

UUW welcomes the opportunity to comment and respond to Ofwat’s draft guidance on the Core Customer Information that companies should provide to their customers.

Over a number of years United Utilities has demonstrated a continual commitment to improving customer service, ensuring that customers are well informed and can have confidence that we will put things right when they go wrong. We recognise the importance of providing customers with clear, accessible information. Clear information helps drive standards of customer service and is crucial to supporting the full diversity of customers’ needs, playing a key part in ensuring help reaches where it is needed most. Given the high importance customers place on communication they receive it is right that the industry works hard to communicate both during periods of normal business activity and during times of disruption to customers.

We are supportive of both the objectives and general wording of the proposed guidance. To aid clarity and consistency between customer facing guidance documents we recommend that this guidance explicitly include a need to communicate to customers how they can register for the priority service schemes and how to access support when they are struggling to pay. These requirements are already set out in the ‘Service for All Vulnerability Guidance’ and the ‘Pay Fair’ guidance documents. We believe it would help consistency to restate these requirements in this guidance document.

Please find below our response to the questions set out in the draft guidance consultation.

We would of course be happy to discuss further any of the comments raised in this response.

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

We agree the Core Customer Information should be easily accessible and do not believe that prescribing how, where and when to communicate would recognise the diverse needs of customers. We recognise the merits to the guidance and principles that have been set out. We are clear on the outcomes that we need to achieve and feel that we need to be creative in how the Core Customer Information is provided. The proposed guidance allows companies to have the adaptability and flexibility to ensure the Core Customer Information is communicated effectively and proportionately, whilst being clear of the required outcomes for customers that companies must achieve.

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

We support the changes and the approach that is set out in Table 1.

UUW already acts in line with the majority of proposed requirements and is actively adapting in the small number of instances where action is needed. For example we are currently setting out the changes we can make to support the potential requirement to explain how customers can identify staff who are communicating on social media. Currently our Social Media accounts are set up as corporate accounts and replies are from the company rather than individuals. To address potential new requirements we would look to make an enhancement to our dedicated web page around bogus callers to include electronic communications.

**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 consider the proposed Core Customer Information guidance set out some clear expectations for companies.

In addition to the scope already included we suggest [two] further clarifications:

1. We would be supportive of the explicit mention for customers on how to register for the priority service scheme. We believe it is vital to set out clearly the support that customers can get from the extra support that is available through registering for Priority Services. This will allow the customer to ensure they can access the support available to them. We recognise this is set out in the Service for All Vulnerability guidance but felt it would also be helpful to include in Core Customer Information guidance.
2. We would also be supportive of the explicit mention on displaying information to customers to help and support them when they are struggling to pay. We recognise that during difficult times it is important that customers know the contact information and the schemes available. It is essential that customers have easy access to this information and they know how to access this support. Again we recognise this is set out in the Pay Fair guidance but felt it would also helpful to include in Core Customer Information guidance.

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

We are fully supportive of the approach to review core customer information and agree that providing assurance through the existing company Regulatory Reporting Framework is the most proportionate approach.

**Question 5: Do you agree on the proposed areas on which companies should consult CCW? Are there any other areas which CCW should be consulted in relation to Core Customer Information?**

We agree with proposed areas for consultation with CCW. We have in any case frequently consulted with CCW on material changes in the areas covered by the guidance.

We recognise the value of the input from consultation. In practice we will make numerous and frequent changes to policies, processes and procedures to align to changing operational activities and workflows. The wording in current guidance sets out the need for consultation on significant changes and we would reiterate the importance of consultation only being mandatory for significant changes; as we have previously represented, prescribing consultation for all changes could materially and unnecessarily delay improvements, reduce responsiveness and restrict the flexibility that companies need in order to manage the operations with maximum customer focus. We would be concerned that a requirement to consult on all changes would detrimentally impact on meeting customers' expectations of their service provider.