



PORTSMOUTH WATER LIMITED

Vulnerability Strategy

SUPPORTING CUSTOMERS WHO NEED US MOST

At Portsmouth Water, we believe every customer deserves to feel supported, understood and treated with care, especially those in vulnerable circumstances. Whether due to age, disability, financial stress or a temporary life event, we know that some customers may need extra help to access essential services.

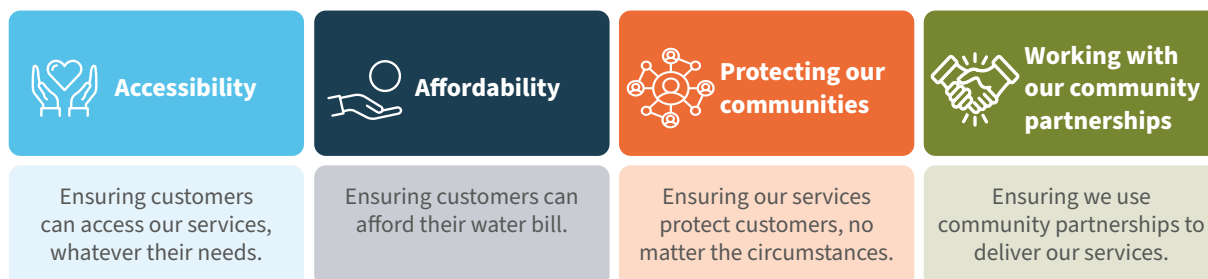
We are proud of the strong foundations we have already built. We consistently perform well in registering customers on our Priority Services Register and extending affordability support to those who need it. However, we know we must go further. This strategy sets out how we will strengthen the support we offer through a phased approach, outlining short, medium and long-term actions. It focuses on improving accessibility, tailoring communications, and embedding inclusive service into every customer journey.

We recognise that vulnerability can affect anyone, often in hidden or unexpected ways. That is why we are committed to ensuring every part of our service is designed with care, from how we communicate and respond during an incident to how we shape future services.

We also understand that external pressures such as the rising cost of living, climate change and the rollout of smart meters will create new challenges for many. We are committed to making sure our most at-risk customers remain protected before, during and after any transition. Our investment in smart technology offers new opportunities to improve support, and we will continue to explore these benefits.

This Vulnerability Strategy outlines the practical steps we will take, supported by a clear timeline of actions, to ensure no customer is left behind. It reflects our belief in the power of partnership and our commitment to working with local organisations to deliver meaningful support in our communities. Supporting customers in vulnerable circumstances is not a side programme. It is part of who we are.

We will support our customers in four key ways:



This document represents the final version of our Vulnerability Strategy, developed through a year of engagement with customers, community groups, local and national stakeholders, our Independent Challenge Group, Executive Team, and Board. Their collective input has helped shape a strategy that responds to both the challenges of today and the evolving needs of our communities.

While this is our published strategy, our approach will continue to evolve. We remain committed to listening and improving throughout AMP8, with regular oversight from our ICG, Executive Team, Board, and ESG Committee. Section 5 outlines how we will track our performance and maintain strong governance.

We want this strategy to be visible and accessible to all. Transparency matters, and we welcome feedback as we work to deliver the best support possible to those who need it.

If you have any comments or suggestions, please don't hesitate to contact me directly at:

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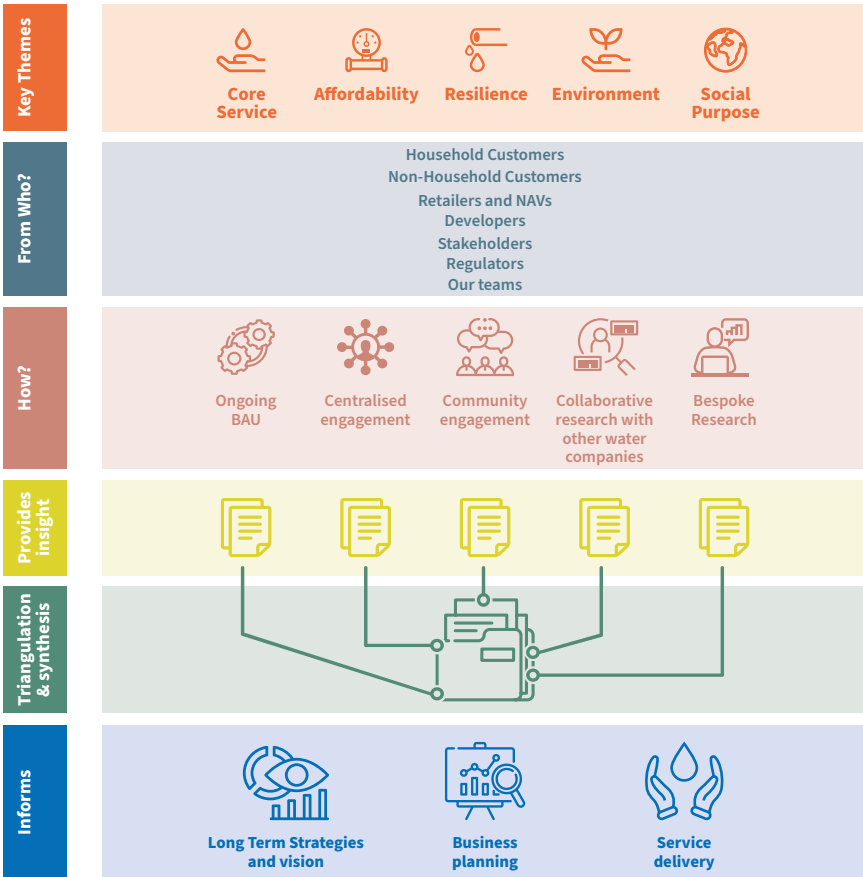


Matthew Hamilton
Chief Customer Officer

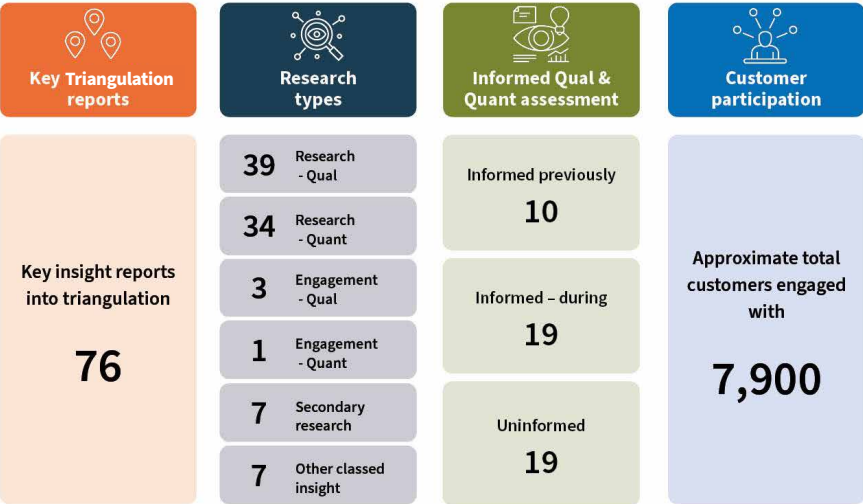
WHAT HAS INFORMED OUR STRATEGY SO FAR?

Our engagement strategy has helped us better understand the needs of the communities we serve and has been central to shaping this final strategy. This approach will continue to guide our engagement as we move into delivery, ensuring we remain responsive to customer needs and can adapt our plans as required throughout AMP8.

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



To inform our Business Plan submission to the regulator, we carried out extensive engagement through customer surveys and focus groups. These provided valuable insight into how we should shape and deliver our services. Our wider research, which covered both vulnerability and affordability, involved 7,900 customers.



Informed by insight

Ensuring that the service we deliver, both now and in the future meets the needs of all customers is critical. Since publishing our Draft Strategy in 2024, we've used a broad range of insight to develop and strengthen this final version. This includes:

- Input from our Vulnerability Sub-Group, part of the Independent Challenge Group (ICG), which has played a key role in shaping our thinking. The group has provided challenge, reviewed drafts, and explored how our vulnerability approach aligns with wider customer programmes, such as smart metering.
- Feedback and insight from our regulators and the independent consumer voice. Both Ofwat and the Consumer Council for Water (CCW) gave constructive feedback on our draft strategy, which has helped strengthen this final version. We also drew on research from both organisations involving vulnerable customers, which has enhanced and deepened our understanding.

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

- **External region-specific data** - e.g. ONS data on deprivation and disability.
- **External research and insight studies** - Typically national-level analysis on relevant topics, often including comparisons with other water companies, sectors, and third-sector organisations.
- **Portsmouth Water-commissioned research** - Surveys with our customers, covering affordability, bill preferences, and smart metering.
- **Stakeholder research** - Surveys and conversations with our local or national stakeholders.
- **Regulatory insight** - Data and comparisons from Ofwat, CCW, Ofgem, UKRN and UKWIR, covering both the water industry and wider energy sector.
- **Internal knowledge and experience** - Drawing on what our Community Team has learned through stakeholder engagement and customer data.

What do we know about our communities?



SECTION 1 - AFFORDABILITY

Portsmouth Water has long maintained the lowest average water bill in the UK, which is something we are particularly proud of. While this provides a strong foundation, we recognise that affordability is about more than just the average bill.

