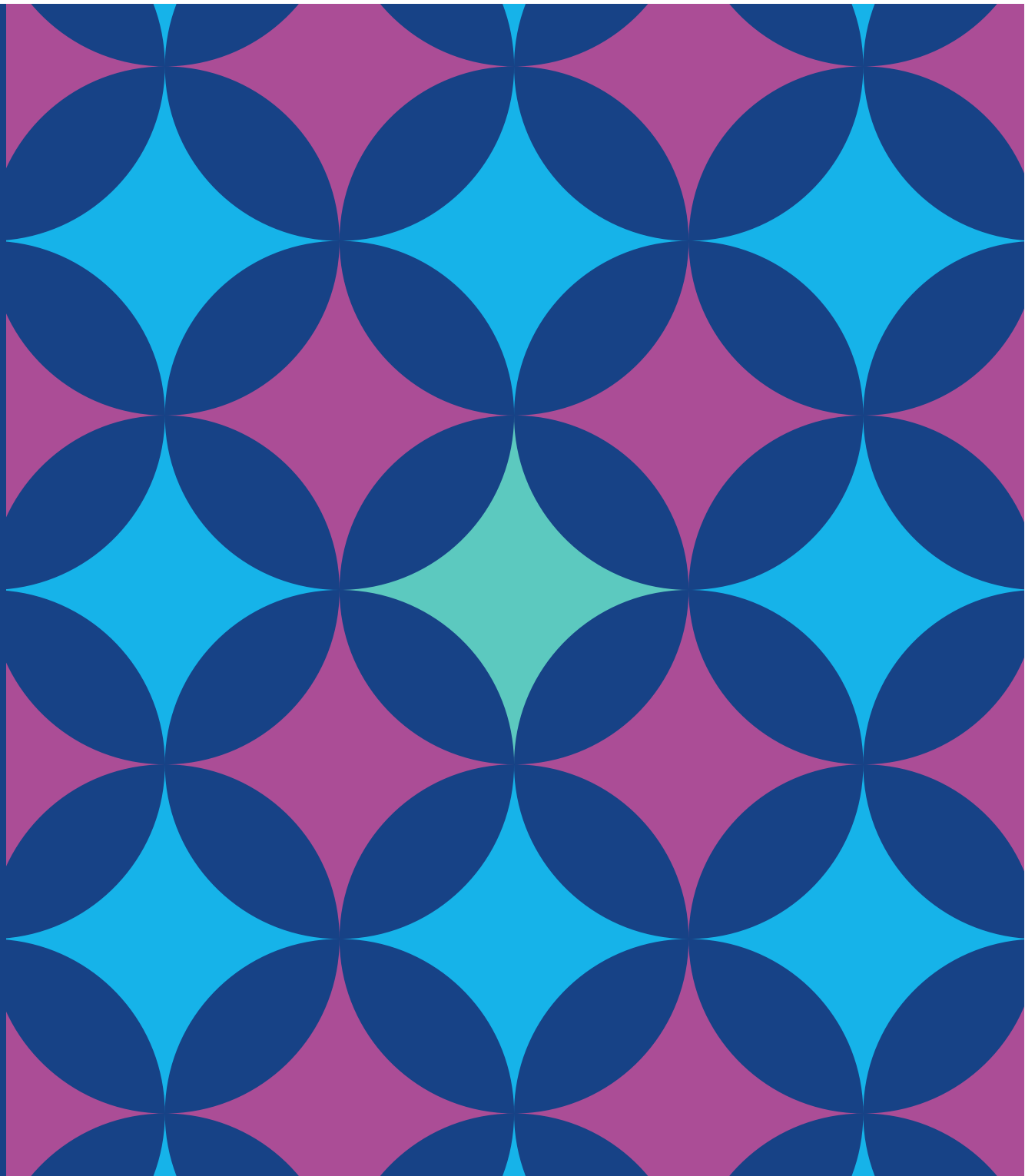


Emergency Contact Details

Good Practice Guide



Guide Summary

To provide standardisation in the sharing of data between Retailers and Wholesalers in relation to planned and unplanned events.

Recommended Practice

Further Reading

Types of User

This document has been deemed as a Water Retail Market Guidance or Good Practice Document by the Trading Parties involved in the Retailer Wholesaler Group (RWG). The document is designed to bring together in one simplified guidance/good practice document the different Wholesaler or Retailers Policies or Practices.

It is important to note that wholesaler or retailer policies and practices change from time to time and whilst effort is made to maintain the currency of this document if there is any doubt the current policy or practice should be checked with the relevant wholesaler or retailer.

This good practice guide relates to Part E of the Wholesale Contract Schedule 1, [Part 3: Operational Terms](#).



