

CONSUMER COUNCIL FOR

CYNGOR DEFNYDDWYR



# *Vulnerability in the water sector*

Informing, supporting and protecting consumers



## *A word from our Chairman*

Addressing the needs of those who find themselves in vulnerable circumstances is priority for CCWater. We will continue to push the sector in this area and press for innovation that will truly benefit consumers.

Water companies have already made a good start in offering consumers a tailored service based on individual needs. However, the spell of severe cold weather in February 2018 starkly demonstrated that water companies still have a lot to do to assist customers in vulnerable circumstances.

There are some key challenges for all of us:

- making sure customers are aware of the vulnerability support available
- offering the right vulnerability support for customers; and
- delivering vulnerability support to customers at the right time

Collaborative working and sharing good practice are key to meeting these challenges.

This report shares good practice, shows areas where the industry has already taken on board recommendations from our 2016 Special Assistance Scheme Review report and suggests further areas that all water companies should build into their 'business as usual' approach to taking care of vulnerable customers.

**Alan Lovell**  
Chairman





## About CCWater

Securing the best outcomes for all water consumers – present and future

The Consumer Council for Water (CCWater) is the statutory body representing water consumers in England and Wales. We shape the water sector by informing and engaging consumers and taking action to ensure their voices are heard by decision makers within industry, regulation and government.

**We seek to ensure all current and future, household and business consumers:**

- receive water services that are easy to access for all
- consider bills and charges to be fair and good value for money
- receive a good service that's right first time, and protection when things go wrong
- have safe, reliable water and wastewater services that everyone can trust – both now and in the long term

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In our Forward Work Programme 2016 – 2019 we have committed to “work with other organisations and the industry to identify good practice for assisting consumers in vulnerable circumstances and press companies to provide access to an inclusive service for all water consumers.”

This document aims to follow up on the progress that has been made towards achieving the recommendations made in our report from November 2016. By gathering together examples of good practice from the water industry and beyond, we hope to inspire the water sector to take a more innovative approach to providing inclusive services for all.

We’ve used these examples of good practice to show how water companies can meet three core challenges in delivering priority support more effectively: raising awareness, offering the right support, and delivering the right support at the right time. Overall, it’s clear that collaboration is key to designing services that work for consumers. Our examples show that by working together with other organisations – such as local councils, cultural groups and emergency services - water companies have successfully reached out to a wider range of consumers to make sure that as many people as possible are aware of what help is available should they need it, now or in the future.

*Priority services, as captured in the priority services register, play an important role in ensuring water companies deliver an inclusive day-to-day service to all of their customers. But during times of incident or emergency – like the spell of severe cold weather in February 2018 – some consumers temporarily find themselves in vulnerable circumstances. As such, it’s important that water companies don’t rely solely upon this register, but take a more dynamic approach to identifying and assisting all consumers.*

February’s cold snap highlighted the importance of communication in reaching out to consumers, but it’s not just during severe weather that communication is important. We have highlighted ways in which water companies can use a range of communication tools to reach out to consumers all year round, making every contact count towards building positive relationships with the communities they serve and raising awareness of the additional support services available.

Water companies need to learn from each other, as well as from good practice examples from other sectors and countries, such as the use of technology such as Robobrain and automated website translation tools.

We want the water sector to build on the progress that has already been made, with the ultimate goal of ensuring that the protection of vulnerable consumers is truly embedded in every company’s culture.



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We are pleased that, over the last few years, the subject of vulnerability has become a more central focus in the water industry. We have seen some good practice and a genuine desire by companies to improve.

The extreme freeze-thaw event in late February / early March 2018 put a spotlight on the industry and showed that although some companies have made progress helping customers in vulnerable circumstances, there is still a long way to go. CCWater conducted research following this event, which found that consumers in vulnerable circumstances had not been properly identified and catered for. The vast majority (93%) of those identifying themselves as vulnerable, in the worst affected areas, felt that they did not receive the support they needed. [A link to the full report can be found here.](#)

CCWater is passionate about driving best practice in this area to ensure the good practice inclusive service is available for all consumers, no matter where they live or what their needs are. We want companies to respond to this challenge and so in this report, we're sharing good practice from across the industry and highlighting progress against the recommendations we made in our "Special Assistance Scheme Review Report" published in November 2016.

