumer harm.

We are establishing our functions and activities to undertake investigations, to provide guidance that supports the implementation of the Consumer Duty for public bodies in Scotland, and to support the effective recall of goods in Scotland.

Across our work, we will consider the range of skills, tools and powers at our disposal and select the most appropriate mix for each issue. As a learning organisation, we will share good practice and lessons learned across our organisation, to ensure that we work in a coherent, focused way that delivers impact for consumers.

Managing our resources and capacity effectively

The workstreams set out in our Draft Work Programme represent a range of activities of differing size, scale and intensity. Many of the planned workstreams follow on from work undertaken by Consumer Scotland in previous years and many will continue beyond 2024-2025.

We are a team of around 35 staff, and it will not be possible for us to engage in multiple activities in all of our workstream areas. Some of the workstreams in this Work Programme represent substantial pieces of work, with a number of different components. Others are more discrete, and time bound. Our resources are finite, and we will have to make choices during the year about how to prioritise our interventions in order to achieve impact for consumers. We will use our prioritisation questions, which are provided in Appendix A, to help us make these choices.

Alongside the workstreams set out in the Draft Work Programme, we will remain cognisant of emerging issues that present new opportunities or risks for consumers during the year. Where we choose to respond to these issues, informed by our prioritisation questions, we will make the necessary adjustments to our pre-planned activity to ensure we deliver positive outcomes for consumers.

Where we are unable to undertake substantive work on an emerging issue in 2024-2025 we will retain this issue in our planning pipeline for consideration in future years.

An overview of the workstreams in our Work Programme is shown in the following diagram.



Understanding the consumer experience

- Consumer issues - insight and analysis
- Using our investigative powers
- Strengthening the evidence base



Putting consumers at the centre of systems

- A net zero transition that delivers for consumers
- Fairer markets for all consumers
- Markets that deliver for small businesses
- Consumers at the heart of public services
- Better protection for consumers from product harm



Improving the way markets work for consumers

- A consumer-centred system for legal services
- A fairer rental market
- Public transport services that consumers choose
- A circular economy designed for and with consumers
- Regulations that deliver consumer outcomes



Making the energy market work for consumers

- A future retail market designed around consumers
- An energy system that serves rural consumers
- Improved access to and experience of low carbon technology
- Maximising the benefits for the energy transition
- A new system of heat network regulation that delivers
- Big energy savings network and 'Worried this Winter'



A connected, future-ready postal market

- A universal postal service that delivers for consumers
- An inclusive postal system for all consumers
- A transition to net zero post
- A consumer-focused Post Office network



A water sector ready for climate change

- Consumers at the centre of a sustainable water system
- Fair and affordable water charges
- A water market that works for non-domestic consumers
- A water sector shaped by consumers

Understanding the consumer experience



Overview

Robust evidence and insight into consumer harm and the potential policy responses to that harm is a foundational part of Consumer Scotland's activity. As such, our research, analysis and investigations directorate is critical to the delivery of our work programme.

Our research, analysis and investigations functions provide evidence and insight into issues such as:

- how consumers are affected by policy, the operation of markets, and wider economic circumstances
- consumers' perceptions of and attitudes to a wide range of issues and trends, and how these affect the outcome of policy
- how consumers change their behaviours in response to new information or circumstances – and the impact of this on consumer welfare and wider societal goals

Our research, analysis and investigations involve a wide variety of methods and approaches. We work extensively with existing statistical, economic, administrative, and research data to understand the experience of consumers in Scotland, examine issues in markets or practices which may cause harm to consumers and analyse policy options. We conduct and commission primary research with consumers, businesses and other stakeholders, ranging from large-scale surveys to focus groups, qualitative interviews and deliberative research. We also have statutory information gathering powers, which we can use to gather evidence on the issues affecting consumers in different markets or services.

Ultimately, the evidence from our research, analysis and investigations is what enables Consumer Scotland to deliver, alongside our partners, better outcomes for consumers.

Much of our research and analysis activity is undertaken as part of workstreams detailed in other parts of this work programme. We also take forward some of our core research and analysis activity as part of three specific workstreams – an ongoing programme of consumer welfare analysis, broader activity to build the evidence base, and specific investigations into potential consumer harm.

Consumer issues – insight and analysis



We will provide a programme of analysis, commentary and insight on a broad range of issues affecting consumers. This programme of work will continue throughout the year, with regular publication and dissemination of commentary and briefings. The topics covered will include a range of contemporary and emerging consumer issues

across a wide range of markets, including but not limited to our levy-funded markets of energy, post and water. Our aim throughout this work is to raise awareness of issues that are affecting consumers, and to stimulate and inform public debate about potential policy and regulatory responses to those issues.

