

CONSUMER COUNCIL FOR



## **Learning lessons from the 2007 floods**

**An independent review by Sir Michael Pitt**

**CCWater response**

**31 March 2008**

# Consumer Council for Water

## Introduction

The Consumer Council for Water provides a strong national voice for consumers in a privatised water industry.

Our job is to make sure the consumers' collective voice is heard in the national water debate and that consumers' views are pushed to and then remain at the heart of the water industry.

We are an evidence based organisation and use consumer research to shape our thinking and to guide the issues we look at on behalf of consumers

We welcomed the opportunity to contribute to Sir Michael Pitt's independent review of flooding with Sir Michael himself, and through our involvement in the Pitt Review's stakeholder group. At those meetings we have been able to represent consumers by drawing on the results of our research which collated the views of water customers across Gloucestershire who lost their water supply as a result of the July 2007 floods. CCWater managed the two linked pieces of focussed research which were carried out by Accent as follows:

- Response to Loss of Water Supply, September 2007 (Qualitative)
- Domestic Customers' Views on the Loss of Water Supply and Compensation, November 2007 (Quantitative)

We welcome the recommendations made in the Interim Report, many of which align with the critical issues we identified in our October 2007 submission. These included the need to:

- identify key organisations and their responsibilities;
- review the minimum amount of water to be supplied in emergencies;
- reassess infrastructure resilience;
- improve communications with consumers and
- achieve more co-ordinated and collaborative working.

As a representative of water and sewerage consumers, our response focuses on the recommendations and conclusions in the following areas:

- Company preparedness for emergencies
- Communication with consumers
- Infrastructure resilience, including loss of water supply
- Sustainable drainage solutions
- Investment and the periodic review
- Cost implications

## Interim Report - Urgent Recommendations

**REC 6** – The Review recommends that the Cabinet Office, with other departments, should urgently consider the costs, benefits and feasibility of establishing arrangements for the urgent acquisition of supplies during a major emergency, including the use of call off contracts or the creation of national or regional stockpiles of equipment and consumables.

We agree that the urgent acquisition of supplies during emergencies is a key issue that needs to be addressed. In addition to this, we think existing mutual aid arrangements should also be reviewed and reassessed in order to learn lessons from the summer floods and particularly the loss of water supply in Gloucestershire, the scale of which was unprecedented.

In Gloucestershire, the initial response to the loss of water supply was slow. In order to distribute enough bowsers and bottled water to consumers, Severn Trent relied heavily on existing mutual aid arrangements with other water and sewerage companies. Our research shows that customers considered that Severn Trent's management of the location and filling of the bowsers was not as effective as the provision of bottled water. Whilst the majority of customers felt that Severn Trent had done its best under the circumstances, 10% of customers did suggest that more bowsers should have been provided.

The review of mutual aid arrangements that Water UK has proposed in its review of flooding could provide valuable information to assist the Cabinet Office with its decision about whether national or regional stockpiles of equipment are most appropriate, and inform the detail around that decision.

**REC 8** – The Review recommends that the guidance currently under preparation by Cabinet Office, to provide local responders with advice on the definition and identification of vulnerable people and on planning to support them in an emergency, should be issued urgently.

We agree that the Cabinet Office should urgently issue advice on the definitions and identification of vulnerable people, and we understand that it has now issued its initial guidance on this issue. This guidance needs to be broad enough to cover any emergency situation, be it flooding, loss of supply, terrorism or other incident, but also specific enough to cover the situation and the individual circumstances. Consideration will need to be given to situations where emergencies cross local boundaries to ensure that there is a consistent approach to identifying and supporting vulnerable people.

Our research clearly demonstrated that during the loss of water supply, the term 'vulnerable' took on a whole new meaning. Severn Trent's own vulnerable group lists did not include people who were unable to carry bottled water, or who needed special bottled water for babies. Lists containing this information can be obtained from councils and GPs, but in emergency situations this can waste valuable time if organisations have concerns over sharing information due to Data Protection issues. The Cabinet Office's guidance on vulnerable people should help to provide clarity around Data Protection issues to ensure that during an event, emergency responders are able to get instant access to an up to date list of consumers with specific needs.

**REC 10** – The Review recommends that Category 1 responders should be urgently provided with a detailed assessment of critical infrastructure in their areas to enable them to assess its vulnerability to flooding.