We talk about a number of key areas across this report:

**Priority services** – Additional services and support offered by companies to meet different needs. This ranges from services like braille bills and doorstep password schemes to providing bottled water to customers' homes in the event of supply interruptions.

**Safeguarding** – Action taken by companies to promote the welfare of adults and children and protect them from harm.

**Community Vulnerability** – Where an incident places a whole community at risk of harm. Examples of this are communities that have had a water quality incident such as a boil water notice, or communities that have no water supply due to drought/freezing conditions.

**Transient vulnerability** – Usually when a consumer finds themselves in vulnerable circumstances for a short period of time. This could be due to a short term illness or sudden job loss. External factors can also place someone in vulnerable circumstances, for example, many people who would not usually class themselves as facing vulnerability became vulnerable when pipes froze and then burst due to the severe weather in early 2018.

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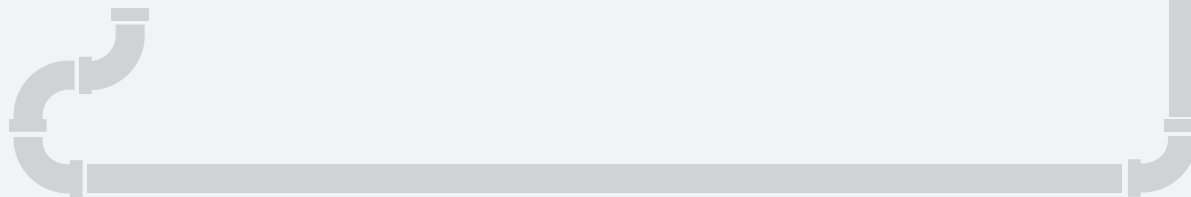
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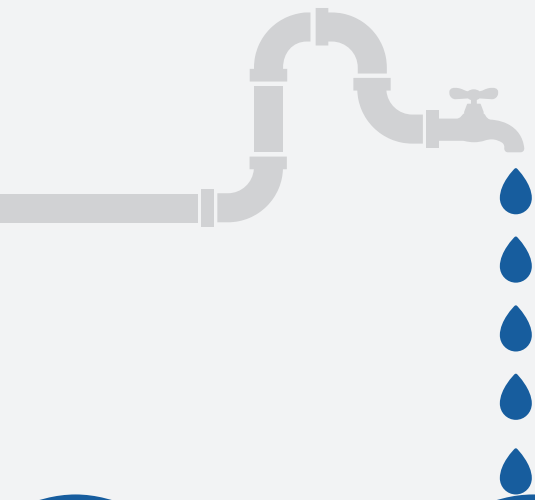
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In 2016 we made a series of recommendations to the water industry to improve awareness of the support available for water consumers, offering the right support, and delivering the support at the right time.

One of these was to change the names of all assistance schemes to be consistent with each other and those offered by other utilities. As a result, all schemes are now labelled 'Priority Services'.

**+ 18%**

In 2017/2018 there were 364,032 customers registered for priority services, an increase of 18% on the previous year.

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# Progress across the industry

Challenge	Key CCWater Recommendations from our “Special Assistance Schemes Review Report” published November 2016 found here.	Progress by companies
Raising awareness	A consistent industry wide name for support schemes.	All water companies now have schemes called “Priority Services”.
	Promotion of schemes to partner organisations to build awareness, and potentially increase the number of people registered on the scheme.	The most significant improvement noted has been the increased focus and effort in promoting the scheme and engaging with customers.
	Companies should seek ways to make every contact count. Promoting support schemes internally to employees is important so that everyone knows it’s a priority and a message they need to share at every opportunity.	All companies send Priority Services information with the bill. 15 companies have plans in place to make customers aware of the additional assistance offered by having information in/with a welcome to new home/new account pack. 12 water companies make customers aware of the additional assistance offered by specifically making information available during an incident. 10 companies conduct follow up research after a major incident to establish whether customers felt they needed more help.
Offering the right support	A consistent level of core support should be offered.	Support is more consistent than ever but there is still work to be done in this area.
Delivering the right support at the right time	<ol style="list-style-type: none"> <li>1) Make registering and accessing support easier for consumers.</li> <li>2) Water companies and other utilities would benefit from working collaboratively to make support schemes more consistent for consumers, sharing data on customers who are on the schemes and promoting awareness of the schemes.</li> </ol>	<p>9 out of 21 water companies have already formed local data share agreements and an additional 7 are in the process of forming the same. A water and energy wide project led by Water UK is also underway to explore how utilities can work together so customers only need to consent to registering their needs with a utility company once and they will then receive consistent support from all of their utility providers.</p>
	<p><i>Companies should use:</i></p> <ol style="list-style-type: none"> <li>1) Local resilience data on known locations for vulnerable people e.g. care homes, schools, hospitals.</li> <li>2) Proactive research and communications data to identify the best method of communication in an incident e.g. is the area digitally enabled?</li> <li>3) Demographic data to highlight areas in their region that may require additional support.</li> </ol>	<p>More focus is needed to identify high risk areas and proactive plans need to be put in place. This should cover logistics, communications and partnerships to ensure, should an incident occur, residents are aware of what has happened, what help is available to them and how to access such help.</p>

