



Department
for Environment
Food & Rural Affairs

Consultation on updating the Guaranteed Standards Scheme (GSS)

12 August 2024

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We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



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Glossary

CCW – Consumer Council for Water

Defra – Department for Environment, Food and Rural Affairs

GSS – Guaranteed Standards Scheme, common industry usage in reference to The Water Supply and Sewerage Services (Customer Service Standards) Regulations 2008.

Ofwat – Water Services Regulation Authority

Introduction

The government is consulting on changes to the Guaranteed Standards Scheme (GSS) to improve baseline customer service standards and protection in the water and sewerage sector. These proposed changes include roughly doubling payment values contained within the scheme, and broadening the set of standards which warrant payments to provide more comprehensive protection from service disruption for customers in England, following the announcements to this effect of the Secretary of State for Environment, Food and Rural Affairs on 11 July 2024.

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

The Consumer Council for Water (CCW), the statutory consumer representative body in the water sector, has conducted a review of the GSS which concluded with recommendations for improvements. Government has carefully considered these recommendations and incorporated them into these proposals as appropriate.

The proposals below lay out updates across 3 key areas in relation to the scheme:

- Uprating payment amounts
- Improving and clarifying existing standards within the scheme
- Introducing additional standards which do not at present form part of the statutory provisions of the scheme

They also propose potential changes to the procedures for updating the GSS to future-proof the level of protection it offers to customers and ensure that standards can be adjusted with flexibility to future circumstances.

Part 2.1 will set out the proposed uprating of payment values associated with the GSS from the levels last set in 2000. The proposed updates and clarifications to the existing standards will be detailed in Part 2.2. Part 2.3 will put forward proposals for potential new

standards to be added to the existing scheme. Finally, proposed procedural changes to the way GSS is administered and updated in future can be found in Part 2.4.

Background

The Water Supply and Sewerage Services (Customer Service Standards) Regulations 2008 are commonly referred to in the water and sewerage sector as the GSS.

The GSS sets a baseline level of service below which companies must not fall by setting out certain standards and mandating payments to be made to affected customers for contravening these standards. Originally introduced in 1989, it was intended to provide protection for customers in the privatised water and sewerage market, and to mitigate the risk of natural monopoly service providers lacking incentives to prioritise customer service and experience.

Several amendments since the original legislation was introduced have added additional standards, clarified existing standards, and updated payment values. However, the values of payments have not been altered since 2000, and the standards included in the scheme have not been altered since 2008.

The statutory standards set out in the legislation require payments for:

- Failure to provide a notification of a planned appointment and a time window for the appointment (morning or afternoon, or a 2-hour window if requested)
- Failure to keep planned appointments, or cancelling an appointment with less than 24 hours' notice
- Failure to respond to written account queries about the correctness of bills within 10 days
- Failure to respond to written requests to change payment methods within 5 days
- Failure to respond to written complaints within 10 days
- Failure to provide 48 hours' notice of planned supply interruption of more than 4 hours including notice of when supply will be restored
- Failure to restore supply by time stated in notice, or within an initial period of 12 or 48 hours (dependant on the nature of the supply interruption)
- Failure to restore supply for each further period of 24 hours
- Two incidents of low water pressure supply (below 0.7 bar) in a 28-day period
- Sewer flooding internally to a customer property from a sewerage company asset
- Sewer flooding externally to a customer property from a sewerage company asset

Summary of current statutory payment values and standards

The GSS mandates payments for the circumstances above, differing between household and non-household (business) customers. These payments range from £10 to £50 for

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each standard breach and were last updated in 2000. A summary of the statutory payment values in the scheme is set out below in Table 1, including additional penalties where payments are not made within given time limits of 10 or 20 days.

Table 1: Summary of current GSS payment values and standards

GSS regulation	GSS payment: Household	GSS payment: Other	Late payment penalty: Household	Late payment penalty: Other
Failure to provide notice of planned supply interruption	£20	£50	£20	£50
Supply not restored - initial period	£20	£50	£20	£50
Supply not restored - each further 24-hour period	£10	£25	£20	£50
Repeated failure to provide sufficient water pressure	£25 for two incidents in a 28-day period (one payment per year)	£25 for two incidents in a 28-day period (one payment per year)	No payment	No payment
Flooding from sewers - internal flooding	Payment equal to customer's annual sewerage charges (min. £150, max. £1,000)	Payment equal to customer's annual sewerage charges (min. £150, max. £1,000)	£20	£50
Flooding from sewers - external flooding	Payment equal to 50% of customer's annual sewerage charges (min. £75, max. £500)	Payment equal to 50% of customer's annual sewerage charges (min. £75, max. £500)	£20	£50
Failure to provide notification of appointments	£20	£20	£10	£10

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Failure to keep appointments	£20	£20	£10	£10
Failure to respond to account/billing queries	£20	£20	£10	£10
Failure to respond to requests for changes to payment arrangements	£20	£20	£10	£10
Failure to respond to written complaints	£20	£20	£10	£10

Rationale for change

Enhanced company schemes

All water and sewerage companies offer tailored versions of the GSS, enhanced to varying degrees, including combinations of voluntarily uprated payment values, more stringent standard requirements, or additional non-statutory standards covering incidents such as boil notices. The statutory GSS standards are generally packaged into these voluntary customer offers, and so there can be significant variation in the customer protection measures between companies or regions. This lack of consistency, and regular need for companies to go beyond existing payment rates, demonstrates industry recognition the statutory GSS needs improvement.

Recent service disruption incidents

Recent incidents have also highlighted the need to update both payment values and the standards themselves.

Hastings incident: May 2024

From 2 to 8 May, over the bank holiday weekend, over 30,000 properties in the Hastings area experienced an interruption to their supply of water lasting several days, caused by a burst water main. This prompted Southern Water to provide a fund worth £1m targeting compensation for businesses, festivals and events, and community projects, providing for payments to businesses worth significantly more than the statutory amounts.