Using our investigative powers



Where we discover credible intelligence of harm to consumers in particular sectors or as a result of particular practices we may choose to investigate using our formal powers. We may also use our investigative powers to examine opportunities for consumers in particular markets. Depending on the results, we will advocate for the best solutions to minimise the detriment and leverage better outcomes for consumers and fair dealing businesses.

In the year ahead we will begin our first investigation, following preliminary work in 2023-2024. The choice of investigation will be measured against agreed prioritisation principles and criteria. We will be as transparent as possible in our investigations process and aim to deliver outcomes and advice that are based on the best evidence achievable. In doing so, we will also liaise and work closely with our landscape enforcement and stakeholder partners to maximise fair outcomes for consumers. In that respect, alongside this Work Programme we are seeking stakeholder views in a separate consultation on our Investigations Prioritisation Criteria. [Consumer Scotland Investigations Prioritisation Criteria - Consultation](#)

Strengthening the evidence base



High-quality research and analysis require robust evidence. This workstream aims to improve the quality and quantity of evidence readily and regularly available to Consumer Scotland to inform all of our work. It is distinct from other workstreams in that it seeks to enable regular access to evidence that could benefit multiple workstreams, both now and in the future, rather than being specific to a particular topic or project. It will improve the "how" we do our work, rather than focusing on the "what".

Putting consumers at the centre of systems



Overview

People don't experience markets or services in isolation. In a single day, an individual is likely to come into contact with multiple businesses or service providers across the public, private or third sector. When they put on their heating, go to the shops, use the internet, visit the doctor, send their children to school, pay a bill, or take a bus or a train, people are acting as consumers. Yet each of the markets or services that they

might use to undertake these activities are structured differently – often radically so – requiring consumers to act in many different ways, in order to achieve the outcomes they are seeking.

As the cross-market consumer body in Scotland, with a role to represent those buying or using or receiving goods and services from businesses and the public sector, Consumer Scotland wants to put consumers at the centre of the system. We know there are significant issues that affect consumers across multiple settings. However, the way in which these different markets and services are organised does not always translate into a coherent, positive overall experience for consumers.

In 2024-2025 we will undertake a number of streams of work, which look strategically across markets to assess how well the current arrangements are working for consumers in Scotland. In doing so we will identify best practice and opportunities for sharing, learning and better coordination. Our cross-market work in 2024-2025 will focus on the following strategic consumer issues:

- The transition to net zero, and the different ways in which consumers are being engaged in this process
- The disadvantages being experienced by specific groups of consumers, across multiple markets or services, and the compound effect of this disadvantage
- The particular experiences of small businesses when they are buying or using goods and services
- The strategic decision-making process within public bodies and how the consumer interest can be more fully considered as part of that process
- The arrangements for recalling faulty goods and products in Scotland

A net zero transition that delivers for consumers



The Scottish Parliament has set ambitious, binding climate change targets which can only be met by sustained effort by government, industry, businesses and consumers.

Households, businesses and communities will need to make considerable changes to lifestyles, business practices, and consumption habits. The transition will need to be informed by the needs and priorities of consumers, including those in vulnerable circumstances, or on low incomes.

In 2024-2025 Consumer Scotland will analyse our developing evidence base around the consumer transition to net zero, identifying where consumer engagement or impacts differ amongst groups. We will advocate for effective, consumer-centred policy interventions that maximise participation, taking account of consumer needs today and in the future, so no one is left behind.

Fairer markets for all consumers



Consumer Scotland has particular regard to the interests of consumers who are at greater risk of harm or who have fewer or less favourable options than other consumers. In 2024-2025 we will build on the literature review on Consumers in Vulnerable Circumstances that we published last year.

We will particularly focus on whether some consumers in Scotland may experience compound disadvantage across multiple markets, due to their characteristics, or geographic location. We will consider whether markets for certain key essential services operate in different ways across the UK and whether this produces a cumulative effect which impacts on the experience of specific groups of consumers in Scotland.

Markets that deliver for small businesses



The definition of 'consumer' in the Consumer Scotland Act 2020 includes small businesses who purchase, use or receive goods or services. Small businesses often face similar challenges to individual consumers including accessibility, inequality of bargaining power and difficulty in securing effective redress. While the risks are similar, the way these issues can be experienced by small businesses can be different. The nature of the goods and services a small business consumer purchases or uses may also be different to those supplied to domestic consumers. There is a risk that the specific harms relating to small business could therefore be overlooked.

In 2024-2025 Consumer Scotland will seek to build understanding of the key consumer issues relating to small businesses in Scotland. Through this work we will identify priority areas to for policymakers to consider when assessing interventions that will deliver positive outcomes for small business consumers in Scotland.

Consumers at the heart of public services



Most public bodies in Scotland will be required to meet the consumer duty under the Consumer Scotland Act 2020 from 1 April 2024. This will require them to have regard to:

- the impact of their strategic decisions on consumers in Scotland
- the desirability of reducing harm to consumers in Scotland

In line with its statutory role under the Act, Consumer Scotland is currently developing draft guidance on how public bodies can meet the duty, with expert advice and input from an advisory group.