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## Focusing on good practice

Evidence from companies has shown us that collaboration is key to achieving the best possible inclusive service for everyone.

We'll now explore this in more detail across three key areas:

- Raising Awareness
- Offering the right support
- Delivering the right support at the right time

We will explore how collaboration can take different forms with different partner organisations to maximise impact.

We have provided examples of good practice with real case studies to show how water companies have put in place initiatives that have really benefited their consumers.

Themes that are applicable across all three of our key areas:

Sharing resources to provide face-to-face support to consumers. If organisations pull together resources and funds, more consumers will be able to get face-to-face assistance. This is often vital in building trust, getting the right assistance to the right people and increasing awareness of the services offered.

Joint promotional initiatives. Working together to promote services that are available to all is the best way to reach the maximum number of customers and - if targeted correctly - those that are hardest to reach.

Using pilot schemes to test effectiveness of initiatives. Piloting projects ensures that they will truly bring benefit to consumers before a lot of money is invested. It also means multiple options can be tested.

Informing and training. Water companies informing external organisations about the services and assistance they offer, and providing training on how other organisations can make applications on behalf of those they represent.

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## Collaboration with local housing associations

### Good practice

Water companies participating in tenant engagement events to give consumers information on the services they offer.

Dedicated resource within water companies to facilitate liaison with housing associations.

### Case Study

A large number of customers who were previously billed by their housing association were switching to being billed directly by Sutton and East Surrey (SES) Water. The company designed a new “welcome pack” for these customers. The packs contained details of Priority Services as well as financial assistance schemes. In addition to this, it set up a dedicated customer service team to support this transition in billing and worked in collaboration with the housing association and housing agency, Orbit. The housing agency agreed to provide information on the water company and its services in its regular communications to tenants. They also agreed to provide support with home appointments for those customers who were harder to reach.

**Thames Water** carries out water efficiency visits for customers of eight housing associations. During the visits they also promote Priority Services.

**Severn Trent Water** partnered with Aspire housing on a joint door-knocking activity. They carried out 154 water health checks and signed up 54 customers to Priority Services.

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# Collaboration with Local Councils and Parish Councils

## Good practice

Local council promotional initiatives e.g.:

- promoting priority services offered by water companies to blue badge holders and/or customers requiring assisted bin collections

Other joint promotion initiatives where networks, forums or partnerships promote the water company schemes for vulnerable customers to members of the public they support. Some examples are:

- Financial inclusion partnerships
- Homelessness prevention forum
- Local resilience forums

Water companies engaging with social services to help promote priority services/safeguarding assistance.

Water companies participating in council residents engagement events.

Relationship building by water companies collaborating on projects with local councils to help the local community.

## Case Study

United Utilities, in collaboration with Salford Council, promotes Priority Services to all Blue Badge holders (800 applications per year). Plans are in place to contact all other local councils in the North West now that the Salford Council pilot is underway. Expanding this scheme would potentially reach 300,000 blue badge holders throughout the North West.

United Utilities is also working with Salford Council on a pilot scheme to promote Priority Services within the Salford Welfare Rights and Debt Advice Service via home visits.

Discussions are also being held with the Rural Services Network on how it can promote the company's Priority Services within rural areas including using the Rural Housing Alliance.

**Anglian Water** has agreements in place with a number of district councils in Lincolnshire to promote Priority Services to residents who have signed up for assisted bin collections.

