

**Consumer
Scotland**

Luchd-Cleachdaidh Alba

Consumer Scotland Draft Work Programme 2025-2026

Improving outcomes for
consumers in Scotland

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1. Overview

Delivering change for consumers in Scotland

We are all consumers

We are all consumers – purchasers or users of goods and services – in a wide variety of services and markets.

Being a consumer is not only about when we go shopping to buy physical things. It is also when we use private and publicly provided services. Passengers, tenants, internet users, energy users, students and patients are all consumers. People may not label themselves as a consumer in these contexts. But the benefit of taking a consumer approach is that it helps to recognise that, when people use goods and services, they are in a particular kind of relationship with those who provide these to them.

For policymakers, understanding and acting on the consumer perspective is essential to a thriving society and economy. Consumer analysis tells us how well markets and services are working for those who use them. It highlights the barriers faced by those who are excluded from these markets and services. And it can identify what needs to change to meet the needs of consumers of the future.

The role of Consumer Scotland

Consumer Scotland is the statutory, independent body for consumers in Scotland, accountable to the Scottish Parliament.

Established in 2022, Consumer Scotland is now in our third full year of operation. Our purpose, as set out in our first Strategic Plan for 2023-2027, is to improve outcomes for current and future consumers in Scotland. It is our ambition that every consumer in Scotland can participate in a fair and sustainable economy, confident their needs and aspirations will be met.

Our work is underpinned by robust data, research and analysis on the issues that matter to consumers in Scotland. Using our continually evolving evidence base, we provide government, regulators, businesses and the wider consumer landscape with insight, advice and recommendations on the actions that are required from them to achieve positive outcomes for consumers.

The internationally recognised consumer principles, which set out what good consumer outcomes look like for any given market or service, provide the framework for our policy and advocacy representations on behalf of consumers.

These principles are:

- **Access:** Can people get the goods or services they need or want?
- **Choice:** Is there any?
- **Safety:** Are the goods or services dangerous to health or welfare?
- **Information:** Is it available, accurate and useful?
- **Fairness:** Are some or all consumers unfairly discriminated against?
- **Representation:** Do consumers have a say in how goods or services are provided?
- **Redress:** If things go wrong, is there a system for making things right?

Consumer Scotland has a remit to work across the economy, including the public, private and third sectors. We are the levy-funded advocacy body for the electricity, gas, heat network, post and water sectors in Scotland. Our Draft Work Programme sets out our plans for 2025-2026 in these particular markets, as well as within the wider economy.

Our Strategic Plan sets out three cross-cutting consumer challenges which also inform the work of our Draft Work Programme. These are:

- Improving the **affordability** of goods and services
- Taking action that supports consumers to mitigate and adapt to the effects of **climate change**
- Addressing the issues that matter most to **consumers in vulnerable circumstances**

As the statutory consumer body, Consumer Scotland has an important leadership role in Scotland's consumer landscape. Our Draft Work Programme sets out how we will play this role across our range of activities, including providing grant funding for consumer advice, information and advocacy activity to other organisations. We will convene and coordinate action across the consumer landscape to promote collaboration and partnership working that delivers positive outcomes for consumers.

Our work in the past year

Over the past 12 months Consumer Scotland has developed significant momentum across the wide range of activities that we are delivering to help achieve better outcomes for consumers in Scotland.

We provide a brief overview here of some of our most significant work.

Publishing new evidence and insights

Providing evidence and insights to inform policymakers on the issues that matter to consumers is a core part of Consumer Scotland's role.

During the past year we have published a wide range of reports, briefings and analysis across multiple markets, delivering new evidence and recommendations to help

inform the decisions of governments and regulators. Our publications have covered issues including:

- The outlook for consumers in Scotland in 2024-2025
- Consumers' perceptions of and engagement with the transition to Net Zero
- How to design energy support to benefit disabled consumers
- The causes and impact of energy debt
- The effectiveness of the National Concessionary Travel schemes
- The consumer challenges in the private and social rented housing sectors
- Water poverty and the affordability of water and sewerage charges
- Dynamic pricing in Scotland
- Consumer detriment, with a focus on housing, telecommunications and finance
- The consumer experience of Electric Vehicles
- Decarbonisation of the postal service (forthcoming)
- The consumer experience of installing heat pumps and/or solar PV technologies (forthcoming)
- The experiences of small businesses in Scotland as consumers (forthcoming)
- The experiences of disabled consumers living in rural and remote Scotland (forthcoming)

Advocating for changes to legislation

We have engaged directly with a number of pieces of proposed legislation that will have significant impacts for consumers in Scotland. We have provided written and oral evidence and published briefings to advocate for consumers' interests in key Bills as these have passed through the legislative process. This includes:

- The Housing Bill
- The Heat in Buildings Bill
- The Regulation of Legal Services Bill
- The Climate Change Targets Bill
- The Circular Economy Act
- The Digital Markets, Competition and Consumers Act

Advocating for public policy changes

We have engaged with governments, regulators and other policy makers to advocate on behalf of consumers in a wide array of policy development processes. This includes:

- Representing consumers in the development of new policy proposals and legislation that will enable the water sector in Scotland to respond more effectively to the challenges of climate change
- Producing new recommendations to inform the development of more effective systems to improve the affordability of energy bills for consumers in Scotland
- Leading stakeholders in the non-domestic water sector to create the first ever code of practice for suppliers in the market, to improve the services delivered to consumers
- Working with consumer bodies in England and Wales and in Northern Ireland to propose new solutions to government and industry which will tackle the problem of 'post exclusion' for consumers with no fixed address
- Advocating on behalf of consumers for improvements to be made to the complaints systems of parcel operators across the UK
- Putting forward the consumer perspective to inform regulatory decisions across a wide variety of issues, including access to cash, energy standing charges, unregulated legal services, trader recommendation platforms, digital subscriptions and media literacy

Influencing investment decisions

Governments, regulators and businesses in a number of essential consumer markets face challenging decisions in the coming years about how to sustain key infrastructure, and the extent to which consumers can be asked to meet the costs of the required investments through increased bills or changes to service specifications. We are providing evidence, insight and recommendations across a number of these decision-making processes, including:

- The Strategic Review of Water Charges for 2027-2033, for which we have agreed a Memorandum of Understanding with Scottish Water and the Water Industry Commission for Scotland to put consumer evidence at the heart of the process
- A review of the future of the universal post service
- The economic regulation of large scale new build nuclear power in Great Britain

We have entered into a new Memorandum of Understanding on cooperation with the National Electricity System Operator (NESO) aiming to create positive outcomes during the transition to an energy system to support Net Zero.

Speaking up for consumers to prevent harm

We have undertaken a number of activities that respond directly to problems that consumers are experiencing in different markets which require urgent attention. This includes:

- Launching our first Consumer Scotland investigation, which is examining consumer protections in the green home heating market. Our investigation report will be published early in 2025
- Entering into a new partnership with the Office of Product Safety Standards (OPSS) to enhance the effectiveness of the OPSS recall of goods database for consumers in Scotland
- Recommending actions by governments, regulators and telecoms providers to mitigate the risks to consumers in Scotland posed by the migration to digital landline phones (VOIP)
- Convening energy advice agencies and the regulator to press for action to reduce the serious risks to consumers in Scotland posed by the pending switch off of RTS meters, which will have particular implications for rural energy consumers
- Engaging with the Scottish Government, regulators and complaints bodies to seek resolutions to the significant challenges being experienced by former clients of McClures, a Scottish law firm which collapsed in 2021

Building our evidence base

We have worked in partnership with the Competition and Markets Authority to support the Consumer Protection Survey 2024. Our input is securing an increased number of participants in Scotland in the survey, which will improve the value and robustness of the data for stakeholders in Scotland.

We have established new framework contracts with external research partners to support our quantitative and qualitative research. These new arrangements significantly enhance our ability to commission robust, timely consumer research evidence across a range of topics.

Our Consumers in Vulnerable Circumstances Advisory Committee includes representation from charities, advice bodies, companies and academic institutions in Scotland. With their support we have put in place a number of measures to underpin our approach to building our evidence base on the experiences of consumers in vulnerable circumstances. This includes a statement of our approach, an ethical approvals process for research, and research principles for carrying out work in this area to embed the voice of lived experience in our work.

Influencing the public sector

We have published draft guidance to public authorities in Scotland on the consumer duty, supporting public bodies to take account of consumers in their strategic decisions. The final version of the guidance will be published in February following a public consultation on the draft guidance. We have provided information sessions for consumer groups and small businesses on how they can use the duty to influence decision-making within the public sector.

