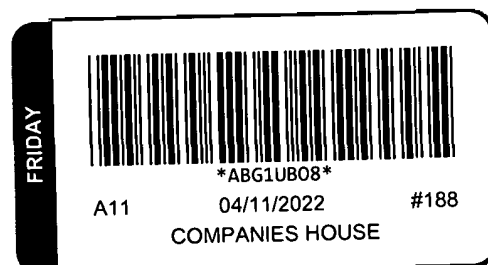


**Which?**

# Annual report

**and Financial Statements  
of the Consumers' Association**



**July 2021–June 2022**



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**Pictures:** some of the members, supporters and colleagues who support our mission to make life simpler, fairer and safer for all UK consumers.

# Snapshot of the year

July 2021 to June 2022



We increased newsletter subscribers to

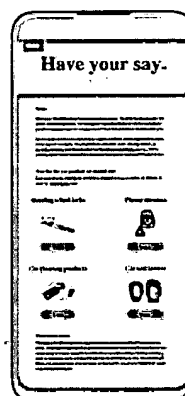
**750,000**

Which? is now certified  
as carbon neutral for  
all UK operations

Our work to get paid-for  
adverts included in a  
proposed Online Safety Bill  
promises to tackle this  
major source of scams.

We increased  
subscribers to our scam  
alert service to

**350,000**



We received  
more than

**6,000**

product testing  
suggestions through  
our Have Your Say  
member email

We welcomed more than

**200** representatives from the UK's top  
brands to our Which? Awards event



We launched the Which? Fund,  
providing grants for research  
into specific areas of consumer  
harm experienced by diverse and  
disadvantaged communities



We now have more than

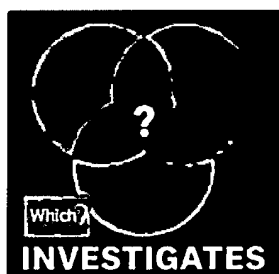
**200** Eco Buys across  
**12** product ranges





We launched the new  
Which? App and it has  
been downloaded  
**142,000** times

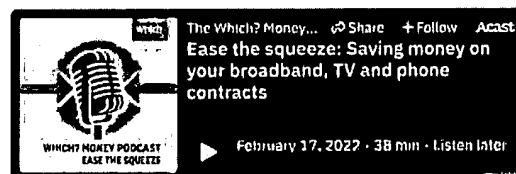
Our flagship  
Which? Investigates  
podcast launched in  
June 2021 and saw  
**125,000**  
downloads across  
**16** episodes



**455** colleagues  
engaged in  
**1057** hours  
of training through  
LinkedIn learning

Our dedicated guide  
on ways to save money on broadband  
bills saw over

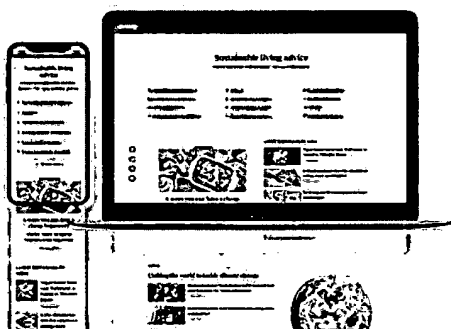
**25,000** unique visits



**Which?**  
**CHEAPEST**  
**SUPERMARKET**

Our Rapid Reviews part of the  
Product Testing team reviewed

**637** new products

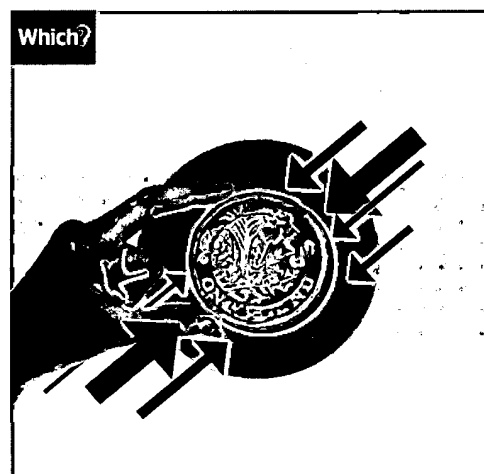


We launched a dedicated  
sustainability hub, bringing  
all our sustainability information  
together in one place

We saw mandatory  
reimbursement for  
Authorised Push Payment  
(APP) scams included in  
the Queen's Speech



Our Legal helpline  
dealt with  
**20,451** cases  
and achieved  
**£767,039**  
in redress and compensation



Our Ease the Squeeze hub  
reached almost  
**7m** people directly through  
our content and our Ease the Squeeze  
podcast was listened to  
**60,000** times

# Welcome



## Welcome from the Chair of the Consumers' Association

I would like to begin by thanking everyone who has supported Which?, we could not have delivered everything set out in this year's Annual Report without your support.

This year, consumers have faced profound economic challenges and Which? continues to be at the forefront of providing help and advice to all UK consumers navigating the cost of living crisis. We have also successfully campaigned for and achieved systemic change in some key areas to help to keep consumers and their money safer. Congratulations to everyone involved across the organisation in getting scams included in the promised Online Safety Bill and

getting legislation for better protection from Authorised Push Payment Scams into the Queen's Speech.

The economic situation is affecting businesses too, and Which? is no exception. We are, however, facing this challenging environment from a position of strength: confident in our strategic direction and fully committed to delivering against our charitable objectives, whilst providing high-quality, expert products and services to our members and customers.

I would like to commend the Leadership Team, as well as all Which? employees, for their commitment, the way they work together and their strategic focus.

I cannot stress enough how essential it is to have a clear direction for the organisation in trying times.

I would also like to thank the Board and Council of Trustees for their ongoing support and expertise. My particular thanks go to Brian Yates, who is stepping down from Council after a number of stints dating back to 1986.

Finally, we are saying farewell to Judy Gibbons as she completes her term as Chair of Which? Limited. On behalf of everyone on Council, I thank her for her invaluable contribution over the past five years to the success of Which?.

**Sam Younger**  
Chair of the Consumers' Association



## Welcome from the Chair of Which? Limited Board

This is my last Which? Annual Report, as I complete my term as Chair of the Which? Board. I am proud to have been part of an organisation that has achieved so much for consumers in the time I have been involved. I have seen how an organisation with a strong sense of purpose and focused business model cannot only survive, but thrive in times of uncertainty.

From a commercial perspective, there is no doubt that things will continue to be tough. We are already seeing both consumers and businesses impacted by the cost of living crisis. What is important is that we remain focused and do not deviate from our strategic objectives.

Which? has delivered some outstanding wins for consumers this year, and I am proud of the positive

impact our commercial activities have had on the everyday lives of consumers. As you know, the commercial activity of Which? Limited is what underpins and funds the Group, and we have to ensure the future of the commercial business if we are to ensure the future of our charitable work.

We have a clear strategy to ensure Which? is on a strong financial footing to achieve this. The shape of our business has shifted over the past few years as we diversify our income sources beyond subscriptions. Five years ago our non-subscription income made up **10%** of total income, while today that has increased to **16%**.

We have been able to do this while improving our member experience by helping them complete their purchase

journey. We also now show links to purchase directly from Which? approved retailers and this provides affiliate income while retaining our independence.

We are continuing to invest in our digital transformation programme to modernise our business processes and deliver a high-quality experience to our users. While this has been challenging we know that it's strategically essential and we are beginning to see progress and reap the rewards.

My thanks to my fellow Chair Sam, to Anabel and the Leadership Team and to the Which? Limited Board for making my time as Chair so rewarding.

**Judy Gibbons**  
Chair of Which? Limited Board

# Chief Executive's Welcome



This year we emerged from the pandemic, only to discover we were heading for the worst cost of living crisis in generations.

This presents huge challenges for both businesses and consumers.

While Which? is not exempt from the business impact, we also have a huge opportunity to demonstrate our unique value as a strong, impartial champion that will fight for all consumers when times are tough.

I take pride in our response to these cost of living pressures people are facing – and we have much more to come.

Just as when the pandemic hit, we showed the agility of Which? as an organisation, leaping into action to reach millions of people with practical money-saving advice via our website, social media, free email newsletters and in the press or on TV.

Our Ease the Squeeze hub is an invaluable resource for consumers; we have reached almost **7m** people directly with this free advice through our content and the media.

We are also using the convening power of Which? to push for policymakers and businesses to do all they can to help those who are struggling – from 10 Downing Street to FTSE boardrooms.

In a very turbulent year, we have shown how Which? continues to be the driving force behind so much positive change for consumers.

We've seen great results from our ongoing focus on making our advocacy work relevant to people's lives and ensuring consumers have protections fit for the digital age.

Which? led a coalition of organisations ranging from charities to big banks and successfully campaigned to get paid-for scam advertising, which is at the root of so many scams, included in a promised Online Safety Bill.

We also saw wins for long-running campaigns – with legislation to protect cash and allow for mandatory reimbursement of push payment fraud victims unveiled in the Queen's Speech.

Huge credit is due to teams across Which?, and of course our members and supporters, for working together to put these issues at the top of the agenda.

I have been greatly impressed by the adaptability and commitment of staff in our London and Cardiff offices as we have implemented hybrid working across both sites. We will continue to review and improve our employee experience and consider the long-term implications for Which? of a radically changed workplace environment.

Our diversity and inclusion work goes from strength to strength – with the expansion of our colleague networks, welcoming our first recruits from the 10,000 Black interns programme and the launch of the Which? Fund (see p33) among the highlights.

When it comes to sustainability, we have further expanded our Eco Buy endorsement, launched a Sustainability Hub packed with advice for consumers who want to save money and save the planet, and we're working towards becoming a net zero organisation.

In the past year we have also taken decisive steps to keep Which? on a firm financial footing and drive forward with our vital transformation work.

Rather than looking to scale back our ambitions to manage in difficult times and against tough competition, we recognise that our award-winning journalism, research and testing programmes and member services are even more important to consumers during a cost of living crisis.

That's why we believe now is potentially the time to call on some of the reserves we have built up over the years. Using these resources to support consumers now will pay dividends for us in the future.

Another area where we won't hit the pause button is our digital transformation work. Despite its challenges, this is vital to Which?'s ability to provide first-class digital services in the years to come.

This has been a year of huge challenges for Which? as a business and also for many of our members, supporters and all consumers. I believe we have the right strategy in place to show consumers that we are standing with them through this cost of living crisis as well as the right strategy to ensure our business emerges stronger in the years ahead.

The year ahead will again embody the purpose of Which?.

Despite the headwinds we face, I know we will continue to offer greater value to our members and show everyone in the UK the value of an independent UK consumer champion they can trust to fight their corner and make life simpler, fairer and safer for all consumers.

**Anabel Hoults**

# Council of Trustees' report incorporating strategic report

## Overview of the year

After two years of uncertainty as a result of the pandemic, the UK is now facing another huge challenge through the cost of living crisis. We know there are tough times ahead for consumers. We are pleased that our understanding of these needs has meant we've been able to quickly spot key areas of consumer harm and leap into action to provide trusted, useful, everyday advice.

Our new Ease the Squeeze hub has been a huge cross-organisational response, reaching almost **7m** people directly through our content and many more through the media and social media (read more on p16). Our ability to react to the current crisis – in much the same way as we responded to the pandemic – embodies our purpose and clearly demonstrates how we are providing trusted, relevant advice to consumers.

The cost of living crisis isn't the only harm consumers have been facing, and so we've been working hard to make consumers' lives safer, fairer and simpler in lots of other areas too. Our work on scams is a clear example of how we are continuing our focus on issues that directly impact consumers on a day-to-day basis. We were able to respond quickly to new scams such as the NHS Covid text scam, which became rife in April 2022 and tried to trick people into ordering Covid tests through a scam website. We warned subscribers through our scam alert service and added an article to our website informing people how to tell if a message is fake. Our work on getting paid-for advertising included in the promised Online Safety Bill could significantly reduce online scams (more on p18), demonstrating our long-term approach to consumer harm. We also saw mandatory reimbursement for Authorised Push Payment (APP) scams included in the Queen's Speech in May (read more on p23).

## Snapshot

We quickly responded to the cost of living crisis and have reached almost **7m** people through our content.

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Our campaigning helped ensure a promised Online Safety Bill should tackle online scams alongside other types of harm.

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We are funding research into areas of specific consumer harm experienced by diverse and disadvantaged communities.

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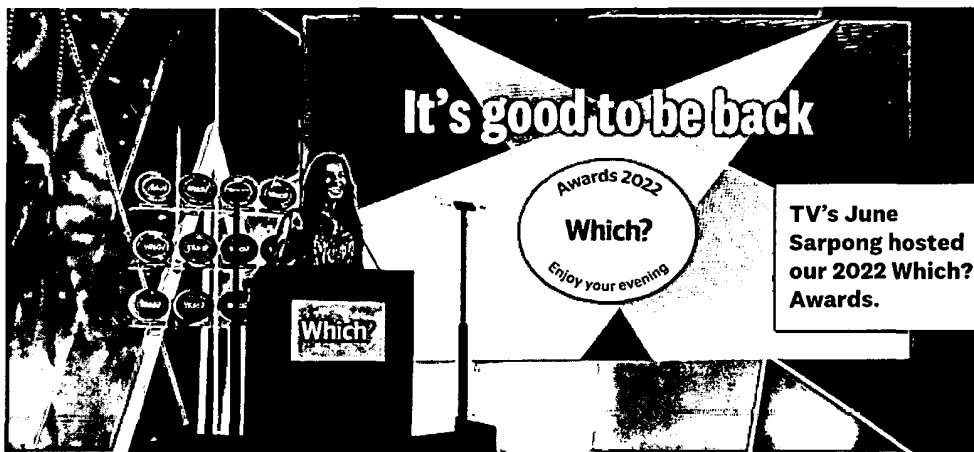
The cost of living crisis isn't just affecting UK consumers but is also putting pressure on our business, and is expected to continue to do so for some time to come, as we face increased supplier costs and a fall in our revenue from £88.9m in 2020/21 to **£86.7m** in 2021/22. The energy price increases have also resulted in a substantial fall in our switching service revenue, as competitive offers have all but disappeared. This shortfall results in a reduction in Group profit (before other comprehensive income/expenses) to **£2.4m** (2020/21: £4.9m), as most of Which?'s costs are relatively fixed to deliver the high-quality content our members expect, and Which? continues to support consumers more generally at this time of high need. Our ability to continue to deliver our revised three-year plan means we need to look at building the income we generate from our other commercial services, such as our endorsement scheme and retailer links. In 2022/23 we are planning to accelerate our investments to ensure we are able to continue to provide actionable advice to an ever wider group of consumers. As a result we are expecting to see a temporary reduction in the profitability of our trading business, which is therefore expected to fall short of the level of charity spend in year.

Like many other businesses, recruitment has been turbulent, and we have seen an increase in turnover which is both disruptive and time-consuming, however, we have recruited a number of high-quality colleagues into our technology teams – a notoriously competitive area currently – which demonstrates that Which? remains an attractive employer. Recruitment into this team helps with the delivery of our digital transformation programme, including our work on the introduction of the new Which? App and improvements to our website. Read more about this on p34.

## Diversity and inclusion

Diversity and inclusion both internally in how we work, and in how we support all UK consumers remains high on the agenda. We have a number of networks and colleague groups, such as our mosaic network and neurodiversity network, focused on ensuring all Which? colleagues have a voice. For consumers, we continue to look at content that appeals to a broad range of people and have launched our Which? Fund, to provide grants to other organisations to undertake research looking at specific areas of consumer harm experienced by diverse and disadvantaged communities. Read more about this on p33.





## Which? Awards

In May 2022, we hosted our first in-person Which? Awards since 2019. Restrictions due to the pandemic forced the Which? Awards online in recent years but in 2022 we were able to welcome more than **200** people from some of the UK's top brands to the event in London. The Awards provide Which? with an opportunity to engage with senior representatives from businesses ranging from Tesco Mobile to Samsung, Starling Bank to Jet2 holidays, as well as our valued Trusted Trader businesses.

## Sustainability

This year we launched a dedicated sustainability hub, bringing together in one place all our sustainability information and advice as we've continued to invest in this area. This has proved popular, with **3.59m** page views so far. We've also worked hard to align sustainability content with money saving advice as the cost of living crisis deepens. Following in-depth consumer research and a series of expert round tables, in October 2021 we produced a report "Supporting consumers in the transition to net zero" that informs

our policy approach going forwards. This includes calling on policymakers to improve the accessibility of the UK electric car charging network.

We have also expanded our Eco Buys accreditation, now endorsing more than 200 products. Internally we have achieved a carbon neutral accreditation. We are now looking at how Which? can plan for a path to net carbon zero emissions. We're also proud that our voice in this space is highly respected, as we were invited to speak on an expert panel at the 2021 COP26 event (read more on p30).

## Public benefit and section 172(1) statements

The Council of Trustees has a responsibility to follow the Charity Commission's public benefit guidance. The trustees are also bound by duties as charity trustees and under s172(1) of the Companies Act 2006 as company directors, in particular by their duty to promote the success of the Consumers' Association to achieve its charitable purposes. The trustees have discharged their duties, and in this report we demonstrate clearly how the Group's significant activities, and those of the Consumers' Association specifically, have contributed directly and indirectly to the delivery of the Consumers' Association's charitable purposes for public benefit. We also demonstrate how the trustees have discharged their s172(1) Companies Act duties and taken account of stakeholder interests (see page 40 for some specific commentary around our stakeholders' interests).

## Updated three-year plan

By 2025 Which? will be a leading brand for making consumers' lives better. We'll be making life simpler, fairer and safer for everyone by giving them trusted everyday advice when, where and how they need it. And we'll be standing up for consumers' rights, working with businesses and the government to protect consumers from harm while holding them to account if they don't. With more members, from all parts of society, our voice will be more powerful. We'll be more relevant to more consumers, a bigger part of their daily lives than ever before.

To enable us to achieve this vision we follow an internal goal-setting framework, which includes objectives that define the goals to be achieved, and measures progress towards the key results. This bridges the gap between our vision and the specific tasks needed to make it a reality, and allows us to break down annual goals into quarterly targets. For the next financial year, we've adapted our vision to respond to the changing consumer landscape. Our audience-led strategy will mean we are committing to:

- Using some of our reserves to support our long term growth over the three-year plan
- Investing in charity spend and expanding our expertise in tackling digital harms
- Investing in brand and proposition, and make it more relevant to support our commercial model
- Investing in ongoing fundamental technology re-platforming and digital transformation, so that we have the right technology to support us internally
- Revenue growth through modest subscriptions growth, continued diversification of commercial revenues and implementing sensible cost efficiencies.

## Looking ahead

In 2022/23 we will launch a refresh of our brand and proposition, with the aim of helping to make clearer what Which? does. It will also give us a more consistent, modern look and feel, helping increase our relevance with consumers. The refresh will help Which? appeal to a broader consumer audience. We hope consumers will have an improved recognition, confidence and affinity with us, enjoy journeys through our content that truly satisfy their needs and from a commercial perspective, we should see higher customer loyalty with deepened relationships.

The refresh will also strengthen awareness and understanding with our policy maker and business audiences, as well as refreshing our employer brand – helping to attract and retain talent as well as helping with employee engagement.

# Financial overview

Our parent charity, the Consumers' Association, has continued to allocate a high level of resources to delivering its charitable purposes, despite a challenging trading backdrop for the group's commercial business driven by the economic situation and post-pandemic consumer behaviour. Charity spend is in line with 2019/20 and only slightly down on 2020/21, when there was a high level of spend to raise the profile of online scam harms.

After charitable spend, and with non-trading income and costs, our net commercial activities generated **£1.8m** of profit. When combined with gains on the charity's investment portfolio, the portion of our office let out on commercial terms, and a very substantial gain on the revaluation of pension liabilities, there has been an increase in reserves in 2021/22 of **£10.6m to £70.2m**. The position on the pension fund has swung from a £9.6m net liability as at 30 June 2021 to a fully funded zero liability position at June 2022 due to the accounting requirement to adjust for the yield on corporate bonds, which had increased substantially as at 30 June. This means no pension liability is accounted for despite the agreed funding position with the Pension Trustees reflecting a significant gap in scheme funding. This balance is expected to continue to materially fluctuate over the coming years as it has in the recent past.

## Expenditure

Which? has continued to invest in technology both in terms of resources to improve the digital offering to meet consumer needs, and capital investment in a member subscription platform. When we restarted the investment in our digital platforms we made the decision to build from a new position, which has resulted in a £1.8m reduction in the value of some previous work, consisting of a **£1.0m** write-off in the year and an £0.8m disposal. As a result this expense accounts for much of the year on year increase in costs.

## Commercial income

Income from trading activities has decreased in year. This reflects a challenging economic situation with many consumers cutting back on subscriptions. Whilst there has been growth in endorsement and affiliate revenue, energy switching services have seen no activity due to the absence of a competitive market for energy. Reported income from trading activities of **£85.5m** includes the impact of the VAT change which has resulted in the zero rating of Which?'s digital subscriptions. As the clarity of the VAT position was only reached during 2021/22 the revenue for the year also includes a **£2.5m** back claim to HMRC for the period from May 2020 to June 2021. Since the VAT position was concluded in January 2022 there is also a **£1.5m** back claim for the period from 1 July 2021 to 31 January 2022, with these combined claims resulting in the increase in Accrued Income within Debtors compared to last year. The VAT relating to the prior years has been largely offset within revenue by a **£2.2m** provision to refund a cohort of members that the Group considers paid more than they needed to in the past.

In 2022/23 we will continue to build on the revenue increases outside of subscriptions we have delivered in 2021/22, with a focus on providing consumers with more endorsement recommendations, and increasing consumers' ability to complete their buying journeys through the Which? digital offerings. This is both from providing a wider range of switching services and allowing consumers to click straight through to even more partners.

We expect the consumer subscription market to continue to be tough in the year ahead, however, we plan to be able to maintain revenue from a combination of price increases and continuing to deliver insightful content to broadly maintain the volume of subscribers. As we deliver the new member subscription platform and increase consumer awareness of the benefit of the Which? subscription offerings, we expect to see growth in both subscriber numbers and the total revenue. Although promotional activity will need to reflect the wider economic environment to ensure it delivers the expected return.

## Charitable resources

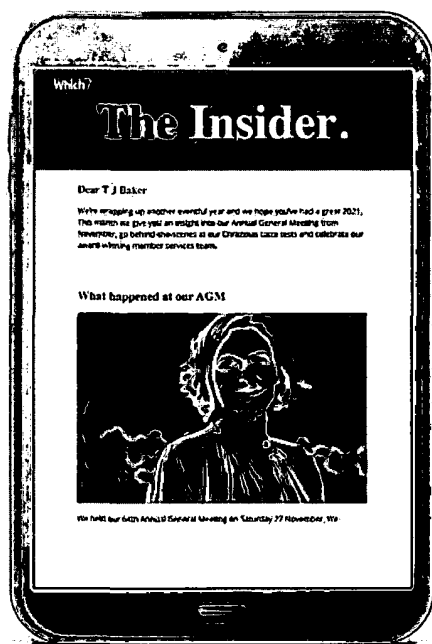
Our reported reserves position has significantly increased through both a trading surplus and the substantial reported reduction in the pension liability. The challenges to revenue combined with the investment in upgrading Which?'s digital capability, and the increase in costs from the high levels of inflation, means the gift aid Which? Limited is able to make to the charity is expected to reduce in the year ahead. Despite this, the charity is planning to maintain the level of charitable spend for the year ahead and call on its reserves if necessary to cover any shortfall.

# Membership

Members: **576,932**  
(2020/21 **612,805**)

We have had a challenging year when it comes to sustaining and growing our paying member base, which decreased from 612,805 members in 2020/21 to 576,932 members in 2021/22. After a steady first half to the year, much like other subscriptions-based businesses we saw declines in our total numbers, primarily due to members reviewing their outgoings in light of the cost of the living crisis. We are confident that our strategy to diversify our income through our commercial businesses and buying journeys has mitigated some of the revenue effects, and stands us in good stead for the future. While paying members declined, we saw substantial growth in sign ups to our free newsletters, helping us continue to reach consumers with information and advice (see p24).

