



# PORTSMOUTH WATER LIMITED

Vulnerability Strategy 2024

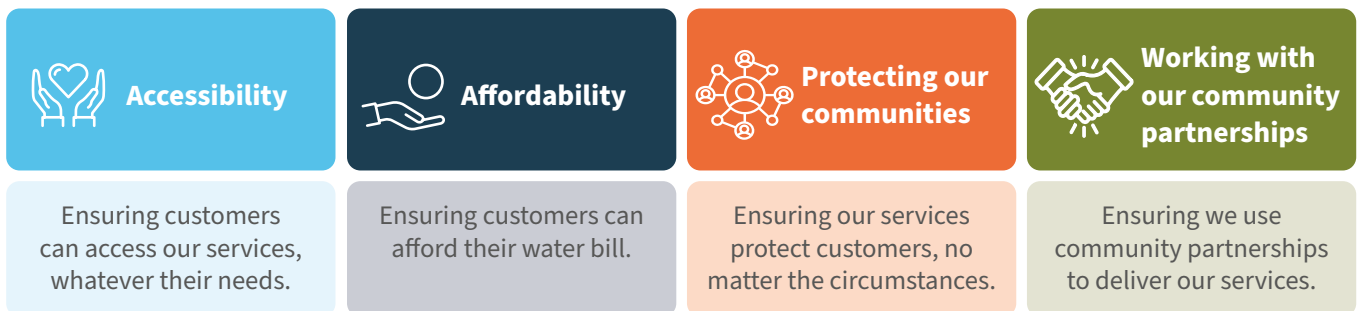
# CONTINUING TO SUPPORT OUR CUSTOMERS

At Portsmouth Water, our commitment to customer centricity is at the heart of everything we do. We recognise that some of our customers may need extra help, and we are dedicated to being there for them every step of the way. Our Vulnerability Strategy is a testament to this commitment, ensuring that accessibility, affordability, and our communities are prioritised. We believe in the power of collaboration with our community partners to support and uplift those who need it most. This strategy outlines our ongoing efforts to enhance support for vulnerable customers and reaffirms our pledge to provide exceptional care and service.

We have been committed to supporting our customers in vulnerable circumstances and this is recognised in our company vision. We also ensured that when we published our most recent Business Plan submission, and submitted it to Ofwat, that our approach to vulnerable customers, including those who are struggling financially, was a key element of our plan.

This document sets out our vulnerability strategy along with some of the details to how we intend to continue enhancing our commitment for the next 5 years.

## We will support our customer in four key ways:



This strategy is published in draft, and over the following year, we will engage with the community, local & national stakeholders, and our customers to gather feedback and suggestions. This collaborative approach will help us refine the strategy to ensure it meets the evolving needs of our customers and communities. The final strategy will be published in June 2025.

Our timeline for full publication is as follows:



Making our strategy visible to everyone is important to us as we want to be transparent in our plans. We look forward to continuing to support our customers in the most effective way possible and learning how we can continue to improve.

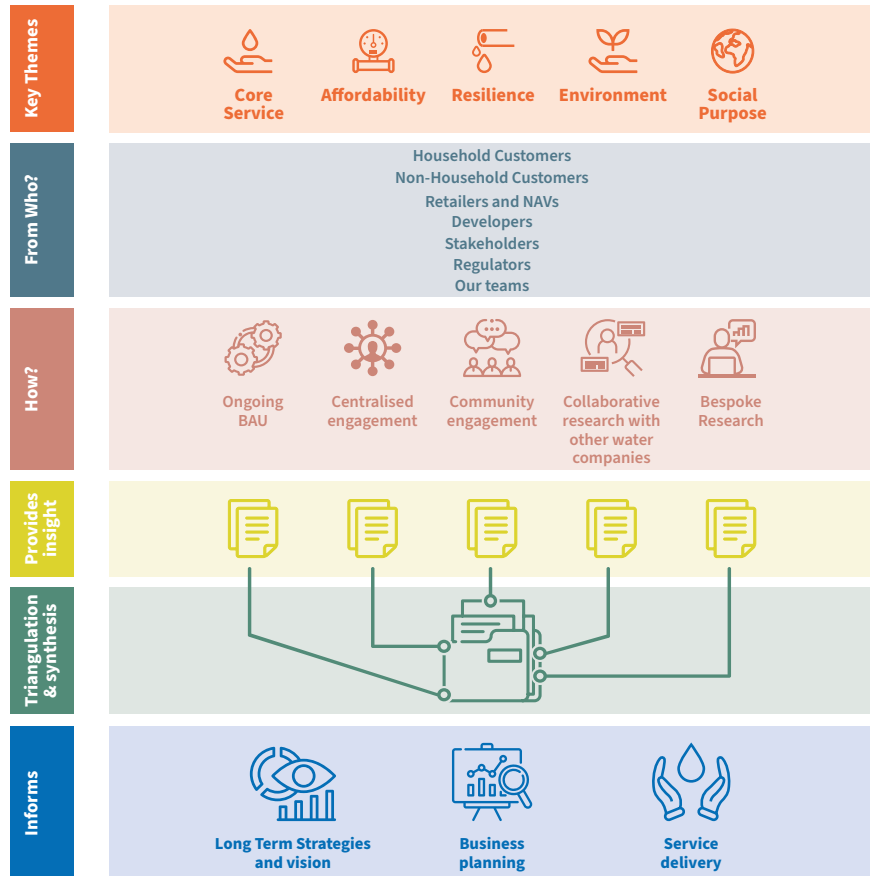
If you wish to make any comments about this strategy, then please don't hesitate in contacting me at [matthew.hamilton@portsmouthwater.co.uk](mailto:matthew.hamilton@portsmouthwater.co.uk)

**Matthew Hamilton**  
**Chief Customer Officer**

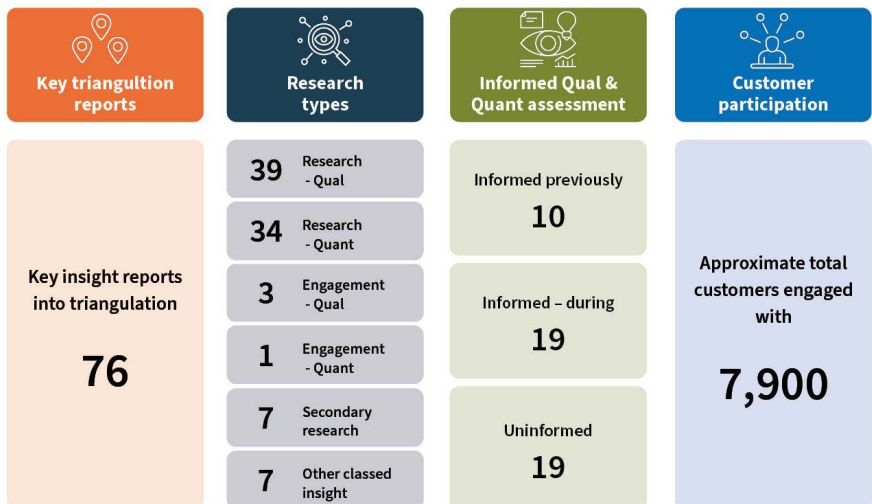
# WHAT HAS INFORMED OUR STRATEGY SO FAR?

Our current engagement strategy has helped us to better understand the needs of the communities we deliver for, and this approach will support our ongoing engagement over the coming year on our strategy and delivery plans.

In recent years, we have actively engaged with our customers through a comprehensive framework designed to gather input from a wide range of stakeholders within our core delivery areas.



To inform our Business Plan submission to the regulator, we conducted extensive conversations using customer surveys and focus groups. These provided us with key data on how we should focus and deliver our services. Our high-level research, which included both vulnerability and affordability considerations, engaged with 7,900 customers.



**We have enhanced our engagement approach to include broader horizon scanning across several key areas, including:**

- External region-specific data - For example, ONS data on deprivation or disability.
- External research and insight studies – Typically, this is national data analysis and research on relevant topics on a larger scale, often national but includes other water companies and sectors including third sector.
- Research commissioned by Portsmouth Water - Surveys and research with our customers including affordability, bill plan choices and smart metering research.
- Stakeholder research - Surveys and conversations with our local or national stakeholders.
- Data from regulatory organisations (Ofwat CCW, Ofgem, UKRN and UKWIR) – Insight provided from industry comparative measures in both water and the wider energy sector.
- Our own knowledge base and experience – utilising what our specialists in the Community Team have learnt from our stakeholders and our own customer data.

**What do we know about our communities?**



## SECTION 1 - AFFORDABILITY

We are maintaining a consistent approach to deliver the lowest water industry bill in the industry and avoiding customers falling into debt by providing them with the tools and access to partners that can provide them with support.

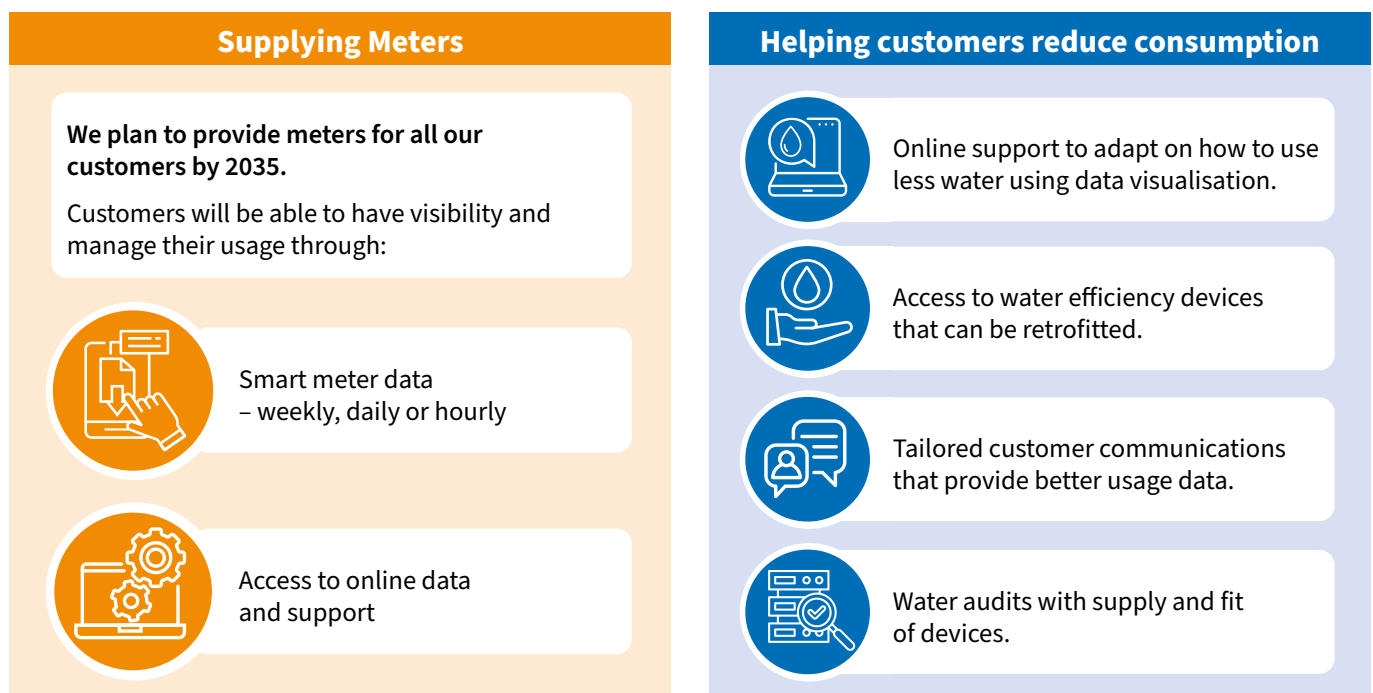
To support our customers in Water Poverty, or just struggling to pay, we have developed our support to reduce charges using the key approaches.



### Reducing Usage

As we are becoming a water stress area, we will need to convert the 70% unmetered customers to have a meter installed. This provides the capability to reduce costs by reducing usage and to support this we will:

- Install smart meters across household properties to give real time usage data to support customers understanding
- Communicate with our customers with useful messaging about their usage



## Maintaining our low debt position

With the cost of living, energy, food, and travel prices impacting many of our customers, we have done everything we can to avoid increasing our bills and have aimed to maintain our position of offering the lowest water bills in England. Additionally, we are committed to maintaining a low debt position to further support our customers' financial wellbeing.

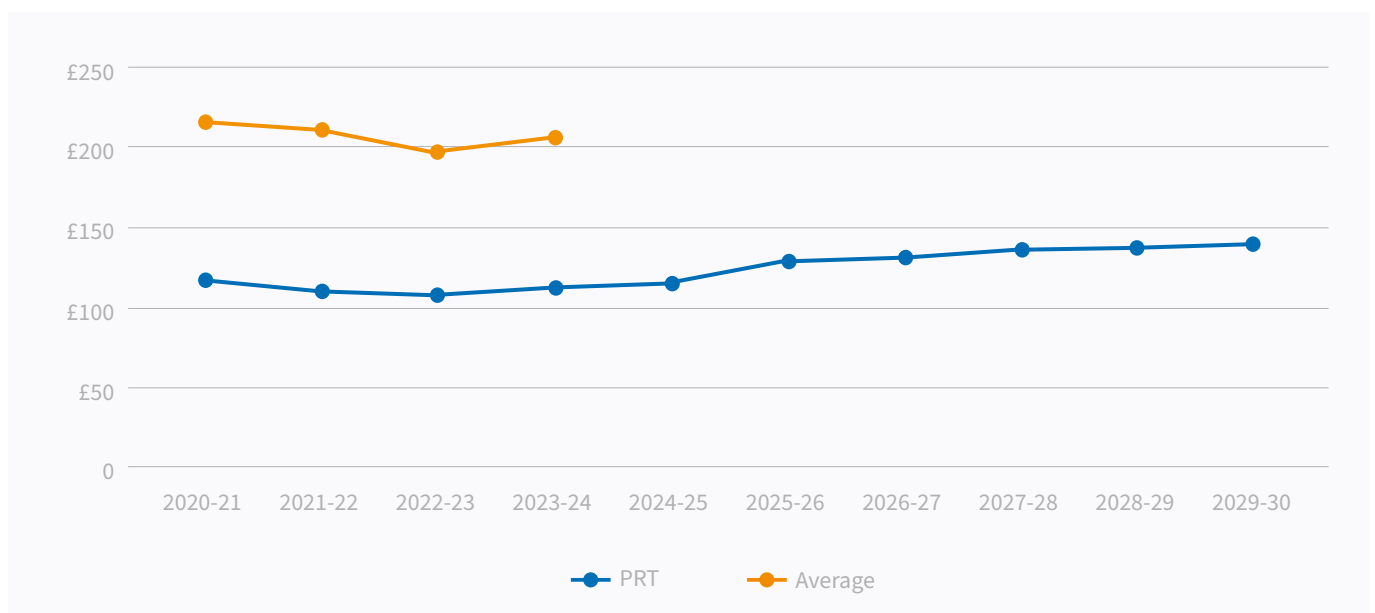
We will keep our bills low by:

- Being efficient in how we work
- Identifying where we can use more efficient long term nature based solutions which may be cheaper in the longer term

Our approach has ensured the delivery of affordable bills for the future while maintaining a low debt position. We expect to remain below other water company bills for the same service.