The refreshed National Outcomes for Scotland, published in May by the Scottish Government, includes reference to consumers for the first time. Specifically, the new National Outcome for Wellbeing Economy and Fair Work includes a new focus on “supported, empowered, confident consumers”. This change follows on from previous Consumer Scotland engagement with the refresh process for the National Performance Framework.

Leading the consumer landscape

As the statutory consumer body in Scotland we regularly convene stakeholders from across the consumer landscape to consider issues of importance to consumers and identify new solutions to these challenges.

We convene:

- A newly-established Leadership Group, bringing together the Chief Executives from the key consumer advocacy, advice and enforcement organisations in Scotland
- The Consumer Network for Scotland, which brings together UK economic regulators, advice bodies, enforcement agencies, governments and complaints bodies in Scotland to consider cross-market issues affecting consumers and actions that can be taken to address these
- The Energy Consumers Network, which brings together frontline energy advice agencies in Scotland to examine key consumer issues in the energy market, share knowledge and learning, and identify changes required from government, regulators or suppliers

We also represent consumers in Scotland on a wide range of externally-run working groups, forums and networks. These include the UK Consumer Protection Partnership, the BSI Consumer Forum, the Scottish Government’s Regulatory Review Group and the First Minister’s Scottish Energy Advisory Board.

During this year we have been leading the development of Scotland’s new consumer advocacy and advice system for heat networks, in preparation for new regulations commencing in this market. We are working with Advice Direct Scotland and Citizens Advice Scotland on establishing the advice aspects of the new system.

The outlook for consumers in Scotland

Overview

Recent years have presented many challenges for consumers in Scotland.

As we enter 2025, inflation has fallen from its highs of 2022 and 2023, but it leaves a legacy of higher prices and concerns about consumer debt. In many markets consumers have a high degree of choice but they can be exposed to risks, including poor quality goods and services and a lack of transparency around prices and terms. New products and technologies are creating new opportunities to deliver good consumer outcomes –

but these changes also bring risks for consumers when policy, legislation, regulation, information, advice and redress lag behind market development.

The big challenges facing consumers

In September 2024 Consumer Scotland published our Consumer Outlook report in which we set out the big issues facing consumers in Scotland today and in the future. We considered the scale and significance of those issues, and identified the consumer-related policy questions that these issues give rise to.

In our Outlook report, we highlighted a broad range of issues that currently affect the wellbeing of consumers in Scotland and their experience of engaging with different markets and services. These include:

- Price changes during the cost-of-living crisis have driven changes in patterns of consumer spending and consumption, particularly in relation to essential goods and services. People are now spending more on some essentials but are getting less in return. Spending on food and drink across UK consumers for example, increased 17% between the first quarter of 2021 and the first quarter of 2024, but consumption fell by 10%.
- A troubling impact of price inflation during the cost-of-living crisis has been a rise in the number of consumers falling into arrears to their utilities providers. The average amount of arrears for indebted GB household gas accounts almost doubled between 2021 and 2024 for example, whilst around 9% of Scottish households were in energy debt in winter 2024.
- Around ten percent of Scottish households are in ‘water poverty’ in 2024-2025. This is slightly below typical historic rates, as a result of below inflationary increases in the water charge during the cost of living period. But there is a consequence in terms of lower revenues and potentially lower investment in water and sewerage infrastructure – which means that difficult decisions about prices will now have to be taken in the coming years.
- Consumer detriment – problems associated with buying or using goods and services which cause consumers stress, cost them money and take up their time – is widespread in Scotland. The majority (72%) of consumers in Scotland experienced at least one incidence of detriment between April 2020 and April 2021. Detriment incidents problems resulted in a ‘net monetised cost’ to consumers in Scotland of £4.7 billion.
- Poor customer service and complaints handling can create and exacerbate detriment. For example, consumers’ dissatisfaction with how complaints are handled is common in telecoms services. In financial services, consumers have found that being unable to reach their provider is the biggest ongoing cause of detriment.
- Consumers are more likely to experience detriment when purchasing goods, services and subscriptions online. Practices such as drip-pricing, dynamic-pricing, subscription traps and fake reviews risk causing detriment to consumers.

- Governments' commitments to reach Net Zero have major implications for consumers. The Committee on Climate Change (CCC) has estimated that over 60% of the required emissions reductions to meet Net Zero will be "predicated on some kind of individual or societal behavioural change".
- The majority of consumers (around three quarters) in Scotland are concerned about climate change. However, they are often unsure what they can do to support the transition to Net Zero. They would like to see more leadership from governments, regulators and business, who they regard as having the greatest responsibility for reducing emissions.
- Policy aspirations to decarbonise homes and transition away from petrol and diesel cars in favour of electric vehicles have the potential to bring benefits to consumers and wider society, but also bring significant risks and potential costs for consumers. For example, home charging for electric vehicles is associated with cheaper costs and higher convenience, but around half of all households in Scotland live in circumstances where charging at home is not likely to be an option. This situation risks seriously curtailing the uptake and use of EVs, and creating inequalities in the use of this technology, unless substantial enhancements to the public charging network are made.

These challenges are faced to varying extents by all consumers. But some consumers are at greater risk of harm than others. Consumers in vulnerable circumstances¹ are more exposed to the impacts of price changes and are at greater risk of experiencing detriment, partly as a result of less choice and reduced accessibility.

The public policy response

A proactive set of policy responses to these issues is required in Scotland. Governments, regulators, businesses and other policy makers need to create and maintain a framework to support consumers in Scotland to navigate complex markets, tackle and reduce the risks of consumer harm and unfair outcomes, and boost consumer confidence.

Particular policy challenges, which require action in Scotland in the year ahead, include:

- Designing tariff structures – and targeted affordability support – for essential services and markets in order that the substantial investment requirements to sustain or grow those services and markets is shared fairly across consumers

¹ Section 25 of the Consumer Scotland Act defines "vulnerable consumers" as:

Consumers who, by reason of their circumstances or characteristics—

"(a) may have significantly fewer or less favourable options as consumers than a typical consumer, or

(b) Are otherwise at a significantly greater risk of:

(i) harm being caused to their interests as consumers, or

(ii) harm caused to those interests being more substantial,

than would be the case for a typical consumer"

The Act defines "vulnerable consumers" in a different way to the "typical consumer", by placing an emphasis on their "circumstances" or "characteristics". The Act suggests that vulnerable consumers may either have fewer or less favourable options or may be at greater risk of harm - or of more substantial harm - than typical consumers. The Act does not define "circumstances" or "characteristics", as there are a number of factors that can influence consumer vulnerability and these can change over time.

- Enhancing – often at pace – regulation and enforcement in relation to new products, platforms and services to protect consumers from the risks of new harms as they emerge
- Ensuring consumers have access to high quality information and advice to enable them to engage confidently in markets
- Playing a more proactive leadership role in enabling consumers to be able to play an active part in the transition to a Net Zero society, through a mixture of advice and information, financial incentives, market stimulation, protection against harm and access to redress

These are vital challenges for the wellbeing of Scotland’s economy and society. How policy makers identify the most appropriate responses to these issues is important. These matters often require difficult choices and trade-offs about where to prioritise investment and which groups of consumers to support. It is essential that the voice of consumers is central to finding the answers.

Consumer Scotland is looking forward to playing our part to contribute to this vital work. Our Draft Work Programme sets out where we will concentrate our efforts to do so during 2025-2026.

2. Our 2025-2026 Priorities

Our overarching outcomes

Consumer Scotland's work in 2025-2026 will focus on four overarching outcomes for consumers:

- **Fair and Affordable Markets:** markets are fair and affordable for all consumers, including those in vulnerable circumstances
- **Investing for the Future:** investment decisions to develop or renew essential markets or infrastructure are based on consumers' priorities and needs
- **Trustworthy, High Quality Products and Services:** the services that consumers use can be trusted to deliver what consumers value and expect and, protect them from harm
- **Consumers at the Heart of Scotland's Economy and Society:** consumers are recognised as being central to achieving a flourishing Scotland, through increased wellbeing and sustainable and inclusive economic growth

Under each of these overarching outcomes we will deliver a series of workstreams, each with their own specific outcome. A summary of each overarching outcome and its associated workstreams is set out below.