As category 1 responders take the lead in managing emergency situations, we agree that they should be provided with information about critical infrastructure in their areas. However, as it is category 2 responders (which include water companies) who maintain detailed plans and records about their assets, it seems more sensible for them to assess the vulnerability of the asset to flooding. We do however agree that this information needs to be shared between the parties in order to ensure a better understanding of assets so that in the event of an emergency, the actions from category 1 responders are well-informed.

**REC 12** – The Review recommends that Local Resilience Forums urgently develop plans to enhance flood warnings through ‘door knocking’ by local authorities based on an assessment of the post code areas likely to flood.

We agree that ‘door-knocking’ could provide an important means of direct communication, especially where there are power outages, we do have some concerns over this proposal.

Any information delivered through ‘door-knocking’ needs to be clear, consistent and accurate, so as not to cause panic or misunderstanding. The public would need to know in advance about this form of communication, so that they know what to expect.

Local resilience forums would also need to consider ways to protect against bogus-callers. CCWater is a member of a Home Office working group looking at the issue of how to raise the public’s awareness of distraction burglaries. Where water company officials call at people’s houses, we expect them to carry appropriate identification and to accept any consumer’s request to wait while their details are checked and verified with the company they represent. The local resilience forums should consider similar measures as are in place for all other ‘door knockers’.

If ‘door-knocking’ does take place, this should not just be limited to advising of flood risk. Given that local resilience forums will need to understand the risks associated with critical infrastructure, they should also be providing messages, supported with written information, about the likely disruption to water and power supplies, and what to do in such a situation. A check of the accuracy of the ‘vulnerable list’ should also be carried out during these door to door visits.

**REC 13** – The Review recommends that Local Resilience Forums urgently make arrangements to involve local media representatives in the local preparedness and response to support their public information role.

We agree that those responsible for managing the emergency response need to engage with the media in order to communicate directly with the public and give clear consistent messages. Respondents to our quantitative research were clear that what they wanted to see in such events was direct communication from the people responsible. This view was shared by respondents to our qualitative research who also felt that in the case of declared disasters, information should be provided through clear bulletins at specified time slots. In order to achieve this there needs to be a clearly defined communications process which is consistent nationally, regionally and locally.

## Interim Report - Interim Conclusions

**IC 3** The interim conclusion of the Review is that the Environment Agency further develops its tools and techniques for predicting and modelling river flooding especially to take account of extreme and multiple events; and takes forward urgently work to develop similar tools and techniques to model surface water flooding.

We agree that the Environment Agency should further develop its predictive and modelling tools for all aspects of flooding (coastal, fluvial and pluvial), and include in that modelling, assessments of groundwater and saturation levels. This work could involve collecting data on surface flows from water and sewerage companies and where relevant, local authorities, in order to give a fuller picture of flows and ‘ponding’ of surface water.

Respondents to our research were clear that they never want flooding or the loss of water supply to happen again. The development of tools for predicting and modelling flooding should improve knowledge about flood risk and thus help planners to mitigate against such events.

**IC 8** The interim conclusion of the Review is that PPS25 should be rigorously applied by local planning authorities including giving consideration to all sources of flood risk and ensuring that developers make a full contribution to the costs both of building and maintaining any necessary defences.

We agree that local planning authorities need to rigorously apply PPS25, and the accompanying guidance (PPG25), in order to ensure that development only takes place on floodplains where it is assessed that there is no significant risk of flooding. Where development does take place on floodplains, developers should be required to adopt sustainable drainage solution and create water storage areas to further mitigate the risk of flooding and to prevent new developments from exacerbating existing problems. They should also be required to demonstrate that they have taken into account, and mitigated, the impact that inundation of the foul water sewerage system may cause further downstream.

In addition to the more rigorous application of PPS25 and PPG25, we would like to see water and sewerage companies as statutory consultees in the local authority planning process. This would ensure that proper consideration is given to the capacity of the public sewerage system to carry the additional demand placed on it by new developments.

**IC 9** The interim conclusion of the Review is that householders and business owners should no longer be able to lay impermeable surfaces as of right.

We support the principle behind preventing householders and business owners from laying impermeable surfaces. We note that in the Government’s Water Strategy, it states that the Government intends to introduce legislation later this year that will require planning permission for impermeable surfaces in front gardens. Clearly this will need clear communication with householders and businesses to ensure that they understand the changes, why they are being made and how they will be affected.

We expect that it may be easier to enforce the requirement for permeable surfaces on new housing developments by making it a requirement that all new surfaces (e.g. footpaths, drives) must be permeable, and that soakaways should be encouraged where ground conditions allow.

