

Which? **impact** report

July 2024 - June 2025

Which?



CEO's introduction

I'm proud to introduce our annual Impact Report for 2024/25 to showcase our achievements and the change we've delivered. We estimate that change to be worth as much as **c£550million** to consumers in reduced harm and losses, all delivered against a challenging backdrop for our work.

In a political landscape dominated by a focus on economic growth, we have fought for consumers, emphasising that economic growth is best achieved when consumers have the right protections and enforcement is robust so that bad business practices are outlawed and good businesses can thrive. However, it hasn't always been easy to remind policymakers of the critical value of a consumer lens in their decision-making, in the face of competing pressures and priorities.

This report details our work as the UK consumer champion across our strategic priorities. Through the year, as some of our priorities hit the headlines, it confirmed to me how our strategy has focused in the right places and on the right problems; while the enthusiastic engagement of so many of our supporters also brought home to me how much our priorities really resonate with consumers and their concerns.

1. tackling scams and fraud:

Our fight for better scam prevention activity from government and businesses continued as we saw significant increases in scams originating online and our investigators also exposed how AI is being used to make such scams more convincing and far-reaching than ever.

2. challenging rip-off business practices:

A big focus of our work this year was pricing rip-offs, with a run of bad news stories drawing attention to dodgy practices in retail, hotels, travel and ticketing sectors in particular - and the dreadful experience of Oasis fans buying from Ticketmaster perfectly illustrating the problem and what it costs consumers.

3. driving fairer financial services:

Focusing mainly on the insurance market this year we launched our “End the Insurance Rip-Off” campaign, using new data and real life consumer horror stories to draw attention to the huge financial and emotional impact of poorly handled and rejected claims.

4. making sustainable choices easier:

We believe it remains simply too hard for those who want to reduce their environmental footprint, to do so with confidence - a view confirmed by government research revealing consumer confusion about proposed net zero transitions in home heating, and our own research exposing insidious examples of greenwashing.

5. modernising consumer rights and protections:

We are on a long-term mission to improve consumer protections and to have stronger regulators' enforcement powers that are fit-for-purpose for today's world. This year we've worked on issues including: online safety regulation; unsafe products on online marketplaces; problems in the veterinary services market; and the UK Trading Standards system.

Looking at our achievements this year, I am as always impressed not just by the expertise and skill that surrounds me, but also the dogged determination shown by all our teams in seeking to make the world simpler, fairer and safer for consumers.

Anabel Hault.
CEO, Which?

How Which? creates impact

At Which?, we achieve impact when we reduce the harm or loss experienced by consumers when businesses or markets do not deliver the right outcomes for them.

We make a difference by offering free online **advice and support** as well as specialist helplines and member publications, but our most significant impact, where we tackle consumer problems at scale and at source, comes from our work as the UK's consumer champion. In this role, delivering on our charitable purpose, we use **advocacy and campaigning** to change the world for the better in lasting ways for all consumers, including those who might be most vulnerable to harm or losses.

- an independent voice for consumers

Our consumer champion role is enabled by our rigorous **independent evidence** and everyday engagement with millions of consumers; with around **670,000 supporters** helping us make change happen this year. These enable others to take us seriously and trust us when we point out where consumers are being let down.

- exposing harm, developing solutions

This year we're really proud of the way we've shone a

spotlight on so many consumer problems and delved deep to build insight into complex market failings.

Our activities have been underpinned by numerous studies and investigations produced by our **respected policy researchers and award-winning investigative journalists**, who work closely with our legal and policy experts to support our insight with practical recommendations.

- speaking truth to power

We are well known for **standing up to businesses who let consumers down** - not just calling out household name, high-street brands we think can do better, but also taking on global enterprises, online marketplaces and tech giants whose practices create harm or losses for millions of UK consumers every day - using our own legal powers if we feel it's necessary.

Less well known sometimes is our work in **driving systemic change** where we engage over time with policymakers where we find problems are endemic across a sector or market and systemic solutions are needed such as policy change, regulation or legislation.

For instance, we are currently campaigning to fix the insurance market and to make online



marketplaces more accountable for the safety of the products they sell.

- **fighting for change in the public eye and behind the scenes**

Our **hard-hitting campaigning** has helped shape parts of the most significant consumer legislation of the last decade - including the Online Safety Act; the Digital Markets, Competition and Consumers Act; and the 2024 Financial Services & Markets Act. Just as important as our public campaigning is our **behind the scenes advocacy**, where we assume a variety of roles from thought-leadership on policy reform, to expert adviser, partner or critical friend, helping the government and regulators find ways to let good businesses grow and keep bad business in check.