However, payments were not made to households under the GSS, due to the nature of the burst to a strategic water main which only requires a restoration of supply within 48 hours, and the restorative action taken which Southern Water argued restored supply-in-kind within this limit. This incident highlighted the need for clarification of the statutory standards and uprating of the values of payments to provide the level of protection which customers expect.

Brixham, Devon incident: May 2024

In Brixham, South West Water issued a boil notice to customers on 15 May 2024 after the parasite cryptosporidium was discovered in the water supply system. Whilst the initial boil notice covering over 15,000 households was partially lifted within a week, for around 2,500 households the notice remained in place for around 8 weeks until the 8 July. The statutory GSS standards do not include incidents requiring the issuance of a boil notice. As such, while South West Water's decision to significantly uprate their voluntary payments to customers by more than £100 was welcome, it did highlight a gap in the statutory scheme and show how the addition of standards to more effectively provide a guarantee of customer protection from such incidents would provide greater certainty to consumers.

Voluntary implementation of Ofwat's 2018 recommendations

In response to a major freeze-thaw event caused by the 'Beast from the East', which led to widescale supply interruptions and disruptions across much of England and Wales, Ofwat reviewed the GSS scheme. This included a [consultation with industry stakeholders \(ofwat.gov.uk\)](https://www.ofwat.gov.uk/consultation/industry-stakeholders) and [further research into the wider "Beast from the East" disruptions \(ofwat.gov.uk\)](https://www.ofwat.gov.uk/research/wider-beast-from-the-east-disruptions). In 2018, Ofwat subsequently published [recommendations for changes to the GSS \(ofwat.gov.uk\)](https://www.ofwat.gov.uk/recommendations-for-changes-to-the-gss) to better provide the level of protection which customers expect.

In short, Ofwat recommended that the government amend the GSS regulations to:

- Increase compensation payments for supply interruptions
- Reduce the time between additional compensation payments for longer supply interruptions from 24 to 12 hours
- Remove the provision that delays payments to customers if supply interruptions are caused by a burst or leak to a 'strategic main' (allowing 48 rather than 12 hours to restore supply), meaning all supply interruptions must be restored within 12 hours
- Make all GSS payments automatic
- Review GSS payment amounts when cumulative inflation exceeds 10%

Since these recommendations were made specifically in response to the freeze-thaw event in 2018, they only targeted the supply interruption standards. Defra and the Welsh Government accepted the recommendations but did not formally implement them, due to plans for a more comprehensive update to the GSS beyond supply interruptions which did not come to fruition.

Most companies voluntarily implemented Ofwat's recommendations following this review, and so they were widely adopted as industry best practice but without any amendment to the statutory requirements. This voluntary adoption of Ofwat's recommended enhancements to the GSS is indicative of the level of agreement across industry stakeholders that updates to the GSS are overdue. Whilst further consideration is needed to clarify the details of any updates, widespread voluntary adoption indicates that Ofwat's general approach and rationale for updating the GSS had support from industry stakeholders.

Process of this consultation

Purpose

This consultation is intended to seek comments and views on the proposed changes to the GSS from any and all parties likely affected by these changes. We welcome responses which provide industry and consumer perspectives on the proposals, in order to inform the implementation of changes to the GSS in the most effective manner, whilst minimising any 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 and 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 experienced service disruptions or received GSS payments in the past, and 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 8 weeks. The consultation opened on 12 August 2024 and closes on 7 October 2024. Please note, any responses sent by post must arrive at the below address by the closing date of the consultation 7 October 2024 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:

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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
SW1P 4DF

Confidentiality and data protection information

A summary of responses to this consultation will be published on the UK government website on the [Defra homepage](#). An annex to the consultation summary will list all organisations that responded and what part of the UK they represent but 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 state clearly 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

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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

Summary of proposed changes to the GSS

CCW has conducted a comprehensive review of the GSS since 2023, leading to the provision of recommendations to Defra and the Welsh Government for updates based on their findings from customer research, a stakeholder call for evidence, and their industry working groups. Building on Ofwat's 2018 recommendations, which have acquired widespread industry approval and voluntary adoption, these new recommendations would update the standards in 3 key areas: updates to existing standards, introduction of new standards, and uprating of payment values. Additional procedural proposals are also included to ensure the futureproofing of the scheme from inflation in future.

The government has accepted these recommendations and has adapted them into the proposals below, including some minor additions or clarifications based on initial pre-consultation research, engagement sessions and feedback. The pre-consultation testing of the proposals took the form of engagement sessions, written feedback, and informal discussions with representatives of water and sewerage companies and retailers, consumer representative bodies, Ofwat, CCW and Water UK.

Part 1: Standard consultation questions

1. What is your name?

2. What is your email address?

3. Would you like your response to be confidential?

- Yes
- No

If you selected "Yes", please give your reason, and explain which information should be kept confidential.

4. Are you responding to this consultation as:

- A customer or individual, or
- A representative of an organisation or company?

If representing organisation or company

1. What is the name of your organisation or company?

2. Which of these options best describes your organisation or company?

- Water company or retailer
- Consumer group
- Regulatory body
- Activist or advocacy group
- Other (please explain)

If you selected "Other", please explain.

3. What size is your organisation or company?

- Micro-entity (under 10 employees FTE)
- Small (10 to 49 employees FTE)
- Medium (50 to 250 employees FTE)
- Large (over 250 employees FTE)

If customer or individual

1. Which of these options best describes you or your household's relation to the water and sewerage industry?
 - I (or we) pay for water and sewerage for primarily domestic purposes
 - I (or we) pay for water and sewerage for primarily business purposes
 - I (or we) pay for both
 - Unsure
 - I have a different arrangement (please explain)

If you selected "I have another arrangement", please explain.