**IC 10** The interim conclusion of the Review is that the automatic right to connect surface water drainage of new developments to the sewerage system should be removed.

Defra are currently consulting on the automatic right to connect surface water of new developments to sewerage systems. We will be responding to that consultation and will share our full response with the Review Team. However, our initial view is that developers should be encouraged to consider more sustainable drainage solutions that more effectively deal with surface water run off, such as attenuating flows, and thus reduce the risk of flooding. Removing the automatic right to connect would force them to do this, but may also lead to localised solutions which do not provide a more regionally balanced solution.

**IC 17** The interim conclusion of the Review is that local authorities should lead on the management of surface water flooding and drainage at the local level with the support of all responsible organisations including the Environment Agency, water companies and internal drainage boards, the Highways Agency and British Waterways.

We agree that the management of surface water drainage issues will require partnership arrangements. CCWater is a member of the Project Board for Defra's integrated urban drainage pilots. So far, the evidence from those pilots is indicating that the Environment Agency, as a national organisation, appears to be best placed to take the lead on surface water management.

The Environment Agency currently has an 'over-arching' view of the factors that contribute to flooding and has a history of gathering information from local authorities and water and sewerage companies in order to assess environmental impacts. This knowledge and expertise is likely to be valuable to such partnership arrangements.

**IC 20** The interim conclusion of the Review is that local Surface Water Management Plans as set out under PPS25 should provide the basis for managing surface water flood risk. These plans should be coordinated by the local authority and be risk-based considering all sources of flooding.

Surface Water Management Plans are a welcome arrangement for effectively identifying both flooding risks and solutions to mitigate the risks, requiring the involvement of all the relevant stakeholders (water and sewerage companies, local authorities etc.). Given the fragmented responsibilities for surface water drainage, Surface Water Management Plans will deliver the strategic co-ordination necessary to deliver effective solutions for reducing flooding risk. Defra's current consultation on improving surface water drainage will lead to a detailed protocol for the drafting and execution of these plans.

**IC 21** The interim conclusion of the Review is that a local register of all the main flood risk management and drainage assets (overland and underground) should be compiled by the relevant local authority including an assessment of their condition and details of the responsible owners.

We agree that there is a need for one organisation to co-ordinate information on local drainage assets in order to better understand and manage flood risks. Collation of this information should also help to clarify who is directly responsible for which assets, which did not always appear to be clear to consumers during the floods. However, if local authorities are to take this forward we expect that there would need to be consideration of how to manage assets at the fringes of their areas, i.e. where local authority boundaries do not tally with water company boundaries, or where drainage infrastructure spans a number of local authority areas, as is very clearly demonstrated in London.

If local authorities do take the lead, we think it could be helpful to have clear and consistent rules, at a national level, setting out how often local registers will be kept updated and how the assessment of asset condition will be carried out. The existing condition grading for a water and sewerage company's sewerage network may not correspond or be comparable to the grading used for a local authority's gully or drainage channel. Similarly, different water and sewerage companies may grade their assets differently. A consistent approach would be required to ensure information was useful and comparable, but which was not expensive or cumbersome to implement.

**IC 22** The interim conclusion of the Review is that Defra should issue guidance on how all organisations can be brought together to work with local authorities on surface water flood risk management sharing information modelling and expertise on a consistent basis.

Given that water and sewerage company regions do not overlap neatly with local authority boundaries, and that the condition of assets may be assessed differently by different organisations, we agree that Defra, and the Welsh Assembly Government, will need to issue guidance on how organisations should work together on surface water flood risk management and the standards and approaches they should be following. The Defra Integrated Urban Drainage pilots are working towards establishing this guidance.

**IC 23** The interim conclusion of the Review is that the Government as part of its Water Strategy should resolve the issue of which organisations should be responsible for the ownership and maintenance of sustainable drainage systems.

We agree that there is a need to identify which organisation should be responsible for the ownership and maintenance of Sustainable Urban Drainage Systems (SUDS). We expect that Defra's integrated urban drainage pilots will bring clarity about where this responsibility should fall. We would hope that clarity around responsibility would eventually encourage greater take up of SUDS schemes as an option for managing surface water, and hence reduce the risk of significant flooding.

**IC 24** The interim conclusion of the Review is that Defra should work with Ofwat and the water industry to explore how appropriate risk based standards for drainage systems (including pumping stations) can be achieved.