Fair and Affordable Markets

Markets are fair and affordable for all consumers, including those in vulnerable circumstances

Specific workstreams we will deliver in this area in 2025-2026 are as follows:

- A new approach to energy affordability
- A future energy retail market designed for consumers
- Fair and affordable water charges
- A fairer housing rental market
- Markets that deliver for small businesses
- Securing a universal postal service that delivers for consumers in Scotland
- Equitable postal services for Scotland's islands

Investing for the Future

Investment decisions to develop or renew essential markets or infrastructure are based on consumers priorities and needs

Specific workstreams we will deliver in this area in 2025-2026 are as follows:

- Electric Vehicle infrastructure that works for all consumers
- A strategic water investment programme shaped by consumers
- Consumers at the centre of a climate resilient water sector
- A circular economy for consumers
- Postal Service 2040: Designing a consumer-centred future service
- A heat network market that works for consumers

Trustworthy, High Quality Products and Services

The services that consumers use can be trusted to deliver what consumers value and expect and protect them from harm

Specific workstreams we will deliver in this area in 2025-2026 are as follows:

- An energy efficiency system that delivers for consumers
- An improved system for preventing and dealing with water debt
- A water market that works for non-domestic consumers
- Decarbonised postal markets that deliver for consumers
- Public transport options that consumers want to choose
- Improved protection for consumers from product harm

Consumers at the Heart of Scotland's Economy and Society

Consumers are recognised as being central to achieving a flourishing Scotland, through increased wellbeing and sustainable and inclusive economic growth

Specific workstreams we will deliver in this area in 2025-2026 are as follows:

- Public bodies delivering for consumers
- Consumer insights driving decision-making
- A cross-market approach to delivering more affordable essential services

Our strategic approach to change

Consumer Scotland's Performance Framework includes our Strategic Theory of Change, which describes our approach to delivering improved consumer outcomes.

For each of the workstreams in our Draft Work Programme we have set out a specific theory of change, based on an abbreviated version of our strategic model. For each of these workstreams we describe:

- The problem or opportunity we are seeking to address
- What we will do and who we will work with
- What we want to be done differently as a result
- The impact this would have for consumers

As an advocacy organisation, the outcomes that Consumer Scotland is pursuing on behalf of consumers will require positive responses by governments, regulators, businesses and service providers if progress is to be achieved. Many areas will require substantial responses and ambitious, long-term action to deliver positive, sustainable improvements for consumers.

The complex nature of these issues means that many of the outcomes that we have set out in this Draft Work Programme are likely to take a number of years to achieve. Our Draft Work Programme describes the activities that Consumer Scotland will undertake to help deliver progress towards the desired outcomes during 2025-2026.

These activities will include:

- the ongoing development of our high quality evidence base;
- rigorous analysis;
- the application of market and policy expertise;
- the provision of clear, tangible recommendations;
- and leadership and coordination across the consumer landscape.

In undertaking these activities we recognise that delivering improved consumer outcomes requires input from many different stakeholders. Building on the significant stakeholder engagement we have undertaken since we were established, we will continue to work with national and local governments, regulators, other public bodies, businesses, service providers, enforcement bodies, advice agencies, representative bodies and charities to deliver good outcomes for consumers.

In delivering our plan we will remain alert to emerging issues that impact on the wellbeing of consumers during the next year. In some cases, we may need to adapt our plans to respond appropriately to these issues. We will use our prioritisation process to help support us in taking such decisions.

The following pages set out our plans for our priority workstreams in 2025-2026.

Fair and Affordable Markets

A new approach to energy affordability

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Many consumers in Scotland struggle with their energy bills. Our latest Energy Tracker shows that a quarter of households in Scotland struggle to keep up with the energy bills. As a legacy of the energy crisis more than 1 in 12 households in Scotland in are now in energy debt.</p> <p>Current interventions to improve energy affordability have been developed piecemeal, over time. There is a pressing need for these arrangements to be reviewed and for a new, more joined-up, structured set of affordability policies, based on a systematic understanding of consumer need.</p>	<p>We will engage with the UK and Scottish governments and Ofgem to provide evidence and recommendations to inform the development of energy affordability policy.</p> <p>We will work collaboratively with representative bodies to identify possible solutions. This will include our leadership of the Energy Consumers Network.</p> <p>We will publish analysis and continue to advocate for policy interventions that enhance affordability.</p>	<p>Consumers to have access to a range of well targeted affordability interventions and protections, put in place by governments and regulators.</p> <p>Energy suppliers to have an enhanced understanding of their customers in order to put such interventions in place to protect consumers.</p> <p>High essential energy users, including disabled consumers, to have access to a range of additional protections and measures that ensures their safety.</p>	<p>Reduced energy affordability concerns for consumers and lower levels of debt, as consumers are more able to manage their energy needs and costs.</p>

Fair and Affordable Markets

A future energy retail market designed for consumers

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>The current design of the retail energy market is unlikely to result in a fair and inclusive market for future consumers, or to support the widespread changes needed to enable the transition to Net Zero.</p> <p>In 2023-2024 we commissioned a rapid evidence assessment which consolidates and critically analyses the existing evidence base on the key consumer issues when considering the design of the future retail energy market in a GB and Scottish context, including impacts on different consumers.</p>	<p>Based on our underpinning evidence, we will develop a clear set of principles to inform future market design to deliver improved outcomes for consumers in Scotland. We will use these outputs to engage with key decision makers and policy makers to advocate for a fair and inclusive future retail energy market.</p> <p>We will contribute to key policy processes including working groups, roundtables and consultations to deliver evidence and insight.</p>	<p>Ofgem and the UK Government to actively consider consumers in Scotland, and the specific issues affecting them, in the design of a future GB energy market.</p> <p>Policy makers to give consideration to how to achieve an inclusive design approach to the future market. The distributional impacts of any reform to the GB energy retail market to consider and protect consumers at risk of poorer outcomes.</p>	<p>A fair and sustainable energy market where current and future consumers, including those in vulnerable circumstances, have access to affordable energy in markets that prioritise positive consumer outcomes.</p>

Fair and Affordable Markets

Fair and affordable water charges

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>More than 10% of households in Scotland (around 275,000 households) live in water poverty. Within this group, 10,000 households are in severe water poverty. During the next decade there will be a need for significant investment in Scotland's water sector to maintain service levels and respond to the challenges of adapting to climate change. This is likely to lead to a need for above-inflationary increases in the water charge. Action is required to protect low income consumers from the impact of these charges.</p>	<p>In Consumer Scotland's 2024 report on Affordability of Water and Sewerage Charges we set out in depth analysis of the key affordability issues for consumers in Scotland and made a number of recommendations to address these challenges. In 2025-2026 we will update our analysis in light of updated forecasts and pricing assumptions from Scottish Water. We will continue to work with government and other key stakeholders to develop and deliver proposed policy options to protect low income consumers.</p>	<p>A series of interventions by the water sector in Scotland, coordinated by Scottish Government, to better protect low income consumers from increases in water charges. These interventions would include:</p> <ul style="list-style-type: none"> • Action to increase uptake of Council Tax Reduction amongst eligible consumers • Increasing the level of discount provided through the Water Charge Reduction Scheme • Consideration of a 'by-application' scheme to support low income consumers not reached through existing financial relief. 	<p>Water will be more affordable for low income consumers across Scotland and there will be a reduction in the water poverty rate.</p> <p>The Strategic Review of Charges process for water for 2027 will deliver a final determination that appropriately protects low income consumers.</p>

Fair and Affordable Markets

A fairer housing rental market

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Consumer Scotland's 2024 analysis of tenants' experience highlighted a range of challenges for tenants. These include:</p> <ul style="list-style-type: none"> • Supply outstripping demand for social rented housing • Affordability problems in the private rented sector, particularly for those on low incomes • Issues with condition and repairs, particularly in private rented and local authority rented properties • Difficulties for private rented sector tenants in having problems resolved and being able to uphold their rights 	<p>We will undertake new research and analysis of tenants' experience in the social rented sector, assessing whether consumer needs are being met and examining the differences in outcomes experienced by consumers in different parts of the sector. We will use this and the outputs from our previous work to conduct advocacy activity, seeking improved outcomes for tenants, and engaging with key legislative, regulatory and redress processes. We will work with government, sector stakeholders, charities and other consumer groups to help achieve change for consumers.</p>	<p>Policy makers, regulators and other key stakeholders to be better equipped to understand and respond to tenants' needs, experiences and preferences.</p> <p>Effective consideration of tenant outcomes to inform the design of services which improve levels of access to and enjoyment of social housing.</p> <p>Private rented tenants to have more confidence in pursuing resolutions when they experience problems during their tenancy.</p>	<p>The rental market will be fairer for consumers as tenants are better able to enjoy tenancies that meet their needs. There will be an improved renting experience across tenures, a reduction in consumer detriment, and increased consumer confidence.</p>

