

Vulnerability Strategy Service for All

June 2025

Affinity **Water**



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Foreword

Our purpose is to provide high quality drinking water for our customers and take care of the environment for our communities, now and in the future. Our aim is to provide efficient and affordable services in both the short and long term.

We understand our role in the community and our obligations to our customers and we understand that customers' expectations of the water industry are rightly increasing.

We have developed this strategy during a cost-of-living crisis where customers are facing cost increases from all quarters, and we understand the effect that increases in bills can have on our customers.

We are proud to present our vulnerability strategy which sets out our plans for developing the support we currently provide and our ambitions for how we will meet the challenges and expectations of our customers by being innovative, efficient and developing partnerships for our customers and communities.

We have set out a wide range of ambitions and initiatives, all of which will help us to understand customer needs and support customers who may need extra help. The range of initiatives are across all areas of our business and are committed to ensuring that supporting customers in vulnerable circumstances is the responsibility of everyone in our organisation, from field teams working on our network to our knowledgeable customer service colleagues.

We welcome the new Ofwat customer focused licence condition and the opportunity to demonstrate how we meet the expectations of the condition.

We have listened to our customers and stakeholder feedback and have developed our strategy under 4 themes:

- Be fair and protect vulnerable customers
- Be proactive
- Help households afford their bill and with the cost-of-living.
- Be transparent

The strategy has been connected in its development with our business plan for the period 2025-2030. It is based on customer priorities and our obligations as a water supply company to deliver on our purpose to provide high quality drinking water for our customers and take care of the environment for our communities now and in the future.

We do this through living, supporting and recognising our company values of 'We do the right thing', 'We are customer focused' and 'We work as one team'.

We know that a lot can change over the years so we commit to review and refresh our strategy annually to ensure that we continue to deliver for those customers who may need extra help.

Rebecca Froud

Director of Customer Experience

Feedback from our Independent Challenge Group

On behalf of the Independent Challenge Group for Affinity Water, I would like to commend very highly this 'Vulnerability Strategy - Service for All'. This strategy has been designed thoughtfully with thorough attention paid to the insights that are available from a wide range of research and data. Additionally, the company has invited feedback on early drafts and ideas from expert ICG members as well as from Ofwat and CCWater. The company now is in the habit of seeking and using independent and external feedback and this way of working is contributing to a culture of continuous improvement where customers are increasingly central to

discussions and decisions. This final strategy represents a significant positive shift for all customers who are most in need of help from their water company. The comprehensive nature of the support offers detailed for those in financially vulnerable circumstances is impressive. We are very pleased to see that the commitment to eliminating water poverty in line with CCWater's ambitious target, is being taken so seriously. There has been an equivalently steep improvement in the company's approach to supporting customers in non-financially vulnerable circumstances.

The precise segmentation of the Priority Service Register is especially notable and demonstrates a determination to acknowledge the wide range of different circumstances that customers who are vulnerable may experience. This carefully tailored programme has the demonstrable potential to make a meaningful difference where most needed and in ways that are most appropriate for each household. We look forward to further discussions with the company ongoing as this strategy is delivered.

Caroline Warner

Chair, Affinity Water Independent Challenge Group

Feedback from our expert vulnerability partner – Helen Pettifer Training Ltd

I'm impressed with Affinity Water's commitment to provide high quality affordable drinking water to their customers whilst taking care of the environment and their communities.

Their organisational culture demonstrates a curiosity to understand their customer challenges and support needs. Through extensive research and data analysis they are committed to provide adaptive and flexible support needs for their customers, particularly customers who are finding it difficult to pay their bills and those whose lives could be at risk if water supply was unable to be accessed or was interrupted.

They have helped customers become aware of and access the Priority Services Register and reduce their bill tariffs by providing leaflets to the Small Acts of Kindness charity for distribution. Their case studies are testament to the continued work they are doing in all other aspects of support.

Affinity have been accredited with the BS ISO 22458 which is awarded for showcasing their inclusive service practices, demonstrating company-wide commitment, resources and approach in supporting consumer vulnerability.

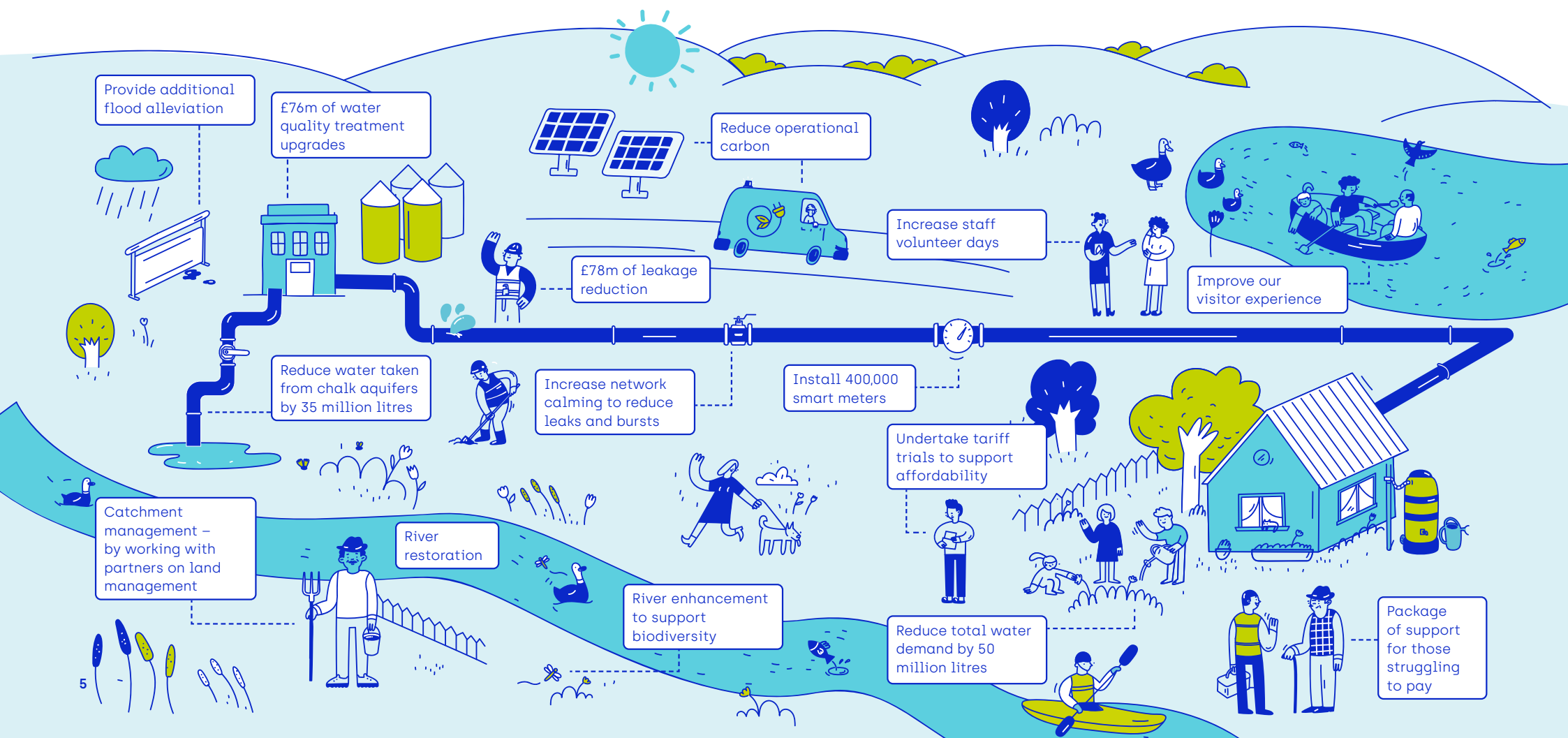
I've been inspired by their community work which has seen them supporting local foodbanks and understanding the regional issues their customers are facing, especially with the ongoing cost-of-living situation.

What they have planned for the next 5 years is ambitiously empowering and focuses on some of the key situations customers will be experiencing. Their strategy draws on the importance of understanding and addressing customer's needs whilst also working to provide the same level of care and support for their colleagues who are supporting customers.

Their Vulnerability Strategy - Service For All clearly documents their commitment and ethos to supporting their customers and what customers can expect from Affinity.

About us and our plan 2025 – 2030

We're a 'Water Only' company. That means we supply clean water to our customers, but we do not manage or process wastewater or sewage. In fact, we're the largest water-only company in the United Kingdom, owning and managing the water assets and network in an area of approximately 4,500km². We've been supplying water to the community in our three supply regions in the South East of England for more than 170 years.

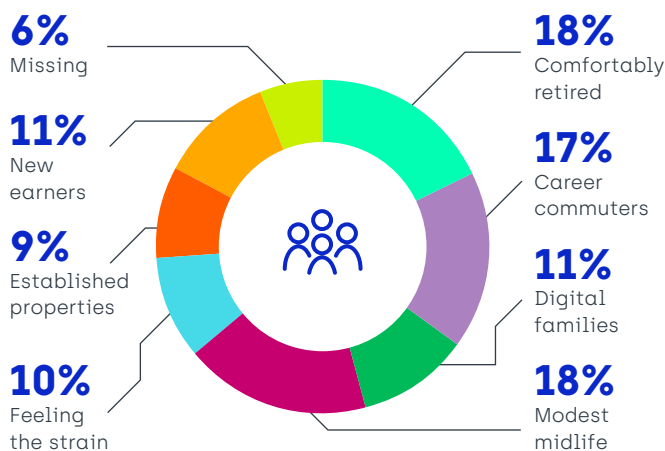


Meet our Customers and Stakeholders

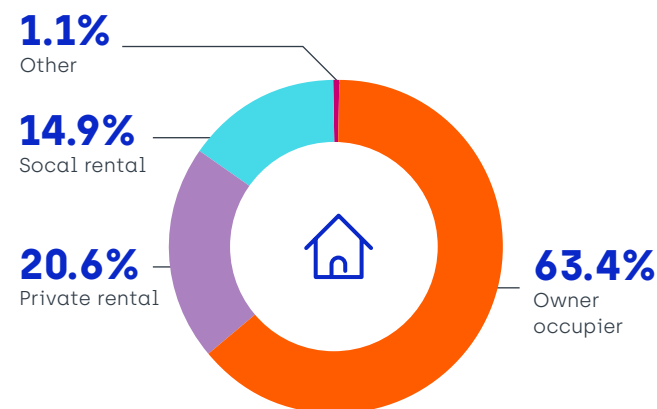
In order to understand what our customers and communities think, we need to know who they are. As well as regularly refreshing our overall demographics (using data from the Office for National Statistics (ONS) NOMIS website), we have looked at our customer segments.

We have developed eight customer segments (personas), which we also use to analyse data from research and insight activities. This allows us to explore what our customers think more broadly and establish how we can best serve them in the future.

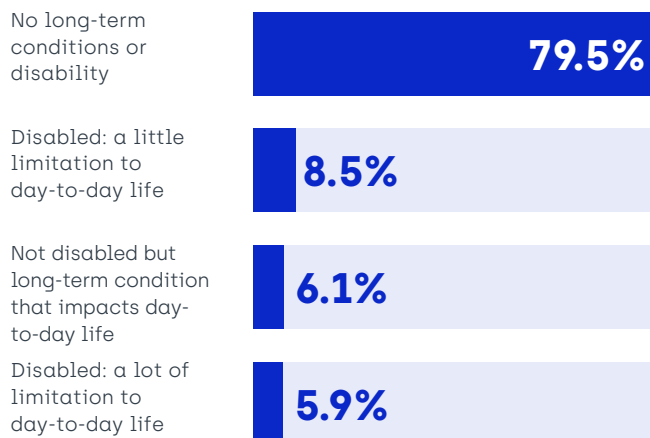
Demographic segmentation



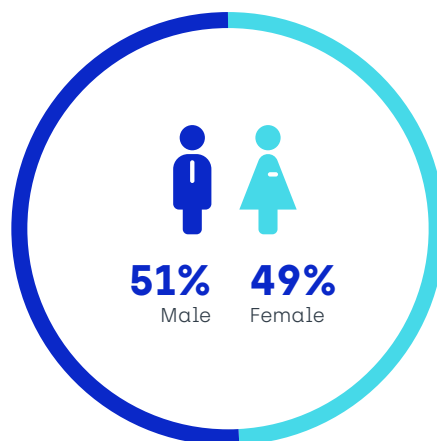
Ownership Status



Disability breakdown



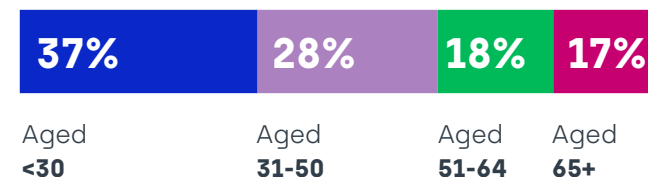
Gender breakdown



Property meter status breakdown



Property ownership breakdown by age



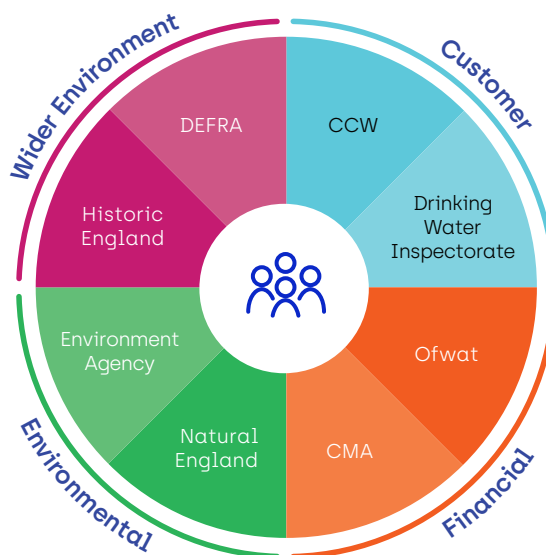
We engage with a range of stakeholders across our supply area, both at a national and regional level to keep them updated on our operations and strategic priorities. We work closely with our regulators – Ofwat (economic regulator), the Environment Agency (environmental regulator), the Drinking Water Inspectorate (water quality regulator) and CCW (Consumer Council for Water), who represent customers. We also engage with non-departmental public bodies such as Natural England and Historic England, alongside several non-governmental organisations (NGOs), such as charities, community groups and environmental organisations. Our supply area includes both rural and dense urban communities, which have diverse needs. We regularly engage with MPs, Councillors and Local Authorities to share information on improvements or changes that may impact the communities they serve.

