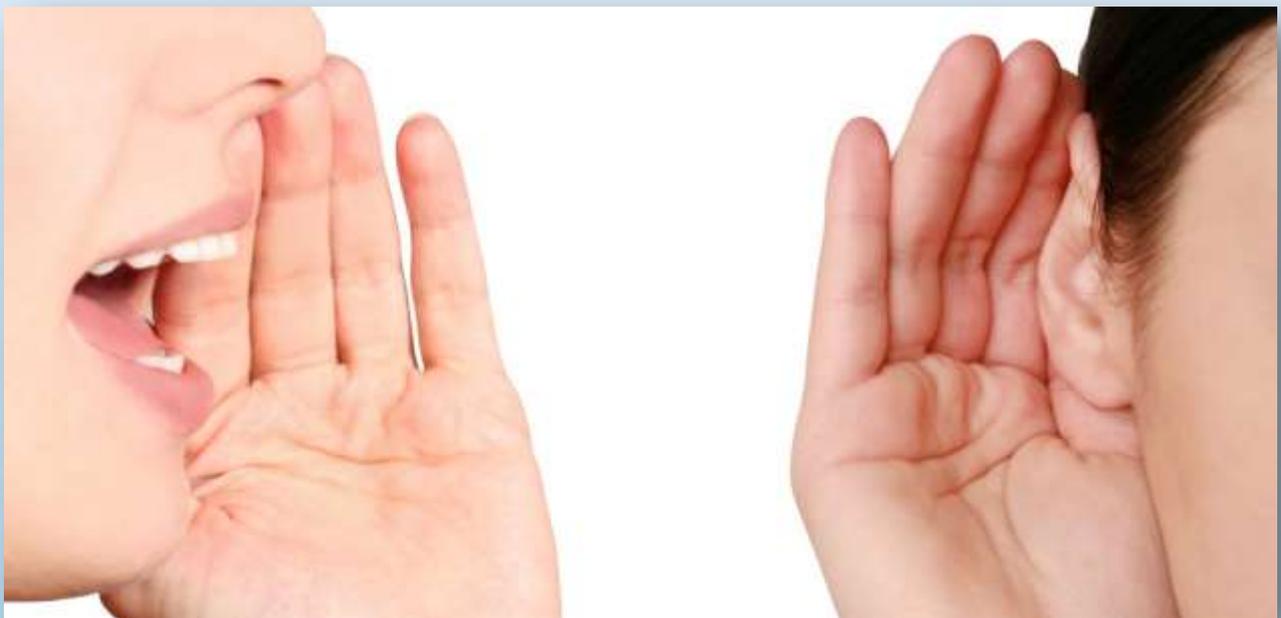




## Uncharted Waters: Phase 2

Non-household customers' expectations of competition in the water industry:  
Research with industry representatives



Accent

# CONTENTS

|  |    |
|--|----|
| Executive Summary.....                               | i  |
| 1. INTRODUCTION .....                                | 1  |
| 1.1 Background & Objectives .....                    | 1  |
| 2. METHODOLOGY.....                                  | 3  |
| 2.1 Introduction.....                                | 3  |
| 2.2 Topic Guide.....                                 | 3  |
| 2.3 Research Quality.....                            | 4  |
| 3. FINDINGS .....                                    | 5  |
| 3.1 Understanding the key issues for members.....    | 5  |
| 3.2 Initial views on Market Reform .....             | 9  |
| 3.3 Market design.....                               | 12 |
| 3.4 Key Pillars of Market Design.....                | 13 |
| 3.5 Market Blueprint .....                           | 13 |
| 3.6 Service Standards .....                          | 16 |
| 3.7 Contracts, Pricing and Consumer Protection ..... | 17 |
| 3.8 Market Failure .....                             | 18 |
| 3.9 Regulation.....                                  | 18 |
| 3.10 The Scottish and Welsh Markets.....             | 20 |
| 3.11 Switching .....                                 | 20 |
| 4. Key Findings.....                                 | 23 |
| Appendix A: Topic Guide                              |    |

## Executive Summary

### Introduction

The Government's vision in England is for all non-households, regardless of how much water they use, to be able to choose who provides their retail water and sewerage services. The "Open Water" programme was created to design and deliver the market structure to support this, to be put into operation from April 2017.

In recognition of the need to engage with all business sizes, in 2013 The Consumer Council for Water (CCWater) commissioned Accent to undertake research to understand a diverse range of business customers' views and needs. The first phase of this research (published as 'Uncharted Waters' by CCWater) was a qualitative study of a diverse range of non household water customers – from micro businesses to large corporates. This second report which we have called Phase 2, builds on the findings from Uncharted Waters and brings together the views of a small number of stakeholder representative groups to provide supplementary evidence on what the business customers they represent expect from the market design.

### Methodology

This report is based on the findings from five face to face depth interviews with stakeholder representative groups. The interviews lasted approximately 90 minutes each.

### Key Findings

#### Current Situation

- Representatives report the current baseline satisfaction amongst their members with their incumbent water supplier as being broadly okay
- There are, however, a considerable number of issues which representatives believe require improvement and resolution:
  - Billing
  - Customer service
  - Leakage management
- Issues with communications with water and sewerage suppliers make it difficult for non-household customers to know who to go to within the organisation for resolution or advice on specific issues
- Representatives feel that problems with billing and the inability to receive accurate, timely bills in a usable format is a real barrier to assessing water usage and targeting reduction strategies
- Problems with, and the associated costs of installing meters that allow automated readings are also a cause for frustration in enabling businesses to monitor their consumption
- It is not clear to Developers whether variations in the frequency of charging and the level of charges from different water suppliers for network re-enforcement are being driven by different interpretations of guidance or network capacity

- There is a call from some representative bodies for water suppliers to be more proactive in advising on water efficiency and installing smart meters.

## **Water Market Reform**

### **Awareness and communication**

- All representatives are aware of the forthcoming market reform although there is a concern that this knowledge has come from peers/colleagues rather than a targeted communication campaign from Government or the water industry
- Whilst most representatives struggled to initially articulate the benefits of an open market after further probing all were able to mention a number of potential benefits (and these mirror those stated by non-households in the first 'Uncharted Waters' research). There are concerns around de-bundling of services, particularly splitting water supply from billing and metering
- An on-going communication campaign was called for – targeted at both the representative organisations and their members. Representatives call for information to help them provide their members with accurate and timely information about the changes in the non-household market.

### **Market design**

- The market design needs to take into account lessons learnt from other deregulated sectors, such as energy and telecoms where small companies struggle to negotiate the best deals and larger businesses need specialist procurement teams (which are already in place to support the wider business and are also experienced in negotiating with suppliers from other deregulated sectors)
- There is general agreement from representatives of the key pillars<sup>1</sup> of market design identified in phase 1 of this 'Uncharted Waters' research
- As with the first phase of this 'Uncharted Waters' research, representatives are somewhat sceptical that their members will actually switch water suppliers.

### **Contracts**

- As with the first phase of 'Uncharted Waters' research, there is strong opposition of auto rollovers of contracts and hidden charges. There is a call for clear exit clauses, notice periods and transparent costs
- Contracts for smaller companies are expected to be simple to understand and easy to compare for non experts
- The proposed default contract was also felt to be broadly acceptable although representatives recognise the need for their larger members to be able to negotiate bespoke contracts (although these are seen to be the minority of members).