Fair and Affordable Markets

Markets that deliver for small businesses

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Small businesses can face similar challenges to domestic consumers in how markets work for them. This includes issues of 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 as consumers can be different. The nature of the goods and services a small business consumer purchases or uses can sometimes be different. Small businesses also have fewer protections, rights, and routes to redress when buying goods and services compared to domestic consumers.</p>	<p>In 2025 Consumer Scotland will publish a new report on small businesses' experiences as consumers in Scotland.</p> <p>We will deliver a programme of advocacy activity during 2025-2026 to highlight the findings of this research and to advance proposals to improve outcomes for small business consumers. We will work in partnership with small business organisations, governments and regulators on these issues, focusing on the markets and issues identified by our research as being of greatest priority.</p>	<p>Government, regulators and policymakers to have greater understanding of the markets where most action is needed to tackle problems experienced by small business consumers. Government, regulators and policymakers to be aware of and supported to deliver interventions to reduce the risk of harm for small business consumers in Scotland and treat them fairly. Depending on the priority areas identified, interventions may include increasing choice, access to redress, information and advice or ensuring higher levels of consumer protection for small business consumers.</p>	<p>There will be a reduction in the harm small business consumers experience in the priority areas identified.</p> <p>Small business confidence as consumers in the Scottish economy will increase.</p>

Fair and Affordable Markets

Securing a universal postal service that delivers for consumers in Scotland

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Post is an essential service for consumers across Scotland. Consumers rely on it receive letters about medical appointments, welfare benefits, financial services, energy bills and more. However, the decline in letter volumes over the past decade means that changes are now being proposed to reduce the scope and protections in the current system. These changes could cause harm to consumers, who have already experienced significant price rises and poor reliability for postal services in recent years. Rural consumers are particularly at risk of poor outcomes.</p>	<p>Building on our advocacy activity in 2024 and forthcoming new research, we will seek to influence decisions taken on reforms to the postal system and on how the affordability of post should be protected. We will highlight the distributional impacts of proposed changes and advocate for stronger recognition of the consumer interest. We will engage with the regulator, UK Government and Royal Mail, providing insights and recommendations. We will seek to widen awareness of and engagement with this issue amongst key stakeholders in Scotland.</p>	<p>Changes to the universal postal service to be closely informed by the priorities of consumers in Scotland. Measures to be in place to improve the affordability and reliability of the postal service for consumers.</p> <p>The priorities of postal consumers in Scotland, particular those in vulnerable circumstances, to be better understood by government and the regulator, and will shape any future reform decisions</p> <p>More stakeholders in Scotland to be aware of and engage in the postal service reform process.</p>	<p>A new model for the universal postal service is established which is sustainable, reliable and affordable for consumers in Scotland, providing the access they require to essential communications</p>

Fair and Affordable Markets

Equitable postal services for Scotland's islands

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Consumers living on Scottish islands do not always enjoy the same level of postal services as consumers in other parts of Scotland. Shetland, Orkney and the Western Isles are not covered by the delivery speed targets that Royal Mail has to meet. Consumer Scotland research found that 72% of consumers in the Highlands and Islands have been charged additional fees when ordering parcels online. There have been recent, well-documented parcel delivery problems on some islands. And recent announcements of Post Office closures include those in different Scottish islands.</p>	<p>Consumer Scotland will undertake research and advocacy to consider how effectively postal services (mail, parcels and Post Offices) are working for island consumers. We will include both domestic and small business consumers in this work. We will engage directly with communities and with key post stakeholders, involving consumers in helping to design solutions to current challenges. We will consider the potential impacts for island consumers of proposed postal service changes; as well as the role of post in wider communications and social structures, as part of this work.</p>	<p>Policy makers, including the government and the regulator, Royal Mail, parcel companies and Post Office Ltd to have a new understanding of the experiences and priorities of Scottish island consumers.</p> <p>Specific actions, identified through consumer input to the work, to be taken forward to tackle problems experienced by island consumers when using mail, parcels or Post Office services.</p>	<p>Island consumers in Scotland will have access to equitable postal services, supporting improved engagement with other markets and services.</p>

Investing for the Future

Electric Vehicle infrastructure that works for all consumers

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>The sale of new petrol and diesel cars will be banned in the UK in the next 10 years and consumers will be increasingly reliant on electric vehicles (EVs) for domestic travel. Consumer Scotland research has identified a range of challenges with the current supporting infrastructure for EVs in Scotland. Without action, this will become more problematic as more drivers switch to EVs. Improvements are needed in consumer information, servicing and repair and public charging where those who cannot charge at home face significantly higher costs.</p>	<p>We will build on our 2024 research to deliver a programme of advocacy work to improve outcomes for EV users. Our focus will be on advocating for public charging infrastructure policy that delivers the right type of chargers in the right locations to support current and future consumers, particularly those unable to charge at home. We will work to monitor issues around servicing and repair for EVs, and seek improvement in the provision of information to consumers. We will work with Transport Scotland, Scottish Futures Trust, local authorities, and other key stakeholders.</p>	<p>Policymakers to more actively consider not only current electric vehicle drivers, but also future consumers whose needs will be different from current drivers.</p> <p>Future consumers' vehicles are more likely to be purchased used and therefore older, they are less likely to have done significant personal research before purchasing, and they will be less likely to have access to domestic charging. These interests will be understood and responded to by policymakers.</p>	<p>Those driving electric vehicles will benefit from infrastructure and other support that meets their needs. This will decrease the risk of electric vehicle drivers experiencing consumer harm and unequal consumer outcomes, and improve consumer confidence, further encouraging uptake of EVs and supporting the transition to Net Zero.</p>

Investing for the Future

A strategic investment programme for Scotland's water shaped by consumers

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>The maximum water charges to be paid by consumers in Scotland for the 2027 to 2033 period will be determined by a Strategic Review of Charges (SRC) process that has recently begun. The Review will determine how much funding is required for Scottish Water to fund its existing services and invest in infrastructure, responding to the twin challenges of climate change and ageing assets. These are significant strategic decisions which have a direct bearing on the services that consumers enjoy and the bills that they have to pay. It is vital that consumers' voices are at the heart of the decision-making process.</p>	<p>We have agreed a Memorandum of Understanding with Scottish Water and the Water Industry Commission for Scotland to put consumer views at the centre of the SRC process. As a key pillar in this work, Consumer Scotland will deliver, working collaboratively with key stakeholders, a robust deliberative research programme to test consumers' views of Scottish Water's final Business Plan. This is a significant innovation from past SRC processes, and it will assess whether the final plan commands consumer support. Consumer Scotland will also input to all other key decision points throughout the SRC process.</p>	<p>Scottish Water's capital investment Business Plan for 2027-33 to reflect consumer priorities and to demonstrate where consumer views have influenced decision making and prioritisation for investment.</p> <p>The findings from Consumer Scotland's deliberative research findings to continue to influence decisions on Scotland's water sector beyond SRC27.</p>	<p>The decisions taken during the SRC process will deliver the best possible outcomes for consumers, balancing the key priorities for investment against the need for water charges that are fair and affordable for all consumers and which command their support.</p>

Investing for the Future

Consumers at the centre of a climate resilient water sector

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Changes are needed in Scotland's water sector to respond to the challenges of climate change and protect water resources and wastewater infrastructure, including how consumers engage with services. Consumer Scotland's research has identified changes that are required to benefit current and future consumers to improve water resource planning, surface and waste water management and drinking water quality and security. The current legal framework for addressing these challenges is limited and requires updating to deliver what consumers require.</p>	<p>Consumer Scotland has previously delivered substantial consumer evidence on these issues.</p> <p>In 2025-2026 we will continue to contribute to the relevant policy development processes, providing our analysis and insight, to ensure that revised policy and legislation delivers for consumers.</p> <p>We will work closely with Scottish Government and other stakeholders in the water sector on these issues.</p>	<p>Stakeholders to have an improved awareness and understanding of the role of consumers in supporting climate change outcomes and the actions that are required to enable consumers to play their part.</p> <p>Policy development to reflect and respond to the needs of consumers, while an approach that centres partnering with customers and communities to achieve shared outcomes will be embedded in stakeholder dialogue.</p>	<p>Consumers will benefit from new policy and legislation which better tackles issues of water scarcity, water quality and flooding.</p> <p>Consumers will be better supported to play a role in tackling climate change, with more support to reduce water wastage and dispose appropriately of household waste.</p> <p>Consumers will benefit from nature-based solutions to infrastructure challenges, delivering improved outcomes.</p>