Data from the Office for National Statistics shows that around 52% of our customers live in areas classified as deprived, including communities such as Selsey and Havant. While this is broadly in line with national averages, our region includes pockets of severe deprivation. We are using improved data and mapping tools to better identify and target support where it is needed most.

We also recognise that many households face wider financial pressures, including rising living costs and higher wastewater charges from Southern Water. Our customer journeys must reflect this reality by identifying those at risk early and providing timely, effective support.

We are committed to helping prevent customers from falling into debt by offering the tools, services and partnerships they need to manage their bills. Our affordability support is designed to reach customers in water poverty, as well as those simply struggling to pay. This includes targeted approaches to reduce charges and close collaboration with trusted partners to deliver long-term solutions.



Reducing Usage

As our region is now classed as water stressed, we will need to install meters for the 70% of customers who are currently unmetered. This will help reduce consumption and give customers more control over their water use and bills. To support this, we will:

- Install smart meters across household properties to provide real-time usage data and support customer understanding
- Use this data to demonstrate how reducing water use can lower overall bills, including water, wastewater and energy costs
- Highlight how support tariffs, alongside personalised insights, can help make bills more manageable for financially vulnerable customers

Supplying Meters

We plan to provide meters for all our customers by 2035.

Customers will be able to have visibility and manage their usage through:



Smart meter data
– weekly, daily or hourly



Access to online data
and support

Helping Customers Reduce Consumption



Provide online tools and data visualisation to help customers understand and manage their water use more effectively.



Access to water efficiency devices that can be retrofitted.



Tailored customer communications that provide better usage data.



Water audits, including the supply and fitting of efficiency devices

Maintaining Our Low Debt Position

With the cost of living, energy, food and travel prices continuing to rise, we've worked hard to avoid increasing our bills and have maintained our position as offering the lowest water bills in England. We're also committed to keeping a low debt position to support our customers' financial wellbeing.

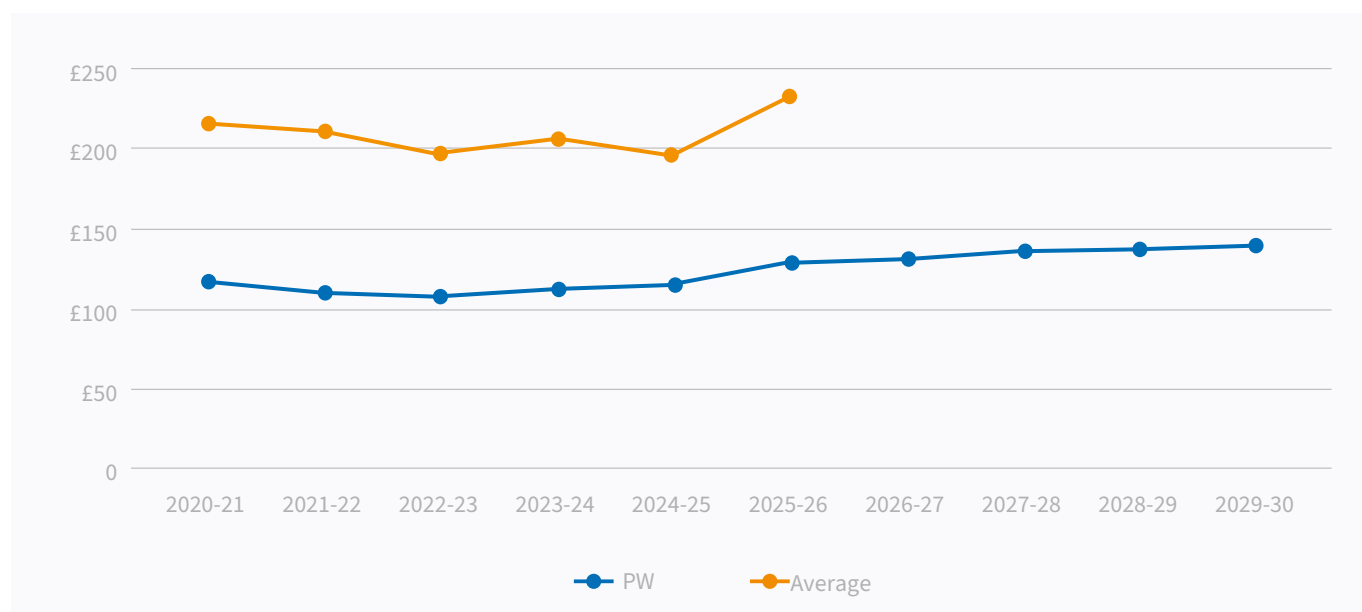
We will keep our bills low by:

- Being efficient in how we work
- Identifying where we can use more efficient long-term, nature-based solutions where they provide better value over time

This approach allows us to deliver affordable bills into the future while maintaining a low level of debt. Our charges remain the lowest in the industry for the same level of service.

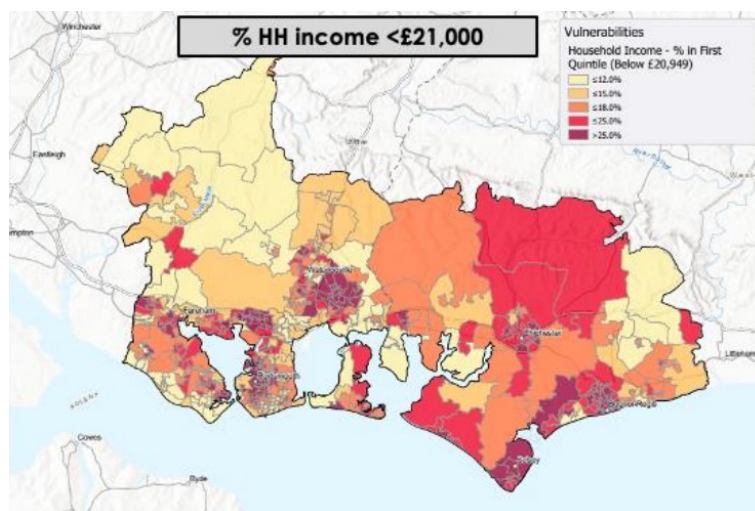
We've already delivered on this commitment, and our performance to date reflects this, as shown in the chart below:

AVERAGE WATER BILLS



Adapting Financial Support

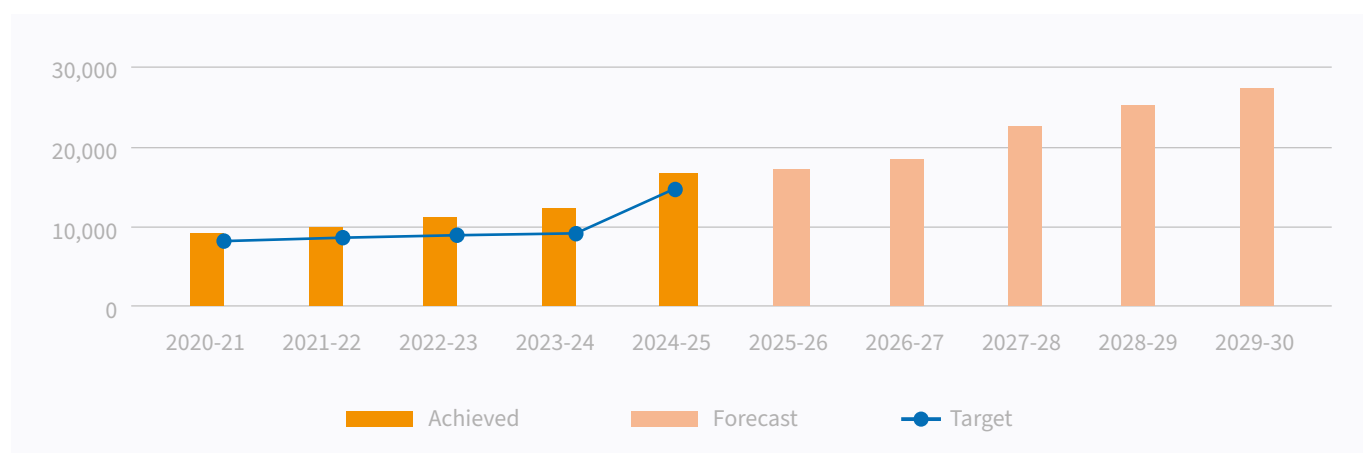
We already know that around 63,000 households in our region have an income below £21,000, making them potentially eligible for our affordability support tariffs.



(i) We will continue to provide affordability tariffs for customers

1 Low Income Social Tariff – This tariff reduces bills for eligible customers, whether they are metered or unmetered. We currently support 15,072 households through this scheme, which is above our forecast targets. Through ongoing promotion and awareness, we plan to nearly double this by 2030, reaching 27,500 households.

AFFORDABILITY (SOCIAL TARIFF)



Portsmouth Water continues to engage proactively with the industry, regulators and stakeholders to help shape the future design of affordability tariffs. We will also work constructively with Defra on their forthcoming review of a potential national social tariff, ensuring any future model reflects the needs of our customers and communities. We are already exceeding our current social tariff targets.

