

Consultation on reforming the WaterSure Scheme

21 July 2025

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Glossary and acronyms

AA - Attendance Allowance

AVC – Assessed Volume Charge. If a water company is unable to install a water meter at a property, they must offer the customer an assessed charge. This is an alternative to a standard unmetered charge. An assessed charge will not be offered unless a meter is applied for.

CCW – Consumer Council for Water. The statutory consumer organisation representing household and non-household water and sewerage consumers in England and Wales.

Defra - Department for Environment, Food and Rural Affairs

DLA – Disability Living Allowance

Ofwat – Water Services Regulation Authority, a non-ministerial government department established in 1989 when the water and sewerage industry in England and Wales was privatised.

PIP - Personal Independence Payment

Introduction

The government is committed to creating a fairer water system which better serves the interests of consumers. As such, on 30 March 2025 the Secretary of State for Environment, Food and Rural Affairs announced the intent to reform the statutory scheme WaterSure. This statutory scheme caps water bills for low-income customers with higher water usage due to medical conditions or large households.

These will be the first substantive reforms to the scheme since its introduction over 25 years ago. Proposed reforms include widening the eligibility for households with disabilities that lead to high water usage, and increasing the amount of support for some eligible households.

The Consumer Council for Water (CCW) – the statutory consumer representative body in the water sector – conducted a review of the WaterSure scheme which provided recommendations for improvements to it. These recommendations have been carefully considered by government, and alongside further engagement with industry, Ofwat and CCW, have been used to inform proposals in this consultation.

This consultation is seeking views of stakeholders in the water sector and parties or individuals who may be affected by the government's proposals to amend the WaterSure scheme as it applies within England.

An important component to effective targeting and take-up of WaterSure is data sharing. We are therefore also seeking views on how government and water companies can share data more effectively to better reach eligible customers.

Background

English water companies must each provide the statutory support scheme WaterSure. This is as set out in The Water Industry (Charges) (Vulnerable Groups) (Consolidation) Regulations 2015 ('the WaterSure Regulations').

The scheme currently supports households in receipt of a means-tested benefit who have higher essential water use due to either:

- a medical condition
- having 3 or more children in the household who are under 19 years old and in fulltime education

Households must either have a water meter, be waiting for a water meter, or be subject to an Assessed Volume Charge (AVC) because they are unable to have a meter installed.

WaterSure caps the household's water and sewerage bill at the average water bill for the water company's area. More than 200,000 customers in England received support from WaterSure in 2023 to 2024, receiving an average annual bill reduction of just under £300.

WaterSure is funded through a cross-subsidy from customer bills within each company region, with customers usually paying an additional £2 to £3 per year on their water bill to provide this support.

On 8 January 2025, CCW published recommendations to revise the WaterSure Regulations. They identified several issues with the scheme. These included the generosity of the scheme not being consistent across water companies, the limitations of support currently only going to disabled households on means tested benefits, and a lack of customer awareness of the scheme.

Data sharing

Data-sharing is a key component to achieving effective targeting of eligible customers and comprehensive take up of WaterSure. We want to enhance how government and water companies share data to ensure all eligible customers receive the support to which they're entitled.

Enrolling eligible customers can be challenging, particularly for customers who face barriers to submitting applications, such as disabled people or those who may be digitally excluded. It can also be hard for people to ask for help.

While water companies and government do currently share data to facilitate take-up where possible, there is room for improvement to ensure eligible customers are not missing out on support. We are therefore committed to continuing to cut red tape to ensure more customers are proactively identified and enrolled onto WaterSure.

In the near term, we expect companies to seek to make (or strengthen existing) datasharing agreements with relevant government departments. In the longer term, we also wish to explore how companies can achieve automatic enrolment to improve targeting and better allocate support where it is most needed.

Rationale for change

WaterSure is a statutory scheme already delivered by companies in line with regulations – and only government has the power to change these regulations.

Some companies already provide support to more consumers than is required under the WaterSure regulations by extending support to additional persons, such as to recipients of Personal Independence Payments (PiP), Attendance Allowance (AA) and Disability Living Allowance (DLA). However, this is not consistent across the industry. Furthermore, companies that provide support to additional customers under the aid of WaterSure cannot recover this cost through WaterSure cross-subsidies. Therefore, there is little incentive for other companies to follow suit, creating inequalities in support across companies.