If business customer

1. If you pay for water and sewerage for business purposes, what is the size of your company?
 - Micro-entity (under 10 employees FTE)
 - Small (10 to 49 employees FTE)
 - Medium (50 to 250 employees FTE)
 - Large (over 250 employees FTE)

If customer or individual

1. Before this consultation, were you aware of the Guaranteed Standards Scheme?
 - Yes
 - No
 - Unsure
2. Have you, your household or your business been eligible for a payment under the Guaranteed Standards Scheme in the past year?
 - Yes, my household
 - Yes, my business
 - Yes, both
 - No
 - Unsure
 - Other (please explain)

If you selected "Other", please explain.

3. Have you, your household or your business received a payment under the Guaranteed Standards Scheme in the past year?

- Yes, my household
- Yes, my business
- Yes, both
- No
- Unsure
- Other (please explain)

If you selected “Other”, please explain.

Part 2: GSS policy proposals and consultation questions

This section of the consultation covers the policy proposals to update the Guaranteed Standards Scheme (GSS) with the relevant consultation questions following each policy proposal.

Part 2.1: Proposed updates to payment levels

Payment values would be updated by adjusting for inflation since they were last updated in 2000, which would roughly double all payment values in line with the Secretary of State’s announcement. For example, a £10 payment in 2001 would be worth between £18 (Consumer Price Index, CPI) and £22 (Retail Price Index, RPI) in 2024. Based on an average annual water and sewerage bill of £440, this would mean the minimum payment of at least £40 under all proposals would now represent around 10% of the average annual customer bill, with several higher payments worth at least a quarter.

In addition to their customer research, call for evidence and industry working groups, CCW considered payment amounts for similar service failures in comparable sectors, including

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Scottish Water and other UK utilities, which informed their decision to recommend uprated payment values as summarised below.

CCW's customer research found that certain standards were perceived as particularly important to customers, with heightened degrees of perceived disruption experienced when they are breached. As a result, CCW concluded that payments for failing to keep appointments, failing to provide notice of a planned supply interruption, and failing to restore supply should be increased above the rate of inflation.

In pre-consultation testing, some industry stakeholders expressed concern that uprating all payments based on pre-existing values, whilst useful in accounting for inflation, risks preserving unhelpful disparities between payment value and significance of disruption for some standards. This is indicative of a wider concern expressed by stakeholders that the original payment values are not necessarily distributed fairly between standards. For the purposes of this consultation, we are proposing uprating payment values in line with inflation for most standards (an approach which has received widespread industry approval), and above inflation where CCW have identified particular disruption to customers. However, we welcome responses on the proposed payment values in general, particularly if there is a risk that they unreasonably prioritise payments for some standards over others.

This section includes a breakdown of the standards by:

- Customer service standards (covering appointments, account queries, payment requests, complaints)
- Supply disruption standards (covering supply interruptions and low pressure)
- Sewer flooding standards (covering internal and external sewer flooding)

A summary of the proposed payment levels is included in tables for each section.

2.1a: Customer service standards

Payments for customer service standards are the same for household and non-household customers, with a payment of £20.

CCW found that failures to properly arrange appointments or to respond to account queries, payment requests and complaints are generally not considered highly disruptive. Corresponding payments to customers for breaches of related standards from Scottish Water are £30, and the highest discretionary customer offer in the English water sector is £35 for responding to account queries or payment requests and £50 for responding to complaints and making appointments.

However, the research also found that failure to keep and attend appointments is perceived as significantly more disruptive for customers, and so concluded that breaches of this standard warrant a higher payment.

The proposal is to uprate payment values for all customers as follows:

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- Failure to properly arrange appointments: statutory £20, proposed £40
- Failure to keep appointments: statutory £20, proposed £50
- Failure to respond to account queries on time: statutory £20, proposed £40
- Failure to respond to payment arrangement requests: statutory £20, proposed £40
- Failure to respond to written complaints: statutory £20, proposed £40

Table 2: Summary of proposed customer service standard updates

Existing standard	Current GSS payment	Recommended GSS payment
Appointments not made properly	£20	£40
Appointments not kept	£20	£50
Account queries not actioned on time	£20	£40
Requests to change payment arrangements not actioned on time	£20	£40
Complaints not actioned on time	£20	£40

Consultation questions on updating customer service standard payments

1. Overall, do you support the policy to update payment values for customer service standard failures, setting aside the specific payment values?
 - Yes
 - No (Please explain)
 - Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.

2. Do you support the proposed specific payment values for each Customer Service Standard?
 - Yes
 - No (Please explain)
 - Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.



2.1b: Supply interruption standards

Payments for interruption to supply were considered particularly disruptive by all customers, and the current statutory payment level was significantly below expectations, which CCW identified as warranting an increase above the rate of inflation. However, CCW's initial suggestion of £75 for failure to notify customers of an interruption or to initially restore supply on time was met with concern from industry that it was excessive.

The payment for further subsequent periods where supply is not restored was also considered too low, even following the widespread voluntary implementation of Ofwat's 2018 recommendation which uprated this payment to £30. As such, CCW recommended uprating this payment to the same degree as the initial period, since again £75 was considered excessive. Further detail will be considered in Part 2.2, but Ofwat's 2018 recommendation to reduce the duration of the period which triggers a further payment also received general support and has been widely implemented already.

Payments in comparable sectors range from £30 to £75 for the initial period of supply interruption and are £30 to £35 for further periods of interruption. The highest discretionary payment offered within the sector is £35. As a result, CCW concluded that the payment should be uprated beyond inflation, but not so far as to present an unreasonable cost to companies.

