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By email

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Re:-Service for all – ofwat’s draft vulnerability guidance for water companies supporting customers who need extra help.

MorganAsh response.

We have pleasure in enclosing our thoughts on this consultation.

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

We think that vulnerability is a range and not a binary issue. We consider it is resultant of a consumer characteristics and the circumstances that they may be interacted with. We believe an objective consistent method of assessment should be used. That a vulnerability definition is only contentious when the assessment is left to individual’s subjective assessment. There may emerge multiple objective assessment methods – but at least with volume these could be correlated.

We attach a paper which gives far more detail on our views on how the definition and understanding on how consumer vulnerability is assessed and recorded.

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

“Extra help” is fine.

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

No comment

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 What impact do you think our draft guidance will have of the experiences of customers who need extra help?

With good data and systems the provision of extra help can be targeted and economical. Without good data and systems, as shown elsewhere this can be expensive and ineffective.

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 Are there further lessons from other regulated sectors that could be incorporated into our draft guidance?

While there are different methods to measure and differing principles – there is the opportunity to share data and utilise benchmarking across sectors that will help in the understanding and efficiencies.

The energy utilities have demonstrated that all building internal systems focused on the PSR and meeting regulation, but with poor data structure, has been wasteful, as they are now all looking to share data and will need to rebuild their data.

6. Do you agree with our proposed approach to enforcing our customer focused licence conditions by reference to our draft guidance.

No comment

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

A consumer ‘need’ may be specific to the water company and hence not a transferable piece of data to another utility. We advocate that data is split to be specific to the consumer so this can be shared between firms. (Please see the full explanation in the attached document on data structure).

We hence propose to “record characteristics and severity” and “potential harm and need” rather than just needs.

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

3.3 identifying customers focuses on companies having a comprehensive picture of extra help required. While we agree with this, it is likely to result in firms recording the need of the consumer which are specific to water companies and hence not transferable to other utilities. We encourage the collection of data on consumers that is specific to the consumer and hence transferable with other utilities as well as identifying the need which is specific to the utility.

3.3 – with regard to the “wide range of prospective steps....to identify” – we would add direct contact with the consumer, as this is cost effective and engaging.

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?

We think more emphasis should be put on sharing data, particularly with other utilities. Experience from energy utilities is this has been slow and hence less effective.

Like a lot of other vulnerability regulation it emphasises that staff should be trained to identify vulnerabilities. While this is all good too many companies elsewhere have focused on staff training without equal attention to building systems and process for digital communications.

We think firms should have to have some objective methodology to assess and record vulnerability – so the data and records are consistent. Without this and personal subjective assessments the data is poor and inconsistent.

As above with regard to customer needs.

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

Fine

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

Fine

12. 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?

We think it is worth pointing out the limitations of a simple PSR list approach. (please see attached paper). While evolving the PSR approach is likely to be a practical compromise, we think pointing out its limitations and encouraging firms to expand them in scope and detail will help firms to be innovative in the way forward and not simply stick to the PSR list approach.

We trust this has been helpful.

Kind regards

Andrew Gething
Managing Director