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13 October 2023

**Service for all – draft vulnerability guidance for supporting customers who need extra help**

Thank you for providing the opportunity for us to respond to your consultation on the proposed guidance. We welcome and support the aim to improve outcomes for our customers, setting clear expectations, providing clarity, and providing the appropriate support. As requested, we structure our response in line with the questions proposed in the draft guidance.

**1. Do you agree that we should retain the vulnerability definition we set out in our 2016 Vulnerability Focus report?**

Yes, we support the retention of this definition. We have worked hard to move to a language where a customer is in a vulnerable circumstance and further welcome the suggestion to move further from the term vulnerability.

**2. Do you agree with our approach to nomenclature, particularly our use of the term 'extra help'?**

We support the simplicity and use of the term 'extra help'. We would however recommend further engagements with the third sector to test if consumers find this term synonymous and relatable to the support provided under the Priority Service Register.

Through customer engagement we have found this term can be divisive in its use, with some customers feeling this inferred a level of inability and vulnerability, preferring the term support. Views across those we engaged with were mixed, there was no prevalent or singular term favoured.

**3. Do you agree with our proposed approach to applying the guidance to new appointees and the Welsh non-household sector?**

Yes, we support the guidance being applied to new appointees and the Welsh non household sector.

**4. What impact do you think our draft guidance will have on the experiences of customers who need extra help?**

The targeted PCs for the Priority Service Register have moved the industry to improve greatly in this area over recent years and has seen service, process and policies updated to reflect the wide ranging needs of our customers.

Whilst we are committed to the attainment and recertification of the ISO22458 and Kitemark this proposed guidance will ensure the needs of customers will remain at the forefront of company plans and ways of working. As we work ever more closely with our vast array of partners, we learn more about the diverse needs of customers, this guidance will ensure this continues and we push for even more improved tailored service offerings.

**5. Are there further lessons from other regulated sectors that could be incorporated into our draft guidance?**

The SECV initiative in the energy sector incentivised companies to enhance support for vulnerable consumers through high-quality stakeholder engagement and innovative practices. Our engagement with scheme participants revealed a significant positive impact, pushing them to collaborate more effectively and provide improved consumer support. Recognising and incentivising company performance in this area ensures that minimum standards don't become the ceiling of their ambitions. Whilst we believe companies remain committed to delivering greater outcomes for consumers, we feel that recognising company performance will actively drive, as opposed to encourage innovation.

**6. Do you agree with our proposed approach to enforcing our customer-focused licence condition by reference to our draft guidance?**

Whilst we agree with the approach in principle, we would request greater clarity and detail as to how Ofwat would enforce these principles and refer back to our response to the initial consultation.

**7. Do you agree that our draft objectives cover the broad areas of vulnerability support activities that companies should be considering?**

Yes, we feel the draft guidance to be well considered and provide a balanced and meaningful approach to ensure the delivery of the core components of support to those who may need extra help.

**8. Do you agree with the proposed list of minimum expectations we have set out?**

Yes, we agreed with the proposed list of minimum expectations, we feel this provides clear guidance for companies.

**9. Do our draft minimum expectations offer a good balance between making clear the minimum standards we expect from companies, and challenging companies to innovate and find new ways to meet the needs of their customers?**

Whilst the guidance actively promotes innovation and we believe companies are committed to continually enhancing the services they provide to improve overall customer experience, we feel that more could be done to drive innovation across the industry.

We would suggest that Ofwat explores how it can actively recognise companies who have gone over and above in the delivery of services to customers who may need extra help.

**10. Do you agree with the proposed approach and timeline around companies' vulnerability strategies?**

We would request that the PSR Standards document is shared and published prior to companies being required to publish their vulnerability strategies.

**11. Do you agree with our proposed approach and timelines for setting out our detailed expectations around the design of priority services registers in a separate standards document?**

As per question 10, our strong preference would be that the PSR Standards document is shared and published prior to companies being required to publish their vulnerability strategies.

Yours sincerely,

**Pete Holland**

Director of Customer and Wholesale Services