The proposal to uprate payment values for household customers is as follows:

- Failure to provide notice of planned supply interruption: statutory £20, proposed £50
- Failure to restore supply (initial period): statutory £20, Ofwat £30, proposed £50
- Failure to restore supply (further period): statutory £10 per 24 hours, Ofwat £30 per 12 hours, proposed £50 per 12 hours

Corresponding proposals for non-household customers are as follows:

- Failure to provide notice of planned supply interruption: statutory £50, proposed £100
- Failure to restore supply (initial period): statutory £50, Ofwat £75, proposed £100
- Failure to restore supply (further period): statutory £25 per 24 hours, Ofwat £75 per 12 hours, proposed £100 per 12 hours

Table 3: Summary of proposed supply interruption standard updates

Existing standard	Current GSS payment: Households	Current GSS payment: Other	Recommended GSS payment: Households	Recommended GSS payment: Other
Incorrect notice of planned supply interruption	£20	£50	£50	£100
Supply not restored on time	£20, and £10 for each subsequent 24 hours	£50, and £25 for each subsequent 24 hours	£50, and £50 for each subsequent 12 hours	£100, and £100 for each subsequent 12 hours

Consultation questions on updating supply interruption standards

- Overall, do you support the policy to update payment values for failing to meet supply disruption standards, setting aside the specific payment values?
 - Yes
 - No (Please explain)
 - Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.

- Do you support the proposed specific payment values for each supply disruption standard for household customers?
 - Yes
 - No (Please explain)
 - Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.

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3. Do you support the proposed specific payment values for each supply disruption standard for non-household customers?

- Yes
- No (Please explain)
- Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.

2.1c: Incidents of low pressure

Incidents of low pressure were not considered highly disruptive in isolation according to CCW’s research. The highest level of discretionary payment offered in the sector is £50. However, there was concern that multiple repeated occurrences of low pressure within a year would not warrant additional payments despite significantly greater disruption, given the limit of one payment a year in the statutory GSS. Customers felt that this made the standard appear tokenistic. Therefore, the proposal includes the removal of this limit, replaced with a limit of 5 payments a year.

The highest level of discretionary payment offered in the sector is £50.

The proposal is to uprate payment values for all customers as follows:

- Incidence of low-pressure: statutory £25 for 2 occurrences in a 28-day period (max one payment per year), proposed £50 for 2 occurrences in a 28-day period (max 5 payments per year)
- Customer identified on the DG2 register (at risk of low pressure): proposed £250 per year

Table 4: Summary of proposed low pressure standard update

Existing standard	Current GSS payment	Recommended GSS payment
Low pressure	£25 (once per year)	£50, up to five payments per year – equivalent to just over the average water bill. Automatic £250pa for customers with ongoing low pressure.

Consultation questions on updating the low-pressure standard

1. Overall, do you support the proposed policy to update the statutory payment values in incidents of low pressure, setting aside the specific payment values?

- Yes
- No (Please explain)
- Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.

2. Do you support the proposed specific payment values for incidents of low pressure or in the event a customer receives a consistent supply of water with inadequate pressure?

- Yes
- No (Please explain)
- Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.

3. Do you agree with the proposal to lift the cap on the number of times a customer can claim due to low pressure from one incident to five incidents over a year?

- Yes
- No (Please explain)
- Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.



2.1d: Sewer flooding standards

In CCW’s research, incidents of sewer flooding, whilst considered highly disruptive by customers, often resulted in the mistaken conflation of GSS payments with compensation for damages, leading to disputes with companies. The current statutory provisions allow for a payment set against a percentage of the annual average sewerage bill of the affected customer, with a given minimum and maximum payment level, but these payments are not compensatory for damages.

The minimum payment levels for these standards are already significantly greater than other standards. It is important to maintain the distinction between the GSS and any additional compensation which companies may make available to customers affected by poor service. As a result, CCW felt it sufficient to simply uprate the minimum and maximum payment values for this standard in line with inflation.

The proposal for uprating these payment values for all customers is as follows:

- Internal sewer flooding: payment equal to annual sewerage charges, original min £150 and max £1,000, proposed min £300 and max £2,000
- External sewer flooding: payment equal to 50% of annual sewerage charges, original min £75 and max £500, proposed min £150 and max £1,000

This brings the minimum payment for incidents of internal sewer flooding to higher than the average sewerage bill in 2024 to 2025, which is £249.

Table 4: Summary of proposed sewer flooding standard updates

Existing standard	Current GSS payment	Recommended GSS payment
Internal flooding from sewers	Payment equal to annual sewerage charges (min payment of £150, max of £1,000)	Payment equal to annual sewerage charges (min payment of £300, max of £2,000)
External flooding from sewers	Payment equal to 50% of annual sewerage charges (min payment of £75, max of £500)	Payment equal to 50% of annual sewerage charges (min payment of £150, max of £1,000)

Consultation questions on updating the sewer flooding standards:

1. Overall, do you support updating the payment values in the event of Sewer Flooding, setting aside the specific payment values?

- Yes
- No (Please explain)
- Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.

2. Do you support the proposed specific minimum and maximum payment values in the event of internal and external sewer flooding?

- Yes
- No (Please explain)
- Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.

2.1e: Proposed penalty payments

There are certain penalty payments mandated in the GSS to be made when a company fails to make a payment for a GSS breach within a given time limit. These penalty payments vary between the customer service, supply interruption, low pressure, and sewer flooding standards. In CCW’s research, penalty payments were considered important by customers to ensure that service providers maintained the implementation of the GSS effectively, and working groups expressed that £10 penalties were perceived as trivial. Since penalty payments vary depending on the standard, CCW propose that a simplification of this aspect of the GSS would be beneficial. Therefore, we propose that penalty payments all be uprated to the higher level of penalty within the GSS, adjusted for inflation.

