

christians
against
poverty

CAP

Priority services registers – a consultation on standards for water companies in England and Wales

CAP's official response to the
Ofwat consultation

November 2024

Summary

CAP is encouraged that Ofwat is conducting this consultation to consider the future of the Priority Services Register (PSR) to make it as positive as possible. CAP would encourage Ofwat to take this exploration further and explore concepts such as a single PSR system covering the entirety of water and energy provision to bring consistency and increase impact. CAP promotes the practice of engaging with people with first-hand experience and would encourage Ofwat to work with people who personally engage with PSR application and provision to ensure the process works effectively and is communicated in a way that people can engage with it. CAP agrees with the majority of the proposals, but sees potential for standard minimum requirements and good communication practises to bring benefits in national communication and understanding of this scheme.

Key points:

- **Prioritise user experience:** Engage with individuals who have directly experienced the PSR process, both positive and negative, to gather insights to improve the standards going forward.
- **Consider a joint PSR system:** Explore the potential benefits of a unified PSR system across all essential services, which could simplify the process for vulnerable customers.
- **Proactively reach out to vulnerable individuals:** Implement strategies to proactively identify and support vulnerable customers, ensuring they are aware of and can access the necessary support.
- **Standardise PSR requirements:** Establish clear, minimum standards for all water and wastewater companies to ensure consistent support for vulnerable customers across the industry.

1. Are there any other relevant sources of insight or feedback we should look to as we finalise our standards?

CAP would encourage Ofwat to engage people who have first-hand experience of personally engaging with the process of registering for the service, and receiving help from it. By speaking and working with people who have experience of successfully navigating the PSR process and receiving the support they needed, but also with those who have had less of a positive experience, it may help provide insights and feedback that can make sure the development puts users' needs at the heart of the standards.

CAP would also suggest speaking at this stage to other regulators. This is particularly important in the consideration of a future where there can be joined-up PSR processes. To further develop thinking in this area, there would be value in speaking to those currently researching a single PSR system. A single PSR that combines water and energy registers would provide a process that is easier for vulnerable clients to navigate, and would help provide a clear message nationally for uptake.

2. Are there any additional areas that you believe should be covered by our PSR standards?

There could be value in adding a particular area that covers the need to proactively reach out to those who are vulnerable and to establish effective signposting. This will ensure those who need support are aware of it and able to receive what they need.

3. Do you agree with our proposal to require all water and wastewater companies to have a PSR?

CAP agrees with the proposal to require all water and wastewater companies to have a PSR.

There is already a postcode lottery of the service that customers receive depending on the water supplier in their area, so it would be positive if this part at least is

standardised to enable everyone to have access to the support they need, regardless of their supplier.

4. Do you agree with our proposal to require all water and wastewater companies to refer to their PSR as a 'priority services register' or 'PSR'?

CAP agrees that using this standard wording is positive and will reduce confusion. This also helps national organisations to signpost vulnerable people who can sign up to the register under a consistent name. Clear communication is needed, however, to explain what the term means, to make it clear that the energy PSR is a separate register, and to emphasise that people will need to apply for that too.

5. Do you agree with our overall approach to setting our expectations in this area, through non-exhaustive lists of needs and services we expect PSRs to cover?

CAP acknowledges the need to recognise that it is a non-exhaustive list as there may be a range of less common, but personally significant, factors that may not be listed. However, it would be positive for Ofwat to make it compulsory for companies to offer these categories on the lists of needs and services. Making these standard minimum support lists would allow national communication by Ofwat and advice providers to reassure people that, no matter their supplier, these are the minimum things they can expect.

CAP would also encourage Ofwat to speak to suppliers about the approaches they are currently taking. Water companies have recently submitted vulnerability strategies and within these there may be some good ideas and suggestions for inclusion within the PSR.

With the consideration of a potential joint approach to a PSR with the energy sector in the future, it would be positive to consider how these align with the list that forms the energy PSR.

6. Do you agree with the list of needs we have set out? Are there other needs we should include?

Categorising people based on their age, diagnosed disability etc... can be problematic as people can be affected in different ways. As a result, CAP would encourage Ofwat to take more of a proactive national approach to promoting the support that is available so people can hear and decide if the support is something they would benefit from, no matter the categorisation of 'need'.

CAP would also encourage Ofwat to consider the crossover of needs and the role that could be played in signposting between support networks. This should include signposting for social tariffs. With the link between financial vulnerabilities and other challenges, there should also be consideration of supportive language and the offers of further support if people are struggling.