We agree that there could be benefit in developing risk based standards for drainage systems as this could help with decision making during the development and delivery of emergency plans. However, the management of drainage systems is complex and changes to one area of the network can have significant and unexpected impacts on other areas of the system, if modelling is not undertaken. Detailed modelling of sewer flows would be needed to ensure that any improvements do not just move the problem elsewhere within the system, or exacerbate the local problem. This would be a significant operation for water and sewerage companies with associated cost implications. We would be cautious about the level of expenditure that would be required in this area, if the final risk based standards delivered little benefit to customers.

**IC 25** The interim conclusion of the Review is that as part of the forthcoming water industry pricing review the water companies in conjunction with local authorities and other partners should develop proposals for investment in the existing drainage network to deal with increasing flood risk.

We support collaborative working between water and sewerage companies, local authorities and other partners as all currently have different responsibilities for drainage and need to adopt a collaborative approach. Whilst we accept that investment in water and sewerage assets should fall within the regulatory regime, and therefore be managed through the price review process set by Ofwat, we do not think it is appropriate for investment in assets that are not owned by water companies to be funded through this process (e.g. Local Authority or Environment Agency assets). Ofwat may ask companies to review their current risk based approaches in respect of the management and maintenance of the sewerage infrastructure, to better understand the impact of their current approach.

Given the number of organisations involved in drainage issues, parties would need to all agree how the overall investment needs for a scheme would be met and which organisations would fund, deliver and maintain the scheme, and in what proportions. This would be difficult as the organisations will be funded at different times and through different mechanisms and because of the need to ensure any funding was based on a cost benefit analysis by the sponsoring body.

**IC 42** The interim conclusion of the Review is that the Local Government Association should consider how best mutual support might be enhanced between local authorities in the event of a future wide-area emergency.

We consider that this conclusion should be wider than just the Local Government Association. In the case of the loss of water supply in Gloucestershire, Severn Trent was only able to provide bowsers and bottled water through the existing mutual aid arrangements it had with other water companies. We think that all organisations that rely on mutual aid should review their arrangements in the light of the 2007 floods. It is also necessary to see cross boundary arrangements are tested against scenarios to ensure they are robust and practiced.

The recommendation put forward by Water UK in their review on the emergency response to the summer floods contains some detailed proposals on mutual aid. It suggests that consideration should be given to the technical compatibility of assets, number and readiness of such assets, the means of deploying staff and the resilience of the mutual aid scheme to simultaneous events. We agree these are critical areas which need to be considered to minimise the detriment suffered by consumers in these situations.

**IC 45** The interim conclusion of the Review is that Defra should review the current requirement in emergency regulations for the minimum amount of water to be provided in an emergency, to reflect reasonable needs during a longer term loss of mains supply.

We agree that Defra should review the minimum amount of water to be supplied in emergencies. It is clear from the Gloucestershire loss of supply that whilst the existing Security and Emergency Measures (Water and Sewerage Undertakers) Direction 1998 (SEMD) requires water companies to provide a minimum of 10 litres per person per day, Severn Trent provided 20 litres per person per day in addition to supplying around 3 million litres of bottled of water each day.

In this situation, just over half of the respondents to our quantitative research felt that that they had experienced a 'lot of inconvenience' as a result of losing their water supply even with double the daily recommended minimum water available to them. The main ways in which respondents were inconvenienced, in order of priority, were through being restricted or not able to use the bath/shower, flush the toilet, wash their clothes or wash up. Some respondents to our qualitative research also said that in addition to the drinking water they received, they would have been happy to receive a supply of non-drinkable water just so that they could continue to flush

their toilets. This however would create complications due to the need to identify that the water is not fit for drinking.

Our research identified that during the loss of supply, some consumers did find alternative water supplies by taking water from streams or using water from their garden water butts to flush the toilet. In August, after water supplies were restored, a third of respondents to our research said that they had implemented further water saving measures. The most popular was water butts. In November, nearly three quarters of these customers were still adopting their water saving measures.

**IC 53** The interim conclusion of the Review is that the Government should develop and issue guidance on consistent and proportionate minimum levels of protection from flooding for critical infrastructure.

Currently, in the water industry, assessments of asset resilience are driven by the internal risk management processes of water companies, rather than directly by the regulator. There does not appear to be any scrutiny from the regulator around how effectively companies are protecting their assets from events such as flooding and terrorism. Resilience is however closely monitored by the security services to ensure that key economic sites are identified and suitably protected based on the risk.

We therefore agree that it would be helpful for Government to develop national guidance on the minimum levels of protection water and sewerage companies, local authorities and other organisations must meet for critical infrastructure. This would ensure a consistent approach across the country and make it easier to scrutinise plans to ensure that all parties are managing risk to an appropriate level.

