



The voice for water consumers  
Llais defnyddwyr dŵr

**CCW's response to Ofwat's  
Consultation under sections 13 and 12A of  
the Water Industry Act 1991 on proposed  
licence modifications to introduce  
customer-focused principles for all water  
companies**

**November 2023**

## **Introduction**

1. The Consumer Council for Water (CCW) is the statutory consumer organisation representing household and non-household water and sewerage consumers in England and Wales. We welcome the opportunity to provide a response to Ofwat's consultation
2. We are pleased to have been able to provide our views to Ofwat as it has developed its thinking on the proposed customer licence condition. We have also undertaken customer research<sup>1</sup> jointly with Ofwat to help ensure that people's views, expectations and experiences feed into this work and are central to the outcomes it will drive for them.

## **Our response**

3. CCW welcomes the proposed introduction of a customer licence condition. We believe that the legal duty created can help ensure the industry gives appropriate focus to meeting the needs and expectations of people into the future. We also recommended the introduction of the customer licence condition in our 2021 independent review of water affordability for UK and Welsh Governments.<sup>2</sup>

**Proposal to delete current Condition G and replace it with a new customer focused licence condition, the wording of which is set out in Annex 1 of the consultation document.**

4. We support the replacement of Condition G with the new customer focussed licence condition as set out in the consultation document.
5. We welcome the inclusion of a requirement for appointees to consult the CCW, where appropriate, in developing policies and approaches to meet the principles for

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<sup>1</sup> Ofwat/CCW Customer Licence Condition Research <https://www.ccw.org.uk/publication/customer-licence-condition-research/>

<sup>2</sup> CCW - Independent Review of Water Affordability <https://www.ccw.org.uk/our-work/affordability-and-vulnerability/affordability-review/affordability-review-recommendations/>

customer care set out in the licence condition, building on our role set out in the currently set out in licence condition G.

6. We note that Ofwat plans to set out the areas which CCW should be consulted on when it publishes its Core Customer Information guidance. Although not necessarily an exhaustive list, we support the areas currently identified by Ofwat for potential inclusion:
  - Affordability & Vulnerability;
  - Creation of and subsequent significant changes to customer facing information on what help customers should expect in incidents;
  - Water company Business Plans, as part of the Price Review;
  - Water companies' approach to having a customer-centric culture;
  - Complaints code of practice;
  - Information that describes CCW on bills and on their website.
  
7. We are keen to continue to contribute to Ofwat's work to develop guidance documents supporting the principles set out in the new licence condition. We note the plans for this set out in Ofwat's response document to its earlier consultation.<sup>3</sup> We welcome the intent to issue guidance on the management of incidents and events informed by our ongoing joint research with Ofwat on customers' experiences of such events.

### **Proposal to delete Condition J**

8. We support the deletion of Condition J given the relevant requirements of this condition are already provided for within other licence conditions.

### **Enquiries**

Please address enquiries about this consultation to:

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<sup>3</sup> Responses and conclusions to ['Putting water customers first: A consultation on introducing a customer-focused condition into the licences of all water companies in England and Wales'](#)