2 WaterSure Tariff – This tariff reduces bills for metered customers with medical conditions or disabilities that lead to higher water use. We aim to increase uptake to 500 customers. While this number may appear low, many eligible customers also qualify for our Social Tariff. Our approach is to always place customers on the lowest-cost tariff they are eligible for.

(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 new tariffs are inclusive by design, taking into account the needs of vulnerable customers, including those on support tariffs. We will actively consider how these customers can participate in water efficiency incentive schemes and, where needed, develop specific tariffs that complement the support already in place.

Using data to increase reach

To help as many eligible customers as possible, we are focusing on partnerships with third parties who can help identify those who qualify for support but are not currently receiving it.

Our approach involves working with a number of partners:

(a) Purchased data - Auto-enrolment of low-income households onto our Social Tariff

As part of our support for customers moving onto metered charges over the next eight years, we are piloting ways to automatically enrol customers onto our Social Tariff, based on the data we hold.

We have purchased property-specific data, including information on household size and income levels, which enables us to identify customers who are likely to be eligible. We will use this data during the metering rollout to auto-enrol these households, helping to ease short-term concerns around potential bill increases.

(b) Local Councils in our region

We already work closely with local authorities such as Portsmouth City Council and plan to extend this approach. We are exploring opportunities to share data in a secure and ethical way that allows us to identify and support joint customers who may benefit from our affordability schemes.

Establish local council data shares to help identify eligible customers

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. We are working with Portsmouth City Council to develop data sharing through the Digital Economy Act and expect that by the end of Summer 2025 this data sharing process will be functioning.

Work with the Department for Work and Pensions (DWP) to identify 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.

Explore cross-sector data sharing

We have already implemented data sharing for customer information on the Priority Services Register (PSR), working in partnership with SSEN, our regional energy network provider.

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 strengthen our relationship with customers by using smart meter data to help those facing affordability challenges. This includes:

- a. Provide monthly digital billing** - Helping customers to budget more effectively and avoid falling into arrears.
- b. Support customers to manage their usage** - Delivering clearer messaging via our customer platforms and working with local partners such as Citizens Advice to share practical tips and education.
- c. Real-time support** - Providing timely information about expected charges to avoid unnecessary credits or unexpected bills.
- d. Preventing self-disconnection** - Identifying customers who may be limiting essential water use due to cost concerns and offering proactive support.

Free water efficiency devices - We actively promote and provide free retrofit devices to help customers reduce their water use and lower bills. For customers in vulnerable circumstances, we also offer in-home visits to install these devices directly.

Leak repairs and allowances for vulnerable customers - We understand the stress that leaks can cause. For customers on our Priority Services Register, we offer:

- Free leak investigations when we suspect a leak is present
- Financial support for supply pipe repairs:
 - Up to £100 for repairs completed within 30 days
 - £50 if completed between 31 and 60 days
- Support for replacements:
 - £200 if completed within 30 days
 - £100 if completed within 60 days of identification



SECTION 2 - ACCESSIBILITY

At Portsmouth Water, we are committed to making our services accessible to every customer, whatever their circumstances. We know that delivering inclusive services starts with understanding the communities we serve.

Our region has a higher proportion of customers over the age of 65 compared to the national average. Insights from our partners suggest that around 1% of our population cannot read English or may struggle with literacy, 18% identify as disabled, and 7% come from ethnically diverse backgrounds. These figures highlight the need for services that are easy to access, navigate and understand.

We are investing in smart systems and digital tools that help us more effectively identify individual needs and provide tailored support. From accessible communication channels to empathetic service delivery, we aim to remove barriers and ensure every customer has a positive experience.

To bring this to life, our strategy focuses on removing barriers, improving communication, and making our services easier to access for everyone. The following sections outline the actions we are taking to deliver this.



To support customers with accessibility challenges, we are focusing on six core areas that aim to remove barriers and promote inclusion:

- **Identifying customers who need support** - using data and insight to proactively reach those who may need tailored services.
- **Understanding service needs** - engaging with customers and partners to shape services that reflect real-life circumstances.
- **Keeping it simple** - using clear, jargon-free language across all channels.
- **Access to information in the community** - working with trusted partners to share information in familiar, accessible places.
- **Understanding service benefits** - ensuring customers know what support is available and how it can help.
- **Enabling participation in water efficiency schemes** - making sure accessibility needs don't prevent customers from reducing usage and saving money.

Communicating with our customers

Channel Choice – We will continue to offer a broad range of contact options to suit customer preferences. This includes digital, non-digital, and face-to-face support for those who visit our Head Office reception with questions about their bills or water supply.

We recognise that many customers, especially those needing extra support, value the ability to choose how they interact with us. Whether it is writing a letter, using a digital service, or receiving information in their preferred format, our commitment is to make all channels equally effective. Traditional methods such as phone and post will continue to offer the same high-quality service as newer digital platforms.

Customers will always have the right to choose how they are contacted by us, and we will continue to adapt our services to meet their individual needs.

Developing new channels – We will continue to develop new channels for our customers, providing them with more choice 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 most appropriate option and we will continue to make this available.

Easy-to-access digital channels – We will ensure our digital platforms are inclusive by design and meet recognised accessibility standards. This includes a medium-term goal of achieving the ‘AA’ standard under the Web Content Accessibility Guidelines (WCAG), which are internationally recognised benchmarks for digital accessibility. Meeting this level will ensure our website is usable for people with a wide range of needs, including those with visual, cognitive, and physical impairments.

Being 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 and will be preparing ourselves to gain this accreditation by October 2026.

Improving our accessibility – We aim to reduce the need for additional support by minimising friction across all of our customer channels. Our digital services include ReciteMe, which allows customers to access support in alternative languages and formats. We also offer large print and braille communications to ensure our services are accessible to all.

Over the next two years, we will improve our accessibility by expanding the ways customers can interact with us, including:

- Providing access to British Sign Language (BSL) services for customers who use sign language
- Offering translator support for customers who may struggle to read or speak English (around 1% of our customer base)

SECTION 2 - ACCESSIBILITY

Identifying those who need our support

We will expand our data sharing opportunities to connect with customers who may be unaware of their eligibility or support. 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.

Automating the sharing of data with the Energy Sector - In 2024–25, we played an active role as industry funders and contributors to the development of Priority Services Register (PSR) data sharing through the Energy Markets Data Centre. Using a consistent and standardised data flow improves the accuracy and consistency of shared data and allows us to automate key processes that better identify and support vulnerable customers.

Using our water efficiency devices

We recognise that not everyone has the skills, tools or financial flexibility to carry out home improvements or install water-saving devices themselves. To support our vulnerable customers, we will offer free in-home water efficiency audits and install suitable retrofit devices where needed. This ensures everyone can play a part in reducing water use, regardless of their circumstances or ability.

Helping our customers understand the support available

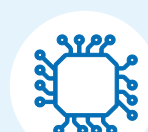
Customers don't often need to use our support services, so it's easy for them to forget what help is available when something does go wrong. To help them understand their entitlements and protections, we will:



Tailor our services to meet the specific needs of customers



Enhance the onboarding journey by clearly outlining available support



Collaborate with stakeholders to build understanding of service benefits

Us going to customers, not customers coming to us!

We will continue to strengthen the role of our community-based teams, proactively engaging with households to raise awareness, enrol customers onto support schemes, and explain how we can help.

Smart water meter rollout

We recognise that the introduction of smart meters is a significant change for all customers, but especially for those in vulnerable circumstances. Our rollout programme will embed tailored support from the outset to ensure no one is left behind. We will provide a range of measures to support customers with additional needs, including:

- **Tailored communications** to ensure that messaging is accessible, easy to understand, and clearly explains what smart metering means for them.
- **Face-to-face support** through our community teams, offering face-to-face conversations where customers or family members may need extra reassurance or help understanding the changes.
- **Auto-enrolment onto our Social Tariff** for eligible households, based on occupancy and income data, with mirrored support applied to wastewater charges through Southern Water where possible.
- **12-month post-installation usage monitoring** for customers in vulnerable circumstances, to help track any changes in water use and prevent unexpected bill impacts.
- **Leak detection and repair assistance**, including priority investigations and financial support for eligible customers.
- **Water efficiency support**, including tailored advice, in-home visits, and the installation of retrofit devices where appropriate.
- **Exploring wider benefits of smart meter data**, such as identifying changes in usage that may indicate welfare concerns or risk, enabling more proactive support.