However, in prescribing minimum standards, Government will need to be clear about what it classes as ‘critical infrastructure’ and how the minimum standards sit within the regulatory framework. There is a danger that if minimum standards are applied too widely, the resulting investment requirements could be disproportionate to the benefits. It may be more effective for the Government to set minimum standards for key strategic assets (such as those with single points of failure) and then allow the regulatory process to determine whether the investment required to meet those minimum standards is cost beneficial and thus justified. Any guidance on minimum standards will be needed urgently if it is to inform companies’ draft business plans for the forthcoming price review.

In Ofwat’s report on ‘Water and sewerage service during the summer 2007 floods’, Ofwat has committed to develop guidance this year to ensure that companies identify the right set of measures to improve resilience. However as Ofwat is still in the early stages of this work, it is not clear how prescriptive this guidance will be, or whether it will specify standards for resilience. This guidance will need to develop in conjunction with the proposed Government guidance on minimum standards for resilience to ensure that the two are consistent and realistic.

**IC 54** The interim conclusion of the Review is that infrastructure operating companies should present the case for further investment in flood resilience through the appropriate regulatory process.

We agree that where water and sewerage companies require further investment to increase the resilience of their assets against flooding, this should be something that is considered within the existing regulatory framework. This allows the regulatory process to determine the investment

outputs and balance the proposals against the cost. However, we do not consider that it would be appropriate for generic flooding issues to be considered through this process.

The price review process provides all water and sewerage companies with the opportunity to assess their assets and identify cases where additional resilience levels are required. Our qualitative and quantitative research strongly indicates that whilst customers never want flooding and loss of supply to happen again, they are not prepared to provide the funding to ensure this.

The research concluded that:

- 78% of respondents would not be prepared to pay anything further on top of their current water bill to ensure that they do not lose their mains water again,
- 76% would not be prepared to pay anything to ensure that the treatment works do not flood again.

As companies are required to carry out cost benefit analysis for all investment proposals at the price review, it must be recognised that whilst resilience schemes may be identified, they may not always be approved for delivery on the final Strategic Business Plans set by Ofwat. If the costs far exceed the benefits to customers, either because the risk of loss of supply is low, the costs are high or the number of customers affected are small, then Ofwat will be unlikely to approve such schemes. The reasons for that will need to be carefully communicated to customers who now, more than ever, expect the minimisation of the risk of flooding and loss of supply by companies.

**IC 55** The interim conclusion of the Review is that a duty should be introduced on critical infrastructure operators to have business continuity planning to BS 25999 in place to more closely reflect the duty on Category 1 responders. This should include minimising the loss of supply as far as practicable in the event of a serious emergency resulting from flooding.

Given the scale and nature of the loss of supply that took place in Gloucestershire, we support moves to ensure that water companies' plans minimise the possible loss of supply, or treatment of sewage, in the event of emergencies resulting from flooding. We would also expect that companies should plan to minimise the loss of supply as a result of other emergency situations, which could include other unplanned incidents such as terrorism. Rather than requiring compliance with BS 25999 per se, we question whether companies could instead meet a similar requirement through their existing business and emergency planning process, with the duty enforced through existing licence conditions.

It is important that the phrase 'as far as practicable' or 'reasonable' is included in any assessment as there will inevitably be cases where events are unforeseen or deemed a minimal risk due to a low likelihood of occurrence. In those circumstances it would be inappropriate to carry out enforcement action. However, the loss of supply in Gloucestershire has identified some valuable lessons which must be learned throughout the industry. Respondents to both our qualitative and quantitative research were resounding in their message that the loss of supply should not have happened, and that "this must never happen again, here or anywhere".

**IC 56** The interim conclusion of the Review is that in relation to information sharing and cooperation, the Civil Contingencies Act and Regulations should be extended to require Category 2 responders to more formally contribute information on critical sites, their vulnerability and the impact of their loss.

As with recommendation 10 (REC10), we welcome fuller information sharing between category 1 and 2 responders which should ensure a better understanding of assets, risks and impacts, so that in the event of an emergency, any response is rapid and well-informed.

**IC 57** The interim conclusion of the Review is that single points of failure and the complete loss of assets need to be explicitly considered in the risk assessment and contingency planning undertaken by operators, emergency planners and responders.

In Gloucestershire, the flooding of Mythe water treatment works reflected a single point of failure. The result was that 350,000 consumers were without mains supply for up to 17 days, which, to them, was very serious. The response to the loss of supply was initially slow, as the situation far exceeded any event for which Severn Trent had previously planned.