- **working with others to get more done**

We often work with coalitions and consortia of other like-minded organisations, charities and businesses to drive change, and we run a grant scheme, the **Which? Fund**, to support others to deliver more change for disadvantaged consumers.

Our 2024/25 impact story

Headlines and highlights

This has been a busy, productive year. We estimate that the value of all our impact for consumers this year could be as much as **£550 million**. Millions have benefited, or will benefit in the near future, from our advocacy and our advice. Before we share our progress in tackling our strategic priorities, here are this year's headlines.



We positively influenced major businesses on more than 40 occasions

to describe items honestly or price them fairly; stop selling unsafe items; improve customer service; or respect consumer rights.

We took steps to secure £millions in compensation owed to consumers by market dominant businesses we believe have over-charged them:

launching a £3bn legal claim against Apple and seeking regulator action in response to Ticketmaster's dodgy ticket pricing for Oasis concerts.

We supported regulators' work to tackle business rip-offs and improve consumer outcomes in eight different markets;

using our evidence and ideas to help shape and inform major investigations and business guidance in insurance, retail, telecommunications, energy, veterinary services, the hotel sector, smart technology, and event ticketing.

We helped shape new legislation and new regulatory powers on product safety and scam prevention

(in both cases addressing the responsibilities of online marketplaces) and also saw our influence on a number of key measures proposed within the government's new draft Pension Schemes Bill.

We recognised and encouraged good businesses and helped consumers find companies they could trust thanks to our rigorous endorsement schemes.

We also engaged in partnerships with responsible businesses to help us deliver more for consumers with new partnership projects this year including our popular new Home Energy Planning Service.

Our advice empowered millions of consumers to make easier, more informed choices, save money, and stand up for their rights.

This year we estimate our advice helped consumers make more than six million purchasing and 'life admin' decisions; helped around 40,000 switch to save or simply choose a provider or a deal that better met their needs; and more than 33,000 to make redress claims worth an estimated £19 million against companies who had let them down.

Our advice this year also helped consumers stay safe with regular advice on unsafe products revealed by our testing as well as accessible scams advice.

This year we helped around half-a-million consumers become more scam aware and better able to take preventive action to avoid falling prey to scammers.

What our impact means for consumers

Making confident choices, saving money and avoiding ripoffs



c6m

easier purchasing
and life admin
decisions thanks
to our advice



c40,000

helped by our
comparison services
to find a better
value deal



10,000

helped to plan a shift
to more sustainable
home heating



c£25m

estimated savings
for pay-monthly
insurance customers
as APRs reduce



c33,000

redress claims
worth c£19m
enabled by our
complaints tools



c£130m

in reduced losses
from spending driven
by drip pricing and
fake reviews

Avoiding scam losses and staying safe online



30

unsafe and
fire-risk products
removed from online
marketplaces



c500,000

scam alert
subscribers helped
to become more
scam aware



81%

of subscribers
empowered to take
action that reduces
their scam risk



c£30m

in losses avoided
as new legislation
tackles fraudulent
online content



c19,000

tech helpdesk
callers helped to use
their tech products
more confidently
and securely



c£100m

more in refunds
paid to bank transfer
scam victims via
new reimbursement
scheme

Priority #1: **scams and fraud, data and privacy**

Our strategic priority is to make consumers' digital lives fairer and safer, and our focus this year has been on tackling scams and fraud, and exploring data, privacy and protection issues arising with the emergence of new digital technologies.

scams and fraud

Our recent campaigning helped win new regulator powers to tackle online scam adverts and better reimbursement for bank transfer scam victims (via the Online Safety and Financial Services & Markets Acts respectively). Though these wins will reduce scam losses in time, there is much more for us to do with online scams continuing to rise, and growth recorded in purchase fraud, investment scams, and scams originating on social media marketplaces. This year we have sought better scam prevention from government and businesses, and worked to ensure new legislation effectively

tackles scam adverts. We have also delivered preventive advice ourselves through a free Scams Alert Service.

- We made progress in holding online platforms more accountable for scam prevention.

We produced research and investigations throughout the year to help us build our case for Ofcom to robustly implement the provisions of the new Online Safety Act. Drawing on our legal expertise we also influenced new Supercomplaint rules for the Act so that, once implemented, if platforms still fail to act, we can pressure the regulator for stronger enforcement. While

some change is underway, we will keep up the pressure for change next year, including by making the case with government for additional legislation we believe is still needed to tackle fraudulent advertising.