Keep the message simple

We'll make sure our customer communications about support schemes are easy to understand by:

- Avoiding technical language
- Working with external stakeholders to improve how we explain things
- Making our customer journeys inclusive by design

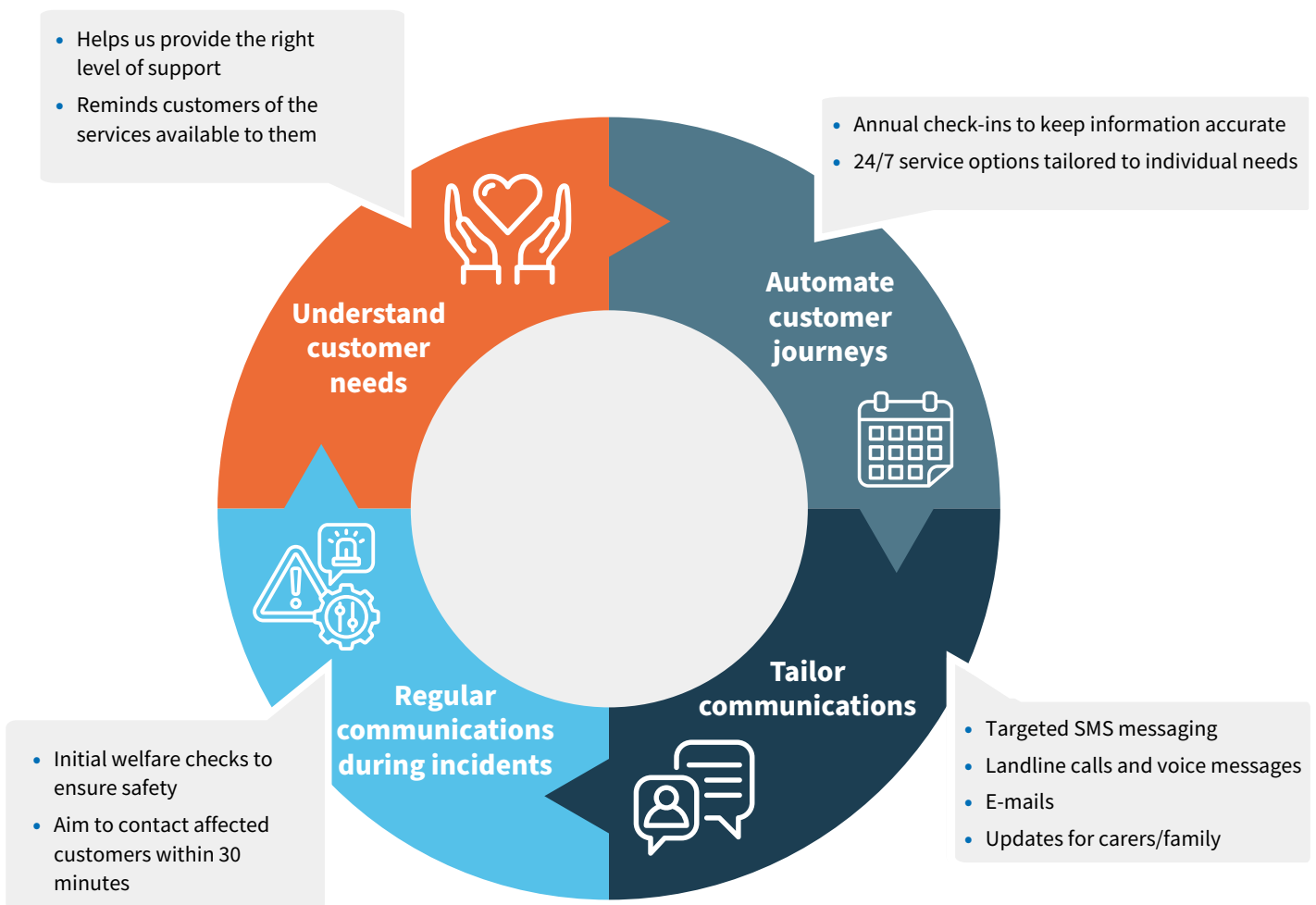
SECTION 3 - PROTECTING OUR COMMUNITIES

Customers rely on us most during times of disruption, whether that is a burst pipe, a cyber incident or extreme weather. These risks are becoming more common across the industry, with high-profile events such as the cyber attack in Devon affecting communities beyond the immediate area. In today's connected world, incidents outside of our direct control can still shape how customers feel about the reliability of their water supply.

To respond effectively, we are investing in smarter systems and digital platforms that allow us to communicate quickly and clearly. This includes improving how we use social media and digital alerts to provide real-time updates, particularly for customers in vulnerable circumstances who may need extra reassurance or have limited access to online services. Our goal is to become more proactive in our communications, reducing anxiety and making sure customers know what is happening, what they need to do, and where they can go for help.

Communicating when things go wrong

During the rare occasions when our customers experience a disruption to their water supply, we recognise that those in vulnerable circumstances may feel heightened anxiety and be more severely impacted than others. To help reduce this impact, we are designing end-to-end customer journeys that offer timely, clear and compassionate support. The graphic below sets out the key elements of this approach.



Developing regional insight to help us manage risks

We understand that incidents can cause stress and anxiety to customers whose circumstances make them vulnerable and we have significantly increased our number of customers registered on our Priority Services Register.

For many years we have ensured that we deliver bottled water during supply interruptions and ensured that we provide incident communications through Social Media. As a smaller water company our teams have a strong awareness and understanding of the communities that we operate in but we wish to become more consistent in how we deliver our services.

We will enhance our service provision through the following actions:

(i) Identify potential hotspot regions

Using data such as ONS deprivation data and vulnerability data we will better understand the risk communities in our region to better understand when we have incidents on how we may be causing hidden impacts on the communities to ensure 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) Making customers aware of the service they can expect

Using PSR data, we will ensure that customers clearly understand the support they can expect from us. From the moment they register, our new customer systems will explain the tailored service bundle they will receive, based on their individual PSR needs. We will also provide regular reminders to ensure customers remain aware of the services available to them.

(iii) 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 pro actively provide standby assistance when customers notify us of their overnight support needs.

(iv) Increased communications

Again, our new customer system capability will enable us to deliver enhanced digital communications and in the next two years we will enhance and increase the incident communications that we provide to our PSR customers who qualify through their tailored service bundle. We expect to deliver in the long run hourly update emails or SMS messaging to those customers.

We will also look to provide PSR customers with the ability to flag that they are at risk during an incident allowing us to provide targeted support when required, we will work with our systems and customers to determine the best way to do this.

(v) Partnership with local stakeholders

Local stakeholders play an important role in helping us amplify our messaging during incidents. We will strengthen our partnerships with local councils and community organisations, including vulnerability-focused groups, to ensure our incident communications reach affected areas quickly and effectively.



SECTION 4 - WORKING WITH OUR PARTNERS

Partnerships that support our customers

We know we can't do this alone. To provide the right support, we need to work closely with those in our communities who have lived experience and work directly with vulnerable people every day. Local stakeholders, charities and community organisations are essential to helping us reach those most in need.

We already partner with over 60 organisations and use their feedback to assess how well our services are working. Looking ahead, we'll continue to strengthen these relationships and develop new ones.

Improving our understanding of who our stakeholders are—and how best to work with them—is key to delivering better outcomes for vulnerable customers.

We will focus on partnerships across three core areas:



In 2024-25 in a survey of the vulnerability stakeholders that we work with, we achieved our highest ever satisfaction score with the services that we offer achieving 87% of stakeholders being satisfied or very satisfied.

We believe that these relationships are critical to supporting the improvements that we wish to achieve for our vulnerable customers and we have already explained in other areas of our strategy how we can work through these relationships to maximise our services.

We have already established a number of key relationships, but we know we can do more. Our objective is to develop our stakeholder approach to:

- i) **Increase partnerships** - We are committed to expanding our partnerships and have invested in a focused community team to accelerate this work. Our aim is to collaborate towards joint outcomes that support vulnerable customers.
- ii) **Support local initiatives** - We will continue to grow our emphasis on local community engagement, particularly with initiatives that reach hard-to-reach groups. This includes warm spaces, foodbanks, and other community support networks. We will prioritise stakeholders who hold trusted relationships with our customers such as charities, medical providers (GPs and health centres), faith groups, and local government teams.
- iii) **Work with CCW and our regulator** - We value our ongoing engagement with CCW and our regulators and believe that vulnerability is an area where deeper collaboration can drive even greater improvements. Their perspective plays an important role in shaping how we continue to evolve our support.

Our stakeholder strategy focuses on four key outcomes that will help us deepen impact and deliver better support for vulnerable customers:

**Grow
our
partnerships**

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

**Support
community-led
initiatives like
warm spaces**

**Empower
partners to act
for
our customers**

SECTION 5 - CONTINUING TO IMPROVE SERVICES

Measuring our progress is essential to delivering this strategy and achieving its objectives. To support this, we have developed a set of key performance measures that will provide regular insight into how effectively we are supporting customers in vulnerable circumstances.

Alongside these measures, we have put in place a strong governance framework to ensure accountability and drive continuous improvement. This includes:

(1) Internal governance

- **Vulnerability Delivery Group** - a quarterly forum to review delivery against key measures and milestones in our roadmap
- **Board reporting** - regular reporting to our Board on performance against key vulnerability commitments
- **Executive oversight** - regular review of progress by our Executive Team to ensure alignment with strategic priorities
- **ESG Committee** - oversight of our vulnerability strategy as part of wider social and governance performance

(2) External governance

- **Independent Challenge Group: Vulnerability Sub-Group** - ongoing review of our progress, impact, and areas for improvement
- **CCW and Ofwat engagement** - regular dialogue to test our approach, benchmark against industry standards, and respond to regulatory expectations
- **Accreditation audits** - assessed against the ISO 22458 Inclusive Service Standard to ensure we meet recognised benchmarks

As part of our commitment to continuous improvement, we have developed a roadmap setting out when key improvements for customers in vulnerable circumstances will be delivered. The roadmap is structured around three time horizons: short-term (within 12 months), medium-term (13–36 months), and long-term (beyond 36 months). Some activities are also identified as bridging actions — essential steps that prepare the ground for future ambitions.