We also continue to galvanise support from the public to help with our campaign activity and have increased our supporters number to **783,634** (2020/21 763,890). Our campaign supporters are a powerful force for good.



## Member events

Member events have been impacted by the uncertainty of the pandemic and we have had to look at ways of ensuring members still felt connected to Which?, while maintaining their safety. While still being mindful of this (and the possibility of changing restrictions) our member events in 2021/22 have remained virtual-only, through our 'Ask the expert events'. In April, we hosted an 'Ask the expert' event on scam safety. Hosted by senior consumer rights editor Adam French, the event included a panel discussion with a live Q&A, to provide attendees with actionable, practical advice on how to help protect themselves and their loved ones against scams. In May, our 'Ask the expert' event turned to the subject of cost of living and included experts such as Which? senior lawyer Lisa Webb and Jenny Ross, editor of Which? Money.

We also hosted our 2021 AGM in a fully virtual format. While we received great feedback from members who attended, we are aware that some members felt disappointed with the lack of an in-person option. Now the events landscape feels more certain, we are looking forward to providing a programme of virtual, in-person and hybrid member events in the future, including a hybrid AGM in 2022.

## Have Your Say

Our Have Your Say emails go to around **450,000** members and through these we have received more than **55,000** unique votes on product testing options, and more than **6,000** new product test suggestions in 2021/22. Some product tests that came directly from member feedback include; kitchen scissors, tin openers, car wash accessories, kitchen knives and reusable freezer bags. We have plans to expand our Facebook member groups to include Which? Conversation in 2022/23.

## Facebook members group

Our Facebook members group provides members with a place to share their own expertise and knowledge with each other, get advice on products and great deals from like-minded people. Members of the group also help inform our research. We have a thriving and active community of **9,300** members, which in 2021/22 has seen more than 1,200 posts gaining more than **24,000** comments.

## Connect Panel

Our Connect Panel is a key way we get feedback from members on what they would like to see when it comes to product tests. There are **38,000** Which? subscribers on the panel, with **81%** saying they think it's a great tool for keeping members involved in the work we do. It's a valuable way of engaging with our members.

## Advocacy quarterly

In our quarterly advocacy email, we update members on how we've been championing consumers, what we've been working on and the latest Which? investigations. Feedback from recipients tells us that **84%** liked or loved the email and **93%** of survey respondents said they agree that Which? is a leader in driving positive change for UK consumers.

## The Insider

Our regular Insider email, sent to around **4,500** of our **5,771** Ordinary Members (2020/21: 6,093) provides information on our latest articles, advice and governance. Just over **80%** of recipients find the information in these emails informative or very informative, and we receive lots of positive feedback.

# Impact report

This was a strong year for making positive change happen for consumers. As last year, we performed something of a balancing act – maintaining momentum in our longer-term journeys to tackle systemic problems and driving overdue reform of our consumer rights landscape, whilst also responding swiftly to more immediate, pressing needs.

We have grown our impact by ...

## 1. empowering consumers

### ... to make their money go further.

We expanded product advice to more everyday household items; added new affordability-based awards ('Great Value' and 'Cheapest Supermarket'); and developed a Cost of Living advice hub, new money-saving guides and podcasts full of tips to help "ease the squeeze". This helped consumers:

#### FIND WAYS TO SAVE

**c7m** consumers accessed our cost of living hub with nine out of ten surveyed afterwards rating our advice as helpful

#### SHOP WISELY

**c5m** purchasing decisions supported – with consumers telling us that our advice reduces their worry about choosing poorly or wasting money

#### GET BETTER DEALS

**7,900** consumers helped to get a better deal for their energy, broadband or mobile phone

*"saved a lot of money using Which? research ... invaluable in helping me to make quick, smart ... right choices!"*

### ... to prevent or tackle problems.

We grew our scams alert service and created a new scams Facebook group; helped consumers check they were buying wisely with new online checker tools, e.g. to check travel firms' approach to Covid; and improved our online redress claims tools. This helped consumers:

#### TAKE STEPS TO STAY SAFE

**87%** of scams alert recipients have used our advice to reduce their own or others' scam risk

#### FOIL SCAM ATTEMPTS

**c£1.2m** is the estimated value of scam losses avoided thanks to our scams alert advice

#### SOLVE THEIR PROBLEMS

**c52,000** consumer problems advised on, with 85% of callers surveyed afterwards saying we'd increased their confidence to tackle their problem

*"feel more informed (about scams) and more careful about what I respond to."*

### ... to reduce their carbon footprint.

We set up a second online hub and free newsletter on sustainable consumerism; expanded our Eco Buys; created new lifespan checker tools to help people factor longevity into their purchasing; and grew our electric vehicles advice. This helped consumers:

#### GROW THEIR AWARENESS

**3.2m** visits to our sustainability hub, with around eight out of ten surveyed after visiting saying they had found our information useful

#### RECOGNISE GREENER PRODUCTS

**77%** of consumers surveyed about our Eco Buy scheme said it had helped them learn more about greener product options

#### MAKE SUSTAINABLE CHOICES

**95%** of consumers interested in buying sustainably said our Eco Buy scheme had made their choice easier

*"used to help me replace ... with more eco-friendly and energy-efficient options."*

## 2. challenging and supporting businesses ...

### ... to advertise honestly and sell fairly.

We challenged unclear advertising of financial products; fake reviews; mis-selling of insurance; Covid test rip-offs; and mobile phone overcharging – resisting two attempts by Qualcomm to stop us holding them to account in a UK court. Our results include:

#### FEWER ONLINE FAKES

**c1,000** fake reviews, ads and websites, and scammer profiles taken offline by internet providers and online platforms

#### LEGAL CHALLENGE PROGRESS

**29m** could receive a pay out if we win our legal case against the tech giant Qualcomm

#### BETTER PRODUCT INFORMATION

28 major smart device brands made their security update policies public for the first time

*“The leading UK and perhaps global voice on fake reviews”*

### ... to keep consumers and their

**data safe.** Using our evidence, and through our “#Just Not Buying It” campaign we challenged online platforms to take more responsibility for harm on their sites from unsafe and insecure products and online scammers, with the following results:

#### FEWER UNSAFE PRODUCTS

**104** listings of unsafe products removed from online marketplaces, including CO alarms and diet pills

#### MORE SCAM PREVENTION

**5** major banks and delivery companies are making customer text messaging more secure in line with our best practice advice

#### MORE SECURE SMART PRODUCTS

**100,000** smart products already in people’s homes were made more secure when our testing drove companies to fix problems

*“Thanks for letting us know the security risks ... we have modified our apps”*

### ... to do the right thing when

**problems arise.** We challenged airlines over repeated failures to respect consumers’ rights over cancelled flights; and pressured banks for fair play in reimbursing scam victims – including by giving evidence in a precedent-making court case. Our successes include:

#### BUSINESSES HELD TO ACCOUNT

**c35,000** consumers helped via our revamped redress tools to make a claim for a refund or compensation when a business let them down

#### SCAM REIMBURSEMENTS

**c£1.9m** in reimbursement payments we helped scam victims secure this year

#### REDRESS PAYOUTS

**c£9m** estimated value of payouts we helped consumers claim from companies after a problem

*“Gave me confidence in my rights to make a claim”*

## 3. influencing policy makers ...

### ... to drive consumer-focused policy-

**making.** We ensured consumers were heard on cash protection, pensions reform, trade and EV charging

#### CONSUMER NEEDS UNDERSTOOD

**51** policy reports and consultation responses on issues including trade, scams, EV charging and cost of living support

#### CASH PROTECTED

**5m** consumers who still rely on cash for their everyday needs will benefit from the cash protections promised in the Financial Services Bill

#### EASIER PENSIONS MANAGEMENT

**1.6m** consumers who have lost track of their pensions will benefit from our work with government to simplify the pensions market

*“Really positive meeting with Which? on pension dashboards... and much more. My thanks for their continued focus on the consumer.”*  
(DWP)

### ... to improve protections and regulation.

We pressed for **travel reform** – of Civil Aviation Authority powers. We also worked with government on smart products regulation

#### REGULATOR ACTION

**8** regulator investigations or actions initiated against companies letting consumers down – including airlines and online platforms

#### SAFER SMART PRODUCTS MARKET

**c£100m** a year in cyber-crime costs could be tackled by a new law on insecure smart products that we helped shape

#### FAIR REDRESS FOR SCAM VICTIMS

**c£506m** was lost last year to bank transfer scams. A new mandatory reimbursement scheme promises fairer redress for victims

*“The evidence from Which? (on smart product security) was inordinately helpful.”*  
(DCMS)

### ... to update powers to tackle online

**harms.** We helped shape government plans for reform that should make it easier for regulators to tackle issues such as **fake reviews** and **online scams**

#### POWERS TO TACKLE FAKE REVIEWS

After pressure from us the government proposes to make fake reviews clearly illegal

#### SCAMS ACTION PROMISED

We helped ensure a promised Online Safety Bill should tackle the scam-ad fraud currently costing consumers **c£400m** a year

#### DIGITAL COMPETITION REFORM

We are helping to shape a promised draft Digital Competition and Consumer Bill that could deliver important new protections for consumers down the line

*“Thanks for your work on this. We’ve heard ... and these changes to the upcoming Online Safety bill will help stop fraudsters.”*  
(DCMS)

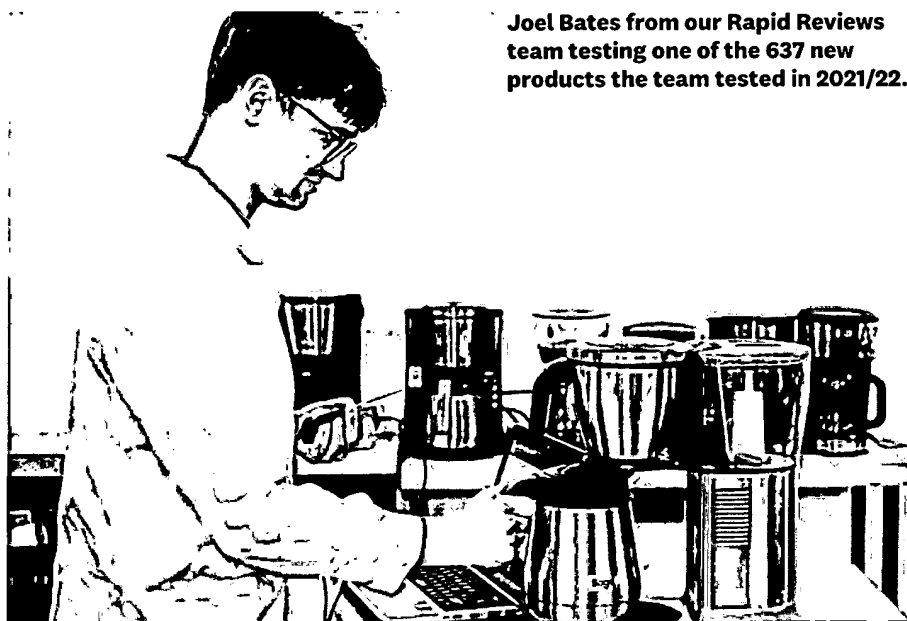
# Who we are

Which? is the UK's consumer champion. As an organisation, we're not-for-profit and all for protecting consumers – a powerful force for good, here to make life simpler, fairer and safer for everyone. We stand up for what's right for consumers, their experiences drive us to make things better.

Our parent charity, the Consumers' Association, is funded by our commercial subsidiaries. They generate income from membership subscriptions, but also from businesses who, if their products or services earn our endorsements can, for a fee, use our name to promote them. We're not influenced by third parties and we don't accept freebies from product manufacturers or retailers.

We stand up for what's right for consumers, their experiences drive us to make things better. Our research gets to the heart of the consumer issues that matter, and our expert advice is completely impartial. The same goes for our product reviews – our rigorous tests and expert recommendations help consumers to make better decisions. We investigate and make change happen – from tackling online scams to campaigning for safer products, we're the independent consumer voice that influences and works with politicians and lawmakers and works with businesses and holds them to account.

Everything we do is about championing consumers. We'll always be on their side, fighting their corner and working to make them more powerful.



**Joel Bates from our Rapid Reviews team testing one of the 637 new products the team tested in 2021/22.**

## Charitable purposes

The charitable purposes of the Consumers' Association are set out in the Articles of Association, which is the charity's governing document.

The charity's purposes are:

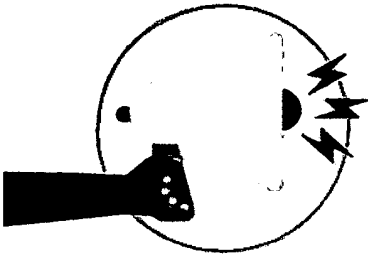
- (i) undertaking, promoting and disseminating impartial, scientific and/or evidence-based analysis of or research into:
  - (a) the standards of goods and services available to the public as consumers; and
  - (b) ways in which the quality, safety and availability of such goods and services may be maintained and improved;
- (ii) promoting and improving knowledge and understanding of:
  - (a) laws, regulations, public policies and business practices so as to empower consumers in their everyday lives;
  - (b) any aspect of public health and in the principles of physical and mental health; and
  - (c) life skills including those relating to personal finance, digital and technology, horticulture and the home;
    - to uphold and promote compliance with consumer laws, regulations and public policies, in particular through the exercise of the Association's statutory powers for the benefit or protection of the rights of consumers;
    - to protect and promote the safety of consumers;
    - and to promote the interests of consumers who are restricted from accessing or using goods, services or data because of their youth, age, ill-health, disability, financial hardship or other disadvantage.

# Our impact areas

We tackle consumer harm by making life simpler, fairer and safer for everyone. Our purpose has never been more important. It guides everything we do.

We focus our support for consumers in four main areas: consumer rights, digital life, scams and money. These areas have been carefully selected based on both where there is the current (and future) consumer harm and where we have the experience, expertise and ability to have the most positive impact.

This structure guides Which? in our work for consumers while giving us scope to be flexible in what we choose to focus on depending on changing consumer needs. Many of the challenges facing consumers cut across our impact areas, from consumers' rights to the rise in scams – read more about our efforts on the following pages.



**Consumer rights** We use our tests, investigations, helplines, policy insight and legal expertise to identify practices that are unsafe or unfair on consumers.

We push to re-shape the policy landscape so that consumers are well protected in a post-Brexit UK.



**Digital life** We are a go-to source of advice on data protection and security.

We push for more responsible use of technology, safer smart appliances, wider access to good connectivity and fairer digital markets.

We fight against digital exclusion and for the right protection of digital users.



**Scams** We help consumers stay ahead of the scammers.

We call out new scams and show consumers how to spot them and avoid them.



**Money** We influence businesses, and challenge and support policy makers, to do more to help consumers make informed choices around money.

We campaign for fairer markets, where financial products and services are transparent and easy to understand.

We campaign for better protection from scams and for redress for the victims of scams.

# Consumer rights

## Addressing the cost of living crisis ...

Many consumers faced financial hardship during the pandemic and unfortunately there has been no respite as the cost of living soars and consumers are hit with another crisis. People have been squeezed from all angles, from energy bills doubling to food prices pushing more and more people to food banks. As businesses have also been affected by price rises, these costs are being passed on to the consumer, with everything from home improvements to car hire becoming less affordable. In January 2022, Which? was quickly able to provide helpful advice and information as the crisis loomed. Here is a short overview of what we've been working on.

### ... Through our content and advice

In January 2022, we launched our Ease the Squeeze hub on our website as an easy way for all consumers – whether members or not – to find all of our expert content on how to save money during the cost of living crisis. Helpful tips and advice through web content, podcasts and tools have proved incredibly popular, with content reaching almost **7m** people through our website and wider media work. Our Money-Saving Monday content has proved popular in the media, with topics ranging from saving on travel to home improvements being featured on

## Snapshot

Which? responded to the looming cost of living crisis by launching our Ease the Squeeze hub on the website – which reached almost **7m** since launching and **91%** of visitors told us they found the information useful.

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As travel woes continued, Which? provided advice across national and regional media and called for reforms to protections and regulator powers.

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We fought for a stronger focus on consumer interests in trade deals from food standards to data protection – and the UK-New Zealand deal includes a precedent-setting inclusion of consumer protections.

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the likes of the *Telegraph*, *Daily Mail*, *Mirror* and *Daily Express*.

Articles such as '8 things you should know about budget groceries' and 'New budget supermarket launches' received more than **36,000** and **10,545** views respectively, as well as driving sign-ups to our free Money newsletter that allows us to continue to deliver free, trusted advice direct to consumers' inboxes. We also launched a successful Ease the Squeeze podcast mini-series, gaining **60,000** listens, with our energy topic proving the most popular.

We analysed the prices of more than **21,000** groceries and crunched more than **1.9m** data points to understand what is happening to food prices. As well as being the cover story for our June issue of *Which? magazine*, the story was also picked up by major media outlets and appeared on BBC You and Yours and Sky News, and our online story featured on Apple News, receiving over **300,000** views.

### ... Through our reviews

The Rapid Reviews part of the Product Testing team reviewed **637** new products in 2021/22 across **81** separate product categories. The vast majority of these were everyday product purchases costing under £100. Also in 2021/22, we invested more resources in our taste test content. This saw us increase the number of everyday food

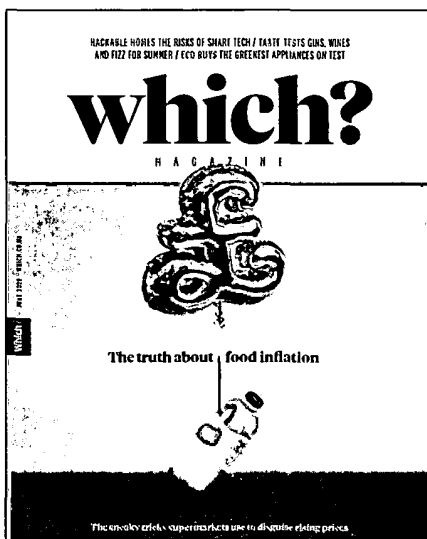
and drinks that we reviewed by **40%**, with new reviews including the best brand of peanut butter and the best instant coffee, with some of these tests finding supermarket own-brand options beat better known brands, helping consumers keep costs down on their favourite products.

### ... Through our endorsements

While Which? has always compared the price of a shop across the major supermarkets, we increased our focus on this type of content to help consumers save as much money as possible on their weekly shop. We also introduced a 'Great Value' and 'Cheapest Supermarket' endorsement logo, which helps visitors to Which? content quickly identify where savings can be made. Monthly cheapest supermarket news and advice stories have seen **640,051** unique visits (2020/21: 484,152) and our free newsletter had **1,173** sign-ups.

### ... In the corridors of power

In addition to providing consumers with helpful cost of living advice, we discussed with policy makers areas where we feel the government could act quickly, at little cost to the public purse. We called for change in areas such as: the amount of VAT paid on telecoms and where consumers face exit fees when switching to cheaper deals in energy







We added more affordable recommendations to **72** product categories online to help people find cheaper options

We used the Great Value endorsement across **13** product categories in the main *Which?* magazine and identified **84** Great Value products on *which.co.uk*

and telecommunications. We published an opinion piece on all our calls on the Conservative Home website.

### Travel chaos continues

The holidaymaker misery that reigned throughout the pandemic has continued into 2022, with staff shortages continuing to have an impact on travel and some firms hit by strike action. We provided ongoing advice through our website and were busy in the media, lending our voice on the situation. In fact, between April and June we secured **850** pieces of coverage (the equivalent period in 2020/21: 780 – demonstrating how this subject remained consistently popular for news outlets) in regional and national media with our advice and commentary on the situation.

Travel Editor Rory Boland was our top spokesperson of 2021/22, appearing in the media **934** times, demonstrating how disruptive the chaos has been. To help people feel more confident when booking, we launched a tool on our website that allows people to see which holiday providers have the best Covid policies and in which scenarios those firms are likely to provide full refunds. We also gave evidence in Parliament on the impact on consumers and are campaigning for stronger protections, including mandatory Alternative

Dispute Resolution in the sector and stronger powers for the Civil Aviation Authority (CAA) to hold businesses to account.

### Consumer and competition reform

The UK's consumer and competition regimes are no longer fit for purpose to deal with the problems consumers face in today's markets – and as they increasingly rely on digital markets. It is more important now than ever, as people deal with the cost of living crisis, that they have confidence that there are robust protections that they can fall back on when they need them – and that regulators are able to ensure businesses behave responsibly.

We saw during the Covid pandemic that even where consumer protections were in place – including requiring refunds for cancelled events and holidays for example – it was often very difficult for people to enforce their rights. Which? has long called for a modernisation of consumer and competition law and had a big success when the government announced a draft digital markets, competition and consumers bill in the Queen's Speech.

### Trade talks

We continued to provide a consumer voice on trade talks as these continue in a post-Brexit UK, including sitting on the government's Strategic Trade Advisory Group. A number of trade deals were under negotiation in 2021/22 and Which? analysed each to see what benefits – or issues – these could bring for consumers, drawing on our extensive public dialogues asking people about their priorities. We also surveyed more than **3,000** UK adults to find out how the public feels about post-Brexit trade negotiations and what consumers want to see prioritised in future trade deals. The survey showed strong public support for a consumer chapter in trade deals – with eight out of 10 (**81%**) respondents agreeing there should be a section within trade deals supporting consumer interests. This was secured in the trade deal with New Zealand. We also fought to ensure that people's other priorities – including maintaining food standards and data protection – were upheld by the government within the text of the deals, as well as going forward, for example, in the case of the deal signed with Australia.

### Looking ahead

With inflation predicted to carry on rising in 2022/23, Which? will continue to campaign and keep up the pressure on business and government to do more to support consumers throughout 2022/23 as well as continuing with our helpful money saving advice through our Ease the Squeeze hub.

When it comes to consumer and competition reform, a big, longer-term issue that the government needs to address is to provide the Competition and Market Authority with effective powers to enforce consumer law and the Digital Market Unit with the powers to implement pro-competitive codes of conduct in digital markets dominated by the 'Big Tech'. We will therefore focus on ensuring that legislation that will bring these into effect is taken forward.

# Digital life

## Snapshot

A significant win for Which? this year was the inclusion of fraudulent paid-for advertising – one of the most popular methods criminals use to scam consumers – within the government’s proposed Online Safety Bill.

Our research showed how vulnerable some smart products are to hacking, and so Which? called on the government to set out minimum periods of time during which smart products must receive vital security support.

In May 2022, the Competition Appeal Tribunal gave the go-ahead for the claim against Qualcomm to proceed to trial and agreed that Which? is the appropriate representative for the millions of UK consumers affected.

## Online Safety Bill: a timeline

The government’s announcement to include scam ads as part of the Online Safety Bill was a major win in our fight against online scams. Here is a timeline of how we got there and what comes next.

**May 2021** The government announced measures to tackle user-generated fraud would be included in the Online Safety Bill, giving online companies responsibility for tackling scam content such as posts on social media. This followed a public appeal led by Which? and including a coalition of **17** third-sector organisations, industry bodies, law enforcement and regulators to urge the Government to include fraud within scope of the Bill.

**18 October 2021** Director of Policy and Advocacy, Rocio Concha, gave evidence to the Joint Parliamentary Scrutiny Committee making the case for paid-for scam advertising to be brought within the scope of the Bill.

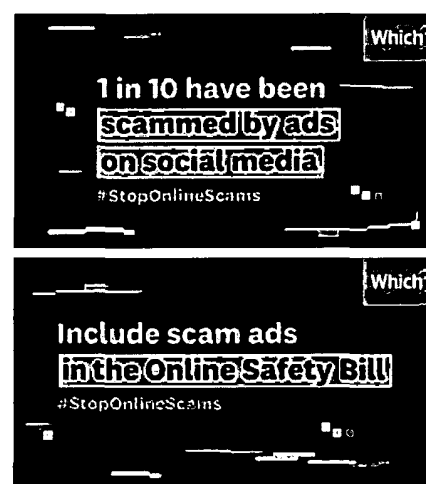
**14 December 2021** The Joint Scrutiny Committee on the draft Online Safety Bill published its report recommending paid-for advertising be included in the Bill.