---

<sup>1</sup> Transparency, fairness, simplicity and flexibility

### **Customer protections**

- In the event of a water retailer failure, representatives believe their members should default to the 'incumbent' water supplier without any interruption to supply (and with no financial disbenefit to the customer). This view is consistent with that expressed in the first phase of the 'Uncharted Waters' research
- The Guaranteed Service Standards are felt to be broadly acceptable although representatives had some concerns about how retail and wholesale service standards would fit together for the end customer benefit.

### **Developers**

- Across the research, there are a number of concerns that specifically relate to Developers. It is felt that, due to the unique nature of their operations, they have a number of unique requirements, relating to planning, timings and accountability that are not being met by the current market structure and proposed market reform is seen as exacerbating rather than improving the situation.

# 1. INTRODUCTION

## 1.1 Background & Objectives

There have been significant changes to the competitive landscape in the water industry for larger business customers over the last 10 years. Competition for around 2,200 large business users in England and Wales (those businesses consuming more than 50 mega litres<sup>2</sup> of water per annum) was introduced in 2003. In England, this consumption threshold was subsequently reduced to 5 mega litres in 2011 allowing 27,000 more business customers to choose the supplier that provides their water and sewerage retail services such as billing, meter reading and customer service. The supplier that provides their wholesale services (infrastructure, water supply) remained the same.

The Government's vision in England is for all non-households, regardless of how much water they use, to be able to choose who provides their retail water and sewerage services. The 'Open Water' programme was created to design and deliver the market structure to support this, and to be put into operation from April 2017<sup>3</sup>.

When the first phase of 'Uncharted Waters' was commissioned in 2013, the design of the market was based around input solely from 'large' business users. However, the Consumer Council for Water (CCWater) believes that in order to create a market design that accommodates all business types, sizes and needs, it is critical to understand the diverse needs of the entire business community including small and micro business customers. In recognition of the need to engage with all business sizes, CCWater commissioned Accent to undertake research to understand a diverse range of business customers' views and needs. The findings of the first phase of the research are being used in discussions with policy makers to shape the scope of the retail market and to provide evidence for policy development. Within this, the research needed to:

- Capture any downside of extending the competitive arrangements;
- Understand how to maximise market participation; and
- Explore the optimum market design.

The first phase of this research (published as 'Uncharted Waters' by CCWater<sup>4</sup>) was a qualitative study of a diverse range of non household water customers – from micro businesses to large corporates. This second report builds on the findings from Uncharted Waters and brings together the views of a small number of stakeholder representative groups to provide supplementary evidence on what the business customers they represent expect from the market design.

---

<sup>2</sup> Mega litre = 1million litres

<sup>3</sup> From May 2015 Open Water passed joint responsibility for the opening of the retail water market to Ofwat and Market Operator Systems Ltd (MOSL)

<sup>4</sup><http://www.ccwater.org.uk/wp-content/uploads/2014/06/Uncharted-Waters-Non-household-customers-expectations-for-competition-in-the-water-industry1.pdf>

In this second phase of the research, a total of five depth interviews were undertaken with representatives of stakeholder representative groups who provided views on the opening of the water market and the implications for their members.

## **2. METHODOLOGY**

### **2.1 Introduction**

This report is based on the findings from five face to face depth interviews, which were undertaken with the following stakeholder representative groups:

- British Retail Consortium
- Home Builders Federation
- Packaging Federation
- Agricultural Industries Confederation
- Federation of Small Businesses

The depth interviews lasted approximately 90 minutes each.

The findings from the depth interviews are anonymised in this report for all stakeholder representative groups apart from the Home Builders Federation as there are some areas of specific feedback that relate to the housing developers and it is not possible to report this without providing the context and therefore revealing the source. We have referred to them as 'Developers' throughout this report and the Home Builders Federation have agreed for their views to be highlighted in this way.

### **2.2 Topic Guide**

The topic guide, which informed how we conducted our interviews covered the following issues:

- Stake in the ground:
  - Understanding key issues for members
- Initial views on market reform: awareness and responses (positive and negative) to the intended changes
- Thoughts on an effective market design that is responsive to members' needs:
  - Learning from other markets and previous experience in switching service providers
  - Exploring what motivates a switch
  - Perceived benefits and concerns
  - Response to key pillars for market design as developed from previous research
- Thoughts on market scope and service offering
  - Thoughts on the Scottish example as a 'reformed' market
  - Thoughts on separate provision of the water and sewerage services
  - Information requirements in decision making regarding switching
  - Scenarios alternative to switching – negotiate or do nothing
  - Views on Wales being excluded from market reform
- Details of market design:
  - Communicating the reform: preferences on the source, form and timing of information received
  - Expectations and preferences regarding the switching process: lessons from other markets, reactions to two provided switch route options

- Contract flexibility (standard vs. bespoke) and consumer protection
- Service levels

The full topic guide can be viewed in Appendix A.

### **2.3 Research Quality**

This research has been undertaken in line with the guidelines set out by the market research quality standard ISO 20252:2012.

### 3. FINDINGS

#### 3.1 Understanding the key issues for members

##### Levels of Service

Stakeholder representative groups describe their members' relationship with water suppliers as neutral to okay<sup>5</sup>. However, if problems do arise with water and sewerage services, issues can develop where communication with the water suppliers becomes problematic.

For example, one member wanted a drainage charge reassessed and to do so, they had to get consultants involved. However, trying to progress the issue or find the right person to speak to at their water company was difficult and time consuming.

Another example is where a member wished to discuss the potential for water recycling at their premises but could not make contact with anyone within their water supplier who was able to assist. They resorted to using an external consultant which resulted in additional and unexpected costs when the member really felt that the water supplier should be able to provide this type of service.

Representatives also feel water suppliers should focus on reducing waste caused by leakage. Their members have corporate, social responsibility plans with a commitment to reducing waste and feel suppliers should also be responsible in this way.

There is a belief that water suppliers are more focussed on generating profits than on customer needs.

These views tie in with those observed from the business participants in the first phase of Uncharted Waters research where a considerable number of retail-related issues emerged. There is a belief that the current lack of competition has fuelled complacency in the water sector.

Developers sense that they are not seen as customers but more of an imposition for water and sewerage suppliers. Even the best water and sewerage suppliers are not felt to be as proactive or responsive to their needs as they could be. Developers have concerns over delays in applications for new water and sewerage connections, wholesale service levels and costs which underpin the perception that water and sewerage companies are not focused on their needs.

Developers' concerns with levels of service relate primarily to the wholesale part of the market. Delays in applications that hold up overall developments are a key issue.

*"You have all the parts and you need to know how long these things will take. I mean a case I'm dealing with now, made an application for water main in October 2014 and still has not heard anything." [Interview conducted in early 2015]*

---

<sup>5</sup> On a rating scale of 1 to 10 representatives would score current relations around 5

One example of good water and sewerage supplier practice was cited with the Anglian Water Developer account where a 'DART<sup>6</sup> account' was provided to enable a streamlined accounting and payment process. This was seen as making business sense as it cuts administration.

### **Billing/Cost**

Billing/cost is highlighted as a key issue by representatives. Sometimes bills are incorrect, and the issues with communication with water and sewerage suppliers make it difficult to know who to go to, to resolve it.

