

December 2023

Responses and conclusions to 'Service for all: Ofwat's draft vulnerability guidance for water companies supporting customers who need extra help'

About this document

This document sets out our responses and conclusions on final guidance for all water companies in supporting household customers in England and Wales and non-household customers in Wales who need extra help accessing water and wastewater services. This follows our consultation on draft guidance earlier this year.

Contents

1. Our July 2023 consultation	3
2. Summary of responses	4
3. Next steps	29
Appendix 1 – Changes to proposed guidance since our July 2023 consultation	30
Appendix 2 – Diagram: process for developing vulnerability strategies and PSR standards	35

1. Our July 2023 consultation

In July 2023 [we consulted on introducing new guidance](#) for water companies supporting customers who need extra help. We proposed that this guidance would set expectations and give clarity to companies in relation to our new customer-focused licence condition. We sought to establish a direction of travel for the future of vulnerability support in the water sector, and empowering water customers and the third sector.

The draft guidance was structured around five objectives:

1. High standard of service and support
2. Inclusive by design
3. Identifying customers
4. Recording needs
5. Vulnerability strategies

We proposed the guidance would apply to all water-only and water and wastewater companies (including new appointees) in supporting household customers in England and Wales and non-household customers in Wales.

2. Summary of responses

We received responses from 31 organisations. We also received responses from 3 individuals. We have [published all responses on our website](#).

We provide in the table below the list of organisations that responded to our consultation.

Table 1 – Respondents to our July consultation

Water companies					
Affinity Water	Anglian Water	Dŵr Cymru	ESP Water	Hafren Dyfrdwy	Independent Water Networks
Leep	Northumbrian Water	Portsmouth Water	SES Water	Severn Trent	South East Water
South Staffordshire Water	South West Water	Southern Water	Thames Water	United Utilities	Wessex Water
Yorkshire Water					
Other organisations					
Age UK	CCW	Christians Against Poverty	Institute of Customer Service	Independent Networks Association	Mencap
Money Advice Trust	Money and Mental Health	Morgan Ash	Plain Numbers	Scope	Vulnerability Registration Service

In the rest of this chapter, we summarise the consultation responses, grouping them according to our consultation questions. For each question, we provide a summary of what we said in the consultation document, stakeholders' answers, and our high-level response to those answers explaining how we intend to proceed.

2.1 Responses and conclusions to Question 1

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

2.1.1 What we said

We proposed to retain our vulnerability definition from our 2016 [Vulnerability Focus](#) report, where we said that a customer whose circumstances make them vulnerable can be defined as:

A customer who due to personal characteristics, their overall life situation or due to broader market and economic factors, is not having reasonable opportunity to access and receive an inclusive service which may have a detrimental impact on their health, wellbeing or finances.

We considered that our 2016 definition remained relevant and useful. Therefore, we proposed to include this definition of vulnerability in our final guidance.

2.1.2 Respondents' view

Overall, respondents agreed that we should retain our current definition. Most respondents felt that our definition should be retained in its current state. Many correspondents said that the definition was useful and accurate, and others noted that changing the definition could be disproportionately disruptive.

Other respondents highlighted potential improvements to the definition. Some respondents suggested small tweaks to aspects of our definition; for example, to make clearer that vulnerability can be a temporary or transient state. Some argued that our definition could go further in defining certain terms within it, e.g. 'inclusive service'. A non-company respondent argued that the current definition did not sufficiently emphasise the fact that poor service by firms can make customers vulnerable.

2.1.3 Our response

We will retain our previous definition of vulnerability and include it in our final guidance.

We note the views of respondents who felt that the definition could be improved. However, we believe that the areas of feedback can be most effectively incorporated into the rest of our guidance.

We will continue to monitor any future developments of other regulators' vulnerability definitions.

2.2 Responses and conclusions to Question 2

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

2.2.1 What we said

In our guidance, we used the following terms:

- We used the term **vulnerability** to refer to the overall topic. This provides clarity for stakeholders and companies and reduces potential for confusion.
- We used the term **extra help** to describe the many ways in which companies can provide tailored support for certain customers.
- We used the term **customers who need extra help** to describe customers who without this tailored support may not have reasonable opportunity to access and receive an inclusive service.

We said that using these terms in our guidance was preferable to 'vulnerable customers' or 'vulnerable circumstances', which may be perceived as less inclusive. We argued that 'extra help' was a more straightforward way of talking about these services in our guidance, and placed the focus on the help that companies can provide rather than the underlying need.

2.2.2 Respondents' view

Overall, respondents agreed with our approach to nomenclature, including our use of the term 'extra help'. The vast majority of respondents agreed with our proposed shift in how we describe services and said that this would be a positive move for the sector.

Two companies said that 'extra support' was a preferable term to 'extra help'. One non-company respondent said that 'extra help' did not emphasise the fact that companies needed to think ahead to anticipate needs before they arise. One respondent suggested that we needed to talk specifically about 'exclusion' as part of our work.

Some respondents noted that while 'extra help' was a useful term, it would not be the appropriate customer-facing terminology in all circumstances.

2.2.3 Our response

In our final guidance we have retained the approach to nomenclature from our draft guidance, including the use of the term extra help.

We emphasise that this consultation chiefly described how Ofwat, in our vulnerability guidance, would describe vulnerability and the extra help needs of customers. It is right that companies should carefully consider how best to describe services and support when communicating with their customers. It is for companies to decide what terms to use, however we hope that the industry will consider increasing use of the term 'extra help' moving forward.

2.3 Responses and conclusions to Question 3

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

2.3.1 What we said

We said that our guidance would apply to all water companies', including new appointees, treatment of household customers in England and Wales. It would also apply to their treatment of non-household customers where they are not supplied by a retailer; in practice this means all but the largest business customers of Welsh companies, and business customers of new appointees in both England and Wales.

We also said that while the objectives and expectations set out in the guidance would be equally applicable to all customers set out above, in practice the guidance may be applied slightly differently in some circumstances.

We said that companies – particularly new appointees, and those supplying business customers where they are not supplied by a retailer – should set out explicitly in their vulnerability strategy where an alternative approach to meeting the expectations in the guidance will be taken.

2.3.2 Respondents' view

All respondents agreed with our proposed approach in this area.

This included all responses from new appointees and their representative organisation. It also included both companies operating wholly or mainly in Wales.

2.3.3 Our response

Our final guidance will make clear which companies it applies to, and which of those companies' customers it applies to.

We will continue to engage with new appointees and companies operating wholly or mainly in Wales to understand their plans for meeting the guidance, including any potential approaches specific to their context.

2.4 Responses and conclusions to Question 4

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

2.4.1 What we said

We said that improving outcomes for customers who need extra help is a key priority for Ofwat.

We also noted that we are required to protect the interests of certain groups of customers by the Water Industry Act 1991, and that both the UK Government and Welsh Government's strategic policy statements require us to seek improved outcomes for customers who need extra help.

We said that issuing new guidance would allow us to challenge poor performance in the sector, and potentially stretch companies to make further improvements.

2.4.2 Respondents' view

The vast majority of respondents believed that our new guidance would have a positive impact on the experiences of customers who need extra help.