7. Do you agree with the list of services we have set out? Are there other services we should include?

Ofwat can play a role in encouraging suppliers to engage with people to discuss the support services they need and to offer the option for people to speak with someone about the support that is available.

CAP would also recommend Ofwat encourage companies to make some of these standard practice such as accessible communication, as well as knocking and waiting, as these are things that would benefit everyone even if they do not technically fall in one of the needs categories.

8. Do you agree with our proposed requirement that all companies should strive towards having as comprehensive a picture as possible of PSR service requirements of individual customers in their area?

CAP agrees this would be positive.

CAP would also encourage Ofwat to explore going further to encourage and facilitate more of a joined-up approach for customers. By engaging with other essential service providers and councils Emergency Action Plans, then a joined-up

approach can be taken to make sure that those who have additional needs and requirements are catered for in times of emergencies.

9. Do you agree with our proposal to set an eligibility estimate, and require incumbent companies to grow their PSRs towards this each year?

This proposal will incentivise companies, but there needs to be consideration and recognition of the potential negatives this could bring. Being completely target-driven may result in people being added to a PSR who do not want to be, or companies choosing to build numbers quickly by targeting those who are 'easier' to engage with rather than those who have the most needs in this area. So alongside this requirement, there also needs to be an approach set by Ofwat that encourages companies to consider the PSR as a tool to help those who need it rather than simply a statistical target exercise.

10. Do you agree with our proposed eligibility estimate, and the method we have used to calculate it?

CAP agrees this seems reasonable.

11. Do you agree with our proposal to not expect new appointees to meet our eligibility estimate?

When there is a new appointee for smaller specific sites as set out in the consultation document, CAP would encourage targets to be set based on demographic data of inhabitants. CAP would encourage Ofwat to set a timescale for this to be completed and for PSR to be offered to ensure provision for those who are a priority can be facilitated if instances occur shortly after launch.

12. Do you agree with our proposal to retain our expectations on data checking from our 2020-25 common performance commitment?

CAP considers the 'attempted contact' data-checking criteria of 45% in year one and 90% in year two as set out in [2020-25 common performance commitment](#) as reasonable. However, CAP would encourage the 'actual contact' rates to be higher.

But with all data-checking exercises, CAP would strongly encourage that this is done in an approach that is framed as 'checking that the information is correct' rather than questioning if someone is still entitled. Although some data checking is needed to make sure the register is kept up to date, there should be an option given for people to confirm that this is a lifelong condition and to not be required to reconfirm their condition every few years. This is particularly important for people with lifelong disabilities or deteriorating illnesses where annual checks that they still require a PSR could be harmful communication.

13. Do you agree with our proposed standards on PSR registration?

If a single joined-up system is not established with the energy PSR, then there needs to at least be proactive signposting for the customers. This should include the option of data sharing with their energy supplier to save them having to fill their information in twice to ensure they also have access to their energy needs in times of supply issues.

14. Do you agree with our proposals for implementation, monitoring, and reviewing our PSR standards?

CAP would encourage continuous engagement with people on PSR to enable Ofwat to hear the positive and negative first hand experiences people are having.

CAP would also encourage Ofwat to take more of a proactive approach to communicating about PSR's and the support that is available.

With the consideration of a single PSR system being ongoing, it would be positive if Ofwat engaged with this conversation now rather than waiting for the next review. In this way, systems can be created to enable this to happen without having to recreate it all.

About Christians Against Poverty (CAP)

Christians Against Poverty (CAP UK) won't sit back and let poverty destroy lives. CAP is a UK-wide charity that equips local churches with the tools and expertise to support people facing debt and other financial challenges in their communities.

CAP Debt Help provides holistic support for families and individuals facing problem debt with a free face-to-face service – tackling both the financial challenge and the wider emotional impact. CAP tackles the causes and consequences of UK poverty through free community groups, also run through local churches.

CAP Money Management Courses give people the opportunity to learn skills that have a lasting impact on their finances.

CAP Job Clubs equip people experiencing unemployment with practical tools to enter employment, whilst also supporting them to rebuild their confidence and self-esteem.

CAP Life Skills groups offer a course designed to provide practical money-saving techniques and how to make money go further.

All CAP's services are free of charge and available to everyone, regardless of age, gender, faith and background.

Find out more about Christians Against Poverty at capuk.org

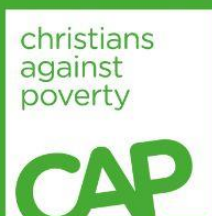


Official response to Ofwat's consultation on the Priority services registers

Requests for further information

This response has been written by _____ for Christians Against Poverty (CAP), with contributions from:

Please send requests for further information to:



capuk.org



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