Where meters that allow for automated readings cannot be fitted, representatives state that their members use their water bills to interrogate their water consumption and detect leaks. However, bills may be generated up to one year apart, which makes bill validation and leak identification very difficult. Additionally, current billing regimes can be very different across water suppliers making this a difficult and expensive administration process. Representatives suggested that the streamlining of billing could be a benefit of a single water supplier and one potential benefit of market reform.

This is a current problem, and potential benefit of market reform, identified by the business participants in the first Uncharted Waters research where there were concerns around a lack of bill consolidation for multi sites or multi meters.

*"It takes take time for a team to go through and validate all the bills and it's just a huge additional administrative burden"*

*"You can automate meter readings at your preparation site and you can charge accurately on those parts but without that level of granularity then you're in a grey area"*

Billing is currently seen to be a real barrier to assessing water usage and targeting reduction strategies across non-household customers' portfolios. There's a sense of inconsistency in billing quality, charging structures and regimes between different water and sewerage suppliers. Many members deal with a number of different water and sewerage suppliers. The observation is that billing cycles are inconsistent across the market and charges vary depending where in the country sites are located (with no explanation of why this is the case when it doesn't happen for other utilities). Additionally, some water/sewerage suppliers are able to provide detail on bills which is not available from another supplier.

An example of a water and sewerage supplier introducing unexpected charges is when a member of the stakeholder representative groups who runs a group of relatively small businesses was charged an additional £60,000 by their water company for

---

<sup>6</sup> Developer Account Recharge Tracker (DART) is an Anglian Water Business credit facility provided to large housing developers. It provides a way to manage the financial administration of developments. It enables developers to raise and complete jobs on an account and a monthly statement will be issued in arrears for payment

exceeding a certain consumption threshold. Whilst there was some understanding that this charge could be legitimate, the fact that the water and sewerage supplier had never charged for this before and subsequently decided to charge without forewarning has caused considerable accounting problems for the member involved.

*“Suddenly getting a £60k charge and having to go to the board for a completely unsighted cost – something not provisioned for”*

There is perceived diversity in the interpretation of legislation and guidance over costing structures where representatives feel that members have experienced difficulties in having problems resolved by the regulator and water suppliers not adhering in a consistent way to resolving differences or disputes with customers.

*“Yes, the regulator is involved but refuses to make any decision on it”*

Additionally, there is a perception of systemic billing errors leading to overcharging which is proven by the magnitude of back charges which come to light when cases are challenged. Developers report a perceived inconsistency across the market where some water and sewerage companies state that there is no capacity in sewer network, forcing Developers to pay considerable sums for network reinforcement whereas, with other water suppliers, there are rarely any queries. The perception, therefore, is that some water suppliers charge on more occasions than others. It is recognised that this may be a communication issue in that availability may well vary by area but without transparency Developers are unable to assess whether the charges are valid or not. This may also be due to a difference as to how suppliers interpret guidance on how and when they can charge or when the network is perceived to be at capacity. The conclusion is that it is not clear to Developers whether variations in the frequency of charging and the level of charges from different water suppliers for network reinforcement are being driven by different interpretations of guidance or actual network capacity.

This inconsistency leads to differences in infrastructure charges and a strong perception across Developers that water and sewerage suppliers are double accounting for charges and requisition costs. For instance, requisition costs for a sewer where Developers are told that network reinforcement is required and also have to pay infrastructure charges.

For businesses/developers with multi sites the inconsistency in charging across different water and sewerage suppliers causes confusion and there is a sense that these are difficult to unpick on the bill. There is also uncertainty about how this will manifest in a competitive market and whether suppliers will increase their charges.

## Measuring water usage and meter installation

There is currently a perceived difficulty with measuring water usage which stems from problems with installation of meters that allow for automated readings<sup>7</sup>. Where it is not possible or cost prohibitive to install them, it's difficult for business customers to accurately monitor consumption and leakage. Automated meters are perceived to be a big investment compared to the small amount of water actually used. For multi site businesses it can be cost prohibitive and whilst they acknowledge that automated meter readings allow regular monitoring it is not always deemed to be affordable.

*“Getting every player around the table is pretty impossible. It can take 5 years to get one in and be really expensive”*

*“It's about who is going to pay for digging up the road and you can go around in circles for years and years”*

There is a suggestion that all businesses can benefit from using water efficiently. Competition should motivate water suppliers to deliver a better service – including water efficiency advice.

An example of a voluntary industry initiative is one launched in 2008 where the retail sectors set themselves a series of collective environmental targets<sup>8</sup>. Water efficiency and measurement of water usage is one of these. When the programme started, only 50% of water usage of business customers was measured and this is now up to the mid 80%. The next set of targets is for 100% measurement in 2020 but this is felt to be difficult to achieve given that some suppliers are unable to fit meters in all premises.

## Infrastructure Management

Infrastructure management is referenced in relation to the issues with meter installation. Different parts of the supply chain are felt to operate in silos which cause problems with costs and agreement of works. There are concerns about the current water ownership model. For example, a business can arrange the installation of a meter with one department of the water supplier. Installation is then sometimes carried by a contractor or department area of the water company business with little communication between the installer and order taker. This is particularly problematic for multi site businesses operating across different supplier areas where different costs and processes are in operation. Whilst this could be perceived as a communication issue around meter installation arrangements, the view of representatives is that the end result is a perception of multiple organisations involved in what should be a simple process and that this will inevitably lead to problems with costs, including over charging.

---

<sup>7</sup> Respondents expect to pay for the provision and installation of water meters which allow for automatic meter readings themselves, as opposed to conventional water meters which most companies fit free of charge subject to the degree of pipework alterations that may be required

<sup>8</sup> 'Better Retailing Climate'.

There is a hope but also uncertainty that ownership may be addressed by market reform. For example, representatives would like to see a transparent 'journey map' for installations which simply explains the parties and processes involved. This should be consistent across the geographic market so that the process is the same irrespective of supplier. This could form part of the market reform requirements.

### **3.2 Initial views on Market Reform**

All representatives were aware of market reform although experiences and knowledge were varied. For example some members had relatively little awareness of the detail of market reform. For most, this knowledge has come from other industry colleagues rather than any official government communication.

However, there is a degree of concern that Developers have not been advised or consulted about market reform.

*"We have not been represented at Open Water. We are the biggest national Developer and no-one has talked to us. Would you not have thought it would be advantageous to have Home Builders Federation present from day one?"*

Developer representatives attended a meeting in February 2014 about charging rules and were asked if they would be responding to the Blueprint<sup>9</sup>, which hadn't been shared up to that point. Prior to this, there was a general awareness that the market was becoming competitive for business customers but not necessarily Developers.

There is a sense that most members (irrespective of industry) will not be aware of the proposals.

One representative could not initially highlight many positives of a competitive water market, whilst he did not think the idea was a good or bad one they none the less struggled to articulate any particular benefits. However, on reflection they hoped that increased competition would force water suppliers to become more customer focussed. It is a chance for water and sewerage suppliers to become more customer orientated, for instance, having the right point of contact and someone addressing issues rather than being 'fobbed off'.

There is a need for clarity of billing and a well developed information campaign. Theoretically competition should also result in cheaper bills for members. However there are concerns that this could be used to put prices up, for instance, for putting infrastructure in.

