



## **Services for disabled, chronically sick or elderly consumers – guidance to companies**

**Revised November 2013**

### **1. Introduction**

- 1.1 Ofwat (The Water Services Regulation Authority) has a duty to take into account the interests of individuals who are disabled<sup>1</sup>, chronically sick or of pensionable age. We recognise that because of age, disability (which includes those who are blind or partially sighted, deaf or hard of hearing) or illness (which includes those with learning difficulties or mental health problems), some consumers may require specific help in the way their company delivers water and sewerage services to them. This is to make sure that they are not disadvantaged when compared with other consumers.
- 1.2 This document contains our guidance to each water and sewerage company on the essential elements of the policy and procedures we believe are required to meet the needs of these consumers, while allowing companies to continue to be innovative in developing additional policies.
- 1.3 As well as this guidance, each company must comply with the provisions and requirements of the Equality Act 2010. These guidelines will help companies to fulfil their obligations under the Act. However, they do not aim to advise water companies on how to meet all the necessary requirements.

### **2. Register of consumers with specific requirements**

- 2.1 Each company should maintain an accurate and up-to-date record of consumers who have expressed a need for specific help or service.
- 2.2 The register should be open to anybody who needs one of the services that a company offers, regardless of their age, health, disability, or indeed their lack of disability. For example, anyone who is concerned about personal security in the home should be able to register for a password scheme.

---

<sup>1</sup> The Equality Act 2010 describes a disabled person as anyone with a physical or mental impairment which has a substantial and long-term adverse effect upon their ability to carry out normal day-to-day activities

- 2.3 The register should include details of any household which notifies the company that it includes a consumer who falls into one of the categories below and who may, as a result, require specific help at certain times, even if they are not the bill payer.
- 2.4 The register should include details of the consumer's specific requirement(s) in relation to their water or sewerage service, including, but not limited to those who:
- are particularly vulnerable during supply interruptions, such as those whose health could be put at risk, or those with mobility problems who may be unable to reach water bowsers or alternative supplies;
  - are particularly vulnerable during actual or potential drinking water contamination incidents, when advice to boil water for drinking, or advice not to use water for drinking or cooking, is issued while supplies are maintained for other purposes;
  - may have problems in communicating or receiving information in the formats that the company usually provides. This may include deaf, vocally impaired, partially sighted or blind consumers, or consumers with mental health problems or learning difficulties;
  - may be vulnerable to bogus callers; or
  - may need help to read their meter, to understand their bills, or to make arrangements to pay their bills.
- 2.5 Companies should use the register to make sure that consumers receive the specialised services they need at all times. For example, if a bill payer asks for their water bill in Braille, all future correspondence should be provided in the same format, (unless the bill payer has said otherwise, or another format is more appropriate (such as in an emergency)).
- 2.6 Companies may also use the register as a way of making sure that consumers only have to request specialised services once. If a consumer moves house within the area and tells the company that this has happened, the register should be updated to make sure that the service they requested at their previous home is carried through to their new address. Where consumers leave the supply area, companies should either seek agreement to share the consumer's data with the new provider or advise of the need to re-register with their new water company. Similarly, where consumers are billed by different suppliers for water and sewerage services, companies should either seek agreement to share data or advise the consumer of the need to register also with the other supplier.
- 2.7 Companies should consider reminding consumers at the time of registration of the availability of similar services in the energy and telecoms sectors. Companies could also consider the value of working with other utility

companies to make reciprocal arrangements which will allow as many consumers as possible to become aware of the special assistance available in all sectors.

- 2.8 Companies should check with consumers that additional services are still required at regular intervals and update the register accordingly.
- 2.9 Companies should accept applications made by nominated carers or advice agencies (such as Citizens' Advice) on behalf of consumers requiring additional services, although care should be taken to ensure that the consumer's consent has been given.
- 2.10 Where consumers are billed through a third party (for example, local authorities or housing associations), they should still be able to register directly with the company for services where appropriate.
- 2.11 Where consumers are billed by a third party (for example in common billing arrangements or resale situations, where a mobile home park site owner or a landlord recovers charges which are subsequently paid to the water company) companies should accept applications made by the third party. This is particularly important where access to water services is essential, for example, where sites contain a large number of elderly or disabled residents.
- 2.12 The register should only contain information that the consumer (or a nominated carer or advice agency) has volunteered, and which is necessary to ensure that consumers get the help that they need. Companies should make sure that control of and access to the register complies with the Data Protection Act 1998.