Respondents said that the guidance provided helpful clarity on regulatory expectations. Some said that it would reinforce recent good progress in the sector, and that the proposed

guidance brought together several years of learning into one place. This could help companies check their own progress.

Some respondents said that the principles-based approach in the guidance would allow companies to innovate to find better solutions to improving support. Some said that by giving Ofwat a clear framework for holding companies to account, it would have a positive effect on company behaviour.

One non-company respondent said that Ofwat needed to do more to define 'outcomes' for customers who need extra help, and that Ofwat should be more explicit in asking companies to compare the outcomes for these customers (and sub-groups of these customers) to those of customers as a whole.

Another non-company respondent said that Ofwat's proposed approach reinforced an unhelpful split between financial and non-financial vulnerability. They also argued that the move to a principles-based approach would be a major change for companies and could be challenging.

2.4.3 Our response

We are pleased that the vast majority of respondents agreed that the guidance would support improved experiences for customers who need extra help.

We note the point that it is important that companies monitor key outcomes for customers who need extra help and make direct comparisons to outcomes for customers as a whole. This was reflected in our proposed minimum expectation 1.5: 'Companies should use a range of data to monitor the effectiveness of their extra help services, and the satisfaction levels of customers who have made such needs known'. That minimum expectation set out that:

As well as monitoring the effectiveness of specific extra help services, companies should also seek to monitor the overall satisfaction levels of customers who need extra help. This data should be benchmarked against the wider customer base to ensure customers who require extra help are no less satisfied than other customers.

We think this minimum expectation sufficiently highlights the need to monitor both satisfaction levels and wider outcomes around the effectiveness of services.

Regarding financial and non-financial vulnerability, we believe that it is important to be precise about which types of harm specific company activities are intended to mitigate. We therefore think it is appropriate to have separate guidance covering financial and non-financial vulnerability. However, as our consultation document acknowledged, we agree that

there are important overlaps between these different types of harm, and we hope that our guidance will support co-ordinated action to address all types of harm.

2.5 Responses and conclusions to Question 5

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

2.5.1 What we said

We said that, in developing our draft guidance, we had engaged extensively with a wide range of stakeholders and had sought to understand their views on the most important issues facing customers who need extra help.

We also said that as well as building on our previous regulatory approach, we wanted to consider new or developing areas where we could set out clear expectations for the first time. For these reasons, it was important to ask stakeholders whether we could learn any lessons from other regulated sectors.

2.5.2 Respondents' view

A large proportion of respondents felt that our proposed guidance was in line with best practice from other regulated sectors. Several respondents acknowledge the fact that the draft guidance had already sought to build on developments from across other sectors.

Other respondents suggested further examples of regulation that we could consider as we move forward. These included:

- The FCA's new Consumer Duty
- Ofgem's recent vulnerability strategy
- The Essential Services Commission in Victoria, Australia, and their 'Getting to fair' strategy

2.5.3 Our response

In developing our draft guidance, we carefully considered work being carried out by other regulators. Looking at responses as a whole, we did not find any specific areas where it

appeared incorporation of further lessons was necessary at this stage. However, we will continue to closely monitor developments in other regulated sectors, including via the UK Regulators' Network, and will consider implications for our regulatory approach in the longer term.

2.6 Responses and conclusions to Question 6

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

2.6.1 What we said

We said that we proposed to take account of how a company had considered our guidance in its activities when considering compliance with our new customer licence condition. We said that the objectives and expectations set out in our vulnerability guidance would be most directly relevant to our customer-focused licence condition G4.5¹, "The Appointee understands the needs of customers of the Appointee and provides appropriate support, including appropriate support for customers in vulnerable circumstances, and including during and following incidents," but that it may also be relevant to other parts of our licence condition.

We also set out our proposed approach to monitoring company performance in this area. This will include requiring companies to develop and implement vulnerability strategies, which include the information or data they will use to understand whether the strategies are on track. We also said that we propose to continue collecting data on priority services register (PSR) reach and attempted and successful contacts beyond the end of the 2020–25 price control period. Finally, we said that we would use a range of qualitative insights to understand how companies have supported customers who need extra help.

¹ We consulted on modifying company licences to introduce a new customer focussed licence condition in October 2023. Condition G4.5 was re-numbered as Condition 3.5 as set out in the consultation: <https://www.ofwat.gov.uk/wp-content/uploads/2023/10/Consultation-under-sections-13-and-12A-of-the-Water-Industry-Act-1991-on-proposed-licence-modifications-to-introduce-customer-focused-principles-for-all-water-companies.pdf>

2.6.2 Respondents' view

Most respondents agreed with our proposed approach to enforcing the guidance. Some companies said they welcomed the fact that the guidance provided the clarity we had previously promised in support of our customer-focused licence condition.

Some respondents said that while they agreed with our proposed approach in principle, they would welcome further detail around enforcement as we move forward. One company said that there should be a formalised change management and governance protocol set up to maintain and evolve the guidance.

One company said they felt that Ofwat should take account of current regulatory reporting burdens before introducing any new requirements. Another company said that Ofwat should consider amending the current two-year PSR data checking cycle in its future reporting requirements, to prevent customers having to repeat the same information to multiple companies in different sectors on a regular basis.

Several respondents said that they would welcome the inclusion of examples of good or poor practice being included in the guidance, as this would help to show how companies could comply.

2.6.3 Our response

We are pleased that most respondents are comfortable with our proposed approach to take account of how a company has considered our guidance in its activities when considering compliance with our new customer licence condition.

As noted in our recent [responses document](#) following our customer-focused licence condition consultation, we intend to provide further guidance on the annual reporting requirement in the licence. These reports will enable us to take a more targeted monitoring approach based on water companies' performance in this area. This may take the form of 'deep dives' and / or research where we have evidence of potential customer detriment. We will keep our monitoring approach under review and look for opportunities to promote proportionality and work collectively with partners and wider stakeholders to minimise the burden on companies where appropriate.

We will consider our future approach to reporting around the PSR, including the requirement to check data every two years, as we develop our new PSR standards. This will include a public consultation.

In our draft guidance, we included some examples of ways in which companies could seek to achieve our minimum expectations. For example, under proposed minimum expectation 1.5,

we set out that 'companies should use a range of data from both internal and external sources to track the effectiveness of the extra help they provide', and then provide some examples of what this might include. We have carefully considered whether to include longer 'case study' type good practice examples in the final guidance. On the one hand, these types of examples could help to bring certain aspects of our guidance to life. On the other, what may be considered exemplary practice in 2023 may within a few years become seen as unremarkable. We want this guidance to set out our enduring expectations around a topic where there is significant scope for innovation, and therefore we have decided not to include these types of case studies. However, when we publish our assessment of water companies' vulnerability strategies, we will highlight examples of good practice that other companies can learn from. We would also encourage companies to share information and learn from each other.

2.7 Responses and conclusions to Question 7

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

2.7.1 What we said

We said that we would structure our guidance around five clear objectives:

1. High standard of service and support
2. Inclusive by design
3. Identifying customers
4. Recording needs
5. Vulnerability strategies

We explained what each of these objectives means. Each of these objectives would be supported by more detailed minimum expectations.