Feedback from our customers and stakeholders has played a key role in developing our vulnerability strategy. Our aim is to always deliver improvements for our customers and insight is a key part of our understanding of what our customers and stakeholders expect.

Wider range of stakeholders (June 2024)



Key Regulators (June 2024)



49

Local Authorities



55

MPs

June 2025

Customer demographics

We serve 3.9m customers across 1.5m households. This has been rising at just under 1% every year since 2017, an average of 14,200 properties, a trend that could potentially see another 100,000 households added by 2030. As at the end of May 2025 over 70% of our customers were billed on measured charges.

We don't collect customer demographics directly from customers, instead we use census data, as well as from our brand tracker.



3.9m
customers



1.5m
households

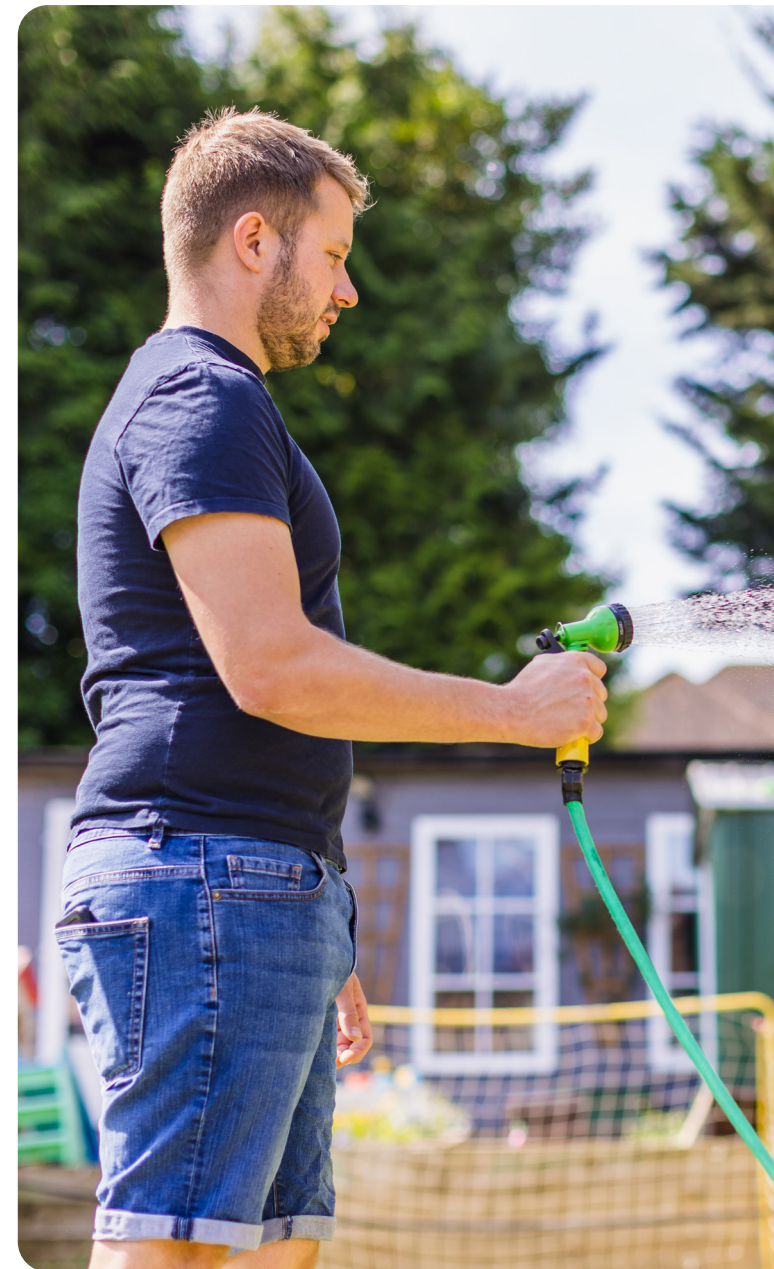
The Affinity Water area is highly variable with groups often highly concentrated in particular communities rather than truly mixed.

The Affinity Water area covers areas from the very urban to the very rural, and of extreme deprivation to significant affluence. Whilst on average, our supply area is more affluent than the national average, it also includes both the single most deprived area in England [Jaywick, near Clacton-on-Sea] and the 10th least deprived [Chorleywood]. Parts of our area are rural and sparsely populated; however, we also supply densely populated neighbourhoods in Outer London.

The coastal areas of our Brett & Dour communities have a generally more vulnerable profile than our central area north and west of London. In these coastal communities our customers are older. [27.0% over-65 in Brett, 22% in Dour, vs 16.4% in Central] and more likely to have a disability or life-limiting condition [30.4% in Brett, 28.5% in Dour, 19.9% in Central].

Ethnicity is another demographic that is highly variable across our area. In our central area which includes parts of London, about 56% of the population identify as white British. Outside the M25, the proportion of the population from ethnic minority groups falls sharply. About 90% of our customers in our Brett and Dour communities identify as white British.

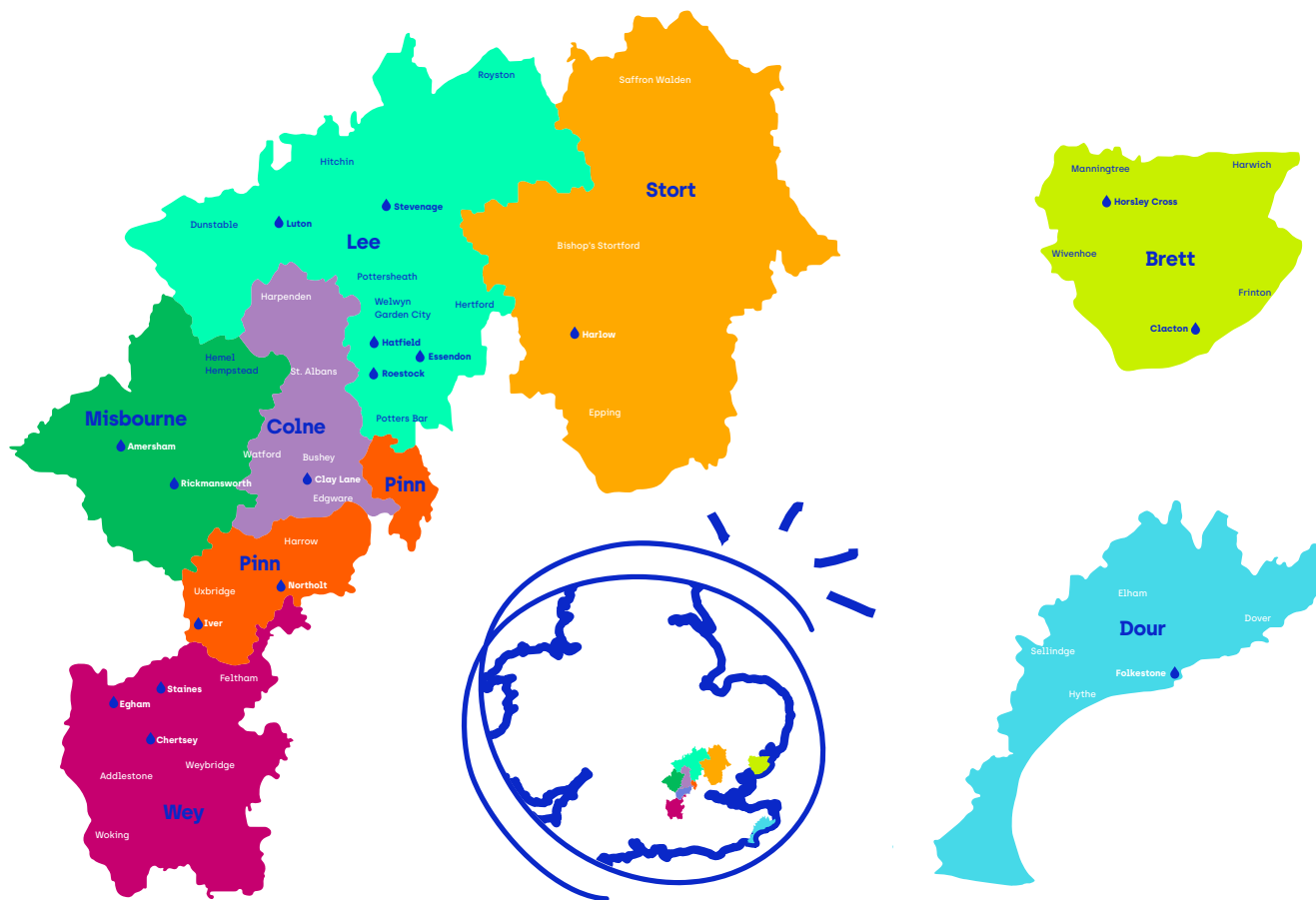
We know that to effectively provide support for our customers who may be most affected by a supply interruption we need to understand the wide-ranging scope of customer vulnerability so that we can support households in the most appropriate way. Understanding the demographics relating to disability helps us to tailor our actions. On the Census there are options for those who are registered disabled as per the Equalities act and for non-qualifying long-term conditions. Overall, 82.3% of people in England have no disability, for Affinity, the rate is 85.6% overall, and there are distinct variations. Not unexpectedly, there are hotspots of disability within retirement communities along the coast.



Index of Multiple Deprivation

The Index of Multiple Deprivation (IMD) datasets are measures of relative deprivation across small areas (Local Super Output Areas – LSOAs) and can be used to rank areas from most to least deprived. IMD measures of deprivation include themes such as income, employment, education, health, crime, access to housing and other services alongside quality of the living environment. There are some limitations to IMD data as it was last published in 2019 and the boundaries of the LSOA are not always perfectly aligned with our company boundaries however it does allow us to understand local differences in deprivation across our area.

- Overall, our area comprises 2,373 LSOAs and is less deprived than the country as a whole
- However, our area is diverse. Of the 35,000 areas analysed by the IMD, our supply area includes **both the most deprived area** – Jaywick near Clacton-on-Sea, Essex, and the 10th least deprived, Chorleywood, Hertfordshire.
- Understanding the extremes in our area is important so we can target our assistance and tailor our communications accordingly.
- In our area 156 LSOAs are ranked in the bottom 2 deciles.
- Our most deprived areas are scattered throughout our area, with concentrations in our coastal communities, outer London and small centres elsewhere, such as Luton.
- LSOAs comprise between 400 and 1,200 households and have a usually resident population between 1,000 and 3,000 persons.



Area	Total LSOAs	% of total	Bottom Quintile LSOAs	% of bottom quintile
East	100	4.2%	27	17.3%
South East	111	4.7%	26	16.7%
Central	2162	91.1%	103	66.0%

Our research and engagement with customers and stakeholders

Our research programme

We have ensured that customer research and insight is delivered through a dedicated department within our business.

This has enabled us to build a centre of excellence which not only collects and commissions insight, but also analyses and synthesises that insight and clearly communicates findings across the business.

Fundamentally, we have aligned our approach with the high-quality research principles set out by Ofwat.

Useful and contextulised

We have designed our engagement and research to ensure we are giving customers context – whether that is explaining current performance, providing useful info graphics and sharing a variety of materials to help customers cognitively engage.



Independently assured

We have used Sia Partners to independently assure our engagement.



Fit for purpose

We have used varied techniques and approaches – ensuring they are fit for the question in hand. From gathering day-to-day insight, wider literature review, online community, qualitative, quantitative and consultation.



Continual

We have gathered a wide range of insight to utilise in our triangulation – this includes using analysis from our 'Voice of the Customer' tool which continually monitors customer insight and sentiment.



Ethical

All our research has been designed to ensure the best ethical practices including ensuring anonymity, voluntary participation and informed consent.



Neutrally designed

We have worked with leading market research experts as well as having an expert in-house team to design research and engagement – testing our approach and materials with our ICG.



