

**Consumer  
Scotland**

Luchd-Cleachdaidh Alba

# Summary of Responses to Consultation on Draft Work Programme 2025-2026

March 2025

# Introduction

1.1 In developing our annual Work Programme for 2025-2026, Consumer Scotland sought formal feedback on a Draft Work Programme. Consumer Scotland is committed to openness and transparency as fundamental tenets of our work, and seeking feedback on our Draft Work Programme is critical to ensuring that our activities deliver meaningful outcomes for consumers.

1.2 Feedback on our Draft Work Programme also helps to ensure that our activities in 2025-26 add value to, but do not duplicate, the work of other advice, regulatory and enforcement bodies.

1.3 This document summarises responses to the consultation on our Draft Work Programme for 2025-26. The consultation period ran for four weeks in January and February 2025.

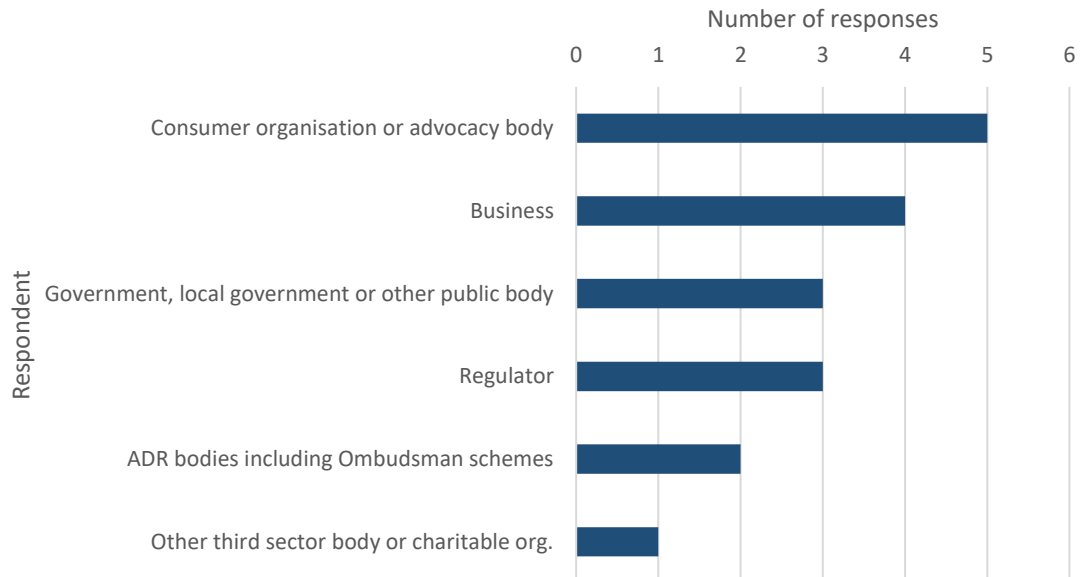
1.4 The Draft Work Programme sets out our priorities for the coming year across a range of sectors including gas and electricity, heat networks, water and postal services. It also covers key markets in the wider economy and our cross-market work. It summarises how we intend to work towards the achievement of certain consumer outcomes through our priority workstreams and our supporting and scoping activities.

1.5 Feedback from the consultation on the Draft Work Programme has been used to inform Consumer Scotland's final Work Programme, which has been published alongside this document, and laid before the Scottish Parliament.

1.6 We received 18 formal responses to our consultation and the content of our Draft Work Programme was also discussed at bilateral meetings with some stakeholders. The feedback came from a range of organisations (see Chart 1 below) and we are grateful to all those who provided feedback. The organisations that formally responded to the consultation are listed in Appendix 1.

### Chart 1: Respondents by category

Number of respondents to Consumer Scotland’s consultation on its 2025-26 Work Programme, by category of respondent



1.7 The feedback received during the consultation process has provided generally strong support for the proposals set out in the Draft Work Programme.

1.8 Respondents offered broad support for our overarching consumer outcomes and nearly all expressed a desire to collaborate with Consumer Scotland in the co-delivery of the proposed activities in the Draft Work Programme. A number of respondents highlighted the positive working relationship that they already have with Consumer Scotland and committed to continuing to work closely with us during the year ahead.

