



**SERVICES FOR DISABLED OR ELDERLY CUSTOMERS  
RESPONSE TO THE CONSULTATION**

**ALTERNATIVE FORMATS AVAILABLE**

# RESPONSE TO THE CONSULTATION

## GUIDELINES ON SERVICES FOR DISABLED OR ELDERLY CUSTOMERS

### 1 Introduction

- 1.1 The Director General of Water Services has a duty to have regard to services required by disabled customers and those of pensionable age. Companies should ensure that no customer is disadvantaged in the service he or she receives as a result of their age or any disability.

At a seminar of water companies and consumer representatives in June 2000, Ofwat identified that it would be appropriate to update its guidelines to water companies on the services they should provide to customers with additional requirements. The guidelines were first issued by Ofwat in 1991. They were updated in draft and put out to consultation in November 2000. Ofwat consulted on both the scope and content of the new draft Guidelines.

The consultation closed at the end of January 2001. Ofwat was gratified to receive a significant and largely positive response from both the water industry and consumer groups. Many useful comments were received and have been incorporated into the Guidelines.

It was important that Ofwat should strike a balance in making changes to the Guidelines between widening the scope of the Guidelines and ensuring that companies would still be able to maintain a proper service to those included on the Register. We believe that the balance now represented by the Guidelines is correct.

A full list of respondents is included at the back of this document.

- 1.2 This document outlines and explains the major changes made to each of the guidelines. Smaller changes to text have not been set out. A copy of the final Guidelines is also attached.

### 2 Changes to the Guidelines

#### 2.1 Register of customers with specific requirements

**Companies should maintain accurate and up to date records of customers who have expressed a need for specific assistance or service.**

- 2.1.1 Ofwat had not proposed to widen the scope of the Register by increasing the categories of customers who could apply to be put on it. However, following the responses received, we have now noted that customers who may be vulnerable when customers are advised not to drink water should also be identified, as well as

those vulnerable during a supply interruption. In practice we expect that these may prove to be the same group of customers.

- 2.1.2 Following representations we have included vocally impaired customers and those with learning difficulties among the list of customers who may have difficulties communicating with the company in the formats usually employed.

Many respondents pointed out that the document could place more emphasis on the needs of customers with mental illness or learning difficulties, and we have now included those customers in the Guidelines, where we consider it practicable and appropriate to do so. It was pointed out that these customers may require the services covered in the Guidelines, but be unable to apply to register themselves, and so we have made provision for carers to place their clients on the Register where appropriate.

- 2.1.3 Some respondents were concerned that it was not clear in the Guidelines that the entries on the register were to be treated according to the provisions of the Data Protection Act: we have therefore added a reference to this legislation.

- 2.1.4 The Guidelines had stated that where a customer had requested one communication in a certain format, this should be followed through to all other communications. Water companies noted that in the case of emergencies, such as interruptions and boil water notices, it may not be practicable to produce these specialised communications sufficiently swiftly, and alternative means of communication will be needed. We have accommodated this point.

- 2.1.5 Respondents noted that the Guidelines had not made any provision for companies to review the customer Register and pointed out that this would be desirable, to ensure that customers still required the services they requested. We expect that in practice companies already do this, but have nevertheless incorporated this into the Guidelines.

- 2.1.6 It was not clear that while we expect water companies to enable customers to carry forward the services they have requested when they move house within their area, this does not apply when customers move outside the water company region. We have added text to clarify this point.

## **2.2 Customer awareness of adapted service available**

**Companies should ensure that customers who may need assistance, or specially adapted services, are aware of the services which are available. Companies should take reasonable steps to inform all customers of the availability of the adapted services offered.**

- 2.2.1 It was noted that the literature available covering the services for elderly and disabled customers should be kept regularly updated and that customer facing staff in particular should be aware of the available provisions. Some water companies felt that to include the leaflet on available services in all new Homeowners packs would be incorrect targeting of customers; however, Ofwat considers that where this is not

done, the pack should at least contain a reference to the leaflet and where and how information can be obtained.

- 2.2.2 Following numerous suggestions from respondents, the illustrative lists of contacts and means of distributing information have been extended. We would point out however that these lists are not intended to be exhaustive and companies have for many years already been using a wide range of contacts in the distribution of information.

### **2.3 Identification of company personnel**

**To ensure that elderly and disabled customers feel secure when visited by company staff, they should be offered the opportunity to choose a unique password, given only to members of staff who need to know it in order to verify the identity of the staff before they are allowed into the customers home.**

- 2.3.1 There was no dissent among respondents concerning the proposed changes to this section of the guidelines.
- 2.3.2 One water company was concerned that it does not currently provide a password service and considered that an identity badge with a photograph and telephone number for customers to verify the identity of the caller was sufficient. However, Ofwat considers that the provision of a password scheme is less open to abuse than such a system and represents best practice in this area of service. Consequently the guidance as proposed remains unchanged.