OUR SHORT TERM INITIATIVES (NEXT 12 MONTHS)

SHORT TERM	
DATA SHARING AGREEMENTS TO 'AUTO-ENROL' CUSTOMERS	<ul style="list-style-type: none"> • Data Sharing with Portsmouth City Council underway by end of Summer 2025 • Approach all other relevant local Councils to follow the model created with Portsmouth City Council by March 2026 • Begin integrating DWP data into vulnerability registration.
IMPLEMENT PROTECTION FROM WATER POVERTY TO THOSE IMPACTED BY OUR	<ul style="list-style-type: none"> • Pilot our 'auto-enrolment' water poverty support model using purchased data. This bridging activity will lay the foundation for a wider rollout."
PROVIDE VULNERABILITY SUPPORT TO CUSTOMERS DURING SMART METER ROLLOUT	<ul style="list-style-type: none"> • Run face-to-face events in local areas where meters are being installed, increasing our visibility and support in the community • Ensure community teams are available to speak directly with customers by phone throughout the metering transition • Launch tailored support packages for vulnerable customers, including both rollout assistance and ongoing support once meters are installed
PSR ONBOARDING	<ul style="list-style-type: none"> • Introduce simpler and more accessible ways for PSR customers to update us when their needs or circumstances change.
INCREASE VULNERABILITY PARTNERSHIPS	<ul style="list-style-type: none"> • Map and engage new local and national vulnerability partners, including those who can support customers' mental health needs.
INCREASE ONLINE SUPPORT	<ul style="list-style-type: none"> • Launch online signposting to support from local and national partners. • Enable trusted third parties to register customers on the PSR (bridging until long-term solution is in place)
INCIDENT MANAGEMENT COMMUNICATIONS	<ul style="list-style-type: none"> • Development of broader incident management communications through our customer systems including increased PSR customer communications – (bridging activity until more tailored approach developed)
ACCESSIBILITY ACCREDITATION	<ul style="list-style-type: none"> • We will be starting to align our Quality Management System to fully meet the requirements of ISO22458 enabling achievement of accreditation in the medium term (Bridging activity)
KEEPING IT SIMPLE	<ul style="list-style-type: none"> • Review all new customer communications to ensure messages are clear and easy to understand (bridging activity). • Addition of access to British Sign Language Services • Addition of access to wider translation services.

SECTION 5 - CONTINUING TO IMPROVE SERVICES

OUR MEDIUM TERM INITIATIVES (13-36 MONTHS)

MEDIUM TERM	
SUPPORTING CUSTOMERS IN PAYMENT DIFFICULTY	<ul style="list-style-type: none"> Work with local partners, including Citizens Advice, to provide early support for customers at risk of falling into debt. This will include practical water-saving advice to help reduce bills and prevent financial difficulty.
STAFF DEVELOPMENT ON VULNERABILITY	<ul style="list-style-type: none"> Deliver targeted training for customer-facing staff to ensure they can support vulnerable customers with empathy and consistency, and confidently identify and respond to signs of hidden vulnerability.
IMPROVED ACCESSIBILITY TO VULNERABILITY SERVICES THROUGH PARTNERSHIPS	<ul style="list-style-type: none"> Develop capability to let trusted partners register customers on our PSR on their behalf.
IMPLEMENTATION OF PSR DATA SHARING WITH THE ENERGY SECTOR	<ul style="list-style-type: none"> Continue developing data-sharing to and from the energy sector via the Electralink dataflow.
ENHANCEMENT OF OUR CREDIT MANAGEMENT JOURNEYS	<ul style="list-style-type: none"> Building on our existing tailored customer journeys we will continue to develop our approach including the use of data. Tailored enhancements relating to the earlier identification of those customers struggling to pay
PSR ONBOARDING	<ul style="list-style-type: none"> Tailor communications to enable customers to better understand their specific tailored benefits
AFFORDABILITY TARIFF DEVELOPMENT	<ul style="list-style-type: none"> To identify and undertake the necessary research to assess whether the design of our Social Tariff should be adapted, and to act on the key findings. Better understand longer term impacts of water poverty and metering impacts
INCIDENT MANAGEMENT COMMUNICATIONS	<ul style="list-style-type: none"> Tailored PSR and Affordability Communications relating to incident management including the ability for customers to flag simply with us that they are concerned or at risk
ACCESSIBILITY	<ul style="list-style-type: none"> Achieve accreditation of ISO22458 relating to vulnerable customers
INCREASE ONLINE SUPPORT	<ul style="list-style-type: none"> Develop an online vulnerability Hub on our customer systems.
KEEPING IT SIMPLE	<ul style="list-style-type: none"> We will undertake a full communications and messaging review to ensure that customer journeys are frictionless and understood.
DIGITAL CAPABILITY IMPROVEMENT	<ul style="list-style-type: none"> Achieve WCAG 'AA' Standard for customer facing digital platforms.

OUR LONG-TERM INITIATIVES (36+ MONTHS)

LONG TERM	
AI AND MACHINE LEARNING TO ENHANCE SUPPORT	<ul style="list-style-type: none"> Explore how emerging technologies, including generative AI and machine learning, can simplify access to support, personalise customer journeys, and reduce friction across channels. Ensure all developments are ethical, inclusive, and designed to enhance rather than replace human-led service.
OPEN DATA INTEGRATION	<ul style="list-style-type: none"> Engage in future open data programmes to share and receive customer vulnerability indicators from trusted sources (e.g. energy, local government, housing). Contribute to industry innovation around ethical data sharing for better-targeted support.
NEXT-GENERATION PARTNERSHIPS	<ul style="list-style-type: none"> Develop new partnership models that go beyond referrals, including co-designed services with health, housing, and financial inclusion providers. Pilot embedded support services within our digital platforms and frontline operations.
EVOLUTION OF SOCIAL SUPPORT MODELS	<ul style="list-style-type: none"> Test long-term affordability mechanisms linked to real-time usage, income profiles, or life events. Explore adaptive tariff models and sustainable funding routes that evolve with customer needs.
PREDICTIVE PERSONALISATION	<ul style="list-style-type: none"> Move towards predictive service design using life-stage, household and usage data to anticipate support needs before customers reach crisis points. Tailor engagement and advice across all customer journeys, building on vulnerability flags and previous interactions.

SECTION 6 - HOW WE WILL MEASURE SUCCESS

Setting clear, measurable targets is critical to tracking our progress. The following measures will guide our delivery and performance for customers in vulnerable circumstances:

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

Internal ambitions to stretch performance

- 1. PSR registration** - Given the strong progress already made, we are setting a more ambitious internal target of 25% of households registered on the PSR by March 2030.
- 2. Stakeholder satisfaction** - We will maintain an internal ambition of 85% satisfaction for stakeholders working with us on vulnerability. While we saw some dip in recent years, our latest performance has exceeded this goal—and we now aim to sustain that level consistently.



No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
1.1	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.	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. Proactive Outreach: Identify vulnerable customers, such as the elderly or those with medical conditions, and establish proactive 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 & 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. Proactive 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 authorised 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:</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) Customer Satisfaction of customers on PSR and Affordability Support - to be now lower than typical customers.</p> <p>(3) Satisfaction of vulnerability stakeholders:</p> <p>2024-25 - 71%</p> <p>2025-26 - 71%</p> <p>2026-27 - 73%</p> <p>2027-28 - 75%</p> <p>2028-29 - 75%</p> <p>2029-30 - 75%</p> <p>(4) Annual incident event simulation - 1 per year</p> <p>(5) Stakeholder mapping:</p> <p>- increasing number of stakeholders annually (to 2030)</p> <p>- maturity assessment score improvement annually (to 2030)</p>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
1.2	Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.	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 proactively 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, affluency, 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 use ReciteMe 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"> Ensuring survey participation and focus group engagement from a diverse cross-section of customers to gather comprehensive feedback. Effectively interpreting feedback to make meaningful adjustments to communication, which may require iterative testing and refinement. <p>2. Visual Aids:</p> <ul style="list-style-type: none"> Creating visual aids that are universally comprehensible, catering to a wide range of literacy levels and cultural backgrounds. Ensuring follow-up surveys reach and are completed by a representative sample of customers to accurately assess comprehension improvements. <p>3. Step-by-Step Guidance:</p> <ul style="list-style-type: none"> Accurately tracking the number of successful support accesses and ensuring that customer satisfaction ratings reflect the true impact of the guidance provided. Identifying specific areas where the guidance needs improvement without overwhelming customers with too much information. <p>4. FAQs and Troubleshooting Guides:</p> <ul style="list-style-type: none"> Continuously updating FAQs and troubleshooting guides to reflect the latest customer issues and company policies, which can be resource intensive. Ensuring customers use these resources effectively and consistently measure their impact on reducing customer service calls. <p>5. Personalised Support:</p> <ul style="list-style-type: none"> Collecting and analysing demographic-specific data while respecting customer privacy and data protection regulations. Customising support materials to meet the diverse needs of various customer segments without introducing complexity that may confuse some customers. <p>6. Feedback Mechanisms:</p> <ul style="list-style-type: none"> Encouraging customers to provide honest and constructive feedback through surveys, focus groups, and interactions with customer service. implementing a continuous improvement process that can quickly adapt to feedback and show tangible improvements without long delays. 	<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:</p> <p>2024-25 - 71%</p> <p>2025-26 - 71%</p> <p>2026-27 - 73%</p> <p>2027-28 - 75%</p> <p>2028-29 - 75%</p> <p>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"> • 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. • 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. 	<p>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.</p> <p>2. Complex Customer Needs: Vulnerable customers have diverse and sometimes complex needs that may require personalised solutions. Balancing standardised 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)</p> <p>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.</p> <p>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.</p>	(1) Water Labs vulnerability support experiments of 2 per year.

