July 2026

Guidance on Meeting Licence Condition G in Relation to Sewer Flooding

Ofwat

About this document

This document is a consultation on draft guidance setting out how companies should apply Licence Condition G (the customer-focused licence condition) when supporting customers affected by sewer flooding. It explains the evidence and issues informing the guidance, presents Ofwat's proposals, and includes a draft of the guidance text.

Who should read this document

- Water and wastewater companies
- Customer service directors and operational leads responsible for sewer flooding response
- Consumer bodies (including CCW)
- Other interested stakeholders

We welcome responses to our consultation by 21 September 2026.

Responding to this consultation

Our consultation questions

We welcome all responses to our consultation, and particularly answers to the following questions:

Minimum expectations	Consultation questions
1. Companies should apply the definitions set out in Table 1 consistently across their operations, communications and reporting to customers and Ofwat.	1. Do you agree with our proposal to introduce these common definitions relating to sewer flooding service and support? 2. Are there any further definitions which we should include in our guidance? 3. Are there any further considerations, evidence or practical examples you would highlight? For example: o Do the proposed definitions support consistency and improved customer outcomes across the sector? o Are there any risks or unintended consequences associated with standardising definitions across the sector?
2. Companies should adopt an end-to-end approach to the management of sewer flooding incidents, ensuring that customers are supported, informed and reassured throughout the entire journey from initial contact through to resolution and aftercare.	4. Do you agree with our proposal for introducing a minimum expectation relating to delivering good customer service across the full customer journey? 5. Are there any further considerations, evidence or practical examples you would highlight? For example: o Does the expectation go far enough to deliver good customer outcomes? o Are there additional elements of the customer journey that should be more explicitly reflected (for example, aftercare or interaction with third parties)?
3. Companies should ensure that communications with customers experiencing sewer flooding are proactive, timely, clear and tailored to the customer's circumstances and communication preferences.	6. Do you agree with our proposal for introducing a minimum expectation relating to proactive, timely and tailored communication? 7. Are there any further considerations, evidence or practical examples you would highlight? For example: o Are the expectations sufficiently clear on what constitutes effective communication at different stages of the customer journey? o Are there any specific circumstances (for example, delays or complex incidents) where further clarity would improve consistency of outcomes?
4. Companies should publish their response time policies and attend sewer flooding incidents	8. Do you agree with our proposal for introducing a minimum expectation relating to response times and transparency?

promptly, with response arrangements reflecting the urgency and potential impact on customers.	9. Are there any further considerations, evidence or practical examples you would highlight? For example: o Do you consider the proposed benchmarks and prioritisation approach are appropriate and achievable in practice? o Are there any implementation challenges or unintended consequences associated with the proposed approach?
5. Companies should provide and clearly communicate a minimum clean-up service following sewer flooding incidents. Companies should ensure that customers understand what clean-up support will be provided, what is excluded, when clean-up is expected to begin, and the timescales within which support is expected to be delivered.	10. Do you agree with our proposal to introduce a minimum expectation relating to clean-up support and transparency? 11. Are there any further considerations, evidence or practical examples you would highlight? For example: o Are the expectations sufficiently clear on timing, scope and communication of clean-up services? o Are there additional factors (for example, interaction with insurance or third-party providers) that should be more explicitly addressed?
6. Companies should proactively identify customers at high risk of harm	12. Do you agree with our proposal to introduce a minimum expectation relating to proactively identifying customers at high risk of harm? 13. Are there any further considerations, evidence or practical examples you would highlight? For example: o Do the framework and minimum factors provide sufficient clarity to support consistent application in practice? o Are there any practical challenges in implementing this approach, including in relation to data, systems or staff capability?
7. Companies should use a 5-year definition of repeat incidents for the purposes of tracking repeat incidents and determining the level of support provided to customers.	14. Do you agree with our proposal to introduce a minimum expectation relating to the use of a consistent definition of repeat incidents? 15. Are there any further considerations, evidence or practical examples you would highlight? For example: o Do you consider the proposed five-year timeframe is appropriate and proportionate? o Are there any practical challenges in applying this definition consistently across systems, performance management and reporting?
8. Companies should provide customers at high risk of harm with an appropriate level of tailored support that is designed to reduce the risk of potential harm	16. Do you agree with our proposal to introduce a minimum expectation relating to providing tailored support to customers at high risk of harm? 17. Are there any further considerations, evidence or practical examples you would highlight? For example:

	o Do the examples of support provide sufficient clarity on the level and type of support expected? o Are there additional support measures or approaches that should be reflected to improve customer outcomes?
9. Companies should have governance arrangements that ensure that the customer impacts of sewer flooding incidents are appropriately considered, prioritised and scrutinised.	18. Do you agree with our proposal to introduce a minimum expectation relating to governance, accountability and oversight? 19. Are there any further considerations, evidence or practical examples you would highlight? For example: o Do the expectations strike the right balance between setting clear outcomes and allowing flexibility in governance structures? o Are there additional governance or escalation practices that would strengthen delivery against this expectation?
10. Companies should ensure learning from customer experiences is embedded with company processes and is applied in order to continuously improve customer outcomes.	20. Do you agree with our proposal to introduce a minimum expectation relating to embedding learning and continuous improvement? 21. Are there any further considerations, evidence or practical examples you would highlight? For example: o Are the expectations sufficiently clear on how customer insight, complaints and case reviews should inform decision-making? o Are there additional assurance or monitoring mechanisms that would strengthen continuous improvement in practice?

We encourage respondents to provide evidence, practical examples and views on the aspects of the draft guidance and proposed minimum expectations most relevant to their role, expertise or experience.

How to respond

We welcome any comments on this consultation. We encourage responses to be submitted via our consultation platform: https://consult.ofwat.gov.uk.

However, you can also respond by email to customerfocus@ofwat.gov.uk or post to:

Consultation response
Ofwat
Centre City Tower

7 Hill Street
Birmingham B5 4UA

If you intend to respond by email, please include the subject line: "Consultation Response – Licence Condition G Sewer Flooding Guidance".

The closing date for this consultation is 21 September 2026.

If you wish to discuss any aspect of this consultation, please email customerfocus@ofwat.gov.uk.

We intend to publish responses to this consultation on our consultation platform. Subject to the following, by providing a response to this consultation you are deemed to consent to its publication.

If you think that any of the information in your response should not be disclosed (for example, because you consider it to be commercially sensitive), an automatic or generalised confidentiality disclaimer will not, of itself, be regarded as sufficient. You should identify specific information and explain in each case why it should not be disclosed and provide a redacted version of your response, which we will consider when deciding what information to publish. At a minimum, we would expect to publish the name of all organisations that provide a written response, even where there are legitimate reasons why the contents of those written responses remain confidential.