There will be a one year implementation period for the duty from 1 April 2024. This period is intended to allow time for public bodies to:

- work with Consumer Scotland in informing the final draft of the guidance by sharing their experience of using it when applying the duty
- experience implementing the duty, as not all public bodies will make strategic decisions on a regular basis

We will undertake further stakeholder engagement throughout 2024-2025 to finalise the guidance, including running a public consultation on the draft guidance. The final guidance will be published by 1 April 2025.

Better protection for consumers from product harm



The Consumer Scotland Act 2020 placed a duty on Consumer Scotland to operate, or secure the operation of, a publicly available database of recalls of goods in Scotland. Since the Consumer Scotland 2020 Act was passed, the Office of Product Safety and Standards (OPSS) launched a UK-wide product safety database in April 2022, the same month that Consumer Scotland came into existence.

Consumer Scotland and OPSS are working together to develop an action plan that will help ensure the OPSS operated database meets the duty placed on Consumer Scotland and to identify opportunities to further enhance impact for consumers in Scotland.

Improving the way markets work for consumers



Overview

There are pressing concerns around consumer access to vital goods and services. The cost of living crisis has impacted on consumers in different ways, and some are struggling with affordability issues. Consumers have seen sharp rises in prices of household costs across a number of markets in the past two years, including food, housing and mobile and broadband services.

Our markets must work to ensure that consumers can access goods and services that meet their needs, both now and in the future. This future aspect is especially relevant as we continue to adapt our ways of living and working as we make the transition to net zero.

In 2024-2025 Consumer Scotland will take a strategic approach across a number of important consumer markets, seeking to identify what consumers need and advocating for changes that deliver improved consumer outcomes. We will input into the parliamentary process and the implementation of framework legislation on legal services, housing and digital markets. We will identify how consumers can play a role in reducing consumption and getting the maximum use from our natural resources,

contributing to the development of a circular economy. And we will look at what factors promote or inhibit the use of public transport, which must be accessible and affordable for all, especially if it is to help us achieve our net zero targets. We will continue to monitor developments across other markets responding where there are opportunities to bring about positive change for consumers in Scotland.

A consumer-centred system for legal services



A Bill reforming legal regulation is currently being considered by the Scottish Parliament and this addresses important public interest issues around transparency, accountability and redress for consumers.

Access to legal services can help consumers navigate legal processes, exercise their rights and obtain redress. However, legal services are often purchased in distressing and stressful circumstances, raising important issues around consumer vulnerability and the risk of detriment. It is important that there is a strong regulatory framework to ensure the legal services market meets the needs of consumers and that there is a clear, evidence-based consumer voice at the heart of the design process.

Consumer Scotland has engaged in the legislative process on the reform of the regulatory framework during the past year and we will continue this work in 2024-2025. This will include highlighting new research evidence on consumers' attitudes and experiences, to advocate for a reformed system that delivers for consumers.

A fairer rental market



Ensuring fair and affordable access to rented housing is a key issue for consumers in Scotland. As a new area of work for Consumer Scotland in 2024-2025 we will conduct an initial review of the existing evidence base to identify gaps in knowledge and consider what issues are of most concern for consumers.

We will work in partnership with key stakeholders to help inform the policy responses to these concerns, such as the planned Housing Bill, to put the needs and interests of consumers in Scotland at the centre of these interventions.

Public transport services that consumers choose



In the journey to net zero it is important that public transport is affordable, accessible and convenient for consumers. This is a new area of work for Consumer Scotland and in 2024-2025 and we will undertake scoping work to understand public transport usage in Scotland, seeking to identify ways consumers can be encouraged to reduce car kilometres.

We will seek to influence key emerging policies, such as the Fair Fares review and climate change sector plans for transport. We will provide initial recommendations to improve the consumer experience of the public transport system, while highlighting barriers inhibiting public transport usage. Based on these activities we will assess future research needs.

A circular economy designed for and with consumers



The Circular Economy Bill is currently before the Scottish Parliament and it proposes the development of a circular economy strategy, targets and a number of measures to facilitate better, more efficient use of our resources.

Our research shows significant scope for action to improve consumer understanding of and engagement with such policies; there are opportunities to support consumers to identify and take actions that reduce consumption and maximise use of our resources, moving further up the waste hierarchy and making the choices that will help us meet our ambitious net zero targets.

We will continue to engage with the development and implementation of the Bill in 2024-2025 to provide a consumer perspective on the key provisions.

Regulations that deliver consumer outcomes



During 2024-2025 we anticipate that proposed changes to regulatory frameworks in a number of markets will have impact on consumers in Scotland. This includes digital markets and competition, consumer protection and reform of regulatory policy including retained EU laws.