**21 February 2022** Which? organised a week of activity to put pressure on the then Secretary of State for Digital, Culture, Media and Sport Nadine Dorries, to bring paid-for scam advertising within the scope of the Online Safety Bill. This included creating a video featuring supportive

voices from Parliament, industry and the third sector, including scam victims, urging Ms Dorries to amend the Bill. In addition to promoting the video via our social media channels, we played it on a digivan – as it took a visit to the roads surrounding Parliament. To coincide with this, thousands of our campaign supporters responded to our call to action, sending postcards directly to Ms Dorries, appealing to her to change the Bill, and we published new research highlighting the scale and impact of online scam ads.

**8 March 2022** The government announced that the Online Safety Bill would include a duty for online platforms to tackle fraudulent advertising, with Ms Dorries acknowledging Which?’s campaigning efforts on social media.

**26 May 2022** Rocio Concha was invited to give evidence to the Public Bill Committee for the Online Safety Bill, and made the case for search engines to be given the same stringent duties as social media sites to prevent fraudulent advertising from appearing on their sites.



**9 June 2022** The government announced it would be amending the Bill to ensure both search engines and social media sites are required to prevent scam ads from being posted to their sites.

## Next steps in the Online Safety Bill

Although Parliamentary proceedings for the Bill were paused until the appointment of a new Prime Minister, we will continue working with DCMS and Parliament to ensure the Online Safety Bill includes the right duties for search engines and social media networks to protect consumers from fraudulent paid-for advertising.



of them among eligible customers – with just 1.2% of households receiving Universal Credit taking advantage of social tariffs. We will continue to urge providers to consider what further support they may be able to offer their customers.

### Qualcomm update

In last year's Annual Report, we reported that Which? had filed a claim on behalf of 29m UK consumers that, if successful, could see them receive a collective **£480m** payout. This is because we believe Qualcomm, a global manufacturer of chipsets which enable smartphones to connect to 4G networks, has abused its position as a dominant company charging smartphone manufacturers, such as Apple and Samsung, inflated fees to use its technology, increasing their costs which in turn led to us paying higher prices for our phones.

We're pleased to report that in May 2022, the Competition Appeal Tribunal gave the go-ahead for the claim to proceed to trial and agreed Which? is able to act as the representative for the millions of UK consumers affected. We are now looking at a timetable for next steps in the claim (which will be set by the Tribunal) and as soon as the date for trial is set, the claim website ([www.smartphoneclaim.co.uk](http://www.smartphoneclaim.co.uk)) will be updated with further information. This particular action is a great example of why it's so important to have an organisation like Which? that can be a focal point on behalf of consumers, and claim the redress they are entitled to.

### Smart products

We continued our work on smart products and the security risks these can pose. UK households now have more than 10 different connected devices on average, from televisions to thermostats. While these products can bring huge benefits and convenience for consumers, as homes become more connected they can become more of a potential target for hackers.

Poor security on popular smart devices which are likely no longer supported by technology firms including Amazon and Google can be exploited by hackers and used to crash websites, steal data, snoop on homeowners, or even for intimidation by domestic abusers. Some of these products had been abandoned by the manufacturer within five years of launch.

When we set up a fake home and filled it with connected products bought from online marketplaces, ranging from smart TVs, printers and wireless security cameras, we found that in the busiest week there were **2,435** specific attempts to maliciously log into the devices with a weak default username and password.

Which? called on the government to set out minimum periods of time for which smart products must receive vital security support. They have been using our research to influence the passage of the Product Security and Telecommunications Infrastructure Bill, which is a world-first primary legislation for smart product security. When this becomes law, brands will have to state update support periods at point of sale.

We received a substantial amount of mentions for our work as the Bill has passed through the Commons and Lords, including a lot of praise for our campaigning, including from then Minister of State, Julia Lopez MP.

### Access to quality broadband

Access to good-quality connectivity is essential for consumers. The issue of telecoms affordability has come into sharper focus as a result of the cost of living crisis, coupled with above-inflation price increases introduced by some of the largest providers. It is critical that providers do the right thing to support their customers, particularly those on low incomes. We welcomed the provision of social tariffs to help those customers who are in receipt of certain benefits, such as Universal Credit. Yet, it is clear that more must be done to raise awareness

### Looking ahead

The Data Protection and Digital Information Bill will continue to be an important area for Which? to champion consumer rights, and alongside stakeholders this summer we will further prioritise Which?'s advocacy work in this area. The change of threshold for requests by data subjects, the proposed ICO reforms, the definition of personal data and that collective redress and enforcement are omitted from the bill are key areas where consumers' rights are being eroded from the previous GDPR legislation. Elsewhere, we will continue working with parliamentarians and the government departments to ensure the Online Safety Bill includes the right duties on major search engines and social media sites to protect consumers from online scams, while also shifting focus to DCMS' Online Advertising Programme, to ensure it effectively tackles scam advertising on smaller but equally high-risk websites that fall outside the Online Safety Bill's scope.

# Scams

## The rise of scams

It's an unfortunate reality that scammers see a crisis as a perfect opportunity to exploit people into handing over their cash.

### Energy scams

In the first quarter of 2022, figures from Action Fraud obtained by Which? showed scams mentioning one of the Big Six energy firms had risen **10%** when compared to the same period last year. January alone saw a **27%** year on year increase. One of the most common methods Which? has seen used by scammers is phishing emails, in which a scammer posing as an energy supplier emails the customer inviting them to claim a refund, due to a miscalculation on their energy bill.

For those proactively looking to reduce energy bills via green home improvements, there have been a number of government grants rolled out in the past few years to incentivise purchases including insulation, heat pumps and more. Fraudsters are also taking advantage of these various government grants by impersonating legitimate schemes online, via cold calling and even on the doorstep.

### Covid scams continue

Anxious and vulnerable people are often the targets of scammers, and as a result we saw a rise in scams relating to the pandemic – such as fake NHS texts asking people to hand over money for fake tests or travel passes. We were quickly able to get information out to subscribers of our scam alert service to warn them of such tactics.

### Romance scams

Romance fraud has also boomed in recent years as more people turned to online dating during the UK's lockdowns. Losses to romance fraud reached **£73.9m** during this period, with Action Fraud receiving **7,754** reports. The true figure is likely to be much higher, as many victims of romance fraud are too embarrassed or upset to tell the authorities.

## Snapshot

We continued our focus on scams, with Which? research showing scam victims in the UK suffer an impact to their wellbeing that can be calculated at **£9.3b** a year.

Our scam alert service continued to provide useful information to consumers, with more than **350,000** people now signed up.

We received almost **25,000** reports to our scams sharer tool.

## Empowering consumers against scams

We are putting power back into the hands of consumers, by sharing information on how to spot scams, as well as collecting reports on scams through our sharer tool. We also encouraged businesses to ensure their communications are easily distinguishable from scams by providing a guide.

### Scam alert service

In 2020, we launched Which? Scam Alerts, a free-to-use service that warns people of the latest scams doing the rounds, and provides practical advice to keep consumers one step ahead of fraudsters. In 2021/22 we increased our subscribers to this useful service to **353,892** (2020/21: **305,408**).

We also mailed **230,000** people who support our Stamp out Scams campaign (some have been with us since its launch in 2015) with the news

of the Confirmation of Payee roll out, which saw banks introduce a new way of checking account details to give customers and businesses greater assurance that they are sending payments to the intended.

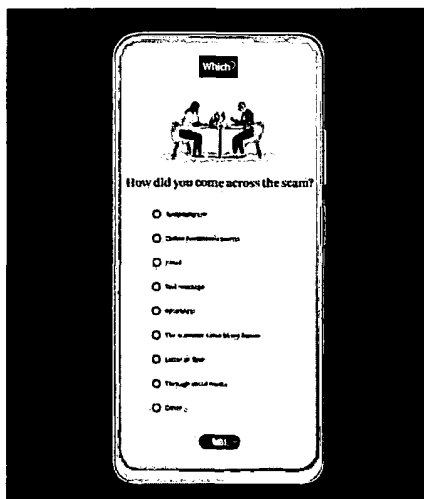
### Scam sharer tool

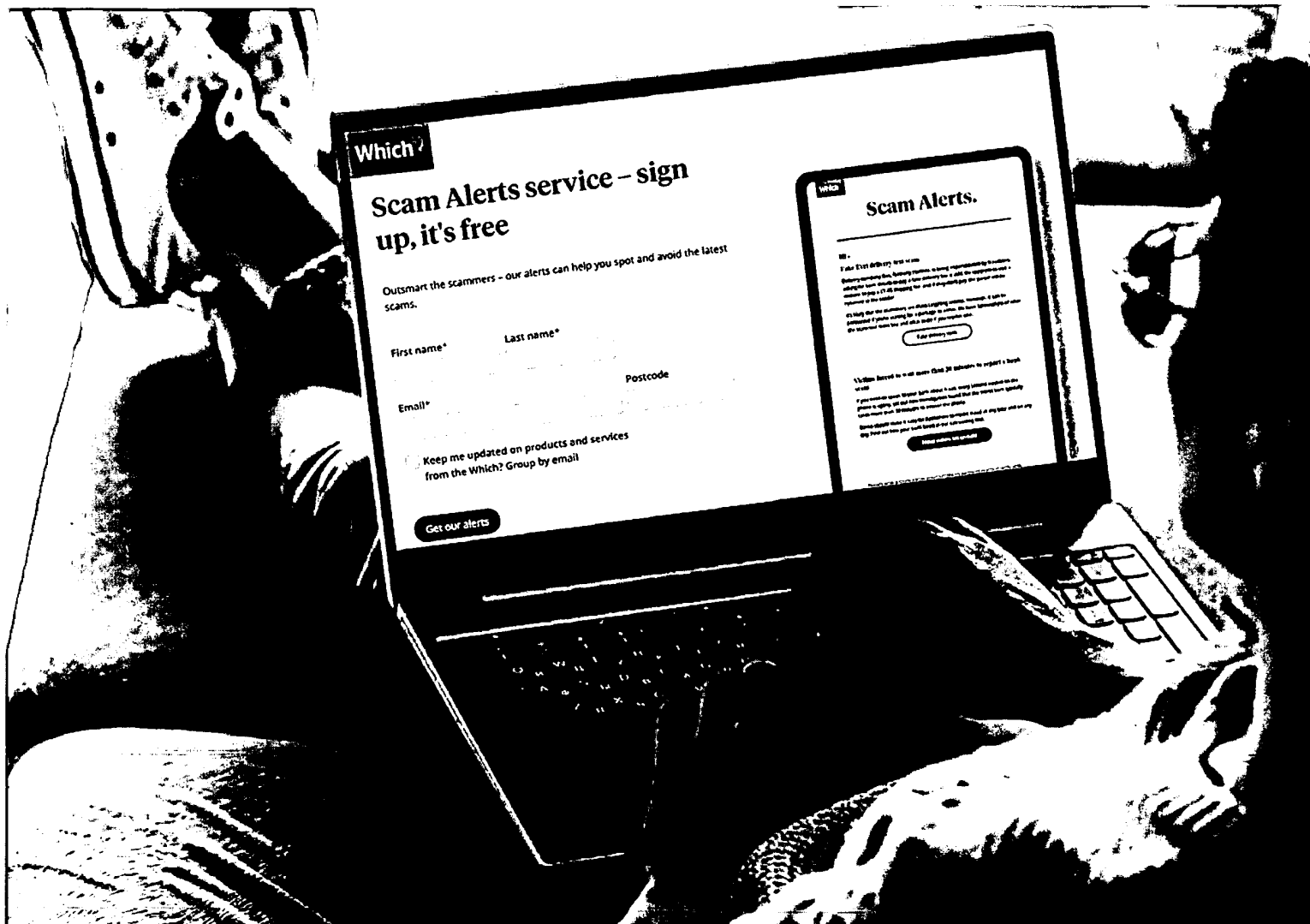
In 2021/22 we received almost **25,000** reports to our scams sharer tool (March 2021–July 2021: **1,600**), with the number one scam source being reported coming via SMS (**11,021** reports), closely followed by emails (**10,743**).

### SMS best practice guide

In September 2021, we published our best-practice guide for businesses on SMS communications. Over the pandemic, we saw a significant increase in 'smishing' scams – in other words, text message-based scams. Proofpoint data showed that reports of smishing in the UK grew nearly **700%** in the first six months of 2021 compared to the previous six months. There has also been growth in businesses using SMS to reach their customers, but our research showed that seven in 10 people say they don't trust text messages from companies to be free from scam risks.

It is vital that businesses distinguish their legitimate messages from scams and help consumers spot the difference, so we developed a best-practice guide to help businesses do this. The initiative had support from nine key organisations and a number of businesses have made positive changes to their SMS practices using our guide as a blueprint.





### Case study – Jonny Yeoman

Jonny Yeoman, a 27-year-old musician and music teacher from London, was conned out of £2,500 after being tricked into paying a deposit to a fake landlord to secure a rental property in 2018. He saw a Clapham property advertised on Gumtree with a link to SpareRoom, and received a message from someone he thought was the landlord. The scammer then convinced him to set up a viewing at the property with legitimate estate agents, but warned

that the estate agents wanted to sell the flat rather than let it out short term. After viewing the flat, Jonny checked the Land Registry to verify the property's landlord and decided to put down a deposit. However, when he tried to move in, the real landlord's daughter answered the door and said they had no knowledge of the rental agreement and realised the landlord's email was fake. It was at this point that Jonny reported his case and he was able to recover most of the money he lost, but was not able to see all of it returned. Jonny said:

*"I think it's important to speak out about this scam as in London there are thousands of people looking to move. Being aware of the signs of a rental scam is extremely important! I wish I'd known more when I was in the process of looking for a place to live. It's easy to be blinded by what the place looks like or its location etc. If it looks too good to be true, challenge it and be extremely careful before making the next move."*

*"The feeling of losing a lot of money is one thing, but the feeling of being 'taken for a ride' and tricked was worse. Knowing that you had contact with someone who wasn't who they said they were and being told multiple lies was horrible! Luckily for my flatmate and I, we had great landlords from our previous places who were happy for us to return until we sorted ourselves out."*

### Looking ahead

In 2022/23, Which? will continue its work to help ensure that consumers are better protected from scams and that they have the support they need to keep themselves safe from scams. We will look at the technologies that enable scams and seek to ensure that telecoms and other technologies are less able to be exploited by scammers. We also plan to leverage our scams data, as well as that from other organisations, to ensure that Which? provides effective, tailored advice to consumers.

# Money

## Snapshot

Legislation to protect access to cash was included in the Queen's speech, a win for consumers following a long campaign from Which?.

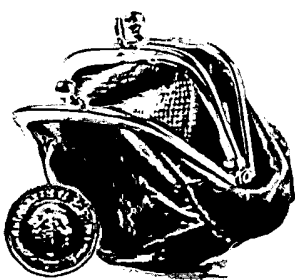
Which? campaigning helped towards the inclusion of a mandatory system of reimbursement for victims of APP fraud being included in the Queen's Speech.

With our research showing the proliferation of Buy Now, Pay Later services, Which? continued to campaign for vital affordability checks for consumers to protect them from unmanageable debt.

## Access to cash – a timeline

Following a long campaign by Which? to ensure access to cash in the UK is effectively protected, plans are now underway to protect cash with the government's commitment to new legislation. Here is a timeline on how we got there.

**October 2020** We were invited to give a private briefing to the Public Accounts Committee on our insights on cash and views on the National Audit Office's report in October to inform their recommendations.

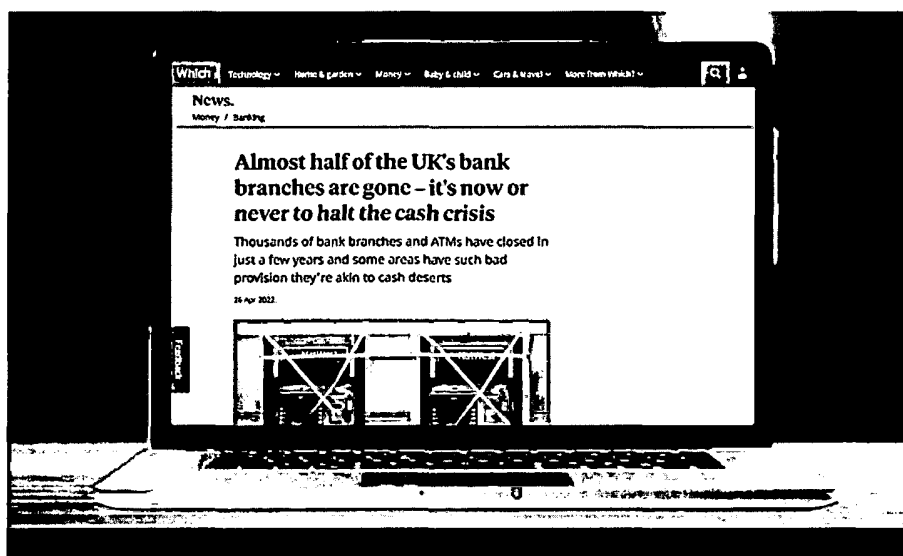


**May 2021** We launched our Cash Friendly Pledge, which saw

**200** businesses signed up to accept cash in stores, including major supermarkets and pharmacies.

Also in May 2021, we held our Cash Summit, a virtual event to which we invited major figures from the payments industry.

**September 2021** Which? responded to a HM Treasury consultation on access to cash.



**December 2021** A voluntary agreement was launched by banks to protect access to cash.

**January 2022** Our Head of External Affairs gave oral evidence to the Scottish Affairs Committee on Access to Cash in Scotland.



**April 2022** Keeping up the pressure on policy makers, Which? published research that almost half of bank branches have closed since 2015, and identifies a series of cash "deserts".



**May 2022**

Legislation to protect access to cash was included in the Queen's speech, a win for consumers following a long campaign from Which?.



### Case study – Helen Miller

We often hear from real people about the impact a lack of access to cash has on their everyday lives. In our May *Money Magazine*, we spoke to Helen from Barry, South Wales, who finds many of her local shops and restaurants don't accept cards, and so access to physical cash is still vital. She told us:

*"I had to borrow cash from my stepdaughter as a café didn't take cards and neither my husband or I had any cash on us. I also had a large cheque to pay in, which couldn't be done digitally."*

A wheelchair user as a result of a physical disability, every trip outdoors involves a good deal of stress, worry and planning for former midwife Helen. Recently she planned a trip to her local branch of HSBC, but when she got there, she was shocked to find it had closed for good three months beforehand. She said:

*"Going to the bank is a big trip for me, so it was really frustrating when I'd checked the opening times on the website, then went to the branch only to find it wasn't there any more! I don't like using cash machines as I can't hide my PIN. I often can't reach the machine and feel vulnerable as I'm too far away to get the cash out. Plus the closest ATM to where I live isn't wheelchair-accessible."*

### APP scams

Authorised push payment (APP) scam losses increased by **46%** in 2021, topping **£506m** for consumers. APP scams happen when a person or business is tricked into sending money to a fraudster posing as a genuine payee. Since our super-complaint to the Payment Systems Regulator in 2016, we saw some improvements in the way that banks and other payment providers prevent fraud and treat victims. But a voluntary reimbursement code that was launched in 2019 failed to deliver fair and consistent outcomes. Victims continued to shoulder the majority (**51%**) of the losses to APP scams in 2021.

In the Queen's Speech, the government committed to laying the foundations for a mandatory system

of reimbursement for victims of APP fraud. This was a major win that could have a huge impact for victims. It can also help to prevent fraud by ensuring that the liability for losses falls fairly on those best able to prevent fraud from happening.

### Buy now, pay later

In our 2020/21 Annual Report, we talked about the rise of Buy Now, Pay Later and our concerns about the lack of regulation these payment schemes face. The option to buy now, pay later was still relatively novel. However, a year later we have seen the proliferation of the payment option across many major retail websites, and even banks creating their own options. The value of transactions processed using BNPL has grown with

### Looking ahead

We have long campaigned for the government to bring consumers' pensions information together in one place to make saving and retirement easier. The government will require pension schemes to begin providing information to new, online pensions dashboards from April 2023. In 2022/23 we'll be stepping up our pressure on the pensions industry to meet these requirements without any further delays and on the Financial Conduct Authority to introduce robust regulation of pension dashboard providers.

As well as ensuring that the government protects access to cash so that the **5.4m** adults that rely on cash to a great extent are not abandoned, we will also kick off research to better understand the barriers to consumers embracing digital payments.

Although the government has announced its plan to regulate the BNPL market, we are calling on it to move more quickly. Currently, new rules to protect shoppers are unlikely to take effect until 2023 at the earliest. But as the debt bubble supposedly surpasses **£4bn** in the UK and with the cost of living soaring, Which? believes it's vital that appropriate affordability checks are needed to help prevent people from amassing debts that they may struggle to pay off.

a third of UK consumers reporting to have used it.

Which? research found that people are often using these schemes without realising that they're taking on debt – instead referring to the schemes as a 'way to pay' or a 'money management tool'. Our earlier research also found that missing a credit repayment or bill or experiencing a major life event – such as getting married, having a baby, moving home or being made redundant – increases the odds of using BNPL by around a third (**38%** and **35%**, respectively).

# Our expert advice and content

## Expanding our free newsletters

We expanded our free content in the areas consumers tell us they really care about – this resulted in **750,000** additional newsletter subscribers in 2021/22. Our scam alerts newsletter went from strength to strength and we finished the year with **350,000** subscribers (2020/21: **305,000**).

You can read more about this on p20.

In support of our strategic goal to be more relevant to more UK consumers we extended some previously member-only newsletters making them available for free, to all (Weekly Scoop, Gardening, Sustainability and Travel), and built on the success of the existing Money and Scam Alert newsletters, to also launch regular Cars, Food and Health, and Home and Tech bulletins. We ended the year with **265,000** sign-ups, with steady growth across the year as we improved sign-up journeys and newsletter promotion – a fantastic achievement. We also promoted the newsletters to members, and were delighted that **144,000** members signed up during 2021/22. Engagement with our newsletter content was consistently strong through the year and we also saw around **7,000** subscription sales from this audience, which we are looking to build upon in 2022/23.

We can see that the free newsletters are helping us to reach a broader audience, with **57.5%** of non-members who signed up being in the £0–40,000 income band (compared with around **41%** of members who have signed up to newsletters).

## Providing a range of ways to access our content

We've been working hard to ensure members and consumers have a multitude of ways to access Which?'s trusted, everyday advice. As well as our online, print and app content, we focused on our audio and video content to make Which? more accessible than ever. It's also a great

## Snapshot

To give our audiences more ways to access our helpful, everyday advice, we've looked at the different ways we can present our content. The expansion of podcasts and video content has proved popular, reaching millions of listeners and viewers.

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Our free newsletters have gained **750,000** new subscribers in 2021/22, driving even more people to our free helpful advice and expert content in areas from scams to sustainability.

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As well as expanding the ways in which members and consumers can view our content, we've been working hard to improve the platforms on which they consume our advice.

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Transforming our digital platforms will lead to improved user journeys where people can find the information they're looking for more easily.

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recognition of our efforts that the video and audio team were nominated for four awards in 2022, with three nominations for our podcasts and one win for 'Best video team' at the BSME Talent Awards, which recognised our focus on useful everyday advice that is still highly engaging to watch.