1.9 Notwithstanding the broad support, one theme that emerged was the importance of ongoing close collaboration and regular dialogue with stakeholder organisations to avoid unnecessary duplication of effort. This is feedback that we have taken on board in previous years and will do so again in 2025-26.

1.10 The rest of this document summarises the more specific responses to our draft work programme, structured according to the overarching consumer outcomes that Consumer Scotland is working towards and reference is made throughout to the component workstreams and our supporting and scoping activities.

## Consumer Outcome: Fair and Affordable Markets

1.11 There was general support for our strategic focus on working towards the creation and maintenance of markets that are fair and affordable for all consumers, including those in vulnerable circumstances.

1.12 A large number of consultees provided feedback on the priority workstreams that we intend to undertake in pursuit of this consumer outcome. A range of views were expressed in relation to our proposed work on energy, water, housing, small businesses and postal services.

## Energy

1.13 There was generally strong support for our proposed work on formulating a “new approach to energy affordability”. Many respondents said this focus was especially important in the context of forthcoming regulations in relation to heat networks and district heating schemes and the need to protect these consumers from price increases that could occur in a more profit driven energy supply market. There was also support for our aim to better understand the experiences of heat networks consumers who use prepayment meters in order to better understand affordability issues and consumers’ preferences in relation to payment methods.

1.14 One respondent suggested that it was important not to “silo” heat networks consumers in the context of our work on energy affordability. This is due to the fact that heat networks consumers will not differentiate themselves from other energy consumers in relation to affordability concerns. The respondent also drew attention to the fact that heat network consumers do not currently benefit from Ofgem price cap protections.

1.15 There was strong support for our continued focus on improving the help available to consumers who are experiencing fuel poverty – this could mean making energy bills more affordable and/or helping people to manage energy debts.

1.16 One respondent drew attention to the need for wider decarbonisation/net zero transition initiatives to take into account the affordability concerns of low income consumers and those in vulnerable circumstances in particular.

1.17 Many consultees commented favourably on our proposed workstream on designing a future retail energy market for consumers and expressed a strong desire to collaborate with Consumer Scotland. One respondent suggested that collaboration would be very important for the development of principles that inform the future design of the energy retail market in ways that meet the needs of current and future consumers, especially those in vulnerable circumstances.

1.18 One respondent emphasised the importance of strengthening the Scottish perspective and suggested collaborating with Consumer Scotland in relation to strategic energy planning, the Review of Electricity Market Arrangements and new infrastructure developments.

1.19 Some respondents pointed to a future energy retail market being inextricably linked to the transition to net zero and welcomed our proposed work in these areas as it recognises this important interaction.

## Water

1.20 Consultees with a particular interest in the water sector expressed support for our proposed focus on “fair and affordable water charges” and communicated a desire to build on recent and ongoing collaboration with Consumer Scotland.

1.21 Respondents commented on the challenges inherent in balancing general affordability with providing financial support for low income consumers and funding the infrastructure investments that will be necessary to maintain service levels and respond to the challenges posed by a changing climate.

1.22 One consultee suggested that consideration should be given to Consumer Scotland’s proposed market interventions that could help low income consumers - increasing the level of discount provided through the ‘Water Charges Reduction Scheme’ and implementing an affordability support ‘by application’ scheme. It was suggested that these potential interventions, and others, could be discussed in stakeholder forums to ensure that more vulnerable consumers are protected without placing undue financial burdens on other consumers.

1.23 Consultees commented favourably on Consumer Scotland’s intention to update its previous work on the affordability of water charges and felt that this could feed into the ‘Strategic Review of Charges 2027-2033’. Consumer Scotland’s involvement in the Strategic Review of Charges was considered to be very important in terms of ensuring that general affordability concerns and enhanced protections for low income consumers are taken into consideration.

## Housing

1.24 One respondent commented favourably on our focus on creating a “fairer housing rental market” but did opine that some of the issues in relation to the supply, affordability and condition of social rented housing is being addressed by other organisations and that collaboration would be required to avoid the duplication of effort. It was suggested that more of a focus on the private rented sector would be beneficial as these tenants appear to have fewer protections, and there is evidence of a power imbalance between tenants and landlords that can lead to private sector tenants struggling to secure adequate redress.