- We helped drive the appointment of a new Fraud Minister.

We were one of the leading voices campaigning for a dedicated Fraud Minister and a clear UK fraud strategy so we were delighted when the Prime Minister appointed a Home Office Minister with this remit. We have since shared our evidence, ideas and recommendations for tackling

scams at source, and built relationships with the minister and relevant stakeholders to ensure we're well placed to influence the new strategy.

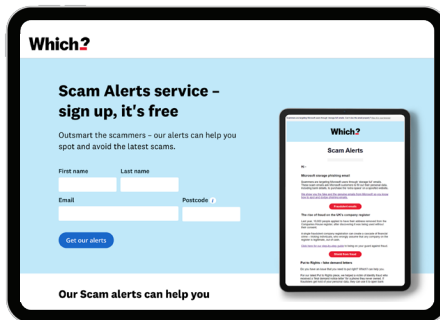
- We started to break down the barriers that prevent scams intelligence sharing.

We're calling for better intelligence-sharing between government and businesses because it's now widely recognised that sharing information as soon as there's awareness of a scam getting started, could help agencies and businesses detect and shut it down quickly and stop it spreading. This year to show what could be possible we started sharing our scams reporting data with the National Cybersecurity Centre, sharing weekly intel updates to help stop scams in their tracks. We also welcomed new ICO guidance that reflected several of our asks on data sharing for businesses.

Andrew's story

"The advert was very convincing... I followed the link and paid to join the platform... an adviser called me almost daily with different instructions about investing... After I realised this was a scam. I got part of my money back from the bank but the rest I lost."

Andrew, tricked by an AI fake ad that was bait for an investment scam



- We empowered half-a-million consumers with scam news and advice.

Our free Scams Alert Service, reached a milestone of 500,000 subscribers - a fitting way to celebrate its 5th birthday. Our most recent impact survey found that 93% of subscribers found our advice helpful and 81% had taken at least one action to reduce their own or someone else's scam risk following our advice. This year we were ranked in a survey by Ofcom as the UK's 2nd most popular scam news source (after the BBC).

data and privacy

With so much of our lives now lived online and new technologies evolving so rapidly, we're concerned that businesses are collecting and using consumers' data in ways many are unaware of, and might not consent to if they were aware. We also know that without adequate protections scammers and fraudsters can access and misuse this data. We have focused this year primarily on smart products.

- We made progress in influencing the rules that protect consumer privacy when using smart products.

Our ongoing research into, and testing of smart products, combined with pressure for change from our tech experts, helped shape new draft guidance on smart tech security from the ICO. The guidance outlines clear expectations for smart product manufacturers and aims to make it easier for consumers to understand

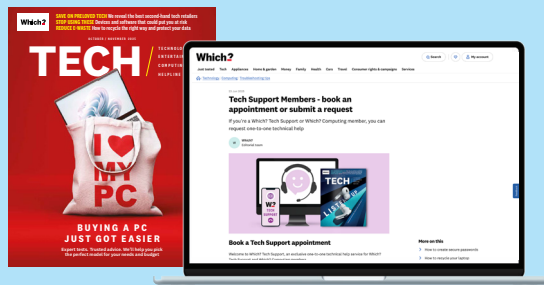
what is being collected and why, and to exercise their rights over their data.

- We helped consumers to better understand the risks to privacy involved in engaging online and with new technologies, and to take steps to protect their personal data.

Via our technology magazine, our free tech newsletter, and free advice online we reached tens of thousands of consumers this year with practical advice on keeping their data safe and more generally on staying safe online. We built

advice on security into our review of smart products and we also gave personalised support to more than 19,000 callers to our tech helpdesk with 86% reporting that our advice had helped them tackle a tech problem and/or feel more confident in their use of technology.

"I had a security issue... I felt very supported as the person who helped me took it very seriously to help me ensure everything on my devices was then thoroughly checked and safer going forward."



Using our technical expertise to expose hidden harms

Our research, “Why is my air fryer spying on me?”, was the latest Which? exposé of excessive smart device surveillance and lack of transparency for consumers about how their personal information is being used.

This year, after working with data protection specialists and drawing on our testing experience, we developed a new privacy framework to reflect what good should look like when it comes to smart devices and privacy. Then working with cybersecurity experts we did a snapshot test of 12 smart products across four categories, assessing

these products against our new framework.