In relation to personal data, you have the right to object to our publication of the personal information that you disclose to us in submitting your response (for example, your name or contact details). If you do not want us to publish specific personal information that would enable you to be identified, our privacy policy explains the basis on which you can object to its processing and provides further information on how we process personal data.

In addition to our ability to disclose information pursuant to the Water Industry Act 1991, information provided in response to this consultation, including personal data, may be published or disclosed in accordance with legislation on access to information – primarily the Freedom of Information Act 2000 (FoIA), the Environmental Information Regulations 2004 (EIR) and applicable data protection laws.

Please be aware that, under the FoIA and the EIR, there are statutory Codes of Practice which deal, among other things, with obligations of confidence. If we receive a request for disclosure of information which you have asked us not to disclose, we will take full account of your explanation, but we cannot give an assurance that we can maintain confidentiality in all circumstances.

Executive summary

This document is a consultation on Ofwat's draft guidance on how water and wastewater companies should comply with Licence Condition G when supporting customers affected by sewer flooding. Sewer flooding remains one of the most distressing service failures customers can experience, with significant practical, emotional and financial impacts. Our review of how water and wastewater companies supported customers affected by sewer flooding in 2024-25, together with customer research carried out jointly with the Consumer Council for Water (CCW), found a mixed picture across the sector: while some aspects of customer care have improved, customers continue to experience inconsistency in response, communication, clean-up, support for repeat or severe incidents, and the resolution of underlying problems. We therefore consider that clear guidance is needed to improve consistency, transparency and accountability in how companies support customers through the full customer journey.

The draft guidance is intended to clarify our expectations under Licence Condition G and to support better customer outcomes where sewer flooding occurs. It covers the end-to-end customer journey and focuses on the areas where our review identified the greatest variation and risk of customer harm: response and resolution, clean-up arrangements, support for customers at high risk of harm or experiencing repeat incidents, governance and executive oversight, and communications.

The consultation also proposes a small number of common definitions to improve consistency in terminology and reporting across the sector. The draft guidance does not create new legal duties but explains more clearly how we expect companies to meet their existing obligations in practice. We welcome views on the draft guidance, the draft minimum expectations and the consultation questions set out in Section 3. We intend to finalise the guidance for publication in autumn 2026 and expect companies to reflect the guidance in their future reporting and compliance arrangements.

Contents

1. Introduction

1.1. Purpose of our proposed sewer flooding guidance

Sewer flooding is one of the most distressing service failures customers can experience, with significant emotional, practical and financial impacts. Our Sewer Flooding Customer Care Review (2024–25) identified wide variation in how companies support customers during such incidents. This consultation sets out Ofwat's proposals to improve consistency, transparency and accountability under Licence Condition G.

1.1.1. Why are we introducing sewer flooding guidance under the principles of customer care

In recent years we have seen a reduction in the numbers of sewer flooding incidents in people's homes and gardens. In PR19 we introduced an Internal Sewer Flooding outcome delivery incentive on all wastewater companies with the aim of reducing internal sewer flooding by 41%[1] across the 2020-2025 period. This set a target on the number of internal flooding incidents per year, accounting for flooding due to overloaded sewers (hydraulic flooding) and due to other causes (FOC). This incentive has delivered a reduction of 29% in the number of internal sewer flooding incidents across the 2020-25 period, with two companies reducing the number of incidents by 70%.

We welcome this progress in reducing the number of sewer flooding incidents, but we recognise that sewer flooding incidents will continue to occur and therefore there is a need to improve the protections and experiences of those customers who do experience sewer flooding. Our customer research found that customers who experience sewer flooding incidents often have problems with the communication from and actions taken by water companies in responding to and resolving the incident. It also found that those experiencing the most impactful or multiple incidents had a particularly poor experience.

Along with continuing to drive down the number of sewer flooding incidents, it is important that companies also improve the service and support they provide to customers who experience these incidents. This guidance intends to set expectations on companies in relation to how they support their customers when these incidents occur.

Licence Condition G requires companies to deliver high standards of service and support. It covers all aspects of company activities in providing care for its customers. Where companies fail to demonstrate compliance with their licence, we will investigate and this may result in enforcement action.

[1] Water Company Performance Report 2024-25

We have published some supplementary guidance for licence condition G which provides clarification for companies about how we expect them to deliver the principles of customer care. We take account of this guidance when considering whether companies have delivered the requirements set out in the customer-focused licence condition.

Our supplementary guidance encourages companies to take an outcomes-focused approach to compliance in that it sets out expectations and minimum standards for the service and support that is delivered to customers, along with some detail on how we expect companies to achieve these standards.

Companies are able to either meet the expectations in this guidance, or explain and evidence how an alternative approach delivers these outcomes in an equivalent or better way. This enables companies to take innovative approaches while ensuring high standards for consumer protections are maintained.

This guidance does not replace or modify companies' obligations under their licence conditions, and companies remain responsible for understanding and complying with those obligations and for ensuring that the outcomes delivered to customers are consistent with the requirements of the customer-focused licence condition. The guidance sets out Ofwat's current view of the standards and approaches that are likely to support compliance, but it remains for companies to determine how best to meet their obligations and deliver the required customer outcomes.

1.1.2. Empowering customers

By setting a clear set of expectations for water companies' treatment of customers who experience sewer flooding, we hope to empower customers to better understand what they can expect from companies.

For example: if a customer feels they may have been let down by their company, then having access to a list of the regulators' expectations can provide a benchmark to see whether their company's behaviour is in line with good practice. If it is not, then they may decide to challenge their company; for example, by submitting a complaint.

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1.2. What this guidance covers

In developing our draft guidance, we have engaged extensively with the water sector and carried out customer research to understand the most important issues facing customers who experience sewer flooding incidents. In addition, we have considered the findings of our review of companies' compliance with Licence Condition G in relation to sewer flooding incidents. This has helped to shape our understanding of the priority areas that need to be addressed through guidance and where we expect companies to focus and increase their efforts to improve the experience of customers through the customer journey.

This guidance applies to all water and wastewater companies in England and Wales and covers the end-to-end customer journey when sewer flooding occurs. It is intended to be read alongside other relevant guidance, most notably our Service for all vulnerability guidance. No part of this guidance is intended to replace or supersede our other guidance.