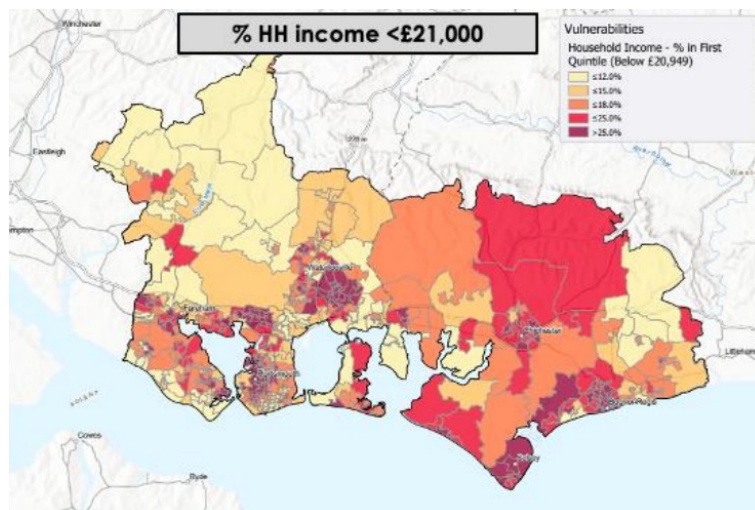
We have already been delivering this and you can see how we have performed below:

### AVERAGE WATER BILLS



## Adapting Financial Support

We already know that 63,000 properties in our region have a household income below £21,000 (making them potentially eligible for our affordability tariffs)

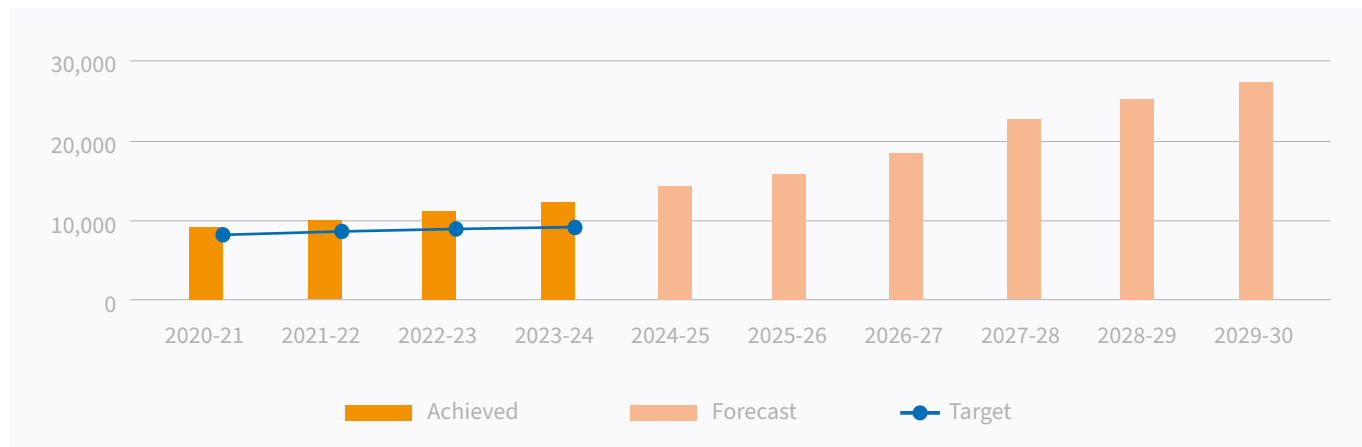


### (i) We will continue to provide customers affordability tariffs.

**1 Low income Social Tariffs** – A tariff that reduces customers bills whether unmetered or meter. Our push on promoting this tariff means that we supporting 13,532 properties by March 2024.

We will continue to promote our Social Tariff to support those on low incomes. Today we support 13,532 households which is above our forecast targets. By 2030 we will have doubled our support to 27,500 households.

#### AFFORDABILITY (SOCIAL TARIFF)



**2 WaterSure Tariff** – A tariff that reduces customers bills who have medical conditions or disabilities that use increased water and are on a meter. We will aim to increase this to 500 customers. Whilst this may seem low, many eligible customers are also eligible for our Social Tariff and under our best tariff approach they are placed on that as a tariff preference.

(ii) **Innovative tariffs** are likely to become an ongoing aspect of water charges moving forward and we want to ensure that we build in protection for our customers in vulnerable circumstances.

We will ensure that any of our tariffs are inclusive by design and do not exclude vulnerable customers from participating in water efficiency incentive opportunities.

## Using data to increase reach

We want to try and help as many of our eligible customers as possible and we will focus on how we can work with 3rd parties who can help to identify those customers who are likely to be eligible for our tariffs but not currently receiving them.

Our approach focuses on working with a number of partners:

### (a) Local Councils in our community

We already work with councils such as Portsmouth City Council but will be looking to extend this work to how we can share data to benefit our joint customers. We plan to:

**Establish local council data shares to tell us who may be eligible for our support tariffs**

The Digital Economy Act allows us to share data between local authorities and councils on who is eligible for support – this means we can simply transfer customers onto the best tariff for them.

We will approach all relevant councils to set up a data share agreement.

**Work with Department of Work and Pensions to help establish eligible customers**

Joining the industry data share scheme with DWP enables us to identify and target customers who may be eligible, as they provide indicators for low income or benefits.

**Exploring cross-sector data sharing**

We have already implemented data sharing for customer information on the PSR.

Moving forward, we aim to collaborate more closely with the energy sector to achieve the following objectives:

- Connecting water and energy usage patterns for customers
- Identifying individuals facing genuine hardship
- Providing valuable insights into our communities

**Working with the Social Housing Sector**

Social Housing Providers we know have a closer relationship with their tenants who are also our customers. They are well placed to better understand the financial position of our customers to flag with us eligibility for schemes.



## Supporting customers to reduce their usage and charges

We already know that 63,000 properties in our region have a household income below £21,000 (making them potentially eligible for our affordability tariffs)

**Using Smart Meter data** - We want to develop our relationship with customers through access to data and information relating to their usage and how it can support those customers with affordability issues including:

- a. Provide monthly digital billing – This will help customers budget and ensure that they do not fall into arrears.
- b. Support usage change – Through better messaging will be able to support our customers to better understand the cost impact of usage.
- c. Ability to provide real time support on what customers should be paying (avoiding unnecessary credits and charges).
- d. Ensuring that customers who are at risk are not 'self disconnecting' through stopping usage of an essential product.

**Free water efficiency devices** – We will actively promote and provide retrofit devices to help customers reduce usage and costs.

**Data sharing through Digital Economy Act** – This means we can partner with organisations that may help us provide support to customers to reduce usage.

**Leak repairs and allowances for vulnerable customers** – recognising the anxiety that can be caused by leaks we will look to support customers with support in repairs and allowances.

## SECTION 2 - ACCESSIBILITY

Ensuring our customers are well informed about our services and can easily access them is a top priority for Portsmouth Water. Our strategy to achieve this goal involves several key actions:



### Communicating with us

**Channel Choice** – Develop new channels for our customers, providing them with a variety of options while ensuring that traditional channels remain open and deliver the same high level of service. We acknowledge that, for some customers, ‘paper’ communication is the best option, and we will continue to make it available.

**Easy to access digital channels** – We will make sure that our digital platforms are built inclusive by design meeting the Web Content Accessibility Guidelines.

**Be aware of Data Poverty** – Recognising the challenge of data poverty for our customers we will reduce the impact of our digital channels on data usage for our customers where we are able to.

**Working to high standards** – To improve overall accessibility, we will implement and design our services according to the principles outlined in the BSI ISO 22458 quality standard for inclusive services.

### Identifying those who need our support

We will expand our data sharing opportunities to connect with customers who may be unaware of their eligibility. We will increase our partnerships to include:



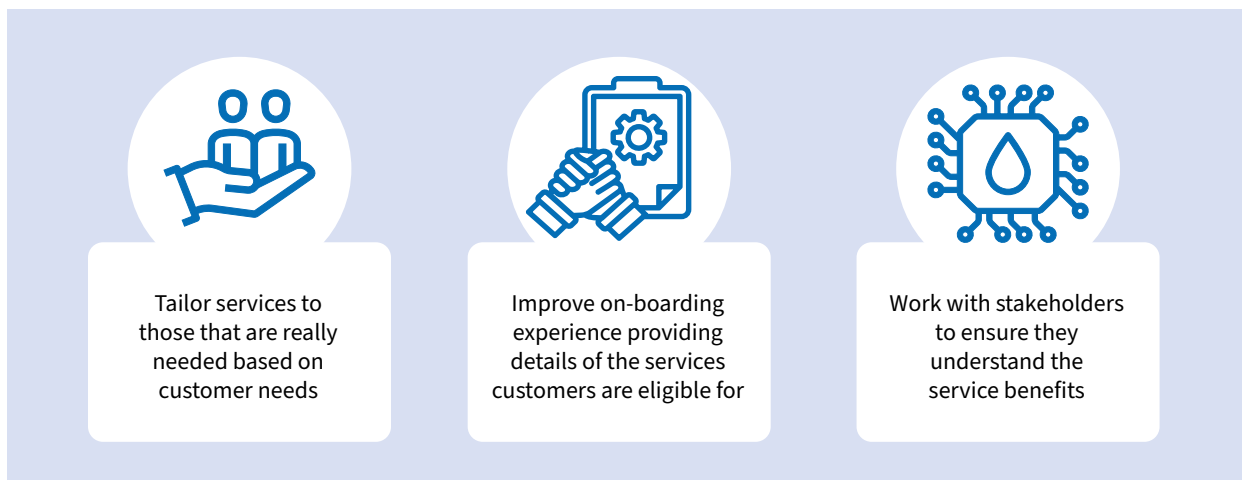
These organisations, among others, can help us identify and support customers in need, enabling us to reach a much broader audience, including those who are most isolated.

## Using our water efficiency devices

We recognise that not everyone has the skills or means to undertake DIY projects, and many cannot afford non-essential home improvements. To support our vulnerable customers, we plan to provide in-home water efficiency audits and install appropriate retrofit efficiency devices. Our goal is to ensure that everyone can contribute to water conservation.

## Understand support

Customers rarely need to take advantage of the services that we offer, so its easy for them to forget how we will protect them when something goes wrong. To help customers understand we will:



## Us going to customers, not customers coming to us!

We will review the efforts of our community-based teams, who will continue in engaging with our communities to promote our initiatives, enrol customers in support programs, and communicate the ways in which we can offer assistance.

## Keep the message simple

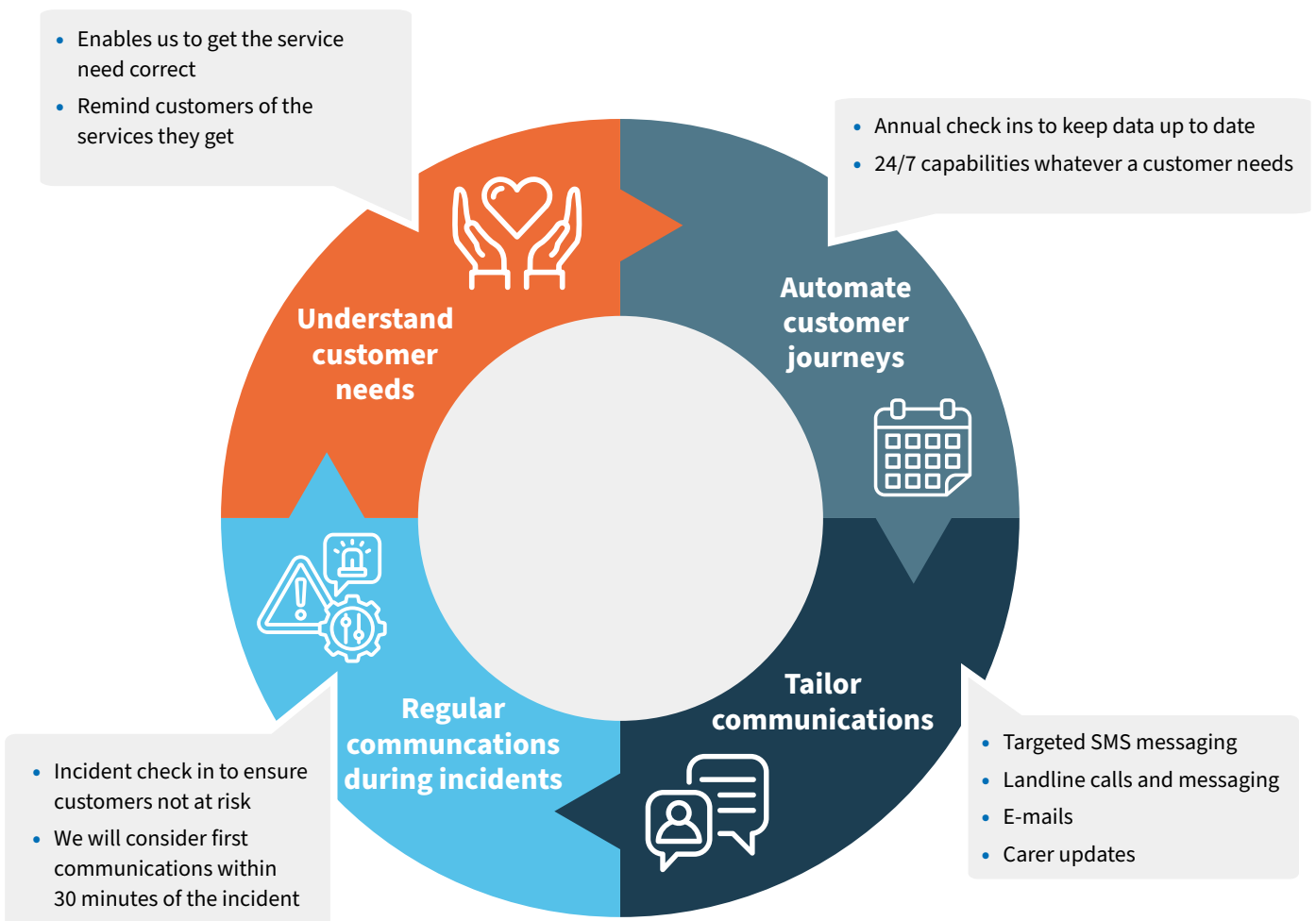
We will look at making our customer promotion of schemes really easy to understand. This will be done through:

- Avoiding technical talk
- Work with external stakeholders to improve our approach
- Make our customer bills and communications inclusive by design

## SECTION 3 - PROTECTING OUR COMMUNITIES

### Communications when something has gone wrong

During the rare occasions that our customers experience water supply disruptions, we recognise those in vulnerable circumstances may feel heightened anxiety and be more severely impacted than our typical customers. To minimise these impacts, we aim to implement customer journeys that deliver in several key ways:



### Developing regional insight to help us manage risks

#### (i) Identify potential hotspot regions

By understanding regions with higher levels of deprivation or significant elderly populations, we can better respond to incidents occurring in those areas. While we may not initially know who is at risk at the onset of an incident, our preparedness enables us to identify these customers promptly and provide necessary support.