1.25 In addition to having more of a focus on consumer protection and inequality issues in the private rented sector, some further suggestions were made in relation to where our work could be directed. These included:

- Exploring the potential for enhanced consumer protections in relation to new house purchases and, in particular, “snagging” defects, general work quality and the management of unadopted open spaces and facilities in new developments.
- Consideration of how the regulatory framework for the private rented sector could be changed to support efforts to combat housing related serious and organised crime.

- Consideration of the appropriateness of current regulation for short term lets in view of the impact that this type of commercial activity can have on how secure residents feel in their homes

## **Small Businesses**

1.26 The focus on advocating for “markets that deliver for small businesses” was generally well received, especially in the context of how small businesses can face similar challenges to domestic consumers and can have difficulty securing effective redress.

1.27 In the context of the energy market, one respondent stated that access to the Energy Ombudsman had now been expanded to businesses with up to 50 employees (previously up to 10). It was suggested that the impact that this wider access has on the ability of small businesses to secure redress could be explored further in due course.

1.28 One respondent drew attention to small businesses having similar support and guidance needs to those of individual consumers in the context of sustainability policy goals and being able to make sustainable choices that are both convenient and affordable. It was suggested that Consumer Scotland could work collaboratively to help small businesses in this respect.

## **Postal Services**

1.29 Our proposed work in relation to a “universal postal service” was well received and respondents viewed forthcoming reforms to the universal service as an opportunity for collaboration that could lead to enhanced consumer protections and a more fit for purpose universal service.

1.30 One consultee raised some concerns in relation to the reliability and affordability of the current universal postal service with price increases and delayed deliveries being experienced by consumers in recent years. Therefore, the importance of the consumer having a voice in the ‘Universal Service Obligation’ review process was emphasised.

1.31 The importance of our proposed workstream on “providing equitable postal services for Scotland’s islands” was recognised by many consultees. Attention was drawn to the potential importance of maintaining a “one price goes anywhere” universal postal service and that any reforms to this existing requirement should be fully focused on affordability for consumers in more rural areas.

1.32 In the context of parcel deliveries, one respondent pointed to a lack of consumer choice in more rural areas of Scotland which has led to inflated prices. It was argued that there is often only one supplier for the “final mile” of the delivery in these areas which means that certain suppliers occupy a monopoly position and this can be reflected in consumer prices.

1.33 Attention was drawn to a lack of “out of home” collection points in rural areas of Scotland which further reduces consumer choice and can result in higher delivery costs.

1.34 One respondent called for a review of recent increases to the cost of ferries serving the islands of Scotland as this will lead to higher costs for parcel carriers that could feed through to rural consumers.

## Consumer Outcome: Investing for the Future

1.35 Several consultees provided feedback on the energy, water and postal services workstreams that are associated with this consumer outcome. Our proposed workstream in relation to a circular economy also received some comments. In addition, some specific research suggestions were made in relation to our ‘heat networks’ workstream and these are briefly outlined below.

### Energy

1.36 Respondents were supportive of Consumer Scotland becoming the statutory consumer advocate for heat network consumers in Scotland and expressed a desire to work with us as we perform this function.

1.37 There was support for our continued focus on "electric vehicle infrastructure" and finding ways to improve the infrastructure and support that is currently available in Scotland so that it is widely viewed by consumers as being accessible, effective and affordable. There was agreement that there is currently a lack of public charge points in the right locations and that public charging is typically much more expensive than charging at home. Our strong interest in the issues experienced by those who cannot charge at home was welcomed.

1.38 There was also support for our intention to monitor issues around the servicing and repair of electric vehicles and there was a suggestion that this focus could be extended to include used vehicles. Interest was expressed in Consumer Scotland sharing any findings it generates in relation to these aspects of electric vehicle usage.

1.39 Our work in relation to ‘heat networks’ attracted considerable interest and support, particularly in relation to consumer protection regulations and affordability.

1.40 The potential transition of the heat network supply market from a more “not for profit” one that is run by local suppliers to a more profit driven open market raised some concerns.

