

AffinityWater

Taking care of your water

The tables below summarise our compliance with Paying Fair guidelines and provide evidence and examples of our performance alongside our plans for further service improvements.

Minimum service expectation	Evidence and examples of compliance with service expectations
<p>1. Help make it easy for all customers to pay their water bill - Companies should seek to understand what will make it easier for different groups of customers to pay. This includes providing a reasonable range of payment frequencies and methods for all customers. The entire range of options should be properly and widely advertised to ensure that customers can select the arrangement which best suits their circumstances.</p>	
<p>Ensure information about customers is correct, up to date and is used.</p>	<p>We regularly undertake assurance checks to review the quality of customer contact including collection of contact details, home move calls, occupancy, the accuracy of the contact and how this information is used to promote help and provide advice to the customers on topics such as tariffs, Priority Service Register (PSR) and metering. In addition we use external, third party data to ensure that we have up to date and correct customer information in terms of occupancy, billing and contact information.</p>
<p>Make payments possible in person from different locations.</p>	<p>We offer in-person payment where customers can pay by cash or cheque at bank branches and post office counters. Customers may also pay in person using the PayPoint™ network, free of charge at any participating retail outlet. With this network there are no restrictions to frequency of payment. There is a low minimum transaction value £3.50 and a maximum, £99.00.</p>
<p>Offer flexible payment and billing frequencies to match customers' circumstances.</p>	<p>We offer flexible payment options which mean that customers can pay weekly, fortnightly, monthly, half-yearly and annually, with multiple options for direct debits.</p> <p>Customers have the flexibility to plan how and when they wish to pay Our various payment methods provide flexibility to empower customers to choose what works for them. For example, a customer can choose to pay on a non-standard basis as long as they have paid by the due date. We plan to extend this process to support customers further, allowing them to pay irregularly over a 90-day period.</p>
<p>Offer choice and availability of payment methods to suit customers' needs and preferences</p>	<p>We provide multiple payment options to suit our customers' needs and preferences, including:</p> <ul style="list-style-type: none"> • direct debit • bank standing order • credit and debit cards on our website facility, or by phone on our 24hr payment line • telephone and online home banking • in person by cash or cheque at banks and post offices • PayPoint™ payment cards

	<ul style="list-style-type: none"> • cheque or postal order • Continuous card payment
Encourage customers to use digital payment methods if they can.	We signpost switching to paperless billing on customer bills and provide links to online payment and account management.
Advertise payment options to all customers in a variety of formats, languages and for those with specific communication needs.	<p>We tailor our communications and the ways we signpost alternative payment methods according to customers' current payment methods. For example, if a customer pays by cash, we promote alternative options such as direct debit, internet banking and automated phone lines.</p> <p>Our bills are not available in alternative languages, however we offer a translation service through Language Line where customers can discuss their bill, including payment options, in their preferred language. Further, our website uses the Recite Me tool which will translate our website into over 100 languages.</p> <p>To meet certain other specific communication needs we provide bills, including information on payment options, in alternative formats such as braille and large print.</p>
Use customers' bills and payment transactions to improve customers understanding of options	<p>We regularly review customers' budget payments and proactively adjust budget amounts to manage account balances.</p> <p>Where customers make frequent 'cash' payments we proactively advise alternative payment options.</p> <p>In the near future, we will use our internal data and data from other organisations such as Department for Work and Pensions (DWP) to offer proactively to our customers, reduced tariffs and other support such as third-party deductions.</p> <p>Regarding most appropriate tariffs, we review and remove customers from reduced bill social tariffs if their consumption history shows that they are unlikely to benefit. Under our Water Savings Programme we provide bill information showing the difference between metered and unmetered bills to help our customers make informed choices. We switch customers to metered charging by default (unless they positively opt out) when there is clear evidence that they will save money under measured charging.</p>
Respond efficiently to customers' requests to	In most cases, we deal with changes of payment arrangements immediately via our collections system. In other cases, where requests or queries are more complex, we aim to resolve requests within the response timescales expected under GSS.

