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Service for all – Ofwat's final vulnerability guidance for water companies supporting customers who need extra help

Ofwat

About this document

This document sets out our final guidance for all water companies in supporting household customers in England and Wales and non-household customers in Wales who need extra help accessing water and wastewater services.

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1. Introduction

Our guidance consists of objectives and minimum expectations of the services that water companies deliver to customers who require extra help and the way they are delivered.

Water companies should deliver all our expectations in full. Companies can still comply with our guidance and take different approaches to our expectations where they have evidence that allows them to show why an alternative approach better meets the objectives in our guidance.

In these situations, companies should clearly demonstrate their reason for departing from the guidance – and be able to provide evidence when asked. We expect any other approaches companies take to be consistent with our objectives.

Our approach is focused on the outcomes that water companies are delivering for customers rather than the precise means by which those outcomes are achieved. It is imperative for all companies to own their approach to addressing the needs of their customers.

We expect water companies to comply with other legal and regulatory requirements which apply at the relevant time. This includes:

- the Water Industry Act 1991 and subordinate legislation;
- Companies' Instruments of Appointment;
- the Equality Act 2010;
- the Security and Emergency Measures Direction;
- Data Protection legislation, including the UK GDPR and the Data Protection Act 2018; and
- the Well-being of Future Generations (Wales) Act 2015 (where relevant).

This is not a complete or exhaustive list and water companies will need to consider for themselves how they comply with all their legal and regulatory obligations. We would also expect companies to anticipate new requirements, and plan and deliver changes to their approach ahead of time.

1.1 How we define vulnerability

We define a customer whose circumstances make them vulnerable as:

A customer who due to personal characteristics, their overall life situation or due to broader market and economic factors, is not having reasonable opportunity to access and receive an inclusive service which may have a detrimental impact on their health, wellbeing or finances.

In our guidance we do not use terms like "customers in vulnerable circumstances" or "situations of vulnerability". Instead we use the following terms:

- We use the term **vulnerability** to refer to the overall topic. This provides clarity for stakeholders and companies and reduces potential for confusion.
- We use the term **extra help** to describe the many ways in which companies can provide tailored support for certain customers.
- We use the term **customers who need extra help** to describe customers who without this tailored support may not have reasonable opportunity to access and receive an inclusive service.

This guidance covers the types of extra help that companies can offer to reduce the risk of detrimental impacts on customers' health and wellbeing. This guidance is therefore focused on **non-financial vulnerability**.

1.2 Who this guidance applies to

This guidance applies to all water companies, by which we mean those holding an instrument of appointment for an appointed area as a water and/or sewerage undertaker. This includes new appointees, also known as NAVs, which are small water companies that typically supply some new housing developments. We are proposing that the licence condition should apply to household customers in England and Wales. It also applies to companies' treatment of business customers (also referred to as non-household customers) where they are not supplied by a retailer: in practice this means all but the largest business customers of Welsh companies, and business customers of new appointees in both England and Wales.

The objectives and expectations we set out in this guidance are equally applicable to the treatment of all customers served by companies set out above. At the same time, we understand that the guidance may be applied in slightly different ways in some circumstances.

Therefore, we propose that if a company – particularly new appointees, and those supplying business customers where they are not supplied by a retailer – believes that their circumstances will require an alternative approach to meeting the expectations in the guidance, then this should be set out explicitly as part of their vulnerability strategy (c.f. our Objective 5: Vulnerability strategies).

2. Objectives

We are setting companies five clear objectives for supporting customers who need extra help. Each of these objectives is supported by more detailed minimum expectations, which are set out in section 3 of this guidance.

We explain below what each objective means.