#### (ii) Provision of bottled water

We will prioritise delivering bottled water based on risk, particularly to those who may struggle to collect it themselves or lack adequate support.

Moving forward with our new customer applications, we will identify customers who would require overnight support. Additionally, we will proactively provide standby assistance when customers notify us of their overnight support needs.

## SECTION 4 - WORKING WITH OUR PARTNERS

Further developing an understanding of stakeholder is crucial for supporting our customers through those partnerships.

We plan to focus on working with partners in the 3 areas of:



We are committing to increasing our partnership relationships and approach:

Increasing our partnerships

Engage with regulator on key initiatives to ensure communities get best value

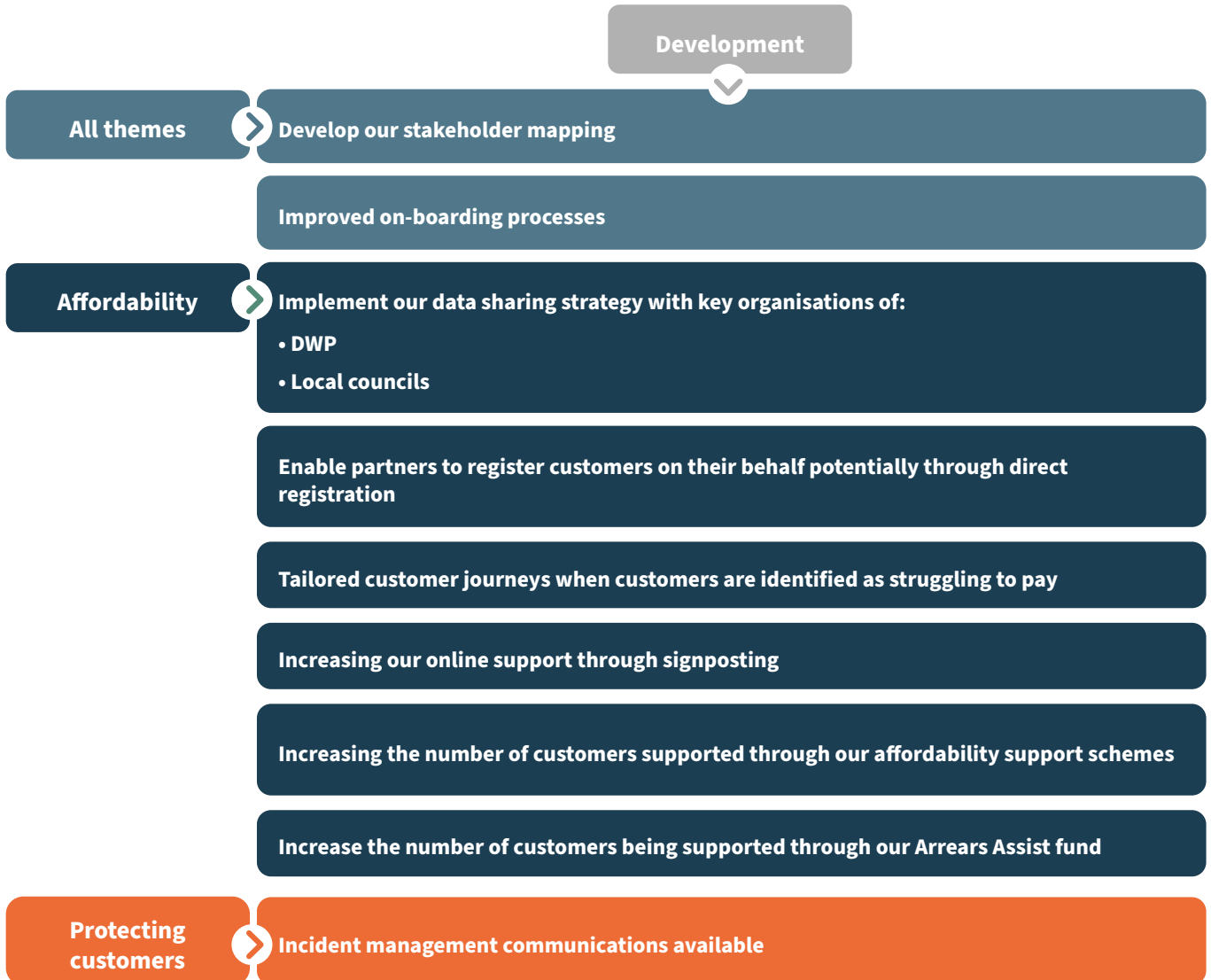
Work with local initiatives like warm spaces to connect with communities

Enable partners to act for our customers

## SECTION 5 - CONTINUING TO IMPROVE SERVICES

We are committing to an ongoing roadmap of improvements categorised into short-term and long-term (2 year +) initiatives.

### SHORT TERM INITIATIVES (NEXT 24 MONTHS)



LONG TERM INITIATIVES (24 MONTHS+)

Development



## SECTION 6 - HOW WE WILL MEASURE SUCCESS

Ensuring a strong target exists for our activities is key and we have set the following measures:

Measure	2025-26	2026-27	2027-28	2028-29	2029-30
<b>Households on PSR</b>	12.5%	13%	13.5%	14%	14.5%
<b>PSR data revalidation attempted contacts</b>	90%	90%	90%	90%	90%
<b>PSR data revalidation actual contacts</b>	35%	35%	35%	35%	35%
<b>Households on Social Tariff</b>	16,000	19,000	22,000	25,000	27,500
<b>Stakeholder satisfaction of vulnerable services</b>	71%	73%	75%	75%	75%
<b>Customer satisfaction of those on Affordability Tariffs</b>	+1% improvement from 2024-25	+1% of previous year	+1% of previous year	+1% of previous year	+1% of previous year
<b>Customer satisfaction of those on PSR Tariffs</b>	+1% improvement from 2024-25	+1% of previous year	+1% of previous year	+1% of previous year	+1% of previous year



No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
1.1	<b>Companies should adapt their services to customers in line with any known extra help needs. This is especially important during times where there is increased risk of harm; for example, during incidents.</b>	Compliant	<p>1. Accessible Communication: We provide multiple channels for communication, including phone, email, live chat and social media, ensuring accessibility for all customers, including those with disabilities.</p> <p>2. Pro-active Outreach: Identify vulnerable customers, such as the elderly or those with medical conditions, and establish pro-active outreach programmes to ensure we are supporting them at all times, particularly during an incident. This is an area that we propose to keep on improving on through ongoing stakeholder mapping and development of partnerships.</p> <p>3. PSR Assistance: Offer priority assistance for customers on our priority service register, ensuring they receive timely support and information during emergencies.</p> <p>4. Clear Information: Provide clear and concise information about potential risks and protective measures through easily understandable communication channels, such as leaflets, websites, and community meetings. As part of our short term improvement plan we will be introducing increased emergency communications by email, landlines and SMS based on customer tailored journeys. Additionally we will be improving our PSR onboarding letters to ensure customers understand the service we will provide to them based on their individual needs.</p> <p>5. Alternative Service Options: Robust contingency plans in place to provide alternative water supply options, such as bottled water distribution, in case of service disruptions.</p> <p>6. Collaboration with Community Organisations: Partner with local community organisations, such as local councils, housing associations and citizens advice, to ensure coordinated support for vulnerable customers, whilst opening our reach to customers.</p> <p>7. Training for Staff: Equip staff with training on handling queries and requests for customers that need extra help, with a focus on empathy, effective communication and hand-off to third parties.</p>	<p>1. Accessible Communication: Regularly review data &amp; insights around usage and customer feedback to assess the effectiveness and accessibility of communication channels, including phone, email, live chat, and social media. Implement necessary adjustments based on feedback. Monitor customer surveys to identify PSR customers C-SAT compared to typical customers.</p> <p>2. Pro-active Outreach: Track engagement levels of outreach programs and responsiveness during incidents. Monitor the number of vulnerable customers identified and supported through partnerships and directly. Review and assess annually stakeholder mapping with the development of a maturity assessment view of this activity to ensure ongoing development of this activity and tracking.</p> <p>3. PSR Assistance: Monitor response times and support effectiveness provided to Priority Service Register (PSR) customers. Conduct regular surveys to gauge customer satisfaction.</p> <p>4. Clear Information: Collect feedback from customers on the clarity and usefulness of information provided through leaflets, websites, and community meetings. Adjust content and delivery methods as necessary.</p> <p>5. Alternative Service Options: Test annually our contingency plans through regular incident events simulations. Evaluate the effectiveness and readiness of alternative service options during actual incidents.</p> <p>6. Collaboration with Community Organisations: Track collaborative efforts and their impact on customer support with local community organisations. Monitor the breadth and effectiveness of our outreach efforts through these partnerships.</p> <p>7. Training for Staff: Evaluate training programs through regular assessments and feedback from both staff and customers. Measure improvements in customer interactions and resolution effectiveness.</p>	<p>1. Data Privacy and Security: Ensuring customer sensitive data, particularly for vulnerable individuals, is securely managed and protected from breaches or unauthorized access.</p> <p>2. Identification of Vulnerable Customers: Accurately identifying all vulnerable customers, especially those who may not self-identify or are not easily reachable, can be challenging.</p> <p>3. Resource Allocation: Adequately allocating resources, to support proactive outreach and other initiatives without compromising other essential services.</p> <p>4. Technology Integration: Integrating new technologies for communication and data management with existing systems might present technical and operational challenges.</p> <p>5. Training and Retention: Continuously training staff to handle sensitive situations with empathy and efficiency, while also retaining skilled employees who are well-versed in dealing with vulnerable customers.</p> <p>6. Customer Engagement: Ensuring high levels of engagement from customers, particularly in remote or underserved areas, to provide them with the necessary information and support.</p> <p>7. Coordination with Community Partners: Effectively coordinating with multiple community organisations to provide seamless support and avoid duplications or gaps in service.</p> <p>8. Emergency Preparedness: Maintaining a high level of preparedness for emergencies, ensuring that contingency plans are regularly updated and tested.</p> <p>9. Financial Constraints: Balancing the cost of implementing and maintaining these initiatives with the company's financial health and budgetary constraints.</p> <p>10. Customer Awareness: Ensuring that customers are aware of the available support services and understand how to access them, especially in times of need.</p>	<p>(1) PSR Targets are set as % of household properties: 2024-25 - 12% 2025-26 - 12.5% 2026-27 - 13% 2027-28 - 13.5% 2028-29 - 14% 2029-30 - 14.5%</p> <p>(2) Customer Satisfaction of customers on PSR and Affordability Support - to be now lower than typical customers.</p> <p>(3) Satisfaction of vulnerability stakeholders: 2024-25 - 71% 2025-26 - 71% 2026-27 - 73% 2027-28 - 75% 2028-29 - 75% 2029-30 - 75%</p> <p>(4) Annual incident event simulation - 1 per year</p> <p>(5) Stakeholder mapping: - increasing number of stakeholders annually (to 2030) - maturity assessment score improvement annually (to 2030)</p>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
1.2	<b>Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.</b>	Compliant	<p>1. Simplified Information: Use of plain language and avoid technical jargon when describing support options. Breakdown complex concepts into easily digestible chunks to ensure customers can grasp the information easily.</p> <p>2. Visual Aids: Incorporation of visual aids on key communications, specifically bills, to supplement textual information. Review of all customer facing documents with annual improvements commencing 2025.</p> <p>3. Step-by-Step Guidance: Offer step-by-step guidance on how customers can access support, including clear instructions on who to contact, what information to provide, and what to expect during the process. We will also develop a vulnerability hub as part of our digital platform as part of our longer term improvement plans.</p> <p>4. FAQs and Troubleshooting Guides: Anticipate common questions and concerns by providing comprehensive FAQs and troubleshooting guides. Addressing potential queries pro-actively can alleviate confusion and empower customers to resolve issues independently.</p> <p>5. Personalised Support: Tailor support information to specific customer segments and demographics, taking into account factors such as language preferences, fluency, and accessibility requirements.</p> <p>6. Feedback Mechanisms: Establish feedback mechanisms to gather input from customers about the clarity and effectiveness of support information. Use this feedback to continuously refine and improve communication strategies.</p>	<p>1. Simplified Information: Conduct customer surveys and focus groups to gather feedback on the clarity of the information provided. Adjust communication based on the feedback received.</p> <p>2. Visual Aids: Review customer comprehension through follow-up surveys and analyse any changes in customer queries related to bill/communication comprehension. We will continue to utilise 'recite me' on our customer facing website which provides a broad range of accessibility solutions for our customers.</p> <p>3. Step-by-Step Guidance: Track the number of successful support accesses and customer satisfaction ratings (CSAT). Use this data to identify any areas where the guidance may need to be clarified or expanded.</p> <p>4. FAQs and Troubleshooting Guides: Measure the reduction in customer contacts related to common issues and evaluate the effectiveness of FAQs through customer feedback.</p> <p>5. Personalised Support: Collect data on the usage and effectiveness of personalised support materials. Conduct demographic-specific surveys to ensure the information meets the needs of various customer groups. Use specialist research organisations and skills to provide feedback</p> <p>6. Feedback Mechanisms: Regularly review feedback from surveys, focus groups, and customer service interactions. Implement a continuous improvement process to update communication strategies based on this feedback.</p>	<p>1. Simplified Information:</p> <ul style="list-style-type: none"> <li>Ensuring survey participation and focus group engagement from a diverse cross-section of customers to gather comprehensive feedback.</li> <li>Effectively interpreting feedback to make meaningful adjustments to communication, which may require iterative testing and refinement.</li> </ul> <p>2. Visual Aids:</p> <ul style="list-style-type: none"> <li>Creating visual aids that are universally comprehensible, catering to a wide range of literacy levels and cultural backgrounds.</li> <li>Ensuring follow-up surveys reach and are completed by a representative sample of customers to accurately assess comprehension improvements.</li> </ul> <p>3. Step-by-Step Guidance:</p> <ul style="list-style-type: none"> <li>Accurately tracking the number of successful support accesses and ensuring that customer satisfaction ratings reflect the true impact of the guidance provided.</li> <li>Identifying specific areas where the guidance needs improvement without overwhelming customers with too much information.</li> </ul> <p>4. FAQs and Troubleshooting Guides:</p> <ul style="list-style-type: none"> <li>Continuously updating FAQs and troubleshooting guides to reflect the latest customer issues and company policies, which can be resource intensive.</li> <li>Ensuring customers use these resources effectively and consistently measure their impact on reducing customer service calls.</li> </ul> <p>5. Personalised Support:</p> <ul style="list-style-type: none"> <li>Collecting and analysing demographic-specific data while respecting customer privacy and data protection regulations.</li> <li>Customising support materials to meet the diverse needs of various customer segments without introducing complexity that may confuse some customers.</li> </ul> <p>6. Feedback Mechanisms:</p> <ul style="list-style-type: none"> <li>Encouraging customers to provide honest and constructive feedback through surveys, focus groups, and interactions with customer service.</li> <li>implementing a continuous improvement process that can quickly adapt to feedback and show tangible improvements without long delays.</li> </ul>	<p>(1) Customer Satisfaction of customers on PSR and Affordability Support - to be now lower than typical customers.</p> <p>(2) Satisfaction of vulnerability stakeholders:  2024-25 - 71%  2025-26 - 71%  2026-27 - 73%  2027-28 - 75%  2028-29 - 75%  2029-30 - 75%</p> <p>(3) Number of customers utilising different channels for transactions.</p>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
1.3	Companies should seek to continuously improve the service they provide to customers who need extra help. This may include finding innovative ways to design or implement services.	Compliant	<p>At Portsmouth Water, we are dedicated to continuously enhancing the services we provide to customers who require extra help. We understand the importance of innovation in designing and implementing services to meet the evolving needs of our customers. Our ongoing efforts focus on finding innovative solutions to better serve vulnerable customers, ensuring their needs are met with efficiency and compassion. By embracing innovation, we strive to deliver the highest standards of service and support to all members of our community.</p> <p>We will use our Water Labs Collaboration with Kraken Technologies to drive innovation in customer vulnerability and affordability.</p>	<ul style="list-style-type: none"> <li>• Performance Metrics: We utilise performance metrics such as customer satisfaction surveys, response times, and service quality indicators to monitor the effectiveness of our support initiatives.</li> <li>• Feedback Mechanisms: Regular feedback from customers, advocacy groups, and frontline staff informs our continuous improvement efforts. This feedback loop ensures that our services remain responsive and adaptive to evolving customer needs.</li> </ul>	<ol style="list-style-type: none"> <li>1. Technological Integration: Incorporating new technologies to improve service delivery may require significant upfront investment in systems, software, and infrastructure. Ensuring these technologies integrate seamlessly with existing systems and processes without disruption is crucial. We have identified these challenges and ensured that our new customer applications minimise the blockers relating to this and provides the best opportunity for providing the very best service to customers.</li> <li>2. Complex Customer Needs: Vulnerable customers have diverse and sometimes complex needs that may require personalized solutions. Balancing standardized service offerings with the flexibility needed to address individual circumstances can be challenging. As we enter the compulsory installation of meters along with Smart functionality we recognise that we need to use customer needs to help support customers in water efficiency, particularly in the areas of disabilities (that may require the use of more water) and affordability (where customers may struggle to participate through latest technology and home devices)</li> <li>3. Staff Training and Engagement: Ensuring that all staff are adequately trained to understand and respond to the needs of vulnerable customers requires ongoing investment in training programs. Maintaining high levels of staff engagement and empathy over the long term is essential for delivering consistent support.</li> <li>4. Monitoring and Evaluation: Establishing effective mechanisms to monitor the impact and effectiveness of new initiatives requires clear performance metrics and regular evaluation. Ensuring that feedback loops are robust enough to identify issues and opportunities for improvement is essential.</li> </ol>	(1) Water Labs vulnerability support experiments of 2 per year.