2.7.2 Respondents' view

The vast majority of respondents agreed with our proposed objectives and said they covered the key areas of support.

Several respondents said that there should be more focus on accessibility as a theme in our objectives. One non-company respondent said they felt communications was missing from our objectives, although not our minimum standards.

Several respondents flagged specific issues regarding individual objectives and their implementation via minimum expectations. We have addressed these as part of our conclusions to question 8.

One company said that rather than aiming for customers to be 'happy with the service', it would be more appropriate to aim for services to 'meet with their expectations'.

2.7.3 Our response

We are pleased that the vast majority of respondents agreed with our proposed objectives. Our final guidance will therefore be built around these same five objectives.

We will update our 'what this means' table to make clear that accessibility and communications should be considered as central elements to achieving the objectives.

We disagree with the suggestion to move away from suggesting that customers should be 'happy with the service' provided via extra help support. While the aim of this support is clearly to create equitable and inclusive outcomes, rather than to provide a level of service better than that received by customers as a whole; ensuring that these customers are happy with the service they receive is a basic requirement.

2.8 Responses and conclusions to Question 8

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

2.8.1 What we said

We set out a list of proposed minimum expectations, which would support each of our objectives. We hoped that these expectations would provide clarity for customers, companies and stakeholders about how we expect companies to work towards meeting our objectives. We provided detail to support each of the minimum expectations.

2.8.2 Respondents' view and our response

The below table summarises respondents' views on each of our proposed minimum expectations, and our response.

Respondent's view	Our response
<p>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.</p>	
<p>The vast majority of respondents agreed with this expectation and the supporting explanation.</p> <p>Some respondents noted that translation services can be expensive and that there was some ambiguity about whether translation services are required for all communications.</p> <p>One company suggested that a separate objective covering support during incidents would be useful. A non-company respondent said that companies should be required to consult widely to ensure disabled customers' needs are accounted for during incidents.</p> <p>One company said that mentioning adaptations around different ways to pay created an unhelpful overlap with our paying fair guidance.</p> <p>Two companies said that siting new meters in places that are accessible to the customer may not always be the best solution, e.g. when installing smart meters.</p> <p>One non-company respondent said that Easy Read should be added to the list of examples of adaptations, in line with Ofgem's recent guidance around pre-payment meter installation.</p>	<p>We note that translation of all customer communications into every language is unlikely to be practical or proportionate in all cases. However, we encourage companies to carefully consider what adaptations are possible for customers who are unable to communicate in English or Welsh. As the list of adaptations is clearly exemplary rather than directive, we do not believe there is a need to amend the list.</p> <p>While we think that the principle behind this minimum expectation applies both during and outside incidents, we agree that companies should consult with expert stakeholders in designing their support; however, we believe this is covered sufficiently elsewhere including under expectation 5.1.</p> <p>We believe that highlighting different customer communication arrangements, including around third-party billing, are appropriate to include in this guidance. We believe this is well-aligned and complementary to our Paying Fair guidance.</p> <p>Meter siting is already covered in our previous 2013 guidance on Services for disabled, chronically sick or elderly consumers, and therefore companies should already be acting in accordance with this. We note that technology around smart metering has developed in the last decade, therefore our draft wording could be improved to focus on the outcome we are seeking to promote rather than the precise solution to achieve it. Therefore, we have replaced this example in the list with "Ensuring that customers are able to check their water consumption at reasonable intervals via accessible channels." This wording is also adapted from our 2013 guidance but is less directive about the solution to achieve this.</p> <p>We agree that Easy Read is a good example of an inclusive service adaptation, and we will include in in the list of examples in our final guidance.</p>
<p>Minimum expectation 1.2: Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.</p>	
<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had</p>	<p>We are pleased that respondents did not disagree with this expectation.</p>

<p>no comments. No respondents raised substantive issues.</p>	<p>As discussed below, consultation responses to proposed expectation 5.3 indicated that there was a need to be clearer about that expectation. On balance, we felt that setting expectations in this area is best served by a single expectation covering both areas, and so we have merged the content of expectation 5.3 into this expectation.</p> <p>As discussed immediately below, we have also added content covering some expectations previously covered by minimum expectation 1.3 under this expectation.</p>
<p>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.</p>	
<p>There were a broad range of views on this question. Some respondents welcomed the idea of compensating customers who do not receive the extra help they require.</p> <p>At the same time, many respondents (largely but not exclusively water companies) felt that this expectation would cause challenges.</p> <p>Some of these respondents felt that the principle of creating separate compensation arrangements for certain groups of customers was unfair or would lead to perverse outcomes e.g. customers signing up for extra help who did not require it.</p> <p>Others felt that including this expectation in our list of minimum expectations would lead to uncertainty in the regulatory landscape, mainly between this guidance the guaranteed standards scheme (GSS).</p>	<p>We strongly believe that when a customer has asked for extra support, they should have confidence that it will be provided for them when required, especially during incidents.</p> <p>Such extra support is not just a 'nice to have' or an added bonus but is absolutely essential in ensuring that all customers receive an inclusive service.</p> <p>Where this support is not provided, we believe that customers have a right to seek redress, and companies should make it simple for customers to pursue this. We encourage all companies to consider the best way to do this, for example, by having clear policies on providing discretionary payments to customers who have been let down in this area. That is why we included this expectation in our draft guidance.</p> <p>At the same time, we understand that there may be unhelpful interplay between a minimum expectation in this area, and other regulatory requirements such as GSS.</p> <p>For this reason, in our final guidance, we will remove this expectation. However, we will amend our current expectation 1.2 to include wording around making it easy for customers who have not been provided with adequate extra help to contact their company and seek redress.</p> <p>We will also engage closely with the current CCW work to review the GSS, and will make clear our view that consistent redress for customers who have requested extra help but not received it should be under consideration.</p> <p>We will monitor developments in this policy area closely to ensure that sufficient progress is being made towards the improvements we expect to see.</p>
<p>Minimum expectation 1.4: Companies should seek to continuously improve the service they provide to customers who need extra help. This may include finding innovative ways to design or implement services.</p>	