Objective	What it means
1. High standard of service and support	Companies should provide high standards of service and support to customers requiring extra help. Customers who need extra support receive it and are happy with the service provided. Customers know what extra help they can expect from their company. Companies aspire to improve levels of service and seek to ensure that customers who have extra help needs are no less satisfied with their service than customers as a whole.
2. Inclusive by design	Water companies' systems should be designed to meet the needs of their diverse customer base. Services and communications should be designed in an accessible and inclusive way that does not harm customers who have undeclared extra help needs. Companies should collaborate with service users and subject matter experts in designing their services.
3. Identifying customers	Companies should have systems in place to effectively identify customers who may have extra help or support needs; and those customers who are willing or able to self-declare these needs should be able to do so easily.
4. Recording needs	Customers' extra needs should be effectively recorded and reviewed, with customers informed about how their data is used and their views around privacy understood and taken into account
5. Vulnerability strategies	Companies should have strategies in place to support the extra help needs of their customers. Companies should consider and plan how they can deliver extra help to all customers who need it in the short, medium and long term.

3. Minimum expectations

Each of our objectives is supported by a set of minimum expectations. These expectations aim to provide clarity for customers, companies and stakeholders about how we expect companies to work towards meeting our objectives.

Below, we list our minimum expectations under each of our objectives.

Objective 1 – High standards of service and support

Minimum expectation 1.1: Companies should adapt their services to customers in line with any known extra help needs. This is especially important during times where there is increased risk of harm; for example, during incidents.

Because some extra help needs are of a transient and dynamic nature, it is unlikely that even the highest performing company is going to be aware of every requirement of each of its customers in real time. Therefore, when a company does have the benefit of knowing that a customer needs extra help – for example, when the customer has been registered on the priority services register – it is vital that this knowledge is used effectively to prevent harm.

Companies should consider which of their services can be adapted to accommodate known extra help needs. This should include the full range of company operations. Providing adapted support during incidents is especially important, because water service interruption can have major and potentially life-threatening impacts on certain groups of customers.

These adaptations are likely to include:

- Offering a range of different communications channels and adaptations to suit different customer needs (for example, large print bills, alternative languages, Easy Read communications, telephone bill reading, etc);
- During incidents, delivering bottled water to customers' homes who require a constant supply of water or are likely to be unable to easily collect water from distribution points;
- Offering different ways to pay bills and other essential customer interactions, for example, via third party billing;¹
- Offering different options for accessing customers' homes, including password or knock-and-wait schemes; and,

¹ This support may be especially helpful for customers who do not make their own decisions, including those who have made a Power of Attorney. The UK Regulators Network has published guidance for regulated firms on supporting these customers: UKRN - [Supporting customers who do not make their own decisions](#)

- Ensuring that customers are able to check their water consumption at reasonable intervals via accessible channels.

The above list is not exhaustive. Companies should consider what adaptations are required to accommodate each customer's needs.

Minimum expectation 1.2: Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.

Customers have a right to know the likely level and nature of support they will receive from their company. This is especially important for customers who need extra help because it can allow them to plan accordingly for different situations, thereby further reducing their risk of harm.

For example, this should include the circumstances where bottled water will be provided to priority services register customers during an incident. Providing customers with this kind of information can help customers to plan ahead of potential incidents, including working with family, friends or neighbours to put extra plans in place to give support.

Conversely, if a customer does not understand the level and nature of support they are likely to receive, then any such planning may be based on incorrect assumptions. This could lead to reduced trust in their company or, most importantly, heightened risk of harm.

Companies should consider how best to inform customers who need extra help about the adaptations they will receive. In particular, this information should be actively provided to customers when they register for extra help services such as the priority services register. The information should be made available in accessible formats. This information should also be shared with customer-facing third party organisations, so they can advise customer appropriately.

Companies should also make it easy for customers who are not satisfied with the provision of extra help they required– for example, during incidents – to contact their company and seek redress.

Minimum expectation 1.3: Companies should seek to continuously improve the service they provide to customers who need extra help. This may include finding innovative ways to design or implement services.

Companies' approaches to delivering extra help to customers should not be static. Even companies with strong approaches to vulnerability are likely to have room for improvement in some areas, and companies should look to challenge themselves to further reduce the risk of harm to customers who need extra help.

