



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

Tel 01480 323000
www.anglianwater.co.uk

BY EMAIL: ListenCareShare@ofwat.gov.uk

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Paying Fair: Help customers pay their bills, access help and repay debts

Thank you for sharing your guidelines aiming to provide a consistency in the approach taken throughout the sector and to ensure a focus on outcomes for all our customers including those most vulnerable or struggling to pay.

We have established processes in place to help identify customers in a range of vulnerable circumstances, including those struggling to pay or with debt problems and our specialist teams are trained to provide tailored temporary or lasting support.

We firmly believe in the need to be fair to all our customers regardless of their circumstance.

In terms of external validation of our approaches, we currently hold accreditation to the British Standard BS 18477 Inclusive service provision. In 2022, a new international standard, ISO 22458, was published which is intended to supersede the BS 18477. This new ISO and associated new Inclusive Service Kitemark demonstrates a company's commitment to vulnerable consumers and provides a framework to develop processes ensuring an accessible and fair service is provided for all.

As this is something we have worked hard to embed across our organisation, this summer we opted into a pilot group to be one of the first organisations to be assessed against this new standard. We are extremely proud to share that following an intense two-part assessment across a broad range of our teams and activities we have been recommended for the kitemark alongside the new ISO Standard. This independent assessment shows us leading the way in providing an inclusive fair service that is available and accessible to all.

To ensure we continue treating customers facing debt recovery action with empathy and sensitivity and that we provide the same quality of service as other customers, we regularly seek feedback and measure customer satisfaction of those customers on our priority service register and those who are engaged with our Extracare and collections teams.

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

Customers whose accounts are managed by local authorities or housing associations receive the same level of service and care as our other customers, where we have named personnel maintaining communication and relationships to ensure any issues are resolved quickly and to the customer's satisfaction.

Accurate and up to date data is essential, and we have robust systems and processes in place to capture relevant information, particularly when customers are moving to and from properties, helping ensure our records and customers' bills are accurate. To help with this we work with external sources such as housing associations and landlord tap where relevant. We have data sharing arrangements in place with some housing associations and we continue to work with others with the aim of implementing new arrangements for the timely sharing of tenancy details.

Within all our contact centres we use speech analytics technology to analyse reasons for contact, carry out quality checks, highlight opportunities for process change or additional staff training and to track our customers understanding of the help and support available. This also allows us to use large volumes of customer feedback to enhance our communications and bill layouts.

We also monitor accounts for opportunities to proactively contact our customers regarding abnormal increases in consumption or perhaps indicators of a leak. With the roll-out of our smart metering programme we are now able to contact customers where there is even the smallest indication of a leak at a much earlier stage. We continue to build an understanding of how customers use water, the behavioural norms that determine that use and what interventions could be effective in changing those norms.

We have pursued an understanding of customer responses to messaging and wider incentives through our interaction with customers in Newmarket using our "Shop Window" project. We also commissioned a report from the Centre of Competition Policy at the University of East Anglia to better understand how price and behavioural signals could interact with customers to encourage water conservation, specifically around the impact and limitations of Increasing Block Tariffs (IBTs). We are currently working with the UK's Centre for Climate and Social Transformations (cast.ac.uk - The Centre for Climate and Social Transformations) to explore the impact of different behavioural change approaches at "moments of change" for customers, in order to reduce PCC. Specifically, we are looking to trial an intervention around the home mover customer journey. The first output of this collaboration has been an evidence review of the literature regarding discretionary use in order to better understand how and when customers use water, and how they value that use. We will take forward insights from this into the design of tariff trials that we expect to commence prior to AMP8.

To communicate with our customers effectively we routinely request and record customer phone numbers (landline and mobile) and email addresses, providing us a variety of contact methods should we need them. Should a customer indicate a preferred contact time we would also endeavour to do this within the working window.

To make our services accessible and easy to use we continually assess the need for new or alternative communication channels. Our newly launched WhatsApp is proving popular. To

make talking to us as easy as possible, we offer a telephone call-back service where customers can request that we call them. They are also offered this option if, upon calling us, there is to be more than a two-minute wait to be answered. A future enhancement to this system will be to allow customers to schedule a call-back for a date in the future.

Whilst telephone remains a popular choice of channel for some of our customers, they can also contact us via live chat, video sign, text relay, email, SMS or WhatsApp for a range of reasons, including up to date account and payment information or to amend their payments. We are, however, seeing a reduction in the traditional telephony contact channel as customers switch to their preferred digital and self-serving channels such as our MyAccount app. For this reason, we continue to offer and develop our digital channels and have seen a further 11% increase in usage in the first half of this year, with over 1 million contacts received through our self-served digital channels for the period April 22 through to the end of Sept 22.

Making it easy for customers to pay is an area we continue to review and whilst a Direct Debit arrangement is the easiest, we recognise this is not always the most suitable or practical payment method for customers. As such we provide a range of free payment locations across the whole of our region such as Payzone, Paypoint and Barclays banks. In addition to Direct Debit and cash payments, customers can make payments by cheque, standing order, payment booklets, payment cards and online through their own bank or the AW app. A range of payment frequencies are also available, allowing our customers to choose the most appropriate option to match their need.

In addition, our online MyAccount and app, available to download in non-English languages, also provides customers the option to submit meter readings, create bills, view their new account balance, make or change their payment amounts, frequency and method. All of these update in real time, enabling our customers, at a time that suits them, to see accurate payment, account balance and billing information.