1.41 The importance of our work in understanding the role of prepayment meters (PPMs) for heat networks customers was emphasised as there could be an assumption that PPMs are universally undesirable and this may not in fact be the case. How PPMs are viewed by consumers in more vulnerable circumstances was deemed to be of particular importance.

1.42 Some respondents pointed to the potential risk that there may be a duplication of heat network advice for consumers and that Consumer Scotland, as the statutory advocate for consumers on heat networks in Scotland, should work with stakeholder organisations to try and ensure that consumers know who to contact and receive appropriate advice. In this respect, the proposal to establish a ‘Heat Networks Intelligence Group’ was welcomed.

1.43 One respondent emphasised the current lack of heat networks research and data and suggested that Consumer Scotland’s planned monitoring of the market could prove to be invaluable.

1.44 Our energy workstreams, and heat networks in particular, stimulated some suggestions in relation to additional work that Consumer Scotland could consider undertaking, including:

- Exploring the experiences of energy consumers in other European markets and how other countries have approached some important energy related consumer issues.
- Potential research into consumer experiences of heat network reliability in terms of the frequency and duration of unplanned outages. One respondent pointed to existing data that suggests that issues exist and suggested that further research in this area could benefit from a collaborative approach. Furthermore, it was suggested that findings from Scotland focused research could make the case for extending to Scotland (currently only available in England and Wales) the ‘Heat Network Efficiency Scheme’ that provides funding for improving the technical performance/reliability of existing heat networks.
- It was suggested that it would be valuable to research the interaction between proposed heat network regulations and Scottish housing legislation as there is a perception that a gap exists in policymakers’ understanding of how heat networks interact with Scottish housing law. It was proposed that such evidence could help to ensure that heat network regulations are appropriate for the whole of the UK and that advice services are properly equipped to help consumers.
- For any heat network research that is conducted in 2025, one respondent suggested that the research should aim to distinguish between the experiences of consumers who are and are not using ‘Heat Trust registered’ heat networks. The reason for this is that consumers who are not part of a registered network will continue to be less protected until such time as the regulator introduces statutory protection for all heat network users in 2026.

## **Water**

1.45 Our focus on ensuring the consumer’s voice is heard in relation to strategic investments in water infrastructure and the creation of a climate resilient water sector was supported by many consultees.



1.46 One respondent drew attention to how water infrastructure can interact with road infrastructure and suggested that some consideration could be given to greater collaboration between public bodies to promote integrated carbon reduction measures when public infrastructure works are carried out.

1.47 There was appreciation for Consumer Scotland's role in working with the Scottish Government to develop policies in relation to adapting water, waste water and drainage infrastructure and services to meet the future demands created by climate change.

1.48 There was agreement that ongoing engagement with consumers and communities is very important if there are to be successful consumer outcomes. More than one respondent expressed a desire to collaborate with Consumer Scotland to find ways of placing consumers at the centre of the transition to a sustainable water system and to explore how water efficiency might interact with wider energy efficiency initiatives.

## **Postal Services**

1.49 Our proposed work in relation to creating a consumer-centred future postal service was welcomed and it was suggested that stakeholder collaboration would be important in designing a postal service that is modern, reliable and sustainable. It was emphasised that good consumer outcomes must be a central aim of reforms to the 'Universal Service'.

## **Circular Economy**

1.50 The need for consumer understanding and empowerment in the ongoing transition to a more circular economy was emphasised. It was suggested that this aim could best be achieved through consumer organisations across the UK collaborating to better understand changes in consumer behaviours and the socio-economic drivers of a circular economy.

## **Consumer Outcome: Trustworthy, High Quality Services and Products**

1.51 In addition to a general recognition that efforts should be ongoing to better protect all consumers from substandard services and products, more specific feedback was received in relation to this outcome for our proposed work in the energy, water, postal and public transport markets.

## **Energy**

1.52 Our aim to create "energy efficiency markets that deliver for consumers" was widely supported and attention was drawn to the need for systemic thinking in pursuit of this goal.

1.53 One respondent stressed the need for increased “demand flexibility” so that the integration of different energy efficiency products allows consumers to engage with the wider energy system and exert greater influence over supply and demand.

