Core customer information guidance



About this document

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

If you have any questions about this guidance, please <u>contact us</u>. We also welcome direct feedback on how our guidance is working and where customers are experiencing both good or bad service from their water company and those representing water companies.

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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 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.

This document sets out our core customer information guidance, including the information we expect companies to provide to their customers both during normal business and times of disruption. Companies should take the guidance into account in relation to their compliance with Condition G: Principles for Customer Care.

Guidance to support Condition G

Condition G sets out legally binding principles for customer service and support. Ofwat will take into account how a company has considered our guidance in its activities when considering companies' compliance with this licence condition.

Supplementary guidance assists companies in their approach to compliance. However, whilst guidance sets our expectations of some of the ways 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.

This guidance forms part of our guidance register for the customer-focused licence condition (Condition G) <u>Guidance-Register-Version-1.0.pdf</u> (ofwat.gov.uk).

Other guidance in the register include:

- Vulnerability guidance <u>Service for all</u> (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).

This guidance applies to all water companies

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

We believe that the objectives and expectations we set out in this guidance are equally applicable to the treatment of all customers served by companies set out above. This also includes non-household customers in Wales and non-household customers in England who are not served by a retailer¹.

How we will monitor company performance in this area

We do not to prescribe here how, where and when companies should communicate core information to customers. This should be informed by companies' own customer research and / or working with stakeholders, e.g. charities, to understand the different needs and expectations of their customers, and how these change over time, or for example specific needs 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, but it must be easy for all customers to access.

We will monitor company performance in this area as part of our wider monitoring of Condition G – Principles of customer care. This includes targeted customer research and working with CCW.

¹ For non-household customers served by a retailer in England, the Business Customer Protection Code of Practice applies: https://www.ofwat.gov.uk/customer-protection-final-code-practice-non-household-retailers/

2. Core customer information guidance

What we mean by core customer information

Core customer information is information that, 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 minimum expectations on what the core customer information should include

This guidance should be considered alongside other guidance set out in our Guidance Register. Core customer information should include, but not necessarily be limited to the following.

- 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 and on behalf of the company, attending customers' homes, and representing the company online e.g. on social media.
- The services the company provides and associated service charges.

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, including service charges, consistent with Ofwat's charging rules. 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. Companies should also include support services available for vulnerable customers.

• The complaints handling procedure.

Companies should establish, maintain and comply with a complaints handling procedure, including the end to end complaints handling process in this sector. Customers should be able to understand their company's complaints process in the wider context of the 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 customer leaks or potential leaks, including compliance with Condition H of the licence. The company should set out its approach to supporting the customer to address the leak, including its approach to a leakage allowance and associated adjustment to charges.

• 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 transparency and accessibility of their core customer information, as appropriate, and to ensure they are complying with Condition G. 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 to the core customer information and/or the way in which it is 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 significant change has been made to the core customer information, companies should ensure affected customers are notified directly of the changes in a form appropriate to their varying individual needs.

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.

Companies should, among other things, actively consult with CCW in relation to matters relating to customer service and support. This should be in a broader context of engaging and communicating with CCW in an effective manner, including when requested by CCW.

In relation to core customer information, 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 and related communication to customers.
- Changes to information for customers that describes CCW.
- Creation of and subsequent significant changes to customer facing information on what help customers should expect when incidents occur.

To help companies, in **Table 1** we have listed where companies should consult with CCW as set out in other customer-focused Ofwat guidance ².

² There are other requirements within the company licence which requires consultation with CCW.

Table 1: Expectations in other guidance on where companies should consult with CCW.

Guidance	Reference	Expectation
Service for All	Pg 9	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.
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
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.

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

Whilst this guidance is not legally binding, it 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 Condition G.

It is however for Companies to decide how to comply with Condition G and they may take different approaches to doing so. When considering a company's compliance with Condition G we will consider any evidence that demonstrates why an alternative approach to that proposed in our guidance, meets their obligations.

In these situations, companies should be able to clearly explain their reason for departing from the guidance and how their approach is still compliant with Condition G.

Ofwat (The Water Services Regulation Authority) is a non-ministerial government department. We regulate the water sector in England and Wales.

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