Our payment methods, channels and frequencies are advertised and promoted widely, including regular email and radio campaigns as well as messaging on our bills and envelopes. In addition, our vast-ranging external partnership work enables us to reach a much greater variety of our customer base and provides opportunity for us to learn from them. One example is that we are soon to test alternative language formats of our Watercare service (which encompasses our Priority Services and our financial Extracare services). Following these trials, we will look to roll-out the alternative language formats to other communications and bills where appropriate.

Where customers have sensory impairments, we offer braille, large print, coloured and audio bills where required and if a customer has difficulty reading or understanding any of our bills or literature, we will provide a bespoke service through our dedicated priority services team. For all these services we have sought input and critique from our partnerships. These partnerships also help us test and learn when we are redesigning or developing new literature, bills or processes. Most recently a bill re-design was started following customer feedback and contact and was then tested in customer groups sourced through our partnerships.

Using a range of data sources including credit reference agencies enables us to apply flags to accounts where we believe there may be a propensity to have affordability issues. Should these customers contact us they are automatically routed to our Extracare team where they will be provided with holistic debt advice with eligibility checks for alternate tariffs, additional government benefits or external 3rd sector support. Using DWP data we are also able to proactively identify customers eligible for a discounted tariff.

Most recently we have partnered with the Gov.uk website where anyone using that benefit checker who lives in the Anglian region will be asked if they want their details passing to us for an automatic assessment for a discounted tariff.

All of this internal and external data informs our debt recovery strategies, ensuring we only pursue debt where appropriate and that we make all efforts to support those who can't pay. Where a customer does find themselves in debt we will proactively seek to engage and offer support. This will include outbound communications via a variety of channels including SMS, WhatsApp, letter and voice. Our debt strategies are tailored to the customer's circumstance and we strive to ensure our communications are friendly, engaging and clear, setting out next steps and the range of support we can offer.

Where a customer is receiving debt advice, we will work with the support agency and provide payment breaks where needed.

A differing but equally important example of our partnership work is with our recent award-winning partnership with ReachOut (trading name of Sigma Connected Ltd). Showcased at a recent CCW best practice sharing event, ReachOut helps us to re-engage customer in debt that are harder to reach. This recently won Best Vulnerable Customer Support Initiative at the Utilities and Telecoms Awards.

Using a 'champion and challenge' method we continue to refine our debt strategies based on outcomes, including customer re-engagement levels. We also use customer feedback and complaints to improve both our processes and our communications, ensuring our debt strategies remain suitable, fair, and empathetic.

Our contact centres and our field teams all receive a variety of training to help them understand and support our customers with both health and financial problems. This helps to provide support points for our customers throughout their interactions with us. Our teams will routinely check a customer's account is correct, which includes checking eligibility for leakage allowances, surface water drainage reductions and alternative discounted tariffs. In addition, water saving devices and tips are shared with those customers on a meter. In all cases a suitable and affordable payment plan will be created, with referrals to advice agencies, charities or other 3rd sector organisations made where appropriate. Where necessary consideration will also be made for further affordability assistance such as our 'Back on track' scheme.

Should an account be passed to a debt collection agent (DCA) we ensure they abide by industry and FCA codes of practice and they treat our customers in line with agreed levels of service. Should the customer raise a query with their account we will investigate the matter

ourselves and are able to obtain access and have regular effective communication channels in place.

Where a customer is at risk of enforcement action, we will ensure it is proportionate and reasonable, clearly explaining the next steps, the process and implications. If, at any point, we become aware that a customer is in a vulnerable circumstance we would halt enforcement action or retrieve the account from the DCA, instead looking to support the customer through a range of measures.

We are committed to safeguarding and promoting the welfare of all people in vulnerable circumstances within the communities we serve. As such we became a founding member of Utilities against Scams, working to raise awareness of and introduce new ways to prevent fraud. This includes extensive training for our staff regarding third party nominees and in areas such as the Mental Capacity Act and Office of Public Guardian guidance. We also have a dedicated bereavement line to support friends and families through difficult times efficiently and with understanding, making the process simple to navigate.

Whilst we believe the expectations laid out in your published Paying Fair guidelines are all in part established today, the guidelines have highlighted some areas of further opportunity which we are progressing:

- Following the trials on alternative language literature, we will look to roll-out the alternative language formats to other communications and bills where appropriate
- Telephony call back - A future enhancement to this system will be to allow customers to schedule a call back for a date in the future.
- Continue to work with our external partnerships to review, amend and introduce new communication channels, formats or services as appropriate
- We are working to develop a customer leaflet for customers billed by local authorities and housing associations which will avoid duplication whilst maintaining clarity of responsibility and the support we can provide.
- Further promote the option for customers in debt to pay using the 'Third party Deduction Scheme', encouraging customers to share information about their circumstances
- Continue to review our range of payment frequencies and methods introducing new ones where necessary.

Our Core Customer Information is attached and has been updated to reflect recent changes This has been shared with CCW and updated following their feedback to ensure full transparency and clarity of the range of support we offer is evident. We will be replacing our current version with this version on our website very shortly.

Once again thank you for publishing the guidelines and we look forward to seeing how this interplays with the new customer-focussed licence condition.

Your sincerely

Pete Holland
Director Customer and Wholesale Services

Darren Rice
Regulation Director