

November 2023

Core Customer Information – Ofwat's draft guidance on core information companies should clearly provide to their customers

About this document

This document sets out our consultation on draft guidance for all water companies in communicating to customers key information which they need to know and understand.

We welcome responses to our consultation by **29 January 2024**.

Contents

1. Introduction	4
2. Our proposed Core Customer Information guidance	9
3. Using our guidance – what we expect from water companies	13
Appendix 1 – current Condition G	14
Appendix 2: Proposed new customer focused licence Condition G	17

Responding to this consultation

Our consultation questions

We welcome all responses to our consultation, and particularly answers to the following questions:

- Question 1: Should this guidance set an expectation for a single Code of Practice (or other form), or should companies determine how and where to display this information?
- Question 2: Do you agree with our proposed changes as summarised in Table 1?
- Question 3: Do you agree with the proposed scope for the Core Customer Information? In your view, is anything missing or should be excluded?
- Question 4: Do you agree with the proposed approach for companies reviewing their Core Customer Information?
- 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?

How to respond

Please email your response to customerfocus@ofwat.gov.uk.

The closing date for this consultation is 29 January 2024. If you wish to discuss any aspect of this consultation, please email customerfocus@ofwat.gov.uk.

We intend to publish responses to this consultation on our website at www.ofwat.gov.uk. Subject to the following, by providing a response to this consultation you are deemed to consent to its publication. If you think that any of the information in your response should not be disclosed (for example, because you consider it to be commercially sensitive), an automatic or generalised confidentiality disclaimer will not, of itself, be regarded as sufficient. You should identify specific information and explain in each case why it should not be disclosed and provide a redacted version of your response, which we will consider when deciding what information to publish. At a minimum, we would expect to publish the name of all organisations that provide a written response, even where there are legitimate reasons why the contents of those written responses remain confidential.

In relation to personal data, you have the right to object to our publication of the personal information that you disclose to us in submitting your response (for example, your name or contact details). If you do not want us to publish specific personal information that would enable you to be identified, our [privacy policy](#) explains the basis on which you can object to its processing and provides further information on how we process personal data.

Core Customer Information – Ofwat's draft guidance on core information companies should clearly provide to their customers

In addition to our ability to disclose information pursuant to the Water Industry Act 1991, information provided in response to this consultation, including personal data, may be published or disclosed in accordance with legislation on access to information – primarily the Freedom of Information Act 2000 (FoIA), the Environmental Information Regulations 2004 (EIR) and applicable data protection laws.

Please be aware that, under the FoIA and the EIR, there are statutory Codes of Practice which deal, among other things, with obligations of confidence. If we receive a request for disclosure of information which you have asked us not to disclose, we will take full account of your explanation, but we cannot give an assurance that we can maintain confidentiality in all circumstances.

1. Introduction

Purpose and scope of our Core Customer Information guidance

Providing customers with clear, accessible information is essential if water companies are to achieve our aim of a high standard of customer service and support. In our work with the water sector and stakeholders to develop a new customer- focused licence condition, this issue featured prominently. Customers being well informed is one of the three outcomes we want to achieve from the licence condition, and our proposed condition includes requirements for customers to receive the right information at the right time.

Core Customer Information is information which, as a minimum, customers should be made aware of and be able to access easily in order to understand the services they are entitled to, and their rights as customers. It also includes important information to protect customers during emergencies. We believe that it is important customers are appropriately informed of the Core Customer Information, to protect and empower them.

Currently, Condition G of company licences sets out Core Customer Information companies must provide to their customers. If we implement our proposal to replace the current Condition G with our new customer focused licence condition, as per our October 2023 [consultation](#) under sections section 12A and 13 of the Water Industry Act 1991, following this consultation and review of the current content of Condition G we intend to move the content of Condition G into guidance.

This document sets out our proposed new Core Customer Information guidance, including the information we expect companies to provide their customers both during normal business and times of disruption. Companies should take the guidance into account in relation to their compliance with the new customer focused licence condition

Guidance to support the customer-focused principles

Our proposed customer focused licence condition sets out legally binding principles for customer service and support. In our October 2023 consultation, we explained that we intend to provide supplementary guidance which companies should take into account when considering how to ensure their compliance with the licence principles. We are proposing that Ofwat will take into account how a company has considered our

guidance in its activities when considering companies' compliance with the new customer focused licence condition.