In our compliance review we set out intended outcomes we want to achieve for customers that will support customers across the full customer journey when they experience internal and / or external sewer flooding incidents. These are set out in Appendix 1, Table A1.

Our intention is that this guidance covers all relevant aspects of Licence Condition G as it applies to sewer flooding. However, not all areas require the same level of prescription. Some activities identified in our review, such as making payments under the Guaranteed Standards Scheme, are governed by separate legislative processes. We also found that in other areas approaches and outcomes are already broadly consistent, and what we would expect, and we therefore propose to keep our guidance for these areas relatively light-touch. In areas where we found variation in company approach and risk of customer harm, we think clearer expectations will improve outcomes and accountability. We discuss our approach to developing these expectations in section 2.

Accordingly, the draft guidance, set out in section 3 of this document focuses on four priority areas:

- response and resolution times;
- clean-up arrangements;
- support for customers at high risk of harm, including repeat incidents;
- governance and executive oversight.

These areas represent key points in the customer journey where failures or inconsistencies can lead to the greatest levels of harm. We also have identified clear and accurate communications as a key cross cutting priority across the entire customer journey.

Our draft guidance does not address asset performance, environmental compliance or pollution incidents in relation to sewer flooding incidents, which are governed by other licence conditions and regulatory requirements. Similarly, capital investment decisions and long-term network planning are outside of scope of Licence Condition G and hence not considered within this guidance.

Whilst our draft guidance does not consider performance commitments relating to sewer flooding incidents, we have aligned our approach where appropriate to ensure this guidance complements related regulatory tools to improve performance relating to sewer flooding incidents.

2. Our approach

2.1. Background

In May 2022 we published joint research with CCW into the experiences of customers that had suffered sewer flooding. This was followed up by a workshop and a call to action with companies to make improvements. We published an update report in November 2024. We found some improvements in the support companies provide to their customers since we first reviewed this in 2022. However, we also reported that much more was needed if all customers are to receive adequate support and resolutions.

As a result of these findings, in 2025 we carried out our assessment of compliance with Licence Condition G. We published our key findings in our Sewer Flooding Customer Care Review (2024–25) report. Overall, our assessment found a mixed picture of how companies provide support to customers experiencing sewer flooding, with examples of both good and poor practice identified. We committed to introducing clear guidance on how companies should support customers experiencing sewer flooding incidents, which clarifies our expectations under Licence Condition G.

We will expect all companies to act on this guidance, building it into their processes and procedures, as appropriate, and providing progress updates and proof of compliance through their future annual reporting. We will also consider whether companies have taken account of the guidance when considering compliance with Licence Condition G in future.

2.2. Developing minimum expectations

Our draft guidance introduces minimum expectations in four priority areas where we expect companies to minimise customer harm when sewer flooding incidents occur. This section explains how we developed our minimum expectations in these areas.

2.2.1. Response and resolution times

Our evidence shows that response and resolution times are key drivers of customer experience in relation to sewer flooding incidents. While there is broad agreement that companies should respond promptly and resolve incidents effectively, there is variation in how these expectations are defined, measured and delivered in practice. While expectations to respond quickly are widely recognised across the sector, our review identified variation in how response arrangements are designed and delivered in practice, including differences in prioritisation, measurement and communication of response times (see Section 3.1, Table 1 – Response times). This variation can contribute to inconsistent customer experiences and limit transparency.

In relation to response, our evidence indicates that the timeliness of initial attendance is a critical factor in shaping customer perceptions. Delays in attendance can increase distress and create a perception that incidents are not being treated with sufficient urgency, whereas prompt attendance can provide reassurance, even where resolution takes longer. In our review we identified variation in how companies define and measure response times, including when the response “clock” begins and how performance is communicated, which can limit transparency for customers and comparability across the sector.

In contrast, resolution is inherently more complex. Incidents vary significantly in their causes, scale and circumstances, and resolution may involve multiple stages, including investigation, mitigation and longer-term works. The time taken to resolve incidents may also be affected by factors outside a company’s control, such as access constraints or third-party involvement.

Our approach to developing expectations reflects these differences. We want to introduce clearer and more consistent expectations in relation to response times, to improve transparency and accountability. Similarly for resolution, we want companies to focus on improving consistency of experience for customers by setting clear expectations on communication, support and transparency throughout the customer journey.

Across both response and resolution, we want companies to prioritise customer harm, ensuring that response and resolution activities reflect the severity and impact of the incident. This includes providing sustained support to customers throughout the incident, particularly where resolution is prolonged or complex.

2.2.2. Clean-up arrangements

Our evidence[2] shows that clean-up is a key component of the overall experience of customers affected by sewer flooding, with delays or poor delivery contributing significantly to distress and disruption experienced by customers. Our Sewer Flooding Customer Care Review found variation in how clean-ups are communicated and delivered across the sector. We want companies to provide clear information about what the customer can expect, and to deliver reliable clean-up services in line with those commitments, in order to improve the experience for customers.

[2] Evidence includes Ofwat's sewer flooding customer care review; Ofwat & CCW customer research; and wider finding on communication and support during incidents.

This evidence is reinforced by engagement with companies, which has highlighted a lack of clarity and consistency in relation to both the timing and scope of clean-up across companies. In particular, there is no consistent approach to when clean-up should begin, whether expectations should differ between internal and external flooding, or what activities should be included within a clean-up service. There is also evidence that customers may experience confusing messages regarding the interaction between company-provided clean-up and insurance arrangements, which can affect decision-making and delay support following an incident.

We consider that the variability in timing, scope and communication of clean-up contributes to inconsistent customer outcomes, and that clearer expectations are needed to improve transparency and establish a baseline level of service. However, we also recognise that incidents vary significantly in scale and impact, and that companies should retain flexibility to respond proportionately to different circumstances and have reflected that in our proposals within this consultation.

We are proposing to introduce expectations which are clear on when clean-up should begin, what activities customers can reasonably expect as part of a clean–up, and how this is communicated.

These expectations will act as a protection for customers, but we expect companies to go beyond this in the interests of their customers, by providing additional or enhanced support where appropriate. Clean-ups should be considered as part of the wider customer journey, ensuring that customers are supported from initial response through to restoration and aftercare, and that decisions reflect the scale and impact of the incident on the customer.

2.2.3. Support for customers at high risk of harm, including repeat incidents

Our 2022 customer research shows that customers experiencing repeated sewer flooding incidents can experience a significant impact, including long term emotional distress and financial consequences. Our second wave of research in 2024 found little improvement for those facing particularly impactful or multiple incidents; those customers still reported low satisfaction with the quality of service provided by their water companies.

