



The voice for water consumers
Llais defnyddwyr dŵr

9 December 2022

CCW's response to Ofwat's request for comments on its proposed Customer Licence Condition Principles (as presented at its 22 November 2022 workshop)

Introduction

CCW is the independent voice for water consumers in England and Wales.

The Consumer Council for Water (CCW) is a non-departmental public body in England and a statutory body in Wales. CCW is independent of both regulators and water companies.

Executive Summary

We support Ofwat's proposed Customer Licence Condition as it will focus water company boards on doing the right thing for customers.

We welcome that Ofwat has agreed with the suggestions we have made on creating high level principles, which can then be underpinned by more responsive Codes of Practice that can adjust easily as customers' expectations change.

We broadly agree with the draft Principles, but must the Principles must ensure that companies are clear of their need to consult with CCW on issues that matter to customers. There is a danger that this could be lost if Condition G is removed. P3 therefore needs to have strong linkage to CCW's role so that concept is clear.

Ofwat draft Principles and questions from 22.11.22	CCW response
P1 The Appointee must: P1.1 meet the principles for customer care set out in paragraph P2; and	Agree
P1.2 explain in a manner that is effective, accessible and clear how it is meeting the principles set out in paragraph	Agree with including this. CCW is open to taking a role auditing the compliance with the Principles.
P2 P2.1 The Appointee is proactive in its communications so that customers receive the right information at the right time, including during incidents.	Agree

Ofwat draft Principles and questions from 22.11.22	CCW response
P2.2 The Appointee makes it easy for customers to contact them and provide easy to access contact information.	Agree
P2.3 The Appointee provides appropriate support when things go wrong and helps to put things right.	Agree
P2.4 The Appointee learns from past experiences and demonstrates continual improvement to prevent foreseeable customer harm	Agree
P2.5 The Appointee understands the needs of its customers and provides appropriate support [including/especially customers in vulnerable circumstances].	Remove bracketed section as covered in P2.6
P2.6 The Appointee provides appropriate support for customers in vulnerable circumstances.	Agree
P2.7 The Appointee provides a range of appropriate support options for customers who are struggling to pay; and to customers in debt.	Agree
<p>P3 Ofwat may issue and revise guidance to support attainment of the principles. The Appointee shall have regard to, but not be limited by, such guidance in meeting the principles. [Guidance issued by Ofwat under this condition may include a requirement that the Appointee consult the Consumer Council for Water and take its representations into account before making or revising any policies or processes which relate to matters covered by that guidance.]</p>	<ul style="list-style-type: none"> • Remove the bracket. • Change ‘may include a requirement’ to ‘will include a requirement’ • Add to ‘matters covered by’ “the Principles or that guidance.”
<p>Condition G – Core customer information Clear overlap between this condition and our suggested condition, and its principles 2.1, 2.2 and 2.3. Our initial thinking is to make revise condition G into a customer-focussed, principle-based condition, with the current detail in guidance.</p>	If Condition G is removed, there needs to be strong linkage to CCW’s role in P3, so companies are clear of their need to consider CCW’s views when considering issues that affect customers.
<p>Role of a compliance statement</p>	We support Boards submitting a compliance statement as it will ensure Boards are focused on delivering for customers through this licence condition

Enquiries

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