For customer service standards, penalty payments are the same across all customers, worth £10, whilst equivalent payments in the gas sector are £20 or £30. For supply interruption and sewer flooding standards the penalty payments vary between household and non-household customers, currently set at £20 and £50 respectively.

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The proposed updated penalty payments for each of the following standards are:

- For all customer service standards penalty payments: statutory £10, proposed £40
- For supply interruption standards: household customers – statutory £20, proposed £40, non-household customers – statutory £50, proposed £100
- For sewer flooding standards: household customers – statutory £20, proposed £40, non-household customers – statutory £50, proposed £100

Table 5: Summary of proposed penalty payment updates

Category of penalty payment standard	Current GSS payment: Households	Current GSS payment: Other	Recommended GSS payment: Households	Recommended GSS payment: Other
Customer service standards	£10	£10	£40	£40
Supply interruption standards	£20	£50	£40	£100
Sewer flooding standards	£20	£50	£40	£100

Consultation questions on penalty payments

1. Overall, do you support updating the payment values in the event a company fails to pay a GSS payment within a given time frame, setting aside the specific payment values?
 - Yes
 - No (Please explain)
 - Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.

2. Do you support the proposed specific payment values in the event a company fails to pay a GSS payment within a given time frame?
 - Yes
 - No (Please explain)
 - Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.

2.1f: Payment values further comments

3. Do you have anything further to comment on the updating of the current statutory minimum payment policies as outlined in this Part 2.1?

Please limit your response to 500 characters or less.

Part 2.2: Proposed updates to existing standards

Government proposes the below changes to the existing statutory standards following from the findings of CCW's review and pre-consultation engagement with stakeholders.

2.2a: Broadening internal flooding from sewers

CCW's customer research identified that the disruption caused to customers by sewer flooding is perceived as equally severe when it affects the internal property as when it affects an external building to the property which is 'lived-in' or used for domestic purposes. Companies also suggested that they generally encourage their front-line customer service teams to be proactive in taking action to make sewer flooding payments available in a discretionary manner based on the context of an incident. This view was echoed in our pre-consultation testing. Some members of CCW's working group did raise concerns that an overly prescriptive approach may limit the freedom of companies to adapt to the situation at hand, and so may prevent customers from receiving the support they deserve. There were also some concerns raised that Ofwat's definition of internal sewer flooding differed slightly from the GSS by including, for example, garage flooding as internal. However, CCW's research concluded that the majority of companies are satisfied that the two definitions are separate entities, so concerns around consistency were not significant.

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Therefore, we propose an update to the existing standard to reflect that:

Outbuildings used for domestic activities, such as gyms or offices, are considered 'internal' for the purposes of damage caused by flooding.

Consultation questions on external flooding from sewers

1. Do you support the proposal to define outbuildings used for domestic activities as 'internal' for the purposes of the GSS?
 - Yes
 - No (Please explain)
 - Unsure

If you selected "No", please explain. Please limit your response to 500 characters or less.

2.2b: Weather exemptions

Weather exemptions apply in the case of 'severe' weather preventing the keeping of planned appointments, attending visits in response to a complaint, and the restoration of supply after an interruption. 'Exceptional' weather exemptions (more extreme than severe) apply where weather events affecting large areas or causing extensive flooding cause sewer flooding, which companies are therefore not obligated to make a GSS payment for.

CCW considered the removal of these weather exemptions and found in their customer research that generally the exemptions were unclear and poorly communicated, and that they reduced the legitimacy of the standards themselves. There was acknowledgement that where sewer flooding risks had not been identified meaning there was no chance for preparation, companies should not be expected to make a payment in exceptional weather events. However, customers felt that in areas with established higher risk levels, companies should take steps to prevent sewer flooding with mitigation measures, and so events of sewer flooding should require a GSS payment in such circumstances. Overall, the research indicated a desire for clarity and consistency in the application of exemptions, and the definition of legitimate weather exemptions.

Also, CCW's call for evidence and industry working group established similar themes, that there was a need for clarity and fairness in the definition and application of exemptions, particularly in the changing weather conditions resulting from climate change. Many companies agreed they often did not apply the weather exemptions to customers at risk of repeat sewer flooding, and it could appear to be used as an excuse if not applied fairly.

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Finally, whilst there is a need for a backstop to prevent liability for GSS payments in circumstances beyond the companies' control, it was suggested the distinction between severe and exceptional weather was difficult to enforce, so the removal of exceptional weather altogether would be reasonable.

Government pre-consultation engagement produced similar results, with agreement there is a need for improvement and clarity of the exemptions, and indication many companies already voluntarily disapply the exemptions where reasonable.

Therefore, we propose:

- The removal of the exceptional weather exemption from the sewer flooding standard
- The removal of the severe weather exemption from the supply restoration standard
- The retention of the severe weather exemption for appointment attendance in the interest of the safety of company staff
- The addition of a 'force majeure' clause to replace the exceptional weather exemption, to prevent company liability in events which a company could not have reasonably mitigated for

Consultation questions on the 'exceptional weather' exemption

1. Do you support the proposal to remove the exceptional weather exemption from the sewer flooding standards?
 - Yes
 - No (Please explain)
 - Unsure

If you selected "No", please explain. Please limit your response to 500 characters or less.

2. Do you support the proposal to remove the severe weather exemption from the supply restoration standards?
 - Yes
 - No (Please explain)
 - Unsure

If you selected "No", please explain. Please limit your response to 500 characters or less.

3. Do you support the proposal to retain the exceptional weather exemption for supply restoration, appointments and visit attendance where to complete the activity would risk the safety of water company staff?

- Yes
- No (Please explain)
- Unsure

If you selected "No", please explain. Please limit your response to 500 characters or less.