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
1.4	<b>Companies should use a range of data to monitor the effectiveness of their extra help services, and the satisfaction levels of customers who have made such needs known.</b>	Compliant	At Portsmouth Water, we recognise that leveraging data is essential for continuously improving our services and meeting the needs of all customers, especially those requiring extra help. While we currently rely on various feedback mechanisms to monitor customer satisfaction and service effectiveness, we are committed to enhancing our data capabilities in the near future. We are investing in advanced systems and technologies to better collect, analyse, and utilise data to drive decision-making and service improvements. By harnessing the power of data analytics, predictive modeling, and customer relationship management tools, we aim to exceed expectations in understanding and addressing the needs of our customers. This investment underscores our dedication to innovation and our unwavering commitment to delivering exceptional service to all members of our community.	<ul style="list-style-type: none"> <li>• Performance Metrics: We will be establishing key performance indicators (KPIs) to measure customer satisfaction, response times, service quality, and operational efficiency. These metrics will serve as benchmarks to evaluate our progress and identify areas for improvement.</li> <li>• Regular Reviews and Audits: We will conduct regular reviews and audits of our data analytics processes and outcomes. This continuous evaluation will allow us to assess the impact of our initiatives, refine our strategies, and ensure alignment with customer expectations and regulatory standards.</li> <li>• Feedback Loop: Maintaining a dynamic feedback loop with customers, frontline staff, and stakeholders is crucial. This ongoing dialogue will provide valuable insights into the effectiveness of our data-driven improvements, enabling us to adapt quickly to changing customer needs and preferences.</li> <li>• Compliance and Governance: Adhering to stringent data protection regulations and governance frameworks is a priority. We will ensure ethical data usage practices and safeguard customer information to maintain trust and compliance.</li> </ul>	<ol style="list-style-type: none"> <li>1. Data Quality and Integration: Ensuring the accuracy, completeness, and consistency of data from various sources can be challenging. Integrating data from different systems and departments to derive meaningful insights requires robust data management practices. In the short term we are implementing a data warehouse solution that provides significantly increased access to data, data standardisation and reporting capabilities.</li> <li>2. Technology Infrastructure: Ensuring the technologies work seamlessly together and are scalable can be complex.</li> <li>3. Skills and Expertise: Building and maintaining a team with the necessary skills in data analytics, predictive modeling, and CRM systems can be challenging. Continuous training and development are essential to keep pace with technological advancements and industry best practices.</li> <li>4. Data Privacy and Security: Handling sensitive customer data in compliance with GDPR requires stringent measures for data security and privacy.</li> <li>5. Monitoring Effectiveness: Establishing meaningful performance metrics and KPIs that accurately reflect customer satisfaction and service quality can be challenging. Ensuring these metrics are relevant, measurable, and aligned with organisational goals requires careful planning and stakeholder consultation.</li> <li>6. Scalability and Sustainability: Ensuring that data-driven initiatives can scale effectively and that they remain sustainable in the long term requires careful planning and resource allocation.</li> </ol>	<ol style="list-style-type: none"> <li>(1) Customer Satisfaction of customers on PSR and Affordability Support - to be now lower than typical customers.</li> <li>(2) In the longer term we will implement audits to ensure that our services meet the quality standard ISO 22458 relevant to water companies.</li> <li>(3) When we implement our new customer facing website we will ensure that it meets the relevant WCAG "AA" standard in place at that time and continues to adhere based on technology improvements</li> </ol>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
2.1	<p><b>Companies should interact with customers in a way that is inclusive for a diverse range of audiences. This should be underpinned by relevant insights, which may include research, engagement and accreditation.</b></p>	Compliant	<p>At Portsmouth Water, we prioritise inclusive interactions with our customers, catering to a diverse range of audiences. Our approach is underpinned by relevant insights gathered through research, engagement initiatives, and through our daily interactions with customers. We actively seek to understand the unique needs and preferences of different customer segments, ensuring that our communication channels, services, and support mechanisms are accessible and inclusive to all. By incorporating insights from research, engaging with our community, and maintaining relevant accreditations, we aim to foster meaningful connections and deliver services that meet the diverse needs of our customers.</p>	<ul style="list-style-type: none"> <li>• <b>Feedback Collection:</b> We regularly collect feedback from customers through surveys, complaint logs, and feedback forms. This ongoing feedback loop helps us assess customer satisfaction levels and identify areas where we can enhance our inclusive interactions. We have implemented additional data support with data science capabilities to support analysis, insight and improvements.</li> <li>• <b>Performance Metrics:</b> We have established key performance indicators (KPIs) to measure the accessibility of our services, customer satisfaction rates, and responsiveness to diverse customer needs. These metrics serve as benchmarks to track our progress over time.</li> <li>• <b>Community Engagement Evaluation:</b> We monitor the participation and feedback received from community engagement initiatives, such as focus groups and customer forums. This allows us to gauge the impact of these initiatives on understanding and meeting the unique needs of different customer segments.</li> <li>• <b>Accreditations and Standards:</b> Maintaining and monitoring relevant accreditations and certifications related to customer service and inclusivity standards. Compliance with these standards ensures that our practices align with best practices and regulatory expectations.</li> <li>• <b>Ongoing improvement:</b> We have made customer segmentation a key part of our experiment delivery through our Water Labs innovation collaboration.</li> </ul>	<ol style="list-style-type: none"> <li>1. <b>Data Collection and Integration:</b> Ensuring comprehensive and accurate data collection from diverse customer segments can be challenging. Integrating data from various sources and systems to gain holistic insights into customer preferences and needs requires robust data management practices.</li> <li>2. <b>Feedback Accuracy and Reliability:</b> Collecting reliable and actionable feedback from customers, especially vulnerable groups, may be challenging due to varying communication preferences, accessibility barriers, and reluctance to provide feedback.</li> <li>3. <b>Performance Metric Definition:</b> Defining meaningful performance metrics and KPIs that accurately measure the effectiveness of inclusive interactions can be complex. Ensuring these metrics align with strategic objectives and reflect diverse customer needs is essential for meaningful evaluation.</li> <li>4. <b>Community Engagement Effectiveness:</b> Engaging effectively with diverse communities and stakeholders to gather insights and feedback requires dedicated resources and tailored communication strategies. Overcoming language barriers, cultural sensitivities, and accessibility issues are key considerations.</li> <li>5. <b>Training and Engagement:</b> Ensuring that frontline staff and stakeholders have the necessary skills, knowledge, and empathy to interact inclusively with customers across diverse backgrounds and needs requires ongoing training and capacity-building efforts.</li> <li>6. <b>Data Privacy and Security:</b> Handling sensitive customer data in compliance with GDPR requires stringent measures for data security and privacy.</li> </ol>	<p>(1) In the longer term implement improved segmentation insight into relevant reporting and governance.</p>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
2.2	<b>Companies should offer their customers a range of ways to interact and communicate. This includes allowing customers to opt for third party billing where appropriate.</b>	Compliant	<p>We understand the importance of offering our customers a variety of ways to interact and communicate with us. That's why we provide a wide range of communication channels, including phone, email, mail, live chat, and in-person support, to accommodate different preferences and accessibility needs. We are committed to ensuring digital inclusion by not excluding individuals who may prefer non-digital communication methods. Additionally, we recognise the importance of flexibility in billing preferences, and we offer options such as third-party billing where appropriate, to meet the diverse needs of our customers.</p> <p>Our goal is to ensure that every customer has access to the communication channels and billing options that best suit their individual circumstances, promoting inclusivity and customer satisfaction. As part of this approach we have committed in the longer term (2026+) to implement a vulnerability hub in our customer applications.</p> <p>We will continue to offer our 3rd party nominee scheme as well as through our new customer applications make it even easier for our customers to register for vulnerability services.</p> <p>To improve our communications which are critical (such as during incidents) we will look as to how we can use multiple communication channels to supply relevant and up to date information to vulnerable customers or their nominated 3rd party.</p>	<ul style="list-style-type: none"> <li>• Usage and Preference Analysis: Track and analyse usage patterns of communication channels to understand customer preferences. This includes monitoring the frequency and volume of interactions through each channel to identify trends and popular choices.</li> <li>• Customer Feedback Mechanisms: Regular collection of feedback through surveys, feedback forms, and customer service interactions to gauge satisfaction with communication methods and billing options. This feedback is crucial in identifying areas for improvement and understanding customer needs.</li> <li>• Accessibility and Inclusivity Assessments: Conducting periodic assessments and audits to ensure that all communication channels are accessible and inclusive. This includes evaluating the accessibility of third-party billing options to ensure they meet regulatory standards and customer expectations.</li> <li>• Performance Metrics and KPIs: Establishing key performance indicators (KPIs) related to customer satisfaction with communication options and third-party billing. These metrics serve as benchmarks to measure our performance and track improvements over time.</li> <li>• Compliance Monitoring: Ensuring compliance with regulatory requirements related to communication accessibility and billing practices. Regular reviews and audits help us maintain alignment with Ofwat guidelines and other regulatory standards.</li> <li>• Continuous Improvement Initiatives: Implementing a continuous improvement cycle based on monitoring outcomes and feedback. This involves adapting our communication strategies and billing options based on customer insights and emerging trends in customer behaviour.</li> </ul>	<ol style="list-style-type: none"> <li>1. Customer Preference Variability: Customers have diverse preferences for communication channels and billing methods. Meeting the varied needs of a diverse customer base requires ongoing adaptation and flexibility in service offerings.</li> <li>2. Accessibility and Inclusivity: Ensuring that all communication channels and billing options are accessible to customers with disabilities or those who prefer non-digital methods can be challenging. Meeting accessibility standards and providing equitable service to all customers requires continuous monitoring and improvement.</li> <li>3. Data Security and Privacy: Handling sensitive customer data, especially in the context of billing information and third-party billing arrangements, requires stringent data security measures. Compliance with data protection regulations (e.g. GDPR) is crucial to maintain customer trust and regulatory compliance.</li> <li>4. Customer Education and Awareness: Educating customers about the available communication channels and billing options, including the benefits and processes involved in third-party billing, is essential. Ensuring customers are informed and empowered to make choices that best suit their needs can require targeted communication and outreach efforts.</li> <li>5. Operational Efficiency: Balancing the efficiency of communication channels and billing processes with the need to provide personalised and responsive customer service can be challenging. Streamlining operations while maintaining high service standards is crucial to meeting customer expectations.</li> <li>6. Monitoring Effectiveness: Establishing meaningful performance metrics and KPIs to measure the effectiveness of communication channels and customer satisfaction with billing options requires careful planning and alignment with organizational goals. Ensuring these metrics accurately reflect customer preferences and service quality is essential for informed decision-making.</li> </ol>	<ol style="list-style-type: none"> <li>(1) The number of channels offered to customers for communications.</li> <li>(2) Analysis of Customer Satisfaction of vulnerable customers relating to customer communication by channel.</li> <li>(3) Number of customers using our nominee services.</li> </ol>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
2.3	<b>Companies should consult with CCW, and engage with stakeholders and other customer representatives, when making significant changes to their proposed service offering around vulnerability.</b>	Compliant	<p>At Portsmouth Water, we recognise the importance of consulting with CCW and engaging with stakeholders and customer representatives, including our Customer Scrutiny Panel (Independent Challenge Group), local councils, Citizens Advice, and other central organisations, when considering significant changes to our service offerings, particularly those related to vulnerability. We understand that these changes can have a significant impact on our customers, especially those who are vulnerable, and it is crucial to gather insights and feedback from relevant stakeholders to ensure that our decisions are informed and inclusive. By consulting with CCW and engaging with our stakeholders and customer representatives, we can better understand the needs and concerns of our customers and work collaboratively to develop solutions that meet their needs effectively.</p> <p>Based on our immediate Business Plan we consider we will be engaging with CCW across a number of areas including:</p> <ul style="list-style-type: none"> <li>- Our Compulsory Smart Metering Programme</li> <li>- customer approach, policies and tariff approaches coupled with insight.</li> <li>- Significant changes to our debt management process including tailored customer journeys</li> </ul>	<p>1. Consultation Effectiveness:</p> <ul style="list-style-type: none"> <li>• Feedback Collection: We will regularly collect feedback from CCW on the effectiveness of our collaborations and consultation. We shall also gain feedback from stakeholders through structured consultations and meetings. This includes gathering insights on proposed changes and their potential impacts on vulnerable customers.</li> <li>• Surveys and Interviews: Conducting surveys and interviews to gauge satisfaction levels and gather specific feedback on consultation processes and outcomes.</li> </ul> <p>2. Stakeholder Engagement:</p> <ul style="list-style-type: none"> <li>• Engagement Metrics: Tracking participation rates and engagement levels of stakeholders, including the Customer Challenge Group (Customer Scrutiny Panel for PWL), local councils, and Citizens Advice. This helps assess the breadth and depth of stakeholder involvement.</li> <li>• Feedback Analysis: Analysing stakeholder feedback to identify common themes, concerns, and suggestions related to vulnerability strategies and service changes.</li> </ul> <p>3. Compliance and Alignment:</p> <ul style="list-style-type: none"> <li>• Regulatory Compliance: Ensuring that all consultations and service changes comply with regulatory requirements and align with Ofwat guidelines. Regular audits and reviews help maintain alignment with CCW and stakeholders.</li> </ul>	<p>1. Diverse Stakeholder Perspectives: Balancing and reconciling diverse stakeholder perspectives and interests can be complex. Different stakeholders may have varying priorities, agendas, and expectations regarding vulnerability strategies and service changes, requiring careful navigation and negotiation.</p> <p>2. Timeliness of Feedback: Obtaining timely feedback from stakeholders, particularly when making significant decisions or changes, can be challenging. Delays in feedback can impact decision-making timelines and the ability to address emerging issues promptly.</p> <p>3. Accessibility and Inclusivity: Ensuring that consultation processes are accessible and inclusive to all stakeholders, including those with disabilities or language barriers, requires proactive measures. Providing alternative communication methods and formats may be necessary to accommodate diverse needs effectively.</p> <p>4. Data Management and Analysis: Managing and analysing large volumes of feedback and data collected from consultations and stakeholder engagements can be resource-intensive. Ensuring data accuracy, confidentiality, and relevance is crucial for informed decision-making and strategy development.</p> <p>5. Resistance to Change: Stakeholders or customer representatives may resist proposed changes or initiatives, especially if they perceive potential impacts on the customer. Addressing resistance through effective communication and transparency is essential for gaining buy-in and support.</p> <p>6. Measuring Impact and Effectiveness: Establishing meaningful metrics and KPIs to measure the impact of stakeholder engagement on decision-making and service outcomes may be challenging. Ensuring that monitoring efforts accurately reflect stakeholder input and contribute to continuous improvement is critical.</p>	(1) In the longer term implement improved segmentation insight into relevant reporting and governance.