Our results were concerning - from air fryers demanding permission to listen in on conversations and sharing data with TikTok, to TVs wanting to know users’ locations at all times. No product received a privacy framework score much over 50% and we found that consumers faced consequences if they denied consent, e.g. in all but two devices, we couldn’t use its full capability if we declined the privacy notice. The ICO validated our findings and our calls for manufacturers to do better.

“The results from Which?’s testing show that many products not only fail to meet our expectations for data protection as the regulator, but also consumer expectations.”

ICO Principal Policy Adviser

Priority #2: rip-off business practices

We have a long, strong track record in tackling unfair business practices, and last year achieved a great win for consumers when the Digital Markets, Competition & Consumers Act outlawed drip-pricing and fake reviews. This year we prioritised work on unfair pricing practices.

unfair pricing practices

This year we built on last year's success in tackling drip-pricing and used innovative research methods to expose even more dodgy practices; driving change by naming and shaming businesses and seeking regulator interventions where necessary.

- We exposed a range of rip-offs and forced big businesses in the hotel, travel and retail sectors to stop using dodgy pricing practices.

We successfully challenged:

- misleading use of **reference prices** in advertising - e.g. 'was/now' offers or Recommended Retail

Prices (RRPs) - to drive consumers to spend on goods thinking they're getting a bargain (though we found some retailers genuinely unaware they had used reference prices incorrectly).

- use of **bait pricing** (misleading 'prices from' advertising) in the hotel sector where consumers are lured in on the promise of a low price existing (e.g. for a hotel room), only to find that this price doesn't really exist or existed only once a really long time ago.

- **fake special offers and 'discounts'** - e.g. travel companies suggesting that consumers can get a special "mobile only" discount

when in fact the same or even better prices are available to customers booking in other ways, e.g. via laptop. We reported travel firm Expedia to the Advertising Standards Agency (ASA) for these dodgy discounts, which resulted in the firm quickly putting a stop to the practice.

- In our work on the events sector our dossier of evidence from consumers who felt they had been ripped off, helped the Competition and Markets Authority (CMA) investigate Ticketmaster for its selling of Oasis tickets.

We investigated fans' experience with Ticketmaster and identified concerns about 'in demand' pricing,

and reported them to the CMA. The CMA investigated whether they had breached consumer law, also finding they had labelled certain seats as platinum and sold those for 2.5 times the price of standard tickets without explaining they offered no additional benefits and were often in the same area as standard tickets.

- We supported regulators to take action in situations where we found evidence that pricing problems were entrenched or endemic - e.g. in the hotels and supermarkets sectors

- After we shared the results of our bait pricing research with them, the ASA promised its own market-level investigation into bait pricing in the hotel sector.

- This year the CMA also took action in response to Which? calls for change - issuing guidance in line with our asks on retailers' loyalty/ membership scheme

Polly's story

"I waited in a queue on the phone for about an hour and by the time I got through the price had gone up by nearly £120! I didn't feel I had a choice but to pay but it felt really unfair - I should have known upfront that this could be the final cost."

Polly, a ticket ripoff victim

deals to ensure genuine savings are available - including by avoiding misleading back-to-back promotions.

- We took steps to secure £millions in compensation owed to consumers after we felt market-dominant businesses had unfairly over-charged them.

This year as well as our action to try and hold Ticketmaster to account over its Oasis ticket sales practices, we also launched a £3bn legal claim on behalf of UK consumers against Apple. The claim seeks compensation for consumers who we believe have overpaid for cloud

services after being steered to use Apple's own cloud storage for their devices and not being given a choice of provider. We believe this conduct has breached UK competition law. If successful, around 40 million iCloud customers could benefit and be eligible for compensation of up to £70 each.

Using our legal powers to hold big business to account

We launched our collective action case against Apple because we want consumers to be compensated for the loss we believe they've suffered as a result of the company's conduct - the higher prices they paid for iCloud as a result of the lack of competition.

We also want to stop anti-competitive conduct and help create a cloud storage market that works for consumers - where they have a real choice of storage provider and where competition can lead to cheaper and/or better quality cloud services.

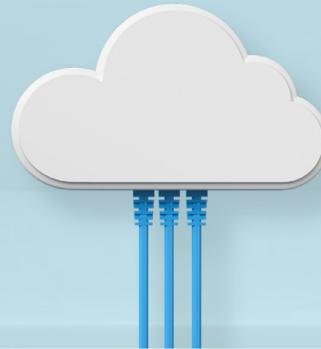
We were instrumental in establishing the UK's collective action regime, launched in 2015, which gives us the ability to bring our case now. Due to the costs and complexity of UK litigation, this regime is the only realistic way of seeking redress on behalf

of a large group of consumers who have suffered a relatively small loss - it wouldn't be realistic or economic for individuals to bring their own claim.

