

# Emergency Contact Details Guidance Document

## v1.0

### 1. Introduction

#### 1.1 Purpose of this document

This document is designed to be a supplementary working document to support the exchange of contact information that may be used in unplanned events or incidents between parties as per CPW010. 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.

#### 1.2 Reviewing this document

Reviews to 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.

#### 1.3 Overview

The CPW10 change proposal seeks to provide a framework that supports Trading Parties relating to continued safeguarding of non-household customers who may be vulnerable during unplanned events; a common industry approach has been developed in order to share the details of non-household customers so that the Wholesaler, who maintains statutory responsibility for its water quality and the related public health of its 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 Wholesaler. The approach supports the continued best practice across the water sector to both household and non-household customers. Under the code 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 that will be deployed in the event of an unplanned change. Automated and proactive messaging has now become a standard approach across the English and Welsh Water Sector 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.

The document covers

- Practical Guidance for the effective operation of sharing contact details

## 2. Recommended Practice

### 2.1 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).

### 2.2 Bilateral agreements

The arrangements and best 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 then Retailers are still expected to support Wholesalers in communicating with its NHH customers on Wholesaler request as per the Operational Terms.

### 2.3 Collection of details

The vast majority of contact details are expected to be the regular nine to five business details. There will be a number of users who operate out of hours contact arrangements and 24/7 operations. In general Retailers will collect contact details on normal business as usual contact activity and will make a reasonable effort to ensure that details are correct in line with normal data management practices within their organisations.

Trading Parties are expected to work together for the benefit of the user and will resolve any issues in good faith.

### 2.5 Minimum Details

As a minimum Supply Point ID and Contact Number should be shared with a preference for mobile telephone number if available. Parties may wish to share additional data at their discretion. Any additional data that is shared will be covered under arrangements between the relevant parties. All data that is shared is subject to individual Trading Parties compliance with prevailing Data Legislation.

### 2.6 Data Considerations

Trading Parties should conform to the following data standards when sharing contact information;

- SPID - with the data item logical type UTF-8string(13)
- Telephone Number - with data item logical type UTF-8string(32)
- Water and Sewerage SPIDs with the same SPID core should be treated separately i.e. A water and sewerage SPID with the same end user telephone number should be counted as two records.

## 2.7 Update Frequency

Contact details should be updated on at least an annual basis. For the avoidance of doubt, more frequent arrangements can be mutually agreed by both parties.

## 2.8 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.

## 2.9 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.

## 2.10 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.

## 3.Types of User

Whilst the ideal extent of data sharing would be for all NHH customers the CPW010 working group recognise that this may not be feasible for all Retailers. With this in mind the following categories of customer 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. The categories are given below;

- 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

## 5. Further Reading

Further information on the CPW010 – Emergency Contact Details change can be found on the MOSL website [here](#).

Further information on CPW029 and CPM008 – GDPR and Data Protection Provisions Updates can be found [here](#).