1.54 Our concern in relation to the cost of installing low carbon heating systems and energy efficiency products was shared and our focus on affordability was welcomed, especially in the context of low income consumers and those in more vulnerable circumstances.

1.55 One respondent emphasised the importance of improving Scotland’s housing stock so that homes are warmer and easier to heat which in turn will lead to lower energy costs and carbon emissions. It was stressed that consumers need to have confidence that a low carbon heating system is a viable option for their home.

1.56 There was agreement that consumers need enhanced protections in relation to energy efficiency products and that access to advice and redress are essential if consumers are to participate fairly in the transition to net zero. It was suggested that there is currently a lack of accessible information and advice for consumers which exacerbates negative perceptions of high installation costs and discourages consumer adoption of energy efficiency measures.

1.57 One consultee commented on the confusing array of energy efficiency related consumer protection codes and schemes which can lead to consumer uncertainty about who to contact when there are installation or operational problems. It was also suggested that the current enforcement regime is not always sufficient to tackle rogue traders and provide adequate compensation to consumers.

1.58 There was support for our consumer-centric approach to ensuring that consumers in more rural areas of Scotland are not neglected and that their energy efficiency needs are taken into consideration by policymakers.

1.59 It was suggested that consideration should be given to the role that competitive markets have to play in encouraging and facilitating consumer adoption of energy efficiency products.

## **Water**

1.60 There was strong support for our focus on creating an “improved system for preventing and dealing with water debt”. In relation to this aim, attention was drawn to measures that are underway to improve the collection of relevant data that will allow stakeholders to better understand the nature and extent of water debt in Scotland.

1.61 Our recommendation that clearer information and communications should be directed to consumers who benefit from council tax relief, but are still liable for water charges, was generally supported. It was suggested that this could be fundamental to preventing some consumers from accumulating water debts as there can be an incorrect assumption that exemption from council tax equates to exemption from water charges.

1.62 It was suggested that Consumer Scotland could collaborate with Local Authorities and other stakeholders to explore ways in which consumers who are struggling to pay water charges could be better supported.

1.63 Many respondents were supportive of our focus on the non-domestic water market and our role as the chair of the non-domestic water market's 'Senior Stakeholder Group'.

1.64 The importance of encouraging non-domestic suppliers to adopt "Ethical Business Practices" and the development of the "Licensed Provider Code of Practice" was emphasised. There was a belief that Consumer Scotland has a very important role to play in these aspects of the non-domestic water market.

1.65 One respondent suggested some clarificatory amendments to our water workstream related wording and we will engage with this consultee directly.

## **Postal Services**

1.66 We received generally positive feedback in relation to our proposed work on "decarbonised postal markets".

1.67 One respondent suggested that "out of home" collection points have an important decarbonising role to play as they can reduce the number of delivery journeys and the volume of vehicles on the roads. However, the respondent pointed to geographical inequalities in Scotland in terms of consumers being able to access this service.

1.68 Our concerns were shared in relation to consumers having insufficient information around the carbon emissions involved in parcel deliveries and limited opportunities to choose lower carbon delivery options. Therefore, our proposed work around empowering consumers to be able to make informed decarbonising choices was welcomed.

## **Public Transport**

1.69 Our focus on improving consumer perceptions of public transport as a viable option was welcomed and the importance of further collaborative research in this areas was emphasised.

1.70 The importance of addressing issues that consumers experience when using buses and trains was stressed as these will need to be targeted if consumers are to be encouraged to substitute private cars for public transport.

## **Consumer Outcome: Consumers at the Heart of Scotland's Society and Economy**

1.71 The workstreams associated with this consumer outcome are more broad and cross-sectoral in nature so they typically attracted less feedback than the more market

specific workstreams. Nevertheless, our focus on “public bodies delivering for consumers”, “consumer insights driving decision making” and a “cross-market approach to delivering affordable services” was welcomed by some respondents.

1.72 It was suggested that the principles of the Consumer Duty that were introduced in 2024 will have an important role to play in guiding public bodies to deliver better outcomes for consumers. It was suggested that Consumer Scotland would have an important role to play in raising awareness of how the Consumer Duty applies to public bodies and how it is being implemented.

