

Performance Framework Impact assessment reviews 2024/2025

September 2025

Introduction

Consumer Scotland's performance framework states that we will conduct two in-depth impact assessment reviews per year.¹

In 2024/2025 we undertook two impact assessment reviews using a case study approach into the following two areas of our work:

- a) The migration of traditional telephone landlines to digital landlines
- b) Climate change, water and Scotland's future

The case study approach has been a useful tool to gain a better understanding of how Consumer Scotland is achieving impact and how we can evidence it.

Details of each of these impact assessment reviews and the impact the work has had is set out below.

Impact Assessment Review 1: Consumers In Scotland and the Migration to Digital Landlines

Introduction:

Impact lead:	Consumer Markets
Date last updated:	May 2025
Outcome sought:	<p>Regulators, providers and decision makers in Scotland fully understand the impact of the changes on consumers in Scotland and take steps to manage risk appropriately.</p> <p>Organisations providing advice and support to consumers are able to access the advice and information that they need to help them effectively support consumers.</p> <p>Consumers are aware of the coming changes to voice calls and are supported to take appropriate action to ensure their continued safety.</p>
Period when the impact occurred:	December 2023 - ongoing

What was the issue?

The current UK traditional landline telephone network is reaching the end of its life and needs to be upgraded. By January 2027, the majority of consumers will have been migrated to Voice over Internet Protocol (VoIP) technology which allows users to make telephone calls over a broadband internet connection instead of a traditional telephone line.

For most customers, switching to VoIP should be straightforward and they will continue to receive what they recognise as a traditional phone service. However, VOIP landlines will not work in a power cut without additional backup systems being put in place. This in turn affects the operation of any devices linked to landlines such as telecare alarms.

We were concerned that the changes may disproportionately impact some consumers in Scotland, that consumers were not fully aware of the change and its impact and that further measures were needed to mitigate risks.

What we did

We undertook in-depth analysis of Scotland-specific data from research by Ofcom's Communications Consumer Panel into the specific impacts on consumers.² Our report, based on this analysis, highlighted some disproportionate risks to consumers in Scotland, particularly those in remote and rural areas. These risks included the fact that consumers in Scotland had:

- Greater than average reliance on landlines
- Poorer than average mobile phone signal, and
- More frequent and longer lasting power cuts.

Taken together, these factors affect the likely ability of consumers in Scotland to make calls in the event of a power cut. Our report made recommendations to telecommunications providers, Ofcom and the UK and Scottish governments on how these risks could be reduced, including recommending additional measures to protect consumers in vulnerable circumstances and improving public awareness.

Following on from this we engaged directly with BT, Openreach and Virgin Media O2 to monitor and seek to influence their migration process and wrote to the UK and Scottish Government in March 2024 highlighting our recommendations. After the general election, we followed this up in December 2024 by writing to the Department for Science, Innovation and Technology Minister highlighting again the risks to some consumers in Scotland. We also raised concerns with Ofcom that incident reporting thresholds are not sufficient to capture the severity and frequency of outages that occur in rural areas and that this disproportionately affects consumers in rural Scotland.³

What impact has this had? What difference did it make?

In May 2024 BT group announced that they were delaying the deadline for the switchover from the end of 2025 to January 2027.⁴ In their response to our letter, the UK Government agreed that, “public awareness of the migration could be improved”.⁵ The UKG separately announced that a telecoms industry-led national communications campaign focused on telecare users would be developed.⁶ This campaign launched in June 2025, targeting telecare users and their loved ones to raise awareness of the switchover and the need to contact their provider. By engaging directly with BT, Openreach and Virgin Media O2, we have influenced the design of provider’s engagement programme in Scotland. For example, BT’s programme has included visiting around 50 locations in Scotland, with further outreach planned this summer, in partnership with Neighbourhood Watch Scotland and AbilityNet. BT have also worked with RNIB and RNID to user test migrations in practice and to learn from feedback.