We will use our expertise and our evidence base to advocate for better consumer outcomes and identify measures which can be put in place to reduce risks of consumer harm. This may include stakeholder engagement, publishing briefings or contributing to regulatory policy or parliamentary consultations. We will aim to ensure regulators, governments and others consider the needs and aspirations of consumers in Scotland when developing policy and regulatory measures.

Making the energy market work for consumers



Overview

Energy bills are slightly lower than they were this time last year, but they continue to impose substantial affordability challenges on many households. High energy costs also contribute to negative impacts on health and wellbeing. Our energy tracker survey – which surveyed 1,500 Scottish households during October 2023 found that 30% of households are finding it difficult to keep up with their energy bills. Strikingly, 43% of

respondents are finding it more difficult to keep up with their bills now compared to this time last year.

Short-term interventions to alleviate affordability challenges must be balanced with the need for longer term reforms to ensure the GB energy market effectively enables the transition to net zero. Since forming, Consumer Scotland has undertaken a range of activity advocating for fairer terms for consumers in Scotland in the energy sector. We have sought to mitigate the impact of the energy crisis on consumers, advocate for a fair and just transition to net zero and make the case for greater support for consumers who are not effectively catered for by current policy and regulatory frameworks or market arrangements.

In 2024-2025 we will continue to:

- develop our understanding of the experiences of energy consumers in Scotland and gather data to strengthen our evidence base
- secure improvements for consumers through partnership projects and influencing policy makers and the wider energy industry
- identify the conditions necessary to enable consumers in Scotland to benefit from evolving energy products and services as we move towards net zero targets
- influence the regulation and practices of the energy industry to be more consumer-centric
- advocate for fairness in ongoing market reform and future investment

We will use our insight and evidence to build a stronger picture of consumer needs across markets and to start to place a sharper focus on influencing longer-term, strategic and structural reforms which have the potential to realise substantial consumer benefits.

The energy market is complex and fast-moving. It will not be possible for Consumer Scotland to engage with all policy or regulatory issues relating to the workstreams in our Work Programme. We will make clear choices during the year about how to focus our work in relation to each of the areas described below, to maximise the value and impact of our work.

We will continue to convene the Energy Consumers Network in 2024-2025. This important collaboration with other consumer organisations working on energy issues in Scotland will help to inform our work across the energy market. We will also work closely with other consumer bodies, including Citizens Advice, to provide insight into the key issues for consumers in Scotland so that these can be considered in GB-wide activity.

A future retail market designed around consumers



The retail energy market remains in a state of continual structural and policy change which regularly exposes a range of consumer challenges, requiring the wider industry to respond at pace. Energy prices remain 50% higher than in 2021. Alongside these high costs, the transition to a low-carbon energy system will change the way that energy markets operate and how households and businesses access energy products and services. In 2024-2025 Consumer Scotland will:

- Provide insight and evidence on the key issues for consumers in Scotland into significant developments in the energy sector through engagement with industry and decision-makers through working groups and consultations
- Utilise our growing evidence base to advocate for better targeted support across short-term interventions and longer-term reform
- Work to further identify how the needs of consumers in Scotland can be placed at the centre of future markets
- Continue to track the experience of energy consumers in Scotland through our regular tracker survey

An energy system that serves rural consumers



Consumers living in rural parts of Scotland are more likely to be in fuel poverty compared to those in urban areas. Energy and fuel costs also tend to be higher in rural areas. Consumer Scotland will continue to facilitate our expert working group, which examines the challenges facing rural and remote consumers as they heat and decarbonise their homes. The group will take forward work that will provide valuable insights on the challenges and opportunities faced by consumers in rural and remote settings.

We will use this emerging evidence to contribute to policy development and implementation through the provision of briefings, consultation responses and stakeholder engagement.

Improved access to and experience of low carbon technology for all consumers



It is important that energy efficiency policy in Scotland is informed by an understanding of consumer awareness of low carbon technologies and the barriers that consumers can experience in adopting them. Consumer Scotland will continue to apply our evidence base on the experiences of consumers adopting low carbon technologies, including heat pumps, solar PV, and electric vehicles. We will use this evidence to ensure that the development of policy for emerging low carbon tech is

built on a clear understanding of the challenges and opportunities facing consumers in Scotland.

We will also continue our work supporting the implementation of Scotland's energy efficiency regulations to ensure that they reflect the consumer perspective and work to incentivise owners and tenants to adopt zero direct emissions heating systems.

Maximising the benefits of the energy transition for consumers



Repowering Britain will be an essential enabler of governments' net zero ambitions, providing clean, green energy for heating, power, and transportation, and opportunities to re-imagine how markets and policy can work in tandem to deliver fair and affordable energy for all.

