

Ofwat – Core customer information guidance for water suppliers.

A response by Scope

January 2024

Introduction

Scope welcomes the opportunity to respond to this consultation on Ofwat's draft guidance on supplier core customer information.

It is encouraging that Ofwat recognise the importance of ensuring customers are well informed. However, it is Scope's view that this could be strengthened through the provision of more robust information on the water debt support available, and improvements to website accessibility.

The lack of standardised customer service across suppliers leaves some disabled customers without support, while others may receive an excellent service. As customers cannot choose their water supplier, access to support information should be consistent across all suppliers. Scope found that only 33% of disabled households were aware of the Water Sure scheme¹ and disabled households would benefit from increased awareness of the Priority Services Register (PSR) and improvements to two-way signposting with charities².

Context

Scope is becoming increasingly concerned around the proposal to increase water bills by 74%³. In our November 2023 Ofwat response, we shared that customers contacting Scope's Disability Energy Support (DES) service were in an average annual debt of £1,053. As of the end of December 2023, this figure has increased by 7%, to £1,122.

In January 2024, Citizens Advice shared that March 2023 saw a spike⁴ in the number of people needing help with water supply and sewerage debts.

¹ Scope (2022), Cost of Living – Policy report, <https://www.scope.org.uk/campaigns/research-policy/cost-of-living-report/>

² Scope (2022), Cost of Living – Policy report, <https://www.scope.org.uk/campaigns/research-policy/cost-of-living-report/>

³ Birmingham Mail (2023), UK households with a water bill face £800 rise in cost of living blow, <https://www.birminghammail.co.uk/news/midlands-news/uk-households-water-bill-face-28356445>

⁴ Citizens Advice Data Insights (2024) <https://public.flourish.studio/story/2139216/> Slide 14

After a decrease in April 2023, the numbers saw a gradual rise through to August, before a sharp rise in November 2023.

Alarming, between 2019 and 2023, Citizens Advice reported a 164% increase⁵ in the number of permanently sick and/or disabled people seeking crisis support.

Energy bill costs have been an ongoing concern for disabled people, and fears will only be heightened by the proposed increases around water bills.

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

Scope agrees with Ofwat's decision not to prescribe how, where and when suppliers should communicate core information to customers. However, it would be reasonable to expect suppliers to display the information in a clearly presented location on their websites, rather than requiring multiple clicks to access core information.

We urge Ofwat to encourage suppliers to be mindful of accessibility issues in both digital and non-digital communications. 78% of disabled people said that having access to digital technologies is helpful or very helpful⁶. However, disabled people are over 50% more likely than non-disabled people, to experience barriers accessing digital or online services. Accessibility is not the act of adapting or designing services for one impairment or condition⁷, it is adopting inclusive design to meet a variety of needs.

Scope highlighted the lack of accessible communications in our previous response. In 2023, our Utilities Team analysed the websites of 16 water suppliers, assessing the ease of finding the help sections available to disabled customers, such as the water social tariff, Watersure, and financial support. 44% of water suppliers were rated as 'ok' or 'poor' as more clicks were required, or it took considerable time to find support information.

⁵ Citizens Advice Data Insights (2024) <https://public.flourish.studio/story/2139216/> Slide 22

⁶ Scope (2021) Accessibility and disability: UK research and statistics, <https://business.scope.org.uk/article/accessibility-and-disability-facts-and-figures>

⁷ Scope (2021) Accessibility and disability: UK research and statistics, <https://business.scope.org.uk/article/accessibility-and-disability-facts-and-figures>

Additionally, only 12% of water suppliers provided an accessible copy of support forms that allowed customers to edit the document and attach their medical evidence. This is just one example of the many barriers that prevent disabled people accessing support and benefitting from the £900 million gap⁸ in unclaimed support.

Disabled people experience a range of digital barriers when engaging with organisations, which is why it is important for websites to be accessible⁹, inclusive¹⁰, and consistent.

Having important and often essential information at the end of long user journeys can create barriers for a range of people, including:

- People who must navigate the website by using the tab key.
- People with cognitive impairments who become overwhelmed by lots of information, struggle to process or find the information they are looking for.
- People living with chronic conditions who may need more breaks, experience brain fog, or struggle processing information.

Scope's recommendations on best practice:

- For essential services, suppliers should aim to meet the Web Content Accessibility Guidelines (WCAG) criteria (AA or AAA)¹¹. This includes the removal of jargon and ensuring the language used is easy to understand¹².
- Suppliers must provide consistent help, for example having a chat bot button in the same location, and the contact detail section in the same place. This enables disabled consumers to know what to expect and creates better cross-supplier information to customers.
- Essential information that relates to disabled people (including contact information) should have user research and testing behind its

⁸ Policy in Practice (2023), Water bills to jump by 40% yet £900 million of water social tariffs unclaimed, <https://policyinpractice.co.uk/water-bills-to-jump-by-40-yet-900-million-of-water-social-tariffs-unclaimed/>

⁹ Scope (2023), A beginners guide to digital accessibility, <https://business.scope.org.uk/article/a-beginners-guide-to-digital-accessibility>

¹⁰ Microsoft, Microsoft Inclusive Design, <https://inclusive.microsoft.design/>

¹¹ Gov.uk, Making your service accessible: an introduction, <https://www.gov.uk/service-manual/helping-people-to-use-your-service/making-your-service-accessible-an-introduction>

¹² Content Design London, Readability Guidelines, <https://readabilityguidelines.co.uk/>

development¹³. Disabled people and/or organisations representing the interests of disabled people should be consulted to ensure any essential information is co-produced and works for customers with a range of impairments.

- Information such as contact options, PSR, or emergency support should be easy to find. Ideally, we'd like to see this displayed consistently across suppliers.

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

Yes. It would be useful for complaint process information to be clearly displayed on websites and included in all forms of correspondence.

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

Yes.

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

Yes. Where customers are struggling to locate specific information or requesting more, it may be reasonable for suppliers to review accessibility requirements, at more frequent intervals, than once every three years. Ideally, Ofwat should have a robust monitoring method to identify where suppliers are consistently falling behind on accessibility.

This could be supported through tracking customer query topics, given the proposed increase in water costs¹⁴, changes to the infrastructure and the continued increase of cost of living and energy.

¹³ Content Design London, What is content design? <https://contentdesign.london/blog/what-is-content-design>

¹⁴ Policy in Practice (2023), Water bills to jump by 40% yet £900 million of water social tariffs unclaimed, <https://policyinpractice.co.uk/water-bills-to-jump-by-40-yet-900-million-of-water-social-tariffs-unclaimed/>

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?

Yes.