In November 2024, the UK Government agreed that communications providers would be able to resume migrating vulnerable consumers after an industry wide pause on migrations had been agreed (following a number of adverse events) in December 2023.⁷ The Government published a checklist for non-voluntary migrations which communications providers must comply with.⁸ This provided guidance on how providers could identify consumers most in need of support during the migration and included reference to risks raised by us and other stakeholders such as landline reliance, mobile signal issues and telecare use. The inclusion of temporary and circumstantial vulnerabilities reflects concerns raised by us and other stakeholders about the impacts on consumers, particularly those in remote and rural areas. In addition, and in line with our expressed concerns, providers have also been urged by the UK Government to extend the scope of backup measures in place in the event of a power cut and are continuing to improve the operational length of handset and battery backups and other solutions.

Ofcom has also undertaken further work to understand where additional power back up for infrastructure sites such as mobile cell sites may be required and will look again at the reporting threshold issues.⁹ In the response to the consultation Ofcom noted the following (which represents a notable shift in their position):

“Consumer Scotland and ACS [Ofcom’s Advisory Committee Scotland] both highlighted concerns that Ofcom’s incident reporting thresholds are not sufficient to capture the severity of outages that occur in rural areas [...] As a result over the coming months, Ofcom will conduct further analysis to determine if additional resilience measures are needed for mobile telecoms infrastructure.”¹⁰

What next?

We continue to engage with Ofcom, the Communications Consumer Panel and communications providers to monitor progress and to identify risks to consumers and ways to mitigate these, for example by improved backup solutions, or better communication. As

migration progresses, work with the Communications Consumer Panel and others to identify good practice and areas of improvement for later migration.

We are also engaging with the Scottish Government and local authority stakeholders to facilitate improved data sharing which may enable providers to more easily identify consumers who need support. We are also working with stakeholders such as TSS to ensure that potential for scams to occur during the migration process is identified and risks mitigated where possible.

Impact Assessment Review 2: Climate change, water and Scotland's future

Introduction:

Impact lead:	Water team
Date updated:	May 2025
Outcome sought:	<p>Strategic decision makers within Scotland's water sector (Scottish Government, regulators and service providers) understand what consumers need to adapt how they engage with water and wastewater services to meet the needs of climate change.</p> <p>Policy and decision making is influenced by consumers' views on a range of policy options relating to water resources, sewerage and drainage.</p> <p>Consumers' views on where responsibility should lie for tackling climate change challenges in the water sector are considered within policy making.</p>
Period when the impact occurred:	April 2023 - ongoing

What was the issue?

Over the next few decades, climate change will put increasing pressure on Scotland's water resources. On the one hand, climate change means we can expect to see more frequent and extreme storms. Scotland's existing drainage infrastructure is often overwhelmed by the increased intensity of rainfall leading to sewerage and surface water flooding higher levels of surface water flood risk. At other times of the year, water scarcity is an issue. According to Scottish Water's latest projections, without adaptation,

by 2050 Scotland could be running short of 240 million litres of water a day. This deficit will be compounded by population growth, particularly in the east, which has fewer renewable water resources to rely upon.

The legislation (1968 onwards) underpinning the water sector and its duties in terms of the provision of safe drinking water and the safe return of wastewater to the environment is outdated and does not support the sector to respond to the pressures of climate change. The Scottish Government is leading climate change policy development work to draft new legislation that will support climate change adaptation in Scotland. Consumer Scotland sits on both the Scottish Government Working Group and Steering Group for policy development work.

What we did

Our water team identified that there is a strong, clear role for consumers to support water sector ambitions in this area but there was a lack of evidence on consumer views on their role in relation to climate change adaption in the water sector.

In 2023, we commissioned research to help us better understand consumer views on climate change adaptation in the water sector so that we could ensure that the interests of consumers were being represented in any proposals for reform. The aims and objectives of the research pointed towards a deliberative methodology being appropriate for the project due to the complex and multi-faceted nature of the topic. Stakeholder buy in was going to be essential for the successful delivery of the deliberative nature of research. We also believed that the active involvement of stakeholders throughout the research process would help to ensure that the findings would directly feed into the policy development process and ensure that the interests of consumers were well represented.