Inclusive

We have developed a sampling strategy to represent the customers we serve, both from a demographic and geographic perspective. We also have included business customers in most of our research. We have convened specific groups to explore views of youth, vulnerable and retailers.



Shared in full

We have led collaborative research across several companies, worked across the South East companies to regularly share insight findings and approaches. We have a dedicated site where we share all our engagement findings.

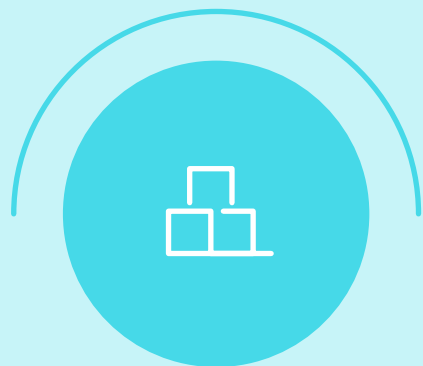


We have engaged over 13,000 customers directly via a variety of ways, with further insight gathered from around 110,000 customers helping to inform and triangulate our findings. Alongside this we have understood wider priorities and valuations work and conducted deep dives targeted toward harder to reach groups to ensure diverse consultation, which provides the breadth across all parts of our customer base and communities we serve.

We have shared our approach, materials and progress across the business and with our Independent Challenge Group (ICG) who provide scrutiny and challenge on behalf of customers.

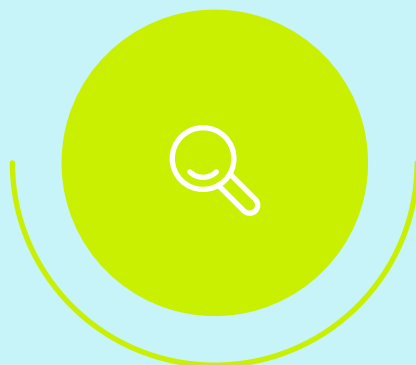
In total we conducted 33 different types of research which were dedicated to vulnerable and customer and stakeholders as listed in Appendix B

13,000 
customers directly engaged with



Laying the foundations

- Strategic Direction Statements (SDS) engagement
- Water resources regional research, Water Resources South East (WRSE)
- Online community
- Priorities and willingness to pay
- National Outcome Delivery Incentives (ODI) rates research



Deep dives

- Regional water resources - best value
- Strategic Resource Options (SROs) - added value
- Strategic Resource Options (SROs) - changing water source
- Water quality
- Wider environmental benefit
- Resilience
- Lead
- Stakeholder deep dives



Sharing our thinking

- Water resources regional emerging plan consultation
- Your water/your say
- Youth panel/vulnerability panel



Test, iterate, refine

- Customer testing of Water Resources South East (WRSE) regional water resources plan
- Water Resources South East/East (WRSE/WRE) regional plan consultations
- Water Resources Management Plan (WRMP) consultation
- National (Price Review 2024) PR24 acceptability/affordability testing
- PR24 consultation

Synthesis and triangulation

We have not just used multiple sources of our own insight and research to inform our plans, we have drawn on regionally and nationally commissioned research conducted on behalf of the water companies and the industry, in addition to third-party work of relevance to a specific area, such as cost of living. By using a range of data sources, we aim to minimise confirmation bias and maximise the validity of the decision-making. We have used an approach of synthesis and triangulation aligning with CCW guidance published 24 May 2017. Our approach brought together research conclusions in one place, interpreting them in an independent way, and assessing and weighting to form overarching conclusions which could then be sense checked with our customers and ICG. We have assured our triangulation approach through a third party, Sia Partners.

We recognise that triangulation should be informed by a transparent and consistent weighting framework. We have worked closely with industry experts in this area and developed the framework as shown.. Each piece of insight was logged on our SharePoint database, updated on an ongoing basis, and scored by the Insight team based on the method set out as shown. We share this database across the business to allow all those interested (including our ICG) to see individual insight reports. We have provided public access to our research on our dedicated engagement site as part of our commitment to support Ofwat's Open Data initiative.

Score	Insight source scoring			Feedback scoring
	Methodologically sound	Rigorously gathered	Credibly interpreted	Contributory score
1	Limited or no methodology, unplanned with no aims or objective	Limited discussion of data collection technique, who collected data or the procedure for recording differing opinions	Lack of credible interpretation with potential bias. Limited or no discussion of feedback points in the conclusion	Vague, high-level feedback with only a tangential relevance to the topic in question
2	Some aims of engagement, but limited discussion of sampling, knowledge levels and backgrounds	Some discussion of data collection and the methods. Limited depth of feedback and range of options	Some link and discussion of the engagement details in the event report, including some differing views	Feedback not necessarily fully aligned to the topic and only provides a limited insight and thus moderately useful
3	Clear aims, sound sampling methodology and considerations to barriers to inclusion	Thorough discussion of data collection procedures, noted at range of perspectives and extensive detail on feedback	Engagement work interpreted accurately and fairly with detailed outline of all perspectives and issues discussed	Specific, clear and relevant information with clear link to the topic discussed - high value added





Our business-as-usual research i.e. research done on a regular interval includes:



Voice of the Customer feedback programme (surveying customers who contact us for any reason)



Perceptions Survey – quarterly survey amongst all customers, not just those who contact us



Vulnerability survey – an annual survey of vulnerable customers.

The vulnerability survey engages with vulnerable customers through a web survey that is recruited via texts, emails and by post (postal surveys can be filled by hand or completed via a push-to-web QR code). It speaks directly to those who haven't contacted us and asks them to rate several components of customer service. This supplements responses to the voice of the customer programme from customers flagged as on PSR or a social tariff.

The Perceptions survey recruits at random, so can't be linked to individual accounts. In this, analysis is done by using proxy questions to establish receipt of benefits, and self-reported levels of disability/life limiting conditions.

Up until March 2024, there was also a customer panel of ~500 customers at any given time.

Bespoke strategic research at Affinity is designed to be inclusive from the request for proposal stage. Often, our research requires a representative sample – issues of vulnerability are not the focus of the research so, there is no need for more representation than matching what exists. However, it is well known that engagement amongst vulnerable groups is harder to generate and requires more consideration than non-vulnerable groups.

Consequently, all our research specifies exactly how we ensure vulnerable customers are included and how barriers to engagement that these customers can face will be overcome.

For example, quantitative surveys will have appropriate quotas of vulnerable customers to achieve, and weightings are applied as well. Further examples include our PR24 'Deep Dives' qualitative work to look at the appeal of key areas under consideration for improvement in the 2025-2030 Business Plan. This series of reconvened focus group included a group entirely made of 'Vulnerable customers', due to a mix of health and financial needs, or both.

We also recognised that the 'Your Water, Your Say' general public consultation required as part of our Business Plan may not encourage vulnerable audiences to take part. We therefore supplemented the 'Your Water, Your Say' sessions with a series of discussion groups with vulnerable customers of all kinds to understand their specific feedback on our business plan.

What our research has told us

Difficulty paying bills is widespread and increasing



In 2019, 3 million households (approximately 11%) across the UK struggled to pay water bills. Before Covid-19, it was estimated that 12% (roughly 1 in 8) customers were in water poverty (where the water bill is more than 3% of household income - there is a tighter measure where that level is raised to 5%).

At the more stringent 5% level, approximately 5% of the customer base are in poverty, and just over 5% receive a social tariff; this suggests that Affinity is supporting those in water poverty. There is some evidence that this is keeping bills affordable, as the average affordability scores for Affinity customers has only declined slightly. By October 2022, 20% claimed they were struggling to pay water bills, and the proportion claiming to struggle with any bill rose from 12% in December 2021 to 25%.

Lack of awareness and personal pride are stopping people getting help



Ofwat's December 2022 survey showed that only 28% of English & Wales billpayers were aware of support for those struggling to pay bills, down 5 percentage points from December 2021.

A 2020 survey of Affinity customers showed that 42% of all customers were aware of the social tariff, whilst Affinity Water's perception survey found that more than 7 in 10 of those who said their bills were not affordable were unaware of Affinity Water's assistance programmes.

In 2018, Ipsos conducted two surveys, face-to-face and online, asking if people had problems paying their bills. The level of admission of problems was much higher in the more anonymous online survey.

An additional barrier to getting help may be personal pride or a sense of shame that leads them to not want to admit the issues to others, or a belief that they won't get help.



Affordability & Acceptability Testing



Quantitative survey including ~330 vulnerable customers (mix of PSR and financial needs) testing elements of our business plan, such as the level of bill for the 2025-2030 period and improvements in services.

Vulnerable customers were significantly more likely to find our plans acceptable, but also more difficult to afford.

Low Income Fixed Tariff [social tariff] expansion testing.



Discrete Choice [trade-offs] survey amongst a randomly sampled demographically representative sample, including 15% who stated they were registered with PSR, and 25% with income below £18k.

Participants showed a preference for extending LIFT to include customers receiving PIP/DLA with a combination of both balloon payments (such as the additional £50 credit given to LIFT customers this year) and a fixed reduced tariff.

Customer Priority Depths



Exploratory groups looking at aspects under consideration for the business plan (environmental improvements, faster action on net-zero, plans for increased system resilience. Vulnerable customers (a mix of both types) were engaged in a single focus group to ensure we directly understood their priorities.

When looking at non-financial needs and aspirations, these customers did not express any significantly different views and opinions from other groups, having the same priorities and expectations of Affinity as their non-vulnerable counterparts.

Perceptions Tracker



Very few significant differences to non-vulnerable customers, notably relating to Price, Value for Money and Affordability Satisfaction

Interestingly, vulnerable customers are more aware of our advertising and campaigns.

Our actions

Using the insight and understanding we have gained from our customer research and engagement programme with vulnerable customers, we have identified the following actions in our strategy to support their specific needs. We will:

- ✓ Work with expert partners to design and test processes inclusively.
- ✓ Support public and community events focused on customers who may have extra needs.
- ✓ Train our colleagues to be able to identify and respond to triggers that may indicate vulnerability including signposting additional services.
- ✓ Be innovative and transparent with our affordability support available for customers.
- ✓ Work with partners to minimise effort for our customers to receive support.
- ✓ Use data to proactively identify customers who may have extra needs.
- ✓ Obtain more feedback from customers who may have extra needs after service incidents.

The support we currently provide

We are committed to providing targeted support for those who are struggling to pay their water bills. We have a large number of schemes and projects, and work with trusted partners, to enable us to offer a wide range of support, whether on a temporary or longer-term basis.

The CCW (Consumer Council for Water) affordability review recommendations published in May 2021 placed us a joint third best company with regard to the proportion of customers in water poverty being helped. The figure below summarises the measures we currently have in place to help our household customers.



Customer affordability and acceptability

Supporting our customers in vulnerable circumstances

- Multiple channels to register for PSR including ability for third parties to register.
- Language Line, British Sign Language interpreter service
- VIP lines for PSR customers
- Collaborative working with distribution network operators on campaigns to raise awareness of PSR and financial support
- Pilot on behalf of CCW to promote financial support to customers who have signed up to PSR



Supporting our customers in financial vulnerability

- Working with wastewater providers to ensure customers can be placed onto wastewater tariff without additional application
- Water assistance voucher scheme – working with charity partners
- Signposting additional support including income maximisation
- Debt support schemes including 'economic abuse', 'crisis' fund
- Breathing space – debt respite scheme.
- Payment breaks, payment plans
- Water direct – option to pay water and sewerage charges through benefits
- Social tariffs including Low-Income fixed tariff, Watersure and applying wastewater social tariffs



Support in the community

- Community grant to support local projects (Liberty Tea Rooms – CAP Debt Advice Centre)
- Community events – including attendance at 'wellbeing hub' to provide face to face advice
- Supporting local authority with distribution of 'Household Support Funds'
- Partnership with local DWP office to run 'surgery' for clients to discuss water bills
- Partnership with National Debtline including co- branded website page
- Working with local charity to distribute flyers promoting PSR and financial support



Making it easy

- 18 months contact cycle for data quality and to check receiving the correct service
- Home Water Efficiency visits - information and advice on water efficiency including providing and installing free devices
- Provision of alternative water during supply interruptions
- Data sharing agreements with housing associations for easy identification of households in vulnerable circumstances
- Single application form for support schemes
- 'Priority Customers' training for frontline colleagues
- DWP – data sharing agreement to proactively identify households eligible for reduced bill tariffs
- 'Personas' published on our website to highlight how we have helped customers
- ISO 22458 – Consumer Vulnerability
- Proactive email promoting financial support sent to 650K households



Over the course of 2022, the cost-of-living crisis emerged and quickly deepened as the impacts of both the pandemic and the war in Ukraine started to be felt. We took action to directly help those customers likely to be the worst affected and put the following measures in place, effective from April 2023.

Provided a £50 one-off bill credit to 30,000 customers, targeted at those requiring extra support, such as those who are disproportionately affected by the cost-of-living crisis. We are also working with trusted partners who identify eligible households, for example those who qualify for a fuel poverty voucher due to their circumstances. This will offset about 25% of the water bill and, for an average water and waste bill, this will reduce their monthly payment by approximately £6 per month.