We have seen a great deal of innovation in the vulnerability space over the last decade, including the development of data-driven approaches to identification and sharing of information. Companies should consider the scope for designing and implementing their services in new and innovating ways, weighing up the potential benefits to customers against any risk of harm.

Minimum expectation 1.4: Companies should use a range of data to monitor the effectiveness of their extra help services, and the satisfaction levels of customers who have made such needs known.

Extra help that companies provide to customers should be effective in reducing vulnerability in relation to the customer's interaction with its water company and potential harm. If companies are not able to monitor and assess the quality and effectiveness of their extra help services, they are likely to miss potential areas for improvement, which risks causing their customers' avoidable harm.

Companies should use a range of data from both internal and external sources to track the effectiveness of the extra help they provide. This may include, but is not limited to:

- Survey data from customers who need extra help;
- Direct qualitative engagement and shared experiences from customers who need extra help;
- Operational and system data;
- External assessments and reviews by third parties; and,
- Internal challenge groups and customer panels.

As well as monitoring the effectiveness of specific extra help services, companies should also seek to monitor the overall satisfaction levels of customers who need extra help. This data should be benchmarked against the wider customer base to ensure customers who require extra help are no less satisfied than other customers.

Objective 2 – Inclusive by design

Minimum expectation 2.1: Companies should interact with customers in a way that is inclusive for a diverse range of audiences. This should be underpinned by relevant insights, which may include research, engagement and accreditation.

Water companies serve a diverse range of customers and communities across their regions. Clearly, different customers have different needs and preferences. This might be due to a specific impairment such as visual impairment, learning disabilities, hearing impairments, or co-ordination difficulties. Equally, many customers may have lower English or Welsh language skills, or low numeracy skills.

In all their interaction with customers, companies should be mindful that there are likely to be many customers with undeclared needs and preferences. This means using plain English or Welsh in customer-facing communications, and considering what accessibility tools can be offered to make communications understandable to a range of customers. Where there is the option of accessing more tailored or bespoke support, this should be promoted prominently.

Solutions should be tested with customers who are likely to need them and, benchmarked where appropriate against economy-wide standards, for example through accessibility accreditations.

Minimum expectation 2.2: Companies should offer their customers a range of ways to interact and communicate. This includes allowing customers to opt for third party billing where appropriate.

As well as making communications easy to understand to a range of audiences, where a customer's specific communication needs is known, outgoing communications should be tailored and adapted as necessary.

This is especially important during an incident. If companies do not adapt their communications, it risks customer harm.

This should also include allowing customers the option of third-party billing arrangements, where a trusted individual is given the ability to manage the customer's account. This is likely to be particularly valuable for customers with reduced capacity, whether or not they have a formal power of attorney arrangement in place.

Minimum expectation 2.3: Companies should consult with CCW, and engage with stakeholders and other customer representatives, when making significant changes to their proposed service offering around vulnerability.

When companies change their arrangements for supporting customers who need extra help, it is important that they take account of the expertise and experience of a range of organisations. This includes CCW, third sector organisations who represent customers with specific vulnerabilities. Companies should also consider direct engagement with affected customer groups where appropriate. Engagement should be meaningful and accessible to a range of audiences.

Objective 3 – Identifying customers

Minimum expectation 3.1: Companies should take active steps to identify customers who require extra help who have not yet been identified.

Companies should strive towards having as comprehensive a picture as possible of the extra help requirements of individual customers in their area. This information will typically be recorded on each company's priority services register.

There are a wide range of proactive steps that companies can take to identify customers who need extra help. This includes (but is not limited to): engagement with local and national charities and support organisations; working with local public sector service providers like councils, social care providers and NHS; and direct engagement with customer groups.

Companies should use these and other methods to grow their records of extra help needs over time.