In addition, companies have already committed in practice to no longer require a medical practitioner's note to prove eligibility for unlisted medical conditions. Instead they have agreed to accept other forms of proof for an unlisted qualifying condition, such as a repeat prescription. We want to make sure these good practices are reflected in the regulations, to provide safeguards for consumers into the future.

Given these challenges, this consultation presents 5 key reforms to WaterSure:

- 1. Extending the list of qualifying benefits to include non-means tested disability benefits for those claiming through a qualifying medical condition.
- 2. Updating the WaterSure bill cap to the amount of the average metered or unmetered bill (whichever is lower).
- 3. Capping bills for single occupiers at the average bill for a single occupier.
- 4. Removing the option for water companies to require a medical practitioner's note for health conditions not specifically listed in the WaterSure regulations.
- 5. Specifically listing more potentially qualifying medical conditions.

These proposed reforms would provide greater support for households with disabilities and those where there is child poverty, better protecting these households from the unavoidable costs of high essential water usage.

Process of this consultation

Purpose

This consultation is intended to seek comments and views on the proposed changes to WaterSure from any and all parties likely affected by these changes. We welcome responses that provide industry and consumer perspectives on the proposals. This will help Defra to effectively implement changes to WaterSure while minimising unintended effects on industry stakeholders and customers, including specific groups or demographics.

Audience

This is a public consultation, and we welcome all views, particularly those from:

- water supply and sewerage undertakers
- licensees operating primarily in England under both wholesale and retail authorisation
- · customer organisations and bodies
- industry bodies
- · regulatory bodies
- non-governmental organisations (NGOs)
- customers who have received or are in receipt of WaterSure
- any other party likely to be affected by the proposed changes

The questions are presented in a way to accommodate both a general audience and stakeholders with specialist knowledge on the regulation of service provision in the water and sewerage sector.

Duration

This consultation will run for 6 weeks. The consultation opened on 21 July 2025 and closes on 1 September 2025. Please note, any responses sent by post must arrive at the below address by the closing date of the consultation (1 September 2025) to be considered. Unfortunately, any responses received after this date will not be analysed.

Responses

Please respond to this consultation in one of the following ways:

Online using the Citizen Space consultation hub at Defra. For ease of analysis, responses via the Citizen Space platform would be preferred, if at all possible, but alternative options are provided below if required:

By email: wateraffordability@defra.gov.uk

By post:

Water Services Consumers and Affordability Policy Team Defra Ground Floor, Seacole Building

2 Marsham Street London SW1P4DF

Confidentiality and data protection information

A summary of responses to this consultation will be published on the UK government website on the consultation page: <u>Reforming the WaterSure scheme</u>. An annex to the consultation summary will list all organisations that responded and what part of the UK they represent. It will not include personal names, addresses or other contact details.

Defra may publish the content of your response to this consultation to make it available to the public without your personal name and private contact details (such as home address, email address).

If you select 'Yes' in response to the question asking if you would like anything in your response to be kept confidential, you are asked to clearly state what information you would like to be kept as confidential and explain your reasons for confidentiality. The reason for this is that information in response to this consultation may be subject to release to the public or other parties in accordance with the access to information law (these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)).

We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances. In view of this, your explanation of your reasons for requesting confidentiality for all or part of your response would help us balance these obligations for disclosure against any obligation of confidentiality. If we receive a request for the information that you have provided in your response to this consultation, we will take full account of your reasons for requesting confidentiality of your response, but we cannot guarantee that confidentiality can be maintained in all circumstances.

If you select 'No' in response to the question asking if you would like anything in your response to be kept confidential, we will be able to release the content of your response to the public, but we will not make your personal name and private contact details publicly available.

There may be occasions when Defra will share the information you provide in response to the consultation, including any personal data with external analysts. This is for the purposes of consultation response analysis and provision of a report of the summary of responses only.

Any information regarding personal health or disability status will be collected and stored securely on Defra systems alongside any other personal data for a period of up to 3 years. Questions which may require the provision of personal health or disability information are optional.

