

SSC response to vulnerability guidance consultation

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

We support Ofwat's observation that the definitions and terminology around vulnerability are less important than the action that companies take to support customers. However we also agree that that the language we use to describe customers has the potential to alienate or create barriers to inclusion.

We support the proposal to retain the current definition as set out in the 2016 Vulnerability Focus report. We are pleased that the definition includes a reference to customers who may be impacted by 'broader market and economic factors' particularly in light of the current cost of living crisis and the demographics of our region.

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

We believe that the sector has evolved in its use of terminology in this space, and support the move to reference 'extra help'. This will help encourage companies to focus on their actions and outputs, and is a more straight forward approach. Many energy companies use this terminology along with advice agencies such as Citizens Advice and support groups such as Scope. There should be synergies across various sectors to use the same consistent messages.

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

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 What impact do you think our draft guidance will have on the experiences of customers who need extra help?

We understand that improving outcomes for customers who need extra help in the water and wastewater sectors is a key priority for Ofwat. As part of the draft guidance includes challenging companies to share their Vulnerability Strategies, we believe this will have a positive impact in terms of driving outcomes. South Staffs & Cambridge Water have published its 'Help When You Need It Programme' as part of our PR24 plan, and includes affordability and vulnerability support. Examples include a new 'pay in your own way' approach aligned to CCW's Independent Review of Affordability, and extra help measures such as a bereavement line linked to loneliness charities and organisations. We also advocate for a 'wider than water' approach, and we hope that Ofwat will promote this as a holistic approach.

We believe that Ofwat's proposed approach to measure performance in this area will positively impact customer experiences by holding outcomes to account. Additionally, we plan to launch a new measure specifically for customers on our PSR register, to ensure we are continuously driving improvements in this space.

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

We support a 'tell us once' approach, linking in with energy companies to provide holistic support. We have also taken learnings from Cadent's Green Doctors scheme, and have incorporated 11,000 home visits into our AMP8 plan. Cadent provide Green Doctors to support their on the ground face to face support for customers in terms of energy advice and include water support signposting in their model. Energy appear more advanced in terms of support as early adopters, but the spread of their customers make it harder due to the competitive market, whereas with water we have set boundaries and regions which provide a better more targeted focus.

We also support the use of specialised products for customers who may be experiencing symptoms of dementia, e.g. valve devices to stop the flow if continuous use for over a certain period of time.

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

The licence condition is primarily and rightly focused on being beyond individual customer problems or complaints, which will continue under the well-functioning processes delivered by companies and CCW.

The example relating to non-delivery of bottled water service during a disruption has been flagged as an example of bad practice. It is unclear how this could be classified as a failure when the company appears to have met its legal obligations as well as its promise to the customer. There is a risk that customer service over and above requirements (such as in this example) may become the standard expectation rather than company choice.

If fines are imposed in this space we would also support a 're-dress scheme' whereby funds could be directed to further support customers who may need extra help.

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

We agree with the draft objectives and would also use our internal insight to further drive improvements.

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

We broadly support the proposed list, and will always strive to provide high standards of service and support. Many of the points referenced have been included in our AMP8 commitments e.g. a new policy to site meters in places of ease for customer read access. However we recognise that further investment may be required to fulfil certain examples in every instance. For example, delivering water to customers' homes during a supply incident may require additional support, particularly if this occurs out of hours.

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9. Do our draft minimum expectations offer a good balance between making clear the minimum standards we expect from companies, and challenging companies to innovate and find new ways to meet the needs of their customers?

We support the approach, and are committed to innovating to support our customers as best we can, whilst still operating within the guidelines / best practice set out by Ofwat.

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

As part of our PR24 submission we have included a number of investments which will support the requirements in this space. We will also ensure that changes are made before AMP8 e.g. introducing a 24/7 payment line to align with the 'pay in your own way' approach.

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 with the standards proposed and track a number of these already.