### **2.4 Communication of information concerning services**

**Companies should ensure that all customers have access to information essential to them as customers. The information should be available to them in a form which they can use.**

- 2.4.1 The changes proposed were not generally challenged by respondents and therefore remain broadly similar. However it was noted by one water company that some customers may prefer to be contacted by the company in ways other than those described. The description is not intended to be prescriptive and Ofwat is happy for companies who are able to offer a more personalised service in the form of visits and telephone calls to customers who request this means of communication, to continue to do so.
- 2.4.2 Ofwat took note of the comment by some respondents that although internet services can be useful, they should not be the only means by which companies can communicate with elderly and disabled customers, and this point has been noted in the updated Guidelines.

## **2.5 All metered customers should be able to check their water consumption at reasonable intervals.**

2.5.1 One water company noted that in some cases the moving of a meter may not be the most appropriate action to take to ensure that a partially sighted customer is able to read their meter. Touch-read meters and outreaders are available, and Ofwat has inserted the phrase “where necessary” into this section of the Guidance to reflect that it may be possible to resolve this issue in other appropriate ways.

## **2.6 Paying Bills**

**Blind and partially sighted customers should know the amount of their bills and when payment is due.**

2.6.1 There was general agreement among respondents with Ofwat’s proposed changes to this section, and those changes are confirmed.

2.6.2 One company advised that it prefers to tailor its debt recovery process to accommodate customers who may have difficulties managing their affairs or making payment arrangements. Ofwat is content that this is an appropriate form of action and has accommodated this within the Guidelines.

## **2.7 Access to buildings and recreational facilities**

2.7.1 There was general agreement with this section of the Guidelines.

2.7.2 It was noted that companies should ensure that staff are available to direct customers to facilities provided for them where necessary. We have added this to the Guidelines.

## **2.8 Provision of advice**

2.8.1 There were no major alterations to this section of the Guidelines.

## **3 Other Issues**

### **3.1 Customers for whom English is not a first language**

Several respondents suggested that the Guidelines should also cover services to customers who do not have English as a first language. However, Ofwat believes that these customers have specific requirements which do not always coincide with the needs of elderly or disabled customers and have not brought these customers into the scope of the Guidelines.

Nevertheless we do consider that companies should have developed strategies to accommodate non-English speakers and to ensure that they are not deprived of service because they do not speak English.

### **3.2 Disability Discrimination Act 1995**

The new Guidelines refer twice to the Act but do not outline its provisions in detail. A few respondents thought it would be appropriate to include more details about the provisions which affect companies.

Ofwat does not consider that it is appropriate to go into the details of the Act in this document. All companies are required by law to comply with the Act and should ensure that they know what action they are required to take in order to do so. The Guidelines are not intended as a guide to compliance with the Act. However, as one respondent pointed out, the Guidelines can be viewed as an indication of best practice and companies who achieve the levels of service set out in the Guidelines will be going some way to achieving the provisions of the Act.

### **3.3 Monitoring**

Respondents encouraged Ofwat to undertake more rigorous monitoring of the services which companies are offering. The range of services offered by each company is already taken account of in Ofwat's Overall Performance Assessment, which reviews the overall level of service which customers of each company receive. The CSCs also speak regularly with the companies in their area about these issues and will continue to do so.

From this year Ofwat has also required companies to report annually on the number of customers it has on its special needs register. This information will be collected with the Annual Return and will be placed in the public domain.

### **3.4 Consultation**

It was pointed out that as well as providing for elderly and disabled customers in their everyday services, companies should also remember to consult with these

customers when researching the views and needs of its customer base in general. Ofwat welcomes and supports this view.

#### **4 Conclusion**

The response to the Guidelines was extremely positive. Many respondents offered suggestions which have enhanced and improved the Guidelines further and Ofwat is pleased to confirm the final Guidelines, as set out in the attached document.

## **List of Respondents**

### **Customer Service Committees**

Central Customer Service Committee  
North West Customer Service Committee  
Northumbria Customer Service Committee  
South West Customer Service Committee  
Thames Customer Service Committee  
Wales Customer Service Committee  
Wessex Customer Service Committee  
Yorkshire Customer Service Committee

Ofwat National Customer Council

### **Water and Sewerage Companies**

Anglian Water Plc  
Dwr Cymru (Welsh Water)  
Kelda Group Plc (Yorkshire Water)  
Mid Kent Water Plc  
Northumbrian Water Group Plc  
Pennon Group (South West Water)  
Thames Utilities Water Ltd  
United Utilities (North West Water)  
Wessex Water Services Ltd

## **Water Only Companies**

Bournemouth and West Hampshire Water Plc  
Bristol Water PLC  
South East Water Plc  
Tendering Hundred Water  
Three Valleys Water Plc

## **Organisations**

Age Concern Birmingham  
Age Concern England  
Association for Spina Bifida and Hydrocephalus  
British Deaf Association  
British Red Cross  
Centrica  
GMB Research  
Mencap  
National Information Forum  
National Water Charges Advisory Service  
Office of the Secretary of State for Wales  
Postal Services Commission

Royal National Institute for the Blind

## **Government Departments and Regulators**

Department of Social Security

Department of the Environment Transport and the Regions

Drinking Water Inspectorate

Environment Agency

The National Assembly for Wales

Office of Telecommunications