



Consultation - Core Customer Information Guidance

Southern Water response

23rd January 2024

Southern Water welcomes the opportunity to comment on the proposed guidance for the provision of Core Customer Information and we are supportive of Ofwat's aims to ensure that customers can easily access key information relating to their water company and the services it provides.

The replacement of current licence condition G with the new customer focused licence condition and the consequential removal of the specific requirements relating to information provision means that it is important for Ofwat to be clear in their requirements for the provision of information to customers. The proposed guidance is a helpful step in this direction and we support much of the content. We would, however, welcome clarity on the timeframe within which companies are expected to be compliant with this guidance, noting that the new Licence Condition G comes into effect on 12th February yet the consultation on this guidance only closes on 29th January.

Our detailed response is below.

Should you have any questions please contact:

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

Yes. We support the proposed flexibility, as this will allow water companies to customise communication strategies to cater to their unique customer demographics and regional characteristics.

The absence of a rigid framework opens opportunities for innovation in communication methods and for cost-effectiveness, enabling us to utilise the most efficient channels and methods for each situation, rather than a one-size-fits-all approach.

With the freedom to explore various channels, we can experiment with new and effective ways of reaching out to our customers, whether it be through digital platforms, community events, or traditional media. This is particularly important in keeping pace with the evolution of technology, which significantly influences how people prefer to receive information.

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

Yes. We see the changes as positive and supporting a customer-focused approach. The general focus on accessibility, rather than requiring a specific format, gives the freedom to tailor key information to our customers' needs. We also support the updating of

The objective of enhancing accessibility and clarity by making information more accessible and understandable is positive. It improves customer awareness and empowerment and is beneficial for both the service provider and the customer.

In this increasingly online age, providing information to customers about how they identify genuine staff members communicating with them through online media is a sensible step to help protect our customers from fraudsters. We can also understand the reasoning behind the requirement to explain the full complaints process to our customers, given the recent changes to CCW's role.

We very much support the removal of overlaps with other required publications as we have raised our concerns about increasing regulatory requirements relating to reporting and publications on several occasions.

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 believe that the proposed scope for Core Customer Information well-considered, aimed at empowering customers by ensuring they are thoroughly informed about their rights, services available to them, and actions to take in emergencies.

One of the most significant positives of this approach is its focus on accessibility and clarity. This is crucial in ensuring that all customers, regardless of their individual circumstances, can easily access and understand the information provided.

Whilst we do not feel there is anything missing or that any of the suggestions made should be excluded, we do feel that the Core customer information needs to be presented in a way in which customers understand. Removing unnecessary technical jargon and providing summarised overviews of what can be expected will

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be more beneficial and user friendly than publishing every intricate detail of our customers rights and entitlements. We would suggest simplified versions are publicised with links to the full information being provided, allowing our customers to review their rights in full or a summarised version, this is particularly beneficial for vulnerable customers or those not as tech-savvy.

The publishing of Core customer information will undoubtedly enhance customer understanding and confidence in their service providers and clearly demonstrates a commitment to transparency and building trust.

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

We are supportive of the requirement for a thorough review at least once every three years as this emphasises the importance of maintaining accurate and up-to-date information, which is crucial for effective customer service and regulatory compliance.

We are, however, concerned about the proposed requirement for companies to improve continually the presentation of their Core Customer Information as this could be overly burdensome in cost and resource terms. Similarly we feel the requirement to notify customers directly of any significant changes could have a material cost impact and could also lead to customer confusion. WE would need further clarification from Ofwat on their expectations in this area before we could be supportive.

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?

We agree with the proposal for water companies to consult CCW on the areas specified, this is something we already do given the important role CCW play in protecting customers and the insight they can provide.