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
2.2	<b>Companies should offer their customers a range of ways to interact and communicate. This includes allowing customers to opt for third party billing where appropriate.</b>	Compliant	<p>We understand the importance of offering our customers a variety of ways to interact and communicate with us. That's why we provide a wide range of communication channels, including phone, email, mail, live chat, and in-person support, to accommodate different preferences and accessibility needs. We are committed to ensuring digital inclusion by not excluding individuals who may prefer non-digital communication methods. Additionally, we recognise the importance of flexibility in billing preferences, and we offer options such as third-party billing where appropriate, to meet the diverse needs of our customers.</p> <p>Our goal is to ensure that every customer has access to the communication channels and billing options that best suit their individual circumstances, promoting inclusivity and customer satisfaction. As part of this approach we have committed in the longer term (2026+) to implement a vulnerability hub in our customer applications.</p> <p>We will continue to offer our 3rd party nominee scheme as well as through our new customer applications make it even easier for our customers to register for vulnerability services.</p> <p>To improve our communications which are critical (such as during incidents) we will look as to how we can use multiple communication channels to supply relevant and up to date information to vulnerable customers or their nominated 3rd party.</p>	<ul style="list-style-type: none"> <li>• Usage and Preference Analysis: Track and analyse usage patterns of communication channels to understand customer preferences. This includes monitoring the frequency and volume of interactions through each channel to identify trends and popular choices.</li> <li>• Customer Feedback Mechanisms: Regular collection of feedback through surveys, feedback forms, and customer service interactions to gauge satisfaction with communication methods and billing options. This feedback is crucial in identifying areas for improvement and understanding customer needs.</li> <li>• Accessibility and Inclusivity Assessments: Conducting periodic assessments and audits to ensure that all communication channels are accessible and inclusive. This includes evaluating the accessibility of third-party billing options to ensure they meet regulatory standards and customer expectations.</li> <li>• Performance Metrics and KPIs: Establishing key performance indicators (KPIs) related to customer satisfaction with communication options and third-party billing. These metrics serve as benchmarks to measure our performance and track improvements over time.</li> <li>• Compliance Monitoring: Ensuring compliance with regulatory requirements related to communication accessibility and billing practices. Regular reviews and audits help us maintain alignment with Ofwat guidelines and other regulatory standards.</li> <li>• Continuous Improvement Initiatives: Implementing a continuous improvement cycle based on monitoring outcomes and feedback. This involves adapting our communication strategies and billing options based on customer insights and emerging trends in customer behaviour.</li> </ul>	<ol style="list-style-type: none"> <li>1. Customer Preference Variability: Customers have diverse preferences for communication channels and billing methods. Meeting the varied needs of a diverse customer base requires ongoing adaptation and flexibility in service offerings.</li> <li>2. Accessibility and Inclusivity: Ensuring that all communication channels and billing options are accessible to customers with disabilities or those who prefer non-digital methods can be challenging. Meeting accessibility standards and providing equitable service to all customers requires continuous monitoring and improvement.</li> <li>3. Data Security and Privacy: Handling sensitive customer data, especially in the context of billing information and third-party billing arrangements, requires stringent data security measures. Compliance with data protection regulations (e.g. GDPR) is crucial to maintain customer trust and regulatory compliance.</li> <li>4. Customer Education and Awareness: Educating customers about the available communication channels and billing options, including the benefits and processes involved in third-party billing, is essential. Ensuring customers are informed and empowered to make choices that best suit their needs can require targeted communication and outreach efforts.</li> <li>5. Operational Efficiency: Balancing the efficiency of communication channels and billing processes with the need to provide personalised and responsive customer service can be challenging. Streamlining operations while maintaining high service standards is crucial to meeting customer expectations.</li> <li>6. Monitoring Effectiveness: Establishing meaningful performance metrics and KPIs to measure the effectiveness of communication channels and customer satisfaction with billing options requires careful planning and alignment with organizational goals. Ensuring these metrics accurately reflect customer preferences and service quality is essential for informed decision-making.</li> </ol>	(1) The identified areas of engagement are all undertaken with CCW in a reasonable timeframe.