Business customers will continue to focus on their core 'business as usual' activities until there is a problem. There is no great enthusiasm or excitement for competition.

---

<sup>9</sup> The Blueprint was an Open Water consultation that later formed the basis of the water industry's Market Architecture Plan.

Reassurance is needed primarily around 'excessive de-bundling of services', particularly the splitting of water supply from metering and billing. There are concerns over responsibility for repairs of water supply pipes and whether repairs will now take longer. Therefore, there is a need to have specific and very clear lines of responsibility, which all comes back to having a single point of contact to resolve issues.

One representative did welcome the Water Bill and, whilst they shared some of the concerns of other stakeholder representative groups, were able to cite some advantages of retail competition, these included:

- Bulk purchasing power of multi sites which should drive better deals;
- One supplier for multi sites which should aid consistency of pricing;
- Reduction/balancing of pricing through increased competition;
- Simplification and increased frequency of billing;
- Customer-focused water and sewerage suppliers resulting in installation of automated meter readers;
- Better services offered to allow better water efficiency e.g. rain water harvesting;
- More innovation in charges, tariffs and contract options;
- Transparency of costing; and
- Community aggregation models which could really benefit small business communities.

Some of these benefits were mentioned by business participants in the first Uncharted Waters research. The broad benefits were seen to be: increased customer choices, control and leverage, companies working harder to win business, and water companies being placed under more pressure to perform. For an individual business, all cited the benefits of lower costs and reduced usage. For high spend/high water users and multi-sites additional benefits were seen to be the provision of an enhanced service offer via a dedicated Account Manager; more efficient billing; e-Billing and the use of smart meters. There is also the promise of heightened Corporate Social Responsibility achieved through the implementation of water efficiency and recycling measures and green tariffs and the simplicity of integrated billing.

Ideally, representatives would like to see automated meter reading technology facilitated as a result of the opening of the water market. Representatives felt that opening a competitive marketplace would enable members to do more to measure their water consumption if water and sewerage companies contributed to the automated meter reading installation cost.

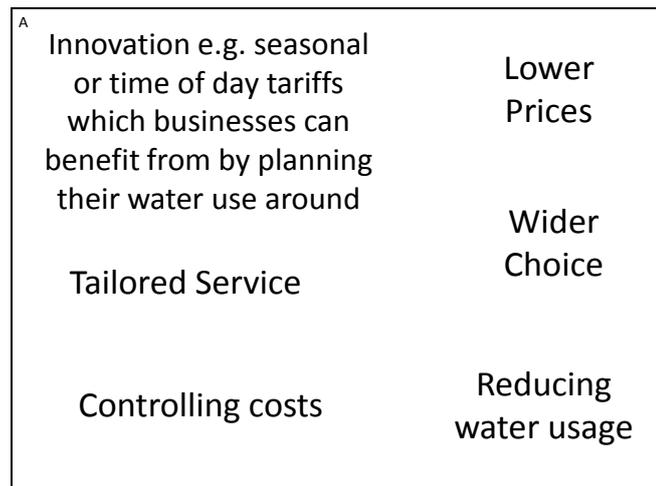
Metered properties also present better opportunities for smarter charges and innovative tariffs which would be welcomed. If multi site members selected one company and one bill, they could bring in-house any bill validation services that they are currently outsourcing. Metering could lead the way to add-on services offered by the water retailer at a much more competitive rate and it would address billing inconsistencies.

*“If you have that amount of purchasing power behind you then it will no longer just be about water and sewerage”*

When shown Showcard A (Figure 1 below), other stakeholder representative groups suggested positives brought by the opening of the market may also include:

- Lower prices;
- Tailored service; and
- Wider choice (in theory), although there is scepticism around this. Having seen competition in other markets there is a degree of doubt that opening up markets always leads to greater product choice. There is an acceptance that there is likely to be greater supplier choice but some scepticism that this will automatically lead to greater service choice.

**Figure 1: Showcard A**



There's an initial desire for members to be able to return to their default water service supplier should there be a problem, without any interruption to supply. This latter point is particularly important for those members who rely on a consistent water supply. All members want reassurance that things will only improve and certainly not deteriorate. They actually want clarity on the rules and responsibilities i.e. who to speak to and a guarantee that that person will progress the matter.

One stakeholder representative group is keen to ensure that members are provided with a competitive and transparent water market which drives innovation, customer service and cost saving.

Developers are more concerned than other stakeholder representatives about the potential changes to the market and have fundamental concerns that the new model will lead to Developers incurring greater costs and being subjected to greater delays.

One representative stated that having one supplier would offer their members simplicity with a single point of contact, but again interest would only be there if there was a cost saving. They specified absolutely no interest in different water retailers (i.e. the company that will provide services such as billing, meter readings and customer

service) for different meters, suggesting this would only complicate things. As the rules surrounding competition in Wales are different to those in England, companies on the Borders would be irritated purely because of the lack of choice.

Representatives observed that it is easier to imagine switching in the electricity market where it doesn't matter who supplies the service. However, with water supply there are views that members misunderstand how the market is structured, with observations such as 'how can that water coming from my pipe be supplied from a supplier far away'.

### **3.3 Market design**

The design of the water market needs to take into consideration lessons learnt from other sectors. For example the deregulation of the gas and electricity markets is seen to have led to a complex and fragmented market where small businesses struggle to negotiate best deals and larger businesses need specialist procurement teams to get the best and most appropriate terms.

There is strong opposition to hidden charges and auto-rollover of contracts, and support for clear exit clauses, notice periods and transparent costs. Differential contract terms based on credit risk assessments should be explained and transparent. However, there is some acceptance that rollover contracts would be acceptable to a minority of members provided communication is clear to ensure that businesses do not get caught out and locked in when there are price changes.

Representatives acknowledge CCWater's previous 'Uncharted Waters' research showing that different customers have different needs. In the event that a customer requires additional services (including new connections) contracts should be clear to the extent that the consumer is able to use alternative companies to make the connections. Contracts must also reference the costs and services associated with billing, data, and metering.

There is a view that members would welcome a market that encourages and entices new water retailers into the water market to avoid a cartel situation. For their larger members it is expected that they will secure longer term contracts (two to three years) rather than switch water and sewerage companies on an annual basis.

*"If I think about the energy market, I can't think of a single [small] company that has switched in the last, I can't remember how long"*

Contracts for smaller companies are expected to be simple to understand and easy to compare for non experts and in line with the output from the main stage of CCWater's 'Uncharted Waters' research, where low spend customers expressed a desire for standardised contracts due to lack of time and low usage.

One representative believes that small businesses, and in particular micro businesses and sole traders, should be treated as household consumers in terms of

communication and tariffs, but should be eligible to switch water retailer should they wish. The majority are small users, which often show the same traits as household customers with respect to levels of resource, finances, expertise and time constraints. For these businesses, guidance on switching should be publically available, widely promoted and managed independently.

### 3.4 Key Pillars of Market Design

There is general agreement with the key pillars of market design, which came out of the first stage of research where respondents consistently and spontaneously mentioned:

1. **Transparency:** seeing the basis of cost structures, contracts with no hidden clauses etc. Without this, the rest of the pillars cannot be determined
2. **Simplicity:** clear tariffs, so that business customers can understand what they are getting. A clear line of responsibility is required with a single point of contact.
3. **Fairness:** offering the best deal, best price and that comes back to not paying for the infrastructure. It should not be used as means to put prices up and all should pay the same.
4. **Flexibility:** offering businesses a range of services and options. Some may wish to negotiate bespoke contracts and pricing whilst other members may wish to have a standard contract.