4. Do you support the proposal to introduce a replacement 'force majeure' clause in the case of sewer flooding?

- Yes
- No (Please explain)
- Unsure

If you selected "No", please explain. Please limit your response to 500 characters or less.

2.2c: Methods of communication

CCW's research found the requirement for communications regarding complaints, account queries, and payment requests to be in written form, regardless of customer preference or needs was unreasonable and inconsistent with other standards and with company practice. Their customer research concluded it was unclear what was included within the definition of written communication (meaning email, online or just letters), and the needs of

customers and modern methods of communication should be considered within the standard.

The industry call for evidence and working groups indicated general agreement that inclusion of modern communications channels would reflect company practice and provide the best outcomes for customers. Government industry engagement echoed this point. Both CCW and government received some feedback that there were concerns around the cost and practicality of applying the standards to all methods of communication, especially as non-written contact generally had higher response rates, so the impact would be less significant. However, this concern was not widely held, and there was general agreement that an expansion of the communication methods would be a practical and reasonable way of improving customer service.

Therefore, we propose:

Aligning communication methods across all standards within the regulations by including both oral and written forms of communication for the complaints, account queries, and payment arrangement standards to allow customers to contact companies in their preferred format.

Consultation questions on aligning methods of communication

1. Do you support this proposal to align communication methods across all standards?
 - Yes
 - No (Please explain)
 - Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.

2.2d: Appointments

CCW considered the appointment standards did not sufficiently define what forms of appointment were included, or how the standard applies in emergencies. Their research established that customers generally appreciated the standards, but felt they needed clarification for their practical application. Companies generally felt the current standard included reasonable time slots on request, but agreed some clarification could be beneficial, especially regarding emergency appointments. No significant concerns were raised in our pre-consultation testing.

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Therefore, we propose:

A review and update of Ofwat's guidance on the organisation and definition of appointment time slots to provide clarity in areas of ambiguity, particularly in allowing for emergency appointments and allowing flexibility for companies to offer more specific timeslots for appointments where possible.

Consultation questions on appointment definitions

1. Do you support the proposal for a review and update of Ofwat's guidance to provide clarity on organisation and definition of appointment timeslots?

- Yes
- No (Please explain)
- Unsure

If you selected "No", please explain. Please limit your response to 500 characters or less.

2.2e: Low pressure

The low pressure standard applies in cases where the water pressure in the communication pipe to the customer's property falls below 0.7 bar. CCW received customer feedback in their research indicating this standard was extremely difficult to understand and apply to their experiences, and a lack of clarity on whose responsibility it is to measure and monitor the pressure they received. There was a general feeling companies needed to be more proactive in providing guidance on how this standard is monitored and enforced, and how customers could reasonably measure their pressure. As previously covered, customers also felt that the exemption from further payments after one payment in a year felt unfair and tokenistic.

In the call for evidence and working groups, CCW found most companies agreed that the standard required clarification in its interpretation and intention for better outcomes for customers. There was some disagreement on the practicality of the standard, but companies agreed in principle that better explanations of required pressures and property boundaries would be beneficial for customers, and clarified definitions of the impacts of essential or planned works or supply incidents on the implementation of the standard would be helpful for companies.

Therefore, we propose:

Ofwat introduce new guidance on how companies communicate this standard to customers, and how it should be implemented to ensure the best outcomes for customers.

Consultation questions on updating low pressure standard

1. Do you support this proposal for Ofwat to introduce new guidance on communicating the low-pressure standard to customers?

- Yes
- No (Please explain)
- Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.

Part 2.3: Proposed new standards

In addition to the above clarifications to the existing standards, we propose introducing the following new standards alongside publication of guidance by Ofwat to clarify the process for their application by companies.

Table 6: Summary of proposed new standards and payment levels

Proposed new standard	Recommended GSS payment: Household	Recommended GSS payment: Other
PSR standard – Not receiving promised help	£50	Not applicable
Incorrect summons	£40	£40
Incorrect judgement	£100	£100
Incorrect CRA default	£100	£100
Failure to apply an actual meter reading within 24 months	£40 (£80 for each subsequent 24 month period)	£40 (£80 for each subsequent 24 month period)
Failure to install optional meter on time	All charges waived from 8 weeks until meter fitted	All charges waived from 8 weeks until meter fitted
Water quality, ‘boil water’ and ‘do not drink’ notices	£10 per day triggered at the third day of being issued a notice, up to a maximum of the customer’s annual clean water charges	£20 per day triggered at the third day of being issued a notice, up to a maximum of the customer’s annual clean water charges. The ability to make an additional claim where further

		inconvenience or business impact is experienced.
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2.3a: Incorrect debt action standards

Some companies have voluntarily included an additional standard in their customer offers which provide payments to customers affected by incorrect debt action. In particular, incidents of incorrect summons to court, incorrect references to a credit reference agency (CRA) for default, and incorrect summons resulting in a judgement are considered to be highly impactful incidents for customers. CCW established they receive a significant number of complaints related to debt recovery action by companies, so argue that it would be beneficial to include this standard in the statutory GSS to protect customers.

The industry call for evidence and working groups indicated general agreement with CCW's suggestion, and acknowledgement that where incorrect action by a company affects a customer's financial situation and credit rating, remedial action is important. Some concerns were raised that identification of incorrect debt action is difficult, since often action is taken on the basis of information provided by customers, so where incorrect information is provided, companies should not be held responsible for the results.

Pre-consultation engagement sessions resulted in some feedback that clarity is needed, in particular regarding how payments for such a standard should be made (by credit to account, BACS transfer, or other) and relating to the wording of the standard. It was emphasized that where a court judgement is made, it is not the company's responsibility, but that the company should be held responsible where a court summons is wrongly issued. Overall, there was agreement the inclusion of this standard would be beneficial for customers and would not have an undue impact on companies since incorrect debt action is relatively uncommon.

