



Ofwat's draft Core
Customer Information
Guidance – Thames Water's
response to Ofwat's
consultation

31 January 2024

Thames Water welcomes the opportunity to respond to Ofwat’s draft guidance on Core Customer Information and the expectations on provision of clear, accessible information to customers. We recognise that it is the intention of Ofwat to move the current Condition G, which sets out information that companies must provide to customers, into guidance if the proposal to replace the current Condition G with a new customer focused licence condition is implemented in February 2024. We welcome the introduction of a guidance register which will be useful when considering the new licence principles.

No part of this response is confidential, and we are content for it to be published in full.

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

We believe that companies are best placed to determine how and where to display the Core Customer Information within Condition G. We agree with the proposal not to prescribe how, where and when to communicate Core Customer Information.

We acknowledge that we may be required to report to Ofwat annually to confirm compliance with the new customer licence condition stating how, where and when Core Customer Information is communicated and would welcome more information on this reporting requirement in your decision document. We would propose that any such reporting is done as part of the Annual Performance Reporting process.

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

In principle we agree with the proposed changes to Condition G as summarised in table 1 of the consultation document. We have responded specifically to each of the proposed changes below.

Table 1 Thames Water’s response to Ofwat’s proposed new expectations on Core Customer Information.

Current requirement within condition G: Core Customer Information	Ofwat- Proposed new Expectation	Thames Water - Response
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	We agree with the proposal to extend the guidance to expect companies to make Core Customer Information available to customers in a clear and accessible way including giving customers details on every bill they receive. We already include details on how to

Current requirement within condition G: Core Customer Information	Ofwat- Proposed new Expectation	Thames Water - Response
	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.	<p>access Core Customer Information on our bills such as:</p> <ul style="list-style-type: none"> - How to contact us - How to access the complaints process - The role of CCW in the complaints process - Our charges
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.	<p>We support the proposal to extend the current requirement to set out how customers can identify companies genuine employees to include employees who are communicating online via social media.</p> <p>We will be expanding our existing “Confidence in our communication” page to include links to our genuine social media accounts and advice for our customers on how to spot fraudulent accounts on social media. We note that although all due care can be taken to advise our customers on how to ensure they are genuinely speaking with us on social media we are unable to remove fraudulent accounts from social media. We can and do report these accounts to the social media platform.</p>
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).	We agree with the proposal to include an expectation that companies set out the whole complaints process in the water sector, including clarifying the role of CCW and the alternative dispute resolution process.

Current requirement within condition G: Core Customer Information	Ofwat- Proposed new Expectation	Thames Water - Response
		We recommend consistent wording regarding the role of CCW, and the ADR process, is used for all water companies so that all customers are given the same information on this topic.
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.	We support the proposal to remove the requirement to include the terms on which services are provided, including the charges levied for the services and agree that this is now covered by the Charges Scheme Rules.
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.	We support this proposal and agree that the Paying Fair guidelines and Charges Scheme rules capture all relevant information in relation to Payment methods.

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 agree with the scope of the Core Customer Information and do not feel anything is missing or should be excluded. We respond to each of the expectations for Core Customer Information in more detail below:

How customers can contact their company.

We agree that Core Customer Information should include details on how to contact the company and that this information should be communicated in a clear and easy to find form, recognising different and changing circumstances of customers. We currently provide this information on our website and on customers' bills.

What customers should do in an emergency.

It's important that our customers know what to do in an emergency and we agree that this information should be part of the Core Customer Information and that we should recognise the different and potentially changing circumstances of customers. We currently provide this information on our website and also provide specific information for those who require extra help.

How customers can identify the company's genuine staff members.

Information on how customers can identify genuine company employees should be included as part of Core Customer Information. We support the scope including employees working in the community, those attending customers' homes, and those representing the company online e.g., on social media. We provide information on how customers can identify genuine Thames water colleagues and communicate this on our website. We will be extending this to include social media as per our response to Question 2 of this consultation.

What services the company provides

We agree that information on what services the company provides should be included as part of Core Customer Information and that where appropriate, this should be tailored to recognise the different services customers receive e.g., where a customer only received water or waste water services from the company. We explain our water and wastewater services in detail to customers on our website and we also highlight the specific services we provide to a customer within their bill. We describe the extra support services available for both affordability and inclusive service support. We explain the service provided to wastewater only customers and signpost the Water UK service provider look up service.

Details about the complaints handling procedure.

It's important for our customers that details about the companies' complaints handling procedure is part of the Core Customer Information. We agree that companies should establish, maintain and comply with their complaints handling procedure and display it in a way that makes it easy for customers to understand.

The company's leakage procedures

We agree that details about the company's leakage procedures in relation to leaks or potential leaks on supply pipes of domestic premises 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 should be included as part of Core Customer Information. Our leakage procedures are available on our website.

The role of CCW.

Information about the role of CCW and how customers can contact them should be included as part of Core Customer Information. As previously stated in our response to question 2 of this consultation, we recommend consistent wording regarding the role of the CCW is used for all water companies so that all customers are given the same information on this topic.

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

We agree that, as a minimum, companies should review both the content of the Core Customer Information and the way it is publicised every three years or whenever requested to do so by Ofwat. We also agree that companies should be seeking to continually improve the presentation of their Core Customer Information as part of demonstrating they are complying with the proposed new licence condition making use of their own experiences and customer information/intelligence.

We support the notion that, for substantial changes to the Core Customer Information, companies should identify key stakeholders to consult with alongside the CCW so that wide and diverse views are considered.

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 that companies should 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.

Additionally, there are existing expectations to consult with CCW on e.g. on other guidance for 'Paying Fair' and 'Service for All' which remain.

We have not identified any other areas in which the CCW should be consulted in relation to Core Customer Information and the customer focused licence condition.



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