We recognise that not all incidents are the same, and not all incidents have the same impact. It may be the case that a particularly severe one–off external incident has a greater impact than less severe repeated internal sewer flooding. Equally, a customer's individual circumstances and extra help needs at the time of the incident may mean that the impact of a similar incident is greater for that customer than for another. We want companies to provide appropriate support to all customers based on the level of potential harm, and do not want to endorse an approach that leads to an outsized or sole focus on responding to repeat sewer flooding or internal sewer flooding incidents at the expense of other customers with severe impacts.

As such, our proposed guidance sets out a framework by which companies can assess whether customers may be considered at high risk of harm, and therefore whether they should be provided with additional tailored support in line with the minimum expectations set out for repeat incidents. We do not propose to monitor the number of customers at high risk of harm; however, if we have reason to believe a company is in breach of its licence requirements in relation to sewer flooding, we will monitor the usage of this framework for that company. It also sets out that these customers should receive an appropriate level of additional tailored support in order to mitigate potential harm, and provides some non-exhaustive examples for specific circumstances.

Repeat incidents often put customers at high risk of harm. Our review found that companies all have different approaches to defining and tracking repeat incidents, and supporting the customers that experience them. Given the additional impacts often seen for customers experiencing repeat incidents, we believe it is important that there is greater standardisation in approaches across the sector in order to ensure minimum standards of support are met.

Ofwat has already taken steps to monitor repeat incidents. From 2025-26, companies will be required to report on the number of customers that experienced an incident that previously experienced an incident in the preceding one, three and five years. This will enable Ofwat to better understand the prevalence of repeat incidents in the sector. Our proposed guidance requires companies to use a consistent definition of repeat incidents (see Section 3.1) internally for the purposes of tracking performances and determining whether customers are at risk of high harm. It also sets out that the systems used to track repeat incidents should be designed in a way which reduces communication burdens for customers experiencing repeat incidents.

2.2.4. Governance and executive oversight

Our review shows that there is variation in how companies monitor performance, escalate issues and learn from sewer flooding incidents, and that this can affect the consistency of outcomes experienced by customers. This includes differences in how incidents are prioritised, how quickly issues are escalated, and the extent to which learning from past incidents is embedded into company processes.

This evidence is reinforced by engagement with companies at our April 2026 workshop, which highlighted the importance of governance structures in providing assurance to customers that sewer flooding incidents are taken seriously and appropriately prioritised. Discussions emphasised the role of executive accountability, structured oversight of performance, and governance processes that support the identification of issues and the embedding of learning over time.

Engagement with companies has also highlighted the importance of effective governance in the management of repeat and complex cases. These cases often require coordinated oversight across teams and, where governance arrangements are less developed, there is a greater risk that incidents are not progressed consistently or that opportunities to improve outcomes are missed.

Our approach to developing expectations for governance reflects these findings. We consider that clearer and more consistent expectations are needed to ensure that governance arrangements support effective oversight, prioritisation and progression of sewer flooding incidents, particularly where customers are most affected.

In particular, governance arrangements should provide clear visibility of sewer flooding incidents across the organisation, particularly those that are repeat, complex or high-impact. This should be supported by defined processes for monitoring performance and ensuring that incidents are progressed appropriately.

We also consider that governance should establish clear senior ownership and accountability for sewer flooding performance and customer outcomes. Senior leaders should have sufficient visibility of performance in this area and should be accountable for ensuring that appropriate action is taken where issues arise.

Governance arrangements should include regular and structured review of performance, including the timeliness and effectiveness of response, resolution and customer support. This should draw on a range of information sources, including operational data, case reviews and customer insight, to ensure that performance is understood in context.

There should be processes in place within companies to support effective escalation, particularly for complex or longstanding cases. Clear escalation processes should enable timely intervention where incidents are not progressing as expected, helping to ensure that barriers to resolution are identified and addressed.

Governance should extend beyond the monitoring of operational performance to include a stronger focus on customer experience. This includes ensuring that customer feedback, complaints and case studies are considered alongside operational data, and that governance processes support the identification and resolution of poor outcomes.

Finally, governance arrangements should support learning and continuous improvement. This includes reviewing incidents, identifying trends and recurring issues, and embedding lessons and learnings from the experiences and approaches of other companies into policies, processes and operational approaches over time. Companies should also have appropriate assurance processes in place to provide confidence that governance arrangements and associated policies are being applied effectively in practice.

At the same time, we recognise that governance structures will vary across companies. Expectations should therefore focus on the outcomes that governance arrangements should deliver, including clear accountability, effective oversight and demonstrable continuous improvement, rather than prescribing a single organisational model.

2.2.5. Communications

Our review shows that communication is a key driver of customer experience during sewer flooding incidents, and that shortcomings in communication can contribute to poor outcomes for customers. Customers report feeling unsupported where communication is unclear, inconsistent or reactive, including where they are required to repeatedly seek updates or explain their situation.

This is reinforced by engagement with companies at our April 2026 workshop, which highlighted variation in how communication is managed during incidents. Some companies have developed structured arrangements, including incident-specific communication plans and clear points of contact, while others rely on general customer service processes that are not tailored to the nature or complexity of sewer flooding incidents. This variation can result in different levels of service for customers experiencing similar events.

Our joint customer research with CCW and our own engagement with companies indicate that customers expect communication to be proactive, clear and transparent. They also indicate that customers expect communication to be proactive, clear and transparent. In particular, customers value receiving regular updates without needing to request them, clear explanations of what is happening and what to expect next, and reassurance that their situation is being taken seriously. Where these expectations are not met, customers may experience increased uncertainty and a lack of confidence in how their case is being managed.

Our approach to developing expectations for communication reflects these findings. We consider that clearer and more consistent expectations are needed to ensure that communication supports customers effectively throughout the incident and contributes to a more consistent baseline of service across the sector.

In particular, communication should be proactive and continuous, with companies taking responsibility for keeping customers informed at key stages of the incident rather than relying on customers to initiate contact. Customers should be provided with clear, accurate and accessible information, including what has happened, what actions are being taken, what they can expect next, and any relevant timescales. Where timescales are uncertain, the reasons for this should be explained clearly.

We also consider that communication should be consistent across teams and channels, supported by systems and processes that enable information to be shared effectively. This should reduce the need for customers to repeat information and help ensure that messages are aligned throughout the incident.

Communication should also include clear information on the support available to customers, including clean-up, compensation and any additional assistance, provided at an appropriate stage in the customer journey so that customers are able to make informed decisions.

