No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
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. **Compliance : COMPLIANT**	Our service promise • We provide bills and communications in different formats • We have a variety of contact channels, including live chat, a language line and BSL interpretation services. • If a customer needs a meter reading, but isn't able to do it themselves, we will do this for them. • We offer a 'knock and wait' and password service for when we visit customers' homes. • We will ensure that we capture third party or nominee details, so that they can speak to us, when it becomes difficult for the customer to contact us. • We offer discounted water tariffs and schemes to support customers to help make their bills more affordable. • For customers who are medically dependent on water, we will provide bottled water during a supply incident. We will contact customers to check if this is needed in line with our approach to managing incidents. • We recognise transient vulnerabilities can have an impact on customers who may need support for a short period of time, or a more detailed handholding approach In addition to our service promise, we are working with local community organisations and charities to co-develop and endorse more bespoke service offerings for customers and liaised closely with them over our customer commitments and gained their endorsement. This will form part of a continuous improvement plan to ensure we do this for all PSR considerations, to ensure we provide a view of the customer voice with these characteristics. One of our key priorities is to ensure customers know what to expect from us when they need help to keep them safe and provide peace of mind. We have a tiered approach to incident management, which outlines the support customers will receive during unplanned supply interruptions. In the event of an incident and a prolonged interruption to supplies, our extra care team will contact priority 1 customers first to ensure we meet their needs. We will then aim to contact all other customers as quickly as possible after this. If we are planning to interrupt a customer's supply, for example to do routine maintenance, we follow the following steps: 1. Review PSR data so we understand who may be impacted by any supply interruptions; 2. Contact all PSR customers in advance to let them know the work is happening; 3. Let customers know when work is completed; and 4. Check their satisfaction with our service. We are also delivering a community-led approach to help support customers with our metering programme by recruiting specialist customer and community roles.	• We will test our emergency supply interruption priority with customers and incorporate industry best practice. • We will use the socio-demographic modelling and forecasting outputs to set PSR growth targets based on highest risk of harm and biggest gap. • We will assess how our socio-demographic profiling at a Lower-layer Super Output Area (LSOA) level can be effectively used to inform our approach to supporting customers in vulnerable situations during a supply incident – e.g. by identifying which vulnerabilities are most prevalent in the area impacted. • We will continuously review our approach to managing incidents and customer communication to ensure we evolve and improve our approach to meet customers' needs. For example, we have held a number of workshops to better map the customer journey and engaged with our H2Online Communities (including a group called Priority Watch) to further improve our SMS, website and letterbox postcard communications during a planned or unplanned supply interruptions. • We will embed engagement in decision making, with an annual review of the support services we offer.	Scale/projections of vulnerability vs resources and ability to deliver against expectations - need to establish how far we can go built around a prioritisation approach.	• By 2030 80% of PSR customers are satisfied with the channels and solutions provided. • By 2030, 80% or more of our 'Priority 1' PSR customers are satisfied with the service they received during and/or post an interruption to their water supply.

No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
1.2	Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand. **Compliance : COMPLIANT**	Our aim is that all our customers can access the water services they need, when they need it. Our mainstream services are as accessible as they can be for the largest number of people without the need for tailored support. We are improving the accessibility of our website by partnering with Recite Me. This will provide our customers the ability to use our website in a way that is more suitable for them. We regularly share a view of all the support available to customers. This features on our bills/communications/websites/advertised on our contact channels and widely communicated with our extensive stakeholder network. When a customer signs up for our PSR we let them know what support we will provide if they need it. We also understand the importance of checking that a customer still needs support. So, every two years we will check that the information we hold is still relevant, if appropriate. Joining our PSR •You can do this over the phone, face-to-face or online and when you join, we will tell you about the support that is available to Contacting us •You can contact us in a way that works for you; when you do, we will check that your circumstances have not changed In a supply interruption •Depending on the type of support you are registered for, we will contact you to offer our support Checking in •Every two years, if appropriate, we will contact you to make sure your details are up to date If you no longer need support •You can tell us if your circumstances change in a way that works for you. If you need to, you can re-join at anytime Once registered for the Priority Services Register, we will send a letter/email to the customer to confirm they are on the register and outline the support they will receive. Our PSR uses a tiered approach to support and each letter will follow the tier of the consideration for the customers circumstances. If needed, we will offer appropriate compensation in line with the latest Guaranteed Standards Scheme (GSS) payment guidance from the Department for Environment, Food and Rural Affairs (Defra).	• Customers on PSR will be asked to rate the service they have received. • Conduct deep dive of customers journeys incorporating a view of satisfaction through point of contact surveys • We will continue to seek feedback from community stakeholders and organisations to co create the services our customers expect, using their expertise to design services so they are meaningful and endorsed.		Customer awareness of affordability support is no less than 55% by 2030 (current performance 50%) By 2030 80% of PSR customers are satisfied with the channels and solutions provided. Customer awareness of PSR is no less than 40%, by 2030 (current performance 33% - to be re-baselined in 2028). % of our customers feel supported to pay (we will benchmark the target for this metric in year 1)

