

AffinityWater

Our response to the consultation on Core Customer Information guidance

January 2024



Question 1: "Do you agree with our proposal not to prescribe how, where and when to communicate the Core Customer Information?"

We believe that companies are most suited to decide the optimal way and location for presenting essential customer information.

Question 2: Do you agree with our proposed changes as summarised in Table 1?

Current requirement within Condition G: Core Customer Information	Proposed new expectation	Our response
Requirement to make Core Customer Information available to their customers in written form.	In line with the new licence condition, principle to "provide easy to access contact information", and our draft vulnerability guidance: Service for All, we propose to extend this and make Core Customer Information available in a clear and accessible way. This includes giving customers details (within our bill format) details for how to access the Core Customer Information.	We support & agree with this change.
Companies must set out how customers can identify the company's genuine staff members. This can help customers avoid scams and other threats.	We propose to extend this to include how customers can identify staff who are communicating online, e.g. on social media. This is particularly important during incidents.	We support the proposed change however would request further guidance on online identity and the considerations to safeguard colleagues' privacy, aligning with our duty of care towards staff. This will ensure we meet our obligations with GDPR and the Data Protection Act 2018.
Details about the company's complaints handling procedure, including how customers can make a complaint.	We propose to extend this to include an expectation that companies set out the whole complaints process in the water sector, including the role of CCW and alternative dispute resolution (ADR).	We support and agree with this change. We already include this information in our complaint's guidelines information booklet.
The terms on which those services are provided, including the charges levied for the services.	We propose to remove this. Our Charges Scheme Rules requires that charges schemes set out the charges for services.	We support & agree with this change.
The payment methods available to customers in respect of those charges.	We propose to remove this. In 2021 we published our Paying Fair guidelines which set expectations on how companies should support customers in making payments. Our Charges Scheme Rules require that customers have a reasonable choice as to the times and methods of payment of the charges fixed by the scheme.	We support & agree with this change.

Question 3: Do you agree with the proposed scope for the Core Customer Information? In your view, is anything missing or should be excluded?

We agree with the proposed scope for the Core Customer Information. At Affinity Water, we are steadfast in our commitment to minimising customer friction and continually seeking ways in which we can enhance customer understanding of how best to engage with us. This aligns with our overarching goal of providing a seamless and customer-centric experience for all our customers.

A few further areas we feel could be considered 'in scope' include:

1) Data Privacy/Sharing Information:

We would also endorse the inclusion of data privacy and sharing information within the scope of the Core Customer Information. Safeguarding customer data is of paramount importance, and transparency in how their information is handled aligns with our commitment to privacy and regulatory compliance. We propose incorporating clear guidelines on data collection, usage, and sharing practices, ensuring customers are well-informed about the protection of their personal information in relation to being a customer of Affinity Water

2) Water Quality Information:

The provision of water quality information is essential for building customer trust and confidence. Including details about the quality of the water supply, testing processes, and adherence to regulatory standards will empower customers to make informed decisions about their water usage. This transparency contributes to the overall understanding of our commitment to delivering safe and reliable water services.

3) Water-Saving Information and Background:

We feel that water-saving information is a crucial component of the Core Customer Information. Incorporating practical tips, guidelines, and the rationale behind water conservation not only educates customers but also aligns with broader government targets for sustainable water use. By fostering awareness about the importance of water conservation, we contribute to collective efforts in meeting all environmental goals and ensuring the longevity of water resources.

4) Environmental Information:

Environmental considerations play a pivotal role in our operations, and we support the inclusion of environmental information in the Core Customer Information. This

could potentially encompass details about our sustainable practices, local conservation initiatives, and broader environmental impacts associated with our water services. Providing customers with insights into our environmental stewardship reinforces our commitment to responsible business practices and fosters a sense of shared responsibility for our local & national ecosystem.

Question 4: Do you agree with the proposed approach for companies reviewing their Core Customer Information?

At Affinity Water, we are committed to keeping our customers well-informed. We support the proposed approach for companies to review Core Customer Information regularly.

1) Timely Updates:

We agree that there should be prompt updates to the information to reflect any changes, ensuring customers always have the most accurate details.

2) Review Timeline Agreement:

We agree with the suggested review cycle, striking a balance between keeping information current and minimising disruptions for customers.

3) Continuous Improvement:

Beyond formal reviews, we agree with, and are dedicated to, the proposal for continuous improvement, seeking feedback, and the monitoring of industry best practices.

4) Communication of Changes:

We agree with the proposed approach for ensuring effective communication of significant changes to customers through various channels that is appropriate to individual needs, ensuring easy access to the latest information.

In summary, Affinity Water endorses the proposed approach, emphasizing our commitment to transparency, timely updates, continuous improvement, and effective communication with our customers.

Question 5: Do you agree on the proposed areas on which companies should consult CCW? Are there any other areas on which CCW should be consulted in relation to Core Customer Information and the customer focused licence condition?

Affinity Water acknowledges and agrees with the proposed areas on which companies should consult CCW regarding Core Customer Information and the customer-focused license condition. After careful consideration, we believe the identified areas adequately encompass the key aspects necessary for effective collaboration between water companies and CCW.

Upon review, we find that the proposed areas sufficiently address the pertinent considerations related to Core Customer Information and the customer-focused licence condition. Therefore, we do not identify any additional areas that require specific consultation with CCW at this time.

End.