

Service for all – Ofwat's draft vulnerability guidance for water companies supporting customers who need extra help.

Response from Dŵr Cymru Welsh Water

Q1. Do you agree that we should retain the vulnerability definition we set out in our 2016 Vulnerability Focus report?

A1. We have no issues with this approach.

Q2. Do you agree with our approach to nomenclature, particularly our use of the term 'extra help'?

A2. We have no issues with this approach.

Q3. Do you agree with our proposed approach to applying the guidance to new appointees and the Welsh non-household sector?

A3. We have no issues in principle with this, however there needs to be careful consideration in terms of how this is implemented and we would welcome detailed further discussion on this, to understand how we balance the different needs of household and non-household customers during incidents.

Q4. What impact do you think our draft guidance will have on the experiences of customers who need extra help?

A4. The guidance will give all customers, and the organisations/individuals that work with those that need extra help, clarity on what they can expect from us. By publishing our strategy, this information will be easily accessible to customers and stakeholders. This will in turn support the sharing of best practice between companies.

Q5. Are there further lessons from other regulated sectors that could be incorporated into our draft guidance?

A5. There are no obvious omissions in this guidance or the current draft of the customer focused licence condition, which has drawn on lessons from other sectors including the financial services sector. Sharing good practice at a company level is already well established and will continue.

Q6. Do you agree with our proposed approach to enforcing our customer-focused licence condition by reference to our draft guidance?

A6. We agree with the proposal to use existing insight/measures to monitor companies' performance in this area, which aligns with the approach being suggested in monitoring the proposed customer-focused licence condition. However, we would welcome clarity on the exact nature of the insight and a discussion on the extent to which different measures demonstrate that companies are satisfying the guidance.

Q7. Do you agree that our draft objectives cover the broad areas of vulnerability support activities that companies should be considering?

A7. Yes, these cover the main areas. The explanations in the 'what it means' column are helpful and we welcome this clarity.

Q8. Do you agree with the proposed list of minimum expectations we have set out?

A8. We agree with these in principle and largely offer these to customers currently. The areas where we have gaps are due to system limitations, therefore some recognition is needed of the time it will take to address these.

Q9. 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?

A9. Yes, the expectations to offer a good balance. Again where there are gaps in service offering there may be system limitations that may take time to address.

Q10. Do you agree with the proposed approach and timeline around companies' vulnerability strategies?

A10. We agree with the proposed approach and timeline. We are already in the process of reviewing our Vulnerability Strategy with partners and stakeholders which aligns to the timelines outlined.

Q11. Do you agree with our proposed approach to how water companies should use our guidance?

A11. Yes.

Q12. 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?

A12. We do not have any issues with the proposed approach however there needs to be alignment with the ongoing Water UK / industry data sharing activity. We also would like to ensure that duplication is avoided with the draft objectives stated in the guidance.