

19 January 2024

**Consultation response: Guidance on Core Customer Information**

Thank you for the opportunity to comment on this consultation.

We have provided a detailed response to each question in the Appendix.

We hope you find it helpful and if you have any queries, please do let us know.

Best wishes

Sue Lindsay

Director of Customer Policy & Engagement

## Appendix 1

### 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? (Question on page 2)

#### Do you agree with our proposal not to prescribe how, where, and when to communicate the Core Customer Information? (Question on page 8)

Yes, we agree that companies themselves should make informed decisions about how, where, and when to communicate their Core Customer Information.

Customers should be able to easily access and understand the part of our Core Customer Information that is relevant to them at the time. Typically, we have found that individual clearly labelled policy documents or web pages are easier to navigate and understand than a lengthy single Code of Practice.

For example, our Core Customer Information is found on its own webpage [Core customer information | Wessex Water](#) which then links to the relevant information or a section elsewhere on the site. Customers can request information in a different format if they wish. If a customer contacts us, for example by phone, we can determine what information they need and send this out to them or direct them to the relevant page on our website.

### 2. Do you agree with our proposed changes as summarised in Table 1?

Yes. In many cases, we already meet the proposed new expectation. For example, we provide customers with information about the whole complaints process.

It would be helpful if Ofwat could clarify in the final guidance the expectation around identifying staff who are communicating online. It is impossible to prevent fake accounts being set up so we assume this is asking companies to educate their customers about our official social media accounts and how to recognise them, how we will use them and what customers won't be expected to do or information they wouldn't be asked to provide. This sort of information is shared by other organisations such as banks to help their customers spot scams.

We agree that the Charges Scheme Rules clearly require companies to set out the charges for services, so that area of the current Condition G can be removed when transferring it into guidance. Charges schemes are by nature quite legal documents, so we think it is still very important for companies to provide customers with information on charges in an effective, accessible, clear, and simple format. We will continue to produce simple charges explained information as part of our Core Customer Information.

G2.3 to G2.5 of the current Condition G makes specific reference to arrangements for testing of meters and the related charge, charges for vacant metered premises and offences for tampering with a water meter. These are not referenced in Table 1 and don't specifically feature in the proposed wording in Section 2 so it would be helpful for Ofwat to confirm that they have been removed because they either feature in the charges scheme or are covered by requirements under the metering regulations.

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

Yes, we generally agree with the proposed scope.

There is information that we currently include within our Core Customer Information e.g., Priority Services and the Wessex Water Promise (GSS) and we assume they would fall under the broad category of “what services the company provides”. It may be helpful for Ofwat to include a few more examples in this category as the wording is much broader when compared to other categories such as “details about the complaints handling procedure” and “the company’s leakage procedures”, both of which are also services the company provides.

Table 1 refers to extending the guidance to expect companies to make Core Customer Information available in a clear and accessible way including giving customers details on every bill they receive on how to access the Core Customer Information. The proposed guidance in section 2 refers to publishing information in a manner which is effective, accessible, and clear but it doesn’t mention including information on bills. We wonder if this is an omission but if not, it may be helpful for Ofwat to include it.

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

Yes, in general. However, we need clarification on what is expected in terms of ensuring customers are notified directly of a change to our Core Customer Information and whether the expectation only relates to a significant change.

We keep our Core Customer Information continually under review. Customers would always see the most up to date version if they visited our website or were sent information in a format suitable for their needs. We also refer to our Core Customer Information with our bills.

The guidance infers a direct “all customer” communication is required each time a change is made, and it doesn’t state that the change needs to be significant.

If a direct “all customer” communication is needed, it would be helpful to confirm that a statement on bills about how to find the information and what has changed would be acceptable and/or an alert on the website. Ofwat are not expecting companies to send a separate communication to every customer by letter, email, or text for example each time a change is made.

**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?**

Yes, we agree and already consult with CCW on all of these areas. We find their input very helpful.