Over the next few years, Consumer Scotland will undertake work to support the transformation of the energy system in Great Britain in ways which maximise the benefits to consumers in Scotland. In 2024-2025 we will work with stakeholders to explore opportunities to empower communities as active and engaged participants in the energy transition, to deliver greater value for consumers through market reform, innovation, and improved whole system co-ordination and planning.

A new system of heat network regulation that delivers for consumers



Heat networks have the potential to bring many benefits to consumers as a cost-effective, low carbon method of heating. However, there is a strong evidence base on the harm that can be experienced by consumers of heat networks. The introduction of new regulation will play an important role in addressing and preventing these harms. Consumer Scotland will take on a new role as the statutory consumer advocate for heat network consumers in Scotland in the new regulatory regime. As part of this new responsibility Consumer Scotland will gather information on the issues and experiences heat network users face, using this evidence to advocate on behalf of consumers. It will also mean formally representing consumers on industry and advisory groups, ensuring the consumer perspective is incorporated at all stages of decision making.

There is a significant amount of scoping required to prepare for this role, which we will begin once Consumer Scotland has been fully resourced to take on this new function. In 2024-2025 we will begin to undertake this work, exploring how we can deliver this new role for heat networks consumers working across the consumer landscape in Scotland.

Big Energy Savings Network and Worried This Winter campaign



People need support and access to advice services. In 2024-2025, Consumer Scotland will continue to work in partnership with Citizens Advice Scotland to deliver support

directly to consumers through the Big Energy Savings Network (BESN) project and the Worried This Winter campaign. Both programmes are delivered in communities across Scotland by Citizens Advice Bureaux and other third-sector partners. BESN trains advisers to deliver vital energy advocacy services to individuals and in group settings, while Worried This Winter provides energy and cost-saving advice in the coldest months.

A connected future-ready postal market



Overview

Postal services, including the letters and parcels markets, can play a vital role in connecting consumers in Scotland to a wide range of markets and services, as well as to each other. These services are often particularly important for those consumers who, for a variety of reasons, may have limited use of digital technologies.

The way in which consumers engage with postal services is changing, with letter volumes decreasing while parcel numbers are rising. At the same time, there remain some consumers for whom using postal services can be challenging, for reasons of access or affordability. There are also concerns over the quality of service that consumers can experience when using some postal services. Looking to the medium-term, there is a need for the postal sector to reduce its carbon footprint, as part of the wider economic journey to net zero.

All of these issues have implications for how consumers in Scotland experience postal services now and in the future. In 2024-2025 Consumer Scotland will work with the regulator, the industry, Citizens Advice, the Consumer Council for Northern Ireland and other consumer bodies to avoid any duplication of activity and ensure that we deliver added value. Through our work will seek to put the interests of consumers in Scotland at the heart of decisions about the future of the UK postal markets and identify practical solutions to help deliver improved consumer outcomes.

A universal postal service that delivers for consumers now and in the future



It has been over a decade since the Postal Services Act set out the current legislative framework of the Universal Postal Service in the UK. Since that time there have been significant changes in user needs from postal services across the UK.

Recognising these changes, Ofcom is considering potential options for the future of the Universal Postal Service. Consumer Scotland has undertaken early engagement with Ofcom and Royal Mail in this process to provide an initial perspective on key issues for consumers in Scotland. In 2024-2025 we will continue to engage Ofcom, Royal Mail

and the UK Government on the reformation of the Universal Postal Service to ensure any changes meet the needs of current and future consumers.

We will provide analysis, insight and recommendations on what consumers in Scotland might need from the postal services sector in the long-term, to encourage future proofing of the legislative framework, taking account of long-term changes needed across the postal market, such as decarbonisation. We will also provide recommendations to influence the implementation of rigorous safeguards to ensure that all consumers are able to benefit from a high quality postal service.

An inclusive postal system for all consumers



Consumers without fixed addresses, such as those experiencing homelessness, fleeing their homes, or those who are part of the Gypsy, Roma and Traveller communities, face significant challenges in accessing essential services. Receiving letters for NHS appointments, accessing mobile contracts, or getting financial aid can be extremely difficult without a postal address.

We will undertake work to build on our existing understanding of the challenges the impacted communities are experiencing, gathering evidence of solutions that could work for the different groups impacted by exclusion. We will continue to engage government, regulators, industry, public bodies, civil society and other consumer advocacy bodies on the options for change to support those impacted. We will take a practical, solutions-focused approach, which builds on existing work in this field, and which recognises commonalities across the UK as well as the specific landscape for consumers in Scotland.

A transition to net zero post with consumers at the centre



The UK parcels market has grown significantly in the last decade. There is little consistency in the measurement of emissions in this market and in the information that is provided to consumers, while the transport industry has struggled to reduce its emissions in supporting the growing market, with significant reliance remaining on heavy emission road freight.