As part of the claim we worked with a third party to launch a claims website (cloudclaim.co.uk). It has information about the claim, an eligibility tool for consumers to check whether they could receive a payout if we win, and a way to register for email updates. Already more than 101,000 consumers have checked in.

The claim process is lengthy and complex, but we think it's worth it, and we're now preparing for the next step - obtaining permission from the Competition Appeal Tribunal for the claim to proceed on a collective basis.

Since 2015, millions of UK owners of Apple devices could have overpaid for their iCloud storage.



What's the Claim?

This website explains the legal claim brought by Which? against Apple. Which? alleges that Apple has breached competition law and is bringing a collective action on behalf of consumers to seek compensation and to stop Apple from treating its customers this way. It's currently estimated that if we're successful, average damages per consumer will be around £70.

What happened?

Which? alleges Apple abused its dominant position by not giving iPhone and iPad users a choice of cloud storage provider.



Priority #3: simpler, fairer financial services

We believe that some financial products and services don't offer consumers the value they should, while others are overly complex and hard to understand. We have focused on making financial markets and services work better for consumers for many years and our award-winning Money Magazine has been helping consumers make informed financial decisions for more than five decades. This year our focus has been on tackling problems in the insurance and pensions markets.

insurance services

We launched our “End the Insurance Rip-Off” campaign in July 2024 to address problems including unjustifiably high premiums; abysmal claims handling that creates significant harm and distress for consumers; and worryingly high proportions of rejected claims.

– Our evidence on shoddy claims handling and poor claims outcomes helped influence the scope of a major Financial Conduct Authority (FCA) claims-handling review.

We regularly met with the FCA

to share our concerns and new evidence, e.g. on third party involvement, and on how products are designed, sold and understood by consumers. Our research on

cover for storm and flood damage, for instance, showed many firms are not meeting reasonable expectations nor industry standards in defining key terms

Diane's story

“I spent Christmas with a hole in the ceiling and had to cancel social arrangements. On top of the inconvenience, extra fuel costs trying to dry out and heat newly draughty rooms, and a lot of stress for the whole family the problem went on so long that damp and mould then triggered a respiratory infection ... the process dragged on for around six months!”

Diane, let down by her insurer after a leak left parts of her home uninhabitable

like ‘storms’. In its report the FCA raised concerns in line with ours about outsourced services and their negative impact on claims, however, it wasn’t clear what steps they would take..

- Our evidence on unfairly high interest rates for pay-monthly insurance customers helped lead to the FCA launching an investigation, and helped drive some reductions in interest rates.

The FCA launched a premium finance market study and we maintained pressure throughout their investigation, using evidence from three surveys of insurance firms to push for action. Our findings were cited in a letter to the FCA’s CEO signed by 78 MPs, echoing our campaign asks. This support, and our public naming and shaming of high charging providers, has seen rates (APRs) start to drop. As the year closed, the FCA published an interim update that agreed with us that premium finance may not represent

fair value for some customers.

pensions

We have long called for changes to make the pensions market work better for consumers - campaigning for a pensions dashboard to help savers manage their pensions and to introduce improvements to the pensions landscape so that people get better returns on their savings.

- This year our long-running work on pensions bore fruit when the new Pension Schemes Bill delivered on two of our campaign calls.

Around 20 million consumers could benefit from new rules that will bring their pots together (small pots autoconsolidation), helping savers see their full pension picture in one place. In addition, a new system to show how well schemes are performing will help consumers understand whether they are getting value for money and could prevent them getting

stuck in an underperforming scheme. By improving transparency and competition this should lead to better outcomes for savers. The government’s aim here reflects one of our own as an organisation - to put more money into people’s pockets!

Dear FCA,
End the Insurance Rip-off
From 170,000 UK consumers

Which?

Campaigning to give consumers a voice

We launched our “End the Insurance Rip-Off” campaign after our research showed that too many consumers are not getting fair value from the products they buy. Our main goal was to influence the regulator (the FCA) to act more decisively to make insurance work better for consumers.

Our campaigning makes change happen by working not just for consumers but with them, so our first step was to engage consumers and give them opportunities to get involved and have their say.

We created a high-profile press and social media campaign and encouraged consumers to let us know about their experiences via a reporting tool and to sign our petition for change. We tapped into a very real concern; it was no time before 170,000

had signed our petition and more than 9,000 shared horror stories that shone a light on the real human cost of problems in this market.