In addition to the existing pillars, one member requested that innovation and responsiveness be added. This relates specifically to responding to customer needs and building for the future. The speed of switching will also be critical to success in the market place and this should be designed to be as quick as possible. Furthermore, there is a requirement that the tariff structure and range of tariffs is simple and straightforward vs. the situation that has evolved in the energy market which is felt to be complicated and confusing.

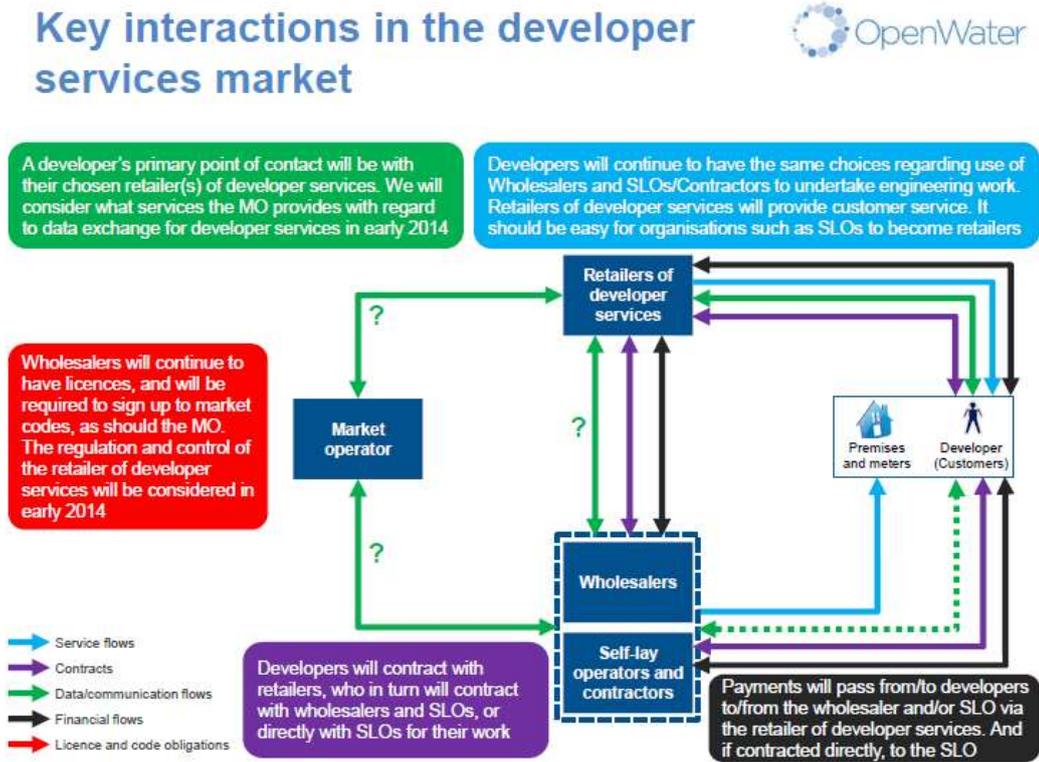
Whilst Developers felt that the pillars for market design are right for the generality of business customers, specific consideration still needs to be given to Developers to ensure the market design addresses their key concerns around the way water companies work with Developers. Ideally the market would work so that Developers are able to deal with suppliers in an efficient way in order to deliver on service, cost and regulation expectations. There are fundamental concerns that the new model will lead to Developers incurring greater costs and being subjected to delays.

### 3.5 Market Blueprint

It is understood that competition for non household customers could be advantageous via universal billing for multi site premises, value added services, leakage reduction, metering programmes, cost reduction, etc.

However, Developers are highly critical of the market blueprint (see Figure 2).

Figure 2: Market Blueprint



The following summary is taken from the Home Builders Federation's official response to Open Water:

*"Our key areas of concern are a reduction in efficiency and customer service due to the following high-level consequences:*

- *Loss of direct contact with water and sewerage companies*
- *Duplicated administration structures and hence increased costs*
- *Loss of current integrated delivery and project management model*
- *Reduction in true competition as there will be competition on the surface but little true expansion in actual choice as asset delivery competition will be further removed from the customer*
- *Increased number of excuse driven enquiry re-directions; in management terms authority without responsibility with customer service being compromised."*

Developers do not feel confident that a market structure with water retailers as an intermediary would work effectively for them. Focus for Developers is on existing infrastructure which is the responsibility of the water wholesaler (as opposed to the water retailer who is responsible for billing and customer services). For Developers, the water retailers are an unnecessary third party in the supply chain and there is a strong sense that this additional layer will increase delays and costs. The idea of getting information for developments via a water retailer is rejected as cumbersome and there are concerns over who will regulate the water retailers.

When challenged, Developers have no sense that a water retailer might have the power to get information from the wholesaler more quickly than at present, be efficient at providing Developer information or that a water retailer may be able to smooth over any problems or application challenges.

*“What can they bring to the market that’s any different from today?”*

The new model feels more restrictive for Developers, cutting off their communication with the key player.

*“You are trying to make it more complex than it needs to be and introduce more cost and time delays”*

*“I mean, if we make an application to the [water] retailer, then they give it to the wholesaler, then they give it back to the [water] retailer, and then they give it back to us...am I missing something here”*

A conclusion is that developers have a desire to be treated differently to other non-household customers due to their unique requirements. In order to carry out their business activities efficiently they need to be able to liaise directly with the wholesaler rather than via a retail intermediary.

The role of the Self Lay Operator (SLO) is to enable a contractor to be responsible for putting water mains on site. This part of the market is already felt to be competitive as there is a choice between the SLO contractor and incumbent water company and there is little perceived need to increase competition in this area.

*“We get an allowance wholesaler/asset payment and get a direct-attached storage connection – we go out to a number of SLOs and we make a choice for incumbent or SLO to do it and do it on their price”*

In some respects, having several water retailers competing for intermediary work is no different from some companies who are set up now as ‘quasi retailers’. For instance, there are specialist third party intermediaries such as:

- Service consultancies - who act in this manner for a number of the Developers they work for; and
- Some SLOs, which are doing the registration process and obtaining information.

It is felt that a better opportunity for addressing Developers’ concerns is to tighten up the regulatory framework that surrounds the wholesaler part of the market.

*“What you need is something that works around the existing regime and more rigour around it”*

### 3.6 Service Standards

Clear communication will be essential, with a navigating hierarchy for non-standard requests and actions. There is expectation from members that there would be one point of contact within the water supplier (especially noted by larger business members) for any issues. That is a major concern already and will become especially important if there is to be decoupling or unbundling which could present non household customers with major issues in terms of who is responsible for the different elements of service delivery.

Requests made for guaranteed standards of service to ensure that '20 days is 20 days' are welcomed. Using the energy market as a model is felt to be appropriate given that there has been a noticeable shift in the attitude of energy companies since the introduction of guaranteed standards. Enforcement of the service standards through penalties or by publishing poor performance is requested.