At the same time, communication should be responsive to the circumstances of the customer. This includes ensuring that communication is empathetic and proportionate to the level of impact experienced, and that additional support is provided where customers may be particularly affected or require more tailored engagement.

Finally, we consider that companies should use customer feedback, complaints and case reviews to improve communication over time. This includes identifying where communication is unclear, inconsistent or delayed, and taking steps to ensure that these issues are addressed through improved processes and approaches.

2.3. Introducing consistency in terminology

Our review found that companies use a range of definitions and terminology when describing key aspects of sewer flooding incidents, including how response times are measured, how repeat incidents are identified, and how support is structured for customers. This variation can make it more difficult for customers to understand what they should expect, and can limit transparency and comparability across the sector.

Providing greater clarity and consistency in the terminology used by companies can support improved customer understanding, more consistent service delivery, and clearer assessment of performance. It can also help to better align how companies manage sewer flooding incidents with wider regulatory frameworks, including performance reporting.

To support this, we are proposing definitions for a small number of key terms that underpin the expectations within the draft guidance. These definitions are intended to provide a common reference point for companies and stakeholders, rather than to prescribe a single approach in all circumstances. Companies may adopt alternative approaches where they can demonstrate that these deliver equivalent or better outcomes for customers.

The proposed definitions are set out in section 3.1 as part of our draft guidance for consultation.

2.4. Monitoring approach

Our intention is for companies to continually improve their customer service and support in relation to sewer flooding incidents in customers' homes or on their property, and to facilitate this we intend to take a proportionate monitoring approach, tailoring our monitoring to reflect the maturity of a company's approach to customer service and support.

In applying a proportionate and risk-based approach to our monitoring we will typically rely on information provided by companies through their APR submissions, including their statement of compliance with Licence Condition G. We will also considered regulatory insight, and external data including customer complaints data and information provided by stakeholders.

Where we have evidence which appears inconsistent with the expectations within this guidance, we may seek clarification or additional information from companies. Companies who can evidence and demonstrate strong customer outcomes in relation to service and support during sewer flooding incidents may experience lighter monitoring with respect to demonstrating compliance. This may include results of customer research, demonstration of relevant policies and approaches, how the company demonstrates continual learning and improvements, and any further relevant data relating to service performance.

The draft guidance clarifies how obligations under Licence Condition G should be interpreted in practice, which strengthens the consistency of our compliance assessments and enforcement decisions. This guidance does not create new legal duties; it sets out clearer expectations for company performance and customer outcomes in regard to flooding incidents. Where we have evidence that a company is not meeting its licence requirements Ofwat has a duty to enforce.

3. Draft guidance

This section sets out the draft guidance for consultation relating to sewer flooding customer care.

3.1. Definitions relating to sewer flooding service and support

Minimum expectation 1: Companies should apply the definitions set out in Table 1 consistently across their operations, communications and reporting to customers and Ofwat.

Companies should ensure that these definitions are embedded within internal systems, processes and staff training, so that key aspects of sewer flooding incidents—such as response times, repeat incidents and customers at high risk of harm—are identified, recorded and acted on in a consistent way.

Companies should use these definitions when communicating with customers, including when explaining what customers can expect during an incident, and when publishing information about company performance, to support transparency and comparability across the sector.

Where companies adopt alternative definitions or approaches, they should be able to explain and evidence how these deliver equivalent or better outcomes for customers.

Table 1: Proposed definitions for key sewer flooding terms

Term	Proposed definition
Repeat incidents	A repeat incident refers to a sewer flooding event that occurs at the same property within five years from the day that a previous sewer flooding first occurred.
Response time	Response time refers to the period between the point at which a sewer flooding incident is first recorded by the company—either through customer contact via any channel or through proactive identification—and the point at which a member of staff attends the incident to investigate the cause and determine an initial course of action. Companies should achieve sector-established benchmarks of 2 hours for internal flooding and 4 hours for external flooding on average, which reflect existing industry commitments.
Customers at high risk of harm	For customers at high risk of harm, the impact of a sewer flooding incident, alongside their personal circumstances or the company's response, creates a heightened

	likelihood of substantial detriment to their health, wellbeing, financial situation, or ability to access or use their home.
Case handler	A case handler refers to an individual, or clearly identifiable team, within the company who is responsible for coordinating the management of a sewer flooding incident from the customer's perspective. This includes maintaining oversight of the customer journey, supporting coordination across operational and customer service functions and relevant external agencies, and acting as a consistent point of contact.
Clean-ups (minimum service)	Clean-up refers to the actions undertaken by a company following a sewer flooding incident to remove sewage and contamination, clean and disinfect affected areas, and restore the property to a condition that is safe and reasonably habitable, taking into consideration the customer's individual circumstances.

Consultation questions

1. Do you agree with our proposal to introduce these common definitions relating to sewer flooding service and support?
2. Are there any further definitions which we should include in our guidance?
3. Are there any further considerations, evidence or practical examples you would highlight? For example:
   - Do the proposed definitions support consistency and improved customer outcomes across the sector?
   - Are there any risks or unintended consequences associated with standardising definitions across the sector?

3.2. Good service across the full customer journey

Minimum expectation 2: Companies should adopt an end-to-end approach to the management of sewer flooding incidents, ensuring that customers are supported, informed and reassured throughout the entire journey from initial contact through to resolution and aftercare.

This requires companies to take ownership of the customer experience across operational and customer service functions, ensuring that responsibilities are clearly aligned and that customers do not experience fragmentation in service delivery. Companies should ensure that communication is proactive, timely and accessible, including providing clear explanations to affected customers of what has happened, what will happen next, and what support is available.

We expect customers to be supported from the point of logging an incident, or the incident being identified by the company through to resolution and aftercare. This includes the customer being able to easily report and log an incident and understanding the next steps that can be expected, including in relation to case managers, response times and clean-ups (see Section 3.1, Table 1).

Once an incident is logged, we expect all internal sewer flooding cases to be supported by a single point of contact case manager. This will ensure that customers are not required to repeatedly provide the same information during an incident, and also in cases of repeat or ongoing incidents (see minimum expectation 7). The case manager should have access to relevant customer and property history, and any identified extra help needs, in order to tailor support appropriately. Systems and processes should support continuity of service and effective coordination across teams, including operational staff and clean-up functions.

Customers should continue to be effectively supported as clean ups are arranged, and resolution work is carried out, in line with the expectations in this guidance. This includes providing timely and accurate information, easy to contact case managers, and clarity over how any concerns can be escalated for further review.