Price-freeze for the standing charge, benefiting those with lower usage and allowing customers more control over their bills through managing consumption.

Uptake of social tariff – increased our level of discount for the water element of the bill to 60% for households in the most need, typically single adult families or households. By March 2026 we anticipate that around 134,000 households or 9.17% of households will benefit from a discount equivalent to approximately 40% or 60% of an average bill.

Our combined support from social tariffs and water assistance payments means that all customers struggling to pay or in water poverty could benefit from support in paying their bills.



What does the strategy mean for you?

We have set out our headline commitments and ambitions to support our customers who may need additional support grouped under the following themes which you have told us are important to you:



Theme 1
**Be fair and protect
vulnerable customers**



Theme 2
Be proactive

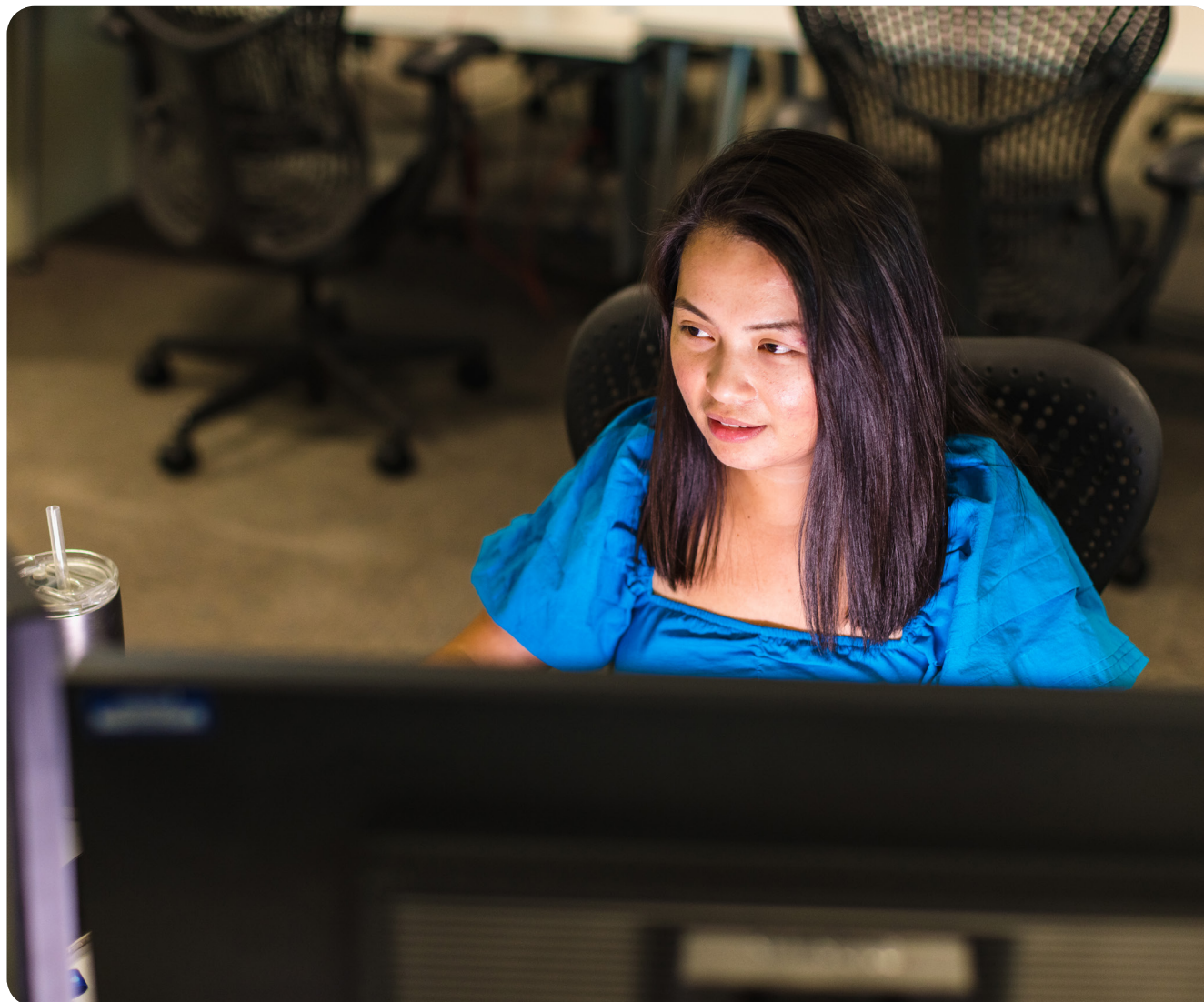


Theme 3
**Help households
afford their bill and
with the cost of living**



Theme 4
Be transparent

We have also provided a table on our ambitions in full, together with timescales and the relevant principle from the customer focused licence condition.



Be fair and protect vulnerable customers



This is a medium-term ambition meaning we aim to have this in place in 1-2 years.

What we do now

- Support for households during a supply interruption including the delivery of bottled water
- Communications and bills in a variety of formats such as large print, braille, audio and on different coloured paper.
- Interpreter service available for different languages and British Sign Language.
- Register a nominated third party for bill management or for contact during a supply interruption
- Work with partners to reduce the burden on customers finding and applying for support
- Provide multiple options for customers to register for priority services, customers can contact us on a dedicated VIP lines during an incident
- For more details of the help we provide please see pages 24 – 30.

What we plan to do

- Increasing our understanding of vulnerability through partnership work.
- Undertake annual vulnerability workshops with colleagues and vulnerability champions to continually improve our understanding and service for those customers
- Provide a telephone check-in and support service during large scale incidents for our most vulnerable PSR customers
- Survey this specific group to help us understand needs and how we can adapt
- Annually refresh training with colleagues who have direct contact with customers to continually improve our service

How do we intend to do this

- Develop partnerships and establish a customer panel with vulnerability representation and insight from experts where appropriate.
- Appoint vulnerability champions in each local team and across our business to act as a point of contact for their colleagues and to provide a local voice.
- Appoint Senior Leaders and Directors across our business to act as a vulnerability champions
- Our dedicated operational teams will attempt to call customers during emergencies and to also check in following incidents.



Be proactive



This is a combination of short and medium-term ambition meaning we aim to have this in place in 1-2 years.



What we do now

- Collaborative working with distribution network operators on campaigns to raise awareness of PSR and financial support.
- Community events including regular attendance at local foodbanks
- Work with local charities to distribute flyers promoting PSR and financial support including colleagues using 'Affinity days' to volunteer and support these projects.

What we plan to do

- Deliver a programme of customer communications using multiple channels and formats focused in areas where we know there is a high requirement for but low awareness of support.
- Expand data sharing arrangements with other trusted organisations, such as local authorities, health agencies and charities to ease the burden on customers having to find and apply for support.
- Keep our data up to date by contacting customers every 2 years to confirm that we are aware of any additional needs in the household

How do we intend to do this

- We will use data to identify households that may be eligible for additional support such as reduced bill tariffs and Priority Services Register including publicly available data such as Index of Multiple Deprivation and ONS.
- We will measure our success through the number of people we help with reduced bill tariffs, increases in the number of PSR registrations and the overall reduction of people in water poverty
- We will be innovative in how we reach customers, such as providing case studies of customer personas, customer testimonies, colleague videos and trusted partner testimonies.
- We will work regionally with partners that can support us to reach communities to help reduce customer effort in obtaining support.
- We will be innovative in how we reach and raise awareness with our customers, such as providing case studies of customer personas, customer testimonies, colleague videos and trusted partner testimonies. Our communications will be easy to understand with clear explanations of the support we can provide.
- We will monitor levels of awareness through customer surveys, feedback and by monitoring our PSR data to ensure we are closing the gaps in areas where we have identified high need but low awareness of support.

Help households with the cost of living



This is a medium-term ambition meaning we aim to have this in place in 1-2 years.

What we do now

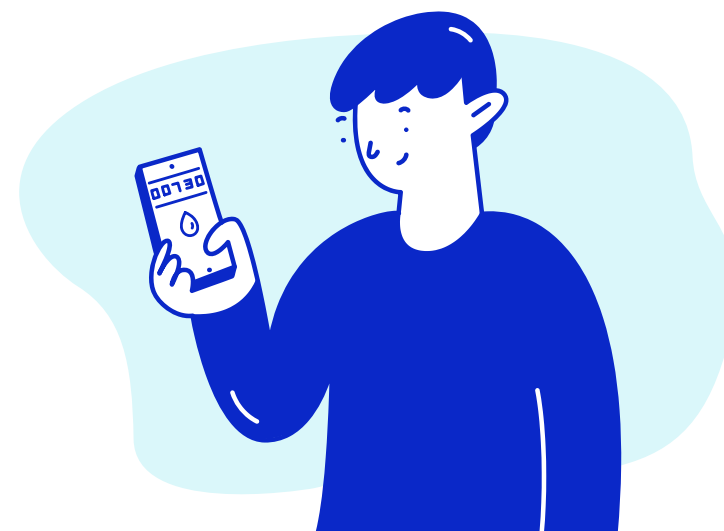
- Reduced bill tariffs including Low Income Fixed tariff, Watersure and applying wastewater tariffs.
- Debt support schemes including supporting victim-survivors of economic abuse.
- Provide financial donations to debt advice charities to support their work and fund local projects in our community.
- Water assistance voucher schemes through referral partners to support households struggling financially.
- Home water efficiency visits to provide tailored advice on water saving

What we plan to do

- Improve our signposting tools to support customers to obtain help for a wide range of issues as well as financial support.
- Develop our home water efficiency visits to include affordability support, energy efficiency advice and back up plans for customers who medically depend on water.
- Provide an income-maximisation service to help customers manage their household bills
- Provide free leak repairs for the most vulnerable customers whose bills are being negatively impacted.

How do we intend to do this

- We will expand our partnerships to include 'warm' referrals to debt advice agencies and to other organisations.
- We will plan to reach customers who medically depend on water to provide them with a home water efficiency visit
- Where customers are also financially vulnerable, we will provide a free leak repair where bills are being negatively impacted.
- We will work with partners to identify and implement an effective way of supporting customers with an income maximisation service using a tool available to both customers and colleagues.



Be transparent



This is a medium-term ambition meaning we aim to have this in place in 1-2 years.

What we do now

- Annual certification of external accreditation ISO 22458 regarding consumer vulnerability. We have achieved the standard held since 2019.
- The standard provides requirements and gives guidance on how to provide an inclusive service at all stages of service delivery and helps us to identify and support customers who may require extra help.
- Feedback from customers in financial and non-financial circumstances is tracked and is used in the ongoing improvement of our customer journeys.

What we plan to do

- Expand the independent scrutiny of how we meet the needs of customers in vulnerable circumstances
- Use key guidance such as – 'Inclusive design in essential services' to include end-user testing for development of products and services and to learn from lived experience.
- After prolonged incidents, survey customers specifically on the PSR so customers will have the opportunity to feedback on the support received during an incident and help us improve.

How do we intend to do this

- Identify and achieve additional external accreditations that enhance how we support customers with additional needs.
- Undertake outputs from annual vulnerability workshops with colleagues and stakeholders.
- Increased independent scrutiny from our vulnerability advisory panel.



Priority Services Register – Our promises to you

Our priority services support thousands of customers with any extra help that they might need either on a short term (transient) basis or longer term. Extra help may be needed with communication, understanding bills or during a supply interruption.

When applying for priority services as an Affinity Water customer, you'll be asked to select the service or need that applies to you so that we can provide you with the support you need.

We can also take registrations from third parties, such as relatives, carers, charities, or other utilities on your behalf if it's in your interest to do so.

We list below the extra help you can expect from us.

Tier 3



Hearing impairments (hearing difficulties or deafness)

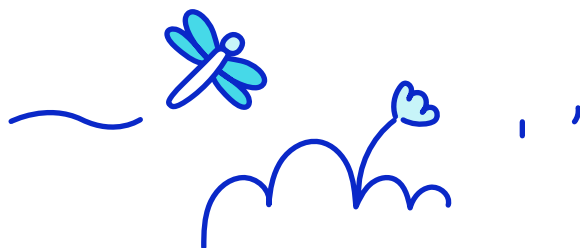
- Send text message service for unplanned supply interruptions so that you have accurate information about the incident and can plan accordingly.
- For planned interruptions we will provide you with prior notice.
- If you need more time to get to the door when we visit let us know and we will knock and wait.
- We can speak with your nominated contact on your behalf.
- You can communicate with us in British Sign Language
- We will ensure that our customer videos are subtitled.
- We offer different channels for you to choose how you want to contact us for example email, webchat, WhatsApp, Relay UK.

Tier 2



Dementia/Cognitive impairment

- If you need more time to get to the door when we visit let us know and we will knock and wait.
- Send text message service for unplanned supply interruptions so that you have accurate information about the incident and can plan accordingly.
- For planned interruptions we will provide you with prior notice.
- We can speak with your nominated contact on your behalf and where possible we can arrange for them to be present during any visits.
- We can send copies of bills to your nominated contact.
- Customer facing staff will be trained to be Dementia Friends.
- Deliver bottled water during a prolonged supply interruption [12 hours+].