No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
3.1	<b>Companies should take active steps to identify customers who require extra help who have not yet been identified.</b>	Compliant	We are committed to proactively identifying customers who may require extra help but have not yet been identified. We understand the importance of reaching out to vulnerable individuals who may not have self-identified or may be unaware of the support available to them. To achieve this, we employ various proactive measures, such as analysing customer data to identify potential indicators of vulnerability, collaborating with community organisations and local authorities to identify hard to reach customers, and conducting targeted outreach campaigns to raise awareness of our support services. By taking active steps to identify customers in need of extra help, we can ensure that no one falls through the cracks and that all members of our community receive the assistance they require.	<p>1. Performance Metrics and KPIs:</p> <ul style="list-style-type: none"> <li>Newly Identified Customers: Establishing KPIs to track the number of newly identified vulnerable customers through our proactive measures, such as data analysis and outreach campaigns.</li> <li>Conversion Rates: Monitoring conversion rates from outreach efforts to determine the effectiveness of our communication and engagement strategies in reaching vulnerable individuals.</li> <li>Customer Engagement: Tracking customer engagement levels with our support services post-identification to assess satisfaction and utilisation rates.</li> <li>Number of data shares in place and % of region covered by data shares.</li> </ul> <p>2. Feedback Mechanisms:</p> <ul style="list-style-type: none"> <li>Customer Surveys: Conducting surveys and feedback sessions with identified customers to gather insights on their experience with our support programs. This includes feedback on accessibility, effectiveness, and areas for improvement.</li> <li>Stakeholder Input: Seeking feedback from community organisations, local authorities, and social service agencies involved in our outreach efforts. Their input helps evaluate the reach and impact of our proactive identification initiatives.</li> </ul> <p>3. Data Analysis and Reporting:</p> <ul style="list-style-type: none"> <li>Regular Data Reviews: Performing regular reviews of customer data analytics to evaluate the accuracy and reliability of vulnerability indicators used for identification.</li> <li>Reporting and Analysis: Analysing trends and patterns in customer data to identify areas for enhancement in our proactive identification strategies. This includes identifying demographic shifts or emerging needs within our customer base.</li> </ul> <p>4. Continuous Improvement:</p> <ul style="list-style-type: none"> <li>Actionable Insights: Using insights gathered from monitoring activities to inform continuous improvement initiatives. This involves adapting strategies based on feedback and data analysis to enhance the effectiveness of our proactive identification efforts.</li> <li>Training and Development: Providing ongoing training for staff involved in customer outreach and support services based on identified areas for improvement and emerging customer needs.</li> <li>Emerging technologies: We will continuously monitor emerging technologies aimed at proactively increasing customer awareness through regular assessment of their effectiveness, integration feasibility, and alignment with our strategic goals</li> </ul> <p>5. Compliance and Alignment:</p> <ul style="list-style-type: none"> <li>Regulatory Compliance: Ensuring that monitoring activities align with regulatory requirements and Ofwat guidelines related to customer vulnerability and support services.</li> <li>Audit and Review: Conducting periodic audits and reviews of monitoring processes to ensure adherence to established standards.</li> </ul>	<p>1. Data Collection and Accuracy:</p> <ul style="list-style-type: none"> <li>Ensuring the accuracy and reliability of customer data used to identify potential indicators of vulnerability.</li> <li>Balancing the need for detailed customer data with privacy concerns and regulatory requirements for data protection.</li> </ul> <p>2. Engagement with Hard-to-Reach Customers:</p> <ul style="list-style-type: none"> <li>Effectively reaching vulnerable individuals who may not engage with traditional communication channels or who are wary of outreach efforts.</li> <li>Addressing barriers such as language differences, digital literacy, and cultural differences that may prevent vulnerable customers from accessing support services.</li> </ul> <p>3. Collaboration with Community Organisations:</p> <ul style="list-style-type: none"> <li>Coordinating efforts with multiple community organisations, local authorities, and social services to ensure a unified approach.</li> <li>Maintaining consistent communication and support messaging across different partners.</li> </ul> <p>4. Customer Feedback:</p> <ul style="list-style-type: none"> <li>Encouraging participation in surveys and feedback sessions from vulnerable customers who may be reluctant to share their experiences.</li> <li>Analysing qualitative feedback to derive actionable insights can be complex and time-consuming.</li> </ul> <p>5. Data Analysis and Reporting:</p> <ul style="list-style-type: none"> <li>Identifying trends and patterns in customer data that accurately reflect emerging needs and vulnerabilities within the customer base.</li> <li>Ensuring that data analysis methods and tools are continuously updated to reflect the latest best practices and technological advancements.</li> </ul> <p>6. Continuous Improvement:</p> <ul style="list-style-type: none"> <li>Translating insights from monitoring activities into actionable improvements that can be implemented effectively.</li> <li>Providing ongoing training and development for staff based on evolving customer needs and feedback.</li> </ul> <p>7. Emerging Technologies:</p> <ul style="list-style-type: none"> <li>Evaluating and integrating new technologies aimed at increasing customer awareness can be resource-intensive and may require significant changes to existing systems and processes.</li> <li>Continuously assessing the effectiveness and feasibility of emerging technologies in achieving strategic goals.</li> </ul>	<p>(1) Number of data shares in place to support customers for vulnerability and affordability</p> <p>(2) % of region covered by data shares split by Vulnerability and Affordability</p> <p>(3) Data revalidation KPI Measure:</p> <ul style="list-style-type: none"> <li>- Attempted contacts (90%)</li> <li>- Actual contacts (35%)</li> </ul>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
3.2	<b>Companies should take steps to proactively increase customer awareness of the extra help available to those who need it.</b>	Compliant	<p>1. Communication Campaigns: Targeted communication campaigns across various channels, including website banners, social media posts, newsletters, and bill inserts, to raise awareness of available support services.</p> <p>2. Customer Outreach: Proactively reach out to customers through personalised communications, such as letters, email and direct mail campaigns, to inform them about the extra help options available and how to access them.</p> <p>3. Collaboration with Community Partners: Partner with local community organisations, charities, and support groups to leverage their networks and amplify outreach efforts to reach vulnerable populations. Ongoing assessment of Stakeholder mapping from which partnerships will be drawn.</p> <p>4. Training and Support for Frontline Staff: Equip frontline staff with training and resources to identify signs of vulnerability and effectively communicate available support options to customers during interactions.</p> <p>5. Accessible Information: Ensure that information about extra help services is easily accessible and understandable, with clear instructions on how to access support provided through various communication channels.</p> <p>6. Feedback Mechanisms: Establish feedback mechanisms to gather input from customers about the effectiveness of awareness efforts and use this feedback to continuously refine communication strategies.</p>	<p>1. Communication Campaigns:</p> <ul style="list-style-type: none"> <li>Engagement Metrics: Track engagement metrics such as website visits, social media interactions, email campaign open rates, and customer inquiries resulting from communication campaigns.</li> <li>Performance Reviews: Regularly review campaign performance data and adjust strategies based on engagement insights.</li> </ul> <p>2. Customer Outreach:</p> <ul style="list-style-type: none"> <li>Response Rates: Monitor response rates and customer feedback from personalised outreach efforts.</li> <li>CRM Tracking: Use data &amp; insights to track the effectiveness of personalised communications and adjust messaging based on customer responses.</li> </ul> <p>3. Collaboration with Community Partners:</p> <ul style="list-style-type: none"> <li>Impact Evaluation: Evaluate the impact of partnerships by tracking referrals, engagement levels, and the number of customers reached through community partners.</li> <li>Partner Feedback: Regularly meet with partners to gather feedback and identify areas for improvement.</li> </ul> <p>4. Training and Support for Frontline Staff:</p> <ul style="list-style-type: none"> <li>Training Effectiveness: Assess training effectiveness through staff feedback, customer satisfaction surveys, and the frequency of support service referrals made by frontline staff.</li> <li>Program Adjustments: Adjust training programs based on evaluations and identified needs.</li> </ul> <p>5. Accessible Information:</p> <ul style="list-style-type: none"> <li>Review and Testing: Regularly review the accessibility and clarity of information provided on different platforms.</li> <li>Customer Feedback: Conduct user testing and gather feedback from customers to ensure information is easily navigable and comprehensible.</li> </ul> <p>6. Feedback Mechanisms:</p> <ul style="list-style-type: none"> <li>Data Collection: Collect and analyse customer feedback through surveys, focus groups, and direct feedback channels.</li> <li>Trend Analysis: Use this data to identify trends and measure the impact of awareness initiatives.</li> <li>Continuous Improvement: Implement improvements based on feedback to continuously refine communication strategies.</li> </ul>	<p>1. Engagement and Reach:</p> <ul style="list-style-type: none"> <li>Targeting Diverse Audiences: Reaching a diverse customer base with varied needs and preferences, particularly ensuring inclusion of vulnerable customers who may not be digitally literate or have limited access to online resources.</li> </ul> <p>2. Collaboration with Community Partners:</p> <ul style="list-style-type: none"> <li>Coordination and Alignment: Coordinating efforts with multiple community organisations, charities, and support groups, requiring alignment of goals, schedules, and processes.</li> <li>Consistency of Message: Ensuring all partners communicate consistent and accurate information about the support services available.</li> </ul> <p>3. Training and Support for Frontline Staff:</p> <ul style="list-style-type: none"> <li>Training Quality: Providing comprehensive and ongoing training for frontline staff to effectively identify and support vulnerable customers.</li> <li>Staff Turnover: Managing high turnover rates among frontline staff, which can lead to gaps in knowledge and inconsistencies in the delivery of support services.</li> </ul> <p>4. Creating Accessible Information:</p> <ul style="list-style-type: none"> <li>Clarity and Accessibility: Ensuring information about support services is clear, accessible, and understandable to all customers, including those with disabilities or language barriers.</li> <li>Updating Information: Keeping information up to date across all platforms and ensuring consistency.</li> </ul> <p>5. Data Collection and Analysis:</p> <ul style="list-style-type: none"> <li>Accurate Tracking: Ensuring accurate tracking of engagement metrics, response rates, and customer feedback across various channels.</li> <li>Data Integration: Integrating data from different sources (e.g., CRM systems, partner feedback, customer surveys) into a cohesive monitoring framework.</li> </ul> <p>6. Customer Feedback:</p> <ul style="list-style-type: none"> <li>Feedback Participation: Encouraging customers, especially vulnerable ones, to provide feedback, leading to potential gaps in understanding customer needs and the effectiveness of initiatives.</li> <li>Analysing Feedback: Analysing qualitative feedback from various sources to derive actionable insights.</li> </ul>	<p>(1) Stakeholder mapping:</p> <ul style="list-style-type: none"> <li>increasing number of stakeholders annually (to 2030)</li> <li>maturity assessment score improvement annually (to 2030)</li> </ul> <p>(2) Training assessment of customer facing teams - % trained</p>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
3.3	<b>Companies should train their staff to spot potential requirements for extra help, even when a customer has not previously declared it.</b>	Compliant	<p>1. Education on Signs of Vulnerability: We provide comprehensive training to frontline staff on recognising signs of potential vulnerability, such as irregular payment patterns, frequent account inquiries, or mentions of financial difficulties during customer interactions. Our most recent training was delivered through East Hants Citizens Advise in April 2024, to help our frontline staff in identifying customer that may need extra help.</p> <p>2. Empathy and Sensitivity Training: Train staff to approach customer interactions with empathy and sensitivity, creating a welcoming environment that encourages customers to share their needs and concerns openly.</p> <p>3. Effective Communication Skills: Equip staff with effective communication skills to tactfully inquire about customers' well-being and offer support without making assumptions or causing discomfort.</p> <p>4. Knowledge of Support Services: Ensure that staff are knowledgeable about the range of extra help services available, including payment assistance programs, community resources, and crisis support services so they can provide relevant information and assistance to customers in need.</p> <p>5. Escalation Process: Establish clear processes for staff to follow when they identify potential requirements for extra help, including procedures for escalating concerns to appropriate internal departments or referring customers to external support agencies.</p> <p>6. Ongoing Refresher Training: Conduct regular refresher training sessions to reinforce staff knowledge and skills in identifying and responding to customers' potential requirements for extra help, keeping them up-to-date with any changes in policies or available support services. This is delivered both in-house and through external parties such as Citizens Advice.</p> <p>7. Feedback and Improvement: Encourage staff to provide feedback on the effectiveness of training programs and share insights from customer interactions to continuously improve staff readiness in identifying and addressing potential requirements for extra help.</p> <p>8. Through our Water Labs collaboration we have a longer term ambition to understand how sentiment analysis through using technology to support our teams in customer channels</p>	<p>1. Training Effectiveness:</p> <ul style="list-style-type: none"> <li>• Assessment Scores: Track assessment scores before and after training sessions to measure knowledge retention and comprehension.</li> <li>• Completion Rates: Monitor the completion rates of training and refresher sessions to ensure all staff are adequately trained.</li> </ul> <p>2. Customer Interaction Metrics:</p> <ul style="list-style-type: none"> <li>• Identification Rates: Measure the number of customers identified as needing extra help through staff interactions and track any changes over time.</li> <li>• Resolution Times: Track the time taken to address identified needs and provide support to ensure timely assistance.</li> </ul> <p>3. Feedback Mechanisms:</p> <ul style="list-style-type: none"> <li>• Staff Surveys: Conduct regular surveys with frontline staff to gather feedback on the effectiveness of the training programs and identify areas for improvement.</li> <li>• Customer Feedback: Collect feedback from customers who have been identified as vulnerable to evaluate the impact of staff interactions on their experience.</li> </ul> <p>4. Escalation Process Efficiency:</p> <ul style="list-style-type: none"> <li>• Escalation Tracking: Monitor the number and type of cases escalated to internal departments or external agencies to assess the effectiveness of the escalation process.</li> <li>• Follow-Up Outcomes: Track the outcomes of escalated cases to ensure that customers receive the necessary support.</li> </ul> <p>5. Continuous Improvement:</p> <ul style="list-style-type: none"> <li>• Review Meetings: Hold regular review meetings to discuss insights from staff feedback and customer interactions, making necessary adjustments to training and processes.</li> <li>• Policy Updates: Ensure that any changes in policies or available support services are promptly incorporated into training materials and communicated to staff.</li> </ul>	<p>1.Data Accuracy:</p> <ul style="list-style-type: none"> <li>• Ensuring that customer data used for identifying vulnerability indicators is accurate and reliable.</li> </ul> <p>2. Staff Engagement:</p> <ul style="list-style-type: none"> <li>• Encouraging active participation and buy-in from frontline staff in training programs and feedback mechanisms.</li> <li>• Addressing potential resistance or scepticism from staff towards new processes or additional responsibilities.</li> </ul> <p>3. Customer Privacy and Data Protection:</p> <ul style="list-style-type: none"> <li>• Balancing the need for detailed customer information with privacy concerns and GDPR requirements.</li> </ul> <p>4. Effective Communication Across Departments:</p> <ul style="list-style-type: none"> <li>• Ensuring clear communication and collaboration between frontline staff, internal departments, and external agencies involved in the escalation process.</li> <li>• Addressing potential communication gaps that could delay or hinder timely and accurate support for vulnerable customers.</li> </ul> <p>5. Measuring Training Effectiveness:</p> <ul style="list-style-type: none"> <li>• Establishing meaningful KPIs and metrics to accurately assess the impact of training on staff readiness and customer outcomes.</li> <li>• Continuously evaluating and refining training methods based on feedback and performance metrics.</li> </ul> <p>6. Adapting to Changing Needs and Regulations:</p> <ul style="list-style-type: none"> <li>• Staying agile and responsive to changes in customer needs, regulatory requirements, and industry standards.</li> <li>• Updating training materials and processes to reflect new policies or available support services promptly.</li> </ul> <p>7. Monitoring and Improving Customer Feedback Mechanisms:</p> <ul style="list-style-type: none"> <li>• Encouraging consistent participation in feedback surveys from both staff and vulnerable customers.</li> </ul> <p>8. Continuous Improvement Culture:</p> <ul style="list-style-type: none"> <li>• Fostering and maintaining a culture of continuous learning and improvement among staff regarding identifying and addressing customer vulnerability.</li> <li>• Implementing feedback from review meetings and policy updates effectively to enhance staff readiness and customer support.</li> </ul> <p>9. Maintaining Stakeholder Engagement:</p> <ul style="list-style-type: none"> <li>• Sustaining productive partnerships with community organisations, local authorities, and social services to enhance outreach efforts.</li> </ul>	<p>(1) Training assessment of customer facing teams - % trained</p> <p>(2) In the longer term we will implement audits to ensure that our services meet the quality standard ISO 22458 relevant to water companies.</p> <p>(3) PSR Targets are set as % of household properties:</p> <p>2024-25 - 12%</p> <p>2025-26 - 12.5%</p> <p>2026-27 - 13%</p> <p>2027-28 - 13.5%</p> <p>2028-29 - 14%</p> <p>2029-30 - 14.5%</p>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
3.4	<b>Companies should actively consider how they can reduce communication burdens on customers who need extra help; this could include establishing data sharing arrangements with partner organisations.</b>	Compliant	<p>1. Streamlined Communication Channels: We offer simplified and consolidated communication channels through single point of contact centres, online portal, and full omnichannel capabilities where customers can easily access information and support without having to navigate multiple channels or departments.</p> <p>2. Personalised Communication Preferences: Allow customers to specify their communication preferences, such as preferred language, channel (e.g., email, phone, mail), and frequency, to tailor communication to their individual needs and reduce unnecessary communication burdens.</p> <p>3. Data privacy and Security: Ensure that data sharing arrangements adhere to privacy and security policies, with clear consent processes and safeguards in place to protect customer information and comply with data protection regulations.</p> <p>4. Continuous Monitoring and Evaluation: Regularly monitor and evaluate the effectiveness of communication strategies and data sharing arrangements in reducing communication burdens on customers. Obtain feedback from customers and stakeholders to identify areas for improvement and make necessary adjustments accordingly.</p> <p>5. Community Engagement: Engage with local communities and partner organisations to raise awareness of available support services, promote understanding of data sharing arrangements, and address any concerns or misconceptions about privacy and security.</p> <p>6. Data share Partnerships: We will continue to maintain our existing Data share partnerships to support the ‘tell us once’ approach</p> <p>7. Our vulnerability Hub implemented within our customer applications in the longer term will also enable stakeholders to register customers for vulnerability services and support</p>	<p>1. Monitoring Streamlined Communication Channels:</p> <ul style="list-style-type: none"> <li>Track usage data and customer feedback through analytics tools to assess the effectiveness of the consolidated channels.</li> <li>Measure response times and resolution rates for inquiries and support requests via streamlined channels.</li> </ul> <p>2. Evaluation of Personalised Communication Preferences:</p> <ul style="list-style-type: none"> <li>Conduct CSAT surveys to measure effectiveness of personalised communication options.</li> <li>Monitor the uptake of different communication channels and preferences selected by customers over time.</li> </ul> <p>3. Compliance and Auditing for Data Privacy and Security:</p> <ul style="list-style-type: none"> <li>Conduct regular audits and compliance checks to ensure adherence to data privacy and security policies.</li> <li>Review internal protocols and external data sharing agreements to verify compliance with regulatory requirements.</li> </ul> <p>4. Continuous Monitoring and Evaluation of Strategies:</p> <ul style="list-style-type: none"> <li>Establish KPIs related to communication effectiveness and customer satisfaction with communication practices.</li> <li>Regularly review performance metrics to identify areas for improvement in reducing communication burdens.</li> </ul> <p>5. Feedback Mechanisms from Customers and Stakeholders:</p> <ul style="list-style-type: none"> <li>Implement feedback mechanisms such as surveys, focus groups, or complaint handling processes to gather insights from involved parties.</li> <li>Analyse feedback to identify trends, issues, and opportunities for enhancing communication strategies.</li> </ul> <p>6. Impact Assessment of Community Engagement:</p> <ul style="list-style-type: none"> <li>Measure the impact of community engagement efforts through feedback from community organisations and local stakeholders.</li> <li>Evaluate changes in awareness and perception of support services and data sharing arrangements within the community.</li> </ul> <p>7. Adaptation to Feedback and Continuous Improvement:</p> <ul style="list-style-type: none"> <li>Use insights from monitoring and feedback mechanisms to make continuous improvements to communication channels and practices.</li> <li>Update training programs, communication materials, and policies based on feedback and evaluation outcomes.</li> </ul>	<p>1. Data Privacy Regulations: Ensuring compliance with GDPR while implementing data sharing arrangements with partner organisations can be challenging. Balancing the need for effective communication with robust data privacy and security measures requires careful management and ongoing monitoring.</p> <p>2. Technical Integration and Compatibility: Integrating diverse communication channels and ensuring seamless operation across different platforms (e.g. online portal, contact centres and third parties) may encounter technical challenges. Ensuring compatibility and reliability of omnichannel capabilities can be resource-intensive and require ongoing support.</p> <p>3. Customer Acceptance and Consent: Gaining customer trust and obtaining clear consent for data sharing and personalised communication preferences may pose challenges. Customers may have concerns about privacy implications despite safeguards in place, necessitating transparent communication and education efforts.</p> <p>4. Training and Staff Readiness: Ensuring frontline staff are adequately trained to handle personalised communication preferences and effectively navigate streamlined channels requires ongoing investment in training and development. Maintaining consistency in empathy, sensitivity, and communication skills across all staff members can be demanding.</p> <p>5. Monitoring Effectiveness and Feedback: Effectively monitoring the impact of communication strategies and data sharing arrangements requires robust analytics and feedback mechanisms. Analysing and translating feedback into actionable improvements while maintaining alignment with regulatory standards can be complex.</p> <p>6. Community Engagement and Stakeholder Collaboration: Engaging local communities and partner organisations to promote understanding of support services and data sharing arrangements demands proactive outreach and collaboration. Addressing varied stakeholder perspectives and maintaining alignment with community expectations requires ongoing effort and responsiveness.</p> <p>7. Continuous Improvement and Adaptation: Adapting communication strategies, policies, and training programs to evolving customer needs and regulatory changes requires a proactive approach to change management.</p>	<p>(1) Number of data shares in place to support customers for vulnerability and affordability</p> <p>(2) Vulnerability Hub implemented and available for 3rd party trusted stakeholder use.</p>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