To support this Consumer Scotland created an informal steering group comprising of key stakeholders from Scottish Water, Scottish Government and WICS to support the planning and design of a brief for deliberative research into how domestic consumers can and should be part of Scotland's transition to a more resilient and sustainable water sector. This process allowed Consumer Scotland to bring decision makers into a consumer focused space with a clear purpose and output, including inviting stakeholders to participate in the research sessions by presenting specific issues impacting the sector and decision making to participants. It enabled stakeholders to be part of a consumer 'journey' through research, influenced their thinking about consumers, and supported their understanding of what the research would test and why this was important. It also ensured buy-in and support from stakeholders for the research and ensured that it was fully informed by stakeholder insights and priorities.

In May 2024 we published two Consumer Scotland briefings on consumer views on climate adaption in the water section in relation to (a) drainage and wastewater¹¹ and (b) water efficiency¹² alongside the relevant research report from IPSOS.¹³ Our briefings set

out the key findings from the research alongside a set of evidence-based policy recommendations relating to these topics.

What impact has this had? What difference did it make?

These briefings and the research have subsequently been used to influence and inform the development of water policy in a number of ways.

Recommendations have been taken forward in a Scottish Government led approach to:

- developing policy addressing climate change adaptation in Scotland's water sector, which has involved collaborative working across multiple sector to identify and work towards shared outcomes.
- establishing a national conversation, which will engage with the general public and influence how consumers think about and engage with water and wastewater services

Additionally, Scottish Water has launched a new portal providing public information on CSO spills from monitored infrastructure. And new regulations from the UK government banning plastic in wet wipes will come into effect mid-2026.

On publication Consumer Scotland began an engagement programme with stakeholder forums and groups to present and discuss our findings. These included: Delivery Advisory Group, Investment Planning and Prioritisation Group, Water / Energy Nexus carbon workshop, Stakeholder Advisory Group, 50L Home Coalition, the Customer Research Coordination Group, Water Efficiency Working Group, Local Policy Innovation Partnership, Scottish Government Climate Change Behaviours team, Scottish Government Flood Risk Group, Scottish Water Knowledge Network, Scottish Government Climate Change

Behaviours Network. Adaptation Scotland and Waterwise included our research in their monthly newsletters.

Of particular importance is the influence the research and our reports have had on the Scottish Government's Policy Development Working Group and Steering Group by way of high level principles that drew on the research and identified where responsibility should lie, and also on specific policy areas that were in development related to water, sewerage and drainage.

Scottish Government Working Group Development days that formed part of the Policy Development work became instrumental in sharing thinking around the design of the research as well as the findings when they became available. Stakeholders understood the importance of ensuring that draft policy reflects the needs and interests of consumers to support lasting and meaningful changes in terms of how consumers engage with water and wastewater services in a way that supports climate change adaptation.

In 2024, Consumer Scotland was asked to support the Scottish Government to design the Water, Wastewater and Drainage Policy Consultation to ensure consultation questions were formed in a way that targeted the general public and encouraged response. 492 consultation responses were received, the majority of which were from members of the public.

In July 2024 a summary of Consumer Scotland's research and our key conclusions was included as a standalone Annex in the Scottish Government's Water, Wastewater & Drainage Policy Analysis of consultation responses.¹⁴ It was also cited within Scottish Government Ministerial briefings on Policy Development work. Additionally, the briefing informed a Ministerial Roundtable on water resource planning (WRP) with the Minister for Agriculture and Minister for Green Skills, Circular Economy and Biodiversity.

The Scottish Government lead for this work has confirmed that,

"The research has been influential in the ongoing Policy Development workload as [it] has ensured the voice of the consumer has been fed into the process, and been useful that their views have been supportive of the policy approaches being developed – importantly sharing that legislation is only one of the tools that are needed to adapt to climate change and enable consumers to understand the challenges and what they can do to play their part"

The Scottish Government Flood Risk team also were party to the presentation of research findings and confirmed that we provided a consumer perspective that they did not previously have, and which they will now apply to policy thinking.