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
1.4	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.	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"> • 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. • 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. • 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. • 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. 	<p>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.</p> <p>2. Technology Infrastructure: Ensuring the technologies work seamlessly together and are scalable can be complex.</p> <p>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.</p> <p>4. Data Privacy and Security: Handling sensitive customer data in compliance with GDPR requires stringent measures for data security and privacy.</p> <p>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.</p> <p>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.</p>	<p>(1) Customer Satisfaction of customers on PSR and Affordability Support - to be now lower than typical customers.</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) 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.</p>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
2.1	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.	Compliant	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.	<ul style="list-style-type: none"> • Feedback Collection: 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. • Performance Metrics: 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. • Community Engagement Evaluation: 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. • Accreditations and Standards: 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. • Ongoing improvement: We have made customer segmentation a key part of our experiment delivery through our Water Labs innovation collaboration. 	<ol style="list-style-type: none"> 1. Data Collection and Integration: 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. 2. Feedback Accuracy and Reliability: 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. 3. Performance Metric Definition: 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. 4. Community Engagement Effectiveness: 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. 5. Training and Engagement: 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. 6. Data Privacy and Security: Handling sensitive customer data in compliance with GDPR requires stringent measures for data security and privacy. 	(1) In the longer term implement improved segmentation insight into relevant reporting and governance.

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
2.2	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.	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 face-to-face 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"> • 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. • 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. • 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. • 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. • 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. • 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. 	<ol style="list-style-type: none"> 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. 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. 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. 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. 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. 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 organisational goals. Ensuring these metrics accurately reflect customer preferences and service quality is essential for informed decision-making. 	<p>(1) The number of channels offered to customers for communications.</p> <p>(2) Analysis of Customer Satisfaction of vulnerable customers relating to customer communication by channel.</p> <p>(3) Number of customers using our nominee services.</p>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
2.3	Companies should consult with CCW, and engage with stakeholders and other customer representatives, when making significant changes to their proposed service offering around vulnerability.	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"> - Our Compulsory Smart Metering Programme - Customer approach, policies and tariff approaches coupled with insight. - Significant changes to our debt management process including tailored customer journeys 	<p>1. Consultation Effectiveness:</p> <ul style="list-style-type: none"> • 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. • Surveys and Interviews: Conducting surveys and interviews to gauge satisfaction levels and gather specific feedback on consultation processes and outcomes. <p>2. Stakeholder Engagement:</p> <ul style="list-style-type: none"> • Engagement Metrics: Tracking participation rates and engagement levels of stakeholders, including the Independent Challenge Group (Customer Scrutiny Panel for PWL), local councils, and Citizens Advice. This helps assess the breadth and depth of stakeholder involvement. • Feedback Analysis: Analysing stakeholder feedback to identify common themes, concerns, and suggestions related to vulnerability strategies and service changes. <p>3. Compliance and Alignment:</p> <ul style="list-style-type: none"> • 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. 	<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	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.	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 face-to-face 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"> • 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. • 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. • 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. • 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. • 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. • 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. 	<ol style="list-style-type: none"> 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. 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. 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. 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. 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. 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. 	(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	Companies should take active steps to identify customers who require extra help who have not yet been identified.	Compliant	<p>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>	<p>1. Performance Metrics and KPIs:</p> <ul style="list-style-type: none"> 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. Conversion Rates: Monitoring conversion rates from outreach efforts to determine the effectiveness of our communication and engagement strategies in reaching vulnerable individuals. Customer Engagement: Tracking customer engagement levels with our support services post-identification to assess satisfaction and utilisation rates. Number of data shares in place and % of region covered by data shares. <p>2. Feedback Mechanisms:</p> <ul style="list-style-type: none"> 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. 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. <p>3. Data Analysis and Reporting:</p> <ul style="list-style-type: none"> Regular Data Reviews: Performing regular reviews of customer data analytics to evaluate the accuracy and reliability of vulnerability indicators used for identification. 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. <p>4. Continuous Improvement:</p> <ul style="list-style-type: none"> 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. 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. 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 <p>5. Compliance and Alignment:</p> <ul style="list-style-type: none"> Regulatory Compliance: Ensuring that monitoring activities align with regulatory requirements and Ofwat guidelines related to customer vulnerability and support services. Audit and Review: Conducting periodic audits and reviews of monitoring processes to ensure adherence to established standards. 	<p>1. Data Collection and Accuracy:</p> <ul style="list-style-type: none"> Ensuring the accuracy and reliability of customer data used to identify potential indicators of vulnerability. Balancing the need for detailed customer data with privacy concerns and regulatory requirements for data protection. <p>2. Engagement with Hard-to-Reach Customers:</p> <ul style="list-style-type: none"> Effectively reaching vulnerable individuals who may not engage with traditional communication channels or who are wary of outreach efforts. Addressing barriers such as language differences, digital literacy, and cultural differences that may prevent vulnerable customers from accessing support services. <p>3. Collaboration with Community Organisations:</p> <ul style="list-style-type: none"> Coordinating efforts with multiple community organisations, local authorities, and social services to ensure a unified approach. Maintaining consistent communication and support messaging across different partners. <p>4. Customer Feedback:</p> <ul style="list-style-type: none"> Encouraging participation in surveys and feedback sessions from vulnerable customers who may be reluctant to share their experiences. Analysing qualitative feedback to derive actionable insights can be complex and time-consuming. <p>5. Data Analysis and Reporting:</p> <ul style="list-style-type: none"> Identifying trends and patterns in customer data that accurately reflect emerging needs and vulnerabilities within the customer base. Ensuring that data analysis methods and tools are continuously updated to reflect the latest best practices and technological advancements. <p>6. Continuous Improvement:</p> <ul style="list-style-type: none"> Translating insights from monitoring activities into actionable improvements that can be implemented effectively. Providing ongoing training and development for staff based on evolving customer needs and feedback. <p>7. Emerging Technologies:</p> <ul style="list-style-type: none"> Evaluating and integrating new technologies aimed at increasing customer awareness can be resource-intensive and may require significant changes to existing systems and processes. Continuously assessing the effectiveness and feasibility of emerging technologies in achieving strategic goals. 	<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"> - Attempted contacts (90%) - Actual contacts (35%)

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
3.2	Companies should take steps to proactively increase customer awareness of the extra help available to those who need it.	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"> • Engagement Metrics: Track engagement metrics such as website visits, social media interactions, email campaign open rates, and customer inquiries resulting from communication campaigns. • Performance Reviews: Regularly review campaign performance data and adjust strategies based on engagement insights. <p>2. Customer Outreach:</p> <ul style="list-style-type: none"> • Response Rates: Monitor response rates and customer feedback from personalised outreach efforts. • CRM Tracking: Use data & insights to track the effectiveness of personalised communications and adjust messaging based on customer responses. <p>3. Collaboration with Community Partners:</p> <ul style="list-style-type: none"> • Impact Evaluation: Evaluate the impact of partnerships by tracking referrals, engagement levels, and the number of customers reached through community partners. • Partner Feedback: Regularly meet with partners to gather feedback and identify areas for improvement. <p>4. Training and Support for Frontline Staff:</p> <ul style="list-style-type: none"> • Training Effectiveness: Assess training effectiveness through staff feedback, customer satisfaction surveys, and the frequency of support service referrals made by frontline staff. • Program Adjustments: Adjust training programs based on evaluations and identified needs. <p>5. Accessible Information:</p> <ul style="list-style-type: none"> • Review and Testing: Regularly review the accessibility and clarity of information provided on different platforms. • Customer Feedback: Conduct user testing and gather feedback from customers to ensure information is easily navigable and comprehensible. <p>6. Feedback Mechanisms:</p> <ul style="list-style-type: none"> • Data Collection: Collect and analyse customer feedback through surveys, focus groups, and direct feedback channels. • Trend Analysis: Use this data to identify trends and measure the impact of awareness initiatives. • Continuous Improvement: Implement improvements based on feedback to continuously refine communication strategies. 	<p>1. Engagement and Reach:</p> <ul style="list-style-type: none"> • 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. <p>2. Collaboration with Community Partners:</p> <ul style="list-style-type: none"> • Coordination and Alignment: Coordinating efforts with multiple community organisations, charities, and support groups, requiring alignment of goals, schedules, and processes. • Consistency of Message: Ensuring all partners communicate consistent and accurate information about the support services available. <p>3. Training and Support for Frontline Staff:</p> <ul style="list-style-type: none"> • Training Quality: Providing comprehensive and ongoing training for frontline staff to effectively identify and support vulnerable customers. • Staff Turnover: Managing high turnover rates among frontline staff, which can lead to gaps in knowledge and inconsistencies in the delivery of support services. <p>4. Creating Accessible Information:</p> <ul style="list-style-type: none"> • Clarity and Accessibility: Ensuring information about support services is clear, accessible, and understandable to all customers, including those with disabilities or language barriers. • Updating Information: Keeping information up to date across all platforms and ensuring consistency. <p>5. Data Collection and Analysis:</p> <ul style="list-style-type: none"> • Accurate Tracking: Ensuring accurate tracking of engagement metrics, response rates, and customer feedback across various channels. • Data Integration: Integrating data from different sources (e.g.CRM systems, partner feedback, customer surveys) into a cohesive monitoring framework. <p>6. Customer Feedback:</p> <ul style="list-style-type: none"> • Feedback Participation: Encouraging customers, especially vulnerable ones, to provide feedback, leading to potential gaps in understanding customer needs and the effectiveness of initiatives. • Analysing Feedback: Analysing qualitative feedback from various sources to derive actionable insights. 	<p>(1) Stakeholder mapping:</p> <ul style="list-style-type: none"> - increasing number of stakeholders annually (to 2030) - maturity assessment score improvement annually (to 2030) <p>(2) Training assessment of customer facing teams - % trained</p>