*"Water companies live in fear of being bottom of the tree"*

*'We don't want to use it as a revenue generator but think it could change behaviour'*

Terms specified in the Guaranteed Service Standards (see Figure 4) were shown to participants:

**Figure 4: Guaranteed Service Standards**

|   |
|---|
| H   |
| <b>GUARANTEED SERVICE STANDARDS</b>   |
| <i>Retail services (These standards currently apply to the regional water company, but similar could apply to retailers in the water market)</i>  |
| Making and keeping written/telephone appointments<br>Offer an a.m./p.m. slot/ times 2 hour appointment slot if requested<br>24 hours notice of cancellation<br>Keep all non-cancelled appointments<br>Respond to a written query about the bill within 5 working days<br>Respond to other written correspondence within 10 working days<br>Respond to a written request to change method of payment within 5 working days, if unable to meet the request for this<br>Respond to written complaints within 10 working days |
| <i>Wholesale services (regional wholesaler still responsible, these and others relating to supply would still apply)</i>  |
| At least 2 days notice in advance of planned work which will interrupt your water supply for more than 4 hours, and notification of the timings<br>You may be entitled to compensation of the supply is not restored by the time stated and for each further 24 hours without water   |

Whilst these seem broadly acceptable, there were concerns about how water retail and wholesale service standards would fit together for the end customer benefit. In addition there were some specific additions requested:

- Dealing with faults/failures/repairs; and
- Resolution of complaints/service failures.

For water dependent businesses, two days notice in advance of planned work is not long enough and at least a week would be better.

One representative was aware that service levels do exist but not of the exact detail of them. Members will expect consistency of service levels/standards irrespective of where they are in the UK.

### **3.7 Contracts, Pricing and Consumer Protection**

Having looked at the proposed contract (Appendix B), organisations believe it is broadly acceptable for both small and large companies although there may be a need for some of the largest members to negotiate bespoke contracts – but these are thought to be a minority group.

*“Levels of wholesale service is the most critical thing – Retailer guidelines won’t matter unless this is addressed”*

For Developers, the contracts focus around Wholesaler services vs. new water Retailer responsibilities. It is felt to be difficult to see how contracts will work in the new market place as the most important contracts that Developers want is with Wholesalers to ensure that the work is done in a timely and cost effective manner.

Other representatives shared this view and stated that whilst service levels are important, these are all irrelevant if the Wholesaler has no clear service guidelines because businesses will be affected by the same problems that are currently rife in the sector, for instance, delays to applications for meters, slow registration for automated meter installations and slow at getting information through.

There was support for the Secretary of State to issue charging guidance (which has since been published for consultation<sup>10</sup>), with a belief that it is important to set down clear guidance on what is and isn’t acceptable, with an assumption that charges will be no higher than they are now. Competition will only be effective if there is greater transparency in fixed and variable charges for areas such as surface water drainage, connections for potable water, etc. In particular, one member stated the Government must introduce charging guidance on water recycling and reuse which is done in other countries such as Australia and USA.

One representative suggested Ofwat must provide guidance on the extent to which a water retailer must price their services based on actual costs. This guidance must take into account the potential for anticompetitive cross-subsidising between potable water, sewerage, surface water treatment and trade effluent costs.

---

<sup>10</sup> <https://consult.defra.gov.uk/water/water-industry-charging-guidance-to-ofwat>

There is also a need for protection against price de-averaging which could disadvantage small businesses that are located in more rural areas, or areas where costs of providing a service could be higher. This could incentivise new entrants to "cherry pick" low cost customers. However, it's recognised that the Government has provided assurances and that Ofwat has been tasked with ensuring this does not happen. This is an issue that members will continue to monitor along with CCWater.

### **3.8 Market Failure**

All stakeholder representative groups called for clear provisions to be in place should a water retailer leave the market. Water dependent businesses are in particular need of assurances that water supply will not be affected. There needs to be assurance that business won't be left without service supply if the water retailer can't or won't supply any more. There needs to be continuity of supply.

The expectation is that businesses will default to the incumbent retailer with the options of transferring their contract conditions they had in place with the failed retailer or being freed from the contract but also at liberty to seek a new water retailer immediately.

However, the terms that businesses are given by the incumbent must not allow the incumbent to charge a higher tariff than is offered to their existing customers (the Principle of Equivalence). This is a view reported in the first 'Uncharted Waters' research, where moving to a default tariff with a regional provider is viewed as a straightforward approach. However, it must allow freedom to move at any time in search of a better deal, with no binding contract in place.

There were also concerns that if the cost of the default tariff is considerably higher than the current tariff then the customer is being penalised for something that is not their fault.

One representative welcomed the late amendment to the Water Bill that allowed incumbent suppliers to exit the retail market, arguing that the alternative would create a false market where customers of those suppliers who wish to exit could be subject to poor levels of customer service and not enjoy the cost efficiencies of competition. There are clearly risks to be managed when water companies do leave the market, including potential changes to customer terms and conditions, billing errors, and communication of (and reassurances about) new arrangements. However, they will continue to seek reassurances around customer engagement and safeguards during the switching process.

### **3.9 Regulation**

Developers believe that development represents a small proportion of OFWAT's regulatory remit and this leads to a feeling that OFWAT is less concerned about Developer issues.

*"OFWAT are conspicuous by their absence in the Developer world"*

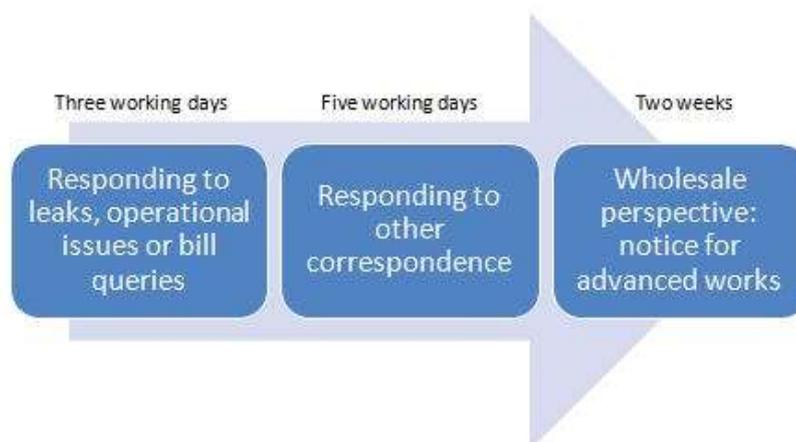
Whilst appropriate legislation is felt to be in place respondents felt that it is not enforced properly and Developers are left with no option but to go to judicial review and to the Competition and Markets Authority to deal with their concerns about delays in processes, unfair charges and outstanding determinations.

There is a perception that the regulators in other markets (OFGEM and OFCOM) are more proactive with a greater focus on new development and a better dialogue with Developer representatives.

One representative believes third party intermediaries can help the market to work more effectively by stimulating competition. However, experience from the energy market shows that in order for this to happen there needs to be pre-agreed definitions of the scope of services offered by third party intermediaries. All of these services must be regulated by an independent regulator. Regulation needs to be proportionate to risk and take account of the evolution of bundled utility services and the amount of commission paid by water companies to third party intermediaries and fees charged to consumers should be transparent.