Compliance with the consultation principles

This consultation is being conducted in line with the Cabinet Office consultation principles. If you have any comments or complaints about the consultation process, please address them by email to: consultation.coordinator@defra.gov.uk

Part 1: Standard consultation questions

Question 1: Would you like your response to be confidential? [Required]				
o Yes				
o No				
Question 2: If you answered yes, which information would you like to keep confidential and why? [Required]				
Space for a written response.				
Question 3: Please provide your name. [Required]				
Space for a written response.				
Question 4: Please provide your email address. [Required]				
Space for a written response.				
Question 5: In what capacity are you completing this consultation? [Required]				
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 As a customer or individual As a representative of a water company As a non-government organisation (NGO) or other non-profit public interest group As a public representative (for example, councillor or MP) As an academic or researcher As a representative of Ofwat Other Question 6: Before this consultation were you aware of WaterSure? Yes No Unsure 				
 As a customer or individual As a representative of a water company As a non-government organisation (NGO) or other non-profit public interest group As a public representative (for example, councillor or MP) As an academic or researcher As a representative of Ofwat Other Question 6: Before this consultation were you aware of WaterSure? Yes No 				

Question 7: If you are a customer or individual, have you or someone in your household been in receipt of WaterSure support in the past year?

o Yes

0	Unsure
0	Other

o No

Space for a written response

Question 8: What is the name of the organisation or interested group you are responding on behalf of? [Required]

Space for a written response.

Part 2: Reforming the WaterSure scheme

Section 2.1: Extend the list of qualifying benefits to include non-means tested disability benefits for those claiming through a qualifying medical condition

Along with a high essential water use requirement, households must currently be in receipt of a means-tested benefit to be eligible for WaterSure. These benefits are:

- Universal Credit
- State Pension Credit
- Housing Benefit
- Income-based Jobseeker's Allowance
- Income Support
- Income-related Employment and Support Allowance
- Working Tax Credit
- Child Tax Credit awarded at a higher rate than the family element

Extending the list of qualifying benefits for those claiming through a medical condition would allow the WaterSure scheme to better support households where a disability is present, in recognition of the additional costs they face. We are proposing to add the following non-means tested disability-related benefits as additional eligibility criteria for those claiming through a qualifying medical condition:

- Personal Independence Payment (PIP)
- Disability Living Allowance (DLA)
- Child DLA
- Attendance Allowance (AA)

However, alongside the existing requirement for customers to have a high essential water use, we are keen to ensure eligibility is restricted to those in genuine need of financial support. We are therefore proposing to apply a household income threshold for those households applying for WaterSure on the basis of receiving a non-means-tested disability benefit.

We consider that a threshold of 60% of median income (an established measure of relative poverty) would ensure assistance is directed at those most in need of it. The alternative approach of setting the threshold at a fixed pound value would reduce flexibility to respond to changing economic conditions.

Furthermore, to provide a fair and accurate assessment of household income, we are proposing to include all non-means tested disability benefits in this calculation. This would allow WaterSure to continue to target households most in need of support.

We are therefore seeking views on 2 elements of the proposed income threshold. These are whether:

- the proposed 60% of median income is a fair income threshold
- non-means tested benefits should be included when calculating household income

Question 9: To what extent do you agree or disagree with the proposal that the list of qualifying benefits for WaterSure should be extended to include specified non-means tested disability benefits (for those claiming through a qualified medical condition), subject to a household income threshold?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- o Don't know

Question 10: If you want to expand on your answer, please explain your rationale here.

Space for a written response.

Question 11: Do you agree that the household income threshold for WaterSure eligibility (which would apply where households apply on the basis of receiving non-means tested disability benefits) should be set at 60% of the median income?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Question 12: If you want to expand on your answer, please explain your rationale here.

Space for a written response.		

Question 13: To what extent do you agree or disagree with the proposal to include non-means tested disability benefits when calculating household income for the purpose of the household income threshold?

- Strongly agree
- Agree
- o Neither agree nor disagree
- o Disagree
- Strongly disagree
- Don't know

Question 14: If you want to expand on your answer, please explain your rationale here.

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Section 2.2: Update the WaterSure bill cap to be the amount of the average metered bill or the average bill, whichever is lower

The WaterSure scheme currently caps eligible households' water and sewerage bills to the average bill for that water company. However, since 2021, several companies have capped bills at the average metered bill for their region. CCW recently found that if all companies capped bills at the average metered bill (rather than the average bill), this would result in eligible households receiving an average extra £26 of discount each year.