Therefore, we propose the introduction of a new incorrect debt action standard alongside relevant guidance, which requires payments as follows:

- For wrongly issued court summons, a payment of £40
- For wrongly issued court summons that result in a judgment against the customer, a payment of £100
- For incorrect payment defaults registered with a CRA, a payment of £100

Consultation questions on incorrect debt action standards

1. Do you agree with the introduction of new debt action standards?
 - Yes
 - No (Please explain)
 - Unsure

If you selected "No", please explain. Please limit your response to 500 characters or less.

2. Do you think that the payment rates for both household and non-household customers are suitable?
- Yes
 - No (Please explain)
 - Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.

2.3b: Meter reading and installation standards

CCW also received indication in their customer research that there were concerns around the proper installation and reading of meters by companies. Industry responses in CCW’s call for evidence and working groups indicated agreement with the general standard. Concerns were raised around implementation, particularly regarding alignment with billing cycles, caveats for blocked access to meters, reasonable timescales for meter installation, and the best forms of compensation. There was also a concern that the standard should include allowances for smart meters to be installed, which was echoed in pre-consultation testing. However, CCW concluded that a reasonable standard, with considered guidance to ensure proper implementation, would be beneficial for customers to ensure that they receive accurate and timely bills and that meters are installed within a reasonable time after a customer has requested one.

Therefore, we propose the introduction of a new meter installation and reading standard alongside relevant guidance, requiring payments as follows:

- For failure to attempt to take a meter reading at least once in a 24 month period, a payment of £40 with an additional payment of £80 for each additional 24 month period

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- For failure to install a meter within 8 weeks of a customer request for one, waive of all charges after the period of 8 weeks until such time as the meter is installed as requested

Owat guidance states that companies should take a meter reading at least once every two years, however most companies go further and take a meter reading twice a year. For consistency, we have aligned our proposed meter reading standard with the Owat minimum.

Consultation questions on meter reading and installation standards

1. Do you agree with the introduction of new meter reading and installation standards?
 - Yes
 - No (Please explain)
 - Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.

2. Do you think that the proposed payment rates are suitable?
 - Yes
 - No (Please explain)
 - Unsure

If you selected “No”, please explain. Please limit your response to 500 characters or less.

2.3c: Priority Service Register (PSR) standard

CCW’s customer research indicated concern that standards be equitable and cater to all customers’ needs. Therefore, they considered a new PSR service provision standard to ensure that vulnerable customers receive the help that they are promised from water

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companies, especially in incidents of service disruption, such as water bottle deliveries. It was generally considered this would be best applied on a case-by-case basis. CCW's call for evidence received near universal agreement with the principle of the standard, and some companies indicated they already offer a similar standard voluntarily.

However, in the working group discussion, some concerns were raised that if the standard is overly prescriptive, it may introduce unreasonable burden on water companies and be very hard to enforce, and specific requirements such as providing bottled water in supply interruptions may risk prioritising the wrong things in such an incident. Similar concerns were echoed in pre-consultation testing, with difficulties around overly rigid or standardised PSR offerings. In addition, a concern around the impact on regions with relatively higher proportions of PSR customers was raised, since this could introduce a significant cost to companies.

Therefore, alongside comprehensive guidance based on Ofwat's PSR work and industry feedback, we propose the introduction of a new PSR service provision standard requiring payments as follows:

For failure to provide a promised service or support to a customer registered on the PSR, a payment of £50.

Consultation questions on Priority Service Register service provision standard

1. Do you agree with the introduction of the new Priority Service Standard?

- Yes
- No (Please explain)
- Unsure

If you selected "No", please explain. Please limit your response to 500 characters or less.

2. Do you think that the proposed payment rate of £50 is sufficient to support vulnerable customers where a promised service has not been delivered?

- Yes
- No (Please explain)
- Unsure

If you selected "No", please explain. Please limit your response to 500 characters or less.

2.3d: Water quality ‘boil notice’ and ‘do not drink’ standards

Finally, to recognise the inconvenience water quality incidents such as ‘boil’ and ‘do not drink’ notices can cause for customers, CCW considered a new standard to provide payment to customers affected by such incidents. Their customer research found agreement that such a standard should be included in the GSS, both to provide reassurance and trust in companies’ ability to provide clean water and to recognise the disruption such incidents cause. There was disagreement over the payment values and period of time before payment is triggered, since whilst an incident may not cause much disruption, some customers felt that longer incidents warranted significant payment.

In CCW’s call for evidence and working groups, concerns were raised that such a standard may introduce perverse incentives concerning public health incidents. Additional concerns were raised around ensuring responsibility for such an incident is properly identified, and that payment amounts should be flexible to allow companies to best account for disruption to customers. Furthermore, clarity is needed on how a customer is made aware of such a notice and how a notice is withdrawn, as physical delivery to a property would require different timescales to the publishing of such a notice online or in a news bulletin, and the ending of a notice period is largely out of companies’ hands. Companies suggested the cap for payments would perhaps be better enforced as a set amount, or at the average bill value for the area, to avoid unfairly punishing low water consumers. Also, there was uncertainty around the timing of payments after a period of three days, and some suggestion that payments after one day, or even 12 hours, may be more effective. However, many companies already offer a voluntary standard in a similar form to CCW’s suggestions, and the general standard received agreement in principle during CCW’s research and government pre-consultation testing.

Therefore, we propose the introduction of a drinking water quality standard, alongside relevant guidance, requiring payments as follows:

For issuance of a ‘boil’ or ‘do not drink’ notice that lasts for a period of 48 hours or more, either:

- A payment to affected household customers of £10 per day triggered at the third day of a notice, up to a maximum of the customer’s annual clean water charges
- A payment to affected non-household customers of £20 per day triggered at the third day of a notice, up to a maximum of the customer’s annual clean water charges.