Supplementary guidance assists companies in taking an outcome-focused approach to compliance. However, whilst guidance sets our expectations of the way in which we consider companies can demonstrate compliance with the condition, we recognise that companies may also be able to demonstrate compliance in other ways. This can help to promote innovation while also keeping customers protected. At the same time, there may be areas where more specific guidance is appropriate to ensure customers are protected.

In the responses to our preliminary licence condition consultation in May 2023, the majority of respondents supported the proposal to move the current contents of Condition G: Core Customer Information into guidance. It was generally agreed that the contents of Condition G: Core Customer Information were mostly still relevant and of importance when establishing good customer service.

The proposed new customer focused licence condition and this proposed supporting guidance are intended to drive companies' behaviour in delivering our aspiration to see **high standards of customer service and support for the full diversity of customer needs across the water sector**. We consider publishing and communicating Core Customer Information to be imperative in meeting our desired outcome "Customers are well informed". The guidance should be considered across the full scope of our proposed new licence condition, although is most directly relevant to proposed principles G.2.1 – G.2.3, and G.3.1 – G.3.3 (set out below). The full proposed new customer focused licence condition can be found in Appendix 2.

- G.2.1 develop or have in place policies and approaches to meet the principles for customer care set out in paragraph G3, consulting with the Consumer Council for Water where appropriate;
- G.2.2 implement or continue to follow those policies and approaches in a way that meets the principles for customer care set out in paragraph G3; and
- G.2.3 explain in a manner that is effective, accessible and clear how it is meeting the principles set out in paragraph G3.

And:

- G.3.1 The Appointee is proactive in its communications so that its customers receive the right information at the right time, including during incidents.
- G.3.2 The Appointee makes it easy for its customers to contact it and provides easy to access contact information.
- G.3.3 The Appointee provides appropriate support for its customers when things go wrong and helps to put things right.

This guidance complements our existing customer policy guidance. These relate to financial and non-financial vulnerability, and our past work in relation to how companies handle customer complaints. It should be considered alongside these documents:

- Vulnerability guidance – [Service for all](#) (Ofwat, 2023)
- [Paying Fair Guidelines](#) (Ofwat, 2022)
- [Improving complaint processes in water – a follow up report](#) (Ofwat, 2021)
- [Putting things right: Household complaints practices in the England and Wales water industry](#) (Ofwat and CCW, 2020).

We will publish and maintain a guidance register which will list all relevant guidance, and supporting information which companies may find useful when considering the licence principles.

Reviewing and amending the content of Condition G: Core Customer Information

Currently, Condition G: Core Customer Information requires the Appointee to publish and make available specified information for customers. It also requires companies to have a complaints handling procedure and to provide specified information within its bills.

Whilst we recognise the majority of the requirements of Condition G: Core Customer Information remain relevant and important when delivering good customer service, we have made some changes to better align with the proposed new customer focused licence requirements. In Section 2 we set out our proposed Core Customer Information guidance which contains similar substantive requirements as the current provisions of Condition G: Core Customer Information, however expressed in a more simplistic and easily understood way. We believe this is important to provide clarity to companies, wider stakeholders and customers as to what we expect.

We have identified some areas of overlap between the requirements of current Condition G: Core Customer Information and other licence conditions, or guidance documents, or where requirements have been superseded by other regulatory mechanisms. For example, the current Condition G includes requirements relating to charges, billing and payment methods. These have been superseded by Ofwat's Charging Rules and our Paying Fair guidance. There are also requirements on how companies must report to Ofwat on compliance with the current Condition G. If we pursue our proposal to modify company licences as set out in our October 2023 consultation, this will be replaced in part by the reporting requirement included in the proposed condition, and also by the monitoring approach we take to it, which we intend

Core Customer Information – Ofwat's draft guidance on core information companies should clearly provide to their customers

to be proportionate and targeted informed by data and insight. We have avoided duplicating any areas of overlap in the proposed new guidance.

We have also identified some gaps, for example communicating the whole complaints process, which we have addressed in our proposed draft guidance in Section 2.

Table 1 below sets out the key changes we are proposing to make. In addition to these changes we are proposing to simplify the language and presentation of the expectations we deem still relevant in our proposed drafting (see Section 2).

Table 1: key changes we propose to make to Condition G: Core Customer Information when we move it into guidance.

Current requirement within Condition G: Core Customer Information	Proposed new expectation
Requirement to make Core Customer Information available to their customers in written form.	In line with our new licence condition principle to "provide easy to access contact information", and our draft vulnerability guidance: Service for All, we propose to extend this to expect companies to make Core Customer Information available in a clear and accessible way. This includes giving customers details on every bill they receive on how to access the Core Customer Information – retaining the role of bills within this guidance.
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 customer can identify staff who are communicating online, e.g. on social media. This is particularly important during incidents.
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).
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.
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.

