



**Anglian Water Services Ltd**  
Lancaster House  
Lancaster Way  
Ermine Business Park  
Huntingdon  
PE29 6XU

Tel 01480 323000  
[www.anglianwater.co.uk](http://www.anglianwater.co.uk)

BY EMAIL: [ListenCareShare@ofwat.gov.uk](mailto:ListenCareShare@ofwat.gov.uk)

27 July 2021

### **Payment, help and debt guidelines consultation 2021**

Thank you for sharing your guidelines and providing the opportunity to comment.

Our understanding of these guidelines is that they form a subjective yet challenging framework to provide a consistency in approach throughout the sector. Its pleasing to see that a move to principle-based regulation in this area allows us the flexibility to manage the relationships with our customers and tailor our approach accordingly.

At times these guidelines appear overly prescriptive which could, if interpreted rigidly, undermine the flexibility of approach laid out with the principles. Flexibility is important as decisions on whether, for example, it is necessary to take enforcement action to recover debt, should be made on customers' individual circumstances.

We believe the expectations laid out are mostly appropriate and whilst all are in part established today, we acknowledge the guidelines highlight some areas of future opportunity.

Whilst we would always seek ways to help our customers, we are not debt or money advisors and it should be recognised that others are more expert in this area. As such clarity is needed on what the expectations around this area are. We do though absolutely agree that linkages and signposting to these external services should be clearly promoted.

Over time customer expectations, needs and channel preferences will shift and ongoing marketing and refinement of existing material to improve engagement rates will be needed. Promotion of digital channels on bills, envelopes, website and via social media is well embedded within our current practice but is an area we have under continuous review as new emerging trends and technologies become available. This extends to new payment channels where customer appetite and cost of providing any such new services, needs to be fully understood before implementation.

Having a 'tell once' approach across the relevant sectors via digital channels needs to be fully inclusive so care will be needed to avoid digital exclusivity. Once established however this should ensure that where needed, tailored help and support can be provided at an earlier stage.

Registered Office  
Anglian Water Services Ltd  
Lancaster House, Lancaster Way, Ermine  
Business Park, Huntingdon,  
Cambridgeshire. PE29 6XU  
Registered in England  
No. 2366656.

an AWG Company

One of the prescriptive points noted is that bereaved customers need a dedicated email route. Our service offering is that customers should have a range and choice of contact channel and receive an equitable response, with empathy and understanding regardless and not that dedicated channels based on specific interaction reasons or service requests are provided.

We recognise good practice in the use of payment alerts, reminder notices and SMS and that variable contact methods could be used but would be grateful if you could provide further clarity and explanation around your more prescriptive expectation that 'at least two prompts (including the bill) for the customer to contact the company before progressing to debt recovery action'.

Flexibility within the guidelines is needed, for example where a company has a charitable trust or debt restart scheme available. To ensure effective targeting of this support, we believe the company themselves should be free to determine when and to whom this should be promoted. Similarly, where a company does not routinely offer free supply pipe repairs, they should retain the option to consider a free repair on a case by case basis, particularly where a customer is determined to be in a vulnerable circumstance.

Our bills are available in large print and braille and our online 'My Account' is available in different languages. These formats are regularly reviewed to ensure they remain appropriate however the demographics and therefore needs within a region may differ therefore flexibility for companies themselves to determine the appropriate formats should be retained.

When an account is passed to a debt collection agent the relevant and accurate information is provided. We would question the rationale for the very prescriptive point that we should provide a full history. In practice, most debt collection agents are FCA regulated so their code of practice can be more rigorous than the water company.

Driving our redesign of service propositions, literature and bills, is our use of daily customer feedback, and we agree that understanding and acting upon our customer views, is crucial. We are though unclear on why the guidelines around the publication of any research are so prescriptive on this aspect and would question the rationale and customer benefit of this.

Overall we believe the principles approach with the flexibility for companies themselves to manage the relationships with their customers, tailoring their approach accordingly, will drive benefit for our customers and we look forward to working together to drive this forward.

Yours sincerely



Jane Taylor  
Head of Customer Services