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
3.3	Companies should train their staff to spot potential requirements for extra help, even when a customer has not previously declared it.	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 Advice 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 explore the use of sentiment analysis technology to support our teams across customer channels.</p>	<p>1. Training Effectiveness:</p> <ul style="list-style-type: none"> Assessment Scores: Track assessment scores before and after training sessions to measure knowledge retention and comprehension. Completion Rates: Monitor the completion rates of training and refresher sessions to ensure all staff are adequately trained. <p>2. Customer Interaction Metrics:</p> <ul style="list-style-type: none"> Identification Rates: Measure the number of customers identified as needing extra help through staff interactions and track any changes over time. Resolution Times: Track the time taken to address identified needs and provide support to ensure timely assistance. <p>3. Feedback Mechanisms:</p> <ul style="list-style-type: none"> Staff Surveys: Conduct regular surveys with frontline staff to gather feedback on the effectiveness of the training programs and identify areas for improvement. Customer Feedback: Collect feedback from customers who have been identified as vulnerable to evaluate the impact of staff interactions on their experience. <p>4. Escalation Process Efficiency:</p> <ul style="list-style-type: none"> Escalation Tracking: Monitor the number and type of cases escalated to internal departments or external agencies to assess the effectiveness of the escalation process. Follow-Up Outcomes: Track the outcomes of escalated cases to ensure that customers receive the necessary support. <p>5. Continuous Improvement:</p> <ul style="list-style-type: none"> Review Meetings: Hold regular review meetings to discuss insights from staff feedback and customer interactions, making necessary adjustments to training and processes. Policy Updates: Ensure that any changes in policies or available support services are promptly incorporated into training materials and communicated to staff. 	<p>1.Data Accuracy:</p> <ul style="list-style-type: none"> Ensuring that customer data used for identifying vulnerability indicators is accurate and reliable. <p>2. Staff Engagement:</p> <ul style="list-style-type: none"> Encouraging active participation and buy-in from frontline staff in training programs and feedback mechanisms. Addressing potential resistance or scepticism from staff towards new processes or additional responsibilities. <p>3. Customer Privacy and Data Protection:</p> <ul style="list-style-type: none"> Balancing the need for detailed customer information with privacy concerns and GDPR requirements. <p>4. Effective Communication Across Departments:</p> <ul style="list-style-type: none"> Ensuring clear communication and collaboration between frontline staff, internal departments, and external agencies involved in the escalation process. Addressing potential communication gaps that could delay or hinder timely and accurate support for vulnerable customers. <p>5. Measuring Training Effectiveness:</p> <ul style="list-style-type: none"> Establishing meaningful KPIs and metrics to accurately assess the impact of training on staff readiness and customer outcomes. Continuously evaluating and refining training methods based on feedback and performance metrics. <p>6. Adapting to Changing Needs and Regulations:</p> <ul style="list-style-type: none"> Staying agile and responsive to changes in customer needs, regulatory requirements, and industry standards. Updating training materials and processes to reflect new policies or available support services promptly. <p>7. Monitoring and Improving Customer Feedback Mechanisms:</p> <ul style="list-style-type: none"> Encouraging consistent participation in feedback surveys from both staff and vulnerable customers. <p>8. Continuous Improvement Culture:</p> <ul style="list-style-type: none"> Fostering and maintaining a culture of continuous learning and improvement among staff regarding identifying and addressing customer vulnerability. Implementing feedback from review meetings and policy updates effectively to enhance staff readiness and customer support. <p>9. Maintaining Stakeholder Engagement:</p> <ul style="list-style-type: none"> Sustaining productive partnerships with community organisations, local authorities, and social services to enhance outreach efforts. 	<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	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.	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"> Track usage data and customer feedback through analytics tools to assess the effectiveness of the consolidated channels. Measure response times and resolution rates for inquiries and support requests via streamlined channels. <p>2. Evaluation of Personalised Communication Preferences:</p> <ul style="list-style-type: none"> Conduct CSAT surveys to measure effectiveness of personalised communication options. Monitor the uptake of different communication channels and preferences selected by customers over time. <p>3. Compliance and Auditing for Data Privacy and Security:</p> <ul style="list-style-type: none"> Conduct regular audits and compliance checks to ensure adherence to data privacy and security policies. Review internal protocols and external data sharing agreements to verify compliance with regulatory requirements. <p>4. Continuous Monitoring and Evaluation of Strategies:</p> <ul style="list-style-type: none"> Establish KPIs related to communication effectiveness and customer satisfaction with communication practices. Regularly review performance metrics to identify areas for improvement in reducing communication burdens. <p>5. Feedback Mechanisms from Customers and Stakeholders:</p> <ul style="list-style-type: none"> Implement feedback mechanisms such as surveys, focus groups, or complaint handling processes to gather insights from involved parties. Analyse feedback to identify trends, issues, and opportunities for enhancing communication strategies. <p>6. Impact Assessment of Community Engagement:</p> <ul style="list-style-type: none"> Measure the impact of community engagement efforts through feedback from community organisations and local stakeholders. Evaluate changes in awareness and perception of support services and data sharing arrangements within the community. <p>7. Adaptation to Feedback and Continuous Improvement:</p> <ul style="list-style-type: none"> Use insights from monitoring and feedback mechanisms to make continuous improvements to communication channels and practices. Update training programs, communication materials, and policies based on feedback and evaluation outcomes. 	<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	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.	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 unauthorised 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"> • Conduct regular audits to ensure adherence to GDPR and other data protection regulations. • Monitor the effectiveness of security measures such as encryption and access controls. <p>2. Training Effectiveness:</p> <ul style="list-style-type: none"> • Assess staff competency through periodic evaluations and knowledge assessments related to recording customers' extra help needs. <p>3. Customer Feedback and Satisfaction:</p> <ul style="list-style-type: none"> • Gather feedback through surveys and interactions to evaluate customer satisfaction with the process of recording their extra help needs. • Measure customer perceptions of transparency, consent practices, and data security. <p>4. Internal Process Reviews:</p> <ul style="list-style-type: none"> • Regularly review internal procedures to ensure they align with regulatory requirements and industry best practices. • Identify and address any gaps or areas for improvement in data recording and management practices. <p>5. Feedback Utilisation:</p> <ul style="list-style-type: none"> • Analyse feedback from customers and stakeholders to identify trends, issues, and opportunities for improvement. <p>• Use insights from feedback to make necessary adjustments to data recording procedures and customer interaction policies.</p> <p>6. Impact Assessment:</p> <ul style="list-style-type: none"> • Evaluate the impact of data recording practices on the overall customer experience and operational efficiency. • Measure improvements in meeting customers' extra help needs based on implemented strategies. 	<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	Companies' records should be reviewed regularly to ensure they are up to date.	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"> Track completion rates of training programs. Assess staff competency through periodic evaluations and knowledge assessments related to data review and updating processes. <p>2. Record Review Frequency:</p> <ul style="list-style-type: none"> Monitor the frequency of record reviews to ensure they occur as scheduled. Track the number of records updated following each customer interaction and periodic reviews. <p>3. Data Accuracy and Completeness:</p> <ul style="list-style-type: none"> Conduct regular audits to assess the accuracy and completeness of customer records. Measure the percentage of records that are up-to-date and complete. <p>4. Continuous Improvement Insights:</p> <ul style="list-style-type: none"> Analyse insights gained from record reviews to identify trends, issues, and areas for process improvement. Implement a feedback loop for staff to suggest improvements and track the implementation of these suggestions. <p>5. Customer Journey Applications:</p> <ul style="list-style-type: none"> Track the effectiveness of customer journey triggers based on data age in initiating record reviews. Measure the timeliness and accuracy of manual reviews conducted by the customer team for records that fail automated revalidation. <p>6. Customer Feedback:</p> <ul style="list-style-type: none"> Collect feedback from customers on their experiences with record accuracy and support services. Use customer satisfaction surveys to gauge the impact of accurate record-keeping on service quality. 	