Investing for the Future

A circular economy for consumers

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>On average, people in Scotland consume more than double the sustainable level of material use needed for a high quality of life. Action is required to extend the life of consumer goods and increase their reuse and reduce consumption. Consumer Scotland research shows that cost, inconvenience and a lack of clarity act as major barriers to consumers making more sustainable choices. Consumers need more leadership and support from policy makers to create an enabling environment where sustainable choices are more convenient and affordable, turning these into the default choices.</p>	<p>We will use the findings of our substantial 2024-2025 research programme to engage the Scottish Government and other stakeholders, providing evidence and insight on the changes that will be required to achieve a supportive, enabling environment for consumers.</p> <p>We will deliver input to key policy and practice interventions, including the implementation of charges for single use cups, Deposit Return Scheme, packaging reform and the development of the Circular Economy Strategy and Routemap.</p>	<p>Stakeholders, including the Scottish Government, to work in closer collaboration and to have a clearer understanding of the needs and priorities of consumers. The impact of measures, individually and collectively, on consumers - including small businesses - to be better understood and considered.</p> <p>As a result, future legislation and policy to have a stronger focus on consumer needs and priorities and these are incorporated earlier in the policy making process.</p>	<p>Consumers will benefit from a more enabling environment, where it is easier, safer and more affordable to make sustainable choices, and where they can access information and support needed.</p> <p>Policy makers will understand the consumer journey, and the effects of measures, better allowing potential detriment to be identified and mitigated.</p>

Investing for the Future

Postal Service 2040: designing a consumer-centred future service

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Much of the current focus on reform of the UK postal sector is on short-term savings to support the existing system. In Consumer Scotland's response to Ofcom's work on this, we recommended that a more strategic, future focussed discussion was also required. More consideration is required on where post sits within the UK's wider social, communications and logistics systems and how this varies between communities. More work is required on the interaction between post and both digital markets and physical services and there is more learning to be gleaned from changes in other jurisdictions.</p>	<p>Consumer Scotland will develop and deliver a stakeholder engagement programme to consider what will be required from the postal service in 2040 to meet the needs of consumers in Scotland. We will draw on evidence produced by Consumer Scotland and key stakeholders in response to the current USO reform proposals to inform a series of stakeholder roundtables in Scotland. The discussions will cover issues including how post fits with the wider communications sector; its social value; and the role of the consumer voice in securing good outcomes.</p>	<p>The workstream will engage with stakeholders from a wide range of sectors in Scotland, to build understanding of the role of post in current systems, and how this may change in future.</p> <p>There will be a shared vision amongst Scottish stakeholders of how postal services should be designed and delivered in 2040. There will be support for an increased consumer voice in post decision-making</p> <p>Government and the regulator will take a more strategic, future-looking approach to any future changes to postal services.</p>	<p>A future postal service which is affordable, meets consumer needs, is sustainable now and in the future.</p> <p>A postal service which is seen as relevant to and more fully integrated with other communication consumer markets.</p> <p>A postal sector which gives greater regard to the consumer voice.</p>

Investing for the Future

A heat network market that works for consumers

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Heat networks supply heat from a central source to consumers and can cover large areas such as towns or cities, or can be local, supplying smaller groups of buildings such as housing estates. They avoid the need for individual boilers or electric heaters in every building helping the reduce emissions and achieve net zero targets. Currently, around 1.5% of Scotland's heat is supplied from heat networks, but the Scottish Government has set an ambitious target to increase this to 8% by 2030. Consumer Scotland will become the statutory advocate for heat network consumers in Scotland in 2025.</p>	<p>We will continue to engage with the development of heat networks regulation. We will lead a heat networks intelligence group to monitor the market and identify and escalate consumer issues. We will work with our consumer landscape partners to provide heat network consumers with access to advice and support. We will represent consumers on key heat network consumer forums and industry groups. We will engage with the Heat in Buildings Bill to ensure that future heat network consumers are considered and protected in the transition to low carbon heating.</p>	<p>Heat networks regulations to be designed with a clear understanding of and focus on the issues that matter to consumers in Scotland</p> <p>Heat network consumers to have access to high quality advice and support</p> <p>Heat network providers to have a clear understanding of the consumer perspective and to be responsive to this</p> <p>The Scottish Government Heat in Buildings Bill to take account of the role of heat networks in the transition to low carbon heating</p>	<p>Heat network consumers in Scotland will have access to a market that delivers safe, affordable, reliable low carbon heating. Consumers are protected from harm, are well informed and have access to advice, support and redress should they need it.</p>

Trustworthy, High Quality Services and Products

Energy efficiency markets that deliver for consumers

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Removing emissions from home heating is an essential part of Scotland's transition to Net Zero. New legislation proposed by the Scottish Government will set targets to require 2.4 million homes to convert to cleaner heating systems by the end of 2045.</p> <p>Installing low carbon technologies can be costly and it is essential that effective consumer protection frameworks are in place to properly support households as they upgrade their properties.</p>	<p>We will build on prior work, including our investigation into the market for low carbon technologies and energy efficiency products in Scotland, and published research. We will continue to advocate for improved incentives, information and protections for consumers across the energy efficiency and low carbon technology landscape. We will engage with Scottish Government, including through our membership of the Heat in Buildings Strategic Advisory Group, and with other key stakeholders as we deliver this work.</p>	<p>The energy efficiency and low carbon technology markets and supporting landscape better reflect consumer needs.</p> <p>There is an increased understanding of what consumers require in order to make the changes being asked of them.</p> <p>Actions are taken to streamline and improve the consumer journey, raising the standards of advice, protection, and redress, thereby elevating overall consumer confidence.</p>	<p>Consumers in Scotland are able to make improvements to their homes to improve energy efficiency and reduce emissions.</p> <p>This will be done in a way that protects consumers from harm, builds confidence in the market and enables them to contribute to the achievement of Net Zero targets, benefitting consumers today and in the future.</p>

Trustworthy, High Quality Services and Products

An improved system for preventing and dealing with water debt

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Previous research found that 1 in 5 consumers in Scotland were in debt for water and sewerage services. A contributing factor to this figure is the lack of clarity about how water and sewerage charges are billed and paid for. These charges are administered through the Council Tax system, but low income consumers who are exempt from Council Tax often do not realise that they still need to pay part of the water charge and subsequently end up in debt. Debt recovery practices, which can require indebted consumers to pay their full annual charge immediately can cause real detriment to affected consumers.</p>	<p>Consumer Scotland has previously recommended that improvements are made in the information provided to consumers on water charges; and in how affordability is assessed when debt recovery practices are implemented.</p> <p>We will undertake further advocacy on these issues in 2025-2026, working with Scottish Government Scottish Water, COSLA and other key stakeholders. We will examine opportunities to capture and present up-to-date data on the current level and nature of water debt amongst consumers in Scotland.</p>	<p>Clearer information to be provided to consumers about how their water and sewerage charges are billed. In particular, action to be taken to ensure that those exempt from Council Tax due to their financial circumstances have greater visibility of their water charge liabilities.</p> <p>Greater consideration to be given to consumers' ability to pay when debt recovery charges for water debt are implemented. Scottish Water to take a more prominent role in working with local authorities to address these challenges experienced by water customers.</p>	<p>Consumers, particularly those on low incomes, have a better understanding of how water and sewerage charges are administered and are clear about their liabilities for these.</p> <p>Consumers who experience water debt are able to repay this in a way that works effectively for them and does not cause them harm.</p>

Trustworthy, High Quality Services and Products

A water market that works for non-domestic consumers

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>The water market in Scotland for non-domestic consumers is a competitive market, with businesses able to choose from a range of different water suppliers.</p> <p>Evidence has found however, that the current arrangements do not always deliver effectively for business consumers. Problems occur in relation to issues including customer service quality and redress, while limited switching between suppliers is currently taking place, reducing the potential consumer benefits of competition and choice.</p>	<p>Over the past two years Consumer Scotland has supported the development of a first Code of Practice for providers in the non-household market, to respond to the current challenges in the sector and help deliver improved consumer outcomes.</p> <p>In 2025-2026 we will support the implementation of this code, and a wider assurance framework, working closely with the industry and the Water Industry Commission for Scotland. Our work will include advocacy to address key issues identified through new consumer research to test the code, which will be completed in spring 2025.</p>	<p>Business consumers of water services in Scotland to receive a higher quality of service. Consumers to have better information on the merits of different providers and are able to differentiate more clearly in order to choose the provider that best meets their requirements.</p> <p>Switching between providers to occur more frequently to drive ongoing improvements across the sector.</p> <p>Further opportunities to enhance the Code to be considered by policy makers.</p>	<p>Non-domestic water consumers receive the services they need,. They benefit from affordable prices, good quality customer service and improved information to enable them to differentiate between suppliers, driving continuous improvement and improved consumer outcomes across the sector.</p>