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Reviews of this document shall be undertaken by Wholesaler and Retailer representatives on the 12-month anniversary of the first publication of the document and periodically at not more than 24 months intervals following the first review. These Trading Parties may be part of the Retailer Wholesaler Group (RWG).

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Target audience: Retailers, including Self-Supply Licensees, and Wholesalers in the Water Market.

Objective

This document, authored by a sub-group of the RWG, is a supplementary working document to support the exchange of contact information between parties that may be used in planned or unplanned events. The document aims to provide additional practical guidance to ensure efficient and consistent application. The document is industry owned and maintained but held and published by MOSL.

Introduction

[CPW010: Emergency Contact Details](#) was a change proposal that provided a framework to support Trading Parties in relation to the continued safeguarding of non-household customers who may be vulnerable during unplanned events. A common industry approach was developed in order to share the details of non-household customers so that Wholesalers, who maintain statutory

responsibilities for water quality and the related public health of their users, can effectively and without delay communicate and issue messages and instructions during incidents impacting water supply to relevant non-household customers of the water supplied by the Wholesalers. The approach supported the continued good practice across the water sector to both household and non-household customers. Under the market codes, Retailers are obliged to support Wholesalers with communication during unplanned events on a reactive basis.

The provision of contact details that can be used to communicate with users in emergencies is one of a number of measures that will be deployed in the event of an unplanned change.

Automated and proactive messaging is now a standard approach across the English and Welsh water sectors and offers the quickest and most efficient method of getting information to users and allows for a rapid response while other traditional field-based measures are being mobilised.

During times of unplanned changes, especially those related to water quality issues, one single method is not solely relied upon. Each individual measure seeks to help mitigate risk. In addition to early warning proactive communications, other measures will continue to be utilised as appropriate to the circumstances.

It should also be noted that proactive communications can be deployed throughout an unplanned event in order to keep users informed. This document aims to provide guidance in the following areas:

1. Scenarios for the sharing of data
2. Good practice for data sharing: this includes the format in which data should be shared and the frequency of sharing
3. Collection of details
4. Minimum details that should be shared
5. Data subject, data security and privacy issues
6. Consideration for different types of customers

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1.0 Recommended Practice

1.1 In which Cases can Data be Shared?

The use of contact details is limited only to those scenarios which fall within Part E of the [Operational Terms](#). For clarity, these are listed below. However, it should be noted that the Operational Terms may change between revisions of this guidance and therefore the Operational Terms should always be consulted for the latest processes to which the sharing arrangements apply.

- Process E1** Sensitive Customers
- Process E2** Public Health related incidents
- Process E3** Unplanned changes to Water or Sewerage Services
- Process E4** Drinking Water Quality Events
- Process E5** Sewer Flooding and Public Health Risk such as pollution and unconsented Trade Effluent Discharges
- Process E6** Drought and dry weather water shortages
- Process E7** Emergencies (Civil emergencies or National Security Events).

1.2 Bilateral Agreements

The arrangements and good practice described in this document only apply to Wholesalers and Retailers who have entered bilateral agreements to share contact information. If these arrangements have not been mutually agreed, Retailers must still support Wholesalers in communicating with their NHH customers on Wholesaler request, as per the Operational Terms.

1.3 Good Practice for Data Sharing

Standardisation across the market of the format in which data is shared between parties, as well as the frequency of sharing, is beneficial for all market participants. This enables Trading Parties to process information quicker and focus on more value-adding activities, which will ultimately benefit end customers.

1.3.1 Data Format

To promote standardisation, Retailers should endeavour to share with Wholesalers the following emergency contact information on their non-household customers:

- 1) Retailer ID:** this should be the Retailer ID as registered in the Central Systems (CMOS).
- 2) Supply Point ID:** this should be the SPID as registered in CMOS, with the data item logical type UTF-8string(13).
 - Water and sewerage SPIDs with the same SPID core ('premises') should be treated separately, i.e. a water and sewerage SPID with the same end user telephone number should be counted as two records. This is because the water and sewerage Wholesalers may differ.
- 3) Telephone:** where multiple numbers are known, these should be provided in separate fields, as shown below, with data item logical type UTF-8string(32).
- 4) Email:** where multiple addresses are known, these should be provided in separate fields, as shown below.
- 5) Contact name:** where contacts are known, these should be provided in separate fields, as shown below.
- 6) Additional information:** this should include any further useful information that Wholesalers can use in planned and unplanned events. This should be limited to 100 characters.