In the past year, Consumer Scotland has commissioned qualitative research with consumers, including small businesses, on their attitudes to decarbonisation of the postal sector. We have explored consumers' attitudes towards the changes that might be required to reduce the carbon emissions in this market. This new research will allow us to engage with the industry on the needs of consumers, particularly as the market continues to develop and grow, and provides the foundations of an evidence base for Consumer Scotland's advocacy activity.

In 2024-2025 we will follow up on the research we commissioned, building understanding of the issues that the research found and providing recommendations for change that will benefit consumers now and in the future.

A consumer-focused Post Office network



The Post Office network provides access to a range of essential services for consumers across Scotland. Many branches now serve as financial services hubs for communities, while also providing their traditional role in offering postal services.

For rural and remote consumers, including small businesses, the role of the Post Office is central to their communities. Consumer Scotland will continue to examine the delivery of the network and whether it is meeting the needs of consumers in Scotland. We will carry out regular analysis of Post Office data, enhancing the evidence base on the current and future needs of consumers.

A water sector ready for climate adaptation and mitigation



Overview

The water sector is at the frontline of climate change mitigation and adaptation in Scotland. Issues of infrastructure investment and management, consumer behaviour and expectations, flooding, water scarcity and water quality are central to policy and regulatory decisions about how Scotland's water sector adjusts to the changes in our climate. Each of these issues presents a range of potential impacts for consumers.

Alongside these considerations, many consumers in Scotland are experiencing significant pressures on their household budgets. The funding mechanisms which underpin the investment that the sector requires to be ready for the future are of significant importance to consumers, in terms of the affordability of water charges. This has implications for consumers both today and in the future.

In the non-domestic water market, there are questions as to how to ensure that consumers achieve high quality services, with new interventions being developed to support this.

In 2024-2025 Consumer Scotland will engage in the key strategic, regulatory and policy processes which will be taking place to advance these major issues. We will develop and apply our evidence base to provide insightful analysis and recommendations to these processes and ensure that the consumer perspective is at the centre of decisions about the future landscape.

Consumers at the centre of the transition to a sustainable water system



There is a need for the water industry in Scotland to adapt to the challenges posed by climate change. In the past year we carried out deliberative research with consumers to develop our evidence base around how domestic consumers can and should be part of Scotland's transition to a more sustainable and resilient water sector. We will build on this research during 2024-2025 and use the findings to put the consumer voice at the heart of sector discussions.

Our work in this area closely aligns with the policy development review of the water industry, led by the Scottish Government. We will identify opportunities for advocating for consumers' needs as this review progresses. We will give particular attention to consumer support for policy options, the acceptable pace of change, how solutions can be fairly paid for and how risk of consumer detriment can be minimised.

Fair and affordable water charges



During 2024 discussions will commence between water sector stakeholders to agree the water and wastewater charges for the next regulatory period 2027-2033, known as the Strategic Review of Charges (SRC). We are discussing with stakeholders how to engage consumers in the review and expect to be closely involved in the process.

We will build on our affordability analysis developed during the past year to advocate for effective policy that can support low income consumers. We will also consider consumer research that will explore the risk appetite for the pace and scale of price increases in the water sector.

A water market that works for non-domestic consumers



We will continue our activity in the non-household water sector and improve outcomes for small businesses in this market.

In 2024-2025, we expect to progress work with stakeholders to introduce a Code of Practice and Market Health Check function into the non-household market, which applies to the Licensed Providers who service companies within in it. Building on the research and development work undertaken previously, we will engage with the next stages in the process which integrate this initiative into the market.

We will continue to chair the Senior Stakeholder Group, and through this, support the introduction of further innovations to the market, such as a proposed further roll-out of smart metering technology.

A water sector shaped by the consumer experience



As the independent consumer advocate for the water sector, we will explore the development of a structured analysis of the experience of consumers in the water sector. This will explore a range of issues through our independent consumer lens. This may include service levels, billing, affordability, debt, complaints, consumer benefits from investment and private water supplies.

By using our research and data analysis expertise we can produce a robust review of the consumer experience of the water sector. We will contribute this analysis in our engagement with key stakeholders to help identify issues and emerging trends as well as to drive consumer improvements.

4. Delivering our work programme

Our governance

Consumer Scotland is a Non-Ministerial Office. We are independent of government, and we are directly accountable to the Scottish Parliament.

We report annually to Parliament on our future priorities through our forward Work Programme and our Annual Report. We engage regularly with the Scottish Parliament Economy and Fair Work Committee to provide updates of our work, including our findings and recommendations on consumer matters. We provide our research and reports to the Scottish Parliament Information Centre.

Our relationship with the Scottish Government is managed through a Framework Agreement, which we have jointly agreed with government, and which sets out our respective roles and responsibilities. The Agreement is published on our website. We are currently reviewing the Agreement and will publish a revised version, once that review is complete.