**Thames Water** has collaborated with Seasonal Health Interventions Network (SHINE) which refers a council's customers to support schemes such as Priority Services.

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# Collaboration with Local Advice Agencies

## Good practice

Local advice agencies attending meetings with water companies on the price review for 2020-2025 where key decisions on investment and prices are being made.

Relationship building by collaborating on added value help for the community, such as involvement in community projects e.g. decorating a community centre or revitalising a playground.

**South West Water** and **Bournemouth Water**, together with Plymouth Citizens Advice Bureau, fund the Water Debt Gateway which details advice on Priority Services and financial assistance. It is accessible to Citizens Advice Bureaux across the region.

**Yorkshire Water** is working with Rotherham Citizens Advice Bureau to help identify, signpost and process applications for customers it might not usually reach, such as those with changes in circumstances due to a 'life-changing event'.

## Case Study

Wessex Water has a Partner Hub, which is an online engagement tool allowing partners in the advice sector to keep in touch with the company and each other. They can also use the hub to obtain information on the services available and training materials.

The hub enables the advice sector to advertise their own events and support, request company attendance at community events and order resources to raise awareness of support.

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# Collaboration with Local Fire and Police Associations

## Good practice

Water companies collaborating with the fire service on campaigns to assist consumers.

Water companies collaborating with Neighbourhood Watch groups.

**South West Water** and **Bournemouth Water** work in partnership with the fire brigade in promoting Priority Services at the same time as conducting free home checks/fitting smoke alarms.

## Case Study

Dŵr Cymru has been working with the Police and Crime Commissioner for Gwent on sharing data relating to vulnerable customers with critical groups e.g. Age Cymru. The group is called “Protecting our Elderly Together Forum”.

It has also been working with South Wales Police and South Wales Fire Services to share good practice.

The company attends:

- PCSO training sessions with the South Wales Police Force (Barry and Bridgend area) and is now distributing its Priority Service booklets in the community.
- Crime Prevention and Safety Evenings which have been organised by South Wales Police Force and Neighbourhood Watch.
- Emergency Services Events organised by the South Wales Police.

**Hartlepool Water** has a partnership with Cleveland County Fire Brigade where they promote the priority services offered by Hartlepool Water as part of their ‘safe and warm’ visits to local residents.

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**South West Water** and **Bournemouth Water** promote Priority Services in their work with the local hub for the Royal British Legion as well as Action for Children centres. They also engage with Age UK day centres, attend foodbanks and work with other local organisations such as carers and friendship groups.

**South Staffs** and **Cambridge Water** engage with a wide range of community groups to include those who have definite links to their Priority Services, for example OSCAR, which is a support group for those affected by sickle cell disease.

**Hafren Dyfrdwy** has visited local black and minority ethnic community groups in Wrexham to deliver awareness sessions on Priority Services.

**Severn Trent Water** has delivered training sessions to groups of carers from the Chinese community, which were arranged through Carers Trust. The sessions were delivered in English and then translated.

**South East Water** is building relationships with the local Nepalese community and identifying ways of communicating with other smaller groups. It has also presented to the local Nepalese community on a radio show using a translator to improve awareness of services.

**United Utilities** is creating Priority Services Ambassadors, recruiting from within their existing workforce, to help promote Priority Services within the smaller, more local communities around the North West.

## Collaboration with Local Cultural and Community Groups

### Good practice

Training and deployment of water company cultural/community champions to help promote assistance to smaller, more local communities and cultural groups.

Water companies participating in cultural events, festivals and community events.

Water companies targeting community/cultural groups that may be most likely to benefit from priority services.

Water companies using translators to improve awareness.

Thames Water & LSX (London Sustainability Exchange) collaborate on a joint project called Faith & Utilities.

This project has been launched between Thames, London Sustainability Exchange, UK Power Network and Scottish & Southern Electric to support the Islamic community with utility bills and how to reduce them, aiming to tackle fuel and water poverty and to increase awareness of Priority Services .

The project involves training champions to work with mosques to gain trust which will increase the likelihood of support being taken up.

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# Using Media and Social Media

## Good practice

Water companies using local community radio / regional TV.

Local editorial pieces in regional papers.

Water companies maximising audience by sharing messages across a wide range of social channels.

Water companies linking in with other national awareness / local awareness social media campaigns.

Water companies using / linking to the right community pages and groups on social media when an incident occurs.