Trustworthy, High Quality Services and Products

Decarbonised postal markets that deliver for consumers

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>The transport sector is the most significant contributor to emissions in Scotland. Postal markets are important part of this, as most letters and parcels in the UK are transported by road freight. While letter volumes have declined during the past decade, parcel volumes have grown significantly. Nearly 4 billion parcels were sent in 2023-24, a figure which has more than doubled in the past decade. Consumers currently have very little information about the emissions involved in their parcel deliveries and have limited opportunity to choose the most environmentally friendly delivery options.</p>	<p>We will build on our substantial report on this issue published in 2024-2025 and deliver a programme of advocacy activity to advance the recommendations we have put forward. We will engage with the regulator, government and parcel operators to identify opportunities for change.</p> <p>We will further consider the differential impacts of decarbonisation on the experiences of consumers in different parts of Scotland and we will continue to engage with and advocate for small business consumers in this market.</p>	<p>Postal operators, Ofcom and governments to have a greater understanding of, and give more consideration to decarbonisation of postal deliveries and its relevance to consumer access, information and choice. This will include the needs of small business consumers.</p> <p>Better information to be provided to consumers on the environmental impacts of different delivery options.</p> <p>Parcel operators to be incentivised to develop more carbon neutral methods of delivery.</p>	<p>Consumers are enabled to make environmentally-friendly choices a core part of their use of the parcel market, benefitting current and future consumers. This experience will be affordable and convenient for consumers.</p>

Trustworthy, High Quality Services and Products

Public transport options that consumers want to choose

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Public transport is a key market for consumers in Scotland, enabling access to many other goods and services. Increased public transport use is a central part of the Net Zero transition, with around 41% of transport emissions coming from private car use. Consumers can experience difficulties accessing affordable and convenient public transport; they can find it difficult to plan and pay for travel across differing modes and operators; and significant increases in passenger numbers as part of the Net Zero transition will also likely require significant change to services and infrastructure.</p>	<p>Consumer Scotland undertook initial analysis on specific aspects of public transport policy in 2024, including a review of National Concessionary Travel Schemes. We will undertake further analysis in 2025-2026, to examine evidence on consumer travel behaviours, views and experiences. We will set out the key consumer trends, challenges and requirements in public transport over the next 10 years. We will deliver advocacy activity to provide our findings to key stakeholders and we will work closely with these stakeholders, including Scottish Government and Transport Scotland.</p>	<p>Policy makers in Scotland to have an increased understanding of and commitment to responding to the interests of all consumers in developing public transport policy responses and interventions.</p> <p>Public transport options to be developed which are focused on current and future consumer needs, support the removal of barriers to sustainable transport options, and help make transport options more accessible and convenient for consumers.</p>	<p>Public transport services will become more affordable, convenient and attractive to consumers, increasing their uptake. This will deliver positive benefits for consumers in supporting economic activity, access to goods and services and supporting the transition to Net Zero.</p>

Trustworthy, High Quality Services and Products

Improved consumer protection from product harm

The problem or opportunity we're seeking to address	What we are going to do and who we'll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>There are cases where safety problems with a consumer product are identified after it has entered the market. In these cases this product may be recalled by the manufacturer and consumers provided with a refund, repair or replacement. Several hundred such recalls were issued in the UK in 2024. Ensuring consumers in Scotland can access a public recall of goods database is a statutory duty of Consumer Scotland. The Office of Product Safety Standards (OPSS) operates a UK-wide public database and it is important that the relevant information is widely shared amongst consumers in Scotland.</p>	<p>Consumer Scotland has established a partnership with the Office of Product Safety Standards.</p> <p>We will continue to work with OPSS to ensure our messaging around product safety and recalled goods is joined up and to ensure key organisations across Scotland are included in the OPSS notification system.</p> <p>We will also continue to promote all communication issued by OPSS and we will create a more user-friendly product recall of goods section on our own website.</p>	<p>More information on steps to take when having purchased a faulty good will be made available to consumers in Scotland.</p> <p>Consumer Scotland's website to provide a central point of information for consumers in Scotland who have issues with recalled goods or products.</p>	<p>Consumers will be more aware of any issues relating to purchased faulty goods and have a firm understanding of advice on what steps to take when they find themselves in receipt of a faulty good.</p> <p>The consumer journey in relation to product recall will be more straightforward, reducing complexity for consumers.</p>

Consumers at the Heart of Scotland’s Society and Economy

Public bodies delivering for consumers

The problem or opportunity we’re seeking to address	What we are going to do and who we’ll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>The term ‘consumer’ is historically associated with the purchase of goods or services from businesses. However, public service users are also consumers and this definition is set out in the Consumer Scotland Act 2020. The Act also introduced a new ‘consumer duty’ requiring public bodies to take account of consumers in strategic decisions. The duty came into force in 2024. As a new duty, ongoing action is needed to further embed a clear focus on consumer principles in public body decision-making.</p>	<p>Consumer Scotland published draft guidance for public bodies on how to implement the consumer duty in March 2024 and we will publish final guidance following our public consultation. In 2025-2026 we will run awareness sessions for public sector bodies on how to meet the requirements of the duty and for third sector organisations and the public on how to use the duty to influence public body decision-making. We will also use the duty to support our advocacy work across relevant services.</p>	<p>Public bodies in Scotland to have a clearer understanding of how the consumer principles apply to users of their services.</p> <p>Public sector decision makers to deliver better informed policies with the needs of consumers fully considered.</p> <p>Consumer groups and the public to be more empowered to actively participate in the public policy design process.</p>	<p>The needs of consumers will be at the centre of public policy making leading to more positive outcomes for them through the delivery of more effective services.</p>

Consumers at the Heart of Scotland’s Society and Economy

Consumer insights driving decision making

The problem or opportunity we’re seeking to address	What we are going to do and who we’ll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>The issues that consumers face evolve rapidly, driven by factors as diverse as: the broader economic context; new technologies and products; and changes to policy and regulation.</p> <p>It is important to understand how the nature of these consumer issues is evolving over time, in order that policy-makers and consumer advice organisations have a robust and up-to-date picture and can respond appropriately.</p>	<p>We will undertake a programme of robust research and analysis to examine how consumer issues are evolving, and the nature and extent of those issues. Our insight will be made public through a series of “insight reports” considering specific issues. This work will often be responsive to topical issues as they arise, but will also consider longer term problems.</p> <p>We will also develop plans for the Consumer Welfare Report 2026. This will involve developing and piloting a new survey of consumers in Scotland.</p>	<p>Our work will raise the profile of consumer issues in public debates; importantly, it will also raise the quality and robustness of evidence that is used to inform those debates.</p>	<p>Good quality, well-founded policy discussions and debates are the cornerstone of good policy development. By informing ongoing debates, our work will help ensure that policy adapts to meet the needs of consumers.</p>

Consumers at the Heart of Scotland’s Society and Economy

A cross-market approach to delivering more affordable services

The problem or opportunity we’re seeking to address	What we are going to do and who we’ll work with	What do we want to be done differently as a result	The impact this would make for consumers
<p>Affordability policy works differently in different markets for essential services. Across markets in combination, affordability policy is disjointed and inconsistent, resulting in gaps in provision and many consumers not receiving the support they may be, or should be, eligible for.</p> <p>There is a need for more consistent and better joined-up approaches to affordability across markets, ultimately ensuring that affordability support reaches more of the consumers who need it.</p>	<p>We will undertake policy modelling to understand how affordability needs map across different markets, and to examine the scope for more consistent eligibility criteria.</p> <p>We identify improvements that could act as drivers for more consistent policy, for example by understanding the requirements for and challenges to better data-sharing between different partners. We will work with relevant stakeholder organisations including government, regulators, suppliers and consumers to understand aspirations and challenges.</p>	<p>Policy makers to have increased understanding of options to deliver more joined-, up and consistent approaches to identifying the consumers who face affordability challenges in different markets, and in how support may be provided to those consumers.</p> <p>There will be increased understanding of the constraints and challenges of the proposed options, both in terms of cost, administration, and deliverability and of how these can be addressed.</p>	<p>Affordability policy across markets will work better for consumers, by making receipt of support better targeted at the consumers who need it, reducing the burden on consumers of claiming support, and reducing the likelihood that the consumers who need support will miss out.</p>

3. Our Supporting and Scoping Work

Alongside the priority workstreams described above, Consumer Scotland will also undertake a range of supporting work in 2025-2026 to represent the interests of consumers across markets and services.

The world that consumers engage in can change and evolve rapidly. We have identified a number of areas that we anticipate giving attention in future years due to their importance to consumers. We will also spend time in 2025-2026 scoping a small number of these potential areas of activity further.

Details of our supporting and scoping work for 2025-2026 are provided in the tables below.