<p>change payment arrangements</p>	
<p>Seek better ways to engage with different customers</p>	<p>To increase engagement we have worked with specific organisations on targeted campaigns, for example our work with Scottish and Southern Energy Networks (SSEN) in a London Borough.</p> <p>We have also financially supported charitable projects such as a local Christians Against Poverty (CAP) debt centre that supports households facing complex situations. We have attended focussed 'cost-of-living' events in person to provide information on financial support and PSR.</p> <p>We have sought to innovate in the ways we engage, for example using a dedicated bill explainer page and video.</p> <p>We also learn from best practice in the industry and other sectors to engage with customers in innovative ways.</p>
<p>Show customers how their views on billing, payment and support are encouraging improvements to services</p>	<p>We have a Performance Commitment for satisfaction for customers in financial and non-financial circumstances. We publish satisfaction results at www.affinitywater.co.uk/docs/performance/additional-services-performance-v2.pdf</p> <p>We also have a vulnerability dashboard which 'listens' for indicators of vulnerability including customer verbatim comments. We regularly engage with our water community panel on a range of subjects and use the Water Matters report and UKCSI results as an indicator of comparisons.</p> <p>Our Independent Challenge Group regularly review our billing, payment and support services to ensure that our customers' views and feedback are reflected in our improvement plans.</p>
<p>Make payment, help and debt services inclusive by design</p>	<p>Our customer journeys are designed with the requirements of standards such as BSI 18477 Inclusive Services in mind. We also have a digital style guide which ensures that our website is accessible to the broadest range of our customers and remains compatible with assistive software. We intend to develop our 'inclusive designs' further by using expert partners and users with lived experience.</p>
<p>Consider how customers' ability to pay affects their service experience</p>	<p>We undertake rapid affordability checks taking into account household income and priority expenditure to determine affordability. This is indicated in our code of practice including confirmation that we will be mindful of customers circumstances and will take this into account when discussing their situation.</p>

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Use best practice when using credit reference agencies

Currently we do not use credit reference agencies, although we plan to do so this year. We will update our code of practice to reflect this change

2. Make sure customers who are eligible or help receive it when it is needed. - Companies should establish and implement clear and effective policies, procedures and systems and a helpful culture to identify customers in vulnerable circumstances, including customers at risk of falling into debt and other life events such as financial abuse or a bereavement, and take proactive action to offer them support.

Use all reasonable efforts to predict and support customers at risk of falling into debt

We are in the process of using our partnership with DWP (see above) to identify customers at risk proactively and offer support.

We signpost on our website and in our calls the additional support provided by other agencies. Our colleague training raises awareness of triggers which may indicate customers are at risk of falling into debt.

We have recently implemented a data and analytics tool from Qualtrics, which draws on all our communication and contact channels with customers, social media, and event data, and analyses them using advanced analytical and data visualisation techniques, such as Natural Language Processing. We believe this is the first time that such a comprehensive and powerful customer analytics platform has been deployed in the water industry and the resulting insights create a powerful depth of understanding about what our customers want and how we can improve our processes in all areas (not just for customers struggling to pay)

We are still developing the suite of dashboards needed to use the tool fully. As a priority we intend to create a dashboard that listens for indicators of cost of living pressures so we can proactively contact customers to check in with them and offer support if it is needed. We welcome the opportunity to demonstrate how we intend to use this information.

Identify and support customers in vulnerable circumstances

We have recently refreshed our vulnerability training which has been developed with the help of external vulnerability experts. The training covers the relevant legislation and will be delivered to all our customer-facing colleagues this year.

As outlined above, the recent implementation of the Qualtrics system allows us to use artificial intelligence techniques to identify customers in vulnerable circumstances using all customer and communication contact channels.

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Use data sharing arrangements to identify customers in vulnerable circumstances	We recently concluded a data sharing agreement with DWP which is due to start in January 2023 and expect PSR data sharing by March 2023. We also have agreements in place with CAP and plan further agreements with other organisations. We expect that these data sharing arrangements will improve our ability to identify and support vulnerable customers. We also share data or plan to share data with our wastewater partners to identify customers in vulnerable circumstances.
Communicate effectively and sensitively with customers in vulnerable circumstances	We have recently reviewed our communications for tone of voice and we have ambitions to make sure that we have easy read versions of our most common documents and forms. Customers can also contact us over the phone or via WhatsApp for billing, debt and affordability needs.
Offer customers the option for their account to be managed by authorised third party individuals	We are building this capability, having advanced drafts of Third Party Bill Management documents, including how customers are protected, how to provide and withdraw consent and guidance for our employees on dealing with organisations such as free independent debt advisers.
Use approaches to debt management for customers in vulnerable circumstances that are appropriate to their circumstances	Customers are signposted for holistic debt advice during conversations. Recovery letters refer to social tariffs. We are in partnership with National Debtline and have a dedicated webpage with them. We have provided examples of how we have helped customers with 'personas' on our website.
Make it easy for relatives to close or amend the accounts of a loved one who dies	We believe we operate simple and well documented bereavement processes. In addition, we are working with Settld/Life Ledger to signpost their services to relatives. We also signpost information about other services that relatives may find helpful on the back of our bereavement letter.