No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
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. **Compliance : COMPLIANT**	We have made a significant investment in 2025 to better understand the socio-demographics of the populations we serve. This is to help inform our strategic approach to designing and targeting customer support for 2025-30 and longer-term. We now have the opportunity to make use of our robust socio-demographic mapping and forecasting insights. This insight will allow us to partner with expert organisations in the right locations, who can help ensure we effectively identify those households who need support and then work collaboratively to ensure that support is targeted and effective. Co-creating PSR support with our customers – for example, our Priority Watch engagement programme and ethnographic research running alongside our Assure Essential Saver affordability tariff trial, highlight the benefits of this type of engagement approach. This means it is important to take the learnings from this engagement and determine how best to scale this up across both our regions during AMP8. We will refocus our community engagement approach in a way that supports the delivery of our commitments aligned to the socio-demographic research we have undertaken. As well as using data and partnerships we are committed to the continuous improvement of this strategy, learning from when our service goes right and when it goes wrong. To support the ongoing development, we will use insight from customers, employees, stakeholders and regulators alongside the creation of our vulnerability panel. • Every week we will review key performance indicators at our operational hubs; • Every month we will report on progress made against our delivery plan (e.g. tracking metrics and measures of success) at our customer steering group; • Every quarter our vulnerability panel will scrutinise our approach and help develop our strategy to ensure effective delivery; and • Every year our executive team and board members will review the progress made against our vision and outcomes.	•We will ensure we assess our financial support and how this can be adapted dependent on upcoming decisions on a national single social tariff for water. • Invest in more meaningful customer journeys - Securing your water future, our business plan 2025 to 2030 details our ambition to invest in the service we offer through multiple channels. This investment will enhance our systems to give our customer-facing teams the tools they need to be able to resolve customer queries first time, all the time. This investment will also enhance our business-as-usual service and communication channel offering is accessible for as many customers as possible. • Complete a gap analysis against BSI standard •Continue to involve customers, partners, organisations and stakeholders in the co-creation of our services and this strategy as a whole • Implement an employee listening programme to generate ideas and support the continuous improvement of our strategy removing barriers to delivering good service.	The challenge will remain, for both SSC and the wider sector, about how it achieves the right balance between the number of customers we help pay their bills, and level of support offered, given customers' willingness to pay to fund social tariffs. If household finances are put under greater pressure and the single social tariff is not sufficient in providing the support needed, there is a risk that support may drop to fund bespoke social tariffs in a water company's supply region	By 2030, 80% of our partners are satisfied with the support we offer their end customers (to be re-baselined in 2028) By 2030, 80% of PSR customers are satisfied with the channels and solutions provided. % of our people who are proud of the service we deliver for vulnerable customers (metric target to be baselined in year 1).

No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
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. **Compliance : COMPLIANT**	The following will help to monitor the effectiveness of our services. •Point of contact surveys among PSR and wider customer base – including an improved approach to collecting insights following a loss of water supply where an incident team is formed. •Customer Promises Tracker, with PSR boosted sample to provide insights to support service proposition development and provide evidence to support awareness and customer satisfaction metrics outlined in our strategy. •Complete our 'Priority Watch' engagement programme with our H2Online Community and wider customers and stakeholders to help co-create our PSR services. •Complete our qualitative and quantitative behavioural research study running alongside our Assure Essential Save tariff trial. •Engage with our stakeholders and partners in our communities to listen to their views and capture the feedback to ensure we can pick up on themes and take appropriate action. We will feedback where we make changes through our stakeholder newsletters and other communication channels – e.g. MP and local councillor briefings. •Regular water and wider utility sector benchmarking reviews of PSR service and communication to help drive best practice. •Regularly scan the market for reports from third parties that can help us better understand our customers' needs and our changing population demographics – these can be fed into the PSR demographics tool developed for us by Sustainability First and Kelp. • Employee listening programme to support the continuous improvement of our strategy and remove barriers to delivering good service. • Detailed analysis of all insights including customer contacts, complaints, satisfaction levels. Looking ahead to 2026/27 in addition to all of the above we will relaunch an online and offline approach to co-creating services with customers, building on our Priority Watch approach undertaken in 2024/25 – this covered our H2Online Community and structured face-to-face conversations, for example at partnership community events and roadshows. We will also launch a mystery shopping programme to monitor how well we are delivering on the promise made in our strategy and inform action plans to improve and further enhance the service. This is proposed to include using an industry best practice customer journey framework to support the reviews (e.g. Seek, Do, Get)	• We will use all of the feedback data detailed here to learn from customer experiences, undertake deep dive root cause analysis of contacts from customers and create improvements.		•By 2030 80% of PSR customers are satisfied with the channels and solutions provided. •By 2030 80% of our partners are satisfied with the support we offer their end customers (to be re-baselined in 2028) % of our people who are proud of the service we deliver for vulnerable customers (metric target to be baselined in year 1).

