

Thank you for sharing your guidance with us, we have reviewed and provided the following responses below on behalf of Northumbrian Water.

Please let us know if you would like to discuss any comments below.

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

We are comfortable with the current definition from the 2016 Vulnerability Focus report. The definition feels broad enough to cover both long term and temporary circumstances which the customer may experience.

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

We support the move away from reference to vulnerability, as we agree that customers feeling labelled can discourage them from sharing circumstances. As part of our overall review of customer service, we have found focusing on providing tailored service more beneficial. As part of an Innovation Festival sprint in 2022, which brought together experts and customers with real life experiences, we have explored removing barriers and hyper personalisation to improve service for all our customers and this has been incorporated into our wider customer experience strategy.

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

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Yes, we feel that it is important that all customers should have the same expectations around extra support. We would just highlight that many smaller non-households in England, whilst eligible for the retail market and supplied by a retailer may act like households. Financial vulnerability is correctly not covered by this guidance proposal for this group however we would hope that retail market protections are sufficient to ensure these customers don't receive a lower quality service.

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 What impact do you think our draft guidance will have of the experiences of customers who need extra help?

We are pleased that the guidance is generally aligned to our current approach to supporting vulnerable customers, with a couple of points which require clarity. Working with our customers, key stakeholders and vulnerability experts we introduced our Customer Inclusivity Strategy 2018-30, which covers the same core principles around customer support. This strategy has been updated this year and can be found here:- [Our Customers \(nwg.co.uk\)](https://www.nwg.co.uk)

We also introduced a of measure satisfaction for customers who are registered for extra help as part of PR19 and have been using the learnings from this to continually develop our offerings.

On this basis, from our customer perspective, we feel that this will act to support our approach with the focus on providing tailored service which is core to our long-term plan to support all customers.

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

We do not have additions to share on this question.

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

We are comfortable with this approach.

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

Yes, we support the key objective areas and align to the principles which we have in place. In 2018 we launched our Customer Inclusivity strategy 2018–2030, where we set out of long term aims for supporting customers. This covers both our support for customers who need extra help both financial and non-financial. The key areas that are covered are part of the foundation of this strategy.

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

We support the setting of minimum expectations, and would like to comment on the following:-

- a) Minimum expectation 1.1: Companies should adapt their services to customers in line with any known extra help needs. This is especially important during times where there is increased risk of harm; for example, during incidents. Offering a range of different communications channels and adaptations to suit different customer needs (for example, large print bills, alternative languages, telephone bill reading, etc); – we have previously raised that providing all letters in alternative language is a challenge and we need to consider how this could be delivered.

We provide a range of alternative channels and adaptations to suit our customers needs, with large print bills, telephone bill reading, sign language etc. A telephone translation service is also provided for telephone calls and we use Recite so that customers can use our website translated into a language of their choice.

We have translated letters for campaigns when communicating where specific languages are high. We find the cost of translating letters is very high at individual level, which would restrict translation of all letters at individual customer level (We would of course work with an individual customer to find an appropriate solution if they were highlighting communication difficulties). This minimum requirement needs to be considered alongside ofwat's retail costs allowance where companies are targeted to reduce costs further on an ongoing basis.

The guidance does not specify whether translation services are required for all communications, and as such we would propose that our current approach is appropriate given the financial constraints placed on us.

- b) Minimum expectation 1.3: Companies should develop clear policies that set out any compensation arrangements for customers whose extra help needs have not been met.

We have recently contributed to the consultation on GSS standards from CCWater and shared the following. It is our view that all customers should be travelled fairly and consistently. We would not consider a separate payment for someone on the PSR. Other customers may be unregistered or impacted in different ways, and it would not be fair to compensate a customer simply for being listed on the register. It may also encourage the wrong behaviour and lead to people registering who don't really need additional support, or in extreme circumstances where they are aware of this clause.

On a case-by-case basis, we will always review individual customer circumstances during and following an incident and make payment over and above the GSS where appropriate. This aligns with Ofwat's recommendation in their earlier review of the GSS when considering the impact of loss of supply.

- c) Minimum expectation 4.4: In designing their approach to recording and, where relevant, sharing customer vulnerability data, companies should take into account customer views on data protection and privacy. Companies should take steps to understand how their customers who need extra help feel about the use of their data.

To support wider data sharing and supporting customers we have moved away from asking customers consent for recording Priority Services data and instead record under Substantial Public Interest. This has facilitated the wider sharing of data between water and energy and the Support for All which we would like to continue. We support engaging with customers around wider data sharing, with the understanding that this does not cause barriers and potential customer detriment.

- 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 support the continued challenge for innovation and understanding our customers more. When setting minimum standards, rather than detailed expectations these can be open for interpretation which can lead to varying level of service between water companies.

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

In 2018 we launched our first Customer Inclusivity Strategy 2018-2030, where we set out of long term aims for supporting customers. This covers both our support for customers who need extra help both financial and non-financial. Our strategy details the support that we offer our customers and how we will measure our performance. We updated this strategy in

2023, and we will continue to review alongside this guidance. The updated strategy can be downloaded here [Our Customers \(nwg.co.uk\)](https://www.nwg.co.uk/our-customers)

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

We agree with the approach.

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 support the proposed approach and timelines for PSR registers in a separate standards document.