## Case Study

Northumbrian Water and Essex and Suffolk Water worked with Digital Film Production TV on Community Engagement Roadshows at seven locations in shopping centres across the companies' operating areas (north and south).

The company:

- Engaged with a large number of customers
- Increased sign up levels of customers to vulnerability schemes
- Received constructive feedback on the services they currently offer

**Anglian Water** uses Facebook and Instagram, including targeted promotion during Carers Week. They also promoted Priority Services on Twitter in conjunction with a campaign run by Northamptonshire Police on distraction burglary.

**Affinity Water:** Following a water incident, the company used Facebook & Twitter to promote Priority Services, providing a link to the company's website

**Thames Water** regularly shares updates with 30,000 followers across Facebook and Twitter.

**United Utilities** has carried out a regional local radio campaign on Priority Services. A series of radio interviews were aired in 2017.

**Southern Water** –Community Engagement Campaign including short information films that will reach customers through Facebook and Twitter. Other media routes.

**Wessex Water** scheduled week-long media campaign targeted in the Bournemouth area. Including paid Facebook adverts and editorial text in the local media.



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# Making every contact count

## Good practice

Information about the water companies support schemes is:

- Included with the bill.
- Included with a welcome to new home/new account pack.
- Included in communications making customers aware of or updating on a water/sewerage incident.

Industry wide/ individual company research with customers in vulnerable circumstances to identify their views on satisfaction, fairness and awareness of services.

Cross matching complaints data with customers that companies are aware are in vulnerable circumstances to find trends and identify ways to improve service provided.

Water companies conducting follow up research after a major incident to find out if customers were satisfied with the communications and support they received during an incident, as well as whether they were satisfied with any compensation provided.

**15 companies** have plans in place to make customers aware of the additional assistance offered by having information in / with a welcome to new home / new account pack.

**12 water companies** make customers aware of the additional assistance offered by specifically making information available during an incident.

**10 companies** conduct follow up research after an incident to establish whether customers felt they needed more help.

**All companies** make customers aware of what priority services are available by including information in/with the bill.

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# A consistent level of core support should be offered.

## Good practice

All water companies should offer a consistent level of core assistance, which we have detailed in the table.

We expect companies to offer enhanced assistance wherever possible and innovate to improve what's available and how to make consumers aware.

Water Companies should involve consumer groups and representative bodies in the design of their support services to ensure they are fit for purpose.

Water companies should bring inspiration from outside of the water industry such as Robobrace and SiMAX avatar technology\*.

Water companies taking advantage of automated website translation tools.

\*SiMAX avatar technology is a sign language translation machine

Core Assistance presently offered ✓

Core Assistance we think should also be offered by all companies ♦

## Safety

### Water Industry

Advance supply interruption notice	✓
Priority reconnection if supply interrupted	
Personal supply interruption notice	✓
Emergency water supply (for those who medically need it, need to take lots of medication, have mobility restrictions, nursing mothers, have children living in the house who need regular bottle feeds).	✓
Alternative facilities for cooking and heating	
Free annual gas safety check (see note on page 18)	
Password Scheme	✓
Identity Check of employees	✓
Company follows the principles of UK Water Industry Distraction Protocol	♦
Company follows the principals of National Cold Call Protocol	♦

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## Mobility

	Water Industry
Knock and Wait – giving a longer time to answer the door	◆
Help if flooding (caused by a company asset) occurs	◆
Meter moved if you cannot read the meter in its present location	✓
Help reading the water meter	✓
Quarterly meter read	
Move a prepayment meter (refer to footnote 12 on page 17)	

## Signposting to other assistance

	Water Industry
Signpost to help for those struggling to pay	◆
Signpost to where to get water devices and water aids	◆
Signpost to energy & telecom priority services	◆
Signpost to approved plumbers scheme	◆

## Accessibility

	Water Industry
Promotion of accessible public buildings (where relevant)	◆
Promotion of accessible leisure facilities (where relevant)	◆

Core Assistance presently offered ✓

Core Assistance we think should also be offered by all companies ◆

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## Accessible Communications

	Water Industry
Accessible website	◆
Help understanding your water bill	✓
Help to make arrangements to pay your water bill	✓
Nominated contact – e.g. friend, relative or carer	✓
Home visits	✓
Large print	✓
Braille	✓
CD	✓
Audio tape	✓
Text phone	✓
Type talk/Text relay	✓
Minicom	✓
Personalised call assistance e.g. Speaking slower/giving longer thinking/response time	◆
Web chat (ideally with a “still here” button if it’s a timed transaction).	◆
Alternate colour background documents	◆
Sign language/subtitled videos on website	◆
Sign language home visits	◆
Alternative language formats	◆
Interpreter services	◆

Core Assistance presently offered ✓

Core Assistance we think should also be offered by all companies ◆

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# Collaboration with other Utilities

## Good practice

Water and energy companies working together on data sharing of Priority Services Registers to ensure customers are signed up across both utilities.