This guidance applies to all water companies

This draft guidance applies to all water companies, by which we mean those holding an instrument of appointment for an appointed area as a water and/or sewerage

Core Customer Information – Ofwat's draft guidance on core information companies should clearly provide to their customers

undertaker in England and Wales. This includes new appointees, also known as NAVs, which are small water companies that typically supply new housing developments.

We are proposing that the licence condition should apply to household customers in England and Wales. In a more restricted form, we are proposing that it apply to companies' treatment of non-household customers (also called business customers) where they are not supplied by a retailer: in practice this means all but the largest non-household customers of Welsh companies, and non-household customers of some new appointees in both England and Wales.

We believe that the objectives and expectations we set out in this draft guidance are equally applicable to the treatment of all customers served by companies set out above.

How we will monitor company performance in this area

Currently, companies take a range of approaches to complying with the current Condition G. For example, some companies publish a central, single Core Customer Information document on their website, whilst others embed the requirements within their wider company policies and communications.

We propose not to prescribe how, where and when companies should communicate core information to customers. This should be informed by customer research and / or working with stakeholders, e.g. charities, to understand the different needs and expectations of customers, and how these change over time, for example during an incident. Core customer information may be within a single policy or document or may take the form of more than one clearly labelled policy and /or document, for example by subject matter.

We are planning to require companies to report annually to us to confirm that they are complying with the new customer focused licence condition. We propose that this includes stating how, where and when Core Customer Information is communicated. We will provide more information on such reporting in our decision document related to the new customer focused licence condition.

Consultation questions

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

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

2. Our proposed Core Customer Information guidance

What we mean by Core Customer Information

Core Customer Information is information, which as a minimum, customers should be made aware of and be able to access easily in order to understand the services they are entitled to, and their rights as customer. It also includes important information to protect customers during emergencies. We believe that it is important customers are appropriately informed of the Core Customer Information, to protect and empower them.

How to inform customers of Core Customer Information

Water companies should:

- Publish the Core Customer Information, presenting it in a manner which is effective, accessible and clear.
- Where any customer requests information which is part of the Core Customer Information, provide that information in an accessible form for the customer.

Our expectations on what the Core Customer Information should include

The Core Customer Information should include, but not necessarily be limited to:

- **How customers can contact their company.**
This should be communicated in clear and easy to find form, recognising different and changing circumstances of customers.
- **What customers should do in an emergency.**
This should recognise the different and potentially changing circumstances of customers, as set out in our vulnerability guidance, Service for All.
- **How customers can identify the company's genuine staff members.**
This can help customers avoid scams and other threats. This includes staff working in the community, attending customers' homes, and representing the company online e.g. on social media.
- **What services the company provides.**

All customers should be able to easily access information about all the services the company provides that are relevant to them, and understand what this means for them. In addition, it may be appropriate to tailor this via different communication methods recognising the different services customers receive e.g. where a customer only receives water or wastewater services from the company.

- **Details about the complaints handling procedure.**

Companies should establish, maintain and comply with a complaints handling procedure. Customers should be able to understand their company's complaints process in the wider context of the end to end complaints process in the water and wastewater sector. This will enable them to better understand their rights and options. Companies should also consider Ofwat's expectations in relation to complaints handling as set out in our [joint report](#) with CCW.

- **The company's leakage procedures**

This is in relation to leaks or potential leaks on supply pipes of domestic premises (in accordance with Condition H of the licence), including the charges that the company may levy when there is an unidentified leak on the supply pipe at a domestic premises with a water meter.

- **The role of CCW.**

Companies should inform customers of the role of CCW, and where and how they can contact CCW. This includes publishing in an easily accessible format a description of the role and function of CCW under the Water Industry Act 1991.

Reviewing the Core Customer Information

Companies should ensure that their Core Customer Information is kept accurate and up to date.

They should, at a minimum, review their Core Customer Information as a whole and, where necessary, revise it at least once every three years, or whenever requested to do so by Ofwat. These reviews should include both the content of the Core Customer Information and the way it is publicised.