3. Treat customers that have their accounts managed by agents as customers of the company - Customers whose accounts are managed by local authorities, housing associations or some other form of billing agent should, wherever practicable, receive the same level of service and care as those whose accounts remain with the water company.

Have clear agreements with agents	<p>We have contracts in place with local authorities, housing associations and social housing providers to manage the accounts of customers billed by billing agents.</p> <p>We agree with the principle that wherever practicable, customers should benefit from the same service and care as those who are our direct customers.</p> <p>We do aim to agree solutions with our partners and where possible and practicable we can arrange for households to benefit from reduced bill tariffs.</p>
Make customers aware of their rights	
Consult tenants where charges are collected as part of the tenancy	
Act quickly to help resolve disputes between customers and agents	

4. Be proactive in contacting customers in debt - Companies should be proactive in making contact with customers to identify whether they are in payment difficulty. Companies should regularly review their contact methods to make sure they meet the needs of customers. Companies should use every contact as an opportunity to listen, gain more information about the customer's ability to pay and share ways they can be supported.

<p>Show customers empathy</p>	<p>We regularly conduct quality assurance checks for calls handled by our teams to assess how well we have met customers' needs, including managing their case sensitively and fairly.</p> <p>The debt collection agents that work on our behalf have shared with us their policies and how they undertake quality assurance to ensure that they treat customers fairly and with empathy.</p>
<p>Proactively offer other alternative payment options to customers in debt</p>	<p>Through our correspondence with customers in debt, we highlight the different options available for customers to pay.</p> <p>Where we use the 'Third Party Deduction Scheme' we advise customers that we will apply for deductions and how the scheme works. We also include in the notification that if a customer wishes to pay a different way to call us and we can rearrange.</p> <p>We have also built a relationship with a local Jobcentre Plus where we hold 'surgeries' in their offices.</p>
<p>Send clear reminders that provide advice and next steps</p>	<p>Our first contact following the bill is a 'you should have received your bill by now – here's how you can pay' message. This happens 10 - 15 days after the bill. The first reminder that the bill is overdue is approximately on day 21. We use both SMS and email to contact our customers where we have these options available to us. Our reminders provide information on how to pay and encourage contact if customers are having difficulty in paying.</p> <p>Including the bill, we will issue three reminders and attempt phone contact before we start debt recovery, which is approximately 45 - 50 days after non-payment. We signpost independent debt advice on our letters and provide a local rate phone number.</p>
<p>Contact customers using different methods and stop chasing them if they are getting debt advice</p>	<p>Our communications and methods take account of any special requirements for customers on our PSR and are sent in the format required by the customer, such as large print. If we know that a customer is actively engaging with a known debt advice provider our agents can hold the account from the recovery process to allow time for the customer to seek advice. Signposting to other services is part of our affordability review process.</p>

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Make sure communications are friendly and company representatives are easy for customers to talk to	We have reviewed our communications for 'tone of voice' to ensure that they encourage customers to engage with us or an agent acting on our behalf. We offer the facility for customers to contact us by WhatsApp as well as letter, phone and email. We are currently piloting an online Webchat for customers and will expand this service if the pilot is successful.
Tailor debt recovery strategies and review them for suitability, fairness and empathy	Our code of practice on debt recovery provides an indication of our strategy and the steps we will take as the customer's debt increases. Our vulnerability dashboard has been built to 'listen' to indicators of vulnerability. This system uses customer contact from various sources to help us identify customers in difficulty. In future we plan to explore the practicality of using customer segmentation to tailor debt recovery journeys.
Demonstrate quality service	Our customer systems, such as our billing system (HiAffinity) and (Tallyman) debt management system are updated with debt actions. We do provide customer stories in the form of personas on the website so that customers can see how we have helped others. We regularly refresh our personas to ensure they are up to date, relevant and suitable.