Tier 3



Mental Health

- Send text message service for unplanned supply interruptions so that you have accurate information about the incident and can plan accordingly.
- For planned interruptions we will provide you with prior notice.
- We can speak with your nominated contact on your behalf.
- Treat any disclosures of mental health problems in an appropriate non-judgmental manner.
- Offer a range of communication channels so you can communicate with us in a way that suits you.
- Maintain a network of mental health first aiders in the organisation to support colleagues, including following difficult phone calls as well as friends and family.
- Signpost to any additional services that may be suitable

Tier 1



Health Impairments (Water dependent/dialysis and other water dependent conditions)

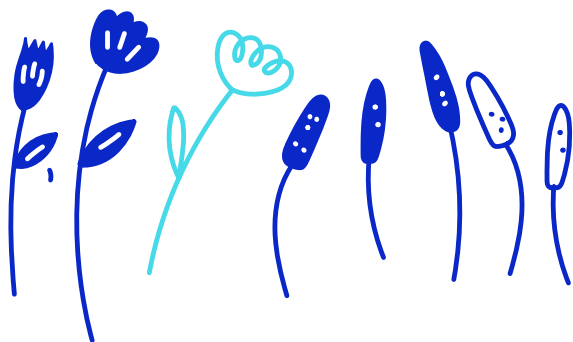
- If you need more time to get to the door when we visit let us know and we will knock and wait.
- You will be treated as priority during an event so we will aim to call you to understand the personal impact and support needed. We will also aim to contact you after the event to ensure that you are happy with the quality of your water to commence any home dialysis again.
- We will provide you with bottled water during prolonged supply interruptions or emergencies (6 hours+).
- Send text message service for unplanned supply interruptions so that you have accurate information about the incident and can plan accordingly.
- For planned interruptions we will provide you with prior notice.
- Signpost to any alternative tariffs that may be suitable.

Tier 2/3



Sight Impairments (Blind or partially sighted).

- We will provide bills in a format of your choice including braille, large print, audio CD and alternative coloured paper.
- We will provide any emergency notices such as boil notices in either braille or large print and contact you or your nominated contact during water quality incidents.
- If you need more time to get to the door when we visit let us know and we will knock and wait.
- Our colleagues will carry identification that shows their name, photograph, logo, and telephone number to contact to verify their identity.
- Our colleague identification cards also have information in braille.
- Send text message service for unplanned supply interruptions so that you have accurate information about the incident and can plan accordingly.
- For planned interruptions we will provide you with prior notice.
- Our StreetWorks will consider the needs of those with reduced mobility, including visually impaired people.
- For customers who have advised us that they are blind we will deliver bottled water during a prolonged supply interruption (12 hours+).



Tier 2



Age related Impairments

- If you need more time to get to the door when we visit let us know and we will knock and wait.
- Send text message service for unplanned supply interruptions so that you have accurate information about the incident and can plan accordingly.
- For planned interruptions we will provide you with prior notice.
- Our colleagues will carry identification that shows their name, photograph, logo, and telephone number to contact to verify their identity.
- Deliver bottled water during a prolonged supply interruption (12 hours+).
- We can speak with your nominated contact on your behalf including notifying them of a supply interruption that is affecting you.
- Signpost to any alternative tariffs or additional services that may be suitable.
- Offer a range of communication channels so you can communicate with us in a way that suits you.

Tier 1



Chronic/Serious illness

- If you need more time to get to the door when we visit let us know and we will knock and wait.
- Send text message service for unplanned supply interruptions so that you have accurate information about the incident and can plan accordingly.
- For planned interruptions we will provide you with prior notice.
- You will be treated as priority during an event so we will aim to call you to understand the personal impact and support needed. We will also aim to contact you after the event to ensure that you are happy with the quality of your water.
- We can speak with your nominated contact on your behalf including notifying them of a supply interruption that is affecting you.
- We will provide you with bottled water during prolonged supply interruptions or emergencies (6 hours+).
- Signpost to any alternative tariffs or additional services that may be suitable.

Tier 2



Physical Impairment & other mobility restrictions

- If you need more time to get to the door when we visit let us know and we will knock and wait.
- Send text message service for unplanned supply interruptions so that you have accurate information about the incident and can plan accordingly.
- For planned interruptions we will provide you with prior notice.
- Deliver bottled water during a prolonged supply interruption (12 hours+).
- Our StreetWorks will consider the needs of those with reduced mobility.
- Our public sites will be wheelchair accessible.



Tier 2



Use of medical equipment

- If you need more time to get to the door when we visit let us know and we will knock and wait.
- Send text message service for unplanned supply interruptions so that you have accurate information about the incident and can plan accordingly.
- For planned interruptions we will provide you with prior notice.
- We can speak with your nominated contact on your behalf including notifying them of a supply interruption that is affecting you.
- Deliver bottled water during a prolonged supply interruption (12 hours+).



Tier 2



Difficulties answering the door

- Send text message service for unplanned supply interruptions so that you have accurate information about the incident and can plan accordingly.
- For planned interruptions we will provide you with prior notice.
- We can speak with your nominated contact on your behalf including notifying them of a supply interruption that is affecting you.
- We can work with your nominated contact to gain access in an emergency and discuss the provision of bottled water during a prolonged interruption.
- If you need more time to get to the door when we visit let us know and we will knock and wait.
- We will aim to contact you by telephone during water quality incidents
- Deliver bottled water during a prolonged supply interruption (12 hours+)

Tier 2



Developmental conditions

- Send text message service for unplanned supply interruptions so that you have accurate information about the incident and can plan accordingly.
- For planned interruptions we will provide you with prior notice.
- We can speak with your nominated contact on your behalf including notifying them of a supply interruption that is affecting you.
- We can send copies of bills to your nominated contact.
- Offer a range of communication channels so you can communicate with us in a way that suits you.
- We will provide bills in a format of your choice including alternative coloured paper and font size.
- We will communicate with you in a clear, simple tone avoiding jargon and with clear guidance on any actions needed.
- Deliver bottled water during a prolonged supply interruption (12 hours+)

Tier 3



Language Barriers (English as a foreign language/ unable to communicate in English or speed difficulties)

- We provide an interpreter service if you wish to contact us by phone. Just request this service when you contact us.
- We provide a translation tool on our website in over 200 languages called Recite Me.
- We will communicate with you in a clear, simple tone avoiding jargon and with clear guidance on any actions needed.
- We can speak with your nominated contact on your behalf including notifying them of a supply interruption that is affecting you.
- We can send copies of bills to your nominated contact.
- Send text message service for unplanned supply interruptions so that you have accurate information about the incident and can plan accordingly.
- Offer a range of communication channels so you can communicate with us in a way that suits you.

Tier 2



Families with young children aged 5 years or under

- Send text message service for unplanned supply interruptions so that you have accurate information about the incident and can plan accordingly.
- For planned interruptions we will provide you with prior notice.
- Where we are aware that there are children under the age of 12 months in the property, we may be able to deliver bottled water during a prolonged supply interruption (12 hours+).
- Where we are aware that there are children under the age of 12 months in the property, we will attempt to reach you by telephone during any water quality incidents.
- Signpost to any alternative tariffs or additional services that may be suitable.



Tier 2/3



Temporary support including life changes and post hospital recovery.

- We understand that there may be occasions when the need for any extra help is temporary.
- Services available may include the following depending on your needs.
- If you need more time to get to the door when we visit let us know and we will knock and wait.
- Send text message service for unplanned supply interruptions so that you have accurate information about the incident and can plan accordingly.
- We can speak with your nominated contact on your behalf including notifying them of a supply interruption that is affecting you.
- For customers who are recovering post hospital treatment we will deliver bottled water during a prolonged supply interruption (12 hours+).
- Signpost to any additional services that may be suitable.

Tier 3



Doorstep security

- Offer a password service of your choice which we will use when we visit you to help protect against bogus callers.
- If you prefer for someone else to be present when we visit, please let us know and we can work with you to arrange a suitable time and date for any appointments.
- We will send a text message on the day of a scheduled appointment to let you know when we will be with you.
- If you need more time to get to the door when we visit let us know and we will knock and wait.
- Our colleagues will carry identification that shows their name, photograph, logo, and telephone number to contact to verify their identity.
- Our colleagues will wait if you or a trusted person wishes to verify their identity.
- Our colleagues and those of any contractors we may use will follow the UK Water Industry Distraction Burglary Protocol.

Tier 3



Bereavement

- We provide a dedicated telephone number for you to notify us of a bereavement.
- We have a simple online form which you can use at a time that suits you to notify us of a customer passing away.
- Our colleagues have received training to support and guide you through what happens when you notify us.
- We promote extra services that might help simplify the admin for bereaved families.



Signing up to our Priority Services Register

When applying for priority services as an Affinity Water customer, you'll be asked to select the service or need that applies to you so that we can provide you with the support you need.

You can sign up online, through the post using an application form or directly over the phone.

We may also take direct registrations from third parties, such as relatives, carers, or charities, on your behalf if it's in your interest to do so.

We may also receive registrations and updates from other organisations such as wastewater companies, energy distribution network operators and energy suppliers.

Unplanned interruptions Incident Management

When an unexpected, prolonged incident is declared, our operational teams will mobilise to manage the incident. This will include how customers known to us on our Priority Services Register will be supported.

Definition of a prolonged incident is a loss of supply for over 6 hours.

Tier 1 customers – These are customers who need extra help and are most at risk from a supply interruption for example those who are water dependent or have a chronic serious illness. Customers in this category can expect one or more of the following:

- Telephone contact to understand the personal impact of the incident and what support is needed.
- We can notify your nominated contact that a supply interruption is affecting you.
- Regular text message service so that you have accurate information about the incident and can plan accordingly.
- We will aim to provide you with bottled water during emergencies – expected to be from 6 hours.
- Telephone contact post incident to check you are happy with the quality of the water, obtain feedback and if any other support is needed.

If a major incident happens overnight, we will send a SMS message to our Tier 1 customers.

Tier 2 customers – These are customers who need extra help if the incident continues for a prolonged period (12 hours or more). This includes reasons such as pensionable age, physical impairment, mobility restrictions, blind or partially sighted. Customers in this category can expect one of more of the following:

- Regular text message service so that you have accurate information about the incident and can plan accordingly.
- We can notify your nominated contact that a supply interruption is affecting you.
- We will aim to contact you by your chosen communication channel where this information is available.
- We'll aim to provide you with bottled water expected to be 12 hours+

Tier 3 customers – All other customers can expect one of more of the following:

- Regular text message service so that you have accurate information about the incident and can plan accordingly.
- Notifications on our website with details of bottled water stations where you will be able to collect water.



How we use and share your personal data

We collect and process your personal data for the provision of our priority services under the legal basis of 'a task carried out in the public interest'. Where we are required to process your special category data, such as medical conditions, we do so under the conditions of 'substantial public interest', specifically the safeguarding of children and individuals at risk.

We've carefully analysed our data needs against all relevant legislation and make sure we always have a lawful basis for any information we collect.

Your personal data is used for the following in relation to our priority services:

- To provide support based on what you need to access our services. This will be individual to you, such as sending you a bill in braille.
- To contact you and other customers in priority order during interruptions to your water supply. The priority order will be determined using the needs of each individual that is registered in the interrupted supply area.
- We may also use it to help improve your overall customer experience and to improve how we safeguard individuals at risk

We only share personal data held on the Priority Services Register with third parties if we have a fair and lawful basis to do so, such as when:

- It's in our legitimate business interests to do so
- We need to do so to discharge legal obligations and/or public functions
- We need to act to protect children and/or vulnerable adults
- We need to process special category data where there is substantial public interest
- A formal court order has been served upon us
- We're lawfully required to report certain information to the appropriate authorities, e.g. to prevent fraud or a serious crime
- It's needed for emergency planning reasons, such as for protecting the health and safety of others
- We are required to share data by one of our regulators

To ensure the ongoing safeguarding of our customers on our Priority Services Register we may share personal data with energy distribution network operators.

In addition, in the event of an emergency, we may share your personal data with the following authorities:

- Local Authorities
- Other water and wastewater companies operating in your area
- Police
- Fire and Ambulance Services
- Your energy supplier, such as your Electric or Gas supplier

What communication will you receive from us

Once you have signed up to the Priority Services register, we'll send you a welcome letter or email.

In the future this will confirm details of the support you can expect to receive.

We'll provide information on how you can let us know about changes to your situation or if you wish to be removed from the Priority Services Register.

If we receive a registration on your behalf, we'll write to you to confirm you've been added. You can ask to be removed, and we'll review your request to make sure it's in your best interests.

If we haven't heard from you within 2 years or received an update via one of our data share partners, we'll check in with you to make sure the details we have on file for you are still accurate. We'll send an email and/or text message and on occasions may write to you. If you receive an email or text message asking you to update your records, please do respond so that we can make sure we can support you in the right way.

When your record is updated, we will also contact you to let you know.

If you'd like to update or remove your details yourself, you can call us or visit MyAccount. If you'd like to remove your details from the Priority Services Register, we may check whether you have any other support in place, and we'll ask you to confirm you no longer wish to benefit from our priority services.