Whilst we expect companies to conduct a thorough end to end review, at least once every three years, we would also expect them to continually improve the presentation of their Core Customer Information and to ensure they are complying with the proposed new licence condition. They should learn from their own experiences, and customer information/intelligence such as complaints data along with experiences/information from relevant stakeholders, including in the form of customer research. When making significant changes the Core Customer Information and/or the way in which it is

Core Customer Information – Ofwat's draft guidance on core information companies should clearly provide to their customers

presented, companies should consult CCW and take its views into account. We also to expect companies to consult with other relevant stakeholders as appropriate when making significant changes to any of the Core Customer Information.

When a change has been made to the Core Customer Information, companies should ensure customers are notified directly of the changes in a form appropriate to the varying individual needs.

Consulting with stakeholders

We believe that for substantial changes to the Core Customer Information, companies should identify key stakeholders to consult with to ensure wide and diverse views are considered.

CCW

We work closely with CCW to protect customers. CCW's role includes:

- handling customer complaints about companies;
- the provision of advice and conducting research; and
- engagement with water companies on their charges and social tariffs.

The proposed new customer licence condition requires companies to "develop or have in place policies and approaches to meet the principles for customer care set out in paragraph G3, consulting with the Consumer Council for Water where appropriate".

It is therefore important that companies actively consult with CCW in relation to matters relating to customer service. This should be in a broader context of engaging and communicating with CCW in an effective manner, including when requested by CCW.

Specifically, we expect companies to actively consult with CCW in relation to the following:

- Significant changes to Core Customer Information.
- Significant changes to the company's complaints procedure / code of practice and related communication to customers.
- Changes to information that describes CCW on bills and on the company website.
- Creation of and subsequent significant changes to customer facing information on what help customers should expect when incidents occur.

We set out in the below in **Table 2** our existing expectations on where companies should consult with CCW¹.

Table 2: Existing expectations on companies to consult with CCW which remain in addition to the above expectations.

Guidance	Reference	Expectation
Paying Fair	Pg 23	Review debt recovery strategies on a regular basis. Where these reviews result in changes to a company's debt recovery strategy, the company must consult with CCW on changes to their code of practice on debt recovery.
	Pg 26	Make sure that the code of practice on debt recovery is kept up to date, reflects operating practices and is available online or in hard copy – and reviewed at least once every three years. Companies should use customer insights and intelligence (see expectation 1.26-1.28) in making changes and make sure they are inclusive by design (see expectation 1.29). CCW must be consulted too
Service for All	Pg 17	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.
PSR	Pg 7	5.12 Each company should make sure that when literature or other information is reviewed and updated, the versions available to people with communication difficulties are also updated. The Consumer Council for Water (CCWater) should be given the opportunity to comment on any substantive changes.

Consultation questions

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

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

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?

¹ There are other requirements within the company licence which requires consultation with CCW.

3. Using our guidance – what we expect from water companies

Whilst guidance is not legally binding, our draft guidance sets out Core Customer Information that we expect all water companies to provide to their customers. We will take a company's consideration of our guidance into account when considering compliance with the proposed new licence condition.

It is however for Companies to decide how to comply with the new proposed licence condition and they may take different approaches to doing so. Where they do, we will consider any evidence that allows them to show why an alternative approach meets their obligations.

In these situations, companies should clearly demonstrate their reason for departing from the guidance – and be able to provide evidence when asked. We expect any other approaches companies take to be consistent with our objectives.

Our approach is focused on the outcomes that water companies are delivering for customers rather than the precise means by which those outcomes are achieved. It is imperative for all companies to own their approach to addressing the needs of their customers.

Water companies must comply with other legal and regulatory requirements which apply at the relevant time. This includes:

- the Water Industry Act 1991 and subordinate legislation;
- Companies' Instruments of Appointment;
- the Equality Act 2010;
- the Security and Emergency Measures Direction;
- Data Protection legislation, including the UK GDPR and the Data Protection Act 2018;
- the Well-being of Future Generations (Wales) Act 2015.

This is not a complete or exhaustive list and water companies will need to consider for themselves how they comply with all their legal and regulatory obligations. We would also expect companies to anticipate new requirements, and plan and deliver changes to their approach ahead of time.

Appendix 1 – current Condition G

Condition G: Core Customer Information

This condition requires the Appointee to publish and make available specified information for customers. It also requires the Appointee to have a complaints handling procedure and to provide specified information with its bills. Core Customer Information

G1 The Appointee must maintain information in written form for customers (the Core Customer Information) in accordance with this condition.