Where the data is not shared through a Retailer portal, the contact information should be provided in Excel files through secure methods of transfer. In either case, the following headers are recommended:

| | | | | | | | | | | | | |
|-------------|------|-------|-------|-------|-------|---------|---------|---------|---------|----------------|----------------|-----------------|
| Retailer ID | SPID | Tel 1 | Tel 2 | Tel 3 | Tel 4 | Email 1 | Email 2 | Email 3 | Email 4 | Contact Name 1 | Contact Name 2 | Additional Info |
|-------------|------|-------|-------|-------|-------|---------|---------|---------|---------|----------------|----------------|-----------------|

All fields should be in text formats, to avoid leading zeros being dropped out of Wholesalers' systems. The email address fields should contain '@', should not contain spaces or any non-approved special characters. The Excel file that is shared should be titled using the following convention: 'Emergency_Contact_RetailerID'.

Often, Retailers are only able to obtain email address or only contact numbers. Retailers should endeavour to provide information where known and leave other columns empty. It is recommended that as a minimum, Retailer ID, SPID and either Tel 1 or Email 1 are provided. This increases the chances of customers being informed by Wholesalers of emergency events or incidents.

A template for sharing emergency contact details is provided in Attachment 1.

1.3.2 Minimum Frequency of Sharing

Ensuring contact details are kept up-to-date and relevant is crucial. As such, Retailers should follow these review frequencies, based on the number of SPIDs they share with a Wholesaler:

| Number of SPIDs | Frequency of Review |
|-----------------|---------------------|
| > 1,000 | Half-yearly |
| < 1,000 | Annually |

These frequencies ensure that emergency contact data held by Wholesalers does not become outdated too frequently, as changes to customer details can be captured with the timely sharing of files. This does not burden Retailers where only a small number of SPIDs are held for a particular Wholesaler, i.e. most Retailers will only need to share emergency contact information with most of their Wholesalers on an annual basis.

The frequencies above apply to details held for most customers. Trading Parties should ensure they adhere to arrangements in place for sensitive customers and health related site specific arrangements. These are outlined in Process E1 and Process E2 respectively in the Operational Terms. Sensitive customers are identified in CMOS through data item D2005, whilst health related site specific arrangements are highlighted through D2087 and D2093.

1.4 Collection of Details

The vast majority of contact details collected by Retailers is expected to be the regular site information during business hours. As there will be a number of users who operate out-of-hours contact arrangements and 24/7 operations, Retailers should endeavour to collect operational contact details where possible.

Retailers are encouraged to collect contact details for their customers organically, through usual customer management activity. They should also ensure that details are stored and maintained in line with data protection regularly and normal data management practices within their organisations. To avoid data becoming outdated, Retailers should maintain regular communication with their customers.

Trading Parties are expected to work together for the benefit of customers and should resolve issues in good faith, where possible.

1.5 Minimum Details

As a minimum Retailer ID, Supply Point ID and either a contact number or email address should be shared with a preference for mobile telephone number if available. All data that is shared is subject to individual Trading Parties compliance with prevailing Data Legislation.

1.6 Data Subject Rights Requests

The provisions detailed in section D of schedule 13 of the Market Arrangements Code should be followed when considering data subject rights request.

1.7 Data Security Measures

The provisions detailed in section E of Schedule 13 of the Market Arrangements Code should be followed when considering appropriate data security measures.

1.8 Privacy Notices

The contact details detailed under the sharing arrangements constitute Market Personal Data. Trading Parties are expected to have privacy notices that are consistent with the market privacy notice. The market privacy notice can be found [here](#). Further guidance is given in section C of the Market Arrangements Code.

2.0 Types of User

Whilst the ideal extent of data sharing would be for all NHH customers the RWG recognises that this may not be feasible for all Retailers. With this in mind, the following categories of customers have been considered. It is expected that Trading Parties will specify which type of user details will be shared in the bilateral agreements between each other.

A) Large Users who are sensitive to changes/interruptions to services

- a. Likely to have 24 hr operations
- b. Likely to have specific engineering team
- c. Have sensitivity to changes to quality standards
- d. Any non-standard arrangements or agreements

B) Other business who have a high dependency on changes in services

- a. Schools, Care Homes
- b. Food manufacturing
- c. Farms with livestock

C) All other non-household end users

- a. Shops, Restaurant etc

3.0 Further Reading

This good practice guide incorporates the initial proposal in [CPW110: 'Sharing Non-Household Emergency Contact Details'](#).

In June 2020, the RWG Planned and Unplanned Events Sub-group revised a [good practice guide for unplanned events and incidents](#).

In March 2021, Ofwat approved [CPM033: 'Improved process for managing Data Subject Rights Requests'](#), which was a change proposal raised by the GDPR Issues Committee. The change amended the process for handling Data Subject Rights Requests in Schedule 13 of the Market Arrangements Code, in order to facilitate compliance with obligations and timeframes set out in the GDPR and Data Protection Act 2018.