An ever-growing audience is now listening to our podcast content, with **81** episodes published in 2021/22. The weekly Which? Money Podcast passed **1.35m** all-time downloads, with **572,688** in 2021/22 alone (2020/21: **451,182**). We also launched a takeover of the Money Podcast with a special



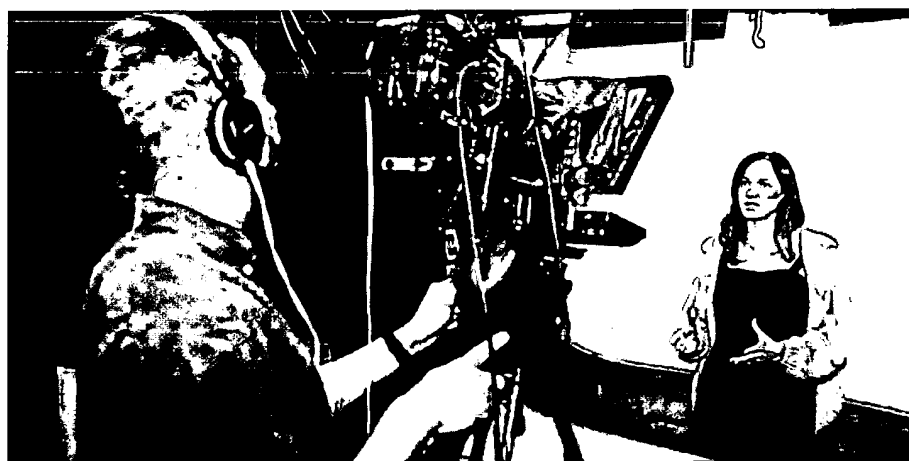


Our video and audio teams work to bring our consumer stories and advice to life. (Above: Rob Lilley and Lucia Ariano. Below: Josh Reeves and Grace Forell).

In 2021/22 we created **109** video projects, published **200** times across all channels, resulting in **7.4m** views.

Ease the Squeeze podcast mini-series, which saw **60,000** listens across six episodes. Our flagship Which? Investigates podcast, launched in June 2021 with a two season pilot, saw **125,000** downloads across 16 full episodes. Our newest weekly podcast, Which? Shorts, which repurposes magazine articles from across our magazine titles, saw steady growth with over **20,000** listens since it launched in April 2022.

We adjusted the way we approach video projects, with the team identifying topics, themes and series that are likely to work well in video and then working with editors and content owners to realise the video and the article it is published in. One of the projects to come from this new way of working was the creation of three new themed video series, Household Hacks, Scams Investigations and Money Advice Shorts. These series were specifically designed to both drive sign-ups to our free newsletters and increase engagement with existing newsletter subscribers.



### Making Which? content more accessible

To ensure visitors to our website and app have the experience they would expect from Which?, and to simplify our technology offering, we worked behind the scenes to rationalise our digital systems. This meant amalgamating the number of content management systems we used to publish content across our channels, and we saw **72%** of our core online traffic published through a single system. What this means in real terms is the way our content teams create, edit and publish content will be more efficient, which will lead to improved user journeys, delivering a consistent experience that is easier to navigate

and find the relevant advice and product reviews. Our new technology offering will provide significantly better performance, accessibility and search engine performance than our old one. Accessibility is key to making our content available to those with a wide range of disabilities while performance and Search Engine Optimisation (SEO) are key drivers in helping users find and consume our content across a wide range of devices.

We also introduced more self-service features on the website, for functions such as forgotten passwords and online cancellations. By offering these functions online we are able to provide a level of service expected by our members and in

addition, we reduced the number of calls to our membership team (for example, log-in issues previously made up 9% of total calls, down to 4%).

While the transformation of our digital products has faced a number of challenges in the last few years, we are confident we now have a good leadership in place to enable us to deliver the excellent digital services consumers expect. We've already seen some great steps forward with our content management systems and mobile app, and we hope to build on this success further as we work on some great foundational technology that will provide a much more stable base for our technology teams to work from.

### Retailer links

Visitors to our site increasingly expect to be able to complete their buying journey. So to meet this expectation we worked on increasing our where-to-buy product coverage across our reviews content, to enable visitors to find the products they wish to purchase more easily. Now **58.9%** of our reviews feature at least one retailer link (2020/21: **55%**).

### The new Which? app

While our app initially focused on product reviews, we continued to develop it by adding more content to demonstrate breadth of Which? membership and launched the new version in October 2021. The app totalled **142,000** downloads and plays an increasingly important role in member retention. Read more, right, on the further developments we have in store for the app to ensure a more joined-up member experience.

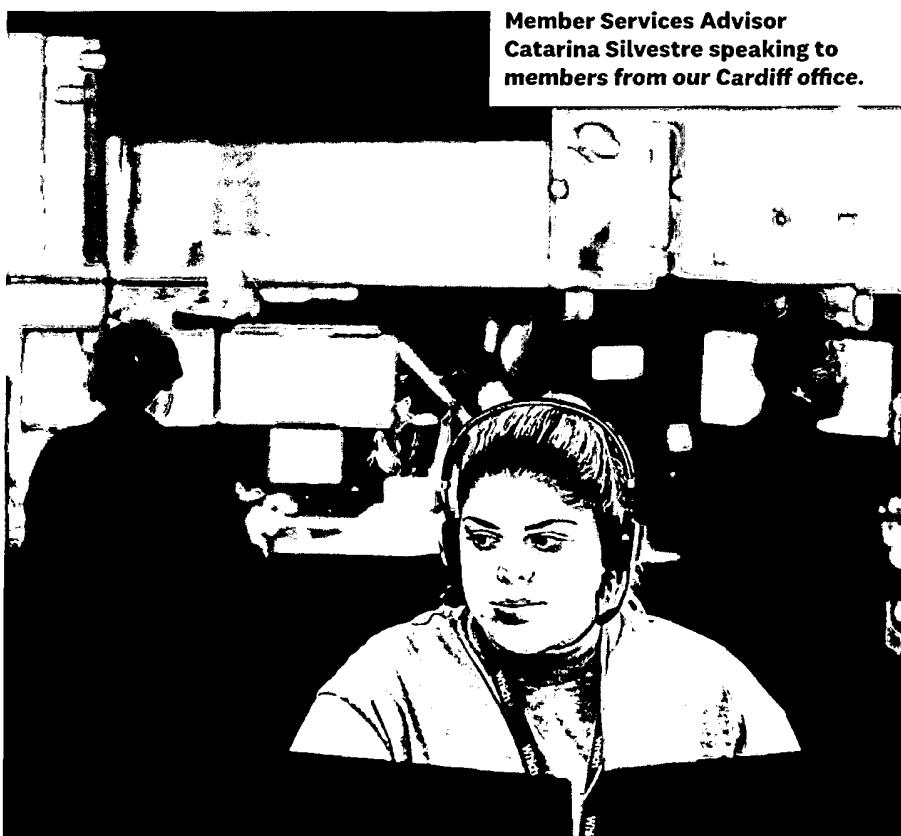
### Providing up-to-date information on energy costs

We responded quickly to the cost of living crisis across all areas of Which? (read more about this on p16), including updating our advice and information on energy costs. While our advice on switching to get the best deal was affected by the lack of deals on the market, we worked hard to ensure consumers can find accurate information on the latest changes in the price cap. As the price cap that Ofgem sets for domestic energy

### Snapshot

Our Money helpline has dealt with **11,808** cases and achieved **£2,331,218** in redress and compensation (2020/21: **14,422** and **£1.7m**).

Our Legal helpline has dealt with **20,451** cases and achieved **£767,039** in redress and compensation (2020/21: **25,937** and **£1.6m**).



**Member Services Advisor Catarina Silvestre speaking to members from our Cardiff office.**

costs now changes more regularly, we update the annual running costs published in reviews across several product areas. In preparation for the most recent price cap increase in April 2022, **1,757** product reviews across **12** different product categories were updated. At the same time, a new (largely automated) process was

developed and initiated in order to make future calculations of running costs easier, quicker and more efficient. The aim of this was to make it easier for consumers to understand how the increase in energy prices was affecting the running costs of the some of the main energy consuming items in their houses, such as fridge-freezers.

### Looking ahead

**Rather than ignoring technology challenges we'll continue to invest in new systems and embrace new technologies, and we're starting to see the green shoots of that labour now.**

As we continue to simplify and modernise, in 22/23 we plan to incorporate the content from the Which? Magazine app in to the main Which app, providing a single app where users can get the best of Which? all in one place. Research shows that members aren't fully aware we have two apps, and those that are aware are confused about what the difference is between them. In 2022/23, we are also building the ability for non-members to subscribe to Which? directly through the app.



# **Our environmental, social and governance work**

This year we've reorganised our reporting on environmental, social and governance data. We hope you find this structure is a clearer way to explain the important work we're doing internally and externally when it comes to sustainability, diversity and inclusion, our people and how we are run.

# Environment

How Which? is operating more sustainably

## Carbon neutral certified

We are proud that Which? is now certified as carbon neutral (PAS 2060 standard) for all UK operations – this is a step towards our ambitions to significantly reduce our overall carbon impact, but there remains much more to do. In this forthcoming financial year we are working towards a more complete measurement framework across all emission scopes and target-setting for our path to carbon net zero emissions.

Supported in our reporting by EIC, energy management consultants, we achieved this by providing funding for the development and expansion of renewable energies in developing countries via carbon credit provider atmosfair.

## Around our offices

We made changes around our offices in 2021/22 to make them more environmentally friendly.

We looked at multiple ways to reduce our carbon footprint, including waste management, single-use plastics, our cleaning products and our energy supplier.

In October 2021, we switched our existing London office energy provider to a green provider that directly generates and invests in its own generating assets and has a 100% renewable fuel mix. We also switched to a new waste provider that is able to provide more accurate data and monthly reporting on the waste and recycling collected from our London office. The new provider has a state-of-the-art facility specialising in recyclables into different waste streams which are then reprocessed into new products as part of their commitment to the waste hierarchy.

In February 2022, we removed single-use cups and cutlery in favour of ceramic mugs and metal cutlery, following the reduction in risk attributed to Covid. We also moved to a new stationery provider that is committed to sustainability.



## Colleague Sustainability Champions

Our Sustainability Champions are here to help Which? staff make more sustainable choices in our everyday lives. The Champions do this by regularly promoting tips and ideas and by running fun activities to get people thinking about the impact of our lives on the planet. This year, this included 'Veggie Cook and Share' where the Champions promoted sustainable vegetarian recipes to colleagues via a staff event and the intranet.



In 2021, we changed our standard cleaning consumables supplier to one that uses fewer chemicals, recycled packaging and fewer deliveries due to the transportation of undiluted

products. In early 2022, we went one step further and switched to a supplier with even greater environmental credentials, including vegan-friendly products and UK-based production.

# Streamlined Energy and Carbon Reporting (SECR)

We analyse how much energy we use in our offices and when our employees travel on business to calculate our energy use and carbon emissions. Below is the 2021/22 assessment for the Consumers' Association and Which? Limited.

The energy has been converted into greenhouse gas (carbon) emissions. From this assessment we have calculated a ratio of 0.43 tonnes of CO<sub>2</sub>e emissions per average employee in the Group, compared to 0.91 tonnes in 2020/21. This change has been driven by an improvement in the estimation method for offices not owned by the Group. The meter-reading programme that took place this year revealed that electricity and gas consumption is much lower than previously estimated. In addition the

closure of the Bristol office contributed to further decline in emissions.

## Intensity ratio

### (CO<sub>2</sub>e per full-time equivalent):

0.43 tonnes of CO<sub>2</sub>e per average number of employees in the Group in the year to 30 June 2022, (2021/22: 0.91 tonnes of CO<sub>2</sub>e per average number of employees in the Group).

## Energy efficiency measures taken this year

The measures taken in ensuring Which? is operating more sustainably are explained on the page opposite.

## Methodology

The electricity and gas quantities used in the year were taken from the suppliers' invoices for use of our headquarter offices, 2 Marylebone

Road in London. The conversion of gas from kWh to CO<sub>2</sub>e was based on gross calorific values. Conversion factors for this and the below were obtained from [www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2022](http://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2022). The usage of gas and electricity in the offices not owned by the Group were taken from actual readings compared to the prior year, when estimates were taken based on the floor area at each site multiplied by kWh for 2 Marylebone Road. The quantity of kWh used for transport is based on the mileage completed by employees on business expenditure and converted to kWh using 'average car' by size and 'unknown basis' of fuel-type conversion factors from the above website.

## WHICH? SECR UK ENERGY USE

Activity	CONSUMERS' ASSOCIATION			
	2021/22	2021/22	2020/21	2020/21
	kWh	GHC - Tonne of CO <sub>2</sub> e	kWh	GHC - Tonne of CO <sub>2</sub> e
TOTAL GAS	231,594	42.4	220,215	40.3
TOTAL ELECTRIC	963,963	204.7	842,533	178.9
Transport	11,114	2.6	11,476	2.7
<b>TOTAL</b>	<b>1,206,671</b>	<b>249.7</b>	<b>1,074,224</b>	<b>221.9</b>

Activity	WHICH? LIMITED			
	2021/22	2021/22	2020/21	2020/21
	kWh	GHC - Tonne of CO <sub>2</sub> e	kWh	GHC - Tonne of CO <sub>2</sub> e
TOTAL GAS	5,820	1.1	365,007	66.9
TOTAL ELECTRIC	79,870	17.0	1,396,502	296.5
Transport	27,420	6.5	14,359	3.4
<b>TOTAL</b>	<b>113,110</b>	<b>24.6</b>	<b>1,775,868</b>	<b>366.8</b>

Activity	GROUP			
	2021/22	2021/22	2020/21	2020/21
	kWh	GHC - Tonne of CO <sub>2</sub> e	kWh	GHC - Tonne of CO <sub>2</sub> e
TOTAL GAS	237,414	43.5	585,222	107.2
TOTAL ELECTRIC	1,043,833	221.7	2,239,035	475.4
Transport	38,534	9.1	25,835	6.1
<b>TOTAL</b>	<b>1,319,781</b>	<b>274.3</b>	<b>2,850,092</b>	<b>588.7</b>

## How Which? is helping consumers live more sustainably

### Supporting consumers in the transition to net zero

The policies required to meet net zero targets will need action directly from consumers, as well as by the government and businesses. The changes needed will be increasingly apparent in everyday consumption choices, whether that's how people travel, heat their homes, choose what to buy or what to eat. This will require complex and, in some cases, costly changes and the right type of support.

Which? undertook a survey of more than 3,000 people around the UK, representative of the UK population and nations, and hosted a series of expert roundtables to explore some of the barriers facing consumers when making lower-carbon-impact choices. This research explored consumer attitudes in four key areas: electric vehicles, heating, white and tech goods and food choices, and made recommendations for how people can be better engaged and supported in making this necessary transition.

Our research found that most people understand the urgent need to act to tackle climate change and many people are already taking action to be more sustainable. However, these actions aren't yet on the scale of what is needed – there's a mismatch between what most people think will have the most impact and the changes experts think are most needed. People are looking to the government, businesses and organisations to do much more to support them. Our full findings were presented in our "Supporting consumers in the transition to net zero" Policy and Research report in October 2021.

### Eco Buys

In 2020/21 we launched our new Eco Buy that assesses the repairability, longevity and energy efficiency of products, similar to our longstanding endorsements such as Best Buys. Since the launch, we continued to expand the products considered for this endorsement. In 2021/22 this totalled more than **200** Eco Buys across **12** product ranges (2020/21:

### Providing an expert voice at COP26

In 2021/22, as well as hosting a series of expert policy roundtables on some of the key areas where consumers can make a difference, our director of policy and advocacy, Rocio Concha Galguera, was invited to join an expert panel with the Confederation of British Industry (CBI) at the 2021 COP26 conference held in Glasgow. Rocio shared with the panel some key insights Which? has gathered, and talked about how consumers need access to trustworthy information. Being invited to speak at such a prestigious event, one that welcomes global leaders and people of influence in the sustainability sphere, demonstrates that Which? is a trusted expert voice when it comes to both consumers and sustainability.

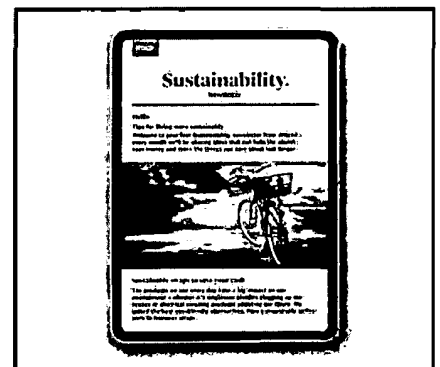
*"People need clear information that they can trust. That includes understanding which changes will have the most impact overall, but also being able to make choices between products based on information about relative emissions throughout the whole lifecycle, how this relates to other environmental impacts and having confidence in environmental claims that products make. It also needs to be much easier and more straightforward for them to recycle."*

Rocio Concha, Which? Director of Policy and Advocacy, speaking at COP26

60 and 6), as well as an Eco Providers endorsement. We heard from our members how useful they find the Eco Buy logo when selecting products and services, with **95%** of members surveyed telling us they found it either very or fairly helpful as part of their decision-making – either making their decision easier and/or opening their eyes to different options they might not otherwise have considered. As well as aiding decision-making, the label also has an 'educational' function – with **63%** reporting that it made them more aware of how a product can be environmentally friendly. One member told us: "I specifically searched for an eco product and was thrilled to see the guidance was so specific" and another saying Eco Buys gave them "greater awareness of which products are better for the environment". Companies are finding it useful too, and since launch we have sold **23** Eco Buy licences.

### Launch of the sustainability hub

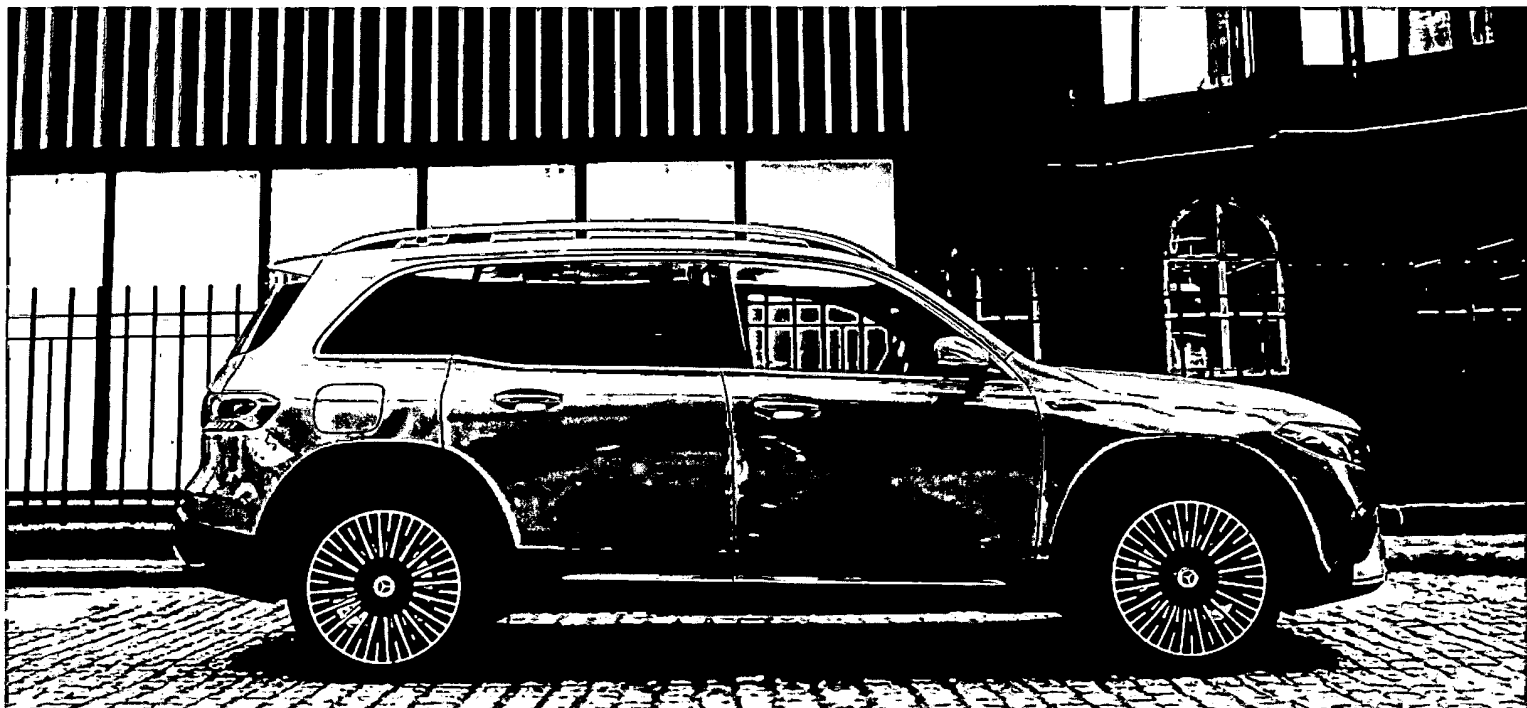
We are increasing the amount of sustainability content online and in our magazines, including a regular green column in Which? magazine, a monthly sustainability newsletter, the first season of the Which? Investigates podcast, and a host of research resulting in brilliant advice on a range of topics from diet to energy efficiency, travel and more. We launched our sustainability hub on the Which? website in October 2021, giving free advice to consumers on how



to buy better and live better. As a result, sustainability content has gone from strength to strength in 2021/22, receiving **3.2m** page views (2020/21: **916,000**). Of the increase in page views, **2.5m** were new visitors to **which.co.uk**, showing that it has appeal to audiences that haven't considered Which? before. As the cost of living crisis deepened some of our most popular content was on lowering energy usage and reducing energy bills.

### Competition and Markets Authority Green Claims Code

In a bid to tackle greenwashing, the CMA has published its Green Claims Code to help businesses communicate their eco credentials without misleading consumers. Which? fed our evidence of problems that consumers face into this call and also fed into a wider CMA consultation on how consumer and competition law can support net zero, supporting clearer definitions for green claims.



## Ramping up our focus on electric vehicles

The UK government has introduced a ban on the sale of new petrol and diesel cars from 2030 and sales of electric vehicles are rising quickly, making up **14%** of all new car sales in the UK (according to Society of Motor Manufacturers and Traders data). As a result, our reviews and advice on electric vehicles have grown in popularity, with a **64%** increase in visits to this advice compared to 2020/21. We launched the cars newsletter in April 2022, which already has more than **14,000** sign-ups, and this regularly features electric cars.

We are now regularly sought after by external media to provide our insight and expertise on electric cars and their infrastructure. This led to us developing our policy work to understand the barriers facing consumers and we published a report on the public electric vehicle charging network with a number of policy calls to the industry and government. The report also set out that the roll-out of public charging infrastructure is not happening quickly enough, and highlighted a fairness issue that showed that those drivers who can't charge from home face paying more to recharge, as our research showed that charging on the public network can be significantly more expensive.

As a result of our findings, we called on the government to:

### **Make charging points more available and accessible.**

Drivers should be able to easily find an available, working charger nearby, park up and pay. The needs of disabled drivers should also be catered for.

**Make payments easy and clear.** You should be able to pay easily using your bank card or via one app or identification card. Pricing should be simple and comparable.

**Provide a reliable network with adequate support.** Charge points should be reliable, but if something should go wrong, adequate support should be on hand and a suitable system of redress for any experience that requires it.



**Daljinder Nagra from our cars team with one of the electric vehicles we've tested.**

## Looking ahead

Home heating is another major source of UK emissions and Which? is developing a new area of work to understand the policies that are needed to support consumers in the transition to low-carbon heating, including how energy efficiency can be improved in the short term. We already know that this is going to be a major challenge for the government and consumers given installing new heating systems and upgrading insulation can be costly, complex and disruptive. But with rising energy bills causing real anxiety for many consumers this is an important area for environmental and financial reasons.

# Social

## Content for all UK consumers

We want to ensure our content is relevant to the breadth and diversity of UK consumers. This includes the sort of content we publish and the consideration of diverse consumers in our research. The diversity survey published in the magazine in April 2022 ('the shocking scale of prejudice exposed') looked at consumers' reporting of discrimination by ethnicity, language and age among other things. We published a wide range of articles around consumer needs across diverse backgrounds, including looking at the accessibility of banking for disabled consumers, conducted research into discriminatory practices towards LGBT+ users of dating app Tinder, ran an article highlighting the differences in health outcomes between the wealthiest and poorest in society and different ethnicities and how this manifests after 65, to name but a few.