Companies should be proactive in informing their customers of relevant Guaranteed Standards Scheme (GSS)[3] entitlements, how to apply for a payment (for external incidents) and when, and how they can expect to receive the payment. This should be easily accessible on the company webpage, and included in communications from their case manager. In addition we expect companies to inform customers of any additional voluntary financial support available to them, including when and how to access it. This requires clear guidance to staff to enable them to make quick voluntary payments where appropriate. Companies should support their customers with making any insurance claims by providing clear, relevant and timely information as required.

Consultation questions

4. Do you agree with our proposal for introducing a minimum expectation relating to delivering good customer service across the full customer journey?
5. Are there any further considerations, evidence or practical examples you would highlight? For example:
    - Does the expectation go far enough to deliver good customer outcomes?
    - Are there additional elements of the customer journey that should be more explicitly reflected (for example, aftercare or interaction with third parties)?

Minimum expectation 3: Companies should ensure that communications with customers experiencing sewer flooding are proactive, timely, clear and tailored to the customer's circumstances and communication preferences.

[3] The guaranteed standards scheme (GSS): summary of standards and conditions – Ofwat

Effective communication is a fundamental component of how companies support customers during sewer flooding incidents. Clear, timely and proactive communication can reduce uncertainty, help customers understand what to expect, and provide reassurance that their situation is being taken seriously.

Communication should be proactive and continuously maintained throughout the incident. Customers should receive consistent updates at key stages, including response, clean-up and resolution. Companies should consider the communication preferences of their customers during and following an incident, whilst also ensuring that customers get the right information at the right time.

Information provided should be clear, accurate and easy to understand, including explaining what has happened, what actions are being taken, what to expect next and any relevant timescales. Communications should include clear information on the support available to customers, including clean-up, compensation and any additional assistance, provided at an appropriate stage in the customer journey so that customers are able to make informed decisions. Communication should be tailored to the circumstances of the customer, including where additional support may be required, taking account of our Service for All guidance.

Where delays occur, communication should remain clear and continuous, including explaining reasons for delays and expected next steps.

Communication should be consistent across teams and channels, supported by systems and processes that enable information to be shared effectively. This should reduce the need for customers to repeat information and help ensure that messages are aligned throughout the incident.

Consultation questions

6. Do you agree with our proposal for introducing a minimum expectation relating to proactive, timely and tailored communication?
7. Are there any further considerations, evidence or practical examples you would highlight? For example:
    - Are the expectations sufficiently clear on what constitutes effective communication at different stages of the customer journey?
    - Are there any specific circumstances (for example, delays or complex incidents) where further clarity would improve consistency of outcomes?

3.3. Response and resolution

Minimum expectation 4. Companies should publish their response time policies and attend sewer flooding incidents promptly, with response arrangements reflecting the urgency and potential impact on customers.

Timely attendance at sewer flooding incidents is a fundamental component of an effective customer response. Prompt initial response can reduce the immediate impact of flooding, provide reassurance to customers, and establish confidence that the incident is being treated with appropriate urgency.

In practice, companies should have arrangements in place to enable timely attendance at incidents, supported by processes that prioritise response according to the likely severity and impact on customers. Incidents involving internal flooding, significant disruption, or customers at higher risk of harm should typically be prioritised for earlier attendance.

A consistent and transparent approach to response times can support improved customer experience and greater comparability across the sector. Companies should therefore seek to work towards attending internal sewer flooding incidents within 2 hours and external flooding incidents within 4 hours of the customer reporting an incident (or the company proactively identifying the incident), measured on an annual average basis.

For the purposes of this guidance, response time should be understood in line with the definition set out in Section 3.1 (Table 1 – Response times).

Companies should monitor their performance against these response times and use this information to identify areas for improvement. Where response times are not met or are not likely to be met, companies should ensure that customers are kept informed, including explaining the reason for delay and providing updated expectations.

Prompt attendance forms the first stage of a wider resolution process. Companies should ensure that customers understand how initial responses link to subsequent stages of resolution and should remain responsible for supporting customers throughout the incident until resolution is achieved.

Consultation questions

8. Do you agree with our proposal for introducing a minimum expectation relating to response times and transparency?
9. Are there any further considerations, evidence or practical examples you would highlight? For example:
   - Do you consider the proposed benchmarks and prioritisation approach are appropriate and achievable in practice?

- Are there any implementation challenges or unintended consequences associated with the proposed approach?

Minimum expectation 5: Companies should provide and clearly communicate a minimum clean-up service following sewer flooding incidents. Companies should ensure that customers understand what clean-up support will be provided, what is excluded, when clean-up is expected to begin, and the timescales within which support is expected to be delivered.

Effective clean-up is a critical component of the overall response to sewer flooding incidents, particularly where customers' homes or properties have been directly affected. Timely and well-delivered clean-up can significantly reduce disruption and support the restoration of normal living conditions.

Companies should have arrangements in place to ensure that clean-up can begin as soon as reasonably practicable following initial attendance. Companies should clearly set out what clean-up support is available, including what activities will be undertaken and what is excluded from clean-ups, when these are expected to commence, and indicative timescales for completion. This information should be communicated when companies attend an incident, and through any case manager.

As a minimum, clean-up services should include the removal of sewage and contamination, cleaning and disinfection of affected areas, and restoring affected properties to a condition that is safe and reasonably habitable, in line with the definition set out in Section 3.1 (Table 1 – Clean-ups (minimum service).

Clean-up services should be delivered consistently and in a manner that reflects the scale and impact of the incident. Companies should communicate clearly with customers about the timing and delivery of clean-up services and keep customers informed where delays occur.

Where customers choose to make alternative arrangements, companies should provide clear information on the available options and any further support available from the company, in line with the expectations in this guidance.

Companies should use customer feedback and operational experience to improve the consistency and effectiveness of clean-up services over time.

Consultation questions

10. Do you agree with our proposal to introduce a minimum expectation relating to clean-up support and transparency?
11. Are there any further considerations, evidence or practical examples you would highlight? For example:

- Are the expectations sufficiently clear on timing, scope and communication of clean-up services?
- Are there additional factors (for example, interaction with insurance or third-party providers) that should be more explicitly addressed?