If you are dependent on water for your condition or use a dialysis machine, feeding pump or automated medication, we may advise you to update your details and stay on the register so we can support you in water supply related emergencies. However, you can ask to be removed, and we'll review your request to make sure it's in your best interests.

For further details about your right to access or change the personal data we hold about you, please view our main Customer Privacy Notice at affinitywater.co.uk/privacy

Our commitment to you

We'll always try and provide you with the best possible service. If we fall short of the standards, we set ourselves, we'll make sure we put it right. We await the findings of any changes to the GSS (Guaranteed Standards of Service) review and are committed to complying with the standards.

This is what you can expect if you are impacted by an interruption to your water supply.

If we're **planning to turn off your water supply** to carry out works on our network, we'll give you as much notice as possible, advising you when we expect to turn your water off and back on again.

- If we plan to turn off your water, we'll give you at least 48 hours' notice. If we fail to notify you of a planned interruption lasting more than four hours, we'll pay you £20. This does not apply to unplanned/emergency interruptions (see below).

- If we fail to turn your water back on by the time specified in our notice, we'll pay you £30 and a further £30 for each subsequent 12-hour period you have no water.

For **unplanned** interruptions, for example when your supply is cut off due to a burst water main, we'll notify you as soon as practicable when we expect to restore the supply and any information you may need about alternative supplies.

If we fail to restore your supply within 12 hours, we'll pay you £30 and a further £30 for each subsequent 12-hour period you have no water.

This is what you can expect when we agree an **appointment** with you:

- When an appointment is made, we must offer you a morning or afternoon appointment. We must also inform you of the times we consider to be morning or afternoon. If requested, we'll offer a specified two-hour time slot. If we fail to do this, you are entitled to £20.
- We must visit in the morning or afternoon as notified, or within the requested two-hour time slot. Where we have to cancel an appointment, we'll provide 24 hours' notice. If we fail to do this, we'll pay you £20

You won't need to claim any compensation as we will pay this automatically.



Our ambitions

Summary of our customer vulnerability strategy ambitions

This section indicates our ambitions together with an indication of timescales. We have also noted whether the activity supports the licence condition, Ofwat 'Service for All' guidance, PSR requirements or a combination.

Customer Vulnerability Strategy Ambitions	What this means	Timescale	Licence Condition	Service for all Guidance	PSR Review
PSR Reach - to tailor outreach to gaps in our PSR where our data suggests there is a potential need either by geographical location or 'reason code'.	Proactive outreach and targeted support for those customers who may not be aware of the services available	Short		3.1 & 5.2	
Expand PSR data share arrangements with other trusted organisations and support the water industry work on developing this process	Providing access to a wider range of support for customers who register for Priority Services with AW	Medium		3.4	
Expand data share arrangements with other trusted organisations such as local authorities, health agencies, charities	Customers are identified through our partner organisations and proactively provided support	Medium		3.4	
Identify other external accreditations which enhance how we support customers with additional needs.	Provides independent scrutiny and reassurance of how we meet the needs of customers in vulnerable circumstances	Medium		1.2	
Develop partnerships and establish a customer panel with vulnerability representation and insight from experts where appropriate.	Ensures that AW has the widest possible understanding of vulnerability and can ensure that our services support all customers	Medium		1.2	
Undertake annual vulnerability workshops with colleagues, stakeholders and vulnerability champions to continually improve our understanding and service.	Ensures that colleagues who deal with customers in vulnerable circumstances have a voice and can share feedback, and provide suggestions for improvements	Short		3.3	
Appoint vulnerability champions in each local team and across our business to act as a point of contact for their colleagues and to provide a local voice.	Ensures that feedback across our region can be shared and 'local' knowledge and feedback is shared to support the customer and share best practice	Short		3.3	
Appoint Senior Leaders and Directors across our business to act as vulnerability champions to ensure that customer vulnerability is embedded across all company operations	Provides reassurance, leadership, and commitment at board level to support customers and colleagues and create a vulnerability culture	Short		3.3	

Customer Vulnerability Strategy Ambitions	What this means	Timescale	Licence Condition	Service for all Guidance	PSR Review
Develop a network of referral partners including debt advice agencies to identify households eligible for financial support through reduced bill tariffs and other schemes	Working with trusted partners and building a network raises awareness and enables us to reach customers who may not seek out or be aware of support available	Medium		4.3	
Develop a 'portal/hub' with secure log on for referral partners to contact us, apply for affordability and non-financial support for clients.	Provides easy access via our online channels for referral partners to gain information on support available for their clients.	Long		4.3	
Customer vulnerability training delivered to all customer facing colleagues on an annual basis. Training adapted to emerging vulnerabilities and handling disclosures sensitively and compliantly.	Customers can be reassured in our interactions with them that our colleagues are trained to identify and provide support.	Medium		3.3	
Meter moved if cannot be read in its present location and/or help reading the meter (if meter cannot be moved)	Customers can be reassured that they will receive a tailored service where there are known extra help needs.	Medium			✓
UK Water Industry distraction protocol and National cold call protocol followed by AW front line technicians and contractors.	Customers can be reassured that during times such as during incidents where there is increased risk of harm that they will be kept safe.	Short			✓
Dedicated content targeted at customers in vulnerable situations including in locations where we have identified gaps in our provision of support both financial and non-financial	Customers who may not reach out for or be aware of support available will be proactively identified and offered support	Short		3.2	
Develop our Home Water Efficiency Visits to provide tailored advice including affordability support, energy efficiency advice and back up plans for customers who medically depend on water.	Customers will be better informed and in control of water consumption and reassured of the financial support available and what to expect during an incident	Medium		1.3	
Use a range of methods to highlight and raise awareness of support available for customers – such as customer personas, customer testimonies, colleague videos, case studies, trusted partner testimonies and community events.	Our communications will share information and be clear in a way that resonates with customers with differing needs and will ensure customers know what support is available, how they can access it and what to expect from us.	Short		3.2	
Use signposting tools to support customers receive help for a wide range of issues as well as financial support through debt advice agencies. We will include a 'warm' referral where possible	Customers are better informed about support available for a wide range of issues	Short	G3.6		
Priority Services Register customers post incident review surveys	Customers will have the opportunity to provide feedback on the service received which will support AW to continuously improve	Short		1.4	
Funding of local community projects and colleague 'volunteering' days	Working regionally with partners and supporting local projects will ensure that AW has a good understanding of the regional issues faced by our customers	Medium		3.2	

Customer Vulnerability Strategy Ambitions	What this means	Timescale	Licence Condition	Service for all Guidance	PSR Review
Work with 'one-stop' Bereavement partner	Provide options for a customer to notify organisations of the death of a loved one and reduce some of stress and anxiety	Short	G3.2		
Support public and stakeholder events with a focus on cost-of living and support through Priority Services Register	Proactive outreach and targeted support for those customers who may not be aware of the services available	Short		3.2	
Innovative trials such as rising block tariffs	Customers will be able to access the benefits of successful trials	Medium		1.3	
Development of a 'preference centre' for customers to state their communication choices.	Customers will be contacted by a method of their choosing in an accessible format most useful to them.	Medium		2.2	
Free leak repairs for the most vulnerable customers whose bills are being negatively impacted.	Support for households who are facing financial difficulties and unable to finance the cost of repairs will receive support.	Medium		1.3	
Provide an income maximisation service	Customers will receive information on how their income can be maximised thereby supporting with affordability	Medium	G3.6	1.3	
Telephone check in and support service during large scale incidents for PSR customers.	Customers who have a medically dependent need for water or a chronic serious illness will receive telephone contact from operational teams to discuss support need.	Short	G3.1		
Review of Priority Services Register welcome pack and other communications to ensure it is clear how customer data will be used.	Customers will be reassured that their data is being used in an appropriate legal manner	Short		4.4	✓
Review of Priority Services Register welcome pack and other communications to ensure it is clear what support customers can expect by being registered on the Priority Services Register.	Customers will be reassured what service and support they will receive including during an interruption to supply.	Short		1.2	✓
Use key guidance for inclusive design for example – 'Inclusive design in essential services' principles or an equivalent publication.	Customers/stakeholder groups will be reassured that AW is considering the needs of diverse consumers including vulnerable consumers.	Medium		2.1	
British sign language to be included in our most accessed videos.	Customers who use British Sign Language will have access to information in an accessible format most useful to them.	Medium		2.1	
Be proactive in considering and meeting the needs of different groups and preventing disadvantage.	Use data and insights to assess the impact on different groups and act to ensure greater equality and inclusion.	Medium		2.1	

Metrics

We have provided a table of measures we intend to use to test that our vulnerability strategy is delivering for our customers.

Number	Key Metric	24/25	25/26	26/27	Licence Condition	Service for all Guidance
1	Auto enrol customers onto tariffs	7.5K	8K	9K	G3.6	1.3
2	% of front-line staff receive customer vulnerability training	68%	85%	90%		3.3
3	PSR Reach - % of connected households registered on PSR	13.29%	14.92%	16.50%		3.1 & 5.2
4	% of customers where contact has been attempted to update their PSR records every 2 years	90%	90%	90%		4.2
5	% of customers where contact has been completed to update their PSR records every 2 years	52.10%	35%	35%		4.2
6	Vulnerable customer satisfaction score – ease and satisfaction scoring 7-10 – 4 measures - average	87%	90%	90%		1.4
7	PSR customer satisfaction score post incident		90%	90%		1.4
8	Independent assessment of BSI ISO 22458 standard	achieved	achieve	achieve		1.2
9	Planned dedicated content/campaigns - reach	650K	530K	530K		3.2
10	Develop partnerships – establish customer panel with vulnerability representation and insight from experts where appropriate	New	Yes	Yes		1.2 & 2.3
11	Data sharing arrangements – utilities and other agencies	3	5	7		3.4

Metrics

We have provided a table of measures we intend to use to test that our vulnerability strategy is delivering for our customers.

Number	Key Metric	24/25	25/26	26/27	Licence Condition	Service for all Guidance
12	PSR need code gap analysis – use data to target areas for support and increase PSR/tariff take up	New	To be confirmed each year	To be confirmed each year		3.2
13	Number of households receiving financial support through reduced bill tariffs	127K	134K	TBC		1.3
14	Number of households receiving financial support through debt respite schemes	125	250	500		1.3
15	Number of households supported with 'cost of living' payment	56K	60K	38K	G3.6	1.3
16	Develop awareness of support available through either affordability support or inclusive service such as PSR by 2030	43%	50%	60%		

Case studies



Case Study 1

Water Assistance Payments – Supporting households with Cost-of-Living

Objective

Since October 2022 we developed and piloted this support with our partners Age Concern Luton and Citizens Advice Bureau Luton. With their help, we developed the referral scheme and agreed the criteria as follows:

- Benefit delay/issue.
- Awarded a foodbank voucher.
- Awarded a fuel voucher.
- Extra costs due to a disability

Since then, we have connected 30K households with this support. Majority of these have been identified using our own segmentation data. We have aimed this support at households identified as 'feeling the strain.' Eligible households have then received a credit which is applied directly to their account.

The award is equivalent to approx. 6 months of a Low-Income Fixed Tariff water bill or 25% off the average water only bill.

Working with Partners

As a result of the above, in 2023 we expanded the number of referral partners and now have ten organisations who partner with us and can refer residents including all the Citizens Advice Bureau (CAB) offices who operate within our supply area.

Working in partnership has given us the opportunity to support in different ways, for example, the Borehamwood foodbank is a referral partner, and we also provide regular surgeries at the centre to support their clients and talk them through ways in which they could be eligible for reduced bill tariffs or other support.

Looking forward

This support will continue throughout 2025-2030 and we aim to double the level of support to 60K households.

For 2025 we have already identified households 'feeling the strain' in our annual billing plans and we have proactively awarded around 31K households with the £50 relief payment equivalent to £1.5m which will show on their 25/26 annual bill.

We will continue to use our data sharing arrangement with DWP and with the credit reference agency TransUnion to identify eligible households for reduced bill tariffs and other support.

Case Study 2

Supporting our local community projects – Small Acts of Kindness



Objective

Colleagues have volunteered at a local charity by using their Affinity Day to pack Warm in Winter gift bags.

What we did

The cost-of-living crisis is affecting us all and more than ever this year many older people will find it even harder to heat themselves and eat and are facing the unimaginable and impossible choice between heating their homes and buying food.

The charity Small Acts of Kindness aims each winter to source and distribute up to 10,000 gift bags that will help older people keep warm in their homes.

The Warm in Winter gift bags contain essential, practical, keep warm items for older people including a fleece blanket, thermal hat, gloves, socks, a mug and hot drinks. All the gift bags contain a comprehensive pack of literature that signposts relevant activities and services for older people.

Affinity Water provided 13,500 leaflets to the charity containing information on our Priority Services Register and reduced bill tariffs and colleagues across the business supported the charity by putting together the information packs and packing the gift bags.

A colleague said:



At Affinity Water we are delighted to support local projects and Small Acts of Kindness reach so many of our elderly residents in Hertfordshire & Bedfordshire with their warm in winter gift bags. The gift bags make a huge difference and contain lots of information to help break the cycle of loneliness and isolation. It's always enjoyable to work with the charity each year to help pack the gift bags or information packs. If you have the chance to join in and use an Affinity Day please do so – you won't regret it.