Supporting Work

Market Area	Activity	Description
Cross-Market	Consumers and Net Zero	We will continue to use the findings from our research to advocate for the needs and priorities of consumers in the transition to Net Zero. We will seek to ensure that the upcoming Climate Change Plan fully considers both current and future consumers.
Cross-Market	Fairer markets	We will publish a report on the experiences of disabled consumers in rural areas following the conclusion of our 2024-2025 research on this issue and undertake dissemination and advocacy activity to support this work. We will explore potential research gaps across topics affecting consumers in vulnerable circumstances.
Cross-Market	Regulations that deliver positive consumer outcomes	We will engage with issues outside of priority workstreams that are ad hoc, require rapid response, or provide opportunities for us to use the existing evidence base to advocate for consumers. This may include work on issues previously explored. It also includes delivering input on development of regulatory measures and engaging with stakeholders both bilaterally and through working groups, including the Regulatory Review Group, Consumer Protection

		Partnership, and Communications Consumer Panel stakeholder and advocacy hubs.
Consumer Markets	A consumer-centred system for legal services	We will continue our advocacy activity on the Regulation of Legal Services Bill as it progresses through Parliament, representing consumers' interests in the design of this legislation. We will continue our membership of the Scottish Legal Complaints Commission Consumer Panel and seek opportunities to use our existing research and stakeholder knowledge to advocate for better consumer outcomes, including input into any implementation work arising from the Bill.
Energy	Energy tracker survey	We record and analyse consumer experience of energy markets through our energy tracker, with a controlled sample representative of the population of Scotland. We will continue to run the tracker annually to add to our understanding of changing consumer experience over time.
Energy	Stakeholder engagement	We will contribute to a wide range of both regular and ad hoc meetings and delivery groups with Scottish and UK Governments, the regulator, consumer advice stakeholders and industry partners, to represent consumer interests. We will continue to participate in key stakeholder forums.
Energy	Responsive retail market engagement	We will contribute evidence and insights to key consultations and calls for information in the energy retail market, from government, parliament and the regulator, as these emerge during the year.
Energy	Metering	Ahead of the Radio Teleswitch Service (RTS) switch-off in June 2025, we will continue to play a role in facilitating action and disseminating information across key stakeholders in the sector, including through our participation in the Ofgem RTS working group.
Energy	Markets and systems	We will engage with a range of processes to represent consumers' interests in proposed changes to energy markets and systems. This will include ongoing engagement with the Review of Electricity Market Arrangements (REMA); gas and electricity network price controls; and working with the NESO in strategic partnership.

Post	Tackling post exclusion	We will continue to work with Royal Mail, Post Office Ltd, UK Government and other consumer bodies to identify and implement solutions to post exclusion for those consumers with no fixed address.
Post	Post Offices	<p>We will monitor the data provided to us by Post Office Ltd on the post office network, including location, type of branch and business mix. We will publish a report with our analysis of the audited Post Office data and our assessment of its implications for consumers.</p> <p>We will also engage with the expected UK Government Green Paper on the future of the post office network.</p>
Research and Analysis	Strengthening the evidence base	We will continue to work to improve the quality and quantity of evidence available to Consumer Scotland and stakeholders. This includes our ongoing participation in the ScotStat Board, the operation of our framework agreements which support Consumer Scotland's survey research and research with consumers in vulnerable circumstances, and working with partners to access and understand their data to ensure a holistic picture of the consumer experience is available.
Water	High-Level Group and Strategy Group	We will continue to represent consumers' interests in key strategic groups in Scotland's water sector, including the High-Level Group and the Strategy Group.
Water	Future Investment Group	We will work with key water sector stakeholders to provide advice to the Scottish Government that will help shape the Ministerial Objectives for 2027-33.
Water	Future Charging Group	We will work with key water sector stakeholders to provide advice to the Scottish Government that will help shape the Principles of Charging for 2027-33.
Water	Private Water Supplies connections project	We will support the Scottish Government to test connection of communities on private supplies to the water mains and how this may be achieved.
Water	Understanding the consumer experience	Building on our work on consumer complaints in 2024-2025, we will continue to develop our approach to mapping data and evidence on the consumer experience of Scotland's water sector. We will continue to examine existing data to identify key

		issues, gaps and emerging trends across the range of issues that matter to consumers. We will engage with key water stakeholders to help identify actions emerging from this work that can help to drive consumer improvements.
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Scoping Projects

Market Area	Title	Description
Cross-Market	Improving pathways to redress	We will undertake scoping work to identify and assess the key issues affecting consumers in Scotland who seek to resolve issues with goods and services. This may include analysis of advice data, mapping of consumer journeys, and stakeholder workshops. We may consider more informal routes to redress such as signposting and advice, support from trade bodies and ADR providers as well as more formal legal routes such as the use of simple procedure.
Consumer Markets	Current issues affecting consumers of financial services	We will conduct scoping work examining the experiences of consumers in Scotland who access financial services, disaggregating findings from the wider UK experience where possible. This will inform future areas of work and allow us to advocate for improved outcomes for consumers in Scotland.
Energy	Reducing household electricity costs through technology	There is emerging evidence that combinations of solar PV, domestic storage batteries and 'time and type of use' tariffs can reduce electricity costs for consumers but further data is required on full potential and impact of these. During 2025-2026 Consumer Scotland will consider opportunities to undertake exploratory work and analysis to consider scenarios for different household types and electricity use patterns.
Energy	Local energy strategic planning	We will develop a programme of work to build understanding of, and support for, the role of local strategic energy planning in supporting communities to engage with an benefit from the transition to an energy system to support Net Zero. In 2025-2026 we will review local area energy planning and policy in Scotland, and compare the

		experience in Scotland with the approaches taken in other GB nations and regions.
Heat Networks	Understanding consumer experiences of pre-payment meters (PPM) for heat networks	We will carry out research exploring heat network consumers' experiences of pre-payment meters. This will build on our understanding of PPMs from the gas and electricity market. This research will help us to understand what consumers think about PPMs, which are increasingly being installed by default on heat networks. This will help us to develop a set of clear recommendations on the use of PPM for heat networks which will support us to advocate effectively on this issue as the rollout for heat networks ramps up.

4. Leading the Consumer Landscape

As the statutory consumer body, an important aspect of Consumer Scotland's role is to provide leadership across Scotland's consumer landscape.

We work in close partnership with other consumer organisations in Scotland to fulfil this role, recognising the unique roles, contributions and strengths that each organisation has to play.

Convening the consumer landscape

We will continue our work in 2025-2026 to convene the consumer landscape in Scotland through shared forums and networks, to develop joined up approaches and deliver outputs and activities that help to improve outcomes for consumers.

Our work will include activity on scams prevention and awareness and we will work with partners to advance this issue during 2025-26.

As described above, the key groups that Consumer Scotland will continue to lead in 2025-2026 will include:

- The Chief Executives Consumer Leadership Group
- The Consumer Network for Scotland
- The Energy Consumers Network, which also serves as a Strategic Leadership Group of the First Minister's Scottish Energy Advisory Board

Investigations to reduce harms and build consumer confidence

Through our landscape partners, we gain critical evidence and insights into the factors that damage consumer confidence or negatively impact their interests. Over the next year, we will focus on deepening these collaborative relationships, expanding our evidence base, and launching targeted investigations into the sectors or practices that cause the greatest harm to consumers in Scotland.

Putting consumers at the centre of Scotland's approach to climate change

A focus on the role of consumers in climate change adaptation and mitigation is one of Consumer Scotland's strategic priorities for 2023-2027. During the past two years we have produced a wide ranging body of evidence on this issue, across several consumer

markets. From this work, we have built a clear set of principles to inform future legislative, regulatory and policy interventions, providing an overarching framework for such interventions to respond to consumer priorities and needs. We will continue our work in 2025-2026 to build a clear, public consumer narrative on this issue, working with stakeholders from across the consumer landscape, government, regulators and industry.

Strategic funding partnerships

Consumer Scotland will engage in a number of strategic partnerships in 2025-2026 to support the delivery of a range of activities that will deliver benefits to consumers in Scotland.

Details of these partnerships are provided in the table below.

2025-2026 Strategic funding partnerships

Activity area	Name of partnership organisation	Partnership description
Consumer advocacy	Citizens Advice Scotland	Consumer Scotland will administer the Citizens Advice Scotland consumer advocacy grant in 2025-2026. This funding relationship allows us to set the strategic direction for CAS' operational delivery and ensure that the work of both organisations is streamlined and value for money.
Consumer advocacy	Citizens Advice (England and Wales)	Consumer Scotland will administer the Scottish element of GB-wide consumer advocacy activity in gas, electricity and postal sectors that is delivered by Citizens Advice. We will work in close partnership with Citizens Advice to achieve effective alignment, complementarity and value for money in the delivery of this work.
Consumer advice	Advice Direct Scotland	Consumer Scotland will administer the Consumeradvice.scot grant to Advice Direct Scotland in 2025-2026. This partnership will allow us to better align our strategic advocacy with the delivery of advice services
Big Energy Savings Network and Worried this Winter Campaign	Citizens Advice Scotland	We will continue to work in partnership with Citizens Advice Scotland to enable the delivery of 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. Advisers funded through the project provide group sessions and one to one energy advice to consumers. They also provide

		<p>group sessions to frontline workers so they can give direct help and advice to consumers to help them stay warm and lower their energy bills while maximising their incomes.</p> <p>The Worried This Winter campaign raises awareness of the support available to anyone worried about the rising cost of energy and keeping their homes warm during the coldest months of the year.</p>
Heat Networks – Tier 1 Advice	Advice Direct Scotland	Consumer Scotland will enter into a partnership agreement with Advice Direct Scotland for ADS to deliver Tier 1 consumer advice on heat networks in Scotland from 2025-2026.
Heat Networks – Tier 2 Advice	Citizens Advice Scotland (Extra Help Unit)	Consumer Scotland will enter into a partnership agreement with Citizens Advice Scotland for the EHU to deliver Tier 2 consumer advice on heat networks in Scotland from 2025-2026.