We are governed by a five-person Board, who work with the Chief Executive to provide scrutiny and strategic direction. Our Audit and Risk Committee advises the Board and Accountable Officer on strategic processes regarding risk, control and governance, governance statements and the annual report and accounts. The minutes from our Board and Committee meetings are published on our website.

We are an open and transparent organisation. We keep stakeholders and the wider public informed about the progress of our work, including our research and recommendations, through our website, social media, mailing list and mainstream media.

Our partnership approach

Working in partnership is at the heart of Consumer Scotland's approach.

Since we were established in April 2022 we have refreshed two key strategic networks, the Consumer Network and the Energy Consumers Network, which each bring together consumer organisations across Scotland. We will continue to convene these important networks during 2024-2025.

Consumer Network

The Consumer Network for Scotland brings together key partners in the Scottish consumer landscape, including regulators, advice agencies, enforcement bodies and advocacy groups, to identify and address issues facing consumers in Scotland. The Network enables members to achieve better outcomes for consumers through a collective approach, amplifying the expertise and activities of partners through collaborative action.

Discussions and activities touch upon a wide range of areas, including the cost of living, consumer detriment or vulnerabilities, and net zero. The Network focuses on opportunities for sharing data, improving understanding across the sector and identifying opportunities for positive change.

The Network meets quarterly, supported by interim intelligence sharing activity. Outputs will include guidance, shared best practice, and briefings.

Energy Consumers Network

In line with our strategic approach to partnership working, Consumer Scotland convened the Energy Consumers Network in the autumn of 2023. Building on the success of predecessor groups, the Network brings together front-line energy advice agencies in Scotland to allow them collectively to:

- Share intelligence on emerging energy issues
- Collaborate to improve the consumer experience
- Provide advice, perspectives and constructive challenge to companies and statutory bodies

The ECN is independently chaired by Lewis Shand Smith, who also represents the views of the Network elsewhere, including at the Scottish Energy Advisory Board (SEAB).

UK-wide partnerships

Consumer Scotland contributes to a number of UK-wide strategic partnerships, including the Consumer Protection Partnership and the BSI Consumer Forum. We will continue to participate in these networks during 2024-2025. In doing so, we will highlight issues of importance to consumers in Scotland across a range of markets. We will also draw on learning and evidence shared by other network members to enhance our evidence of and understanding of UK-wide consumer challenges.

Data sharing and research collaboration

Consumer Scotland has signed a number of data sharing agreements with partner organisations, to help develop a comprehensive evidence-base of the major issues facing consumers in Scotland.

We will continue to deploy and monitor these arrangements in 2024-2025 to ensure that our work is informed by a sophisticated, robust evidence base. We will also enter into new agreements and work jointly with others to commission research where appropriate, to continue building a detailed picture of consumer issues across Scotland, helping us to decide where we should take action.

The Consumer Duty

Consumer Scotland has established an advisory group to provide advice and insight on the development of guidance for public bodies responsible for meeting the Consumer Duty.

We will continue to work in partnership with advisory group members, and with the wider public sector, during 2024-2025 as we publish, consult on and refine the Consumer Duty guidance. The effectiveness of the Consumer Duty in delivering improved outcomes for consumers will be dependent on public bodies being actively engaged with the Duty and having the resources and support that they need to apply it appropriately. Working in partnership with the public sector is central to our approach in developing the guidance that will support the Duty.

Recall of goods

Consumer Scotland is working closely with the Office of Product Safety Standards to understand how its existing product recall database might be enhanced to deliver an improved recall service for consumers in Scotland.

Partnership working in this space is essential to ensure a coherent, joined up system for consumers and to maximise the value of public funds. We will continue to work in partnership with OPSS during 2024-25.

Corporate cooperation

Consumer Scotland is committed to working closely in partnership with other public bodies across Scotland to maximise the efficiency of our operations and the effectiveness of our work.

We currently share premises with the Registers of Scotland in both Edinburgh and Glasgow. In 2024-2025, we will move our Edinburgh office to collocate with Environmental Standards Scotland (ESS), based at the headquarters of the Scottish Legal Aid Board. Through collocation, we expect to make a number of efficiency savings in future years, as well as identify new opportunities for formal and informal sharing and learning with colleagues from ESS and other similar public bodies.

We are members of the Scottish Delivery Bodies Group which brings together public bodies to share experiences and work collaboratively on the public sector reform agenda.

Building our capacity

As a new organisation, Consumer Scotland will continue to develop and build our organisation during 2024-2025.

This will include further strengthening our governance mechanisms, identifying new opportunities for collaboration with other public sector bodies, continuing to develop our organisational culture and supporting the ongoing learning and development of our staff team.

As we develop our organisation, we are bringing together colleagues from across the organisation to help design and improve different aspects of our operations. This includes, for example, internal working groups considering issues such as equality, diversity and inclusion, understanding impact, and our approach to learning and development.