We therefore propose amending the cap amount to be either the average bill or the average metered bill, whichever offers the greatest saving. If an eligible customer's water bill falls below both the average bill and the average metered bill, they will continue to only be required to pay their calculated bill amount.

Question 15: To what extent do you agree or disagree with the proposal to cap eligible households' bills at either the average metered bill or the average bill, whichever is lower?

- Strongly agree
- o Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Question 16: If you want to expand on your answer, please explain your rationale here.

Space for a written response.

Section 2.3: Cap bills for single occupiers to the average bill for a single occupier

Single occupiers with high essential water use may receive limited or no benefit from the WaterSure scheme at present. This is because the bill cap is based on the average household and does not take household size into consideration. The average household has a higher level of water usage than a single occupier, which means that single occupiers are receiving comparably less WaterSure support than a larger household.

We are proposing to introduce a single occupier bill cap, which would be linked to the average bill (metered or unmetered, whichever is lower) for a single occupier. This would enhance fairness and provide more inclusive support to this group. If an eligible customer's water bill falls below the average bill and the average metered bill for a single occupier, they would only be required to pay their calculated bill amount.

Question 17: To what extent do you agree or disagree with the proposal that the cap for an eligible single occupier recipient should be based on the average bill or average metered bill for a single occupier, whichever is lower, rather than on the average household bill?

- o Strongly agree
- o Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Question 18: If you want to expand on your answer, please explain your rationale here.

Space for a written response.

Section 2.4: Remove the option for water companies to require a medical practitioner's note in respect of health conditions not specifically listed in the WaterSure Regulations

Several medical conditions are specifically listed in the regulations as potential eligibility criteria for the WaterSure scheme, as set out below:

- desquamation
- weeping skin disease

- o incontinence
- abdominal stomas
- Crohn's disease
- ulcerative colitis
- o renal failure requiring dialysis at home (unless a contribution to the cost of the water used by dialysis is made by the health authority)

Companies may require the customer to provide information on these medical conditions and their impact on increased water consumption, but cannot require the customer to produce a medical practitioner's note.

Households may also be eligible for support on the basis of other (not specifically listed) medical conditions that require high additional essential water use. However, for these conditions, companies can currently require the consumer to provide a medical practitioner's note as evidence.

In 2024, recognising the difficulties and associated cost in obtaining a medical practitioner's note, all water companies in England agreed not to exercise their discretion to require one. Instead, they agreed to accept a broader range of evidence, such as a repeat prescription.

We are proposing that this approach should now be formally reflected in the WaterSure Regulations.

Question 19: To what extent do you agree or disagree with the proposal to remove the option for companies to require a medical practitioner's note from claimants with conditions not specifically listed in the WaterSure Regulations?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Question 20: If you want to expand on your answer, please explain your rationale here.

Space for a written response.		

Section 2.5: Specifically listing more potentially qualifying medical conditions

Households may currently be eligible for WaterSure support based on high additional essential water use due to:

- 7 specifically listed conditions
- any other condition (not specifically listed) that necessitates high additional water use

Customers are therefore still able to apply if they have a condition which is not listed in regulations and necessitates high water use, such as dementia in certain cases.

CCW research found that customers with conditions not specifically listed in the regulations (but which can in certain cases create significant additional essential water use) may self-eliminate themselves from applying for support. For example, this could include customers with neurological conditions that can be associated with high water usage.

Adding further potentially high-water usage conditions to the regulations would encourage customers to apply for WaterSure. It would lessen the chance of customers self-eliminating themselves because their condition, or one like it, is not specifically listed. The potential conditions added will be balanced against the cost of the scheme to customers to ensure alignment with the principle of fairness for all.

Question 21: To what extent do you agree or disagree with the proposal to specifically list more potentially qualifying medical conditions, such as dementia, in the WaterSure Regulations?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Question 22: If you want to expand on your answer, please explain your rationale here.

Answers may include suggestions of additional medical conditions that should be specifically listed in the regulations.

Space for a written response.		

Section 2.6: Data-sharing

Question 23: What are your views on the barriers to existing data-sharing between water companies and government?

Space for a written response.

Question 24: What are your views on how government could increase awareness of WaterSure amongst those who are digitally excluded?

Space for a written response.

Section 2.7: Additional comments

Thank you for taking the time to complete this consultation. If there is anything else you would like to add or if you wish to provide additional evidence, please add it here.

Space for a written response.