The feedback we had from our members on these articles serves to reinforce the importance of this type of content. When we published 'The future of your phone line' – a three-page feature in *Which? Computing* that explained the move to digital phone services and the potential impact on consumers (particularly those reliant on a traditional phone line, who are more likely to be older and/or disabled), we received positive feedback from members, with **89%** telling us they found the content useful and **94%** saying they found it relevant.

We also tailored our information relating to the energy crisis to be relevant to diverse consumers. Our advice guide on prepayment energy meters, which had lots of useful information for households on prepayment tariffs, saw visits to the page more than double compared to last year, with **3,695** in January to June 2022 an increase from **1,820** in the same period of 2021.

## Snapshot

The launch of our new Which? Fund will see our organisation fund projects from other not-for-profit organisations to get a better understanding of consumer harm in diverse and disadvantaged communities.

We published a wide range of articles around consumer needs across diverse backgrounds, including looking at the accessibility of banking for disabled consumers, and conducting research into discriminatory practices towards LGBT+ users of dating app Tinder.

We are continuing with our test and learn approach to hybrid working to ensure this works for both our organisation but also gives colleagues improved flexibility in where they work.

We welcomed new apprentices and interns to provide opportunities for entry to professions ranging from finance to marketing.

**Rhyanna Awuku joined our marketing team for 12 weeks as part of the 10,000 Black Interns Programme.**







Shail Patel was our 'letter of the month' in the June edition of our *Which?* magazine, where he shared his thoughts on racism and disability.

We provided a dedicated guide on ways to save money on broadband bills (including advice on social tariffs), which saw over **25,000** unique visits.

### Launching the Which? Fund

Which? wants to make sure that the voices of all consumers are heard, and that action is taken to tackle consumer harms. But consumer harm takes many and varied forms, and is often difficult to spot. Some groups of consumers, for example, people living with disabilities or health conditions, low-income households and members of diverse ethnic communities, may be more exposed to consumer harm in particular markets, or affected by different types of harm.

We understand that, in some cases, other organisations who work more closely with specific communities, or who have specialist technical skills, will be better placed to explore and tackle this harm. We wanted to enable those working closely with diverse and disadvantaged communities to investigate the harm they are experiencing, and to identify potential solutions.

To make sure that the voices of these communities are heard we opened a call for applications to the new Which? Fund for research projects that would

use innovative methodologies to build evidence of the harm experienced by diverse and disadvantaged consumer groups, and to develop evidence-based solutions. After a tough, competitive process we selected four projects to fund:

- **The Money and Mental Health Policy Institute** will look to explore and tackle unfair discrimination against people with mental health problems in key insurance markets;
- **National Energy Action** will look at how we can strengthen energy advice and support networks for Gypsy, Roma and Traveller Communities;
- **The Pensions Policy Institute** will assess and address the pensions policy impact of inadequate ethnic minority coverage in national data sets;
- **The Social Market Foundation** will explore whether there is a gap in the take-up of financial products among consumers from an ethnic minority

background, why this might be and what would help.

Each of these projects will expose consumer harm in areas which are currently under-researched, explore potential solutions, and make the case for change, rather than just adding to the evidence. Ultimately, we hope this approach will allow us to tackle the consumer harm faced by diverse and disadvantaged communities across the UK, in partnership with the organisations we have funded.

We also partner with and contribute funding to a number of other organisations to amplify our work – notably International Consumer Research and Testing Limited, Consumers International, and the Bureau Européen des Unions de Consommateurs – and we have supported the work of the Research Institute for Disabled Consumers (RIDC) through charitable donations of £75,000 in-year.

## Addressing diversity and inclusion at Which?

### A diverse workforce and leadership

We revisited our 'What makes you, you' questionnaire in 2021/22 to ensure we have an accurate picture of the diversity of our colleagues, Leadership Team, Council of Trustees and Board.

We completed a full review of our employee diversity and inclusion activity which means we now have a clear road map to improve both our diversity and inclusion in 2022/23.

We engaged with an external consultant to support a full diversity and inclusion review across the business. This has given the organisation some clear considerations and priorities to improve both diversity and inclusion going forward.

### Diversity and inclusion colleague networks

We now have a number of networks that have started during the year from our Mosaic Network that provides a supportive social space for ethnic minority colleagues, to our Neurodiversity Network, which provides a space for our neurodiverse colleagues and those who share their lives with neurodiverse/ Autistic Spectrum Condition (ASC) family and friends. We also have the newly established Disability Network launched in the summer of 2022 and our established Parents Support Slack channel is moving towards becoming a Network. Alongside our longest established network, the LGBTQ+ network, we now have five networks that meet regularly both socially and to feed back into Which? to ensure all colleagues feel valued and supported. We have provided training to support and develop the network chairs' leadership skills and help unlock the potential of each network. Training is also delivered to executive sponsors as they play a critical role in the success of a network.

### Diverse opportunities for entering the workplace

Our apprenticeship programme continues to flourish with two securing permanent roles in our Finance and Content teams internally and two



**Our social media team (L-R), Oliver Abel, Hannah Ballantyne, Cameron Wells, Harry Tattersall and Jay Warn.**

finding roles externally. The success of the scheme means that our remaining cohort of four apprentices are shortly being joined by four more in Product Testing, Data Compliance, External Affairs and Finance.

In June, we were also pleased to introduce two interns for a six-week internship through our involvement in the 10,000 Black Interns Programme. The programme looks to transform the horizons and prospects of young Black people in the UK, by offering paid work experience across a range of industries. Which? is proud to support the programme and looks forward to welcoming two more interns through the programme next summer. Both the apprenticeship scheme and the 10,000 Black Interns scheme support young people looking to gain professional skills and develop their careers in a real work environment.

We post all our jobs on Vercida to increase the accessibility of our job adverts and to reach a wider demographic, and have introduced a scorecard to the application process alongside an opt-in option to the disability confident interview scheme.

### Diversity on our Council of Trustees and Board

Diversity amongst our Council of Trustees and Board members is an active consideration for our governing bodies. In-year, the Council's

Nominations Committee has worked successfully with a specialist diversity and inclusion recruitment agency to widen the diversity of candidates who have applied for available roles and has also revisited its appointment processes to improve their inclusivity, making sure they are fair, without feeling intimidating. In their second annual report to the Council of Trustees this year, the independent members of the Nominations Committee confirmed that the search process and appointment for new trustees and non-executive directors in 2021/22 was conducted on a fair, transparent and inclusive basis.



**Our apprentice Laura-Jane Wills** talking about her experience of the apprenticeship programme so far:

*"Starting this apprenticeship has helped me to figure out where I want to go in life, and is giving me the foundations for starting a career."*



**Co-chairs of our Mosaic Network, Natalie Powell and Kundai Musara.**

## Our people

### Hybrid working

In October 2021 and April 2022 (due to differing restrictions in England and Wales) our colleagues returned to the office under a new hybrid working model. We continue to review our approach to take into account changing demands of colleagues and their wellbeing, as well as business needs. We agreed with colleagues that our approach to hybrid working would be on a test and learn basis so we could understand and assess the effectiveness and hear from colleagues of where improvements and investments might be needed. In reality this has meant that our offices are less occupied than pre-pandemic and it is important to review our approach. While we have decided not to make any significant changes to our office space requirements now, we will continue to review the best use of our office space (and in turn, the cost of this) as well as the colleague experience we want to create for the future world of work.

### Colleague wellbeing

We implemented a series of initiatives including regular virtual and hybrid training and advice events around nutrition, mental health and diversity and inclusion to support colleagues. We also regularly communicate and remind

colleagues about the benefits available to them to help with their wellbeing, such as access to our employee assistance programme, Business Disability Forum and occupational health.

### Communicating with colleagues

We regularly communicate with our colleagues through our various channels, including our intranet, our internal social channels and all-staff emails. We've also continued our Forum events, which see the Chief Executive report back quarterly on the performance of our organisation both in terms of financial performance but also charitable and organisational objectives.

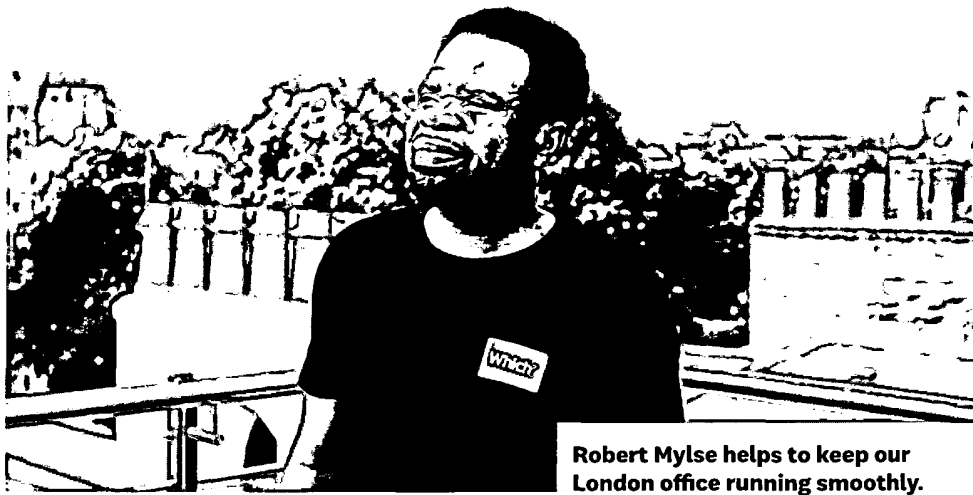
We host a number of colleague events to help with understanding of Which? and also promote colleague wellbeing. We've continued to run our Let's Talk events, a series which over its two-year run has explored a range of topics from mental health to disability. Our Spotlight events allow teams to highlight the work they do to the rest of the organisation. In 2021/22, this included a session on the new Which? App from the Product team and a session on our data strategy from the data strategy working group.

It's important that all of our colleagues feel they have a voice, something we've been especially mindful of with the shift to hybrid working. We've made some

changes to our regular engagement survey after feedback from colleagues told us they felt the quarterly survey was too long and some questions (such as those about their working environment) have become less relevant or needed to be amended. After consultation across all departments and levels we have now moved to a twice-yearly full survey, with twice-yearly, shorter 'pulse' surveys in between, each with updated questions. We have also engaged with colleagues on other initiatives, including our return to the office in which a colleague group was set up to hear concerns and needs to smooth the transition to hybrid working.

### Development and team growth

As well as promoting access to tools such as LinkedIn learning, in which **455** colleagues engaged in **1,057** hours of online courses, our People team also provided internal workshops to **155** colleagues. Disability awareness, managing mental health and high-performance training was delivered by external training providers. We launched our 'Squiggly careers' initiative based on the book of the same name by Helen Tupper and Sarah Ellis. Which? recognises that careers are no longer linear and people may jump between roles, companies and industries. We provide webinars that explore the book chapters and



**Robert Mylse helps to keep our London office running smoothly.**

## Reward and Remuneration

### Embedding our new reward principles

In 2020/21, we announced and implemented new reward principles to help on our journey to become a more flexible, inclusive and inspiring place to work. We have a total reward approach to rewarding our people that goes beyond salary and includes both financial and non-financial benefits such as an annual award scheme, recognition schemes, pension, insurance benefits, 28 days annual leave, enhanced family and sickness leave, a wide range of wellbeing activities and access to Which? products and services to name a few.

### Our reward principles:

- Open, transparent and free from bias
- Reflective of and appropriate for a not-for-profit organisation
- Recognises contribution
- Informed by our colleagues

### How pay is decided

In line with our reward principles we externally benchmark salaries against the relevant job family and market to ensure our people are being paid appropriately for the work that they do. Our process is mindful that we are a not-for-profit group, owned by a charity, and that our funding model is very different from many other charities. Unlike other charities, the Consumers' Association does not receive public funds or donations. All our charity and advocacy work on behalf of all UK consumers is funded by the revenue generated from our commercial activities. This means we compete for talent in both the commercial and charity sectors and our remuneration packages will benchmark against both sectors. All our employees receive a fixed base salary and a variable pay element of their benchmarked total reward package. To ensure our base salaries meet the everyday needs of our people we are an accredited Real Living Wage employer.

exercises for each of the career pathing elements. In May 2022, we launched 'Learning at work week', which saw colleagues across the business share their skills, in everything from coding to baking to photography. We also support our people in taking non-executive external roles, as we believe it contributes to their development and supports our

commitment to colleague wellbeing and diversity of experience.

We onboarded more than **30** new joiners in our product and technology teams. Growing these teams is vital to supporting the work on our digital transformation. As well as in product and technology, we recruited more widely (**208** colleagues in year) bringing our total employee number to more than **650**.

### Modern slavery compliance

Which? takes a zero-tolerance approach to slavery and human trafficking and is committed to ensuring they do not take place in our organisation and supply chains. Although we consider the sectors in which we and our supply chains operate to be at lower risk, we continue to review our internal policies and supplier arrangements to ensure ongoing compliance to the UK Modern Slavery Act. Our anti-slavery statement can be viewed on our website: [www.which.co.uk/about-which/company-info/which-antislavery-statement](http://www.which.co.uk/about-which/company-info/which-antislavery-statement). We ask all our employees to complete mandatory training in modern slavery compliance.



### Colleagues living our values

We recognise our colleagues for living our values through our monthly Values Sharer Award and then in June we select an overall winner for the year. As well as this, we ask colleagues to vote for colleagues in other categories that reflect our values, such as Diversity and Inclusion Colleague of the Year, and Sustainability Champion of the Year.

*This year's winner, resourcing specialist **Linda Williams**, said of their win: "Recruitment isn't normally an area where one is acknowledged, so to be honoured in this way by my peers has blown me away. I'm really humbled and honoured to have been chosen."*



## Future Reward Plans

We will continue to work with an independent remuneration consultant to improve and shape our reward policies bringing in external perspectives.

For 2022/23 we will review our benefit offering, ensuring we seek input from our colleagues and continue to monitor their feedback through our engagement survey platform.

## Gender pay gap

Our group gender pay gap, at the snapshot date of April 2021, shows on average for the eligible employee population men are paid **3.64%** more than women. This is significantly below the national average although the mean pay gap has slightly increased from **2.23%** as reported in 2020, the median pay gap has reduced from **3.31%** to **2.93%**, as reported in 2020. Whilst there is still room for improvement we are confident that we have robust policies and procedures in place, such as equal pay audits, to ensure that we reward equal pay for equal work.

The median pay gap is driven by the fact some specific departments at the snapshot date, had a greater proportion of men. This includes, for example, our Technology team and senior colleagues in our Commercial team. These industries are traditionally both male-dominated and more highly paid than other markets. Conversely, we had a higher proportion of women working within customer service roles which is in line with traditional trends externally. These roles also tend to be lower paid, which will drive a lower average hourly rate of pay.

## Ethnicity pay gap

In March 2022 we reported our Ethnicity Pay Gap Results for the first time. This forms part of our commitment both to Diversity and Inclusion and to transparency. The Ethnicity Pay Gap Results are calculated using the same methodology as the Gender Pay Gap calculations. For the April 2021 snapshot date, our group ethnicity pay gap shows on average for the eligible employee population, colleagues are paid **3.43%** more than colleagues who reported their ethnicity as White.

## Remuneration of key employees

Our key employees are defined as our leadership team. The total remuneration for our key employees was **£2.0m** as noted on page 57. This is a decrease of 8.6% year-on-year. Our highest-paid employee is our CEO, remuneration detailed in the table below:

Component	Amount 2021/22	Amount 2020/21
Basic salary	£250,000	£250,000
Car allowance	£10,000	£10,000
Pension allowance	£27,857	£27,857
Bonus	£69,125	£86,146
<b>Total</b>	<b>£356,982</b>	<b>£374,003</b>

There has been a 5% reduction in total paid when compared to 2020/21, mainly driven by a lower annual award amount (previously called variable pay). The annual award for our CEO is linked to organisational objectives, some of which were not achieved, hence why the annual award paid this year is lower than in 2020/21. The total remuneration package was the same as previous year.

## CEO pay ratio

Below you will find the CEO Pay Ratio. This is the ratio of the CEO, our highest-paid employee when compared against the employees that represent the 25th, median and 75th percentile.

Year	Method	25 percentile ratio	Median ratio	75 percentile ratio
2021/22	Option A	6	8	11

This calculation has used method A in line with the government recommendation. We have included any employee who has worked for at least one month during the calendar year to ensure an accurate full-time equivalent pay can be calculated. To ensure a like for like comparison we have calculated the full-time equivalent for any of the following:

- Employees who work part time
- Employees who did not work the full 12-month period
- Employees who received reduced pay for any reason during the year. This would include Maternity Pay, Shared Parental Pay or Statutory Sick Pay.

All forms of pay and benefits have been included in the calculation of the pay ratio, but we have excluded any payments that do not relate to roles being performed. This includes payments made for First Aid or Fire Marshall responsibilities or payments that related to compensation for loss of office.

We do not take any government funding or donations to support our organisation, all remuneration is funded via commercial activities and as such we believe that our ratio is an accurate representation of our pay policy and principles. Our reported figure is significantly less than the average median ratio of the FTSE 350, which is 44.1.

## Director's fees and expenses

Council trustees do not receive any payment for their services. They are reimbursed for travel and accommodation expenses incurred when attending Council and committee meetings and other official events. During 2021/22, claims were made by 5 out of 15 trustees (2020/21: 0 out of 15) totalling £2,408 (2020/21: £nil). Insurance costs for the year to protect Council of Trustees members against liabilities arising from their office totalled £8,960 (2020/21: £7,000). Non-executive directors on both the Which? Limited and Which? Financial Services Limited boards are remunerated for their services. The total remuneration in the year for Which? Limited non-executive directors was £97,292 (2020/21: £91,458). In Which? Financial Services, the total remuneration was £18,333 (2020/21: £20,000).

# Governance

## How we're run

### The charity

The Consumers' Association is the parent of the Which? Group. It is established as a company limited by guarantee (no. 00580128) and a registered charity (no. 296072). The Consumers' Association is governed by its Council of Trustees and wholly owns the trading company Which? Limited.

### The role of the Council of Trustees

The Council of Trustees sets the strategy for the Group to enable the charity to deliver its charitable purposes; provides scrutiny, support and challenge to the Which? Limited Board and the Leadership Team to drive progress and deliver impact; and stewards the charity to make best use of its resources, protecting and conserving its assets for consumers today as well as tomorrow.

The Council of Trustees aims to focus its time in five key areas: strategy to deliver our purpose, operational performance, financial performance, risk, and governance (including culture and stakeholder matters), balancing the time spent on each.

### Application of the charity governance code

As a charity, we aim to apply the high standards set by the Charity Governance Code. This means we adopt an 'apply or explain' approach to the Code. The trustees are satisfied that the charity applies the seven principles in the Code. The Council of Trustees supports a culture of continuous improvement, including in relation to its governance.

## Governance Committees of the Consumers' Association

The Council of Trustees and the Board are supported in their work by a number of specialist committees and ad hoc sub-groups and working groups. The trustees determine remit and membership. The group's formal committees are:

### Remuneration Committee

Makes recommendations to the Council of Trustees and decisions on remuneration of the Group CEO and other Group senior executives, as well as the overall pay policy.

### Nominations Committee

Responsible for succession planning for the Council of Trustees, the Which? Limited Board and Group CEO.

### Strategic Finance Committee

Makes recommendations on the charity's reserves policy, treasury management, investment portfolio and the Group's pension liabilities and provides strategic advice on major capital expenditure.

### Group Audit & Risk Committee

Responsible for monitoring the integrity of financial statements, overseeing the external auditor relationship and reviewing the adequacy and effectiveness of the Group's risk management arrangements and internal control environment. The Group Audit and Risk Committee has at least one member with recent and relevant financial experience.

### Policy & Advocacy

Provides advice, support and challenge to the Leadership Team in the development and delivery of the organisation's strategy for influencing businesses and policy makers to address consumer harm and provides assurance to the Council of Trustees on activities and impacts delivered.

### Member Governance Committee

Provides a forum for considering governance issues and formal proposals raised by ordinary members.

## This year the Council of Trustees has:

- Continued to monitor the delivery of our audience-led strategy and approved an updated three-year plan.
- Provided oversight and support for the CEO and the Leadership Team in managing the organisation through its return to the office and a period of 'test and learn' of hybrid working as well as the impact of the cost of living crisis.
- Together with the Board, closely monitored and provided support and challenge on the Group's technology transformation through a new working group – the Technology Sub Group.
- Carefully considered and approved proposals to refund a cohort of Which? Limited subscribers that the Board considers have overpaid for online services in the past.
- Endorsed the creation and delivery of the first ever Which? Fund project funding allocations (read more on page 33).
- Through its Nominations Committee, commenced recruitment for a new Chair of the Board following Judy Gibbons's decision to retire, and of two new trustees.
- Established the Strategic Finance Committee, bringing together and replacing the Investment Committee and Pensions Working Group. This committee was born out of the recommendations of the 2019 independently-led Governance Review.
- Agreed to reduce the number of Deputy Chairs of Council to one and reshape the role so that (among other things) the Deputy Chair takes over the role of the Member Governance Committee. This means that the Member Governance Committee, which has been inactive in-year as no proposals have been put forward by ordinary members, will be disbanded. (The website will be updated with details of how members can contact the Deputy Chair. Members will still be able to submit resolutions to the AGM, for guidance, go to the Which? Website > About Which? > How we're run > AGM.)

## Trustee appointments and terms

The charity reviewed its trustee appointment process in 2019, with changes approved by members at its



Yvonne Fovargue MP joined our Online Safety Bill parliamentary event

AGM. In accordance with the charity's articles of association, trustees are appointed for terms of approximately three years, which generally run from AGM to AGM. Trustees cannot serve for more than three terms other than in very exceptional circumstances. The decision to approve an appointment or renew a trustee is subject to a vote of ordinary members at the charity's AGM.

We explain on page 40 the process to recruit new trustees. Decisions to recommend renewal of a trustee at the end of their term take account of the outcome of annual appraisal conversations held between each trustee and the Chair of the Council of Trustees as well as a wider consideration of the skills and experience the Council needs.

Further details on our trustee appointment and renewal process are set out in a Trustee Voting Booklet which is sent by email or post to members who are eligible to vote on appointments. It is also available on our website > About Which? > How we're run > AGM.

## The charity's subsidiaries

Which? Limited is a registered company (no. 00677665) and generates the income for the Group to enable it to provide its many products and services to, and deliver impact for and with, UK consumers. The Which? Limited Board (the Board) sets and oversees the commercial direction of Which? Limited within the context of the Group strategy, vision and values, with the aim of delivering a long-term sustainable financial return for the charity.

The Board, which is appointed by the Consumers' Association, is chaired by Judy Gibbons (until October 2022) and consists of six other independent non-executive directors and our CEO. Following Judy's retirement from the Board, Harry Gaskell (currently a trustee and Board member) will become

the Board Chair and will retire from the Council of Trustees.

Which? Limited owns a small financial services company, Which? Financial Services Limited (no. 07239342), regulated by the Financial Conduct Authority (FCA), and Which? Legal Limited (no. 08109992), which remains dormant. Which? Financial Services has applied to the FCA to be de-authorised and no longer regulated by the FCA because it no longer carries out any regulated activities. Its application is expected to be granted in the year ending 30 June 2023.

## Day to day

The Group strategy is developed and agreed by the Council of Trustees and the Board and then implemented by the Chief Executive, who looks after the day-to-day running of the Which? Group, with support from the Leadership Team and staff members based in Cardiff, London, Capel Manor Gardens and at home. Neither the Chief Executive nor any member of her Leadership Team are trustees.

## Trustee changes in-year

The Council of Trustees consisted of 14 trustees at 30 June 2022. Their names are on p66 together with a record of their attendance at meetings during the year. Three trustees have been put forward for re-appointment by the members at the 2022 AGM, each coming to the end of a three-year term: Caroline Baker, Richard Sibbick and Charles Wander. The trustees will also be seeking approval of two new trustee appointments – Cindy Rampersaud and Adam Shutkever – following an open and rigorous appointment process. In addition, Harry Gaskell will be stepping down from the Council of Trustees when he takes on the role of Board Chair and Brian Yates will be retiring from the Council of Trustees at the 2022 AGM having reached the maximum term of service.