Involving emergency planners and responders in the risk assessment surrounding single points of failure should help to ensure that if the risk is realised, the response is planned and effective. One of the difficulties with the loss of supply at Mythe was that as the incident was unprecedented, there was no documented plan to follow. Hence, the response to the incident was initially slow as it took time for the message to get out about what help and mutual aid was needed. Also, as Severn Trent was not aware of which areas were served from Mythe, some villages in the Stroud area were initially forgotten.

**IC 60** The interim conclusion of the Review is that the emergency plans and business continuity plans of essential service providers should be reviewed annually by local authority scrutiny committees.

We agree that emergency and business continuity plans that are created by essential service providers should be reviewed independently and on an annual basis. However, looking specifically at water companies, this raises some questions around how local authority scrutiny committees would carry out this 'reviewer' role.

In order to oversee the mismatch of areas, local authorities might need to work together under the direction of a lead authority. It is also important that scrutiny committees across the country are reasonably consistent in their level of challenge so that outcomes are not grossly inconsistent across the country, or between local authorities owned assets and other industry owned assets.

**IC 61** The interim conclusion of the Review is that critical infrastructure planning should become a separate discipline within civil protection at the local level.

For critical infrastructure planning at the local level to be successfully taken forward, we expect that there will need to be clear national standards that are consistently applied in order to ensure a common approach. Complexities in local planning could arise as water company boundaries will not always correspond with local authority boundaries, meaning that several different local authorities could be liaising with one water company over the same, or similar issues. One way to simplify this process could be by co-ordinating planning at a national level through the use of national guidelines that are then implemented locally.

**IC 63** The interim conclusion of the Review is that all reservoir undertakers should be required by Defra to prepare inundation maps and share them with Local Resilience Forums to improve Community Risk Registers and emergency planning.

Given recent concerns around the resilience of the Ulley reservoir in Yorkshire, we agree that all companies or other bodies who own and maintain either significant sized raw water or treated water reservoirs should have plans in place that include inundation maps. As with information on critical infrastructure, we believe it is reasonable for this information to be shared more widely with other agencies involved in emergency planning so that they can fully understand the risks surrounding infrastructure failure.

**IC 68** The interim conclusion of the Review is that essential service providers should maintain continuous provision of public information during an emergency through a website linked to other responders and local authority contact centres.

We agree that water companies should ensure that all methods they use to communicate should be regularly updated with the latest relevant information for the public. Immediately after the loss of water supply in Gloucestershire, some customers had difficulty accessing Severn Trent's website as it was not initially able to cope with demand. Once Severn Trent had remedied this, customers considered that in terms of updates, the website was successful.

*"We found the most accurate means of communication was their website all the way through. It was renewed regularly."*

Consumer from Upton

However, not all consumers have access to the internet, and for some it is not the preferred means of communication, nor possible in the event of power failure. Companies therefore need to ensure that other communication plans are in place alongside internet updates ensuring appropriate methods are used for both the consumers affected and the situation. Our quantitative research shows that the main sources for information during the loss of supply were largely power reliant:

- Local radio, 53% of all respondents
- Television, 48% of all respondents
- Internet, 17% of all respondents

In addition to considering how best to communicate with consumers during power outages, companies also need to consider that during emergencies, consumers may be moved from their homes into temporary accommodation, and it may not be possible to post information or carry out 'door-knocking' due to flooded or blocked streets.

**IC 75** The interim conclusion of the Review is that communication strategies during recovery need to be agreed at the outset by all recovery coordinating groups and focus on reassurance, advice and progress

We agree that communication strategies need to be agreed in advance to ensure that during the recovery phase, consumers continue to receive regular and consistent messages from those responsible. This is supported by the views of consumers who took part in our research who felt that it would be beneficial during emergencies for information to be provided through clear bulletins at specified timeslots.

During the recovery phase, if essential services were lost, such as the loss of water supply across Gloucestershire, it will also be important that assurance is given to consumers on what the parties involved are doing, or have done, to ensure that such an event does not happen again.

Managing the expectations of consumers will be critical to the success of this process. Where it is decided that certain resilience activities will not be carried out because they are not cost beneficial, clear communication will be needed to explain to consumers why this is the case.

The recovery phase could also provide an opportunity for information and advice to be provided to consumers about how they can prepare themselves for dealing with future emergency situations.

## **Enquiries**

Enquiries about this response or requests for further information should be addressed to:

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