Scottish Water also recently commented in their written response to our workplan consultation for 2025/2026 that they have,

"benefited greatly from the new evidence and insights which Consumer Scotland have brought to the water sector in the past year."

Specifically in relation to Scottish Governments ongoing work in relation to modernising the legislation regarding water, waste water and drainage they commented,

"Scottish Water appreciates the role Consumer Scotland plays within this work, particularly highlighting the role customers can play in supporting climate change outcomes and how partnering with customers and communities can help achieve these outcomes."

Members of Consumer Scotland also met with and presented our findings to Audit Scotland, who later stated that until that point, they had not considered the role of consumers when scoping their Climate Change audit, and that our research had prompted

them to think more widely about such issues. Audit Scotland felt that the report was rich in terms of valuable information which provided much to consider regarding relevance to audit work. The quotes from consumers were particularly helpful.

SEPA has also confirmed that the Climate Change Adaptation research may be used as part of the River Basin Management Planning 4 as part of setting out the scale of the challenge on how consumers engage on wastewater, the need for systemic change and the need to invest and make bold decisions to deliver new policy.

What next?

The Scottish Government is undertaking a review of water, wastewater and drainage policy and consideration of legislation, which is important to equip our water industry with the tools to adapt to the accelerating impacts of climate change. The Government is pressing ahead with the policy development to ensure that proposals can be brought forward within the next Parliament. As part of this work, Consumer Scotland has been asked to lead on the Information to the Public workstream.

References

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 - ² Consumer Scotland (2023) *Consumers in Scotland and the transition to VOIP*. Available at: <https://consumer.scot/media/dztly3f2/consumers-in-scotland-and-the-transition-to-voip.pdf>
 - ³ Consumer Scotland (2024) Advocacy letters and responses. Available at: <https://consumer.scot/publications/consumers-in-scotland-and-the-transition-to-voip/>
 - ⁴ BT Newsroom (2024) - <https://newsroom.bt.com/bt-group-refines-its-digital-switchover-programme-for-the-uks-full-fibre-future/>
 - ⁵ [sossotland_ministerlopez-letter-to-consumer-scotland-100524.pdf](#)
 - ⁶ Focused on telecare users only “as a more general message risks creating unnecessary concern or misinformation for the millions of landline customers who need to take no action, including those who have already been moved over.”
 - ⁷ [Vulnerable people using safety alarms to be better protected as government reaches landmark agreements with telecoms industry - GOV.UK](#)
 - ⁸ <https://www.gov.uk/government/publications/public-switched-telephone-network-non-voluntary-migration-checklist/pstn-non-voluntary-migration-checklist>
 - ⁹ Ofcom (2024) Resilience guidance and mobile RAN power back-up consultation statement (see page 19). Available at: <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/272921-resilience-guidance-and-mobile-ran-power-back-up/associated-documents/statement-on-network-and-service-resilience-guidance.pdf?v=379449>
 - ¹⁰ Ofcom (2024) Resilience guidance and mobile RAN power back-up consultation statement (see page 19). Available at: <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/272921-resilience-guidance-and-mobile-ran-power-back-up/associated-documents/statement-on-network-and-service-resilience-guidance.pdf?v=379449>
 - ¹¹ Consumer Scotland (2024) [Consumer views on climate adaptation in the water sector – water efficiency](#)
 - ¹² Consumer Scotland (2024) [Consumer views on climate adaptation in the water sector – drainage and wastewater](#)
 - ¹³ IPSOS (2024) [Climate Change, Water and Scotland's Future Deliberative research undertaken for Consumer Scotland by Ipsos](#)
 - ¹⁴ Scottish Government (2024) [Scottish Government's Water, wastewater and drainage policy: Analysis of consultation responses](#)