## Trustee recruitment and ongoing support

When recruiting for trustees, our process enables us to identify skills and experience gaps and search accordingly. The independent Nominations Committee members report to the Council annually on the fairness and transparency of Trustee and Board recruitment processes. Their report on the processes undertaken in this financial year concludes that our processes were fair and transparent.

When onboarding new trustees and directors we provide them with a clear induction programme, to quickly give them a detailed understanding of the organisation. This includes providing formal and informal training on their duties to ensure they are compliant with relevant governance requirements.

After onboarding, we provide them with a number of training opportunities in areas such as charitable spend, finances and the organisation's reward approach. Training can also be responsive to trends, and all trustees were offered the opportunity to complete cybersecurity awareness training due to looming cyber security threats as a result of the Russian invasion of Ukraine.

## Council independence (conflicts of interest)

We have rigorous systems and processes in place to identify, monitor and manage potential conflicts of interest as set out in our Conflicts of Interest Policy. It is considered a pre-appointment issue, declarations are then reviewed regularly, and are also part of transactional due diligence.

### Effectiveness assessments

The Council of Trustees, in line with best practice, undergoes an external effectiveness review every three years. As the independently led Governance Review was completed in 2019, we are currently undertaking an external review and any significant themes and recommendations will be included in next year's Annual Report. Trustees continue to have an appraisal each year.

## Engaging with our stakeholders and Section 172 of the Companies Act 2006

The Council of Trustees has a duty to promote the success of the Consumers' Association for the benefit of UK consumers. That success depends on our ability to engage effectively with our stakeholders and to take their views into account. When making decisions, the Council of Trustees has regard to:

- likely consequences of any decisions in the long term;
- the interests of our people; and
- the need to foster our relationships with third-party stakeholders.

For Which? this includes UK consumers, policy makers and businesses that sell goods and services to UK consumers, our

suppliers and customers, and others;

- the impact of our operations on the community and environment;
- the desirability of maintaining our reputation for high standards of business conduct; and
- the need to act fairly as between members of the Consumers' Association.

The Council of Trustees and Board receive regular updates from the Chief Executive, the Leadership Team and committees on key stakeholder relations and engagement activities and current issues. They also receive relevant feedback obtained from our interaction with stakeholders and ensure that our purpose, mission and values play a fundamental role in the way that we deliver our strategic goals and operate day to day.

## Consumers and members

UK consumers are our beneficiaries and we're here to tackle consumer harm by making life simpler, fairer and safer for them. It's our members who fund the vital work we do for UK consumers, as most of our income comes from subscriptions – we receive no money from government, public donations or other fundraising income.

### How we engage with them

Members receive access to dedicated content and advice, and also have the opportunity to get more involved in the organisation by becoming ordinary members, which gives them more say in how we're run – by taking part in our Annual General Meeting (AGM), at which they take high-level decisions relating to our governance. As well as the AGM, we have looked at other ways we can engage our members through events and have launched a new member event programme, taking into account the changes in the way people like to attend events. We have delivered two virtual events so far and we are looking at how we can provide more events, virtually, hybrid and in-person in 2022/23.

Another significant way in which we connect with our members is through Which? Connect, a research panel of more than **38,000** members who, through surveys and focus groups, feed directly into our work – from the magazine articles we write to our national campaigns. This is complemented through our social channels and Have Your Say emails, which you can read more about on p11.

In order to improve our work for all UK consumers, we have launched a new Which? Fund. The Fund aims to tackle harm in diverse and disadvantaged communities and through the Fund we hope to reach more consumers than ever before. You can read more about the Fund on p33.





**Sandra Lopez and Anisha Mistry-Jones form part of our Internal Communications team, keeping colleagues up to date on the latest colleague news.**

## **Businesses and policymakers**

Our engagement with businesses and policymakers helps to uncover harm, inform our policy, influence business practice and identify opportunities for collaboration and the co-creation of solutions that deliver better outcomes for consumers.

### **How we engage with them**

Through our policy and advocacy work, with the support of our external affairs team, we regularly meet with influential and key business leaders and policymakers. In 2021/22, we attended a number of government roundtables and committees, on subjects ranging from trade deals to the Online Safety Bill. By building our reputation with business and policymakers we've seen positive change for consumers as a result. You can read more about this on pp16 to 23.

**Ade Agunbiade and Conor Bannister sit in our People team.**



## **Our people**

Which? colleagues are responsible for delivering the overall strategy set by the trustees, are the face of Which?, and work hard on the day-to-day tasks needed to keep the organisation running effectively. You can read more about our people on p35.

### **How we engage with them**

We consult with colleagues and their union representatives regularly so that we can take their views into account when making decisions that

are likely to affect their interests. A number of employee groups provide a dialogue between the trustees, Leadership Team and staff. Feedback from such groups has been influential in our work around diversity and inclusion. The Council of Trustees receives regular reports on and considers engagement with our people, from employee survey outcomes to decisions such as engagement with the joint union. You can find out more about how we engage with our people on p35.

## Risk, reserves and compliance

Successful management of risk is key to the delivery of our strategy and objectives as we seek to manage downside risks and assess opportunities to continually improve how we champion UK consumers.

Risk management is delivered through the application of our risk management framework, which was updated and approved this year by the members of the Council of Trustees and Board. This sets out the mechanisms through which the organisation identifies, evaluates and monitors its principal risks and the effectiveness of the controls put in place to mitigate them.

During the year, we have measured our performance every quarter against our risk appetite statements (agreed last year to support effective decision making). The risk appetite statements are reviewed on an annual basis to ensure that they align to our strategic objectives and direction. Ensuring the effective management of risk within the Group falls under the remit of the Council of Trustees, who are responsible for the approval of the Group's risk appetite statements, risk framework and risk management strategy, in addition to receiving regular reports on principal risks and how they are evaluated and monitored. The Group Audit and Risk Committee, a joint committee of the Council of Trustees and the Board is responsible for providing oversight of the risk management framework, monitoring its effectiveness and monitoring whether management's response to risks is both adequate and effective in reducing those risks to a level acceptable to the Council.

The Group maintains risk registers which identify and evaluate the likelihood of occurrence and the impact of significant financial, operational, compliance, external and strategic risks. The Leadership Team is responsible for the day-to-day management of key risks and ensuring effective mitigation is in place. With the support of Group Risk they regularly review the principal risks facing the Group. Group Risk continues to work with teams across the organisation to further embed and strengthen our risk management arrangements, to ensure they are operating effectively and provide

Group balance sheet and reserves In total Group reserves increased by **£10.6m** to **£70.2m** at June 2022, reflecting **£1.8m** of net incoming resources from trading activities (after accounting for **£22.2m** of expenditure on our charitable activities). Key points to note from the balance sheet include:

The reduction in intangible assets reflects an impairment in relation to our work to date to improve our digital platforms offset by further investment to continue to make improvements.

The **£0.6m** increase in Investment Property is due to a gain in the change in fair value of the proportion of Marylebone Road that continues to be leased to a third party.

The increase in debtors is largely due to a **£4m** VAT claim in respect of change of VAT treatment on digital subscriptions.

Creditors due after more than one year fell by **£1m** due to the continued repayment of the mortgage balance on Marylebone Road.

There has been an increase in provisions due to a **£2.2m** provision to refund a cohort of members that the Group considers paid more than they needed to in the past.

The defined benefit pension liability is now recognised at zero (2020/21: **£9.6m** liability). The external valuation indicated a **£8.4m** asset, this was not recognised.

**Taxation** In the year, Which? Limited made **£14.6m** (2020/21: **£17.5m**) of gift aid contributions to the Consumers' Association. As the Consumers' Association is a registered charity, no corporation tax was payable on its net outgoing resources.

**Pension schemes** During 2021/22, the Group operated both a defined contribution and a hybrid pension scheme. The hybrid scheme combined the features of defined benefit (final salary) and defined contribution schemes and in March 2019 was closed to future accruals. As at 30 June 2022, the hybrid scheme, valued under the FRS 102 accounting basis, had a **£9.9m** surplus (not recognised), (**£9.6m** liability in 2020/21). During the financial year, the company completed the triennial valuation as at 31 March 2021 and agreed on the revised recovery plan with the pension trustees. The valuation was a **£9.5m** deficit (31 March 2018 – **£10.7m** deficit).

### Third-party relationships

The Council of Trustees continued to adopt six guiding principles to cover relationships with third-party organisations where we receive a commission, referral fees or other benefits, for delivering a commercial service to consumers. These principles can be viewed on our website: [www.which.co.uk/about-which/how we're run](http://www.which.co.uk/about-which/how-we're-run)

### Investment policy

The investment objective is to maintain the real value of the investment portfolio, on a sustainable basis, in accordance with the Council's risk appetite, by investing in a range of assets.

The investment objectives take account of the review of reserves and the Reserves Policy agreed by Council.

This policy should enable the Consumers' Association to meet its investment needs, provide ample liquidity, even in difficult times, and produce higher returns over the long term for re-investment in commercial and charitable activities.

relevant and timely reporting to the Council of Trustees, the Group Audit and Risk Committee and subsidiary boards.

As at the end of 2021/22, the principal risks – those considered material to the achievement of our strategy or future prospects – were identified as outlined below. The Council of Trustees has given consideration to these risks and has satisfied themselves that they are being managed appropriately.

## Financial/commercial affordability

Our financial model relies on us growing and diversifying our consumer audience, at least maintaining and ideally growing the volume of our subscribers, and diversifying our revenue streams, through allowing consumers to complete their buying journey straight from our website and app. This is particularly important at a time where we're seeing an impact on subscriptions as a result of the cost of living crisis. The crisis is also affecting our own operations as we see increased supplier costs, from paper supplies for our magazines, to the energy costs of running our offices. As a result, to mitigate the impact we are planning to draw on our reserves in the coming year to help stimulate future growth, adjusting membership prices and keeping a close eye on our cost base relative to our income. Our digital transformation and brand refresh (read more about this on p25) will also help to ensure our products and services provide an attractive user experience for our members.

## Technology and innovation

Our ability to offer relevant, timely and accessible advice to consumers is contingent on us recruiting and retaining individuals with the right skillsets and capabilities, delivering benefits from new technologies and continuously innovating and improving our ways of working. Our programme to transform key digital systems and processes has continued to see some challenges, but we are now beginning to move beyond these and anticipate seeing the benefits of this work in 2022/23. We continue to invest in recruitment in our technology team, management of key supplier relationships and working in cross-organisational squads to experiment and incrementally improve the experiences we offer.



Press officers Hannah Simms and Jade Juilien sit in our press team, which is responsible for getting Which? news and advice out in national media.

## People and living our values

Having engaged people who live our values in all that they do is very important to us. The current employment markets make this more challenging, but we continue to work on ensuring Which? is recognised as a great place to work in order to retain and attract talented colleagues. We have listened to the needs and feedback of our colleagues, offering greater flexibility in ways of working through our hybrid working model, and greater clarity around reward via regular communications. Creating an inclusive environment to ensure people feel comfortable and empowered to speak and listen up, in turn helps ensure that we continue to live our values, both as colleagues and as an organisation – where we must maintain our independence, put consumers first and not contradict what we stand for.

## Organisational resilience

The Covid-19 pandemic and continued volatility in our external environment remind us of the importance of resilience and the ability to respond to unexpected crisis events. Our business continuity plan ensures we can respond promptly and robustly to such challenges. We also remain mindful of cyber threats and we continue to invest to ensure that our systems and data are adequately protected against misuse, and our people (including all staff, Council and Board members) are regularly trained in cyber security awareness.

## Political and cultural shifts

A number of issues continue to affect businesses and UK consumers, including the impact of the invasion of Ukraine on the UK's economy and evolving societal expectations around sustainability. Further adding to the uncertainty are the ongoing Brexit trade deal discussions and the turmoil seen in the UK's political leadership. Much of this is fuelling the current cost of living crisis, affecting both our own operational costs and the pockets of members and consumers, and in turn their priorities. In order to respond appropriately in this challenging environment, we actively monitor political appetite

and our bandwidth to support policy interventions and seek opportunities to address consumer harm in the areas where we can have the greatest impact. We also seek to apply cost of living, sustainability and diversity and inclusion 'lenses' across all that we do, recognising the continued importance of these issues in consumers' lives.

## Reserves policy

The Council of Trustees' policy is to annually review the Group's reserve levels to ensure they are sufficient:

- Ensuring there is sufficient working capital across the Group;
- Providing some protection against potential risks that could impact the organisation; and
- Offering some flexibility should investment need to be made within the business. All our reserves are unrestricted, with no material amounts designated for specific purposes in future years.

The Council of Trustees anticipates that reserves might be used to fund the Group objectives and the commercial business. Where reserves are used to fund the commercial business, this is expected to benefit the charity's funding in the medium to long term and also contribute to making consumers' lives simpler, fairer and safer.

# Council of Trustees responsibility statement

The Council of Trustees is responsible for preparing the Council of Trustees' report (incorporating Strategic report) and the financial statements in accordance with applicable laws and regulations. Company law requires the Council of Trustees prepare financial statements for each accounting period. Under that law, the Council of Trustees has prepared the financial statements in accordance with the United Kingdom Financial Reporting Standard, comprising FRS 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland, and applicable law (United Kingdom Generally Accepted Accounting Practice)'. Under company law, the Council of Trustees must not approve the financial statements unless it is satisfied that they give a true and fair view of both the Consumers' Association and the Group and of the incoming resources and application of resources including the income and expenditure of the Group for that year.

In preparing these financial statements, Council has:

- selected suitable accounting policies and ensured they have been applied consistently;
- observed the methods and principles in the Statement of Recommended Practice (SORP): Accounting and Reporting by Charities (2019);
- made judgements and accounting estimates that are reasonable and prudent;
- stated whether applicable UK Accounting Standards, comprising FRS 102, have been followed, subject to any material departures disclosed and explained in the financial statements; and
- prepared the financial statements on the going-concern basis.

The Council of Trustees is responsible for ensuring adequate accounting records are kept that are sufficient to show and explain the organisation's transactions and disclose with reasonable accuracy at any time the financial position of the Consumers' Association and the Group and enable it to ensure that the financial statements comply with the Companies Act 2006. It is also responsible for safeguarding the assets of the Consumers' Association and the Group and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities. The Council of Trustees is responsible for the maintenance and integrity of the corporate and financial information included on its website. Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

In accordance with Section 418, directors' reports shall include a statement, in the case of each director in office at the date the directors' report is approved, that:

- so far as the trustee is aware, there is no relevant audit information of which the company's auditors are unaware; and
- the trustees have taken all the steps that they ought to have taken as a trustee in order to make themselves aware of any relevant audit information and to establish that the company's auditors are aware of that information.

## Going-concern

After making enquiries the Council of Trustees has reasonable expectation that the Group has sufficient resources to continue in operational existence for at least 12 months from the date the financial statements were approved.

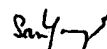
Given that there are no material uncertainties inherent across the Group, the Council of Trustees continues to adopt the going-concern basis in preparing these financial statements. Further information about the adoption of the going-concern basis can be found in the principal accounting policies within the financial statements (page 50).

## Financial statements

Our financial statements are made up of:

- a consolidated statement of financial activities (SOFA); designed specifically for charities, showing the income generated across the Group and how those monies have been spent (p47);
- balance sheets for both the Consumers' Association and the Group, showing the total assets and liabilities as well as total reserves (p48); and
- a consolidated cash flow statement showing how the Group cash balance has changed over the year (p49).

These financial statements, including the Strategic report, comply with the current statutory requirements, the Articles of Association, the Financial Reporting Standard (FRS 102), the Charities Statement of Recommended Practice (SORP) 2019 and the Charities Act 2011. These principal statements are supplemented by extensive notes, providing further insight into the financial performance of the Group, and together form the financial statements of the Group. The Council of Trustees has approved the Trustees Report, incorporating Strategic report. They are signed on its behalf by:



**Sam Younger**  
**Council Chair**

2 Marylebone Road, London NW1 4DF  
5 October 2022

# INDEPENDENT AUDITORS' REPORT

## to the members of Consumers' Association

### REPORT ON THE AUDIT OF THE FINANCIAL STATEMENTS OPINION

In our opinion, Consumers' Association's group financial statements and parent charitable company financial statements (the 'financial statements'):

- give a true and fair view of the state of the group's and of the parent charitable company's affairs as at 30 June 2022 and of its incoming resources and application of resources, including its income and expenditure, and cash flows, for the year then ended;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards, comprising FRS 102 "the Financial Reporting Standard applicable in the UK and Republic of Ireland", and applicable law); and
- have been prepared in accordance with the requirements of the Companies Act 2006.

We have audited the financial statements, included within the Annual report and Financial Statements July 2021–June 2022 (the 'Annual Report'), which comprise: the group and parent charitable company balance sheets as at 30 June 2022; the consolidated statement of financial activities (incorporating an income and expenditure account), and the consolidated cash flow statement for the year then ended; and the notes to the financial statements, which include a description of significant accounting policies.

### BASIS FOR OPINION

We conducted our audit in accordance with International Standards on Auditing (UK) ('ISAs (UK)') and applicable law. Our responsibilities under ISAs (UK) are further described in the Auditors' responsibilities for the audit of the financial statements section of our report. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### Independence

We remained independent of the group and parent charitable company in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, which includes the FRC's Ethical Standard and we have fulfilled our other ethical responsibilities in accordance with these requirements.

### CONCLUSIONS RELATING TO GOING CONCERN

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the group's and the parent charitable company's ability to continue as a going concern for a period of at least twelve months from the date on which the financial statements are authorised for issue.

In auditing the financial statements, we have concluded that the trustees' use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

However, because not all future events or conditions can be predicted, this conclusion is not a guarantee as to the group's and parent charitable company's ability to continue as a going concern.

Our responsibilities and the responsibilities of the trustees with respect to going concern are described in the relevant sections of this report.

### REPORTING ON OTHER INFORMATION

The other information comprises all of the information in the Annual Report other than the financial statements and our auditors' report thereon. The trustees are responsible for the other information. Our opinion on the financial statements does not cover the other information and, accordingly, we do not express an audit opinion or, except to the extent otherwise explicitly stated in this report, any form of assurance thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If we identify an apparent material inconsistency or material misstatement, we are required to perform procedures to conclude whether there is a material misstatement of the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report based on these responsibilities.

Based on our work undertaken in the course of the audit, the Companies Act 2006 requires us also to report certain opinions and matters as described below.

### Council of Trustees' report (incorporating Strategic Report)

In our opinion, based on the work undertaken in the course of the audit the information given in the Council of Trustees' report (incorporating Strategic Report) for the financial year for which the financial statements are prepared is consistent with the financial statements; and the Council of Trustees' report (incorporating Strategic Report) has been prepared in accordance with applicable legal requirements.

In addition, in light of the knowledge and understanding of the group and parent charitable company and their environment obtained in the course of the audit, we are required to report if we have identified any material misstatements in the Council of Trustees' report (incorporating Strategic Report). We have nothing to report in this respect.

## **RESPONSIBILITIES FOR THE FINANCIAL STATEMENTS AND THE AUDIT**

### **Responsibilities of the trustees for the financial statements**

As explained more fully in the Council of Trustees Responsibility Statement, the trustees (who are also the directors of the charitable company for the purposes of company law) are responsible for the preparation of the financial statements in accordance with the applicable framework and for being satisfied that they give a true and fair view. The trustees are also responsible for such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the trustees are responsible for assessing the group's and parent charitable company's ability to continue as a going concern, disclosing as applicable, matters related to going concern and using the going concern basis of accounting unless the trustees either intend to liquidate the group and parent charitable company or to cease operations, or have no realistic alternative but to do so.

### **Auditors' responsibilities for the audit of the financial statements**

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud, is detailed below.

Based on our understanding of the group and/charitable company/industry, we identified that the principal risks of non-compliance with laws and regulations related to the Companies Act 2006 and the Charities Act 2011, and we considered the extent to which non-compliance might have a material effect on the financial statements. We also considered those laws and regulations that have a direct impact on the financial statements such as the Companies Act 2006. We evaluated management's incentives and opportunities for fraudulent manipulation of the financial statements (including the risk of override of controls), and determined that the principal risks were related to posting inappropriate journal entries to manipulate financial results and management bias in accounting estimates. Audit procedures performed included:

- identifying and testing journal entries, in particular those entries posted with unusual account combinations;
- enquiry of management including consideration of known or suspected instances of non-compliance with laws and regulations and fraud;
- reading minutes of meetings of the group Audit and Risk Committee and related governance bodies of the Group and charitable company; and
- assessing financial statement disclosures, and testing to supporting documentation, for compliance with applicable laws and regulations.

There are inherent limitations in the audit procedures described above. We are less likely to become aware of instances of non-compliance with laws and regulations that are not closely related to events and transactions reflected in financial statements. Also, the risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error, as fraud may involve deliberate concealment by, for example, forgery or intentional misrepresentations or through collusion.

A further description of our responsibilities for the audit of the financial statements is located on the FRC's website at: [www.frc.org.uk/auditorsresponsibilities](http://www.frc.org.uk/auditorsresponsibilities). This description forms part of our auditors' report.

### **Use of this report**

This report, including the opinions, has been prepared for and only for the charity's members as a body in accordance with Chapter 3 of Part 16 of the Companies Act 2006 and for no other purpose. We do not, in giving these opinions, accept or assume responsibility for any other purpose or to any other person to whom this report is shown or into whose hands it may come save where expressly agreed by our prior consent in writing.

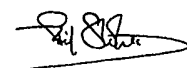
## **OTHER REQUIRED REPORTING**

### **COMPANIES ACT 2006 EXCEPTION REPORTING**

Under the Companies Act 2006 we are required to report to you if, in our opinion:

- we have not obtained all the information and explanations we require for our audit; or
- adequate accounting records have not been kept by the parent charitable company or returns adequate for our audit have not been received from branches not visited by us; or
- certain disclosures of trustees' remuneration specified by law are not made; or
- the parent charitable company financial statements are not in agreement with the accounting records and returns.

We have no exceptions to report arising from this responsibility.



Philip Stokes (Senior Statutory Auditor)  
for and on behalf of PricewaterhouseCoopers LLP  
Chartered Accountants and Statutory Auditors  
London  
5 October 2022

# CONSOLIDATED STATEMENT OF FINANCIAL ACTIVITIES

For the year ended 30 June 2022

Incorporating a consolidated income and expenditure account

	Notes	Group Total 2021/22 £'000	Group Total 2020/21 £'000
<b>Income from</b>			
Incoming from trading activities		85,537	88,052
Research income		324	289
Investment income		459	425
Other income		353	108
<b>Total income</b>		<b>86,673</b>	<b>88,874</b>
<b>Expenditure on</b>			
Raising funds:			
Trading costs	2	(62,554)	(60,923)
Interest payable and other similar charges	2, 6	(111)	(146)
Charitable activities:			
Consumer research	2	(11,248)	(11,441)
Promoting consumer interests	2	(10,950)	(12,108)
<b>Total expenditure</b>		<b>(84,863)</b>	<b>(84,618)</b>
<b>Net income before gain on investments</b>		<b>1,810</b>	<b>4,256</b>
<b>Net gain from changes in fair value of investment property</b>	11	<b>590</b>	<b>-</b>
<b>Realised gains on investments</b>		<b>-</b>	<b>651</b>
<b>Net incoming resources before other comprehensive income/(expense)</b>		<b>2,400</b>	<b>4,907</b>
Unrealised (losses)/gains on investments	12	(249)	4,148
Actuarial gains/(losses) on defined benefit pension schemes	22	8,400	(1,800)
<b>Net movement in funds</b>	5	<b>10,551</b>	<b>7,255</b>
<b>Reconciliation of funds</b>			
Total funds brought forward at the beginning of the reporting year		59,661	52,406
<b>Total funds carried forward at the end of the reporting period</b>		<b>70,212</b>	<b>59,661</b>

The consolidated statement of financial activities includes all gains and losses in the year.

There is no difference between net incoming resources and its historical cost equivalent in the current and prior year.

The figures above relate entirely to continuing operations.