Case Study 3

Donating to local community projects – Liberty Tea Rooms, Borehamwood Food Bank and the Red Shed project

Objective

Affinity Water supports local community projects with our partner Herts Community Foundation who manage a charitable fund on behalf of Affinity Water Foundation. Over the last few years, we have supported different projects each of which supports our communities in a different way.



What we did – Liberty Tea Rooms

In June 22 a donation of approx. £4500 was provided to Liberty Tea rooms and Community Hub in Hemel Hempstead to help run its debt advice clinic. The funds were needed to support the Christians Against Poverty Debt centre, to help 50 new people with financial budgeting, casework and insolvency service.

A colleague said:

"We are pleased to work with Hertfordshire Community Foundation to support this wonderful project. We understand the importance of a community hub and are delighted to be able to support in this way. We know how important it is to seek debt advice early and to get the right advice according to individual needs. As the UK's largest only water Company we are determined to reach out and help those seeking debt advice as we know the numbers needing help are growing as the cost of living rises."

What we did – Borehamwood Foodbank

In March 23 a donation of approx. £4400 was provided to Borehamwood Foodbank to help with its clients' energy costs.

The Borehamwood Foodbank helps people in crisis with food, fuel vouchers, free school uniform, and access to information about benefits.

Our relationship with Borehamwood foodbank has developed and we have provided further support to the charity and its clients by holding a regular 'surgery' at the foodbank so folks can come and speak with an Affinity Water colleague to ensure that they are on the right tariff for their circumstances and are added to the Priority Services Register where relevant.

In addition, our colleagues have also used 'Affinity days' to help in the background with packing and sorting.

What we did – Red Shed project

In April 24 a donation of approx. £4200 was provided to the Red Shed Garden Project to aid those living with dementia.

The grant funding provided by Affinity Water and Herts Community Foundation will enable The Red Shed Garden Project to expand its services and reach more beneficiaries. These funds will support the operation of four garden clubs, offering tailored activities designed to meet the diverse needs and abilities of participants.

The Red Shed Garden Project, based in North Herts, provides a vital lifeline to those affected by dementia by offering horticultural therapy, gardening activities, and social interaction opportunities. By fostering connections and engagement through nature-based activities, the project seeks to combat isolation and enhance the overall well-being of participants and their caregivers.

Affinity Water are providing funding towards Garden Clubs for people with a dementia diagnosis and their carers. They are led by a qualified workshop leader supported by experienced volunteers; the clubs meet participants' needs and abilities whilst ensuring that everyone benefits from their time at The Red Shed.

Varied activities can include garden maintenance; propagating flowers, fruit and vegetables; garden inspired arts and crafts; creating wildlife-friendly spaces and learning gardening techniques to use at home.

Through gardening The Red Shed Garden Project aims to reduce isolation and improve mental and physical wellbeing for each participant with each session including social time for interacting and building new relationships.

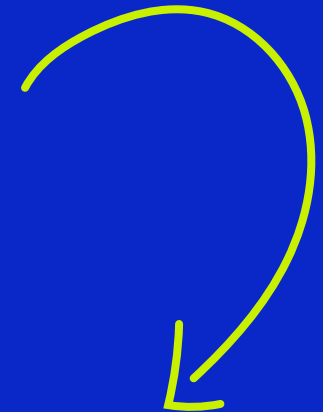
A colleague said:



Our support for The Red Shed Garden Project reflects our dedication to making a positive impact on the communities we serve. We recognize the importance of initiatives like this in addressing social isolation and improving the quality of life for individuals living with dementia.



Appendices



Appendix A – PSR needs codes table

Affinity Water has over 190K households registered on the Priority Services Register. Households can have one or more needs code recorded. This equates to over 350K individual needs codes recorded. The table below shows the breakdown as at January 2025.:

Need code	Total count	Percentage %
Blind	5,390	1.31
Speech impairment	3,650	0.89
Physical impairment	50,066	12.19
Water Dependent	11,736	2.86
Mental health	24,228	5.9
Hearing impairment including deaf	13,265	3.23
Learning difficulties	1,540	0.37
Chronic serious illness	55,740	13.57
Developmental condition	10,095	2.46
Pensionable age	85,619	20.85
Dementia/cognitive impairment	5,136	1.25
Braille	162	0.04
Large print	4,455	1.08
Audio CD bills	85	0.02
Partially sighted	6,110	1.49
Unable to communicate in English	2,075	0.51
Careline or Telecare system	3,305	0.8
Additional presence preferred	1,759	0.43
Temporary life changes	5,173	1.26
Temporary post hospital recovery	2,995	0.73
Temporary - Young adult householder	598	0.15
Families with young children 5 or under	29,718	7.24

Need code	Total count	Percentage %
Poor sense of smell and/or taste	2,213	0.54
Unable to answer the door	3,291	0.8
Restricted hand movement	6,039	1.47
Heart, lung, or ventilator equipment	2,345	0.57
Dialysis, feeding pump, or automated medication	942	0.23
Oxygen concentrator	600	0.15
Nebuliser or apnoea monitor	2,847	0.69
Medical-dependent showering	4,427	1.08
Medicine refrigeration	6,936	1.69
Stair lift, hoist, or electric bed	4,318	1.05
Oxygen use	979	0.24
Knock and Wait	22,191	5.4

We will use this data in proactive ways for example:

- Proactively ensure that households who have disclosed that they are water dependent or have Chronic Serious Illness are on the most appropriate tariff such as Watersure.
- Proactively ensure that households with pensionable age need code are on the most appropriate tariff such as our reduced bill tariff LIFT – Low Income Fixed Tariff. Those households with a single adult occupier and a qualifying benefit may be entitled to a higher level of discount.
- To work with our energy partners (UKPN & SSEN) to identify any need code/location that is underrepresented that we wish to develop together with targeted campaigns.

Appendix B – Table of research conducted

ID	Report Author	Publication Date	Report Title	Commission Source	Key Sources	General Contents	Overall Robustness	Vulnerability Contribution
3	CCW	31/10/2019	Vulnerability in the Water sector	External	CCW	Best Practice Guidelines	1.7	3.0
4	CCW	26/05/2021	Low-income households' experiences of water bill affordability and support	External	CCW	Research Report	2.7	3.0
5	CCW	07/06/2020	Water voice May- June 2020	External	CCW	Research Report	2.3	3.0
12	CCW/OFWAT	30/10/2020	Water for All report and Vulnerability Report	External	CCW	Research Report	1.0	3.0
51	Water UK	21/04/2021	Quantitative analysis of water poverty in England and Wales	External		Research Report	3.0	3.0
86	incling	29/11/2021	Topic 07: Transient Vulnerability & flexible Payments	Internal	Water Community	Research Report	2.0	3.0
109	ONS	26/09/2019	English Indices of Deprivation File 7	External		Data Tables	1.7	3.0
110	Affinity	21/04/2022	Customers in Vulnerable Circumstances full year 2021-22	Internal	Voice of the Customer	Research Report	1.0	3.0
169	Scope	17/11/2022	Do The Right Thing: Supporting disabled people through the cost-of-living crisis	External		Article/Press Release	1.3	3.0
170	Blue Marble	30/11/2020	Affinity Water Social Tariffs Research	Internal		Research Report	2.1	3.0
215	Eftec	20/06/2023	Social Tariff Customer Preferences Research	Internal	PR24	Research Report	3.0	3.0
253	Community Research	28/06/2023	Affinity Water Business Plan Acceptability research with vulnerable and future customers	Internal	PR24	Research Report	2.0	3.0
128	Savanta	06/04/2022	Customer spotlight: People's views and experiences of water [full report]	External	CCW	Research Report	2.0	2.0
143	incling	02/05/2022	Topic 22: Price Re ver	Internal	Water Community	Research Report	2.0	2.0
155	CCW	07/07/2022	Independent review of water affordability - one year on	External	CCW	Best Practice Guidelines	1.0	2.0
157	Blue Marble	31/08/2022	What does Britain want the new Prime Minister to do about the cost of living?	External		Research Report	1.7	2.0
175	Ofwat	01/12/2022	Cost of living: wave two Water customers' experiences	External		Research Report	1.7	2.0
210	Ofwat	30/05/2023	Cost of living: wave three - Water customers' experiences	External		Research Report	1.7	2.0

ID	Report Author	Publication Date	Report Title	Commission Source	Key Sources	General Contents	Overall Robustness	Vulnerability Contribution
2	CCW	21/02/2021	Water Voice - Views of current and future bill payers	External	CCW	Research Report	2.7	1.0
33	UCL (mention in qual report UCM, Ofwat research Listen,Care)	01/11/2020	Financial inequalities widen due to Covid-19	External		Article/Press Release	1.0	1.0
34	Citizen Advice	16/12/2020	Covid drives over half a million people into the red on energy bills	External		Article/Press Release	1.0	1.0
75	Ofwat	01/11/2021	Service delivery report 2020-21	External		Research Report	2.0	1.0
123	DJS	27/07/2022	Water Matters 2021-22 Household Customers' views on their water & Sewerage Services	External	CCW	Research Report	1.3	1.0
130	incling	15/08/2022	Topic 33: Rising Block Tariffs	Internal	Water Community	Research Report	2.3	1.0
154	CACI	28/04/2022	Introducing your Water Use Personas	Internal		Research Report	1.7	1.0
187	Kantar Public	09/01/2023	Demand reduction behavioural research: Customer survey and qualitative research findings	Internal	PR24	Research Report	2.7	1.0
199	Eftec/ICS	12/04/2023	Customer Priorities for Long term Ambitions	Internal	PR24	Research Report	2.9	1.0
200	ICS	16/11/2022	Customer Priorities for long-term ambitions	Internal	PR24	Research Report	2.5	1.0
207	Eftec	19/05/2023	Customer Priorities for Long Term Ambitions	Internal	PR24	Research Report	3.0	1.0
208	Eftec	19/05/2023	Customer Priorities and Values Research Summary Report	Internal	PR24	Research Report	2.9	1.0
238	Affinity Water	28/06/2023	Affinity water YWYS notes	Internal	PR24	Other	1.0	1.0
249	Ofwat	08/12/2022	Water company performance report 2021-22	External		Research Report	2.0	1.0
256	Eftec	10/08/2023	Customer Values for Service Improvements – Technical Report	Internal	PR24	Research Report	2.9	1.0

Appendix C – Service for all guidance spreadsheet

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>Currently</p> <ul style="list-style-type: none"> Alternative communication formats including braille, large print, audio, coloured paper and bespoke font sizes. Range of communication channels for customers to contact us - phone, email, WhatsApp, webchat, post Range of payment methods offered Bottled water delivered during incidents. Language interpreter service British Sign Language interpreter service AA rated website meets WCAG accessibility requirements Internal tone of voice guidelines for easy read for customer comms Full range of PSR services including password and knock and wait Nominated third parties for billing and incident management <p>Future plans</p> <ul style="list-style-type: none"> Enhance our telephone check and support service during large scale incidents for PSR customers to include post incident check in Continue research, engagement and feedback programme to understand differing customer needs and adapt services as appropriate 	<ul style="list-style-type: none"> Monthly reporting of performance - PSR Reach Monthly reporting of PSR customer satisfaction score Dashboard of PSR customer feedback PSR customer satisfaction score post incident Senior level review of vulnerability targets/metrics including quarterly Executive review. 	<ul style="list-style-type: none"> Consistency across all areas of company operations 	<ul style="list-style-type: none"> PSR reach - % of households registered for additional support
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>Currently</p> <ul style="list-style-type: none"> Customers receive a welcome letter/email when signing up to the Priority Services Register This communication also provides information on financial support which was the action that we piloted as part of the CCW affordability recommendations review. Vulnerability strategy will provide clarification on services that customers can expect to receive, including during an incident. Nominated third party incident management service. <p>Future plans</p> <ul style="list-style-type: none"> Achieve additional external accreditations to provide independent scrutiny and reassurance of how we meet the needs of customers in vulnerable circumstances Develop partnerships and establish a customer panel with vulnerability representation and insight from experts where appropriate. Review of Priority Services Register welcome pack and other communications to ensure it is clear what support customers can expect by being registered on the Priority Services Register. Continual benchmarking of the level of nature and support available to customers across other water companies and related sectors. 	<ul style="list-style-type: none"> Independent assessment through BSI annual accreditation Monthly reporting of PSR customer satisfaction score PSR Customer satisfaction score post incident Dashboard of PSR customer feedback Senior level review of vulnerability targets/metrics including quarterly Executive review. 	<ul style="list-style-type: none"> Processes for provision for Priority Services Register needs to be agreed across all areas of company operations. 	<ul style="list-style-type: none"> PSR Customer satisfaction score PSR Customer satisfaction score post incident