3.4. Support for customers at high risk of harm, including repeat incidents

Minimum expectation 6: Companies should proactively identify customers at high risk of harm[4]

Every sewer flooding incident is different, and some customers may experience a particularly high impact from an incident, causing them to be at a heightened risk of harm if they receive a poor or limited service. Companies can mitigate the risk of harm through the appropriate provision of tailored additional support. This may include those who experience particularly severe, complex, longstanding and/or repeated incidents, as well as those who have financial and/or non-financial extra help needs. We expect companies to take steps to identify customers at high risk of harm using the definition below (also set out in Section 3.1, Table 1 – Customers at high risk of harm) and the framework below. Companies should understand the individual needs of their customers and minimise the risk of harm through the provision of appropriate tailored support. Companies should provide training for field operatives and call handlers to identify whether a customer is at high risk of harm. They should also put in place the means to record this on their account and track the overall number of these customers for use in assessing performance internally and reviewing individual cases.

For **customers at high risk of harm**, the impact of a sewer flooding incident, alongside their personal circumstances or the company's response, creates a heightened likelihood of substantial detriment to their health, wellbeing, financial situation, or ability to access or use their home.

In assessing whether a customer is at a high risk of harm, companies must consider as a minimum:

- Whether the flooding was internal or external and which parts of the customer's land or property the effluent entered;
- The duration and severity of the flooding;
- Whether the flooding restricted access to and / or use of the land or property;
- Whether the incident is a repeat incident (see Section 3.1, Table X – Repeat incidents) and / or caused by a longstanding issue and / or the company identifies that potential resolution or mitigation is complex;

[4] see section 3.1, Table 1 – Customers at high risk of harm

- Whether the customer or other occupants in the property have relevant extra help needs, or there are children under the age of 18 living in the property;
- Whether the customer has received a particularly poor service with respect to that sewer flooding incident;
- Any other relevant factors which may lead to a greater risk of harm for the customer resulting from the incident or the company's response to it.

Consultation questions

12. Do you agree with our proposal to introduce a minimum expectation relating to proactively identifying customers at high risk of harm?
13. Are there any further considerations, evidence or practical examples you would highlight? For example:
    - Do the framework and minimum factors provide sufficient clarity to support consistent application in practice?
    - Are there any practical challenges in implementing this approach, including in relation to data, systems or staff capability?

Minimum expectation 7: Companies should use a 5-year definition of repeat incidents for the purposes of tracking repeat incidents and determining the level of support provided to customers.

Customers who experience similar repeat incidents should expect to receive an appropriate level of support, irrespective of where they live within the company area, recognising the additional stress multiple incidents can cause.

Companies' PR24 performance commitments set out: "where a flooding event has occurred and flooding subsides, any subsequent flooding event at the same property shall be counted as a separate flooding incident. This shall be regardless of the time between events and if any investigation or follow on work has started or been completed." Where a new separate event occurs within five years, it should be classified as a repeat incident in line with the definition set out in Section 3.1 (Table 1 - Repeat incidents).

We expect companies to use the definition set out in Section 3.1 (Table 1 – Repeat incidents) when assessing whether customers are at high risk of harm and providing appropriate tailored support. We also expect companies to use this same definition when monitoring their performance in relation to the number of repeat incidents. This will ensure greater consistency between companies' internal performance targets and alignment with Ofwat's sector-wide reporting framework.

Companies should consider how their records of repeat registers can be designed in order to deliver benefits to customers experiencing repeat incidents, as well as to track performance. Records should be kept up to date and be accessible by different teams within the company so as to reduce the communication burden and the need for customers experiencing repeat incidents to repeat information. For example, a company's complaints handling team should be able to see whether customer has previously experienced an incident in order to deliver tailored engagement and assess whether they may be at high risk of harm.

Consultation questions

14. Do you agree with our proposal to introduce a minimum expectation relating to the use of a consistent definition of repeat incidents?
15. Are there any further considerations, evidence or practical examples you would highlight? For example:
    - Do you consider the proposed five-year timeframe is appropriate and proportionate?
    - Are there any practical challenges in applying this definition consistently across systems, performance management and reporting?

Minimum expectation 8: Companies should provide customers at high risk of harm with an appropriate level of tailored support that is designed to reduce the risk of potential harm

Sewer flooding is one of the most impactful service failures that customers experience. Where customers are at high risk of harm, companies should provide an appropriate level of additional support to avoid compounding negative impacts for these customers.

Given that there are many factors which influence the level of harm a customer may experience, companies should use a tailored approach that is supported by company-wide policies in determining the support that should be provided. For example, the support provided to a customer who has experienced repeated incidents may be different from the support provided to a customer who had a particularly severe one-off incident

The additional support measures set out below are our minimum expectations of what companies should provide to these customers. This list is non-exhaustive, and we expect companies' service offerings to exceed these minimum expectations.

- For customers experiencing repeat incidents or longstanding/complex issues which will take longer to resolve/mitigate, companies should aim to maintain a consistent single point of contact within the company where possible. At a minimum, this single point of contact should provide relevant, timely advice and information and regular, proactive updates on the progress of their case. They should signpost to relevant internal and external services and provide support and information in dealing with insurers if required.
- In line with companies' commitments in their vulnerability strategies and the expectations set out in our Service for all vulnerability guidance[5], companies should adapt their services to customers in line with any known extra help needs.

[5] Service for all vulnerability guidance - Ofwat

- Customers experiencing poor mental health following an incident, whether they have a prior mental health condition or not, should be provided with additional services and be signposted to places they can get specialist support.
- Customers experiencing particularly severe sewer flooding incidents should, where possible, be prioritised for initial response and/or clean up services as appropriate.
- Where sewer flooding restricts the use of a property, companies should provide alternative accommodation arrangements. Customers who are likely to experience high physical or mental health impacts from the presence of sewage in their homes should be prioritised for a cleanup where possible.

Consultation questions

16. Do you agree with our proposal to introduce a minimum expectation relating to providing tailored support to customers at high risk of harm?
17. Are there any further considerations, evidence or practical examples you would highlight? For example:
    - Do the examples of support provide sufficient clarity on the level and type of support expected?
    - Are there additional support measures or approaches that should be reflected to improve customer outcomes?

3.5. Governance & Learning

Minimum expectation 9: Companies should have governance arrangements that ensure that the customer impacts of sewer flooding incidents are appropriately considered, prioritised and scrutinised.

Sewer flooding is not a purely operational issue given the significant impact on customers and should be treated as a priority customer service issue. There should be clear senior ownership of customer outcomes alongside operational performance in relation to sewer flooding, and senior leaders should have sufficient visibility of incidents and be accountable for ensuring that appropriate action to mitigate customer harm is taken where performance falls short.

We expect companies to have efficient and effective structures in place for escalating live cases upwards to an appropriate level of seniority as required. This may include ongoing cases which are particularly complex, where a customer is at a particularly high risk of harm, or where particularly poor service has been provided up to that point. Escalation processes should support timely intervention, and decision making should account for the degree of harm or potential harm (accounting for the framework in minimum expectation 6) caused to the customer alongside operational considerations.

