

Subject: Paying Fair request for further information

Dear Ofwat customer policy team,

Thank you for your letter dated 6th April, requesting additional information regarding the compliance information we provided against your Paying fair guidelines.

I am sorry if the information provided previously was insufficient and did not meet your requirements.

Please find enclosed and attached the additional information requested.

1. Overall compliance

Please find enclosed the completed templated, setting out our overarching compliance with the guidelines.

As set out in our earlier response, we are pleased to say that we comply with 99% of the published guidelines and wholeheartedly support the spirit of the guidelines. We have included our current position within the template enclosed.

Our original response provides information on the work undertaken to improve our services to customers including areas identified where improvements can be made to enhance the support that we offer to our customers and stakeholders.

2. Work to comply

As noted in the enclosed template, we are 99% compliant against the guidelines. We have provided the specific timing of the remaining 1% of guidelines within the template.

3. Questions about your approach

Please find below additional information on the specific areas flagged:

Customer enquiries: 0333 000 1122
24 hour emergencies: 0333 00 00 365
Web: [southeastwater.co.uk](https://www.southeastwater.co.uk)

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3a. We understand you have implemented a new customer communication / relationship management platform, and that this is linked to a legacy system. How do you, using this platform or otherwise, deliver our expectations to **'Ensure information about customers is correct, up to date and is used' (Principle 1) and 'Identify and support customers in vulnerable circumstances' (Principle 2).**

Our new system is fully integrated with our Customer system. We validate and update customer data at each customer touch point. The same data is accessible to our customers through our My Account offering allowing customers to self-serve.

3b. How do you use customer feedback to design or influence your payment communications, policies and systems? **(Principle 1, Expectations: 'Make payment, help and debt services inclusive by design')**

We have multiple feedback opportunities. We survey customers after each interaction, agents provide feedback and opportunities to improve our process, we analyse all complaints and also supplement all this internal data with external insight. Each of these processes drives our internal continuous improvement programme.

3c. How do you explain bill increases or changes to bills to customers? **(Principle 6, Expectations: 'Make information about services and bill most understandable for all customers – and make it available in a way that best meets their needs')**

We included a leaflet with every bill to explain the increases and also provided information on our website

3d. How do you use credit reference agency data and apply best practice in using it? **(Principle 1, Expectations: 'Use best practice when using credit reference agencies')**

N/A We do not use credit reference agency data

3e. Explain how you use enforcement action as a last resort? **(Principle 5, Expectations: 'Use enforcement action as a last resort')**

Our in-house litigation team ensure all information is provided to customers at the right time and in-line with County Court rules. The enforcement action we take is on a case by case basis, based on the information we hold and the interactions with the customer. We always encourage contact with our customers and seek to agree affordable repayment of any outstanding debt.

3f. What are your audit processes in place for debt collection agents? **(Principle 7, Expectations: 'Use reputable debt collection companies that treat customers fairly and in line with agreed levels of service' AND 'Regularly and robustly check customers**

facing debt recovery action are treated sensitively' AND 'Allow customers to raise disputes involving the agent with the water company')

We tender our DCA process every 3 years, the required end to end process for all Debt Collection Agents aligns with our principles and approaches including identification of vulnerable customers. We audit each of the DCA's that we use who are also used by a number of other water companies.

3g. How do you make sure priority services customers get the support they need? Do your 'third party debt collection contracts' set out your expectations for how customers are treated, including the needs of PSR customers being met? (Principle 7, Expectation: Ensure the needs of priority service register customers are met)

Yes this is included in our tender process as 3F.

3h. You mention you are reviewing your code of practice following input from CCW. Have you implemented CCW's suggested changes? When will your update be completed and published?

Our code of practice review is happening again this year. We will be publishing updated versions by December 2023.

4. Publishing your compliance information

We do not see any reasons for our response to not be published.

In Summary

I hope the information provided above and in the attached template provide the necessary information

If you require any additional information or clarification, please feel free for your teams to contact us.

Yours sincerely

Tanya Sephton
Customer Services Director