<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had no comments.</p> <p>One non-company respondent said that it was not clear what incentives are in place to support innovation and progress.</p>	<p>In PR19 we introduced an innovation fund to support new approaches to better meet the need of customers, society and the environment, and are committed to continuing with an innovation fund during 2025-2030. There is opportunity within this, as well as in how companies deliver their PR24 commitments, to innovate in order to continuously improve their services to customers, including those who need extra help.</p> <p>We will therefore not amend the expectation in the final guidance.</p>
<p>Minimum expectation 1.5: Companies should use a range of data to monitor the effectiveness of their extra help services, and the satisfaction levels of customers who have made such needs known.</p>	
<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had no comments.</p> <p>Two respondents said that it was important that outcome measurement went beyond solely measuring customer satisfaction.</p> <p>One non-company respondent said it was important that this kind of monitoring take into account the experiences of customers with learning disabilities.</p>	<p>We agree that companies' monitoring should go beyond just measuring satisfaction and should also take into account the experiences of specific groups of customers who may need extra help, including those with learning disabilities. We are confident that the current wording of the expectation provides sufficient clarity in this regard.</p> <p>We will therefore not amend the expectation in the final guidance.</p>
<p>Minimum expectation 2.1: Companies should communicate with customers in a way that is easy to understand to a diverse range of audiences. This should be underpinned by relevant insights, which may include research, engagement and accreditation.</p>	
<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had no comments.</p> <p>Several respondents said that more could be done to make clear that inclusive design was about more than just communications.</p> <p>Two respondents said that inclusive design approaches should take into account numeracy levels as well as literacy levels.</p>	<p>We agree that designing services in an inclusive way goes beyond communications, and that this should be made clearer in our guidance. We will therefore amend our final guidance to make this point clearer.</p> <p>We will also update our final guidance to make clear that inclusive design approaches should take into account numeracy levels as well as literacy levels.</p>
<p>Minimum expectation 2.2: Companies should offer their customers a range of ways to interact and communicate. This includes allowing customers to opt for third party billing where appropriate.</p>	
<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had no comments.</p> <p>One company said that it was unclear what we meant by 'third party billing'.</p>	<p>By third party billing, we mean giving customers the option to allow a specific trusted individual – potentially a friend or family member – the ability to manage their account for them. We will update our final guidance to make this clearer.</p>
<p>Minimum expectation 2.3: Companies should consult with CCW, and engage with stakeholders and other customer representatives, when making significant changes to their proposed service offering around vulnerability.</p>	
<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had no comments.</p>	<p>We agree that knowledge-sharing across the sector is important. That is one reason why we propose to include G.3.4 in our licence condition principles of customer care:</p>

<p>Two respondents said that there was a role for Ofwat in promoting further knowledge-sharing and collaboration across the sector.</p> <p>One non-company respondent said that this consultation should include engagement with customers with direct lived experience of particular extra help needs.</p>	<p>'The Appointee learns from its own past experiences, and shares these with relevant stakeholders. The Appointee also learns from relevant stakeholders' experiences and demonstrates continual improvement to prevent foreseeable harm to its customers.'</p> <p>We will continue to reflect on knowledge-sharing across the sector and how we can continue to support it.</p> <p>We agree that companies should consider the role of lived experience experts as part of their approach. This may not be appropriate in all circumstances, but we believe there is sufficient support for this approach across the whole of our guidance, including the expectations under objective 5.</p> <p>We will therefore not amend the expectation in the final guidance.</p>
<p>Minimum expectation 3.1: Companies should take active steps to identify customers who require extra help who have not yet been identified.</p>	
<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had no comments.</p> <p>Some respondents gave suggestions of further types of organisations that could be listed as examples, such as national charitable organisations and social care providers.</p>	<p>We will amend our list of example organisations to include the suggested examples.</p>
<p>Minimum expectation 3.2: Companies should take steps to proactively increase customer awareness of the extra help available to those who need it.</p>	
<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had no comments.</p> <p>One company suggested that Ofwat, industry bodies, and other sectors should develop national campaigns to promote the PSR.</p> <p>One non-company respondent said that Ofwat should encourage firms to explain and expand the range of support services that can be provided to authorised third parties.</p>	<p>We believe that the merits of any national campaign on the PSR are best considered outside the guidance, though clearly any such campaign would be expected to support achievement of the guidance's minimum expectations.</p> <p>We agree that authorising third parties is an important way that companies can support customers who need extra help. We believe this point is covered sufficiently by minimum expectation 2.2.</p> <p>We will therefore not amend the expectation in the final guidance.</p>
<p>Minimum expectation 3.3: Companies should train their staff to spot potential requirements for extra help, even when a customer has not previously declared it.</p>	
<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had no comments.</p> <p>One non-company respondent noted that awareness and understanding of customers' extra help needs is</p>	<p>We agree that understanding of vulnerability issues should be built widely within companies. Doing this is a prerequisite to effective action against many of the minimum expectations in our guidance, especially around vulnerability strategies. Therefore, we do not believe this needs to be set out as a separate requirement.</p>

<p>not just the responsibility of customer-facing staff but should be spread across the business.</p> <p>Another non-company respondent said that Ofwat should prescribe that this training should receive input from consumer groups, charities, or people with lived experience.</p>	<p>We agree that input from consumer groups, charities, or people with lived experience can be a useful way of making training well-informed and impactful. We do not think it is necessary to specify this within our guidance although we certainly encourage all companies to consider this.</p> <p>We will therefore not amend the expectation in the final guidance.</p>
<p>Minimum expectation 3.4: Companies should actively consider how they can reduce communication burdens on customer who need extra help; this could include establishing data sharing arrangements with partner organisations.</p>	
<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had no comments.</p> <p>One non-company respondent argued that Ofwat should make clear in its guidance that it does not promote data sharing arrangements where customers do not have control of which organisations their data is shared with.</p>	<p>We agree that it is important that customers are well-informed about how their data will be used and shared. We think that minimum expectation 4.4 (including any revisions) should cover this point.</p> <p>We will therefore not amend the expectation in the final guidance.</p>
<p>Minimum expectation 4.1: Companies should take appropriate steps to record customers' extra help needs. These records should be held securely and in line with wider data protection requirements.</p>	
<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had no comments.</p> <p>One non-company respondent noted the importance of companies being able to record customer needs outside the list of 'needs codes' that companies use to manage their PSRs.</p> <p>Another non-company respondent argued that companies should review their PSR registration journeys across different channels to ensure they are accessible.</p>	<p>We agree that it is important that companies have the right tools and processes to record complex needs that may sit outside existing PSR needs codes. We believe this expectation covers this point adequately, but we will consider this further as we develop our PSR standards.</p> <p>We agree that companies' processes for registering new PSR customers should be easy and accessible. Taken together, we believe the expectations set out under Objectives 2, 3 and 4 cover this point well.</p> <p>We will therefore not amend the expectation in the final guidance.</p>
<p>Minimum expectation 4.2: Companies' records should be reviewed regularly to ensure they are up to date.</p>	
<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had no comments. No respondents raised substantive issues.</p>	<p>We are pleased that respondents did not disagree with this expectation. We will not amend the expectation in the final guidance.</p>
<p>Minimum expectation 4.3: Companies should consider how their records of customers' needs can be designed in a way that can help deliver wider benefits to their customers; for example, reducing communication burdens for customers through data sharing.</p>	
<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had no comments. No respondents raised substantive issues.</p>	<p>We are pleased that respondents did not disagree with this expectation. We will not amend the expectation in the final guidance.</p>
<p>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.</p>	