Minimum expectation 3.2: Companies should take steps to proactively increase customer awareness of the extra help available to those who need it.

Companies should raise awareness of extra help services, such as the priority services register, among their customers. If potential beneficiaries are made aware of those services and the nature of help available, then they are more likely to take up the offer of support. Companies should therefore target these proactive communications in ways that are likely to be seen and understood by those who most need the services.

Companies should also raise awareness of these services across their wider customer base including customers who may not currently require extra help. These customers may require extra help in the future, or could potentially encourage family or friends to register for extra help.

Minimum expectation 3.3: Companies should train their staff to spot potential requirements for extra help, even when a customer has not previously declared it.

Companies should use every interaction with a customer as an opportunity to identify extra help needs. To do this effectively, water company staff should receive appropriate training so they can spot potential needs, and then engage sensitively with the customer to agree any future support.

The type of training required may differ for different groups of staff, depending on the frequency and nature of their engagement with customers. For example, front line operational staff may require different training to call centre staff.

Minimum expectation 3.4: Companies should actively consider how they can reduce communication burdens on customers who need extra help; this could include establishing data sharing arrangements with partner organisations.

Declaring the same extra help needs to multiple different companies or providers can be frustrating for customers, and/or may result in needs not being declared to every provider. For these reasons, companies should look to reduce the number of times that a customer has to declare an extra help need.

Data sharing with partner organisations – such as energy companies and local councils – is one way that these communication burdens can be reduced. Companies should explore whether further data sharing arrangements can help to deliver these benefits more widely.

Objective 4 – Recording needs

Minimum expectation 4.1: Companies should take appropriate steps to record customers' extra help needs. These records should be held securely and in line with wider data protection requirements.

Once a company becomes aware that a customer requires extra help, it should consider how that information should be recorded for the future benefit of that customer. For example: if a company becomes aware that a customer has a health need for a constant supply of water, then adding the customer to their priority services register will allow future services to be tailored in line with that need.

Information about customers' extra help needs is clearly sensitive and requires careful handling. Companies should consider arrangements for data storage and handling carefully, taking account of data protection legislation and any other relevant guidance.

Minimum expectation 4.2: Companies' records should be reviewed regularly to ensure they are up to date.

Companies' records of customers' extra help requirements should be kept up to date and reviewed with an appropriate degree of regularity. This should involve re-contacting customers to ensure that the extra help is still required.

Some types of extra help requirement are likely to only be transitory – for example, an injury that reduces a customer's mobility but can be recovered from. Some types of extra help may be needed for a customer's entire life. In both cases, it is important that companies ensure that they have an accurate and up-to-date picture of the customers' needs.

Minimum expectation 4.3: Companies should consider how their records of customers' needs can be designed in a way that can help deliver wider benefits to their customers; for example, reducing communication burdens for customers through data sharing.

By designing their priority services register in a manner which is consistent with other companies in the water sector, and with other similar registers in the energy sector, a water company can make it easier to share data about customers' needs. This can help to deliver a 'tell us once' style service where customers only need to sign up once to receive tailored services from multiple sectors.

Similarly, in designing their records of extra help needs, subject to confidentiality restrictions, companies should ensure records can be accessed by different teams within the company. For example, if a company's complaints handling team know whether an incoming complaint is coming from a customer on the priority services register, they can ensure that their engagement with the complainant is tailored appropriately.

Minimum expectation 4.4: In designing their approach to recording and, where relevant, sharing customer vulnerability data, companies should clearly explain to customers how their data will be used, including any choices available to them. Companies should take steps to understand how their customers who need extra help feel about the use of their data.

When companies record and share sensitive data about their customers, they have important responsibilities, including holding that data securely, and explaining clearly to customers how that data will be used and the choices available to them. These responsibilities apply irrespective of which legal basis is used for data sharing. Companies should carefully consider how best to design their processes so that these responsibilities are met.

