

November 2024

Response to Ofwat's Priority Services Register (PSR) Consultation

Foreword

At IE Hub, our mission is to bring lenders and service providers together for the good of the customer, simplifying how individuals engage with their creditors and service providers. We are pleased to see Ofwat's efforts to improve Priority Services Register (PSR) standards and support the direction of the consultation. By streamlining how customer needs are captured and shared across multiple suppliers, Ofwat is taking meaningful steps to reduce the strain on vulnerable individuals.

Below, we outline our thoughts and suggestions in response to the consultation.

Key Areas of Alignment and Recommendations

Standardising PSR Terminology

Introducing a single term—Priority Services Register (PSR)—across the water sector is a logical, customer-focused step. Consistency in naming will make it easier for individuals to recognise and engage with the support available, removing any confusion caused by inconsistent terminology.

Enhancing Data Collection

The progress made in expanding PSR coverage since 2020 is encouraging, with registrations increasing from less than 2% of households to over 10% today. This aligns with our own data, which shows that over 50% of households using IE Hub declare additional support needs. Expanding PSRs further is critical, but this growth must be matched with a commitment to maintaining high-quality, personalised service.

By capturing more detailed information about customers' specific needs, water companies will be better equipped to prioritise support effectively during service disruptions. Including financial vulnerability as a mandatory field will ensure companies address challenges faced by customers experiencing events such as redundancy, divorce, or reduced financial resilience.

Simplifying Customer Engagement

We strongly welcome Ofwat's recognition of the role third parties, such as IE Hub, can play in capturing and sharing customer data. This approach reduces the burden on customers, who often face the stress of repeatedly disclosing their circumstances to multiple organisations. Enabling third parties to gather and update PSR data ensures more streamlined and accurate support, while minimising unnecessary contact from multiple companies.

Expanding the Scope of Support Services

The list of proposed PSR services provides a strong foundation, addressing key needs such as alternative water supplies, additional communication formats, and tailored support during emergencies. To further enhance this offering, we suggest:

- Allowing customers to choose their preferred communication channels, which would improve accessibility and response rates.
- Recognising financial vulnerability as a specific need, as customers with low financial resilience are likely to face significant challenges during supply interruptions.

Addressing these gaps would make PSRs more inclusive and responsive to the needs of a diverse customer base.

Balancing Growth and Service Quality

The proposed eligibility estimate, suggesting that up to 50% of households may qualify for PSR services, aligns with our experience working with vulnerable customers. While we support the push for wider PSR coverage, it is essential to ensure that growth is carefully managed to avoid compromising service standards. Effective data collection and coordination will be crucial to maintaining the trust and confidence of customers.

Registration and Data Management

We fully support Ofwat's focus on clear and efficient registration processes, including:

- Promptly adding customers to the PSR upon request.
- Providing clear confirmation and transparent communication about available support.

Maintaining accurate and up-to-date PSR records is another critical element of delivering high-quality support. Regular data checks, ideally every two years, must be meaningful and coordinated to avoid unnecessary duplication of contact. By enabling third parties to conduct these checks on behalf of multiple organisations, companies can further reduce the administrative burden on customers.

Conclusion

The proposed changes to PSR standards represent a positive and necessary step forward in supporting vulnerable households. By prioritising consistency, inclusivity, and streamlined engagement, Ofwat is paving the way for improved outcomes across the water sector. At IE Hub, we remain committed to working with water companies and other service providers to ensure these standards translate into tangible benefits for customers.