5. Be clear, courteous and non-threatening to customers in debt - All communications sent to customers in debt should be in plain language and numbers, be courteous and non-threatening. But the water company should clearly set out the action which they will take if the customer fails to make payment or contact the company, along with the possible consequences for the customer

<p>Design the content of communications around customers information needs</p>	<p>Our letters direct customers to our charges scheme document which outlines our debt recovery procedure and is all available in an accessible format online, so we do not provide the code of practice on debt recovery in our letters. On the front of our letters we have a headline of 'Need a little help' which links to a page with our various affordability solutions. The envelope has a similar message on the outside. Ways to pay is also noted on the letter as well as the availability of free independent debt advice. The letters explain when the payment is expected by.</p>
<p>Tailor the language of communications to customer's needs</p>	<p>Our letters are not available in alternative languages, but we do offer a translation service through Language Line where letters can be discussed in the language of the customer's choosing. We do provide letters in alternative formats such as braille, large print. We have reviewed our communications for 'tone of voice' to ensure that they encourage customers to engage with us or agents acting on our behalf and are written in non-threatening language.</p>
<p>Use fair tools for encouraging payment</p>	<p>Neither we or agents acting on our behalf threaten to disconnect or use void notices as a debt collection tool.</p>
<p>Explain the implications for customers at risk of enforcement action</p>	<p>We advise customers in advance if their account is to be referred for court action. We follow that with a letter explaining what is happening, the implications of enforcement and give information on debt advice, further opportunity to pay, ways to dispute the debt if appropriate and how to contact us.</p>
<p>Use enforcement action as a last resort</p>	<p>We only consider enforcement action when we have exhausted all our other recovery processes.</p> <p>In most cases, by the time recovery processes are exhausted we will have established whether customers are in vulnerable circumstances. If however a customer is identified as vulnerable once enforcement action is underway then we halt further action until we have investigated the circumstances.</p>

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Respond quickly, fully and appropriately to disputes or queries about debts	If a customer disputes the debt, our debt recovery processes provide opportunities to raise disputes and queries. We halt further action whilst the query is being investigated.
Regularly review and update debt communications learning from feedback and complaints from customers	Our vulnerability dashboard has been built to listen to indicators of vulnerability. This system uses customer contact from various sources to help us identify customers in difficulty. This also feeds into our Customer First programme which is reviewing customer journeys and the principles of inclusive design will be considered in any potential changes. There have not been any substantive changes to the debt recovery process. Code of practice on debt recovery has been updated as a result of these guidelines and is available online and hard copy where required.

6. Agree payments that are right for each customer in debt. When agreeing payment arrangements with customers, the customer's circumstances should be taken into account wherever possible. Payments should be based on a consistent approach for assessing a customer's ability to pay. Repayments should be understandable to the customer and regularly reviewed as their circumstances change to make sure repayments are sustainable. And the customer should be re-engaged if the payments fail.

<p>Double check that the customer is in debt</p>	<p>If a customer disputes the debt they are given opportunities to do so throughout the debt recovery process and further action is halted whilst the query is being investigated. Enforcement action is only considered when an account has been completely through our recovery process. Before litigation commences our legal team thoroughly vet the account to ensure it is clear how the debt arose and over what period. Customers are also able to reply to indicate that they want time to pay, dispute the sum due or need further information.</p>
<p>Establish each customer's ability to pay and allow customers to consider payment proposals</p>	<p>We include in our code of practice on debt recovery how we currently assess customers' ability to pay.</p> <p>Whilst we do not currently use the Standard Financial Statement (SFS), our own processes ask for similar information to SFS - household income and priority expenditure.</p> <p>Where debt agents act on our behalf, they also check whether the customer's priority expenditure is up to date and that the instalment or payment to us will not affect any other arrangement in place.</p> <p>In future we intend to standardise our approach to agreeing affordability and plan to adopt the SFS approach.</p>
<p>Refer customers to company's financial hardship fund or other affordability schemes for help</p>	<p>We have improved our debt respite schemes to provide immediate support where a household is in crisis and we are working with our wastewater partners to develop further schemes. We actively promote the help available through tariffs. We have been granted permission to refer to Thames trust fund and we are working on providing an affordability hub so our colleagues have easy access to all the support that we can provide or signpost our customers to.</p>