When developing approaches to data sharing, companies should take account of customer views about data use. This may include conducting research or using customer panels to gather views. These insights can help companies understand how best to explain to customers how their data may be used.

Objective 5 – Vulnerability strategies

Minimum expectation 5.1: Companies should develop and maintain a vulnerability strategy setting out how they plan to support the extra help needs of their customer base.

To deliver the objectives and expectations set out in this guidance, each company should develop a vulnerability strategy that sets out their approach to delivering extra help in the short, medium and long term. The strategy should explicitly set out how the company plans to meet each of the minimum expectations set out in this guidance.

The strategy should also set out the information or data that companies will use to understand whether their strategy is on track. This should include clear measurable

commitments or targets that the company expects to meet if its strategy is to be successful. The strategy should show clear evidence of being developed using both customer and stakeholder input and feedback.

This vulnerability strategy should be published on the company's websites and be accessible to different audiences.

Companies should publish their vulnerability strategies in draft form by the end of June 2024. Companies' final vulnerability strategies should be published by the end of June 2025, and should explain clearly where changes have been made from the draft strategy and why.

Minimum expectation 5.2: Companies should take steps to understand the likely underlying requirements for extra help in their areas.

Vulnerability strategies should examine any gap between likely underlying needs and current extra help provided. Companies should explain how they plan to bridge any such gaps.

Companies' vulnerability strategies should examine the level of extra help need that is likely to exist in their areas. This should include analysis of demographic data and should look at trends both now and in the future, so that future vulnerability needs can be planned for.

This data should be used to add extra resilience into companies' vulnerability strategies, so that they can meet potential challenges such as population growth, extreme weather, and an ageing population.

Appendix: summary table of our objectives and minimum expectations

Objective	Minimum expectations
1. High standards of service and support	1.1 Companies should adapt their services to customers in line with any known extra help needs. This is especially important during times where there is increased risk of harm; for example, during incidents.
	1.2 Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.
	1.3 Companies should seek to continuously improve the service they provide to customers who need extra help. This may include finding innovative ways to design or implement services.
	1.4 Companies should use a range of data to monitor the effectiveness of their extra help services, and the satisfaction levels of customers who have made such needs known.
2. Inclusive by design	2.1 Companies should interact with customers in a way that is inclusive for a diverse range of audiences. This should be underpinned by relevant insights, which may include research, engagement and accreditation.
	2.2 Companies should offer their customers a range of ways to interact and communicate. This includes allowing customers to opt for third party billing where appropriate.
	2.3 Companies should consult with CCW, and engage with stakeholders and other customer representatives, when making significant changes to their proposed service offering around vulnerability.
3. Identifying customers	3.1 Companies should take active steps to identify customers who require extra help who have not yet been identified.
	3.2 Companies should take steps to proactively increase customer awareness of the extra help available to those who need it.
	3.3 Companies should train their staff to spot potential requirements for extra help, even when a customer has not previously declared it.
	3.4 Companies should actively consider how they can reduce communication burdens on customers who need extra help; this could include establishing data sharing arrangements with partner organisations.
4. Recording needs	4.1 Companies should take appropriate steps to record customers' extra help needs. These records should be held securely and in line with wider data protection requirements.
	4.2 Companies' records should be reviewed regularly to ensure they are up to date.
	4.3 Companies should consider how their records of customers' needs can be designed in a way that can help deliver wider benefits to their customers; for example, reducing communication burdens for customers through data sharing.
	4.4 In designing their approach to recording and, where relevant, sharing customer vulnerability data, companies should clearly explain to customers how their data will be used, including any choices available to them. Companies should take steps to understand how their customers who need extra help feel about the use of their data.
5. Vulnerability strategies	5.1 Companies should develop and maintain a vulnerability strategy setting out how they plan to support the extra help needs of their customer base.

	5.2 Companies should take steps to understand the likely underlying requirements for extra help in their areas.
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is a non-ministerial government department.
We regulate the water sector in England and Wales.**

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