### **3. Promotion of specialised services**

- 3.1 Each company should make sure that all consumers are informed about the specialised services that are available.
- 3.2 If a consumer receives their bill through a third party billing arrangement (for example local authorities or housing associations), then companies should make sure that information on additional services is provided to these consumers either directly or by the third party in a suitable form.
- 3.3 Each company should produce a strategy to make sure that its consumers are informed about what specialised services are available and how to register for assistance. This will help to ensure that consumers take up the help that a company offers.
- 3.4 As part of its strategy, each company should send information to bill payers on

an annual basis. This should include:

- a leaflet outlining in simple terms the main services available; or
- information explaining that additional services can be provided free of charge, with a clearly signposted reference to where further details can be found. This reference may be included in a company's standard billing literature.

This information should be in appropriate print size and colours, such as those that the Royal National Institute for the Blind (RNIB) recommends.

- 3.5 To supplement the basic literature, more detailed information should be available on request, explaining the specific services that the company offers, and giving details of how to apply. Companies should review and update this information annually.
- 3.6 Information on services that are offered should be easily accessible from companies' websites.
- 3.7 Communication links should be established with local offices of national organisations such as the Royal National Institute for the Blind (RNIB), Royal National Institute for Deaf People (RNID), MENCAP, Mind, Alzheimer's Society and Age Concern. Where possible, copies of literature should be distributed to local authorities and small locally-based support groups within a company's region as this will help to make sure that consumers know about the services available. These groups are often a useful source of information and advice to individual consumers and are frequently closer to those who require assistance.
- 3.8 Companies should also consider the value of engaging with organisations such as the Employers' Forum on Disability who can advise on all aspects of care for disabled people.
- 3.9 Many deaf consumers will have sign language as their first language and may have difficulty understanding written and spoken English. Communicating with their representative organisations, such as the British Deaf Association or local deaf societies, will help companies make appropriate provision for these consumers. Using a sign language video or workshops for local signers may also prove useful.
- 3.10 Companies should consider the range of information available to consumers moving into their area. Where a new homeowners pack is produced, it should include a copy of a leaflet about the services available for consumers requiring special assistance, or a reference to the leaflet and how to obtain it.

- 3.11 Companies should also consider using other methods to publicise their special assistance services and existence of the register. This could include the use of local facilities such as free local newspapers, radio stations, libraries, Citizens' Advice Bureaux, doctors' surgeries and community centres.

## 4. Applying for special assistance

- 4.1 Each company should make sure that the application process is accessible, easy to understand, simple to complete and is administered quickly.
- 4.2 Application forms should be simple and clear so that consumers are not put off registering because of difficulties in understanding the form. Companies should consider involving advice agencies and those organisations with experience of dealing with disability groups when developing their application process.
- 4.3 Companies should provide clear instructions on completing the form and use tick boxes where possible.
- 4.4 The option of registering by telephone (preferably offering both freephone and regional area numbers), e-mail, text phone, minicom or via the website should be provided. This should be mentioned on any literature or information which advertises the services available and also on the application form.
- 4.5 Application forms should make it clear that if two different companies provide services (that is, one for water and one for sewerage) then the consumer will either:
- need to register with both companies; or
  - give their permission for the one company to share information with the other. When this happens, companies should communicate requirements as soon as possible.
- 4.6 Arrangements should be in place to enable nominated carers or advice agencies to add the names of clients to the register where necessary (for example, for consumers with learning difficulties or mental health problems) and where the consumer's consent has been given.

## 5. Communication of essential company information

- 5.1 Each company should make sure that consumers have access to all essential information in a form which they can use and understand.
- 5.2 Each company should consider which are the main and most widely used items of information and make these available to consumers requiring special

assistance in a form which they can use. This could include:

- billing literature;
- information on metering;
- details of the guaranteed standards scheme;
- information provided in connection with a supply interruption or water quality incident;
- information on timing or methods of paying bills, and debt recovery procedures;
- how to make a complaint; and
- how to contact the company.