We also worked on building political as well as public support, engaging MPs and the government, and providing a steady stream of hard-hitting investigations, policy reports and briefings that helped us make the news and focus attention on our campaign calls.

We engaged closely with the FCA to make our case for change and we know our evidence and the scale of our support didn’t just make the news but enabled important conversations about our concerns. The campaign will now continue as we identify next steps in response to the FCA’s latest progress updates.

Priority #4: making sustainable choices easier

We know from our research and our conversations with consumers that it remains simply too hard for many who want to reduce their environmental footprint, to do so with confidence. Decisions about 'greener' consumption can feel complex and there is a risk of well-intentioned consumers being ripped off as opportunistic or unscrupulous businesses make misleading claims or deliver services that play on consumers' sustainability concerns but don't really meet their needs.

ensuring consumers have information they can trust

This year we've sought to make sustainable purchasing decisions easier by tackling greenwashing. Since 2021 there has been a UK Green Claims Code that businesses should adhere to but still many persist in using confusing, meaningless and potentially misleading terms such as "all natural", "green" or "eco-friendly".

- We influenced seven manufacturers and retailers to stop using greenwashing in their product advertising or to stop selling 'greenwashed' items.

We used an AI-based analysis of 1,000 advertisements containing green claims to identify any that were vague, unsubstantiated or overblown. We found nearly two-thirds of those ads failed to adhere to at least two principles of the six that make up the UK's Green Claims Code (CMA greenwashing guidance) and we challenged companies to do better.

A key priority for us is to ensure that consumers are better advised about how to make their homes energy efficient and decarbonise their home heating. With the big switchover from gas boilers

coming down the line, many consumers are confused and even anxious about what they need to do and when.

- We developed a strong set of recommendations for supporting homeowners as part of the government's forthcoming Warm Homes Plan (a critical part of its long-term net zero strategy).

After talking to consumers and expert stakeholders and conducting extensive research we ended the year with a set of recommendations we believe will help make the journey to sustainable home heating an easier

and smoother one for consumers and we look forward to promoting our ideas as the government evolves its plans.

- We helped thousands of consumers identify the best routes to a more energy efficient home for them.

We grew our sustainable home heating advice, adding lots of new content about new home heating options, particularly solar panels and heat pumps - with a new heat-pump calculator providing highly popular. We also this year launched a new free Home Energy Planning Service, This service is able to provide households with a personalised, step-by-step plan to upgrade their home's energy efficiency including improvement recommendations, savings estimates, grant matching and options for trusted local installers. By year end the service had helped more than 10,000 homeowners with tailored advice and, from a sample of consumers surveyed

Dion's story

"I know we need to start thinking about switching away from a boiler to a more sustainable heating option. We have picked up this topic several times and put it down again, and not pursued it, and it is principally because we just don't know who to trust"

Dion, explaining why he was happy to find our Which? Home Energy Planning Service

after engaging with the service, we found nine out of ten found our advice useful with benefits including the ability to save money as well as to go 'greener'.

"I am thankful for all the ways listed to save on my energy bills has immensely helped my electricity consumption for a warm home during winter and for me to be in credit"

"I wish I'd had this 18 months ago! The tool lays out all the options for your home and makes it easy to find the right information. The grants section was particularly useful—it's so hard to find out what's actually available. The direct link from the planning service to Which? Trusted Traders will help people to find recommended companies more easily."

Working with businesses to deliver more for consumers

Our Home Energy Planning Service, is built on a partnership with Snugg - a business that makes home energy efficiency simpler for consumers by combining energy know-how with data science and design.

We combined Snugg's retrofit assessment platform with our consumer expertise and advice and have worked closely together to deliver the service and to improve it in response to feedback. For instance we heard from some users that it would help to have a plan suggested to them as a starting point, based on

their priorities, whether quick energy bill savings or interest in heat pumps. So Snugg introduced a step to capture priorities.

Another improvement came when we introduced a dashboard of next steps once a consumer has built a plan, building in the functionality to record traders they've spoken to and what quotes they've had.

The service is now making a difference to thousands of consumers, who really appreciate that the advice they get is both practical and independent.

“This is a very significant collaboration. With just a few clicks, thousands of consumers can now identify and implement suitable home energy efficiency improvements that will have a lasting impact on their homes and the environment.”