<p>Most respondents did not have comments on this expectation.</p> <p>However, some respondents said there was a potential conflict between this expectation and the recent progress that has been made to establish PSR data sharing agreements between the energy and water sectors. These respondents noted that companies in both sectors have moved away from using consent as the legal basis for data sharing under GDPR, in favour of using a substantial public interest basis. These respondents said that if customers do not support these data sharing arrangements, then the progress made could be undone.</p> <p>Some respondents questioned the value of research in this area.</p>	<p>We welcome the important progress that has been made around PSR data sharing in recent years. We have no intention of making such arrangements more complex or difficult to extend further.</p> <p>In developing this proposed minimum expectation, our intention was not to promote a specific legal basis for PSR data sharing. The decision on which legal basis is most appropriate for any data sharing is for companies to make, taking into account GDPR considerations and guidance issued by the ICO.</p> <p>At the same time, the ICO's Data Sharing Code of Practice makes clear that individual data subjects have rights around the use of their data. It states that "[data controllers] must have policies and procedures that allow individuals to exercise their rights easily, and [they] must set these out in [their] data sharing agreement;" and that "[data controllers] must provide details of how to exercise these rights in the privacy information [they] issue to individuals".</p> <p>The Code of Practice goes on to state that it is good practice to "use any significant objections, negative comments or other expressions of concern you receive when you inform people about your data sharing, to help you review your data sharing;" and to "consider setting up focus groups to explore individuals' concerns, if you are carrying out large-scale data sharing operations."</p> <p>Clearly the precise nature of individuals' rights will vary depending on which legal basis is used to share data. However, the ICO's guidance is clear that individual data subjects should not be cut out of the picture when data sharing occurs.</p> <p>In practice, this is likely to mean that water companies need to make clear to customers how their data will be used and shared – and the choices available to them (which may vary depending on the legal basis used) – in an accessible manner.</p> <p>We will amend this expectation in our final guidance to make clear that it does not indicate any preferred legal basis for data sharing. We will emphasise more clearly that this expectation is about making clear to customers how their data will be used, including any choices available to them.</p>
<p>Minimum expectation 5.1: Companies should develop and maintain a vulnerability strategy setting out how they plan to support the extra help needs of their customer base.</p>	
<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had no comments.</p>	<p>We provide responses to points around the content and timing of vulnerability strategies in section 2.10.3 below.</p>

<p>One respondent said it would be helpful to provide further clarity on the meaning of short, medium and long term in strategies.</p> <p>One company raised concerns about the proposed timelines for developing vulnerability strategies.</p> <p>One non-company respondent said that the guidance could make clearer that companies should have senior level vulnerability champions.</p>	<p>We agree that using senior vulnerability champions are one way that companies can improve visibility and understanding of vulnerability issues within companies, and we would encourage all companies to consider the merits of this approach. However, we do not believe there are significant benefits from mandating this through guidance.</p> <p>We will therefore not amend the expectation in the final guidance.</p>
<p>Minimum expectation 5.2: Companies should take steps to understand the likely underlying requirements for extra help in their areas.</p>	
<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had no comments.</p> <p>One respondent noted that this type of analysis was likely to be most useful in understanding longer term needs, rather than transient needs.</p>	<p>We agree that understanding the underlying requirements for different types of extra help is likely to require different types of analysis, and some will be easier to analyse than others. We do not think our draft expectation precludes this nuanced approach.</p> <p>We will therefore not amend the expectation in the final guidance.</p>
<p>Minimum expectation 5.3: Companies should publish their service commitments for customers who have declared an extra help need so that all customers can understand the nature of help available.</p>	
<p>The vast majority of respondents either agreed with this expectation and the supporting explanation or had no comments.</p> <p>One company noted that they would need to include caveats around what customers could expect in a 'force majeure' situation.</p> <p>Two respondents said that Ofwat should make clearer that the service commitments should be presented to customers in customer-friendly formats, i.e. separate to vulnerability strategies.</p>	<p>While we agree that in a 'force majeure' situation, the nature of support given to customers who need extra help may need to be adapted or prioritised. However, we would be concerned if companies were to caveat their service commitments in a way that diluted them or made them less useful for customers.</p> <p>In addition, based on the responses received, we believe there is a need to be clearer about the meaning of this expectation. This expectation is not about informing customers about high-level performance commitment-type targets, or the detail of vulnerability strategies. The focus of the expectation is on companies being clear with individual customers who have asked for extra help, what type of extra help they will receive. We recognise that this could have been clearer in our draft guidance.</p> <p>With this in mind, we think that some of these points are already covered under minimum expectation 1.2. To avoid duplication, we will remove expectation 5.3 from our final guidance and ensure that expectation 1.2 covers any residual points that need to be carried over from expectation 5.3.</p>

2.9 Responses and conclusions to Question 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?

2.9.1 What we said

We said that one benefit of guidance is that it can encourage companies to take an outcome-focused approach to compliance. We said that guidance can help to promote innovation while also keeping customers protected.

2.9.2 Respondents' view

The vast majority of respondents agreed that the draft minimum expectations would provide a good balance between providing minimum standards and promoting innovation.

Several respondents said that the expectations could go further in specifying that companies should go further in innovating and collaboration. At the same time, one company said that there was a risk that objective 1.4 could over-emphasise continuous improvement compared to basic service.

One non-company respondent said that further examples could be given of accreditations relating to vulnerability.

2.9.3 Our response

We are pleased that the majority of respondents agreed that our draft expectations would provide a good balance.

We do not agree there is a need to provide further specificity around how companies should innovate. The role of the regulator is to provide an environment that incentivises and promotes innovation, rather than directing it. In drafting our guidance, we have sought to create such a regulatory environment and we hope that companies will continue to find new ways to tackle the issues facing customers who need extra help. At the same time, Ofwat is continuing to promote innovation in the water sector more broadly.

We do not plan to include specific examples of accreditation schemes in our final guidance. However, minimum expectation 2.1 provides clear support for companies using accreditation schemes as a means of companies to benchmark their service against economy-wide standards.

2.10 Responses and conclusions to Question 10

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

2.10.1 What we said

We said that we expected all companies to develop a vulnerability strategy setting out their approach to delivering extra help in the short, medium and long term. The strategies should explicitly set out how the company plans to meet each of the minimum expectations, and what information and data will be used to understand if the strategy is on track.

We said that the strategies should be developed using both customer and stakeholder input and feedback, and that they should be published on the company website and in accessible formats.

We said that companies should publish their vulnerability strategies by the end of June 2024.

2.10.2 Respondents' view

All respondents agreed that requiring companies to publish vulnerability strategies was a positive step.

There were a range of views around the proposed publication timelines. Many stakeholders agreed that end of June 2024 was a pragmatic timescale for publication. However, some non-company respondents argued that this deadline was too far away, and that Ofwat should challenge companies to develop strategies more quickly.

By contrast, a number of respondents, mainly companies, said that the end of June deadline was too soon. For some respondents this was because of competing priorities such as PR24. Other respondents believed that it was important that our proposed PSR guidelines should be published first, so that companies could use these to inform their vulnerability strategies.

One company said that the publication of vulnerability strategies should coincide with the beginning of AMP8 (April 2025).

These timing and choreography points were also raised in relation Question 12 of our consultation.

Beyond timing, one respondent said that they would welcome further clarity on how the licence will be managed in future, including governance around future changes.

2.10.3 Our response

We are pleased that all respondents agree with the proposal for companies to develop vulnerability strategies.

We have carefully considered the points made about timing, and choreography around the development of vulnerability strategies and PSR standards, as well as wider developments such as PR24. On balance, we believe that end of June 2024 is a reasonable timeframe for companies to develop vulnerability strategies that meet the expectations we set out in our draft minimum expectations.

We also believe that the development of vulnerability strategies should come before we develop PSR standards for the sector. In reaching this decision, we have needed to balance several considerations.