Members feel it is difficult to comment on service standards as this is more of an operational issue. However, they highlight the need to include a standard for water retailers on emergency repair queries and issues. Retail service standards look broadly acceptable; however, they are not felt to sufficiently cover the wholesale responsibilities that the water retailers will have for ensuring that problems with the water supply or sewers/drains are addressed promptly. Figure 3 displays an example of an acceptable timeline for service standards.

**Figure 3: Service Standards Timeline Example**



Introduction of guaranteed service standards such as information within 14 days is suggested and further critical service factors are:

- Knowing if it is possible to connect to the network and the costs of achieving this;
- Whether there are any allowances provided for xxx; and
- The timescales for switching.

### 3.10 The Scottish and Welsh Markets

Representatives had some awareness that the Scottish market is open to competition already but little knowledge on how this was working. At the time of the research, there had been no feedback from their Scottish members on how it has panned out<sup>11</sup>.

One representative believes there are no real issues with the Welsh market being separate from England. However, they will require clear information about which postcodes are covered by reform and which services can be switched and if things in the borders are too complicated. It is felt that some of the affected retailers will use water management organisations and other advocacy groups to explore best possible options.

In addition to this, all representatives felt that the exclusion of Wales from the new arrangements may place additional time and cost burden on relevant members.

*“That’s why you should be looking at it and saying this won’t work. Look we would do what we can; we’re resilient enough but if the idea is to make it simpler and more customer friendly then it doesn’t feel right”*

One representative believes a cross-border Anglo-Scottish retail market would allow the market to operate more effectively and promote new entrants. However, because the market in Scotland is more mature and established, the regulations North and South of the border would need to be aligned and managed.

### 3.11 Switching

There are concerns across all stakeholder representative groups as to whether members will actually switch. Businesses need tariffs to be clear so they can make direct comparisons between water retailers and their focus is on where they can make saving. This depends on the relativity of the bill. In the grand scheme of things each business will need to look for their selves and determine the point at which the saving will tip the balance for them to switch.

One member believes guidance on switching should be publically available, widely promoted, and managed independently. Guidance on the data required to facilitate switching should be widely accessible including the site reference information (i.e. meter/site, post code, plot addresses, references) and meter reading arrangements. However, care clearly needs to be taken when sharing customer data. The switching process must be explained as part of the contract terms and should be closely monitored by an independent agency (such as Ofwat or CCWater), and any impediments identified should be escalated and changes made to the ‘code of practice’.

---

<sup>11</sup> Since the market opened in 2008 5% have changed their water supplier and 50% have renegotiated their water and sewerage costs. £110 million savings by 2020-2021 through lower bills, improved water efficiency, increased water audits, better leakage detection

There was comment that to ensure the market operates effectively members should be aware that companies are choosing to switch water retailer. One way of providing this information is for Ofwat to report annually on effectiveness of switching to ensure the process evolves as lessons are learned. Once again, this should be done through drawing on lessons in other regulated markets such as the energy market or the banking sector.

Monitoring of the benefits of switching should be independently collated and disseminated.

One representative stated the switching process needs to be simple, for example, like uSwitch for electricity. It will be massively cost driven and the process will consist of members going through a cost reduction exercise, which will determine that they need to look at water; members businesses might then go to a number of water retailers. There is no sense from members what they want from this other than simplicity and the need to be able to make direct price comparisons.

### **Learning about the market**

Representatives feel few of their members will be aware of the proposed changes in the water market. The key information that members will require are:

- Why is this happening?
- Who will own what in the market?
- How will it benefit me?
- What will it mean for me?
- What happens if I don't change – what will the price framework be?
- What sort of opportunities will there be for innovation?
- What are the issues in the borders?
- Who will be responsible for the infrastructure repair?
- What is the emergency communication process?
- Would community aggregation models be accepted?
- How will prices be managed?

The key information that **Developers** will need are:

- What will be the implications on Developer project timings?
- Whether there is an asset payment for water

Information will be supplied to businesses through their representative organisations' communications systems. Some will attend the CCWater regular business customer forum. They will feedback to members via website, newsletters, email etc. With regards to these different channels, some representative groups have technical

member committees and that reaches one level of membership. They also have key contacts at processing and other operational sites, and some have newsletters and forums at national or regional level.

One representative sees themselves as a key channel for communication but there is an expectation that water and sewerage companies and other industry companies (such as water management organisations and other advocacy groups) will lead the way.

OFWAT and CCWater are expected to provide factual and timely information about the changes and communicate how the market changes will lead to a more progressive water market framework. There is a requirement for members to be made aware of this information and for the focus to be on the smaller businesses as the large players will be contacted anyway. The communications should be escalated as the date for reform approaches. Channels will vary depending on business preferences but as a general rule representatives should be provided with all information to cascade to their members. Additionally, there was suggestion that information should be included as bill inserts.

With regards to timescales, some representatives are starting to inform all members now. They will follow this up with any changes in the process and will increase communications when they feel they need to. However, they are not seeing anything that requires action as yet. They would expect members themselves to act to determine what they should do and the company to provide information. This issue is not legislative, therefore there is a limit to the company's communication need.

## 4. KEY FINDINGS

### Current situation

- There is a consistency of findings from this phase 2 representative research and the 'Uncharted Waters phase 1' research
- Representatives report the current baseline satisfaction amongst their members with their incumbent water supplier as being broadly okay.
- There are, however, a considerable number of issues which representatives believe require improvement and resolution:
  - Billing
  - Customer service
  - Leakage management
- Issues with communications with water and sewerage suppliers make it difficult for non-household customers to know who to go to within their water supplier for resolution or specific advice
- Representatives feel that problems with billing and the inability to receive accurate bills in a usable format is a real barrier to assessing water usage and targeting reduction strategies
- Problems and the associated costs of installing meters that allow automated readings are also a cause for frustration in enabling businesses to monitor their consumption
- It is not clear to Developers whether variations in the frequency of charging and the level of charges from different water companies for network re-enforcement are being driven by different interpretations of guidance or network capacity
- There is a call from some representative bodies for water companies to be more proactive in advising on water efficiency and installing smart meters.

### Water Market Reform

#### Awareness and communication

- All representatives are aware of the forthcoming market reform although there is a concern that this knowledge has come from peers/colleagues rather than a targeting communication campaign from Government or the water industry
- Whilst most representatives struggled to initially articulate benefits of an open market after further probing all were able to mention a number of potential benefits (and these mirror those stated by non-households in the first 'Uncharted Waters' research) there are concerns around de-bundling of services, particularly splitting water supply from billing and metering
- An on-going communication campaign was called for – targeted at both the representative organisations and their members. Representatives call for information to help them provide their members with accurate and timely information about the changes in the non-household market.

## **Market design**

- The market design needs to take into account lessons learnt from other deregulated sectors, such as energy and telecoms where small companies struggle to negotiate the best deals and larger businesses need specialist procurement teams (which are already in place to support the wider business and are also experienced in negotiating with suppliers from other deregulated sectors)
- There is general agreement from representatives of the key pillars of market design identified in the first 'Uncharted Waters' research
- As with the first 'Uncharted Waters' research, representatives are somewhat sceptical that their members will actually switch suppliers

## **Contracts**

- As with the first 'Uncharted Waters' research, there is strong opposition of auto rollovers of contracts and hidden charges. There is a call for clear exit clauses, notice periods and transparent costs
- Contracts for smaller companies are expected to be simple to understand and easy to compare for non experts
- The proposed contract was also felt to be broadly acceptable although representatives recognise the need for their larger members to be able to negotiate bespoke contracts (although these are seen to be the minority of members).