Robin Peters, Snugg CEO

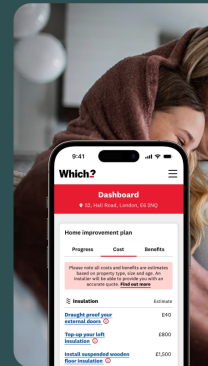
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30/9/2024

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Snugg partners with Which? to power new home energy planning service

Snugg has partnered with consumer champion Which? to launch a groundbreaking free home energy planning service.



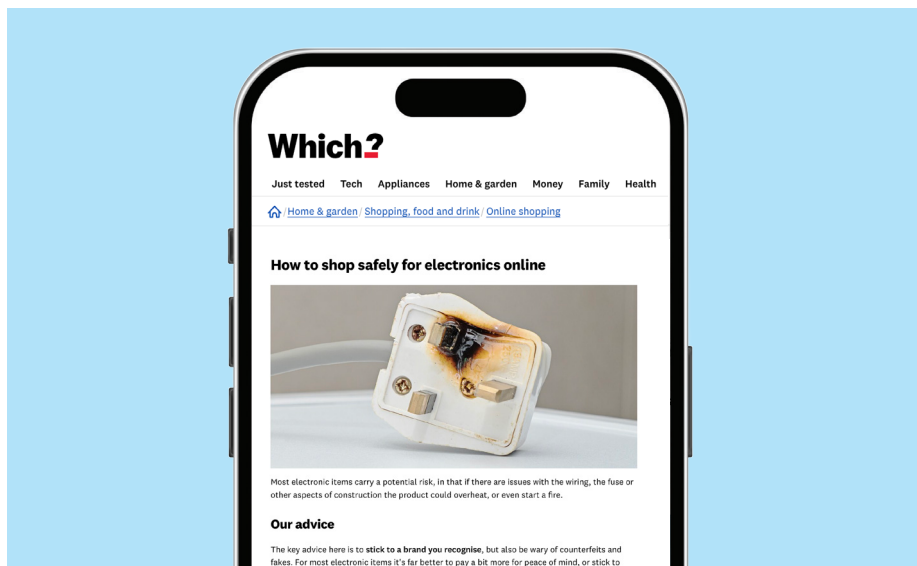
Priority #5: consumer protections & enforcement

Central to our consumer champion role is to make sure that the systems in place to protect consumers and their rights work effectively, including systems for enforcement and redress. We achieved a major win last year when our advocacy helped drive stronger CMA enforcement powers as part of the Digital Markets, Competition & Consumers (DMCC) Act. This year we focused on changes needed in our product safety regime; the veterinary services market; and Trading Standards.

product safety

We have been campaigning on product safety for many years, seeking more effective systems for preventing the sale of unsafe products (particularly on online marketplaces where the problem is rife); recalling unsafe items that do make it to market; and taking action against manufacturers and sellers who put consumers at risk of harm.

- This year we succeeded in pressuring online marketplaces to remove more than 30 unsafe product listings including fire-risk plugs, chargers and heaters, and



toys falling well below UK safety standards.

For example, for one of this year's investigations we found a worrying proliferation of unsafe toys with problems including swallowable magnets, sharp points and strangulation risks being sold on online marketplaces. We successfully pressured those marketplaces to stop listing them for sale.

***"We thank Which? for bringing your test results to our attention and for the improvement of our control mechanisms. The listings of the products that failed the test have been removed."* (AliExpress).**

Though we are pleased when marketplaces act quickly in response to our concerns, our real worry is that we keep finding the same or very similar (and similarly risky or unsafe) items returning for sale within a short time. The problem simply can't be dealt with in a piecemeal way and this

Issy's story

"I bought a a USB plug charger from ... (an online marketplace). It overheated to the point that that I could not touch it without burning my fingers. Even the charging lead became hot. I stopped using it immediately. I can see now that reviewers have mentioned this item being dangerous to use but despite the warnings the item remains on sale."

Issy, a victim of an unsafe product

is why this year we were pleased to welcome new product safety legislation.

- After years of campaigning for an overhaul and modernisation of product safety legislation this year reform became a reality with the Product Regulation & Metrology Act.

We drew on the knowledge and experience of our legal experts and the evidence we have amassed from years of product testing to influence this Act, driving amendments that make

us optimistic that regulations will follow that address our concerns about online marketplaces "falling through the net" of our current product safety laws.

veterinary services

We are concerned about features of the veterinary services market that create problems for consumers. Our research has looked at pricing and lack of transparency as well as poor consumer experiences and difficulty complaining if things go wrong.

- This year we influenced the CMA to broaden the scope of a veterinary services market investigation to address our concerns.