Firstly, we think that our PSR standards will be improved by taking account of what we have learned from seeing companies' vulnerability strategies. In doing so we can build on existing best practice within the sector, which will be captured and shared through the vulnerability strategies. If we were to develop PSR standards before we had seen companies' vulnerability strategies, this would risk us setting the standards either too low (where the standards did not properly reflect good service for sector, reducing their impact as a regulatory measure) or too high (where the standards set unreasonable expectations of companies, leading to unfair levels of reputational harm when standards aren't met).

Secondly, we acknowledge that to develop and finalise their vulnerability strategies, companies need to understand the regulator's expectations. We are clear that the key regulatory driver for the development of companies' strategies should be compliance with our vulnerability guidance. The PSR standards will provide a degree of further clarity on our expectations around how companies should operate and further develop their PSRs; however, this is only one element of companies' support for vulnerable customers, and we are clear that in developing the standards we will seek to build on the existing best practice of the sector, while also maintaining strong continuity with our previous regulatory approach, including our PR19 performance commitment. Therefore, we believe it is possible for

companies to develop high quality vulnerability strategies before we finalise our PSR standards.

At the same time, we accept that once the PSR standards have been finalised, companies may need to revisit their vulnerability strategies to ensure that they will support the delivery of our PSR standards. They may also wish to revise their vulnerability strategies in response to feedback from Ofwat's assessment of their strategies, as well as feedback from CCW and other stakeholders.

For these reasons, our expectation remains that companies should develop vulnerability strategies by the end of June 2024. However, in response to feedback from consultees, we will update our guidance to say that these should be draft strategies. We will then expect companies to publish and submit to Ofwat final vulnerability strategies by the end of June 2025, which will take account of our finalised PSR standards, as well as Ofwat's assessment of their draft strategies plus any feedback from CCW and other stakeholders. These final vulnerability strategies should explain clearly where changes have been made from the draft strategy and why.

This does not mean companies can wait until June 2025 to follow our guidance. We expect companies to comply with our guidance immediately, and to set out how they are doing so in their draft vulnerability strategy.

At Appendix 2 we have included an explanatory diagram showing the forward timescales for development of vulnerability strategies and PSR guidance.

2.11 Responses and conclusions to Question 11

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

2.11.1 What we said

We said that companies need to deliver all our expectations in full. We said that companies could still take different approaches to meeting our expectations where they have evidence that allows them to show why an alternative approach better meets the objectives in our guidance. Companies take these alternative approaches need to clearly demonstrate their reason for departing from the guidance.

We also said that we expect water companies to comply with other legal and regulatory requirements which apply at the relevant time.

Due to a drafting error, this consultation question did not appear in the list of questions on page 2 of our consultation, though it did appear in the relevant section of the main document on page 24. We wrote to all respondents to highlight the error and provided further time to allow responses to this question.

2.11.2 Respondents' view

The vast majority of respondents welcomed our proposed approach to how companies should use the guidance.

One non-company respondent added that they would welcome Ofwat clarifying how its expectations relate to companies' obligations under the Equality Act.

2.11.3 Our response

In our final guidance we will retain our proposed approach to how companies should use the guidance.

We will not provide further commentary on how companies should go about meeting the requirements under the Equality Act. It is for companies to decide how best to go about meeting these legal duties.

2.12 Responses and conclusions to Question 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?

2.12.1 What we said

We said that improving the reach, accuracy and utility of priority services registers (PSRs) is an area of considerable scope for innovation. We said that we did not want to stand in the way of this innovation, and that our outcome-focused approach to setting out our expectations would support future innovation in this area.

At the same time, we had heard from stakeholders that there needed to be a degree of specificity around PSR requirements to protect customers in the here and now, especially in the context of the current PSR performance commitments lapsing from April 2025.

We therefore proposed to publish PSR standards which would sit alongside our main vulnerability guidance but would be separate to it, allowing us to, through consultation, update, remove or replace the standards without amending our guidance. The PSR standards would cover areas including:

- Proportion of households on the register (PSR reach);
- Types of extra help need that priority services registers should cover;
- Internal categorisation or prioritisation of needs within the registers; and,
- Data checking and assurance standards (such as the existing performance commitments 'attempted contact' and 'actual contact').

We would consult on and then publish the priority services register standards after the publication of our final vulnerability guidance, so that the standards are in place by April 2025.

2.12.2 Respondents' view

The vast majority of respondents agreed with the proposal to set out separate PSR standards.

As noted in section 2.10.2 above, some respondents felt that the PSR standards would ideally be published before companies developed their vulnerability strategies.

Some respondents also said that the PSR standards needed to be in place as far in advance of the beginning of AMP8 as possible, to allow companies to develop their approaches to continuing PSR improvements.

Some respondents said that there was potential for confusion for customers and stakeholders by the standards and guidance being separate documents.

2.12.3 Our response

We are pleased that the proposal for developing separate PSR standards – to permit innovation while providing a degree of specificity – was broadly welcomed.

Our response to points around timing and choreography between vulnerability strategies and PSR standards is covered in section 2.10.3 above.

We agree that it is important to provide a degree of clarity and streamlining for customers and stakeholders around the relationship between different regulatory documents. While we believe that there is value in keeping the vulnerability guidance and PSR standards separate, we will ensure that this information is presented clearly on our website and avoids confusion.

3. Next steps

Based on responses received during our consultation, we have updated and finalised our vulnerability guidance. We are publishing our final vulnerability guidance alongside this decision document.

We expect companies to follow our final vulnerability guidance. When our new customer-focused licence condition comes into force next year, future enforcement action around companies' treatment of customers who need extra help will take account of how companies have considered our vulnerability guidance.

As companies develop their draft vulnerability strategies in the first half of 2024, we will work with CCW to engage with the sector and promote the development of high-quality strategies. Through this process, we will also share our early thinking around the future content of our PSR standards.

Appendix 2 includes a diagram illustrating the process and sequencing around the development of companies' vulnerability strategies and our PSR standards.