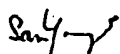
Note: All funds of the charity are unrestricted.

# BALANCE SHEETS

As at 30 June 2022

	Notes	Group		Consumers' Association	
		2022 £'000	2021 £'000	2022 £'000	2021 £'000
<b>Fixed assets</b>					
Intangible assets	9	2,813	4,098	111	177
Tangible assets	10	23,819	24,475	23,172	23,706
Investment property	11	3,770	3,180	3,770	3,180
Investments	12	37,671	37,540	37,671	37,540
Investments in subsidiary and associated undertakings	13	52	52	20,052	20,052
		68,125	69,345	84,776	84,655
<b>Current assets</b>					
Debtors	15	12,574	6,661	7,109	5,435
Cash at bank and in hand		10,889	13,803	703	(79)
		23,463	20,464	7,812	5,356
<b>Creditors: Amounts falling due within one year</b>	16	(16,569)	(16,364)	(6,223)	(6,063)
<b>Net current assets/(liabilities)</b>		6,894	4,100	1,589	(707)
<b>Total assets less current liabilities</b>		75,019	73,445	86,365	83,948
Creditors: Amounts falling due after more than one year	17	(2,466)	(3,416)	(2,466)	(3,416)
Provisions	18	(2,341)	(768)	-	(290)
<b>Net assets before defined benefit pension scheme liability</b>		70,212	69,261	83,899	80,242
Defined benefit pension scheme liability	22	-	(9,600)	-	(9,600)
<b>Net assets</b>		70,212	59,661	83,899	70,642
Accumulated surplus	21	76,434	74,034	90,121	85,015
Revaluation reserve	21	10,478	10,727	10,478	10,727
Pension reserve	21	(16,700)	(25,100)	(16,700)	(25,100)
<b>Total unrestricted funds being total funds</b>		70,212	59,661	83,899	70,642

The financial statements on pages 47 to 65 of the Consumers' Association (registered number 00580128, charity number 296072) were approved by the Council of Trustees and authorised for issue on 5 October 2022. They were signed on its behalf by:



**Sam Younger**  
Council Chair



# CONSOLIDATED CASH FLOW STATEMENT

for the year ended 30 June 2022

	2021/22		2020/21	
	£'000	£'000	£'000	£'000
<b>Cash flows from operating activities</b>				
<b>Net cash provided by operating activities (see below)</b>		412		5,640
<b>Cash flows from investing activities</b>				
Income from investments	459		425	
Interest paid	(111)		(146)	
Purchase of intangible fixed assets	(1,821)		(1,728)	
Purchase of tangible fixed assets	(523)		(34)	
Purchase of investments	(385)		(1,980)	
Sale of investments	-		940	
Net realised gain on sale of investments	-		651	
Decrease/(increase) in deposits awaiting investment	5		(4)	
<b>Net cash used in investing activities</b>		(2,376)		(1,876)
<b>Cash flows from financing activities</b>				
Repayments of borrowing	(950)		(1,333)	
<b>Net cash used in financing activities</b>		(950)		(1,333)
<b>Change in cash and cash equivalents in the reporting year</b>		(2,914)		2,431
<b>Cash and cash equivalents at the beginning of the reporting year</b>		13,803		11,372
<b>Cash and cash equivalents at the end of the reporting year</b>		10,889		13,803
<b>Reconciliation of net movements in funds to net cash provided by operating activities</b>				
<b>Net incoming resources before other comprehensive income/(expense) (as per the consolidated statement of financial activities)</b>		2,400		4,907
<b>Adjustments for:</b>				
Amortisation charged		1,314		555
Depreciation charged		1,178		1,433
Written off intangible assets		1,034		-
Loss on disposal of intangible assets		758		3
Loss on disposal of tangible assets		1		225
(Increase)/decrease in debtors		(5,913)		627
Increase in creditors falling due within one year		205		701
Increase in provisions		1,573		219
Adjustment for pension funding		(1,200)		(2,100)
Interest paid		111		146
Income from investments		(459)		(425)
Realised gain on sales of investments		-		(651)
Gains from change in fair value on Investment Property		(590)		-
<b>Net cash provided by operating activities</b>		412		5,640

# NOTES TO THE FINANCIAL STATEMENTS

## 1 PRINCIPAL ACCOUNTING POLICIES AND OTHER INFORMATION

### GENERAL INFORMATION AND STATEMENTS OF COMPLIANCE

Consumers' Association (CA) is a registered charity (No 296072) and a private company limited by guarantee. It is registered in the United Kingdom (No 00580128) and its registered office is at 2 Marylebone Road, London, NW1 4DF.

The financial statements have been prepared in accordance with applicable accounting standards in the United Kingdom, including Financial Reporting Standard 102 – 'The Financial Reporting Standard applicable in the United Kingdom and Republic of Ireland' ('FRS 102'), and with the Companies Act 2006. They also conform to the recommendations contained in the Statement of Recommended Practice: Accounting and Reporting by Charities issued by the Charity Commission, published in 2019 (SORP FRS 102), together with the reporting requirements of the Charities Act 2011 (for charities registered in England and Wales and dual registered charities).

A summary of the principal accounting policies has been set out below. These policies have been consistently applied to all years presented, unless otherwise stated.

### BASIS OF ACCOUNTING

CA meets the definition of a public benefit entity under FRS 102. The financial statements have been prepared under the historical cost convention unless otherwise stated in the relevant accounting policy note.

The preparation of financial statements requires the use of certain critical accounting estimates. It also requires management to exercise its judgements in the process of applying the Group and charity accounting policies.

CA has taken advantage of the following exemptions:

- From preparing a statement of cash flows, on the basis that it is a qualifying entity. The consolidated statement of cash flows, within the financial statements, includes the CA's cash flows;
- From the financial instrument disclosures, required under FRS 102 paragraphs 11.39 to 11.48A and paragraphs 12.26 to 12.29, as the information is provided in the consolidated financial statement disclosures; and
- From presenting a parent company Statement of Financial Activities, as permitted by section 408 of the Companies Act 2006.

### BASIS OF CONSOLIDATION

The Group financial statements consolidate the financial statements of all Group companies for the year to 30 June 2022, with the statement of financial activities (SOFA) and balance sheet being consolidated on a line-by-line basis. Transactions between Group companies are eliminated on consolidation in the SOFA.

A subsidiary is an entity controlled by the Group. Control is the power to govern the financial and operating policies of an entity so as to obtain benefits from its activities.

Where a subsidiary has different accounting policies to the Group, adjustments are made to those subsidiary financial statements to apply Group accounting policies when preparing the consolidated financial statements.

### INCOME

Income represents the sales value of goods and services supplied excluding value added tax (where applicable) and sales between

Group companies. The directors are of the opinion that substantially all of the Group's income originates in the United Kingdom and is from the same class of business. All income is recognised on the accruals basis of accounting.

Subscription revenue on magazines is recognised when the related product is dispatched to the customer. Subscription revenue on services is recognised in relation to the time period the payment applies. Subscriptions received in advance of the product or service being received by the customer are treated as current liabilities (subscriptions received in advance), while revenue relating to products or services received by the customer before payment is treated as accrued subscriptions within debtors. Income from links with affiliates and comparison sites is accrued on a monthly basis when information is received from the affiliate traffic on subsequent activity or payment.

Revenue relating to the Best Buy endorsement scheme and wills is recognised at the point the service is provided.

Commission on other fees, including the referral of life insurance, is recognised when the associated work has been completed and consideration can be reliably measured.

Rental income from operating leases (net of any incentives given to the lessees) is recognised on a straight-line basis over the lease term.

### EXPENDITURE

All expenditure is recognised in the year in which it is incurred in the categories of:

- Expenditure on raising funds: primarily costs within our commercial activities; and
- Charitable activities: expenditure where the primary intention is to:
  1. support or improve the management or administration of the Consumers' Association, or
  2. directly further one of the Consumers' Association's charitable purposes, see page 14. They are categorised into the following headings:
    - Consumer research: these costs relate to rigorous testing and analysis, investigative research and subject expertise that we turn into news, reviews, practical tools and advice.
    - Promoting consumer interests: costs in relation to publishing free content for consumers and our advocacy work, including improving understanding of, and promoting compliance with, consumer laws, regulations and public policies. This includes our policy work, influencing businesses and policymakers external affairs, and campaigns activity to make life fairer, simpler and safer for consumers.

Wherever possible, expenditure by the charity is attributed specifically to the purpose for which it is incurred. Any mixed purpose expenditure is allocated between cost categories using the most appropriate metric (e.g. page views, time spent, number of staff).

Expenditure comprises direct costs (including attributable staff costs) and an appropriate apportionment of support costs (which include shared costs such as finance, in-house legal, information technology and human resources costs). Support costs are allocated to ensure the indirect costs of products are recovered. The basis for this allocation is the average number of staff in the year.

## 1 PRINCIPAL ACCOUNTING POLICIES AND OTHER INFORMATION continued

### INTANGIBLE ASSETS

Intangible assets are measured at cost less accumulated amortisation and any provision for impairment. Amortisation is calculated on assets in order to write off their cost less residual value in equal instalments over their estimated useful lives. Assets are capitalised if the cost exceeds £10,000 and are considered to have a useful life of more than one year.

An impairment indicator assessment is conducted on an annual basis and any asset found to have a carrying value materially higher than its recoverable amount is written down accordingly.

Asset lives are estimated as follows:

- Software: 1-5 years

These useful lives are reviewed on an annual basis.

Derecognition: Intangible assets are derecognised on disposal or when no future economic benefits are expected.

### TANGIBLE ASSETS

Tangible assets, other than investment properties, are measured at cost less accumulated depreciation and any provision for impairment. Depreciation is calculated on assets in order to write off their cost less residual value in equal instalments over their estimated useful lives. Assets are capitalised if the cost exceeds £10,000 and are considered to have a useful life more than one year.

An impairment indicator assessment is conducted on an annual basis and any asset found to have a carrying value materially higher than its recoverable amount is written down accordingly.

Asset lives are estimated as follows:

- Long-term leasehold premises (2 Marylebone Road): remainder of lease (91 years)
- Fixtures, fittings and equipment: 1-10 years

These useful economic lives are reviewed on an annual basis.

Derecognition: Tangible assets are derecognised on disposal or when no future economic benefits are expected.

### INVESTMENT PROPERTY

Investment property is carried at fair value determined annually by external valuers and derived from the current market rents and investment property yields for comparable real estate, adjusted if necessary for any difference in the nature, location or condition of the specific asset. No depreciation is provided. Material changes in fair value are recognised in the SOFA in addition to an estimate on usage of communal spaces.

### INVESTMENTS

Investments held as assets are revalued to bid value as at the balance sheet date. Realised and unrealised gains and losses arising from the revaluation of the investment portfolio in the year are included in net gains on investments in the SOFA.

### INVESTMENTS IN SUBSIDIARY AND ASSOCIATED UNDERTAKINGS

Investments in subsidiary and associated companies are valued at cost. When the directors consider a subsidiary to have suffered a permanent diminution in value, an appropriate adjustment is made to the value of the investment in the financial statements, to reflect its recoverable amount.

### PROVISIONS

A provision is recognised in the balance sheet when there is a present legal or constructive obligation as a result of a past event, and it is probable that an outflow of economic benefit will be required to settle the obligation.

### BORROWING COSTS

All borrowing costs are recognised in the SOFA in the period in which they are incurred.

### FINANCIAL INSTRUMENTS

The Company has chosen to adopt Sections 11 and 12 of FRS 102 in respect of financial instruments.

Basic financial assets, including trade and other receivables, cash and bank balances and investments are initially recognised at transaction price, unless the arrangement constitutes a financial transaction. In this case the transaction is measured at the present value of the future receipts discounted at a market rate of interest. Such assets are subsequently carried at amortised cost, using the effective interest method.

Basic financial liabilities, including trade and other payables, bank loans and loans from fellow Group companies, are initially recognised at transaction price, unless the arrangement constitutes a financial transaction. In this case the transaction is measured at the present value of the future receipts discounted at a market rate of interest.

Debt instruments are subsequently carried at amortised cost using the effective interest rate method.

Derivatives, including interest rate swaps, are not basic financial instruments. Derivatives are initially recognised at fair value on the date a derivative contract is entered into and are subsequently re-measured at their fair value. Changes in the fair value of the derivatives are recognised in the SOFA within investment income.

Financial liabilities are derecognised when the liability is extinguished, that is when the contractual obligation is discharged, cancelled or expired.

### DEBTORS

Debtors are stated initially at fair value less impairment losses. A provision for impairment of debtors is established when there is objective evidence that the Group will not be able to collect amounts due.

### CASH AND CASH EQUIVALENTS

Cash and cash equivalents includes cash in hand, and deposits held on call with banks.

### RELATED PARTY TRANSACTIONS

The Group discloses transactions with related parties which are not wholly owned within the same Group. Where appropriate, transactions of a similar nature are aggregated unless, in the opinion of the Trustees, separate disclosure is necessary to understand the effect of the transactions on the Group financial statements.

### EMPLOYEE BENEFITS

Short-term benefits, including holiday pay and other non-monetary benefits, are recognised as expenditure in the period in which the service is received.

## 1 PRINCIPAL ACCOUNTING POLICIES AND OTHER INFORMATION continued

### PENSION COSTS

The Group operates a pension scheme with two sections: a hybrid and a defined contribution scheme. The hybrid scheme combines the features of both defined benefit and defined contribution schemes, providing benefits based on the higher of a final salary pension and a money purchase pension. The hybrid scheme was closed to new entrants on 1 April 2004 and to future accrual on 31 March 2019.

For the hybrid scheme, the amounts charged in total expenditure are the current service costs and gains and losses on settlements and curtailments. They are included as part of staff costs. Past service costs have been recognised immediately in the SOFA if the benefits have vested. If the benefits have not vested immediately, the costs are recognised over the period until vesting occurs. Under FRS 102, a net interest expense is calculated by applying the discount rate to the net defined benefit liability and is recognised in the SOFA. Actuarial gains and losses are recognised immediately in 'Other comprehensive income'.

Our hybrid scheme is funded, with the assets of the scheme held separately from those of the Group, in separate funds administered by the scheme Trustees. Pension scheme assets are measured at fair value and liabilities are measured on an actuarial basis using the projected unit method and discounted at a rate equivalent to the current rate or return on a high-quality corporate bond of equivalent currency and term to the scheme liabilities.

The actuarial valuations are obtained at least triennially and are updated for FRS 102 purposes at each balance sheet date. The resulting defined benefit asset or liability, net of the related deferred tax is presented separately on the face of the balance sheet. Hybrid scheme assets are recognised only to the extent that the surplus can be recovered, either through reduced contributions in the future or through refunds from the scheme.

For the defined contribution scheme, the amount charged to the SOFA in respect of pension costs and other post-retirement benefits is the total of contributions payable in the year. Differences between contributions payable in the year and contributions actually paid are shown as either accruals or prepayments in the balance sheet. The rules of the scheme state that any balance of the fund remaining after all benefits have been secured may be paid to the employers in the proportions decided by the Trustees after consulting the Actuary. The company believes that securing benefits through an insurance policy would utilise all of the surplus calculated as at the balance sheet date, further the company is not able to anticipate the behaviour of the trustees should the scheme meet benefits as they fall due and a surplus remains. As such no recognition of any surplus in the scheme is recognised until the receipt of the such surplus is considered probable when applying the rules of the scheme, including application of trustees' discretions.

### CRITICAL ACCOUNTING JUDGEMENTS AND ESTIMATION UNCERTAINTY

The Group has to make judgements in applying its accounting policies which affect the amounts recognised in the financial statements. In addition, estimates and assumptions are made that could affect the reported amounts of assets and liabilities within the financial year. The most significant areas where judgement and estimates are disclosed are in the following notes:

- Useful life of assets: notes 9 and 10.
- Valuation of investment property: note 11.
- VAT: note 15

- Provisions: note 18.
- Pension costs: note 22.

### OPERATING LEASES

Leases that do not transfer over the risks and reward of ownership are classified as operating leases. The cost of operating leases is charged to the SOFA in equal instalments over the period of the lease.

### FOREIGN EXCHANGE

The Group financial statements are presented in pound sterling and rounded to the nearest thousand. The Group's functional and presentational currency is pound sterling.

Transactions denominated in foreign currencies are translated into sterling at the rates ruling at the date of the transactions. Monetary assets and liabilities denominated in foreign currencies at the balance sheet date are retranslated at the rates ruling at that date. These translation differences are accounted for in the SOFA.

### IRRECOVERABLE VAT

Any irrecoverable VAT is charged to the SOFA, or capitalised as part of the cost of the related asset where appropriate.

### TAXATION

The activities of the charity are exempt from the liability to taxation which fall within the scope of Part 11 of the Corporation Tax Act 2010. No current tax liability arose in respect of the trading subsidiary (Which? Limited) because it made or is expected to make a gift aid payment to the charity within the allowable time frame post year end equal to its taxable profit after any applicable Group relief.

Deferred taxation in the subsidiary is provided in full on timing differences that result in an obligation at the balance sheet date to pay more tax, or a right to pay less tax, at a future date, at rates expected to apply when they crystallise based on current tax rates and law. Timing differences arise from the inclusion of items of incoming resources and resources expended in taxation computations in periods different from those in which they are included in financial statements. Deferred tax assets are recognised to the extent that it is regarded as more likely than not that they will be recovered. Deferred tax assets and liabilities are not discounted.

### GOING CONCERN

The Group's business activities, together with the factors likely to affect its future development performance and position are set out in the Council of Trustees' report. The Group is funded primarily by retained earnings and has significant cash reserves and liquid investments. The Group generates the majority of its cash in the form of subscription income and does not rely on external funding for day-to-day working capital requirements. The external mortgage partially funded the Marylebone Road headquarters redevelopment.

After making enquiries and taking into consideration the impact of Covid-19 on our customers and our operations, the Council of Trustees has a reasonable expectation that the Group has adequate resources to continue in operational existence for the foreseeable future. Accordingly, it continues to adopt the going concern basis in preparing the annual report and financial statements.

## 2 TOTAL EXPENDITURE

	Direct costs £'000	Support costs £'000	Total 2021/22 £'000	Total 2020/21 £'000
<b>Raising funds</b>				
Cost of sales	(24,023)	-	(24,023)	(21,777)
Distribution costs	(6,540)	-	(6,540)	(6,949)
Other trading expenditure	(20,384)	(11,607)	(31,991)	(32,197)
<b>Total fundraising trading costs</b>	<b>(50,947)</b>	<b>(11,607)</b>	<b>(62,554)</b>	<b>(60,923)</b>
Interest payable and other similar charges	-	(111)	(111)	(146)
<b>Charitable activities</b>				
Consumer research	(8,344)	(2,904)	(11,248)	(11,441)
Promoting consumer interests	(8,501)	(2,449)	(10,950)	(12,108)
<b>Total expenditure</b>	<b>(67,792)</b>	<b>(17,071)</b>	<b>(84,863)</b>	<b>(84,618)</b>

## 3 SUPPORT COSTS

	Management £'000	Finance & Legal £'000	Information Technology £'000	Human Resources £'000	Direct Support costs £'000	Total 2021/22 £'000	Total 2020/21 £'000
<b>Raising funds</b>							
Other trading expenditure	(206)	(3,205)	(2,345)	(4,072)	(1,779)	(11,607)	(12,235)
Interest payable and other similar charges	-	-	-	-	(111)	(111)	(146)
<b>Charitable activities</b>							
Consumer research	(231)	(843)	(505)	(734)	(591)	(2,904)	(3,041)
Promoting consumer interests	(193)	(703)	(421)	(612)	(520)	(2,449)	(2,719)
<b>Total expenditure</b>	<b>(630)</b>	<b>(4,751)</b>	<b>(3,271)</b>	<b>(5,418)</b>	<b>(3,001)</b>	<b>(17,071)</b>	<b>(18,141)</b>

Included in the support costs above are governance costs of £764k (2020/21: £840k).

#### 4 RESULTS FROM TRADING ACTIVITIES OF SUBSIDIARIES

	Which? Limited 2021/22 £'000	Which? Limited 2020/21 £'000	Which? Financial Services Limited 2021/22 £'000	Which? Financial Services Limited 2020/21 £'000
<b>Profit &amp; Loss Account</b>				
Turnover	85,341	87,923	196	207
Other net expenditure	(73,555)	(72,184)	(129)	(141)
<b>Underlying trading profit</b>	<b>11,786</b>	<b>15,739</b>	<b>67</b>	<b>66</b>
<b>Balance sheet</b>				
Total assets	23,471	22,976	-	1,107
Total liabilities	(17,157)	(14,909)	-	(154)
<b>Total funds</b>	<b>6,314</b>	<b>8,067</b>	<b>-</b>	<b>953</b>

Which? Limited provided education, information and advice to the benefit of consumers through the subscription to Which? products and services, and also operated the Which? Trusted Trader and Which? Legal services. It also received income from businesses that were licensed to use the Which? endorsement with relevant 'Best Buy' products and services, and affiliate income.

During the year, the remaining trade and assets of Which? Financial Services Limited were transferred to Which? Limited. Which? Financial Services Limited is dormant at 30 June 2022.

#### 5 NET MOVEMENT IN FUNDS

	2021/22 £'000	2020/21 £'000
<b>Net movement of funds is stated after charging</b>		
Net movement in funds is stated after charging:		
Amortisation of intangible assets	(1,314)	(555)
Depreciation of tangible assets	(1,178)	(1,433)
Written off intangible assets	(1,034)	-
Loss on disposal of intangible assets	(758)	(3)
Loss on disposal of tangible assets	(1)	(225)
Expenses of the Council of Trustees*	(2)	-
Cost of liability insurance for Council of Trustees	(9)	(7)
<b>Payment under operating leases charged to the SOFA:</b>	<b>(435)</b>	<b>(674)</b>
<b>The analysis of auditors' remuneration for the audit of the Company's annual financial statements</b>		
Fees payable to the Company's auditor for the audit of the Company's annual financial statements		
The audit of CA	(57)	(54)
Fees payable to the Company's auditor and their associates for other services to the Group		
The audit of the Company's subsidiaries pursuant to legislation	(68)	(66)
<b>Total audit fees</b>	<b>(125)</b>	<b>(120)</b>
<b>Tax services</b>	<b>(19)</b>	<b>(14)</b>
<b>Total non-audit fees</b>	<b>(19)</b>	<b>(14)</b>

\* Members of Council do not receive any payment for their services.

## 6 INTEREST PAYABLE AND OTHER SIMILAR CHARGES

	2021/22 £'000	2020/21 £'000
Interest on mortgage	76	59
Investment management charges	35	29
Fees for refinancing	-	58
<b>Total interest payable and other similar charges</b>	<b>111</b>	<b>146</b>

Fees for refinancing includes legal work on the mortgage renewal.

## 7 EMPLOYEES

	Total 2021/22 £'000	Total 2020/21 £'000
<b>Employee costs during the year amounted to:</b>		
Salaries and wages	32,058	30,495
Social security	3,609	3,345
Pension costs	3,030	2,926
Compensation for loss of office	211	456
Benefits in kind	968	803*
<b>Total</b>	<b>39,876</b>	<b>38,025</b>

\*Restated from £543k

	Total 2021/22 number of employees	Total 2020/21 number of employees
<b>The average monthly number of employees of the Group during the year was:</b>		
Consumer research	96	89
Promoting consumer interests	75	77
Support activities	119	109
Trading activities	389	374
<b>Total</b>	<b>679</b>	<b>649</b>

## 7 EMPLOYEES continued

The numbers of employees of the Group who received emoluments in excess of £60,000 in the year were:

	Total number of employees 2021/22	Total number of employees 2020/21
£60,001-£70,000	68	59
£70,001-£80,000	39	22
£80,001-£90,000	20	26
£90,001-£100,000	15	11
£100,001-£110,000	12	8
£110,001-£120,000	3	4
£120,001-£130,000	3	3
£130,001-£140,000	-	4
£140,001-£150,000	1	1
£160,001-£170,000	-	1
£170,001-£180,000	4	3
£180,001-£190,000	-	1
£190,001-£200,000	1	1
£200,001-£210,000	1	2
£210,001-£220,000	1	1
£220,001-£230,000	1	-
£230,001-£240,000	2	2
£250,001-£260,000	-	1
£350,001-£360,000	1	-
£370,001-£380,000	-	1



## 7 EMPLOYEES continued

	Total 2021/22 £'000	Total 2020/21 £'000
<b>Key employees</b>		
<b>Employee costs during the year amounted to:</b>		
Salaries and wages	1,884	2,063
Pension costs	140	137
Compensation for loss of office	-	20
Benefits in kind	5	1
<b>Total</b>	<b>2,029</b>	<b>2,221</b>

Key employee costs in 2021/22 relate primarily to 9 (2020/21: 10) employees in the Leadership Team.