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>Currently</p> <ul style="list-style-type: none"> We have a £50 water assistance scheme and we work with referral partners who support customers with a wide range of challenges. We have recently implemented a tariff trial (rising block tariff) to test different methods of improving affordability and fairer charging. Vulnerable customer persona that is considered during 'customer journeys' so customers can see an example of what to expect in their situations Smart metering - vulnerable customer consideration <p>Future plans</p> <ul style="list-style-type: none"> Develop our Home Water Efficiency Checks visits to provide tailored advice including affordability support and back up plans for customers who medically depend on water. Free leak repairs for the most vulnerable customers whose bills are being negatively impacted Provide an income maximisation service There are further plans to tailor communications in our customer journeys to support specific areas of vulnerability. This means we'll be able to send alternative format communications to different customer segments or those on the PSR. 	<ul style="list-style-type: none"> Monthly reporting of targets Senior level review of vulnerability targets/metrics including quarterly Executive review. 	<ul style="list-style-type: none"> Processes for provision for Priority Services Register needs to be agreed across all areas of company operations. 	<ul style="list-style-type: none"> Number of households auto enrolled onto reduced bill tariffs. Number of households receiving financial support through reduced bill tariffs Number of households receiving support through debt respite schemes Number of households supported with cost-of-living payment
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	<p>Currently</p> <ul style="list-style-type: none"> We have survey data which is used for the bespoke performance commitment on 'Make it Easy' for financial and non-financial vulnerability. This is compared to wider customer base. Verbatim comments used to form various dashboards including cost-of-living and vulnerable keywords. Speech analytics 'listening' for indicators of vulnerability Water community panel has provided feedback on areas for consideration Assessment by BSI re standard ISO 22458 Independent Challenge Group - Subgroup of ICG focus on company affordability and vulnerability work. Colleague panel <p>Future plans</p> <ul style="list-style-type: none"> Expand our PSR customer surveys to include post incident review surveys 	<ul style="list-style-type: none"> Monthly reporting of performance - PSR Reach Monthly reporting of PSR customer satisfaction score PSR customer satisfaction score post incident Dashboard of PSR customer feedback Senior level review of vulnerability targets/metrics including quarterly Executive review. 	<ul style="list-style-type: none"> Ownership of data, dashboards, direct qualitative engagement and shared experiences 	<ul style="list-style-type: none"> PSR customer satisfaction score PSR customer satisfaction score post incident

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	<p>Currently</p> <ul style="list-style-type: none"> • Language interpreter service • British Sign Language interpreter service • Tone of voice brand guidelines and check of all customer comms. • Recite me on website • Alternative formats • Coloured paper for comms • Subtitled videos • Customer research and engagement programme undertaken which has shaped company plans. <p>Future plans</p> <ul style="list-style-type: none"> • Use key guidance for inclusive design for example – 'Inclusive design in essential services' principles or an equivalent publication. • British sign language to be included in our most accessed videos. 	<ul style="list-style-type: none"> • Independent assessment through BSI annual accreditation • Evidence retained of how customer insights/inclusive design/research/stakeholder feedback has been incorporated when making significant changes to proposed services impacting on customers with additional needs. • Senior level review of vulnerability targets/metrics including quarterly Executive review. 	<ul style="list-style-type: none"> • Wide range of dialects and languages across supply network challenging to meet all customer needs in terms of use of alternative languages on comms etc. 	<ul style="list-style-type: none"> • Independent assessment of BSI ISO 22458 standard • Exploring additional accreditation
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>Currently</p> <ul style="list-style-type: none"> • Third party process and policy in place which allows for third party billing arrangements • Third party notification for incident support also available • Customers registered on PSR will receive a tailored message separate to other customers • Contact channels - Phone, Email, Whatsapp, post, Social Media <p>Future plans</p> <ul style="list-style-type: none"> • Development of a 'preference centre' for customers to state their communication choices 	<ul style="list-style-type: none"> • Monthly reporting of PSR customer satisfaction score • Dashboard of PSR customer feedback • Senior level review of vulnerability targets/metrics including quarterly Executive review. 	<ul style="list-style-type: none"> • Due to rapidly changing situation of managing an incident digital comms are used and therefore the needs of digitally excluded are not always met. 	<ul style="list-style-type: none"> • PSR customer satisfaction score

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>Currently</p> <ul style="list-style-type: none"> We currently engage with CCW and our Independent Challenge Group when making significant changes, such as to tariff approaches, social tariffs etc, with a focus on the needs of vulnerable customers Provided interpreter and sign language interpreter service during recent consultation and engagement activities Water community panel <p>Future plans</p> <ul style="list-style-type: none"> Develop partnerships and establish a customer panel with vulnerability representation and insight from experts where appropriate. 	<ul style="list-style-type: none"> Evidence retained of how customer insights/inclusive design/research/stakeholder feedback has been incorporated when making significant changes to proposed services impacting on customers with additional needs. Evidence to be presented during annual BSI accreditation to ISO 22458 standard 	<ul style="list-style-type: none"> Identifying, funding and ownership of appropriate programme of working with third sector organisations 	<ul style="list-style-type: none"> Develop partnerships and establish a customer panel with vulnerability representation and insight from experts where appropriate and provide evidence of involvement in vulnerability strategy.
3.1	Companies should take active steps to identify customers who require extra help who have not yet been identified.	Compliant	<p>Currently</p> <ul style="list-style-type: none"> Ad-hoc events aimed at supporting with cost of living and promoting PSR. Small scale local data sharing projects for both affordability and non-affordability markers. Working with a group of referral partners to reach customers eligible for water assistance payment DWP partnership to identify households eligible for reduced bill tariffs and PSR Two-way data sharing arrangements in place with DNO's <p>Future plans</p> <ul style="list-style-type: none"> Proactive outreach and targeted support for those customers who may not be aware of the services available 	<ul style="list-style-type: none"> Monthly reporting of targets Senior level review of vulnerability targets/metrics including quarterly Executive review. 	<ul style="list-style-type: none"> Funding partnerships such as Kidney Care and resourcing for a dedicated outreach team or plan. 	<ul style="list-style-type: none"> PSR reach - % of households registered for additional support Awareness of either affordability or inclusive service support such as PSR

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>Currently</p> <ul style="list-style-type: none"> Regular raise awareness or extra help services including PSR across a range of channels including letters, emails, social media and web (banners) Raise awareness of services to customers that do not currently require extra help via emails, letters, social media that promote the benefits of saving water on reducing water and energy bills, with the secondary messaging of help to pay. This supports raising awareness with family or friends. <p>Future plans</p> <ul style="list-style-type: none"> Dedicated content targeted at customers in vulnerable situations including in locations where we have identified gaps in our provision of both financial and non-financial support Use a range of methods to highlight support available for customers such as customer personas, customer testimonies, colleague videos, case studies, trusted partner testimonies. Use signposting tools to support customers receive help for a wide range of issues as well as financial support through debt advice agencies 	<ul style="list-style-type: none"> Annual review of progress in closing the PSR need code gap/geographical focus as determined during the year. Analysis of results of any dedicated content/campaigns and sharing with partners where relevant Senior level review of vulnerability targets/metrics including quarterly Executive review. 	<ul style="list-style-type: none"> Funding for alternative ways of raising awareness that do not rely on digital 	<ul style="list-style-type: none"> Planned dedicated content/campaigns - reach. Using analysis of PSR reach and geographical data identify need code/area for focus during the year and publish results
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>Currently</p> <ul style="list-style-type: none"> Vulnerability training included in induction Dementia Friends training completed in induction Basic eLearning for all colleagues Additional eLearning training for customer facing colleagues Pilot for technicians Bite size topics covered throughout the year. <p>Future plans</p> <ul style="list-style-type: none"> Undertake annual vulnerability workshops with colleagues and stakeholders Vulnerability champions to be appointed in each local depot/directorate to act as a point of contact for their colleagues Senior leader/director to be appointed as vulnerability champion Customer vulnerability training deliver to all customer facing colleagues on an annual basis. 	<ul style="list-style-type: none"> Annual outputs and results of workshops with vulnerability champions/experts shared with senior leaders. Monthly reporting of colleagues training metrics Senior level review of vulnerability targets/metrics including quarterly Executive review. 	<ul style="list-style-type: none"> Agreement of role specific training across all areas of company operations. Ensuring content includes any emerging areas of vulnerability 	<ul style="list-style-type: none"> % of front-line staff receiving customer vulnerability training Vulnerability champions/experts for each directorate with annual workshops for feedback

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>Currently</p> <ul style="list-style-type: none"> Small scale local data sharing projects for both affordability and non-affordability markers in place. Two-way data sharing arrangements in place with DNO's Currently working with our utility partners on developing PSR data sharing for maximum effectiveness and reducing level of exceptions <p>Future plans</p> <ul style="list-style-type: none"> Expand PSR data share arrangements with other trusted organisations such as local authorities, health agencies and charities and support the water industry on PSR data sharing. 	<ul style="list-style-type: none"> Annual reporting of number of new data sharing arrangements Annual reporting on impact of data sharing arrangements 	<ul style="list-style-type: none"> Creating data sharing arrangements wide a wide number of local authorities or other organisations can be a long process due to different levels of appetite and engagement amongst partner organisations. 	<ul style="list-style-type: none"> New data sharing agreements with a number of trusted partners/agencies that support with either financial or non-financial support
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>Currently</p> <ul style="list-style-type: none"> Data protection requirements met for storage and handling of PSR data. Privacy notice specifically for PSR which is updated regularly. We use industry standard needs codes to ensure customer is added to the PSR for the appropriate reason. Noting of service needs such as 'knock and wait' on customer accounts <p>Future plans</p> <ul style="list-style-type: none"> Review of PSR communications to ensure it is clear the service provision that customers can expect Colleague refresher training to include emerging vulnerabilities and how to handle disclosures in a respectful and compliant way. 	<ul style="list-style-type: none"> Monthly reporting of performance - PSR Reach Monthly reporting of PSR customer satisfaction score PSR customer satisfaction score post incident Dashboard of PSR customer feedback Senior level review of vulnerability targets/metrics including quarterly Executive review. 	<ul style="list-style-type: none"> The service provision for Priority Services Register needs to be agreed across all areas of company operations. 	<ul style="list-style-type: none"> PSR customer satisfaction score PSR customer satisfaction score post incident
4.2	Companies' records should be reviewed regularly to ensure they are up to date.	Compliant	<p>Currently</p> <ul style="list-style-type: none"> Robust contact strategy in place undertaken by email and SMS. Welcome comms confirms to customer that they will be contacted to update details on a regular basis Contact centre colleagues will make the most of every contact and ensure that customer records are up to date and proactively identify whether financial support through tariffs or non-financial support through Priority Services Register is offered to the customer. 	<ul style="list-style-type: none"> Monthly reporting of performance - PSR data checking Senior leader review of vulnerability targets/metrics 	<ul style="list-style-type: none"> PSR database requires development in line with enhanced energy/water data sharing plans 	<ul style="list-style-type: none"> % attempted and actual contacts to PSR.

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>Currently</p> <ul style="list-style-type: none"> PSR data sharing with energy sector in place and files are produced in the appropriate format for sharing. PSR indicators including service need of 'knock and wait' noted on field teams Brook FX system GIS system indicates a PSR property Billing system provides a class code to indicate PSR property Colleague facing system indicates reason why customer is on PSR and can be updated easily by colleagues. <p>Future plans</p> <ul style="list-style-type: none"> Develop a network of referral partners including debt advice agencies to identify households eligible for support through reduced bill tariffs and other schemes. Develop a portal/hub with secure log in for referral partners to contact us, apply for affordability and non-financial support for clients. 	<ul style="list-style-type: none"> Annual reporting of number of new data sharing arrangements Annual reporting on impact of data sharing arrangements 	<ul style="list-style-type: none"> Number of systems in use across the organisation mean that there are inconsistencies in how PSR data is shown and used. 	<ul style="list-style-type: none"> New data sharing agreements with a number of trusted partners/agencies that support with either financial or non-financial support
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>Currently</p> <ul style="list-style-type: none"> PSR privacy notice is available and referred to in welcome comms which explains how data is used and shared. Colleagues read a declaration to the customer when they sign up for PSR <p>Future plans</p> <ul style="list-style-type: none"> Review of PSR welcome pack and other communications to ensure it is clear how customers data will be used Develop partnerships and establish a customer panel with vulnerability representation and insight from experts where appropriate. 	<ul style="list-style-type: none"> Monthly reporting of performance - PSR Reach Monthly reporting of PSR customer satisfaction score PSR customer satisfaction score post incident Dashboard of PSR customer feedback Senior level review of vulnerability targets/metrics including quarterly Executive review. 	<ul style="list-style-type: none"> Development of vulnerability panel/experts 	<ul style="list-style-type: none"> PSR customer satisfaction score PSR customer satisfaction score post incident
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	Included in our vulnerability strategy	<ul style="list-style-type: none"> Independent review and assessment of vulnerability strategy 	<ul style="list-style-type: none"> The strategy contains multiple elements across all areas of company operations 	<ul style="list-style-type: none"> Independent review and assessment of vulnerability strategy
5.2	Companies should take steps to understand the likely underlying requirements for extra help in their areas.	Compliant	Included in our vulnerability strategy	<ul style="list-style-type: none"> Independent review and assessment of vulnerability strategy 	<ul style="list-style-type: none"> The strategy contains multiple elements across all areas of company operations 	<ul style="list-style-type: none"> Independent review and assessment of vulnerability strategy

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