Companies should consider how their governance arrangements support:

- escalation of cases that need it;
- overall sewer flooding performance;
- lessons learnt reviews and follow on actions;
- the sewer flooding response policy and other relevant policies, such as complaints; and
- independent challenge and further insight to aid improvements in service and support.

Beyond escalations, companies should also regularly review individual cases to ensure their customers are receiving the right support in line with this guidance. Individual case reviews should account for the timeliness and quality of support (including responses and cleanups) and communication provided, including the additional measures in place for customers at high risk of harm,

Governance arrangements should include regular and structured oversight of performance beyond high-level operational metrics and include consideration of customer outcomes, including customer-focused metrics such as customer satisfaction and complaint volumes as well as customer insight from individual case reviews and escalations. Companies should use a range of information to inform this oversight, including operational data, individual case reviews and escalations, and customer feedback and insight, so that customer issues are identified and understood in context.

Companies should have a named individual or role who is accountable for its policies and approaches in relation to sewer flooding customer care. These policies should be reviewed regularly and updated with reference to relevant performance insights in a manner which seeks to improve customer outcomes, including for customers at high risk of harm.

Consultation questions

18. Do you agree with our proposal to introduce a minimum expectation relating to governance, accountability and oversight?
19. Are there any further considerations, evidence or practical examples you would highlight? For example:
    - Do the expectations strike the right balance between setting clear outcomes and allowing flexibility in governance structures?
    - Are there additional governance or escalation practices that would strengthen delivery against this expectation?

Minimum expectation 10: Companies should ensure learning from customer experiences is embedded with company processes and is applied in order to continuously improve customer outcomes

To support decision making which considers the customer, companies should embed insight from customer experience within governance processes. This includes systematically considering customer feedback, complaints and individual case reviews alongside operational performance data, and using this information to inform decision-making.

Governance arrangements should support a clear understanding of how incidents affect customers in practice, not only how they perform against internal measures.

Companies should ensure that governance supports learning and continuous improvement. This includes reviewing incidents, particularly those involving poor outcomes or repeat failures, and identifying lessons that can be applied to improve future performance. Companies should ensure that learning is embedded into and continuously improving its policies, processes and operational approaches, and that progress against improvements is monitored over time.

Companies should also ensure that appropriate assurance mechanisms are in place to provide confidence that policies and processes are being applied effectively in practice. This may include internal audit, independent review or other assurance activities, which should be used to test whether governance arrangements are delivering the intended outcomes.

Consultation questions

20. Do you agree with our proposal to introduce a minimum expectation relating to embedding learning and continuous improvement?
21. Are there any further considerations, evidence or practical examples you would highlight? For example:
    - Are the expectations sufficiently clear on how customer insight, complaints and case reviews should inform decision-making?
    - Are there additional assurance or monitoring mechanisms that would strengthen continuous improvement in practice?

4. Next steps

Our consultation closes on 21 September 2026. We will consider all responses to the consultation and publish our final guidance in Autumn 2026. Companies will be expected to take this guidance into consideration when reporting on their compliance with Licence Condition G (the customer-focused licence condition) through the Annual Performance Report process.

Appendix 1: Intended outcomes for customers experiencing sewer flooding

Table A1: Intended outcomes for customers in relation to sewer flooding.

Principles	Intended Outcomes
Communications	Customers will receive the right information at the right time before, during and after sewer flooding incidents occur. Companies will have clear and appropriate communications policies with which to achieve this. These may include, for example: •Proactive community engagement and education campaigns to prevent customer behaviours that cause sewer flooding, which are monitored for impact. • Accessible for all, multi-channel and regularly updated communication during incidents and through to resolution. • Clear incident communication plans for complex and / or large-scale sewer flooding incidents to enable the company to adapt and scale up where appropriate.
Providing appropriate support for customers when things go wrong and helping to put things right	Customers who experience sewer flooding will get the right support as quickly as is reasonably possible and will be informed how long it will take, and kept updated of any changes. To facilitate this, companies will have robust plans in place to ensure that average response times meet stretching but achievable targets.
	When customers experience repeat sewer flooding, they will be consistently supported through to the end of their customer journey through a single point of contact. Field operatives and call handlers will be able to identify repeat incidents at the point of logging the incident, for example through an automated repeat incident register, and provide appropriate advice and support.
	Customers that experience internal and/or external sewer flooding will get a clean-up which aims to restore their property to a suitable and liveable condition and is proportionate to the impact. Customers will be clearly informed of what they can be expect, and companies will deliver on this. Companies across the sector will have a clear and consistent approach to enable this.
	Customers will be assured that companies take the impact of sewer flooding seriously. To achieve this, companies will ensure effective governance structures are in place to oversee their policies and approaches, including clear accountability for the customer experience during sewer flooding. This includes how the company responds and resolves incidents from the customer

	perspective. There should be regular executive oversight of repeat sewer flooding incidents, taking into consideration the impact and experience of the customer.
	Customers will be made aware of the GSS and, for external sewer flooding, how to apply to receive a payment, and this process will be as simple as possible. Companies will be proactive in informing customers of their entitlement to GSS and making payments in line with the GSS regulations.
	Customers will be made aware of the financial support that is available to them and how to access it. To facilitate this, companies will provide clear guidance to staff on when and how any voluntary payments are made.
Understanding the needs of customers and providing appropriate support	Customers who experience sewer flooding will be assigned a dedicated case handler (or receive support from a dedicated case management team) from the point that the incident is logged, and where possible companies should strive to maintain consistent case handlers for repeat customers. Case handlers will provide support and timely updates through the full customer journey, be trained to identify and support customers who need extra help and signpost customers to relevant organisations.
	Customers who need extra help and experience sewer flooding will receive an inclusive service, in line with 'Service for All' vulnerability guidance and the commitments that companies made in their vulnerability strategies.
Learning and improving	Customers will be assured that companies are continuously improving their policies and approaches for sewer flooding. Companies will learn from past performance and customer experiences and identify opportunities to enhance service delivery. Companies should be able to demonstrate how customer feedback is informing future business decisions. These include: • insight from customer contacts and complaints • customer research and engagement • cross-company knowledge sharing • learning from others within the water sector, and other relevant stakeholders, including in other sectors.

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Ofwat
Centre City Tower
7 Hill Street
Birmingham B5 4UA
Phone: 0121 644 7500

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Any enquiries regarding this publication should be sent to mailbox@ofwat.gov.uk.