- 5.3 Large print (14 point minimum) should be used to advise consumers of alternative formats. This notification should be placed where it can be seen easily. Companies should also consider the needs of colour blind consumers when using text and colour. Further information is available from RNIB.
- 5.4 Each company should have arrangements in place for communicating with their sight and hearing-impaired consumers, and those with learning difficulties, in the case of an emergency. Such instances include when advising consumers to boil water in the event of contamination or giving notice of planned supply interruptions. Companies should tell registered consumers what these special arrangements are.
- 5.5 For blind and partially-sighted consumers, the usual alternatives to standard print are disc, large print or Braille. Some companies offer a free magnifying strip. The disc format may have the widest application and can also be helpful for consumers with learning disabilities.
- 5.6 Companies should consider how they present information in disc format. Consumers will want to know the most important information first. So, for example, when consumers receive their bill, they want to know how much it is straight away, rather than the details of their account number or how much water they have used.
- 5.7 Some consumers prefer a personal phone call or visit to the methods of communication described above. Each company should consider whether it is able to offer such services.
- 5.8 The internet is a useful communication tool for many consumers with hearing or sight impairments. Companies should consider providing essential consumer information as British Sign Language webclips on their website. The internet should not, however, be the only means by which a company communicates with such consumers, as many elderly and low-income consumers do not have ready access to the internet. For sight-impaired consumers, software is

available which enables them to access and read e-mails and information on websites, for example by converting the text to Braille. RNIB has guidelines on ensuring that websites are easily accessible to consumers with sight impairments.

- 5.9 Companies should make arrangements other than in writing for communicating with consumers with speech or profound hearing impairment. For example, the company could register with a text relay service or provide real-time text or minicom services. Where this is done, companies should make sure that sufficient staff are trained to use the equipment and that it is placed in a location where it will be noticed and calls will be answered promptly. Ideally, consumer-facing staff should be as easy to contact by real-time text as by phone.
- 5.10 Companies should make sure that they have the facilities to respond to contacts from consumers with speech or hearing impairments in the consumer's preferred format and with appropriate speed. So, an e-mailed enquiry should be answered with an e-mail (unless the consumer asks for an alternative).
- 5.11 Companies should recognise that the standard approach to dealing with customer queries by telephone may not work with disabled customers. Companies should consider [Ofcom's guidance for making call centres accessible](#) which sets out a number of problems that disabled customers face when trying to communicate with call centres along with best practice tips to make sure that call centres are accessible to all.
- 5.12 Each company should make sure that when literature or other information is reviewed and updated, the versions available to people with communication difficulties are also updated. The Consumer Council for Water (CCWater) should be given the opportunity to comment on any substantive changes.
- 5.13 Companies should also consider consulting institutions such as the RNIB and the RNID on the services they make available to consumers, and give them the opportunity to comment on literature or other information when it is reviewed.

## 6. Paying bills

- 6.1 Each company should make sure that bill payers requiring special assistance know the amount of their bills and when payment is due.
- 6.2 Options available should include:
- bills in Braille or large print;
  - a reading service whereby details of the bill are read out to the bill payer

- over the phone before the bill is issued; or
- a bill in disc form.

Companies should make efforts to find out which format their customers would prefer.

- 6.3 The RNIB will provide details of organisations that can produce bills in Braille or large print. It will also advise on the likely number of Braille readers in a company's area. The RNIB may also be able to advise on other available options.
- 6.4 Some bill payers may prefer to nominate someone to whom bills are sent and to whom contact about non-payment, should this arise, would first be made. This service would also meet the needs of bill payers with learning difficulties or those with mental health problems, who may have difficulty managing their affairs or making arrangements to pay their bills.
- 6.5 If a bill payer nominates someone else to receive their bill, the company cannot hold that person liable if the bill is not paid. Instead, companies should allow more time in their debt collection process so that the nominee can sort out any possible problems.
- 6.6 When a nominee has been named and the bill is not paid, the company should make an effort to establish communication with the nominee (as well as the bill payer) in order to make sure that the bill has been received before starting the debt recovery process.
- 6.7 Companies should make sure that if bills are sent out in a specified format, any additional correspondence on the subject of that bill should be sent in the same format, where appropriate.
- 6.8 Companies should not contract debt to third party debt recovery agents where the bill payer is registered as requiring special assistance, unless the agent is able to demonstrate that the same level of service can be provided.

## **7. Access to consumers' homes**

- 7.1 Each company should operate a password scheme to make sure that consumers can identify genuine company staff.
- 7.2 Pretending to be from the "water board" is one of the most common means used by bogus callers to gain entry during distraction burglaries. While other methods of identifying staff such as uniforms, company logos on vehicles and identification cards can be useful, experience has shown that the most effective method of providing the necessary security is the password system. The most

secure method allows the consumer to choose their own password which they give to the company, which then passes this on to the visiting member of staff. The consumer should be able to update their password at any time. Systems where the company gives the consumer a password are more open to abuse.