G2 The Core Customer Information must include, in relation to all customers, a description of:

G2.1 how customers can contact the Appointee, and what customers should do, in the event of an emergency;

G2.2 the means by which customers may identify officers authorised by the Appointee when those officers visit customers' premises;

G2.3 the arrangements which the Appointee has in place for the testing of meters and any charge which may be payable for such testing;

G2.4 the charges which the Appointee may levy where metered premises have been vacated; and

G2.5 the offences set out in section 175 of the Water Industry Act 1991 (offence of tampering with meter).

G3 The Core Customer Information must include, in relation to customers whose premises are not Eligible Premises, a description of:

G3.1 how those customers can contact the Appointee to make general enquiries;

G3.2 the role of the Consumer Council for Water and how those customers can contact it;

G3.3 the services provided to those customers by the Appointed Business;

G3.4 the terms on which those services are provided, including the charges levied for the services;

G3.5 the payment methods available to customers in respect of those charges, including payment by instalments and budget plans;

Core Customer Information – Ofwat's draft guidance on core information companies should clearly provide to their customers

G3.6 the Complaints Handling Procedure which applies for those customers; and

G3.7 any independent dispute resolution scheme which is in place for resolving disputes between the Appointee and those customers and how customers can access the scheme.

G4 The Core Customer Information must include guidance for customers whose premises are not Eligible Premises who are having difficulty paying their bills and a description of the procedures which the Appointee may apply to collect outstanding debt from those customers.

G5 The Core Customer Information must include, in relation to Domestic Customers, the procedures which the Appointee applies in relation to leakage (in accordance with Condition H) and the charges which the Appointee may levy where there is an unidentified leak on the Supply Pipe at metered Domestic Premises. Publication of the Core Customer Information

G6 The Appointee must:

G6.1 publish the Core Customer Information, presenting it in a manner which is effective, accessible and clear as a means of informing customers;

G6.2 publicise the Core Customer Information to its customers; and

G6.3 where any customer requests information which is part of the Core Customer Information, provide that information to the customer in writing.
Revising the Core Customer Information

G7 The Appointee must ensure that the Core Customer Information is accurate and up to date.

G8 The Appointee must review the Core Customer Information as a whole and, where necessary, revise it:

G8.1 at least once every three years; and

G8.2 whenever requested to do so by Ofwat, provided that such a request may not be made more than once in each year.

G9 In carrying out any review under paragraph G8, the Appointee must consider whether the content of the Core Customer Information remains appropriate and whether the manner in which the Core Customer Information is published is effective.

G10 Whenever it undertakes a review of the Core Customer Information under paragraph G8 or proposes to make any substantive revision to the Core Customer Information or the manner in which it is presented, the Appointee must consult the

Core Customer Information – Ofwat's draft guidance on core information companies should clearly provide to their customers

Consumer Council for Water and take its representations into account before (as the case may be) completing the review or making the revision.

G11 Where a revision is made to the Core Customer Information or the manner in which it is presented, the Appointee must inform the Consumer Council for Water of the revision which has been made and of how the revised Core Customer Information may be accessed.

G12 Where a revision is made to the Core Customer Information, the Appointee must publicise the revised Core Customer information to its customers. Anglian – Water & Sewerage Undertaker – Appointment Consolidated working version: Anglian Water: July 2023 103 Inclusion of information with bills

G13 The Appointee must:

G13.1 with every bill for Metered Charges, inform the customer of how the Core Customer Information set out at paragraphs G2.3 to G2.5 may be accessed;

G13.2 with every bill for charges payable by a customer whose premises are not Eligible Premises, inform the customer of how the Core Customer Information set out at paragraph G4 may be accessed; and

G13.3 with every bill for Metered Charges payable by a Domestic Customer, inform the customer of how the Core Customer Information set out at paragraph G5 may be accessed. Complaints Handling Procedure

G14 The Appointee must establish, maintain and comply with a Complaints Handling Procedure for handling complaints from customers.

Appendix 2: Proposed new customer focused licence Condition G

Proposed Condition G for companies operating wholly or mainly in England and have exited the retail market²

Introduction

This Condition requires the Appointee to adopt high standards of customer service and appropriate support for the full diversity of its customers' needs. It requires the Appointee to deliver the principles for customer care set out at paragraph G3.

Nothing in this Condition has the effect of removing or affecting the functions of the Consumer Council for Water in relation to the investigation of individual customer complaints.

Interpretation and application

- G1 In this condition:
- G1.1 an 'incident' means an event or situation which causes or may cause damage, disruption, distress or inconvenience to the Appointee's customers in their capacity as such which is not trivial.
 - G1.2 References to customers in principles G3.1 to G3.6 means the Appointee's customers in their capacity as occupants of Household Premises.