Joint enrolment forms / sign up schemes.

Innovative promotion and partnerships – e.g. with pharmacies (promotion on medication bags, editorial pieces in specialist publications) or the fire service – (home safety checks) and flu jab clinics.

Water companies attending meetings and events for vulnerable customers that are held by other utilities and vice versa.

**Thames Water** and **UK Power networks** have designed a joint promotional leaflet with a tear-off reply to enable consumers to join both registers and companies to share data.

## Case Study

Northumbrian Water and Essex & Suffolk Water are working with Infrastructure North - a collaboration between Northern Gas Networks, Northern Powergrid and Yorkshire Water.

Work has included producing a joint leaflet entitled 'Safe, warm and in control', an Infrastructure North website and an editorial piece in the 'Golden Guide'. (This publication is delivered to people in the North East area by health professionals, including Adult Social Care teams, Occupational Therapists, GP surgeries and charities that deal with older people. It is also supported by Age UK.)

**United Utilities** and **Electricity North West** are promoting their support schemes in 200 pharmacies in the North West, including promotion on medication bags.

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- *Collaboration with other utilities*
- *Using data to identify communities at risk*

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# Finding new ways to identify communities and individuals at risk

## More needs to be done

Incidents such as flooding, bursts, boil water notices and drought all have potential to put whole communities in vulnerable circumstances. As such, lessons learned from previous major incidents and shared with the industry made it clear that companies cannot rely solely on the information held on their priority services registers to identify who may need additional help during an incident.

Companies should take responsibility for their customers and think more widely at the point of an incident. The questions that should be on the companies mind is what does the customer need and want?

Community vulnerability strategies should aim to identify high risk areas and put proactive plans in place that cover logistics, communications and partnerships to ensure that community residents are aware of what

has happened, what help is available to them and how to access such help. The companies' handling of the water supply problems caused by the spell of severe cold weather in February 2018 demonstrated that companies need to develop and embed these strategies as a priority.

Whilst companies work with local resilience forums and are responders in a Cobra incident\*, we feel there is still more that companies can do proactively for vulnerable customers, particularly before an event occurs.

There is much data available to highlight potential areas of risk and therefore potential communities at risk and companies should be making full use of this. A good example of this is that Northumbrian Water has enhanced its policy to take into account the Joseph Rowntree Foundation report entitled "Targeting flood investment and policy to minimise flood disadvantage."

\*An emergency council, Cobra meets to discuss high-priority issues that cross departmental borders within government

**Northumbrian Water** has changed its mitigation policy for when flooding occurs in exceptional circumstances. Customers in vulnerable circumstances will now be prioritised for investigation of any possible mitigation measures.

Flood risk reduction schemes for disadvantaged areas can sometimes be prioritised as part of a water company's partnership projects work with Flood Defence Grant in Aid (National Defra funding administered through the Environment Agency).

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## ***Next Steps***

The industry still has a long way to go to offer consumers a truly tailored service that's based on individual needs.

This report has highlighted some good practice and examples of great service which is already offered by many water companies. We will continue to press companies to follow our recommendations.

CCWater will be checking if companies are continually reviewing their vulnerability plans to take account of incidents such as the freeze-thaw in February / March 2018 and the prolonged period of hot weather in summer 2018. We expect companies to learn from events both in their own area and others to ensure they provide a better service in the future.

We held our first consumer vulnerability seminar in February 2018 which covered many topics including: Company progress, water & energy working together, innovation and safeguarding.

We intend to follow up from this successful event with a future seminar to share further good practice, ideas and initiatives in the area of vulnerability and affordability.

***We will continue to encourage innovation and the sharing of good practice in informing, supporting and protecting consumers.***

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