## **D. Customer Protections**

- In the event of a retailer failure, representatives believe their members should default to the "incumbent" water supplier without any interruption to supply (and with no financial disbenefit to the customer). This view is consistent with that expressed in the 'Uncharted Waters' research
- The Guaranteed Service Standards are felt to be broadly acceptable although representatives had some concerns about how retail and wholesale service standards would fit together for the end customer benefit.

## **E. Developers**

- Across the research, there are a number of concerns that specifically relate to Developers. It is felt that, due to the unique nature of their operations, they have a number of unique requirements that are not being met by the current market structure and proposed market reform is seen as exacerbating rather than improving the situation.

# **APPENDIX A**

## **Topic Guide**

Hello. My name is ... and I work for an independent market research company called Accent. We have been conducting a programme of research for the Consumer Council for Water exploring Business customers' views on their water companies' service and their thoughts on the future of the water market. As part of this we are interested in your views as an organisation that represents { } sector. The Consumer Council for Water (CCWater) is an independent organisation and has represented water and sewerage consumers in England and Wales since October 2005. Thank you very much for agreeing to help us with this research.

The research is being conducted in accordance with the Code of Conduct of the Market Research Society (MRS) and also with the Data Protection Act, with whom Accent is registered. This means that everything you say here this evening is confidential and will not be attributed to you personally.

The discussion will last 90 minutes in which time we will be finding out what key issues are important for the Members that you represent. We will show you some materials which will describe how the market is set up now and how this will change, and we will be working with you to shape the design of the new market – how you think it should be set up, etc.

Can I stress that we are looking for your views. There are no right or wrong answers.

For information, when we are talking about the 'water company' we are talking about the regional water and sewerage company, which provides water, sewerage, drainage and trade effluent services

### Introduction/warm up

5 mins

Name

Roles and responsibilities of {Umbrella Organisation}

Your responsibilities

Tell us about the sort of Members you represent

Size, Premises, etc

Is there a typical Member you represent

How are they different

What services do they typically receive from their water companies – water, waste, trade effluent, SWD

### Understanding the key issues for their businesses

15 mins (

As you will have seen from the 'homework' exercise we sent out to you, we are keen to understand what you think are the key issues for the Members you represent – these are issues relating to their relationship with their water and sewerage company or companies if they have sites in different parts of the country

### Review of Task One

- What sort of relationships do the Members you represent have with their water companies
- How does that compare to other utilities
- What do you think concerns them about their water company/companies
- What kind of things would they most like to see addressed
- How are these issues different for water companies than other utilities
- Thinking about the whole relationship that Members have with their water companies, what are the concerns or issues
- Probe on:
  - Services
  - Billing
  - Communications

### Initial Views on Market Reform

10 mins (

### Review of Task Two

- What are your initial thoughts on market reform
- Were you aware of this already
  - How aware
  - What did you know
  - Did you already know that the Scottish market opened for Business customers in 2008
    - Have you had any feedback from your Members on this
    - Is there anything that the English market could learn from their experience
  - Was there anything you immediately wanted to know but wasn't easy to discover
- What do you think will be positive about it
  - Spontaneous then Showcard A
- What do you think would be problematic
- Thinking about the whole relationship between the Members and their water companies, what reassurances do you think they will need
  - Service
  - Billing
  - Communications

### Market Design

15 Mins (

We are really keen to understand your views on how the market should be designed to ensure that the Members you represent remain protected in an open market but still allows them to benefit from competition

- Explore last box on Task two
- What are the key things that need to be built into the new market place
  - Think about other service providers e.g. finance, utilities
  - What can we learn from those markets
  - What should be the same
  - What should be different
  - What do you think would make the Members you represent switch in a competitive water market
  - What do you think would stop them switching
- Show the key pillars of market design (Showcard B) *Explain that these came out of the 1<sup>st</sup> stage of research but we want to see if they agree/disagree or can build on these from the perspective of their Members*
- - Fair
  - Simple
  - Transparent
  - Flexible
- What do you think of these – are they right for your members? Would they have anything to add?
- How important is each one
- What should be considered under each of these headings
- How can the market be fair, simple, transparent, flexible

### **Presentation of Market Scope**

15 mins (

### **Present Stimulus Pack C1\_C5c**

#### **C1-C3**

- Now you have some more information, what are your views
- How do you think members would feel about buying water services from one provider and sewerage services from another
- What are the advantages and disadvantages
- What about the possibility that they may be able to choose to have different retailers for different meters – so that the meters could be read and billed by different providers
- What are the advantages and disadvantages

**For those who represent companies in the BORDERS**

Wales is not part of this market reform therefore, some members may be able to switch one of their service providers. For example, if supplied by Dee Valley for your water then rules for Wales apply i.e. to switch the business will need to use more than 50 megalitres of water a year at each premises, and this service may not be able switched to another retailer. But with sewerage dealt with by United Utilities then rules for England apply and the retail sewerage service could be switched to another retailer regardless of how much water they use as the consumption threshold in England will drop to zero in April 2017.

What are your thoughts on this?

Would it make a difference to your members in any way?

How should this situation be explained to businesses in those areas?

Now we just want to understand a bit more detail around the market design

- 1) **Learning about the market – Business customers need to be informed about the changes in the market**
  - How do you think this should happen
  - What sort of information should be provided (Showcard D)
    - Message
    - Channel
    - Source
    - Timings
  - Should Members be allowed to opt out of receiving market information – that is information about the changes in the market not sales information
  - What about marketing/sales information when the market is open, should they be allowed to opt out of this
  
- 2) **Switching Process – Business customers need a switching process that is straightforward and easy to aid switching (refer to Task 3 from the pre-task)**
  - How do you think the switching process should work
  - What order did you put the steps into? Was anything missing? What did you take out?
  - Thoughts – how do you think this would work for your Members
  - Concerns and suggestions for addressing these
  
- 3) **Contracts and consumer protection**
  - What are your thoughts on contracts within a competitive water market
  - What sort of contract is appropriate for your Members
  - Show contracts slides from presentation (Showcard F) *Explain that these came out of the 1<sup>st</sup> stage of research but we want to see if they agree/disagree or can build on these from the perspective of their Members*
    - - Timescale
      - Service levels
      - Payment T&C
      - Standard late payment fees
      - Tariff structure
      - Provision of annual consumption data
      - Notice period
      - Rollovers
    - What sort of protection do you think the Members you represent need in a competitive market

- Show service levels (Showcard G)
  - Were you aware of these service standards
  - Should there be consistency across regions for Members who have multi sites across England
- 
- Are there any other thoughts you have regarding market reform or market design that you want to share with us to help design the open water market

**Thank and close**

CONSUMER COUNCIL FOR

CYNGOR DEFNYDDWYR



**Consumer Council for Water**

1st Floor, Victoria Square House, Victoria Square, Birmingham, B2 4AJ

Visit our website: [www.ccwater.org.uk](http://www.ccwater.org.uk)

Follow us @WaterWatchdog

**For more information about this research, contact:**

Evan Joannette, Policy Manager

Email: [evan.joannette@ccwater.org.uk](mailto:evan.joannette@ccwater.org.uk)

Tel: 0121 345 1028