## 8 TAXATION

Consumers' Association is a registered charity, and is therefore exempt from the liability to taxation on its current activities which fall within the scope of Part 11 of the Corporation Taxes Act 2010. No taxation, either current or deferred, arose in respect of any subsidiary company of the Consumers' Association.

## 9 INTANGIBLE ASSETS

	Software £'000		Software £'000
<b>Group</b>		<b>Consumers' Association</b>	
Cost or valuation		Cost or valuation	
At 1 July 2021	9,420	At 1 July 2021	685
Additions	1,821	Additions	47
Disposals	(836)	Disposals	(78)
<b>At 30 June 2022</b>	<b>10,405</b>	<b>At 30 June 2022</b>	<b>654</b>
Accumulated amortisation		Accumulated amortisation	
At 1 July 2021	5,322	At 1 July 2021	508
Amortisation charged	1,314	Amortisation charged	113
Written off	1,034	Disposals	(78)
Disposals	(78)		
<b>At 30 June 2022</b>	<b>7,592</b>	<b>At 30 June 2022</b>	<b>543</b>
Net book value		Net book value	
At 30 June 2021	4,098	At 30 June 2021	177
<b>At 30 June 2022</b>	<b>2,813</b>	<b>At 30 June 2022</b>	<b>111</b>

## 10 TANGIBLE ASSETS

	Long-term leasehold premises £'000	Fixtures fittings & equipment £'000	Total £'000
<b>Group</b>			
Cost or valuation			
At 1 July 2021	29,534	5,952	35,486
Additions	113	410	523
Disposals	-	(84)	(84)
<b>At 30 June 2022</b>	<b>29,647</b>	<b>6,278</b>	<b>35,925</b>
Accumulated depreciation			
At 1 July 2021	6,963	4,048	11,011
Depreciation charged	506	672	1,178
Disposals	-	(83)	(83)
<b>At 30 June 2022</b>	<b>7,469</b>	<b>4,637</b>	<b>12,106</b>
Net book value			
At 30 June 2021	22,571	1,904	24,475
<b>At 30 June 2022</b>	<b>22,178</b>	<b>1,641</b>	<b>23,819</b>

	Long-term leasehold premises £'000	Fixtures fittings & equipment £'000	Total £'000
<b>Consumers' Association</b>			
Cost or valuation			
At 1 July 2021	29,534	4,604	34,138
Additions	113	410	523
Disposals	-	(84)	(84)
<b>At 30 June 2022</b>	<b>29,647</b>	<b>4,930</b>	<b>34,577</b>
Accumulated depreciation			
At 1 July 2021	6,963	3,469	10,432
Depreciation charged	506	550	1,056
Disposals	-	(83)	(83)
<b>At 30 June 2022</b>	<b>7,469</b>	<b>3,936</b>	<b>11,405</b>
Net book value			
At 30 June 2021	22,571	1,135	23,706
<b>At 30 June 2022</b>	<b>22,178</b>	<b>994</b>	<b>23,172</b>

'Long-term leasehold premises' represents the Consumers' Association's property at 2 Marylebone Road, London.

The property of the Consumers' Association, together with associated fixtures and fittings and equipment were used both by staff employed by the charity and by its trading subsidiaries. An appropriate proportion of the operating cost is shared by each company, but it is not considered practicable to divide the value of the assets between those used by the charity for its own purposes and those used for trading. All tangible assets are stated at historical cost less depreciation and impairments.

## 11 INVESTMENT PROPERTY

2 Marylebone Road £'000		2 Marylebone Road £'000	
Group		Consumers' Association	
Fair value		Fair value	
At 1 July 2021	3,180	At 1 July 2021	3,180
Net gain from change in fair value	590	Net gain from change in fair value	590
<b>Balance at 30 June 2022</b>	<b>3,770</b>	<b>Balance at 30 June 2022</b>	<b>3,770</b>

### Investment property

The Group's investment property represents 13% (2021: 12%) of the value of 2 Marylebone Road, London, due to the proportion of the value (including shared area) being leased to a tenant from March 2021. The property was valued at fair value on 30 June 2022, in accordance with Section 119 of the Charities Act 2011 by an independent, professionally qualified RICS valuer. Details on the assumptions made and the key methodology applied in determining the fair value of the investment property are given in note 1.

The surplus on revaluation of investment property arising of £590k (2021: £77k) has been credited to the statement of financial activities in the year.

## 12 INVESTMENTS

	Deposits awaiting investment £'000	Market value of investments £'000	Total £'000
Balance at 1 July 2021	38	37,502	37,540
Income from investments	459	-	459
Purchases during the year	(385)	385	-
Cash withdrawal	(62)	-	(62)
Unrealised loss on investments	-	(249)	(249)
Charges	(17)	-	(17)
<b>Balance at 30 June 2022</b>	<b>33</b>	<b>37,638</b>	<b>37,671</b>
<b>Historical cost</b>			
At 30 June 2021		26,952	
At 30 June 2022		27,336	

Fixed asset investments consist of direct holdings in Exchange Traded Funds which track International Equities and hold short-term UK corporate bonds.

Investments in a security exceeding 5% of the total value of the portfolio:

iShares Core MSCI World UCITS ETF	52.6%
iShares £ Corp Bond 0-5yr UCITS ETF	19.2%
Charities Property Fund	16.9%

### 13 INVESTMENTS IN SUBSIDIARY AND ASSOCIATED UNDERTAKINGS

Subsidiary undertakings	Holding	Proportion owned	Principal activity
<b>Direct holdings of CA</b> Which? Limited	Ordinary shares	100%	Publishing
<b>Indirect holdings of CA</b> Which? Financial Services Limited	Ordinary shares	100%	Insurance broking (Dormant at 30 June 2022)
Which? Legal Limited	Ordinary shares	100%	Dormant
<b>Other investments</b> <b>Direct holdings of CA</b> International Consumer Research and Testing Limited	'A' Ordinary shares	17%	Consumer research on international basis

The registered office for all subsidiary undertakings is 2 Marylebone Road, London NW1 4DF.

Shares in subsidiary and associated companies	Group £'000	Consumers' Association £'000
<b>Cost and net book value</b> At 1 July 2021	52	20,052
<b>At 30 June 2022</b>	52	20,052

## 14 RELATIONSHIPS

### POLITICAL AND CHARITABLE CONTRIBUTIONS AND RELATED PARTY TRANSACTIONS

No political donations were made during the year (2020/21: £nil). Total charitable donations were £75k (2020/21: £76k).

### RESEARCH INSTITUTE FOR DISABLED CONSUMERS (RIDC)

Consumers' Association made a donation of £75k during the year to the registered charity, RIDC (2020/21: £75k), representing a general grant to cover operating expenses. Both a Council Trustee and an employee of the Consumers' Association are Trustees of RIDC. The donation received from the Consumers' Association represented a material proportion of RIDC's own income.

### INTERNATIONAL CONSUMER RESEARCH AND TESTING LIMITED (ICRT)

During the year, the Consumers' Association paid £127k (2020/21: £123k) in membership fees to ICRT. In addition, a further £1,200k (2020/21: £1,300k) was paid in respect of research and product testing. ICRT has one board member in common with Which? Limited. The amount payable to ICRT at 30 June 2022 was £77k (30 June 2021: £563k).

### CONSUMERS INTERNATIONAL (CI)

Throughout the year, the Consumers' Association was a member of CI, the international federation of consumer organisations. Consumers' Association contributes a significant proportion of CI's non-grant income and a CA employee serves on the governing council of CI. During the year the Consumers' Association paid £258k (2020/21: £281k) in membership fees.

### BUREAU EUROPÉEN DES UNIONS DE CONSOMMATEURS (BEUC)

Throughout the year, the Consumers' Association was a member of BEUC, the pan-European federation of consumer organisations. Consumers' Association contributes a significant proportion of BEUC's non-grant income. During the year, the Consumers' Association paid £355k (2020/21: £465k) in membership fees.

### COUNCIL TRUSTEES

There were no material transactions with Council Trustees, their close families or parties with whom Council Trustees are related, other than those disclosed above as per the definition of the related party accounting standard. Council Trustees do not receive any payment for their services (2020/21: £nil). They are reimbursed for travel and accommodation expenses incurred in the performance of their duties and the Consumers' Association purchased indemnity insurance to protect Council Trustees (see note 5).

## 15 DEBTORS

	Group		Consumers' Association	
	2022	2021	2022	2021
	£'000	£'000	£'000	£'000
Trade debtors	1,869	853	294	14
Amounts due from Group undertakings	-	-	4,435	4,270
Other debtors	665	21	653	10
Prepayments and accrued income	7,678	3,071	1,727	1,141
Accrued subscriptions	2,362	2,716	-	-
<b>Total debtors</b>	<b>12,574</b>	<b>6,661</b>	<b>7,109</b>	<b>5,435</b>

Amounts due from Group undertakings are interest-free and unsecured loans due to the nature of trading and short-term settlement.

## 16 CREDITORS: AMOUNTS FALLING DUE WITHIN ONE YEAR

	Group		Consumers' Association	
	2022	2021	2022	2021
	£'000	£'000	£'000	£'000
Trade creditors	4,434	5,786	1,790	2,605
Taxation and social security	16	153	-	1
Other creditors	7	19	2	3
Accruals and deferred income	6,564	5,585	3,098	2,121
Subscriptions received in advance	4,215	3,488	-	-
Mortgage: 2 Marylebone Road (see note 17)	1,333	1,333	1,333	1,333
<b>Total creditors (due within one year)</b>	<b>16,569</b>	<b>16,364</b>	<b>6,223</b>	<b>6,063</b>

Amounts due to Group undertakings are interest-free and unsecured loans due to the nature of trading and short-term settlement.

## 17 CREDITORS: AMOUNTS FALLING DUE AFTER MORE THAN ONE YEAR

	Group		Consumers' Association	
	2022	2021	2022	2021
	£'000	£'000	£'000	£'000
Mortgage: 2 Marylebone Road	2,466	3,416	2,466	3,416
<b>Total creditors (due after more than one year)</b>	<b>2,466</b>	<b>3,416</b>	<b>2,466</b>	<b>3,416</b>

The mortgage loan reflects the borrowing to part-fund the building development at the Group's headquarters at 2 Marylebone Road, London. Interest is fixed at 1.785%. This loan matures in May 2026.

## 18 PROVISIONS

	Group		Consumers' Association	
	2022	2021	2022	2021
	£'000	£'000	£'000	£'000
Onerous lease	96	478	-	-
Other*	2,245	290	-	290
<b>Total provision</b>	<b>2,341</b>	<b>768</b>	<b>-</b>	<b>290</b>

\* This includes the provision to refund a cohort of members that the group feels it charged more than it should for a number of years. This will be paid within twelve months.

## 19 FINANCIAL COMMITMENTS

The Group had the following minimum lease payments under non-cancellable operating leases for each of the following periods:

	Operating leases (Combined)			
	Group		Consumers' Association	
	2022	2021	2022	2021
	£'000	£'000	£'000	£'000
Not later than one year	706	706	285	285
Later than one year and not later than five years	2,771	2,966	1,140	1,140
Later than five years	24,508	25,101	24,508	24,793
<b>Total financial commitments</b>	<b>27,985</b>	<b>28,773</b>	<b>25,933</b>	<b>26,218</b>

The majority of the total financial commitments relate to the lease on the building at 2 Marylebone Road, London. The Group and company had no other off-balance sheet arrangements.

## 20 FINANCIAL INSTRUMENTS

The Group has the following financial instruments:

	Group	
	2022 £'000	2021 £'000
Investments	37,638	37,502
Trade debtors	1,869	853
Other debtors	665	21
Accrued subscriptions	2,362	2,716
<b>Financial assets</b>	<b>42,534</b>	<b>41,092</b>

The above represent financial assets that are debt instruments measured at amortised cost, except investments and other assets (derivative financial instrument), which were measured at fair value through the consolidated statement of financial activities.

	Group	
	2022 £'000	2021 £'000
Trade creditors	4,434	5,786
Other creditors	7	19
Accruals	6,248	5,496
Mortgage: 2 Marylebone Road: (due within one year)	1,333	1,333
(due after more than one year)	2,466	3,416
<b>Financial liabilities</b>	<b>14,488</b>	<b>16,050</b>

The above represent financial liabilities that are debt instruments measured at amortised cost.

## 21 STATEMENT OF MOVEMENT OF FUNDS DURING THE YEAR

	Accumulated surplus* 2021/22 £'000	Revaluation reserve 2021/22 £'000	Pension reserve 2021/22 £'000	Group funds 2021/22 £'000	Group funds 2020/21 £'000
Balance at 1 July	74,034	10,727	(25,100)	59,661	52,406
Net incoming resources	1,810	-	-	1,810	4,256
Revaluation of investment assets (note 12)	-	(249)	-	(249)	4,148
Realised gains from change in fair value of investment property (note 11)	590	-	-	590	-
Realised gains on investments (note 12)	-	-	-	-	651
Actuarial gains/(losses) on defined benefit pension schemes	-	-	18,300	18,300	(1,800)
Pension benefit surplus unrecognised	-	-	(9,900)	(9,900)	-
<b>Balance at 30 June</b>	<b>76,434</b>	<b>10,478</b>	<b>(16,700)</b>	<b>70,212</b>	<b>59,661</b>

\*Accumulated surplus comprises the below:

	Unrestricted charity funds 2021/22 £'000	Accumulated deficit of trading subsidiaries 2021/22 £'000	Consolidation adjustments 2021/22 £'000	Total 2021/22 £'000	Total 2020/21 £'000
Balance at 1 July	85,015	(19,917)	8,936	74,034	69,127
Net incoming/(outgoing) resources	4,516	11,860	(14,566)	1,810	4,256
Realised gains from change in fair value of investment property (note 11)	590	-	-	590	-
Realised gain on investments (note 12)	-	-	-	-	651
Gift aid distributions paid from subsidiaries to charity	-	(14,566)	14,566	-	-
<b>Balance at 30 June</b>	<b>90,121</b>	<b>(22,623)</b>	<b>8,936</b>	<b>76,434</b>	<b>74,034</b>

## 22 STAFF PENSIONS

The hybrid section of the scheme provides a pension which is the higher of a defined benefit based on a member's pensionable service and salary and the pension that can be provided by a money purchase account which builds up from part of the employer and employee contributions.

The hybrid section was closed to new entrants from 1 April 2004 and closed to accrual on 31 March 2019. Under the current Schedule of Contributions dated 20 June 2022, deficit reduction contributions to the hybrid section of £1,240k per year are payable in equal monthly instalments from 1 June 2022 to 31 March 2026, with an additional payment of £1,750k in June 2022. Contributions to the hybrid section for the year beginning 1 July 2022 are expected to be £1,240k.

The value of the liabilities at the reporting date have been estimated by a qualified independent actuary by updating the preliminary results of the annual actuarial valuation as at 31 March 2022. This allows for the passage of time, benefits paid out of the hybrid section of the scheme and changes in actuarial assumptions over the period from 31 March 2022 to 30 June 2022. Such an approach is normal for the purposes of accounting disclosures.

It is not expected that these projections will be materially different from a summation of individual calculation at the accounting date, although there may be some discrepancy between the actual liabilities for the hybrid section of the scheme at the accounting date and those included in the disclosures.

	2022	2021
<b>Assumptions</b>		
<b>The major assumptions used by the actuary to calculate the scheme under FRS 102 were (in nominal terms):</b>		
Rate of increase in pensions in payment - RPI linked	3.2%	3.2%
Discount rate	3.7%	1.8%
Inflation assumption (RPI)	3.2%	3.2%
Inflation assumption (CPI)	2.5%	2.4%
Rate of revaluation of pensions in deferment	2.5%	2.4%
Return on money purchase underpin fund	5.8%	6.0%
<b>Assumed life expectancies on retirement at age 65 are:</b>		
Retiring today                      Males	22.1	22.4
Females	24.5	24.4
Retiring in 20 years' time        Males	23.4	23.7
Females	25.9	26.0
<b>The assets in the scheme were:</b>	<b>Value at 30 June 2022</b>	<b>Value at 30 June 2021</b>
	£m	£m
Equities and property	13.8	15.6
Bonds and cash	49.8	69.9
With-profits fund	54.5	49.9
Multi-asset fund	8.4	13.4
<b>Fair value of scheme assets at 30 June</b>	<b>126.5</b>	<b>148.8</b>
The scheme does not hold any ordinary shares issued or property occupied by the Consumers' Association.		
<b>The actual return on assets over the year was</b>	<b>20.1</b>	<b>2.4</b>
<b>Net pension liability</b>	<b>2022</b>	<b>2021</b>
<b>The amounts recognised in the balance sheet are as follows:</b>	£m	£m
Present value of funded obligations	(116.6)	(158.4)
Fair value of scheme assets	126.5	148.8
Surplus not recognised*	(9.9)	-
<b>Net pension liability recognised before tax</b>	<b>-</b>	<b>(9.6)</b>

\* See accounting policy for pension costs on page 52.



## 22 STAFF PENSIONS continued

<b>Reconciliation of opening and closing balances of the present value of the defined benefit obligation:</b>	<b>2022</b> £m	<b>2021</b> £m
Benefit obligation at beginning of year	158.4	162.2
Interest cost	2.8	2.2
Actuarial gains	(41.1)	(2.7)
Benefits paid	(3.5)	(3.3)
<b>Benefit obligation at end of year</b>	<b>116.6</b>	<b>158.4</b>
<b>Reconciliation of opening and closing balances of the fair value of the scheme assets:</b>	<b>2022</b> £m	<b>2021</b> £m
Fair value of scheme assets at beginning of year	148.8	152.3
Interest income on scheme assets	2.7	2.1
Return on assets, excluding interest income	(22.8)	(4.5)
Contributions by employers	1.4	2.3
Benefits paid	(3.5)	(3.3)
Scheme administrative costs	(0.1)	(0.1)
<b>Fair value of scheme assets at end of year</b>	<b>126.5</b>	<b>148.8</b>
<b>Amount recognised in profit or loss:</b>	<b>2021/22</b> £m	<b>2020/21</b> £m
Service cost – administrative cost	0.1	0.1
Net interest on the hybrid scheme liability	0.1	0.1
<b>Total expense</b>	<b>0.2</b>	<b>0.2</b>
<b>Remeasurement of the net defined benefit liability to be shown in OCI:</b>	<b>2021/22</b> £m	<b>2020/21</b> £m
Actuarial gains on the liabilities	41.1	2.7
Return on assets, excluding interest income	(22.8)	(4.5)
Change in the amount of surplus that is not recoverable, excluding interest income	(9.9)	-
<b>Total remeasurement of the net defined benefit liability to be shown in OCI</b>	<b>8.4</b>	<b>(1.8)</b>

## 23 LIABILITY OF MEMBERS

The liability of members is limited. In the event of the company being wound up during a member's period of membership, or within one year afterwards, an amount not exceeding 50p may be required from that member towards the payment of the costs of winding up the company and the debts and liabilities of the company incurred before membership ceased.

# 2021/22 COUNCIL, BOARDS, COMMITTEES AND EXECUTIVE MEMBERSHIP

## Council (Consumers' Association)

Attendance/number of meetings in the year	7
Sam Younger CBE (Chair)	7 / 7
Shirley Bailey-Wood MBE	6 / 7
Caroline Baker	7 / 7
Dorothy Burwell	7 / 7
Christine Forde	7 / 7
Harry Gaskell	7 / 7
Donald Grant	7 / 7
Sharon Grant	7 / 7
Mélanie Griffiths	7 / 7
Richard Sibbick	7 / 7
Jonathan Thompson (until 27.11.21)	0 / 2
Charles Wander	7 / 7
David Woodward	7 / 7
Christopher Woolard CBE	6 / 7
Brian Yates	7 / 7

## Which? Limited Board

Attendance/number of meetings in the year	7
Judy Gibbons (Chair)	7 / 7
Anna Bateson	7 / 7
Kenneth Danquah (from 01.04.22)	3 / 3
Harry Gaskell	7 / 7
Julie Harris	7 / 7
Anabel Hoults (Group Chief Executive)	7 / 7
Ian Hudson	7 / 7
Jonathon Moore	7 / 7

## Which? Financial Services Limited Board

Attendance/number of meetings in the year	3
Steve Britain (Chair)	3 / 3
Anabel Hoults (Group Chief Executive)	3 / 3

## Group Audit & Risk Committee

Attendance/number of meetings in the year	5
Ian Hudson (Chair)	5 / 5
Shirley Bailey-Wood MBE	5 / 5
Kenneth Danquah (from 21.06.22)	N/A
David Woodward	5 / 5
Sam Younger CBE	5 / 5

## Investment Committee<sup>1</sup>

Attendance/number of meetings in the year	1
Brian Yates (Chair)	1 / 1
Caroline Baker	1 / 1
Mélanie Griffiths	1 / 1

## Nominations Committee

Attendance/number of meetings in the year	4
Sam Younger CBE (Chair)	4 / 4
Dorothy Burwell	4 / 4
Judy Gibbons	3 / 4
Donald Grant	4 / 4
Elizabeth Oni-Iyola	4 / 4
Michelle Rajkumar-Clifford	4 / 4
Richard Sibbick	3 / 4

## Remuneration Committee

Attendance/number of meetings in the year	3
Caroline Baker (Chair)	3 / 3
Christine Forde	3 / 3
Judy Gibbons	3 / 3
Charles Wander	3 / 3
Sam Younger CBE	3 / 3

## Policy & Advocacy Committee

Attendance/number of meetings in the year	4
Donald Grant (Chair)	4 / 4
Anna Bateson	4 / 4
Sharon Grant	4 / 4
Charles Wander	4 / 4
Christopher Woolard CBE	4 / 4

## Strategic Finance Committee<sup>2</sup>

Attendance/number of meetings in the year	2
David Woodward (Chair)	2 / 2
Judy Gibbons	1 / 2
Mélanie Griffiths	1 / 2
Brian Yates	2 / 2

## Leadership team (at 30 June 2022)

Jenni Allen (Content Director)
Phil Amy (Commercial Director)
Charmian Averty (General Counsel & Company Secretary)
Neil Caldicott (Director of Audiences, Brand and Communications)
Rocio Concha (Director of Policy and Advocacy)
Anabel Hoults (Group Chief Executive)
Helen Moore (People Director)
Clive Mosey (Chief Financial Officer)
Rico Surridge (Chief Product & Technology Officer)

For those serving for only part of the year the total number of meetings they could have attended is presented alongside the number attended (number attended/total possible).

<sup>1</sup> Investment Committee subsumed by Strategic Finance Committee on 6 January 2022.

<sup>2</sup> Constituted as a Committee on 6 January 2022.

**Bankers and  
Professional advisers**

**The Group's principal  
banker is:**

Barclays Bank plc,  
The Lea Valley Group,  
78 Turners Hill,  
Cheshunt,  
Herts EN8 9BW.

**The Group's independent  
auditor and tax adviser is:**

PricewaterhouseCoopers LLP,  
1 Embankment Place,  
London WC2N 6RH

The Consumers' Association  
principal adviser for  
investments is PiRho  
Investment Consulting Ltd.

The Group receives most of  
its legal advice from its team  
of in-house lawyers, but also  
uses external barristers and  
solicitors to provide specialist  
and overflow legal support.

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Saturday 09.00-13.00



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