Appendix 1 – Changes to proposed guidance since our July 2023 consultation

Draft guidance – July 2023	Final guidance
<p>Objective 2 – Inclusive by design</p> <p>What this means: Water companies’ systems should be designed to meet the needs of their diverse customer base. Services should be designed in an inclusive way that does not harm customers who have undeclared extra help needs. Companies should collaborate with service users and subject matter experts in designing their services.</p>	<p>Objective 2 – Inclusive by design</p> <p>What this means: Water companies’ systems should be designed to meet the needs of their diverse customer base. Services and communications should be designed in an accessible and inclusive way that does not harm customers who have undeclared extra help needs. Companies should collaborate with service users and subject matter experts in designing their services.</p>
<p>Minimum expectation 1.1</p> <p>[...] These adaptations are likely to include:</p> <ul style="list-style-type: none"> • 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); • [...] • Siting new meters in places that are accessible to the customer. 	<p>Minimum expectation 1.1</p> <p>[...] These adaptations are likely to include:</p> <ul style="list-style-type: none"> • Offering a range of different communications channels and adaptations to suit different customer needs (for example, large print bills, alternative languages, Easy Read communications, telephone bill reading, etc); • [...] • Ensuring that customers are able to check their water consumption at reasonable intervals via accessible channels.
<p>Minimum expectation 1.2: Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.</p> <p>Customers have a right to know the likely level and nature of support they will receive from their company. This is especially important for customers who need extra help because it can allow them to plan accordingly for different situations, thereby further reducing their risk of harm.</p> <p>Conversely, if a customer does not understand the level and nature of support they are likely to receive, then any such planning will be based on incorrect assumptions. This could lead to reduced trust in their company or, most importantly, heightened risk of harm.</p> <p>Companies should consider how best to inform customers who need extra help about the adaptations they will receive. This could include direct communication with</p>	<p>Minimum expectation 1.2: Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.</p> <p>Customers have a right to know the likely level and nature of support they will receive from their company. This is especially important for customers who need extra help because it can allow them to plan accordingly for different situations, thereby further reducing their risk of harm.</p> <p>For example, this should include the circumstances where bottled water will be provided to priority services register customers during an incident. Providing customers with this kind of information can help customers to plan ahead of potential incidents, including working with family, friends or neighbours to put extra plans in place to give support.</p> <p>Conversely, if a customer does not understand the level and nature of support they are likely to receive, then any such planning may be based on incorrect</p>

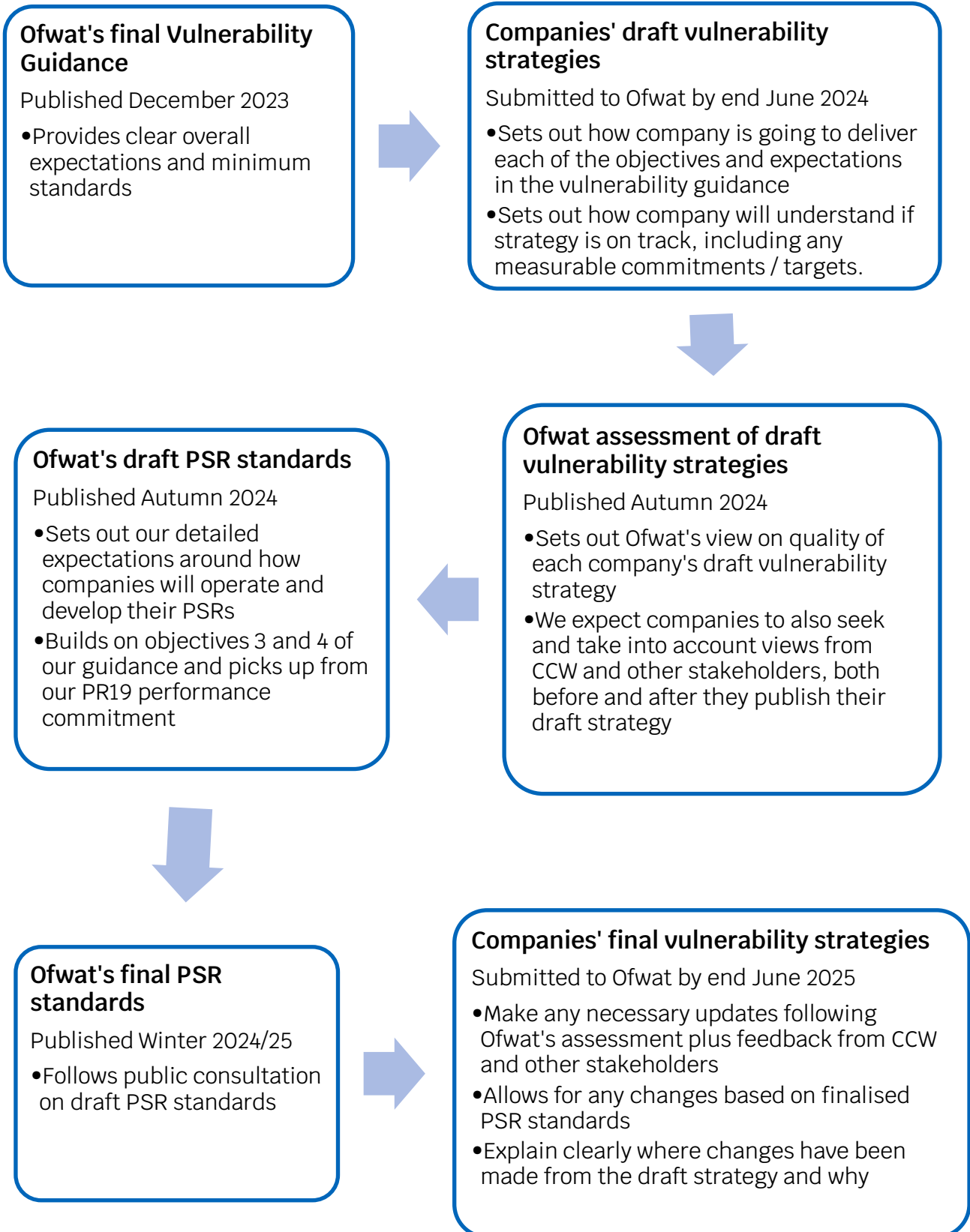
<p>the customer (for example, when a customer registers for priority services) or via engagement with key customer-facing third party organisations.</p>	<p>assumptions. This could lead to reduced trust in their company or, most importantly, heightened risk of harm.</p> <p>Companies should consider how best to inform customers who need extra help about the adaptations they will receive. In particular, this information should be actively provided to customers when they register for extra help services such as the priority services register. The information should be made available in accessible formats. This information should also be shared with customer-facing third party organisations, so they can advise customer appropriately.</p> <p>Companies should also make it easy for customers who are not satisfied with the provision of extra help they required– for example, during incidents – to contact their company and seek redress.</p>
<p>Minimum expectation 1.3: Companies should develop clear policies that set out any compensation arrangement for customers whose extra help needs have not been met.</p>	<p>[Expectation deleted; Expectations 1.4 and 1.5 renumbered to 1.3 and 1.4]</p>
<p>Minimum expectation 1.5: Companies should use a range of data to monitor the effectiveness of their extra help services, and the satisfaction levels of customers who have made such needs known.</p> <p>Extra help that companies provide to customers should be effective in reducing vulnerability in relation to the customer's interaction with its water company and potential harm. If companies are not able to monitor and assess the quality and effectiveness of their extra help services, they are likely to miss potential areas for improvement, which risks causing their customers' avoidable harm.</p> <p>Companies should use a range of data from both internal and external sources to track the effectiveness of the extra help they provide. This may include, but is not limited to:</p> <ul style="list-style-type: none"> • Survey data from customers who need extra help; • Direct qualitative engagement and shared experiences from customers who need extra help; • Operational and system data; • External assessments and reviews by third parties; and, • Internal challenge groups and customer panels. 	<p>Minimum expectation 1.4: Companies should use a range of data to monitor the effectiveness of their extra help services, and the satisfaction levels of customers who have made such needs known.</p> <p>Extra help that companies provide to customers should be effective in reducing vulnerability in relation to the customer's interaction with its water company and potential harm. If companies are not able to monitor and assess the quality and effectiveness of their extra help services, they are likely to miss potential areas for improvement, which risks causing their customers' avoidable harm.</p> <p>Companies should use a range of data from both internal and external sources to track the effectiveness of the extra help they provide. This may include, but is not limited to:</p> <ul style="list-style-type: none"> • Survey data from customers who need extra help; • Direct qualitative engagement and shared experiences from customers who need extra help; • Operational and system data; • External assessments and reviews by third parties; and, • Internal challenge groups and customer panels.