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These payments would be triggered at the third day of a notice but would be backdated to include payments for the first and second day.

Additional applications for payment could also be made by non-household customers where particular disruption is experienced, for companies to consider on a case-by-case basis.

Consultation questions on drinking water quality notice standards

1. Do you agree with the proposed introduction of drinking water quality notice standards?

- Yes
- No (Please explain)
- Unsure

If you selected "No", please explain. Please limit your response to 500 characters or less.

2. Do you agree that the proposed payment of £10 per day triggered at the third day of a notice is sufficient for household customers?

- Yes
- No (Please explain)
- Unsure

If you selected "No", please explain. Please limit your response to 500 characters or less.

3. Do you agree that the proposed payment of £20 per day triggered at the third day of a notice is sufficient for non-household customers?

- Yes
- No (Please explain)
- Unsure

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If you selected "No", please explain. Please limit your response to 500 characters or less.

2.3e: Other new standards:

While Defra's own research and engagement, CCW's research, and Ofwat's 2018 recommendations have formed the basis of these proposals, we are interested in hearing your thoughts if there are any additional standards that have not been considered above that you would like to see introduced.

Consultation Question:

1. Do you have any additional ideas for standards beyond that which is suggested in Part 2.3?
 - Yes (Please explain)
 - No

Part 2.4: Proposals for procedural changes to enable updates to the GSS

This section covers proposed procedural changes to enable effective administration of the GSS scheme.

2.4a: Inflation-based payment review clause

CCW considered Ofwat's 2018 proposal that the GSS payment values should be futureproofed by the inclusion of a review clause. This would enable Ofwat, in partnership with the UK and Welsh Governments, to review payment values when cumulative annual CPI inflation exceeds 10%.

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CCW's research indicated widespread support for this measure from their customer research and industry call for evidence and working group. Whilst it was considered reasonable, some concerns were raised around the burden on companies to update systems if updates are too regular. It was also emphasised that such a payment review should not take the place of a wider review of the standards to ensure they remain relevant and effective.

In line with Ofwat's 2018 recommendation, we therefore propose that:

A joint Ofwat and UK government review of GSS payment values is triggered when cumulative Consumer Price Index including housing costs (CPIH) inflation exceeds 10%, whereby payment values are uprated with inflation rounded to the nearest £5.

Consultation questions on inflation-based payment review clause

1. Do you agree with the proposal for a joint review of payments to be triggered automatically after cumulative CPIH inflation exceeds 10%?
 - Yes
 - No (Please explain)
 - Unsure

If you selected "No", please explain. Please limit your response to 500 characters or less.

2. [For water companies and retailers and regulatory bodies] Are there any challenges in implementing these proposals that you would like to highlight?
 - Yes (Please explain)
 - No
 - Unsure

If you selected "Yes", please explain. Please limit your response to 500 characters or less.

2.4b: Automatic payments

CCW also considered mandating that GSS payments, where possible, are made automatically by companies for breaches of the standards, and that in addition, penalty payments for failing to make payments for certain standards are also automatically enforced. This would require that at the time a company registers a standard breach, either through their own monitoring or through a customer complaint, the GSS amount automatically becomes payable to the affected customer. On the basis of Ofwat's 2018 recommendations, there is widespread agreement that penalty payments should be automatic where a company fails to make a payment for breaching a standard regarding appointments, complaints, account queries or payment arrangements. In addition, there is general agreement that where reasonably practicable, companies should automatically make GSS payments for breaches at the earliest possible time after they are made aware of the breach. This is already practiced by most companies.

Therefore, we propose that:

- A standard mandating that GSS payments should be made automatically where possible, and where companies can be reasonably aware of a standard having been breached
- A standard mandating that penalty payments for failing to make a GSS payment should be made automatically for the customer service standards, consistent with Ofwat's 2018 recommendations

Consultation questions on automatic payments

1. Do you agree with the proposal that GSS payments should be made automatically to the extent practicable?
 - Yes
 - No (Please explain)
 - Unsure

If you selected "No", please explain. Please limit your response to 500 characters or less.

Part 2.5: Optional further questions

All questions in this section are optional.

1. What would be the impacts of these proposals for customers?

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Please limit your response to 500 characters or less.

2. The introduction of the PSR standard is intended to provide protection for vulnerable customers. Are you aware of any additional aspects of consumer protection that these proposals do not sufficiently provide for?

Please limit your response to 500 characters or less.

3. What would be the impacts of these proposals for vulnerable customers?

Please limit your response to 500 characters or less.

4. Is there anything related to protection for vulnerable customers that has not been included in these proposals?

Please limit your response to 500 characters or less.

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5. What is your experience of the provision of services to customers on the Priority Services Register, either in your capacity as a customer or as a company?

Please limit your response to 500 characters or less.

6. Do you have any further evidence to indicate the likely number of breaches and cost of implementation of the proposed new standards that you would like to share?

- Yes (Please explain)
 No

If you selected "Yes", please provide your evidence. Please limit your response to 500 characters or less.

7. Are you aware of any potential disproportionate impacts of the updated standards on small and micro businesses?

- Yes (Please explain)
 No

If you selected "Yes", please provide your evidence. Please limit your response to 500 characters or less.

Summary for consultees

Government wishes to gather perspectives on these recommendations for updates to the GSS, in order to inform the design of the final intended policy. We welcome comments in response to the questions in the document, in particular on the impacts (intended or unintended) the proposals are likely to have on the different groups which you represent in the sector.

Furthermore, if you are aware of any additional concerns which the proposals may present to your organisation and the groups you represent, we welcome suggestions for alternative standards or options to improve the consumer protection provided by the GSS.