4.1	<b>Companies should take appropriate steps to record customers' extra help needs. These records should be held securely and in line with wider data protection requirements.</b>	Compliant	<p>1. Establish Clear Procedures: Delivery of processes and policies for recording customers' extra help needs, including what information should be collected, how it should be recorded, and who has access to this information. Our customer application will in the short term include providing our teams with vulnerable customer awareness without sharing specific data beyond that needed.</p> <p>2. Training for Staff: Provide comprehensive training to staff on the importance of recording customers' extra help needs accurately and securely, including guidance on data protection regulations and confidentiality requirements. This training will be assessed through quality checks and where agents are not meeting or exceeding expectations then they will undergo retraining and coaching.</p> <p>3. Secure Data Storage: Ensure that customer records are stored securely in compliance with wider data protection requirements, such as the GDPR. Implementation of robust security measures, such as encryption, access controls, and regular data backups, to safeguard customer information from unauthorized access or breaches.</p> <p>4. Consent and Transparency: Obtain explicit consent from customers before recording their extra help needs, and clearly communicate how their information will be used and stored. Provide customers with access to their own records and options to update or remove their information as needed.</p> <p>5. Data Retention Policies: Clear policies for the retention and disposal of customer records, ensuring that data is retained only for as long as necessary and securely disposed of when no longer needed.</p> <p>6. Continuous Monitoring and Review: Continuously monitor and review data recording practices to ensure they remain compliant with data protection requirements and effectively meet the needs of customers requiring extra help. Gain feedback from customers and stakeholders to identify areas for improvement and address any concerns or issues that arise.</p>	<p>1. Compliance and Data Security Monitoring:</p> <ul style="list-style-type: none"> <li>Conduct regular audits to ensure adherence to GDPR and other data protection regulations.</li> <li>Monitor the effectiveness of security measures such as encryption and access controls.</li> </ul> <p>2. Training Effectiveness:</p> <ul style="list-style-type: none"> <li>Assess staff competency through periodic evaluations and knowledge assessments related to recording customers' extra help needs.</li> </ul> <p>3. Customer Feedback and Satisfaction:</p> <ul style="list-style-type: none"> <li>Gather feedback through surveys and interactions to evaluate customer satisfaction with the process of recording their extra help needs.</li> <li>Measure customer perceptions of transparency, consent practices, and data security.</li> </ul> <p>4. Internal Process Reviews:</p> <ul style="list-style-type: none"> <li>Regularly review internal procedures to ensure they align with regulatory requirements and industry best practices.</li> <li>Identify and address any gaps or areas for improvement in data recording and management practices.</li> </ul> <p>5. Feedback Utilisation:</p> <ul style="list-style-type: none"> <li>Analyse feedback from customers and stakeholders to identify trends, issues, and opportunities for improvement.</li> <li>Use insights from feedback to make necessary adjustments to data recording procedures and customer interaction policies.</li> </ul> <p>6. Impact Assessment:</p> <ul style="list-style-type: none"> <li>Evaluate the impact of data recording practices on the overall customer experience and operational efficiency.</li> <li>Measure improvements in meeting customers' extra help needs based on implemented strategies.</li> </ul>	<p>1. Ensuring Staff Adherence to Procedures: Ongoing training and reinforcement to consistently adhere to established procedures for recording and managing customer extra help needs.</p> <p>2. Data Security and Compliance: Maintaining compliance with evolving data protection regulations requires continuous monitoring and adaptation of security measures.</p> <p>3. Customer Consent and Transparency: Obtaining explicit consent from customers for recording their extra help needs and ensuring transparent communication about data usage can be complex and require clear, accessible information.</p> <p>4. Data Retention and Disposal: Establishing and enforcing policies for data retention and secure disposal to ensure that customer information is kept only for necessary periods and is properly disposed of when no longer needed.</p> <p>5. Monitoring and Evaluation Effectiveness: Developing robust monitoring mechanisms to effectively evaluate the impact of data recording practices on customer satisfaction, operational efficiency, and compliance with regulatory requirements.</p> <p>6. Feedback Integration and Improvement: Effectively integrating feedback from customers and stakeholders to identify areas for improvement in data recording processes and policies.</p> <p>7. Impact Assessment and Continuous Improvement: Conducting effective assessments of the impact of data recording practices on meeting customers' needs and ensuring continuous improvement based on assessment findings.</p>	<p>(1) PSR Targets are set as % of household properties:</p> <p>2024-25 - 12%</p> <p>2025-26 - 12.5%</p> <p>2026-27 - 13%</p> <p>2027-28 - 13.5%</p> <p>2028-29 - 14%</p> <p>2029-30 - 14.5%</p> <p>(2) Quality checks of customer communications managed and at a high quality level.</p>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
4.2	<b>Companies' records should be reviewed regularly to ensure they are up to date.</b>	Compliant	<p>1. Staff Training: Provide training to staff on the importance of reviewing and updating customer records with every interaction, emphasising the significance of accurate and up-to-date information for providing effective support and assistance.</p> <p>2. Continuous Improvement: Use insights gained from record reviews to identify areas for improvement in data collection, recording, and management processes. Implement changes or enhancements as needed to improve the accuracy, completeness, and timeliness of customer records.</p> <p>3. Our applications in the short term will include customer journeys that are triggered by data age ensuring that reviews are regularly undertaken and that regular check ins with customers occurs (including an annual statement of services following review). Where data fails to be revalidated then these will be manually reviewed by our customer team.</p>	<p>1. Training Effectiveness:</p> <ul style="list-style-type: none"> <li>Track completion rates of training programs.</li> <li>Assess staff competency through periodic evaluations and knowledge assessments related to data review and updating processes.</li> </ul> <p>2. Record Review Frequency:</p> <ul style="list-style-type: none"> <li>Monitor the frequency of record reviews to ensure they occur as scheduled.</li> <li>Track the number of records updated following each customer interaction and periodic reviews.</li> </ul> <p>3. Data Accuracy and Completeness:</p> <ul style="list-style-type: none"> <li>Conduct regular audits to assess the accuracy and completeness of customer records.</li> <li>Measure the percentage of records that are up-to-date and complete.</li> </ul> <p>4. Continuous Improvement Insights:</p> <ul style="list-style-type: none"> <li>Analyse insights gained from record reviews to identify trends, issues, and areas for process improvement.</li> <li>Implement a feedback loop for staff to suggest improvements and track the implementation of these suggestions.</li> </ul> <p>5. Customer Journey Applications:</p> <ul style="list-style-type: none"> <li>Track the effectiveness of customer journey triggers based on data age in initiating record reviews.</li> <li>Measure the timeliness and accuracy of manual reviews conducted by the customer team for records that fail automated revalidation.</li> </ul> <p>6. Customer Feedback:</p> <ul style="list-style-type: none"> <li>Collect feedback from customers on their experiences with record accuracy and support services.</li> <li>Use customer satisfaction surveys to gauge the impact of accurate record-keeping on service quality.</li> </ul>	<p>1. Training Consistency:</p> <ul style="list-style-type: none"> <li>Ensuring all staff receive consistent and comprehensive training on the importance of reviewing and updating customer records.</li> <li>Maintaining high levels of staff competency and understanding over time.</li> </ul> <p>2. Data Accuracy and Completeness:</p> <ul style="list-style-type: none"> <li>Ensuring that customer data collected and recorded is accurate, complete, and timely.</li> <li>Addressing discrepancies and gaps in data effectively.</li> </ul> <p>3. Customer Engagement:</p> <ul style="list-style-type: none"> <li>Achieving regular customer engagement to validate and update their records.</li> <li>Encouraging customers to provide accurate and timely information during interactions.</li> </ul> <p>4. Technology Integration:</p> <ul style="list-style-type: none"> <li>Implementing and maintaining effective technology solutions to trigger customer journey reviews based on data age.</li> <li>Ensuring seamless integration of manual and automated processes for record reviews.</li> </ul> <p>5. Continuous Improvement Implementation:</p> <ul style="list-style-type: none"> <li>Utilizing insights from record reviews to continuously improve data collection and management processes.</li> <li>Balancing the need for ongoing improvements with operational demands.</li> </ul> <p>6. Compliance with Data Protection Regulations:</p> <ul style="list-style-type: none"> <li>Ensuring all processes comply with GDPR and other data protection requirements.</li> <li>Maintaining data security and privacy during the review and updating processes.</li> </ul> <p>7. Feedback Utilisation:</p> <ul style="list-style-type: none"> <li>Effectively collecting and analysing feedback from customers and staff to drive improvements.</li> <li>Implementing changes based on feedback in a timely manner.</li> </ul> <p>9. Monitoring and Evaluation:</p> <ul style="list-style-type: none"> <li>Continuously monitoring the effectiveness of record review processes.</li> <li>Regularly evaluating and adjusting strategies to ensure records remain up-to-date.</li> </ul>	<p>(1) Data revalidation KPI Measure:</p> <ul style="list-style-type: none"> <li>Attempted contacts (90%)</li> <li>Actual contacts (35%)</li> </ul> <p>(2) % of households on PSR that have failed to revalidate and outside of time.</p>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
4.3	<b>Companies should consider how their records of customers' needs can be designed in a way that can help deliver wider benefits to their customers; for example, reducing communication burdens for customers through data sharing.</b>	Compliant	<p>1. Holistic Customer Profiles: Develop comprehensive customer profiles that capture not only their immediate needs but also relevant contextual information, preferences, and communication channels. This holistic approach ensures that support efforts are tailored to each customer's unique circumstances and reduces the need for repetitive data collection.</p> <p>2. Data Integration: Integrate customer records with other relevant data sources, such as billing history, service requests, and demographic information. This integration enables a more comprehensive understanding of customer needs and facilitates proactive support efforts.</p> <p>3. Consent-Based Data Sharing: Establish data sharing agreements with trusted partner organisations, subject to customer consent, to facilitate more coordinated support efforts and reduce communication burdens. For example, sharing information with local councils will streamline access to additional support services for customers in need.</p> <p>4. Cross-Industry Collaboration: Foster collaboration between different water companies to enable a more holistic and coordinated approach that deliver wider benefits to customers.</p> <p>5. Regular Data Analysis: Analyse customer needs records regularly to identify trends, patterns, and opportunities for improvement. Use insights gained from data analysis to refine support strategies, enhance service delivery, and address emerging needs proactively.</p> <p>6. Continuous Feedback Loop: Use customer feedback about their experiences with support services and communication processes. Use this feedback to iteratively improve the design and functionality of customer needs records and related support initiatives.</p> <p>7. Transparency and Accountability: Maintain transparency with customers about how their data is used and shared, and ensure accountability by adhering to relevant data protection regulations and ethical standards.</p>	<p>1. Holistic Customer Profiles:</p> <ul style="list-style-type: none"> <li>Regularly review and update customer profiles to ensure all relevant information is accurately captured and up-to-date.</li> <li>Track the completeness and comprehensiveness of customer profiles to measure improvements in data quality.</li> </ul> <p>2. Data Integration:</p> <ul style="list-style-type: none"> <li>Monitor the integration process to ensure customer records are successfully linked with other relevant data sources.</li> <li>Assess the impact of data integration on support efforts and service delivery through performance metrics.</li> </ul> <p>3. Consent-Based Data Sharing:</p> <ul style="list-style-type: none"> <li>Track customer consent rates for data sharing agreements with partner organisations.</li> <li>Monitor the effectiveness of data sharing arrangements in facilitating coordinated support efforts and reducing communication burdens.</li> </ul> <p>4. Cross-Industry Collaboration:</p> <ul style="list-style-type: none"> <li>Evaluate the outcomes of collaborative initiatives with other water companies to measure the benefits delivered to customers.</li> <li>Track participation levels and the success of joint efforts in addressing customer needs.</li> </ul> <p>5. Regular Data Analysis:</p> <ul style="list-style-type: none"> <li>Conduct periodic data analysis to identify trends, patterns, and opportunities for improvement.</li> <li>Measure the effectiveness of data-driven support strategies and their impact on service delivery.</li> </ul> <p>6. Continuous Feedback Loop:</p> <ul style="list-style-type: none"> <li>Collect and analyse customer feedback regarding their experiences with support services and communication processes.</li> <li>Track changes in customer satisfaction and use feedback to inform continuous improvements.</li> </ul> <p>7. Transparency and Accountability:</p> <ul style="list-style-type: none"> <li>Regularly review compliance with data protection regulations and ethical standards.</li> <li>Monitor communication practices to ensure customers are informed about how their data is used and shared.</li> <li>Conduct audits to ensure accountability and transparency in data handling and support efforts.</li> </ul>	<p>1. Data Quality and Completeness:</p> <ul style="list-style-type: none"> <li>Ensuring all relevant customer information is accurately captured and regularly updated.</li> <li>Overcoming potential data gaps and inconsistencies.</li> </ul> <p>2. Data Integration:</p> <ul style="list-style-type: none"> <li>Integrating disparate data sources effectively without causing data silos.</li> <li>Maintaining data integrity during integration processes.</li> </ul> <p>3. Customer Consent and Privacy:</p> <ul style="list-style-type: none"> <li>Obtaining and managing customer consent for data sharing in compliance with privacy regulations.</li> <li>Ensuring transparency in how customer data is used and shared.</li> </ul> <p>4. Cross-Industry Collaboration:</p> <ul style="list-style-type: none"> <li>Coordinating efforts and aligning objectives with other water companies and partner organisations.</li> <li>Managing potential conflicts of interest and differing priorities among collaborators.</li> </ul> <p>5. Customer Engagement and Feedback:</p> <ul style="list-style-type: none"> <li>Encouraging customers to provide feedback and engage with support services.</li> <li>Addressing and incorporating diverse customer needs and preferences.</li> </ul> <p>6. Monitoring and Evaluation:</p> <ul style="list-style-type: none"> <li>Developing effective metrics and KPIs to monitor the success of implementation efforts.</li> <li>Continuously improving processes based on insights from data analysis and customer feedback.</li> </ul>	<p>(1) Number of data shares in place to support customers for vulnerability and affordability</p> <p>(2) % of region covered by data shares split by Vulnerability and Affordability</p> <p>(3) Focus on data shares in regions where external data tells us of higher likelihood of vulnerability.</p>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
4.4	<b>In designing their approach to recording and, where relevant, sharing customer vulnerability data, companies should clearly explain to customers how their data will be used, including any choices available to them. Companies should take steps to understand how their customers who need extra help feel about the use of their data.</b>	Compliant	<p>1. Clear Communication: We prioritise clear and comprehensive communication with our customers regarding the use of their vulnerability data. This includes detailed explanations of why their data is being collected, how it will be used, and the benefits it will provide. We also inform customers about the measures we have in place to protect their data. We will look as to how we can simplify our privacy policy and utilise our PSR onboarding and PSR annual statement to better understand how we can share with customers how their data will be used to their benefit.</p> <p>2. Customer Choices: We ensure that customers are aware of the choices available to them concerning their data. This includes options to consent to or opt-out of certain types of data sharing, as well as the ability to update or withdraw their consent at any time. We provide easy-to-access channels for customers to express their preferences and make informed decisions.</p> <p>3. Training and Awareness: Our staff are trained to handle vulnerability data with the utmost care and sensitivity. Regular training sessions are conducted to ensure that our employees understand the importance of data protection and are equipped with the knowledge to manage this data responsibly.</p> <p>4. Data Security: We deploy robust data security measures to protect customer vulnerability data from unauthorised access, loss, or misuse. This includes encryption, secure storage solutions, and regular security audits to ensure compliance with data protection regulations.</p> <p>5. Collaborative Approach: When sharing customer vulnerability data is necessary, we do so with trusted partners and only after obtaining explicit consent from the customers. We ensure that our partners adhere to the same high standards of data protection and confidentiality.</p>	<p>1. Clear Communication:</p> <ul style="list-style-type: none"> <li>Track the clarity and effectiveness of communication through customer feedback surveys.</li> <li>Measure customer understanding of data use and protection via PSR onboarding.</li> </ul> <p>2. Customer Choices:</p> <ul style="list-style-type: none"> <li>Monitor the number of customers opting in or out of data sharing.</li> <li>Track customer interactions with preference management channels.</li> </ul> <p>3. Training and Awareness:</p> <ul style="list-style-type: none"> <li>Assess staff competency through regular evaluations and knowledge assessments on data protection practices.</li> <li>Monitor participation and completion rates of training sessions.</li> </ul> <p>4. Data Security:</p> <ul style="list-style-type: none"> <li>Conduct regular audits to ensure compliance with data protection regulations.</li> <li>Monitor the effectiveness of security measures such as encryption and access controls.</li> </ul> <p>5. Collaborative Approach:</p> <ul style="list-style-type: none"> <li>Track data sharing activities and ensure they are conducted with explicit customer consent.</li> <li>Regularly review and assess partners' adherence to data protection standards.</li> </ul>	<p>1. Ensuring Clear Communication:</p> <ul style="list-style-type: none"> <li>Overcoming complexity in explaining data use in a way that is easily understood by all customers.</li> <li>Continuously updating communication materials to reflect any changes in data use or policies.</li> </ul> <p>2. Managing Customer Choices:</p> <ul style="list-style-type: none"> <li>Balancing the need for comprehensive data with respecting customer preferences and opt-out choices.</li> <li>Keeping track of customer consent and preference updates in a timely and accurate manner.</li> </ul> <p>3. Maintaining Staff Training and Awareness:</p> <ul style="list-style-type: none"> <li>Ensuring all staff consistently participate in and retain information from regular training sessions.</li> <li>Keeping training materials up-to-date with the latest data protection regulations and best practices.</li> </ul> <p>4. Data Security:</p> <ul style="list-style-type: none"> <li>Implementing and maintaining robust security measures to protect against unauthorised access and data breaches.</li> <li>Regularly auditing and updating security protocols to stay ahead of potential threats.</li> </ul> <p>5. Coordinating with Partners:</p> <ul style="list-style-type: none"> <li>Ensuring partners comply with the same high standards of data protection and confidentiality.</li> <li>Monitoring and managing data sharing agreements to ensure they are always conducted with explicit customer consent.</li> </ul>	<p>(1) Customer complaints - relating to customers vulnerability data and usage</p> <p>(2) % of customers opting out of data sharing for vulnerability when they are able to.</p>



