

18 October 2023  
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Dear Ofwat,

**Service for all – a consultation on Ofwat’s draft vulnerability guidance for water companies supporting customers who need extra help**

Thank you for the opportunity to respond to this consultation.

Overall, we welcome Ofwat’s objective of giving companies clarity in this important area as you prepare to implement your new customer-focused licence condition and the minimum standards described within this document. We also agree that it is useful to establish both a clear direction of travel and what customers and other stakeholders can expect in relation to the extra help that water companies should provide.

In our draft PR24 plan we set out our commitment to fully adopt inclusive design principles and to make it easier for everyone to access the service that they need from their water provider. We have exceeded our performance commitment for the percentage of customers on our Priority Services Register in every year of the current AMP and over 80% of the customers on our support schemes agree they are helpful. It is a priority for us to further expand the reach of our schemes and to ensure that the services we deliver genuinely meet the needs of our customers. We are currently writing our full vulnerability strategy and will publish this next summer, following consultation and engagement with relevant stakeholders including our customers, local stakeholders and CCW.

As stated in our response to your Putting water customers first consultation in July 2023, we do ask that your approach to the monitoring and reporting requirements that will enable Ofwat to enforce this guidance as part of the wider customer-focused licence condition is both appropriate and proportionate, with consideration given to not unreasonably increasing administrative burden and costs to the companies.

I hope that this response is helpful. As always, I am happy to clarify or discuss any matters noted in this response further with you if you would like to discuss them further.

Best regards

A handwritten signature in black ink, appearing to read 'Kate Thornton'.

Kate Thornton  
Chief Customer Officer  
SES Water



SES Water is a trading name of Sutton and East Surrey Water Plc  
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**SES Water's response to consultation questions as listed on page two of your document:**

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

We agree with your proposal. We believe that the definition covers the main factors that determine where a customer may require more support and therefore, we believe this to still be a relevant and useful definition. We particularly like the term "*inclusive service*" as this aligns your second objective and will form an important part of our vulnerability strategy.

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

We agree with your proposal. As described in section 1.2.1 of your consultation document there is potential to "*alienate or create barriers to inclusion*" through the use of certain terminology. We therefore welcome your proposal to move the sectors thinking away from the use of the term "*vulnerable*" to "*Extra help*" which is easy to understand and more neutral language.

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

We agree with your proposal. Customers should be able to expect and receive the same level of service regardless of who supplies their water or where they live. We therefore believe that the guidance should be consistent and adopted across the water sector. This will ensure the industry as a whole is aligned and focused on improving outcomes of those customers needing extra help.

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

We believe the guidance has potential to improve the level of consistency of inclusive services for all customers requiring extra help and through that improve satisfaction levels and positive outcomes. The proposed minimum guidelines set a clear minimum standard whilst providing flexibility for those companies who wish to provide enhanced or innovative services to meet their customers needs. Water companies will be held to account through the publication of their strategies and through qualitative and quantitative performance measures.

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

One of Ofwat's three objectives in developing this guidance is to set clear expectations and empower the third sector to help shape future services. Customers' expectations are not shaped by their experience of any one service in isolation, and they are likely to be interacting with a range of other service providers including some such as financial service providers who they may have more frequent contact with. Their expectations are likely to be shaped by the totality of their experience. We do not have any specific examples of best practice in other sectors that we believe Ofwat should incorporate in its draft guidance, but we do think it would be sensible for Ofwat to consider existing and emerging guidance across all regulated sectors to understand where alignment is reasonable, as this would make it easier for customers, as well as where there may be genuine reasons for a different approach within the water sector.

This approach would also make it simpler for companies to implement the minimum standards where it is necessary or desirable to work across sectors. We have recently experienced the challenges that cross sector working can present when there is a misalignment of ways of

working and standards, as we have implemented our data-share agreement with UK Power Networks. Such arrangements make it easier for companies to meet their obligations and for customers who need extra help to receive it, so anything we can do to remove the barriers to making this happen is positive.

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

In general we agree, however we need to understand more of the detail around the monitoring and reporting requirements in this area. As we stated in our response to your Putting water customers first consultation in July this year, it is important that these are both appropriate and proportionate with consideration given to the resource implications, particularly for smaller water companies such as ourself.

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

We agree that the draft objectives as outlined in your consultation document broadly cover the areas of vulnerability and support the activities we should be considering.

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

Again, we agree with the proposed minimum standards in principle. We would however welcome further detail on the draft minimum expectations as summarised in section three of the document. For example, we would like to understand the proposals for measuring water companies against the outcomes outlined in section two.

**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 agree the minimum standards are clear in terms of what you expect from companies. However, in reference to “*challenging companies to innovate and find new ways to meet customer needs*”, whilst we believe the intent is there, we believe that further consideration could be given to a language that more clearly captures an expectation that companies will innovate and cross collaborate to go beyond these basic standards.

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

We agree with the proposed timelines for water companies publishing their vulnerability strategies by the end of June 2024. We note that our strategy is required to set out our approach to delivering extra help in the short, medium and long term. This will naturally mean that we will not be able to implement all aspects of our strategy in the short term, particularly where these are reliant on funding to be provided in the PR24 period. We would therefore appreciate Ofwat providing any more detailed information that they may have around implementation timelines once the strategy has been published.

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

We agree that the standards for priority service registers should remain separate at this stage whilst the Industry continues to review their approach.