Principles for customer care

- G2 The Appointee must:
- G.2.1 develop or have in place policies and approaches to meet the principles for customer care set out in paragraph G3, consulting with the Consumer Council for Water where appropriate;
 - G.2.2 implement or continue to follow those policies and approaches in a way that meets the principles for customer care set out in paragraph G3; and
 - G.2.3 explain in a manner that is effective, accessible and clear how it is meeting the principles set out in paragraph G3.
- G3 The principles for customer care are:
- G3.1 The Appointee is proactive in its communications so that its customers receive the right information at the right time, including during incidents.
 - G3.2 The Appointee makes it easy for its customers to contact it and provides easy to access contact information.
 - G3.3 The Appointee provides appropriate support for its customers when things go wrong and helps to put things right.
 - G3.4 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.

² The companies whose licences we propose to modify with this text pursuant to s.12A WIA91 are Anglian Water Services Limited, Affinity Water Limited, Northumbrian Water Limited, Portsmouth Water Limited, Severn Trent Water Limited, South East Water Limited, Thames Water Limited, South Staffordshire Water plc, Southern Water Limited, South West Water Limited, Sutton and East Surrey Water plc, United Utilities Water Limited, Wessex Water Services Limited, Yorkshire Water Services Limited, ESP Water Ltd, Severn Trent Services (Water and Sewerage) Ltd and Veolia Water Projects Ltd.

Core Customer Information – Ofwat's draft guidance on core information companies should clearly provide to their customers

- G3.5 The Appointee understands the needs of its customers and provides appropriate support, including appropriate support for customers in vulnerable circumstances, and including during and following incidents.
- G3.6 As part of meeting principle G3.5 above, the Appointee provides support for its customers who are struggling to pay, and for customers in debt.

We propose that South West Water's licence contains the additional transitional provision

Eligible Premises on the Isles of Scilly

- G4 Unless Ofwat notifies the Appointee otherwise, and until 31 March 2025, paragraphs G1, G2 and G3 must be read as also applying to Customers of Eligible Premises on the Isles of Scilly.

Proposed Condition G for companies operating wholly or mainly in Wales or who have not exited the retail market³

Introduction

This Condition requires the Appointee to adopt high standards of customer service and appropriate support for the full diversity of its customers' needs. It requires the Appointee to deliver the principles for customer care set out at paragraph G3.

Nothing in this Condition has the effect of removing or affecting the functions of the Consumer Council for Water in relation to the investigation of individual customer complaints.

Interpretation and application

- G1 In this condition:
 - G1.1 an 'incident' means an event or situation which causes or may cause damage, disruption, distress or inconvenience to the Appointee's customers in their capacity as such which is not trivial.
 - G1.2 References to customers in principles G3.1 to G3.6 means the Appointee's customers in their capacity as occupants of Household Premises.
 - G1.3 References to customers in principles G3.1 to G3.5 means the Appointee's customers.

Principles for customer care

- G2 The Appointee must:
 - G.2.1 develop or have in place policies and approaches to meet the principles for customer care set out in paragraph G3, consulting with the Consumer Council for Water where appropriate;
 - G.2.2 implement or continue to follow those policies and approaches in a way that meets the principles for customer care set out in paragraph G3; and
 - G.2.3 explain in a manner that is effective, accessible and clear how it is meeting the principles set out in paragraph G3.
- G3 The principles for customer care are:

³ The companies whose licences we propose to modify with this text pursuant to s.13 WIA91 are Hafren Dyfrdwy, Dŵr Cymru and Albion Eco Ltd. The companies whose licences we propose to modify with this text pursuant to s.12A WIA91 are Albion Water Ltd, County Water Limited, Icosa Water Services Limited, Independent Water Networks Ltd and Leep Networks (Water) Ltd.

Core Customer Information – Ofwat's draft guidance on core information companies should clearly provide to their customers

- G3.1 The Appointee is proactive in its communications so that its customers receive the right information at the right time, including during incidents.
- G3.2 The Appointee makes it easy for its customers to contact it and provides easy to access contact information.
- G3.3 The Appointee provides appropriate support for its customers when things go wrong and helps to put things right.
- G3.4 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.
- G3.5 The Appointee understands the needs of its customers and provides appropriate support, including appropriate support for customers in vulnerable circumstances, and including during and following incidents.
- G3.6 As part of meeting principle G3.5 above, the Appointee provides support for its customers who are struggling to pay, and for customers in debt.

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