Measuring our impact

Consumer Scotland is committed to monitoring our impact and being transparent about our performance.

We published our Performance Framework in December 2023. In the Framework we set out our approach to assessing our impact. Our approach is comprised of the following components:

- Organisational Activity Indicators
- Outcome monitoring and assessment of Consumer Scotland's influence and impact, including a Recommendations Register, Impact Reviews and Workstream Monitoring

Consumer Scotland works in partnership with others. Our approach to assessing our influence and impact is based on contribution analysis which is reflective of the complexity of the sectors we work within and the broad range of organisations working within them.

We report on our impact annually, through our Annual Report and Accounts, which we lay before the Scottish Parliament, and which are subject to independent audit. In addition, the Consumer Scotland Act 2020 requires Consumer Scotland to commission an independent review of our performance after its first three years and every subsequent five years.

Funding

Consumer Scotland is funded from two main sources. We receive our general funding from the Scottish Government's annual budget, which is approved by the Scottish Parliament. For 2024-2025 our general funding is £2.4 million.

We also receive funding for research and advocacy activity in electricity, gas, post and water sectors. This funding is provided via levies, which are derived from consumers' bills. Our levy requirements for 2024-2025 are set out in the table below. This also includes funding for:

- Big Energy Savings (Worried this Winter), which is delivered by Citizens Advice Scotland
- Transition funding in preparation for taking on our new role in relation to heat networks advocacy.
- The Scottish element of GB-wide consumer advocacy activity in gas, electricity and postal sectors, which is delivered by Citizens Advice

Consumer Scotland recognises the severe pressures facing public finances. We will work efficiently to achieve maximum value for money from our work for consumers. We will work closely with a wide range of organisations, including consumer advocacy bodies in Scotland, England and Wales and Northern Ireland, to achieve better outcomes and avoid duplication of activity.

We follow the best practice guidance in the Scottish Public Finance Manual, and we operate in line with the Public Finance and Accountability Scotland Act. Our accounts are subject to external audit, which is commissioned by Audit Scotland, and which are laid before Parliament.

We have a set of prioritisation principles that we use to help ensure we are maximising impact of our powers and duties and the use of our resources and capacity to achieve better outcomes for consumers and value for money.

Levy-Funded Work Programme Provisional Budget 2024-2025

Sector	Energy Levy	Post Levy	Water Levy	Heat Networks Levy	Consumer**	Directorate**
Programme	£88,600	£66,900	£116,400			
Big Energy Savings Campaign and Network	£319,000					
Staffing	£488,800	£143,200	£249,000			
Staff-related Costs Contribution	£41,900	£13,300	£26,700			
Transition Funding				£62,000		

Scottish Contribution to GB-wide advocacy work delivered by Citizens Advice	£154,140	£32,187			£64,260	£9,800
Total	£1,092,440	£255,587	£392,100	£62,000	£64,260	£9,800

*Note all costs are those anticipated at the time of publication of this Draft Work Programme. Budgets are subject to final confirmation with the relevant funding organisations.

**The 'Consumer' and 'Directorate' columns relate only to the Scottish Contribution to GB-wide advocacy work delivered by Citizens Advice. These headings are used here to align with the Citizens Advice work plan, which applies funding across the 4 headings of Energy, Post, Consumer and Directorate for advocacy work in England and Wales.

Appendix – workstream prioritisation criteria

Consumer impact

What is the nature of the consumer harm, or risk of consumer harm, that this workstream addresses? What is the scope for consumer benefit that the workstream seeks to identify?

This should be considered against:

- How many, and which types of, consumers are affected by the issue?
- How significant or frequent is the level of detriment incurred?
- What gaps in the evidence base are there to answer these questions?

Outcomes

What scope do we have to influence or change attitudes, understanding, or policy through the proposed activities?

This should be considered against:

- What is it that we are trying to change or influence?
- How likely is it that we will be able to do that?

Partnerships and collaboration

Why is Consumer Scotland the right organisation to lead the proposed work?

This should be considered against:

- What is the niche, or unique strengths, that Consumer Scotland could bring to this issue?
- Are other organisations active in this space? If so, who, and how do we add value, collaborate with, or influence them? If not, why not, and should Consumer Scotland be filling the gap?

Strategic alignment

How does the work align with or link to the areas of focus in our Strategic Plan? Does it contribute to the fulfilment of our statutory responsibilities?

This should be considered against:

- Can we draw learning in this work from the other markets that Consumer Scotland is working in?
- How does the work contribute to us achieving the appropriate organisational balance in our programme, across workstreams, methods, short v. long term, etc.?

Resources and capacity

Why is now the right time to act? How much resource (both internal time and contracted support) are we likely to need to secure the outcomes we aspire to?