1.73 As alluded to in some of the more market specific workstreams, there was widespread support for our efforts to ensure that policymaking is influenced by consumer insights. There were calls for our research findings to be transparent and shared with all those who have an interest in this objective.

1.74 The focus on cross-market affordability was welcomed, especially in the context of those in the most vulnerable financial circumstances obtaining the support they need across a range of essential services. Views were shared that approaching affordability from a cross-market perspective could lead to the development of more consistent policy and practice.

## Supporting Work and Scoping Projects

1.75 Some of our planned activities that do not constitute priority workstreams for 2025-26 but are indicative of our longer term strategic objectives, received positive feedback.

1.76 Our interest in the creation of a more “consumer-centred system for legal services” was welcomed. One respondent suggested that public awareness of consumer rights and available redress schemes could be improved as consumers often do not know where to turn when they have issues with legal service providers and lack confidence that their concerns will be addressed. It was also suggested that consumers need better knowledge of both redress mechanisms and how to access alternative legal services providers.

1.77 Our focus on cross-market regulations was supported but attention was drawn to the need to consider the challenges that regulations can present to some cross-sectoral organisations. One respondent suggested that some organisations may have to divert limited resources to comply with certain market specific regulations to the extent that their activities in other consumer markets are neglected.

1.78 In the context of water, our interest in “understanding the consumer experience” was supported and there were requests for us to collaborate and share any insights that we generate.

1.79 There was notable interest in our planned activities in relation to “tackling post exclusion” and “post offices”, especially in the context of consumers in vulnerable

circumstances. A desire to collaborate in these areas was expressed by more than one respondent.

1.80 Our scoping project on “improving pathways to redress” generated substantial interest, particularly in relation to improving consumer awareness of, and access to, ‘Alternative Dispute Resolution’ schemes.

## General comments and recommendations

1.81 Overall, respondents were very supportive of the consumer outcomes and workstreams identified by Consumer Scotland and agreed that these captured some of the key issues currently facing consumers in Scotland. Many respondents indicated that their organisations were exploring similar issues, which offered a strong basis for collaboration. Some respondents suggested that collaboration was especially important in the context of avoiding duplication of effort and welcomed Consumer Scotland’s ongoing intention to regularly discuss its proposed work with relevant stakeholders.

1.82 There was widespread support and appreciation for Consumer Scotland’s ongoing efforts to engage consumers in the formulation of policies that could have a substantial impact on their lives, especially in the context of essential service provision and the transition to net zero.

1.83 Although they did not form part of the official consultation responses that have been summarised in this document, feedback from stakeholder meetings suggested that organising our work around consumer outcomes is a good approach as it allows us to focus on achieving meaningful change for consumers. However, there was also some comment on the scale of the work we were attempting to undertake in one year. We appreciate this feedback and are confident that we have the foundations in place to progress the proposed workstreams, many of which are multi-year undertakings that would not reach a conclusion in 2025-26.

1.84 Several respondents cited historic and ongoing collaboration with Consumer Scotland and commented on how well this had worked. There was specific support for Consumer Scotland’s convening and coordinating functions, such as our role as statutory consumer advocate for heat network consumers and our chairing of the non-domestic water market’s ‘Senior Stakeholder Group’. Many respondents expressed a desire for Consumer Scotland to continue to build its capacity to influence policy and regulatory developments across the consumer landscape in Scotland

## Annex A: List of formal respondents

Association of Local Authority Chief Housing Officers (ALACHO)  
Citizens Advice  
Competition and Markets Authority (CMA)  
Consumer Council for Northern Ireland  
Drinking Water Quality Regulator for Scotland (DWQR)  
Energy Saving Trust  
Heat Trust  
National Energy System Operator (NESO)  
Office of the Scottish Road Works Commissioner (SRWC)  
Royal Mail  
Scottish & Southern Electricity Networks (SSEN) Distribution  
Scottish Legal Complaints Commission  
Scottish Water  
Shetland Heat Energy & Power Ltd - the Lerwick District Heating Scheme  
Transport Focus  
Trust Alliance Group  
Water Industry Commission for Scotland (WICS)  
Yodel