

Core Customer Information – Ofwat’s draft guidance on core information companies should clearly provide their customers.

Severn Trent response

29 January 2024

Executive Summary

Severn Trent response to Ofwat’s Consultation paper on core customer information companies should clearly provide to their customers.

We continue to support the introduction of the customer focused licence condition and agree that the information set out within the Core Customer Information guidance is the minimum customers should be made aware of and be able to access easily in different formats.

We agree with the decision to remove the current requirements relating to the charges levied for the services, and the payment methods that are available to customers in respect of those charges, as there is overlap between these requirements and other regulatory mechanisms. At Severn Trent we fully embraced Ofwat’s Paying Fair guidelines and Ofwat judged us to be “exemplary” in July 2023 in how we responded to the 143 requirements. We support Ofwat’s vulnerability guidance ‘*Service for All*’, which aligns with our current customer plans and provides the flexibility for us to continue to improve the service we provide to customers who need extra help.

In the remainder of this response, we address the specific questions raised in your consultation document.

Our response to the consultation questions

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?

We believe companies should determine how and where this information is displayed. In 2021, during our last Code of Practice update, we moved away from having a single Code of Practice. We learnt from feedback from our customers that finding the information they specifically needed was difficult in the single Code of Practice. We therefore split our Code of Practice into six separate documents, and these are displayed in our policy library on our [website](#). The 6 documents are listed below:

- Help when you need it.
- Water supply.
- Wastewater services.
- Billing, metering, and supporting you.
- Laying in private pipework.
- Guaranteed service standards.

Whilst our Codes of Practice cover these six categories, these are not limited, and through continuous improvement we can and will create specific ‘codes of practice’ where necessary.

2. Do you agree with the proposed changes as summarized in Table 1?

We agree with the proposed changes summarized in Table 1, we are pleased we are already aligned with many of these changes, particularly the *Paying Fair Guidelines* & the *Service for All* vulnerability guidance.

We are currently undertaking a bill redesign, and the Core Customer Information will continue to be made available in a clear and accessible way, including how customers can (i) access the Core Customer Information hub which will be clearly displayed on our website, and (ii) can request this via other formats such as via a letter if needed.

Within our Core Customer Information, we signpost customers to where they can find information on how they can identify genuine staff members, particularly around bogus callers and door knockers and we have a ‘doorstep password scheme’ to protect our customers. We are extending this information to include our Social

Media policy on how to identify genuine staff members on our social media pages. We recognize this is particularly important during incidents.

Our bills clearly display our complaint-handling procedure and how customers can make a complaint. The wording we use was agreed and signed off by CCW through the recent changes to the Alternative Dispute Resolution (ADR) process, and we include information about the roles of CCW and DRO (Dispute Resolution Ombudsman).

We agree with the removal of the requirement for information on the charges levied for services as this is clearly displayed within our Scheme of Charges.

We agree with the removal of the requirement for information on the payment methods that are available to customers in respect of their charges. As part of the Paying Fair Guidelines this is clearly outlined in both our Scheme of Charges and our 'Billing, Metering and Supporting You' code of practice.

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, we feel the seven bullet points fully represent the core information a customer could ever need. We are pleased that we are aligned with many of these expectations already.

We are currently in the process of updating our website and policy library to ensure all this information is accessible and visible in one place - known as the 'Core Customer Information Hub'. This hub will include all our Codes of Practices', and other useful information such as policies and leaflets to ensure we are meeting all required expectations.

We do not consider anything is missing at this moment in time.

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

We agree with the proposed approach to reviewing the Core Customer Information. Our Codes of Practices are reviewed on a three year cycle to ensure the information is still reliable and accurate.

We also continually review on a more frequent basis to ensure the information displayed is in a format that is easy and accessible for all our customers. We regularly consult with other customer groups to gather feedback and research on our information, this includes consulting with CCW, and this helps make informed decisions and changes where applicable.

5. Do you agree on 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?

We agree with the proposed areas on which companies should consult with CCW, and we are pleased that we have already been consulting with CCW throughout the years. We have found that consulting with CCW and gathering their thoughts and feedback has helped develop integral customer communication campaigns.