<p>As well as monitoring the effectiveness of specific extra help services, companies should also seek to monitor the overall satisfaction levels of customers who need extra help. This data should be benchmarked against the wider customer base to ensure customers who require extra help are no less satisfied than other customers.</p>	<p>As well as monitoring the effectiveness of specific extra help services, companies should also seek to monitor the overall satisfaction levels of customers who need extra help. This data should be benchmarked against the wider customer base to ensure customers who require extra help are no less satisfied than other customers.</p>
<p>Minimum expectation 2.1: Companies should communicate with customers in a way that is easy to understand to a diverse range of audiences. This should be underpinned by relevant insights, which may include research, engagement and accreditation.</p> <p>Water companies serve a diverse range of customers and communities across their regions. Clearly, different customers have different communication needs and preferences. This might be due to a specific impairment such as visual impairment, learning disabilities, hearing impairments, or co-ordination difficulties. Equally, many customers may have lower English or Welsh language skills.</p> <p>In all their communication with customers, companies should be mindful that there are likely to be many customers with undeclared communication needs and preferences. This means using plain English or Welsh in customer-facing communications, and considering what accessibility tools can be offered to make communications understandable to a range of customers. Where there is the option of accessing more tailored or bespoke support, this should be promoted prominently.</p> <p>Solutions should be tested with customers who are likely to need them and, benchmarked where appropriate against economy-wide standards, for example through accessibility accreditations.</p>	<p>Minimum expectation 2.1: Companies should interact with customers in a way that is inclusive for a diverse range of audiences. This should be underpinned by relevant insights, which may include research, engagement and accreditation.</p> <p>Water companies serve a diverse range of customers and communities across their regions. Clearly, different customers have different needs and preferences. This might be due to a specific impairment such as visual impairment, learning disabilities, hearing impairments, or co-ordination difficulties. Equally, many customers may have lower English or Welsh language skills, or low numeracy skills.</p> <p>In all their interaction with customers, companies should be mindful that there are likely to be many customers with undeclared needs and preferences. This means using plain English or Welsh in customer-facing communications, and considering what accessibility tools can be offered to make communications understandable to a range of customers. Where there is the option of accessing more tailored or bespoke support, this should be promoted prominently.</p> <p>Solutions should be tested with customers who are likely to need them and, benchmarked where appropriate against economy-wide standards, for example through accessibility accreditations.</p>
<p>Minimum expectation 2.2: Companies should offer their customers a range of ways to interact and communicate. This includes allowing customers to opt for third party billing where appropriate. [...]</p>	<p>Minimum expectation 2.2: Companies should offer their customers a range of ways to interact and communicate. This includes allowing customers to opt for third party billing where appropriate. [...]</p>

<p>This should also include allowing customers the option of third-party billing arrangements. This is likely to be particularly valuable for customers with reduced capacity, whether or not they have a formal power of attorney arrangement in place.</p>	<p>This should also include allowing customers the option of third-party billing arrangements, where a trusted individual is given the ability to manage the customer's account. This is likely to be particularly valuable for customers with reduced capacity, whether or not they have a formal power of attorney arrangement in place.</p>
<p>Minimum expectation 3.1: Companies should take active steps to identify customers who require extra help who have not yet been identified.</p> <p>Companies should strive towards having as comprehensive a picture as possible of the extra help requirements of individual customers in their area. This information will typically be recorded on each company's priority services register.</p> <p>There are a wide range of proactive steps that companies can take to identify customers who need extra help. This includes (but is not limited to): engagement with local charities and support organisations; working with local public sector service providers like councils and NHS; and direct engagement with customer groups.</p> <p>Companies should use these and other methods to grow their records of extra help needs over time.</p>	<p>Minimum expectation 3.1: Companies should take active steps to identify customers who require extra help who have not yet been identified.</p> <p>Companies should strive towards having as comprehensive a picture as possible of the extra help requirements of individual customers in their area. This information will typically be recorded on each company's priority services register.</p> <p>There are a wide range of proactive steps that companies can take to identify customers who need extra help. This includes (but is not limited to): engagement with local and national charities and support organisations; working with local public sector service providers like councils, social care providers and NHS; and direct engagement with customer groups.</p> <p>Companies should use these and other methods to grow their records of extra help needs over time.</p>
<p>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.</p> <p>When companies record sensitive data about their customers, they have important responsibilities, including holding that data securely, and explaining clearly to customers how that data will be used. When sharing data about customers' extra help needs, companies should take into account customer views about data use. This may include conducting research or using customer panels to gather views. The findings of any such activities should be used to inform companies' approaches to data sharing.</p>	<p>Minimum expectation 4.4: In designing their approach to recording and, where relevant, sharing customer vulnerability data, companies should clearly explain to customers how their data will be used, including any choices available to them. Companies should take steps to understand how their customers who need extra help feel about the use of their data.</p> <p>When companies record and share sensitive data about their customers, they have important responsibilities, including holding that data securely, and explaining clearly to customers how that data will be used and the choices available to them. These responsibilities apply irrespective of which legal basis is used for data sharing. Companies should carefully consider how best to design their processes so that these responsibilities are met.</p> <p>When developing approaches to data sharing, companies should take account of customer views about data use. This may include conducting research or using</p>

	customer panels to gather views. These insights can help companies understand how best to explain to customers how their data may be used.
<p>Minimum expectation 5.1: Companies should develop and maintain a vulnerability strategy setting out how they plan to support the extra help needs of their customer base.</p> <p>[...]</p> <p>Companies should publish their vulnerability strategies by the end of June 2024.</p>	<p>Minimum expectation 5.1: Companies should develop and maintain a vulnerability strategy setting out how they plan to support the extra help needs of their customer base.</p> <p>[...]</p> <p>Companies should publish their vulnerability strategies in draft form by the end of June 2024. Companies' final vulnerability strategies should be published by the end of June 2025, and should explain clearly where changes have been made from the draft strategy and why.</p>
<p>Minimum expectation 5.3: Companies should publish their service commitments for customers who have declared an extra help need so that all customers can understand the nature of help available.</p> <p>Companies should set out clearly the extra help that they offer their customers, and the level of support that customers who have asked for extra help can expect to receive. This information should be actively provided to customers when they register for extra help services such as the priority services register.</p> <p>For example, this should include the circumstances where bottled water will be provided to priority services register customers during an incident. Providing customers with this kind of information can help customers to plan ahead of potential incidents, including working with family, friends or neighbours to put extra plans in place to give support.</p>	<p>[Expectation deleted – content merged into expectation 1.2]</p>

Appendix 2 – Diagram: process for developing vulnerability strategies and PSR standards



**Ofwat (The Water Services Regulation Authority)
is a non-ministerial government department.
We regulate the water sector in England and Wales.**

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