No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
5.1	<b>Companies should develop and maintain a vulnerability strategy setting out how they plan to support the extra help needs of their customer base.</b>	Compliant	<p>In our PR24 Business Plan we developed and outlined our vulnerability strategy which dealt with Accessibility, Protecting our customers and Affordability. The Strategy which was published set out clearly our intended service offering and critically assessed our performance, our strengths and our weaknesses.</p> <p>We had committed to a delivery plan that aligns with regulatory, stakeholder and customer perceptions having gathered insight and research to support that plan. We had committed to the publication of an updated strategy every 2 years that clearly outlines how our delivery plan adapts to ensure that we maintain the ongoing support meeting our customers needs.</p> <p>The abridged version of the Vulnerability Strategy that we have published alongside this document aligns with our overall ambitions and includes our key delivery plans, our short and long term high level improvements and what KPIs we will measure our success with. It includes key plans for:</p> <ul style="list-style-type: none"> <li>- Maintaining an industry Leading Identification of Vulnerable Customers</li> <li>- Developing our Tailored Support Service</li> <li>- Maintaining an effective Priority Services Register</li> <li>- Offering financial support and assistance</li> <li>- Developing effective teams along with training and development</li> <li>- supporting customer awareness and education</li> <li>- our approach to continuous Improvement and feedback</li> <li>- Using a data-driven approach</li> <li>- Providing emergency support</li> </ul> <p>Following publication of this document we will continue to engage both internally (with Board and Teams), with our Customer Scrutiny Panel and with local and national stakeholders to gain further feedback and insight into our strategy and plans.</p>	<p>1. Regular Strategy Updates:</p> <ul style="list-style-type: none"> <li>• Publish an updated vulnerability strategy every two years.</li> <li>• Review and adjust delivery plans based on regulatory, stakeholder, and customer feedback.</li> </ul> <p>2. Performance Tracking:</p> <ul style="list-style-type: none"> <li>• Measure KPIs related to identifying vulnerable customers, tailored support services, Priority Services Register effectiveness, financial support, team development, customer education, continuous improvement, data-driven approaches, and emergency support.</li> <li>• Regularly assess and report on these KPIs to ensure alignment with strategy goals.</li> </ul> <p>3. Stakeholder Engagement:</p> <ul style="list-style-type: none"> <li>• Continuously engage with the Board, internal teams, Customer Scrutiny Panel, and local and national stakeholders.</li> <li>• Collect and integrate feedback from these groups to refine and improve the vulnerability strategy and delivery plans.</li> </ul> <p>4. Customer Feedback and Insight:</p> <ul style="list-style-type: none"> <li>• Gather and analyse customer feedback to assess the effectiveness of support services and identify areas for improvement.</li> <li>• Use insights from customer interactions to enhance support offerings and communication strategies.</li> </ul> <p>5. Training and Development:</p> <ul style="list-style-type: none"> <li>• Monitor the effectiveness of staff training programs related to supporting vulnerable customers.</li> <li>• Ensure regular updates and improvements to training materials and sessions.</li> </ul> <p>6. Data-Driven Improvements:</p> <ul style="list-style-type: none"> <li>• Utilise data analytics to identify trends and gaps in service delivery.</li> <li>• Implement data-driven changes to improve the accuracy and effectiveness of support services.</li> </ul> <p>7. Continuous Improvement:</p> <ul style="list-style-type: none"> <li>• Regularly review internal processes and procedures to ensure they align with best practices and regulatory requirements.</li> <li>• Implement a feedback loop to continually adapt and improve the vulnerability strategy based on performance data and stakeholder input.</li> </ul>	<p>1. Complex Data Integration: Managing and integrating diverse customer data sources while adhering to GDPR presents technical and compliance challenges.</p> <p>2. Adapting to Regulatory Changes: Staying agile and adapting the vulnerability strategy and delivery plans to evolving regulatory frameworks and industry standards requires ongoing monitoring and proactive adjustments.</p> <p>3. Aligning Stakeholder Expectations: Balancing the varying expectations and priorities of regulatory bodies, stakeholders (including customers), and internal governance structures can pose coordination and alignment challenges.</p> <p>4. Effective KPI Development: Defining and implementing robust KPIs that accurately measure the impact and effectiveness of support services for vulnerable customers requires careful planning and stakeholder buy-in.</p> <p>5. Ensuring Data Privacy and Consent: Addressing concerns around data privacy, ensuring transparent communication with customers about data usage, and managing consent mechanisms effectively, especially in partnerships with third parties.</p> <p>6. Continuous Staff Training: Providing ongoing, effective training programs for staff to handle sensitive customer interactions and maintaining high service standards in supporting vulnerable customers.</p> <p>7. Engaging Stakeholders for Feedback: Actively engaging with internal teams, the Board, Customer Scrutiny Panel, and external stakeholders to gather feedback and insights, and integrating these inputs into strategy refinement and improvement processes.</p> <p>8. Cultivating a Culture of Continuous Improvement: Establishing and nurturing a culture within the organization that embraces continuous improvement based on performance data, customer feedback, and emerging best practices.</p>	<p>(1) Publication of a Final Draft Strategy by June 2025.</p> <p>(2) Reviewed Vulnerability Strategy published in line with commitment (2 yearly)</p>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
5.2	<b>Companies should take steps to understand the likely underlying requirements for extra help in their areas.</b>	Compliant	<p>1. Data Purchasing and Analysis: We acquire data from third parties to gain insights into the demographics, socio-economic status, and potential vulnerabilities of our customer base. This data includes information on income levels, age distribution, and other factors that can indicate a need for extra help. The purchased data is integrated with our existing customer data to create a comprehensive profile of our service areas. Advanced data analytics techniques are then used to identify patterns and trends that may indicate underlying needs for support. In addition to purchased data we utilise ONS data to support our understanding of the region and we have mapped key elements of insight to better understand</p> <p>2. Extensive Community Engagement: We collaborate with local charities, community groups, and social services to gain a deeper understanding of the needs within our communities. These partnerships allow us to tap into local knowledge and resources, ensuring that our support strategies are well-informed and effective. We actively participate in and host community events, workshops, and forums to engage directly with our customers. These events provide valuable opportunities to listen to the concerns and needs of vulnerable customers, gather feedback, and raise awareness about the support services we offer.</p> <p>3. Collaboration with Local Organisation: We work closely with local councils, charities and social care providers to identify customers who may benefit from extra help. By sharing relevant data (with appropriate consent) and coordinating support efforts, we can provide a more holistic approach to addressing customer vulnerabilities. Through these networks, we have established a referral process with these providers ensures that customers identified as needing extra help are quickly connected with the appropriate services and support.</p> <p>4. Use of Technology and Innovation: We utilise digital platforms, such as our CRM, website and Portal, to provide information on available support services and to facilitate easy access to help for those in need.</p> <p>5. Continuous Improvement: Our approach to understanding and supporting vulnerable customers is subject to regular review and adaptation. We analyse the effectiveness of our strategies and make necessary adjustments based on new data, feedback from customers, and changes in the external environment. We ensure that we stay updated with regulatory requirements and industry best practices to ensure our methods are in line with the highest standards of customer care and data protection.</p> <p>6. In the short term we will be looking at how data can be utilised directly in our customer applications to provide relevant insight about communities to support how we work with vulnerable customers in both incidents and also during our business plan activities.</p>	<p>1. Data Purchasing and Analysis: Utilise advanced analytics tools to regularly analyse third-party data insights. Measure the effectiveness of data integration in enhancing customer profiles and identifying trends related to vulnerability indicators.</p> <p>2. Extensive Community Engagement: Track engagement metrics from community events, workshops, and forums. Gather feedback from participants to assess the effectiveness of engagement efforts in understanding community needs and enhancing support strategies.</p> <p>3. Collaboration with Local Organisations: Monitor the referral process with local councils, charities, and social care providers. Evaluate the speed and effectiveness of connecting identified vulnerable customers with appropriate services. Measure the satisfaction and outcomes reported by customers and partner organisations.</p> <p>4. Use of Technology and Innovation: Measure user engagement metrics on digital platforms (CRM, website, portal). Track usage patterns and user feedback to assess the effectiveness of these platforms in providing information and facilitating access to support services for vulnerable customers.</p> <p>5. Continuous Improvement: Conduct regular reviews of support strategies based on feedback, data analytics, and regulatory changes. Measure the impact of strategy adjustments on customer satisfaction, service delivery efficiency, and alignment with industry best practices.</p> <p>6. Short-Term Focus on Data Utilisation: Evaluate the integration of data insights into customer applications and service delivery during incidents and routine business plan activities. Assess the effectiveness of data-driven insights in enhancing decision-making and improving support for vulnerable customers.</p>	<p>1. Data Integration and Accuracy:</p> <ul style="list-style-type: none"> <li>Ensuring seamless integration of third-party data with existing customer data.</li> <li>Maintaining data accuracy and up-to-date profiles amidst continuous data inflow.</li> </ul> <p>2. Community Engagement:</p> <ul style="list-style-type: none"> <li>Effectively reaching and engaging diverse community groups.</li> <li>Gathering and incorporating meaningful feedback from varied stakeholders.</li> </ul> <p>3. Collaboration with Local Organisations:</p> <ul style="list-style-type: none"> <li>Coordinating efforts and data sharing while maintaining data protection and privacy.</li> <li>Ensuring timely and effective referral processes with multiple partners..</li> </ul> <p>4. Continuous Improvement:</p> <ul style="list-style-type: none"> <li>Regularly adapting strategies based on dynamic customer needs and regulatory changes.</li> <li>Measuring the impact of changes</li> </ul>	<p>(1) Implement regional data into our customer applications to support incidents and day-to-day customer support.</p> <p>(2) Using mapping tools to identify stakeholders to seek feedback on vulnerability strategy</p>