5. Delivering our Programme

Governance

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

We lay our forward Work Programme and our Annual Report in Parliament and we give evidence on our performance at the Economy and Fair Work Committee. Our research reports and other outputs are provided to Parliamentary Committees, the Scottish Parliament Information Centre and the House of Commons Library.

Our relationship with the Scottish Government is governed through our Framework Agreement, setting out our respective roles and responsibilities. This is published on our website.

We have a five-person Board who govern the organisation and work with the Chief Executive and Accountable Office to provide scrutiny, challenge, advice and strategic direction. Our Audit and Risk Committee advises the Board and Accountable Officer on risk, control and governance and the annual report and accounts. Our Advisory Committee on Consumers in Vulnerable Circumstances, which is chaired by a Board member, provides advice to our senior team on our work in relation to consumers in vulnerable circumstances. The minutes from our Board and Committee meetings are published on our website.

Managing and Measuring our Performance

Managing our work and developing our team

Across our work programme we aim to dedicate the right mix of skills, resources and powers at our disposal to each of our areas of activity. We work in a multi-disciplinary way, drawing in appropriate expertise from across the organisation. As a relatively young organisation, we are continually exploring new approaches to share learning across our team and to help build our skills and expertise in order to help secure positive outcomes for consumers.

Working across multiple consumer markets gives us a unique perspective on consumer issues. We seek to draw on this cross-market learning and experience to strengthen our work, delivering greater value and impact for consumers.

The workstreams set out in our Draft Work Programme represent activities that vary in nature, in terms of their capacity, complexity and timescales. We seek to resource

each activity appropriately, and we will make choices during the year about how to prioritise our work most effectively in order to maximise impact for consumers.

We will remain alert to issues affecting consumers that emerge or grow in importance during the year. We will respond to these issues where possible and appropriate, adapting our pre-planned work as required to deliver this work.

Measuring our impact

Our Performance Framework, published in 2023, sets out how we track our impact and performance. The Framework includes Organisational Activity Indicators; Outcome progress monitoring across our workstreams; a Recommendations Register; and Impact Reviews.

As an advocacy organisation, we understand that impact is generally not linear and involves the involvement of a range of stakeholders. We use contribution analysis to assess our role in helping to achieve positive change for consumers, reflecting the complexity of the markets and sectors in which we operate.

We report on our impact through our Annual Report and Accounts, which we lay before the Scottish Parliament, and which are subject to independent audit. In 2025-2026 Consumer Scotland will commission an independent review of our performance, which will consider our first three years of operation.

Our work contributes to the achievement of the National Outcomes in Scotland's National Performance Framework. The active engagement of consumers in the economy and society helps to deliver each of the National Outcomes, which are further enhanced when policymakers put the interests of consumers at the centre of their decisions. We are pleased that the refreshed National Outcome on the Wellbeing Economy and Fair Work includes reference to consumers for the first time, following our work on this issue.

Our Communications

Communicating the evidence and our recommendations widely is a core part of our work. Our Communications Strategy sets out the objectives of our communications approach:

- Improve outcomes for consumers by extending the reach and impact of Consumer Scotland's research, analysis and policy recommendations with key decision-makers
- Raise awareness of the key issues of importance to consumers in Scotland
- Increase awareness and understanding of Consumer Scotland and its remit
- Increase Consumer Scotland's influence and demonstrate our positive impact on the lives of consumers across the range of markets we cover

- Strengthen relationships with stakeholders and develop collaborative working to maximise impact
- Raise awareness of where consumers can get access to the information they need
- Raise awareness of the consumer duty and how the relevant public bodies can meet the duty

We keep stakeholders and consumers informed about our work, including our research and recommendations, through our website, social media, mailing list and mainstream media. In 2024 we launched the Consumer Scotland newsletter, which we will continue in 2025-2026. We will also continue this year to develop our communications approach, to continually extend our reach, recognition and reputation. This work strengthens our advocacy and ultimately helping to secure better outcomes for consumers.

Public Service Reform

Consumer Scotland is committed to the public service reform agenda. We work closely with other public bodies across Scotland to maximise the efficiency of our operations and the effectiveness of our work.

We currently share premises in Edinburgh with Environmental Standards Scotland (ESS), based at the headquarters of the Scottish Legal Aid Board. In Glasgow, we share premises with the Registers of Scotland. Our co-location with ESS was a new arrangement in 2024-2025 and we aim to use this arrangement to identify efficiency savings in future years, and to support increased learning and sharing of expertise across the two organisations.

We continue to participate as active members of the Scottish Delivery Bodies Group, where we work with other public bodies to share experiences and work collaboratively on public sector reform opportunities.

Funding

Consumer Scotland receives general funding from the Scottish Government's annual budget, which is approved by the Scottish Parliament. For 2025-2026 our proposed general resource funding is £3.525 million, which includes £950,000 to support the Citizens Advice Scotland Consumer Advocacy work plan.

We also receive funding for research and advocacy activity in electricity, gas, heat networks, post and water sectors. This funding is provided via levies, which are derived from consumers' bills and which are administered by the UK and Scottish Governments.

Our levy funding requirements for 2025-2026 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
- The Scottish element of GB-wide consumer advocacy activity in gas, electricity and postal sectors, which is delivered by Citizens Advice

Consumer Scotland is committed to working effectively and efficiently to maximise the value of the investment in our work for consumers.

During 2025-2026 we will continue to build strong relationships with and work closely with stakeholders from across the consumer landscape in Scotland, England and Wales and Northern Ireland, to achieve positive outcomes for consumers, share learning and avoid duplication.

We operate in line with the Public Finance and Accountability (Scotland) Act 2000 and we follow the best practice guidance in the Scottish Public Finance Manual. Our accounts are externally audited, and this audit is commissioned by Audit Scotland. Our Annual Report and Accounts are laid before the Scottish Parliament.

Levy funding 2025-2026

	Energy	Heat Networks	Post	Water	Consumer	Directorate
Programme	120,000	30,000	68,300	198,800		
Staffing	620,965	247,622	150,027	280,483		
Staff-related costs	57,200	22,800	15,100	25,800		
Tier 1 and Tier 2 Advice		500,000				
Big Energy Savings Campaign and Network	325,300					
Scottish Contribution to GB-wide advocacy work delivered by Citizens Advice	161,565		33,737		67,355	10,272
Total	£1,285,030	£800,422	£267,164	£505,083	£67,355	£10,272

*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.

Appendix – Breakdown of Projects by Levy Area

	Priority Workstreams	Supporting Work	Scoping Projects
Energy	A future energy retail market designed for consumers	Energy tracker survey	Reducing household electricity costs through technology
	Electric Vehicle infrastructure that works for all consumers	Stakeholder engagement	Local energy strategic planning
	An energy efficiency system that delivers for consumers	Responsive retail market engagement	N/A
	A new approach to energy affordability	Metering	N/A
	N/A	Markets and systems	N/A
Heat Networks	A heat network market that works for consumers	N/A	Understanding consumer experiences of pre-payment meters (PPM) for heat networks
Post	Securing a universal postal service that delivers for consumers in Scotland	Tackling post exclusion	N/A
	Equitable postal services for Scotland's islands	Post Offices	N/A
	Postal Service 2040: Designing a consumer-centred future service	N/A	N/A

	Decarbonised postal markets that deliver for consumers	N/A	N/A
Water			
Water	Fair and affordable water charges	High-Level Group and Strategy Group	N/A
	A strategic water investment programme shaped by consumers	Future Investment Group	N/A
	Consumers at the centre of a climate resilient water sector	Future Charging Group	N/A
	An improved system for preventing and dealing with water debt	Private Water Supplies connections project	N/A
	A water market that works for non-domestic consumers	Understanding the consumer experience	N/A