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Help customers reduce future charges	We can demonstrate through our QA process and documented procedures that customers are signposted to the range of support measures suggested.
Agree repayment levels that are realistic, understandable and regularly reviewed	Our employees have received training which covers setting of payment arrangements. They have the authority to agree payment plans with customers over the phone and these are confirmed in writing by our debt monitoring system. They explain to customers when payment arrangements are agreed what parts cover current charges versus arrears. These are reviewed and adapted as the customer's situation changes.
Refer customers to local advice agencies, charities or voluntary organisations for further help	<p>We provide a charitable donation to National Debtline and we have a co-branded webpage where customers get instant access to debt advice and support. We also provide a fair share contribution to Stepchange. We signpost other free independent agencies, such as Citizens Advice Bureau. We are ready to work with any formally authorised debt advice agencies. Our affordability hub will include information on fee-charging companies so that customers are provided with information on similar services that do not make a charge.</p> <p>We are planning to develop and expand our signposting to warm referrals, so that less effort is needed from customers to obtain help and support.</p>
Re-engage with customers over missed instalments and make sure follow up action is proportionate	When a payment arrangement fails, we issue reminders which reassure customers that we can help if they are struggling.

7. Treat customers facing debt recovery action with care - Customers whose accounts are managed by debt recovery agents, should wherever practicable receive the same level of service and care as those whose accounts remain with the water company. The potential consequences of having their debt managed by a third party should be no more severe than if the service was provided directly by the company

<p>Treat customers facing debt recovery action with empathy, sensitivity and provide the same quality of service as other customers</p>	<p>The agents who act on our behalf have clear policies and procedures outlining how their operatives should treat customers fairly. They have robust QA processes to ensure that their operatives are meeting expectations. Debt collection agencies are also regulated by the Financial Conduct Authority. We have satisfied ourselves that customers facing debt recovery action are treated with care by reviewing DCA policies, procedures, communication and training materials, as well as by listening to DCA calls with customers.</p>
<p>Ensure the needs or priority service register customers are met</p>	<p>We have reviewed with our DCA how the needs of priority service register customers are met. Some of our DCAs have dedicated teams that manage the accounts of customers in vulnerable situations and we have no evidence to suggest that the needs of PSR customers cannot be met. From call-listening we have evidence that our DCAs handle disclosures sensitively. In future, we wish to review and improve consistency of communications across our DCAs in terms of meeting the needs of PSR customers.</p>
<p>Use reputable debt collection companies that treat customers fairly and in line with agreed levels of service</p>	<p>Our debt collection agents are authorised by the Financial Conduct Authority and abide by the standards of that organisation. As noted above, we review DCA policies and performance to ensure service levels.</p>
<p>Regularly and robustly check customers facing debt recovery action are treated sensitively</p>	<p>We are in the process of reviewing policies, procedures, copies of standard communication materials, training and undertaking call listening with all our DCAs. We will conduct a robust audit regularly with our DCAs of which we will retain evidence.</p>
<p>Continue to communicate directly with customers facing debt recovery action</p>	<p>Prior to action, we warn customers that their account may be passed to a debt collection agency. We also notify customers at the time that their account has been passed over. DCAs provide a range of payment options in line with what we offer.</p>
<p>Retain access to the customer's account</p>	<p>We are able to see the payment arrangements that have been agreed between customers and DCA operating on our behalf.</p>
<p>Allow customers to raise disputes involving the agent with the water company</p>	<p>Customers are able to raise complaints with us, regarding agents acting on our behalf. This is also covered in our code of practice on debt recovery.</p>

AffinityWater

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Speak to local authorities to find alternatives to evictions where non-payment of water charges could result in evictions	Affinity Water do not pursue eviction due to non-payment of water charges.
Only sell debt to reputable parties and where other recovery activities have been exhausted	The company used by Affinity Water for this purpose is reputable, being authorised and regulated by the FCA and is also a member of the Credit Services Association. As noted above, we only follow these approaches as a last resort when we have exhausted other recovery processes.
Tell courts promptly when customers clear their debts	Our legal team writes to the court once we become aware that any court judgement has been paid.
Demonstrate service levels to CCW	We can provide evidence of our audit process with the agents who act on our behalf. We will be able to demonstrate service levels to CCW, including for example the option to meet the agent and visit the agent's premises.