- 7.3 Vulnerability to unwanted callers may not be confined to elderly or disabled consumers, and companies should make sure that their password system is available to any consumer who wishes to use it (for example, those living alone).
- 7.4 Companies should make sure that deaf consumers who wish to use the password system are able to do so, either through using a written password or other communication arrangements set up for their specific use.
- 7.5 Some consumers, particularly those with mental distress or learning difficulties, may find it difficult to remember passwords. Companies should therefore consider confirming passwords in writing or issuing a prompt question in order to assist these consumers.
- 7.6 In developing and operating a password system, it is sensible, wherever possible and practical, for companies to liaise with other utility companies in their area who may offer a similar system.
- 7.7 Companies should take into account any local or national bogus caller or distraction burglary initiatives and work to increase awareness of the services offered. They should also seek to work with local police, Trading Standards, or other advice agencies, such as Neighbourhood Watch schemes. Each company should sign up to the UK Water Industry Distraction Burglary protocol and make sure that contractors working on their behalf also comply with its principles.
- 7.8 Companies should train staff how to engage face-to-face with those with disabilities and make sure that staff allow enough time for consumers registered for special assistance to answer the door. Those with mobility problems, for example, may need more time.

## 8. Meter siting

- 8.1 All metered bill payers should be able to check their water consumption at reasonable intervals.
- 8.2 For physically disabled bill payers, this could be achieved by either:
- resiting meters where necessary; or
  - providing outreaders in positions that are more convenient for the individual

consumer.

Alternatively, the company may offer a more frequent meter reading service.

- 8.3 Each company should make sure that when it is fitting a meter for the first time in an elderly or disabled bill payer's premises, that the meter is accessible. This may mean siting the meter in a different location to the company's preferred one, for no additional charge. New technology, such as smart meters, which may offer alternative means of monitoring consumption or bills, should be considered.
- 8.4 A more frequent meter reading service (for example, quarterly), should be provided on request for metered bill payers who are visually impaired.

## 9. Access to buildings and recreational facilities

- 9.1 Disabled consumers should know which of the company's public buildings and recreational facilities are equipped to cope with their needs.
- 9.2 We recognise that companies have different policies about provisions for direct contact with consumers. However, the Equality Act 2010 requires companies to make sure that consumers with disabilities can access their public buildings. Companies should take steps to make sure that consumers are aware that access is available to these buildings and that appropriate facilities are provided. This might include providing:
- wheelchair access;
  - tactile signs for blind consumers;
  - facilities for deaf consumers; and
  - toilets for disabled consumers.

Information on access to public buildings should be made available on companies' websites and brief details should be included in any literature aimed at consumers requiring special assistance.

- 9.3 Staff should be available on site to direct consumers to the appropriate signage or facilities where necessary.

## 10. Providing advice

- 10.1 While companies cannot be expected to provide expert advice on lifestyle aids and adaptations (for example, to kitchen and bathroom equipment), they should be able to advise consumers where help can be found.

- 10.2 Local authority occupational therapists have primary responsibility for giving advice on appliances and equipment. They can also give advice on available grant aid. Local authority sensory impairment teams also deal with equipment for blind and partially-sighted consumers. Other sources of advice are the Disabled Living Foundation, Disabled Living Centres, Age Concern, RNID and Assist UK. Companies should make sure that consumers seeking advice are directed to such organisations.
- 10.3 Companies should also make contact, where possible, with organisations in their own local communities which may be able to provide advice to consumers.

## **11. Staff Training**

- 11.1 All company staff should be fully aware of the potential needs of, and services available for, disabled, chronically ill or elderly consumers. Staff should be suitably trained to offer services proactively where they feel this may be appropriate.
- 11.2 All staff (including office based and field based) should be trained regularly to:
- make sure that their knowledge of the special assistance services available to consumers is kept up to date;
  - make sure they know how to identify those consumers that would potentially benefit from receiving special assistance; and
  - be aware of how to communicate sensitively and effectively with these consumers.
- 11.3 The number of staff trained to use specialised equipment should be kept under review to make sure that staff turnover does not reduce the company's ability to communicate effectively with all its consumers.
- 11.4 Each company should consider using specialist external organisations when delivering staff training (for example, RNID or Mind).