As the CMA announced their market investigation we raised with them our concerns about transparency, medicine costs and poor redress. Based on the remedies then consulted on, we end the year optimistic that the investigation will address some of our concerns and ultimately drive positive change for consumers.

trading standards

There have long been indications that our Trading Standards

system is not working as it should despite being such a critical part of our local, regional and national enforcement system. However, until recently it's been impossible to establish what's working and what needs to change because of a lack of central data about local authority services. We wanted to change this situation and get a conversation started about improvements we think are overdue.

- We used a comprehensive research project to kickstart our new Trading Standards reform project and this helped drive wider understanding of the need for change.

We made a Freedom of Information (FOI) request to all local authorities across the country, and shone a spotlight on how depleted parts of the system are, leading to important consumer protection issues being deprioritised and many consumer complaints not followed up. Our report was

well received and the Consumer Minister recognised this as an area needing attention.

Which?

Trading Standards resources and activities

Findings from freedom of information requests to local authority Trading Standards Services

POLICY REPORT **AUGUST 2025**

Applying our policy expertise to complex problems

Our Trading Standards Freedom of Information research was uniquely based on responses from all 187 services and is currently the only comprehensive source of information on what's happening across services.

Our evidence revealed fragmented, under-resourced services in some parts of the country, operating without the data infrastructure needed for intelligence-led enforcement - a postcode lottery of consumer protection.

Our approach is never to just lay out problems without giving thought to solutions. However, this is a complex ecosystem enforcing hundreds of laws that fall across numerous government departments.

Our solution was to come up with two sets of policy recommendations - for the short-term (immediate interventions to better safeguard consumers in the current system) and the longer-term (recommendations for fundamental reform).

We discussed our recommendations with stakeholders within Trading Standards and relevant government departments as well as business representatives. This generated some interest in our ideas about ways forward in the short-term. We see this as a long-term programme of work but feel we have certainly kickstarted some of the important conversations that need to take place before change can happen.

What next?

Looking ahead to 2025/26

As we reflect with some pride on our achievements in creating impact for consumers in 2024/25, we acknowledge the vital contribution made by consumers themselves - with more than 244,000 supporter actions taken in support of our campaigning efforts this year. We also acknowledge the extra capacity to make change happen that came from partnering with a wide range of organisations including third sector and consumer organisations, universities, think tanks, businesses and trade bodies.

In the year ahead we plan to:

continue to **innovate**, including in partnerships with others, to evolve our advice for consumers to better meet their needs, e.g. looking at how to enhance our existing advice and solutions for real life - including health and wellbeing, life admin and retirement planning;

ensure we remain always ready to **respond** reactively on behalf of consumers, whenever new problems or issues arise and a consumer champion is needed;

build on this year's progress in addressing our strategic priorities with our 2025/26 programme including a range of new activities.

1. scams and fraud, data and privacy: We will continue to seek better scam prevention and intelligence-sharing across government and businesses, and to monitor and support progress in tackling scam adverts via the Online Safety Act. We will also continue our work on emerging technologies and the security of consumers' personal information - still focusing on smart products but also exploring other important areas including the effects of AI.

2. rip-off business practices: We will continue to focus on pricing practices and build on work already started on events ticketing with a new "Stop Fleecing Fans" campaign. This will seek to ensure the government delivers on its promise to tackle the problem of inflated pricing in the secondary ticketing market.

3. financial services: We will continue our work on pensions reform and launch a new phase of our insurance campaign to press for more decisive FCA action on poor claims handling. We will also focus on consumer credit reform and the future of digital payments, including the rules surrounding Buy Now Pay Later.

4. sustainable choices: We will advocate for better advice, financial support, and mandatory certification of installers (e.g. solar panel and heat pump installers) in the Government's Warm Homes Plan, while directly addressing the need for better consumer advice with a new public awareness campaign about the planned switch from boilers to lower-carbon heating options.

5. protections and enforcement: We will continue our product safety campaigning. We will focus on ensuring that the recent DMCC Act delivers as intended for consumers including via a new digital competition regime. We will also push forward with our calls for reform of Trading Standards, including by identifying opportunities for 'quick win' improvements.

To find out more

To deliver the change we want to see for consumers, we will be partnering with many of those who helped us deliver change this year, but we will also be looking to work with new partners so if reading this report has piqued your interest in any aspect of our work to make consumers' lives simpler, fairer or safer, do get in touch.

If you want to know more about our policy and advocacy please visit our website at

<https://www.which.co.uk/policy-and-insight> If you want to know more about our impact please contact us at **impact@which.co.uk**.

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