

Response from Better Pathways

Received by email

Dear Sirs

I am writing in response to Ofwat's 'Guidelines for water companies in supporting residential customers pay their bill, access help and repay debts: a consultation.' I do hope it will not cause too much of a problem that my response is a few days' late. Please forgive me for that.

I am writing on behalf of Better Pathways, a mental health charity that has been supporting people with mental health issues and with learning difficulties and disabilities in Birmingham (and beyond) since 1963. We are encouraged by your obvious commitment to supporting consumers in vulnerable situations and to developing your processes and systems such that you identify early those with the potential to fall into hardship. We agree with you that water poverty is completely unacceptable in today's world.

At Better Pathways we are very used to supporting people that are in situations of vulnerability and understand well the inter-dependence of a whole range of issues that can make someone vulnerable. Poor housing, or no housing, no job or low paid employment, being in the benefits 'trap', limited family support, addiction, abusive relationships (domestic and exploitation in the community), poor education and lack of confidence, self-esteem and aspiration all conspire to adversely impact the life chances of the most vulnerable people in our communities.

At Better Pathways we are not experts in your industry and nor are we in a position to comment on much of the detail within your guidelines. I hope, however, that you will find the following helpful:

Debt advice can be highly complex and advising on debt often leads to the need to advise on and signpost to other services or sources of support. In other words, the more 'holistic' the advice and support is for someone in financial difficulty the more impactful it will be over the longer-term. I note your reference to Fair by Design and the Money Advice Trust. There are some excellent 3rd sector organisations providing IAG (Information Advice and Guidance) to the highest level (7) and you might benefit from partnering with specialist 3rd sector organisations to develop and deliver your debt advice?

Of course, water companies are commercial businesses and so cannot 'take on' all the troubles of your customers. That said, I can imagine one or two impactful CSR projects that could really place you on the map insofar as demonstrating a commitment to making a positive social impact/reducing poverty. For example, what jobs are there in water companies that might be ring-fenced for interview the long-term unemployed and low skilled? What training opportunities or apprenticeships might be available? There are many 3rd sector (and other) organisations commissioned (by the NHS and Local Authorities) to provide employment support to people with a range of issues (long-term unemployed; furthest away from the jobs market, with mental health issues; or learning or physical disabilities); perhaps water companies might commit to making links with those organisations and to offering jobs to people on these programmes (provided they are suitable of course).

Or, perhaps water companies might 'sponsor' (ie, fund) a specialist IAG advisor in each water company area, to be placed with a local 3rd sector provider, to whom customer facing agents might refer those whose needs for support are the most complex? Water companies may well have systems in place to cover this internally, but this is just an idea, one of a few that might be developed to further good partnership working?

We note (Appendix 1, Page 8, Para 2.3) a minimum service expectation that water companies, '*Have specific policies, procedures and systems for proactively identifying and supporting residential customers in vulnerable circumstances*'. (And Para 2.4) that they must '*Make sure their policies, procedures and systems reflect the latest definitions, best practice and guidance from relevant charities and other expert bodies in supporting customers in vulnerable circumstances*'. We can also see Ofwat's commitment to considering the case for new high-level licence obligations covering how water companies should treat the most vulnerable in our society (*Listen, Care, Share – water customers' experience during Covid-19, Page 29*)

Better Pathways has something tangible that it can offer water companies to help them do this. We have developed an innovative, animated, e-learning programme of Vulnerability Awareness Training. We have done this in partnership with a CEO colleague whose business supports contact centres to improve the customer experience (Jacqueline Naughton, CEO, BYC Aqua Solutions). I am delighted to say we have our first customer in the energy sector – a very well-known multi-national energy supplier.

We have written 3 modules of vulnerability awareness training

- Vulnerability Basics
- Understanding Mental Health and Mental Illness
- Advanced Awareness, covering various conditions, eg, ADHD, autism

All modules are delivered via animated e-learning

- Modules are CPD accredited
- They come with a set of test questions with immediate pass/fail feedback
- The modules are certificated
- Organisations adopting this training will be able to use this approach to evidence regulatory compliance

We would be delighted to tell you more about our programme if you feel it would help inform action going forward.

I think I have covered what I had intended and do very much hope you will find at least some of what I have said informative and helpful.

Good luck with the consultation report and, once again, please accept my apologies for being a few days late with this response.

Kind regards

Sue
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