<p>1. Training Consistency:</p> <ul style="list-style-type: none"> Ensuring all staff receive consistent and comprehensive training on the importance of reviewing and updating customer records. Maintaining high levels of staff competency and understanding over time. <p>2. Data Accuracy and Completeness:</p> <ul style="list-style-type: none"> Ensuring that customer data collected and recorded is accurate, complete, and timely. Addressing discrepancies and gaps in data effectively. <p>3. Customer Engagement:</p> <ul style="list-style-type: none"> Achieving regular customer engagement to validate and update their records. Encouraging customers to provide accurate and timely information during interactions. <p>4. Technology Integration:</p> <ul style="list-style-type: none"> Implementing and maintaining effective technology solutions to trigger customer journey reviews based on data age. Ensuring seamless integration of manual and automated processes for record reviews. <p>5. Continuous Improvement Implementation:</p> <ul style="list-style-type: none"> Utilising insights from record reviews to continuously improve data collection and management processes. Balancing the need for ongoing improvements with operational demands. <p>6. Compliance with Data Protection Regulations:</p> <ul style="list-style-type: none"> Ensuring all processes comply with GDPR and other data protection requirements. Maintaining data security and privacy during the review and updating processes. <p>7. Feedback Utilisation:</p> <ul style="list-style-type: none"> Effectively collecting and analysing feedback from customers and staff to drive improvements. Implementing changes based on feedback in a timely manner. <p>9. Monitoring and Evaluation:</p> <ul style="list-style-type: none"> Continuously monitoring the effectiveness of record review processes. Regularly evaluating and adjusting strategies to ensure records remain up-to-date. 	<p>(1) Data revalidation KPI Measure:</p> <ul style="list-style-type: none"> Attempted contacts (90%) Actual contacts (35%) <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	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.	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"> • Regularly review and update customer profiles to ensure all relevant information is accurately captured and up-to-date. • Track the completeness and comprehensiveness of customer profiles to measure improvements in data quality. <p>2. Data Integration:</p> <ul style="list-style-type: none"> • Monitor the integration process to ensure customer records are successfully linked with other relevant data sources. • Assess the impact of data integration on support efforts and service delivery through performance metrics. <p>3. Consent-Based Data Sharing:</p> <ul style="list-style-type: none"> • Track customer consent rates for data sharing agreements with partner organisations. • Monitor the effectiveness of data sharing arrangements in facilitating coordinated support efforts and reducing communication burdens. <p>4. Cross-Industry Collaboration:</p> <ul style="list-style-type: none"> • Evaluate the outcomes of collaborative initiatives with other water companies to measure the benefits delivered to customers. • Track participation levels and the success of joint efforts in addressing customer needs. <p>5. Regular Data Analysis:</p> <ul style="list-style-type: none"> • Conduct periodic data analysis to identify trends, patterns, and opportunities for improvement. • Measure the effectiveness of data-driven support strategies and their impact on service delivery. <p>6. Continuous Feedback Loop:</p> <ul style="list-style-type: none"> • Collect and analyse customer feedback regarding their experiences with support services and communication processes. • Track changes in customer satisfaction and use feedback to inform continuous improvements. <p>7. Transparency and Accountability:</p> <ul style="list-style-type: none"> • Regularly review compliance with data protection regulations and ethical standards. • Monitor communication practices to ensure customers are informed about how their data is used and shared. • Conduct audits to ensure accountability and transparency in data handling and support efforts. 	<p>1. Data Quality and Completeness:</p> <ul style="list-style-type: none"> • Ensuring all relevant customer information is accurately captured and regularly updated. • Overcoming potential data gaps and inconsistencies. <p>2. Data Integration:</p> <ul style="list-style-type: none"> • Integrating disparate data sources effectively without causing data silos. • Maintaining data integrity during integration processes. <p>3. Customer Consent and Privacy:</p> <ul style="list-style-type: none"> • Obtaining and managing customer consent for data sharing in compliance with privacy regulations. • Ensuring transparency in how customer data is used and shared. <p>4. Cross-Industry Collaboration:</p> <ul style="list-style-type: none"> • Coordinating efforts and aligning objectives with other water companies and partner organisations. • Managing potential conflicts of interest and differing priorities among collaborators. <p>5. Customer Engagement and Feedback:</p> <ul style="list-style-type: none"> • Encouraging customers to provide feedback and engage with support services. • Addressing and incorporating diverse customer needs and preferences. <p>6. Monitoring and Evaluation:</p> <ul style="list-style-type: none"> • Developing effective metrics and KPIs to monitor the success of implementation efforts. • Continuously improving processes based on insights from data analysis and customer feedback. 	<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	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.	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"> Track the clarity and effectiveness of communication through customer feedback surveys. Measure customer understanding of data use and protection via PSR onboarding. <p>2. Customer Choices:</p> <ul style="list-style-type: none"> Monitor the number of customers opting in or out of data sharing. Track customer interactions with preference management channels. <p>3. Training and Awareness:</p> <ul style="list-style-type: none"> Assess staff competency through regular evaluations and knowledge assessments on data protection practices. Monitor participation and completion rates of training sessions. <p>4. Data Security:</p> <ul style="list-style-type: none"> Conduct regular audits to ensure compliance with data protection regulations. Monitor the effectiveness of security measures such as encryption and access controls. <p>5. Collaborative Approach:</p> <ul style="list-style-type: none"> Track data sharing activities and ensure they are conducted with explicit customer consent. Regularly review and assess partners' adherence to data protection standards. 	<p>1. Ensuring Clear Communication:</p> <ul style="list-style-type: none"> Overcoming complexity in explaining data use in a way that is easily understood by all customers. Continuously updating communication materials to reflect any changes in data use or policies. <p>2. Managing Customer Choices:</p> <ul style="list-style-type: none"> Balancing the need for comprehensive data with respecting customer preferences and opt-out choices. Keeping track of customer consent and preference updates in a timely and accurate manner. <p>3. Maintaining Staff Training and Awareness:</p> <ul style="list-style-type: none"> Ensuring all staff consistently participate in and retain information from regular training sessions. Keeping training materials up-to-date with the latest data protection regulations and best practices. <p>4. Data Security:</p> <ul style="list-style-type: none"> Implementing and maintaining robust security measures to protect against unauthorised access and data breaches. Regularly auditing and updating security protocols to stay ahead of potential threats. <p>5. Coordinating with Partners:</p> <ul style="list-style-type: none"> Ensuring partners comply with the same high standards of data protection and confidentiality. Monitoring and managing data sharing agreements to ensure they are always conducted with explicit customer consent. 	<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	Companies should develop and maintain a vulnerability strategy setting out how they plan to support the extra help needs of their customer base.	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"> - Maintaining an industry Leading Identification of Vulnerable Customers - Developing our Tailored Support Service - Maintaining an effective Priority Services Register - Offering financial support and assistance - Developing effective teams along with training and development - Supporting customer awareness and education - Our approach to continuous Improvement and feedback - Using a data-driven approach - Providing emergency support <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"> • Publish an updated vulnerability strategy every two years. • Review and adjust delivery plans based on regulatory, stakeholder, and customer feedback. <p>2. Performance Tracking:</p> <ul style="list-style-type: none"> • 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. • Regularly assess and report on these KPIs to ensure alignment with strategy goals. <p>3. Stakeholder Engagement:</p> <ul style="list-style-type: none"> • Continuously engage with the Board, internal teams, Customer Scrutiny Panel, and local and national stakeholders. • Collect and integrate feedback from these groups to refine and improve the vulnerability strategy and delivery plans. <p>4. Customer Feedback and Insight:</p> <ul style="list-style-type: none"> • Gather and analyse customer feedback to assess the effectiveness of support services and identify areas for improvement. • Use insights from customer interactions to enhance support offerings and communication strategies. <p>5. Training and Development:</p> <ul style="list-style-type: none"> • Monitor the effectiveness of staff training programs related to supporting vulnerable customers. • Ensure regular updates and improvements to training materials and sessions. <p>6. Data-Driven Improvements:</p> <ul style="list-style-type: none"> • Utilise data analytics to identify trends and gaps in service delivery. • Implement data-driven changes to improve the accuracy and effectiveness of support services. <p>7. Continuous Improvement:</p> <ul style="list-style-type: none"> • Regularly review internal processes and procedures to ensure they align with best practices and regulatory requirements. • Implement a feedback loop to continually adapt and improve the vulnerability strategy based on performance data and stakeholder input. 	<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	Companies should take steps to understand the likely underlying requirements for extra help in their areas.	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"> • Ensuring seamless integration of third-party data with existing customer data. • Maintaining data accuracy and up-to-date profiles amidst continuous data inflow. <p>2. Community Engagement:</p> <ul style="list-style-type: none"> • Effectively reaching and engaging diverse community groups. • Gathering and incorporating meaningful feedback from varied stakeholders. <p>3. Collaboration with Local Organisations:</p> <ul style="list-style-type: none"> • Coordinating efforts and data sharing while maintaining data protection and privacy. • Ensuring timely and effective referral processes with multiple partners. <p>4. Continuous Improvement:</p> <ul style="list-style-type: none"> • Regularly adapting strategies based on dynamic customer needs and regulatory changes. • Measuring the impact of changes 	<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>