No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
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. **Compliance : COMPLIANT**	Our teams are trained to spot signs of vulnerability and we will also roll out an extra care support approach with bespoke training to ensure customers' needs are accurately captured and the right level of support put in place. We commit to offering proactive communications delivered in a way that suits the customer and a wide range of ways for customers to contact and receive updates from us. Customers have flagged the need for solutions like 2-way texts to ensure a more personalised and pro-active level of support and this is something we have implemented during incidents. We are improving the accessibility of our website by partnering with Recite Me. This will provide our customers the ability to use our website in a way that is more suitable for them. We will continue to work with local community organisations and charities to co-develop and endorse more bespoke service offerings for customers (page 28-30) and liaised closely with them over our customer commitments and gained their endorsement. This will form part of a continuous improvement plan to ensure we do this for all PSR considerations, to ensure we provide a view of the customer voice with these particular characteristics. We have engaged with our community for various topics such as data validation of PSR, through our digital forum as well as face to face workshops, to make our PSR form easier to understand. This form has now been adopted by our business. Our customer and stakeholder insights will continue to inform our decision making - we have a wide-ranging business as usual customer and stakeholder engagement programme (see appendix VS1) which we intend to enhance during AMP8, alongside our socio-demographic mapping and forecasting and planned segmentation and behavioural research.	We will continue to use socio-demographic mapping, forecasting and research to highlight areas of customer inclusivity contact. •We will build upon our 'Extra Care team' and develop an approach for customers at most risk. •Where requested, and if possible, we will visit customers at a place where they feel comfortable to discuss their account and signpost places to go for additional support. •We will call customers and then contact them through their channel of choice (including by phone and SMS, during unplanned supply incidents and keep them updated (including through text) until the supply is fully restored, so they can plan accordingly.		• By 2030 80% of PSR customers are satisfied with the channels and solutions provided. . • By 2030, 80% or more of our 'Priority 1' PSR customers are satisfied with the service they received during and/or post an interruption to their water supply. •By 2030 80% of our partners are satisfied with the support we offer their end customers (to be re-baselined in 2028) % of our customers feel supported to pay (we will benchmark the target for this metric in year 1)
No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
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. **Compliance : COMPLIANT**	Our aim is that all our customers can access the water services they need, when they need it. Our mainstream services are as accessible as they can be for the largest number of people without the need for tailored support. We offer our customers a variety of contact channels, including: •phone; •email; •live chat; and •social media. Customers registered on our PSR can also access other services, such as: •home visits; •being able to nominate a family member, friend or carer to speak on their behalf; •a language line, for anyone unable to communicate in English; •our new British Sign Language (BSL) Interpreters Live signing service; and •bills and other communications in a range of different formats, including Braille, large print and audio CD.	• Customers on PSR will be asked to rate the service they have received. • Conduct deep dive of customers journeys incorporating a view of satisfaction through point of contact surveys • We will continue to seek feedback from community stakeholders and organisations to co create the services our customers expect, using their expertise to design services so they are meaningful and endorsed.		• By 2030 80% of PSR customers are satisfied with the channels and solutions provided. . • By 2030, 80% or more of our 'Priority 1' PSR customers are satisfied with the service they received during and/or post an interruption to their water supply.

No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
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. **Compliance : COMPLIANT**	Appendix VS1 'Customer and stakeholder engagement insights report' (June 2025) we describe in greater detail the scope of our ongoing engagement and research programme related to supporting our customers in vulnerable circumstances. It demonstrates how this strategy is informed by: •learning from our own business as usual engagement (BAU) and lessons learned e.g. following supply interruptions using point of contact satisfaction surveys, social media posts and complaints; •bespoke consumer research, such as a deep dive of the qualitative research on customer priorities focused on household consumer vulnerabilities, engaging with customers to co-create our new affordability tariff and a programme of 2-way deliberative engagement to help shape our PSR service. •feedback from our colleagues and stakeholders working on the frontline with customers with additional needs; •expert challenge from our Independent Challenge group (ICG), NGOs and charities such as Sustainability First; •third party research and learning including from other water companies, CCW, and Ofwat; and •a detailed vulnerability mapping and modelling to understand, the level, type, and distribution of different vulnerability needs in our two regions today and how that might change in the future up to 2040. Most of our bespoke engagement to inform this strategy covers our Cambridge and South Staffs regions to ensure representative feedback is gained in both. This is particularly important given the known differences in population demographics across our two regions. We follow Ofwat's and CCW's best practice guidance for high-quality research when carrying out our customer research. We will be attending the first Community Engagement Forum in July hosted by CCW, the aim is to share engagement practices. CCW are keen to create a forum to bring those working in this area together to highlight good practice, to share ideas, and help each other overcome any challenges.	•We will continue to engage with CCW and our other stakeholders about any notable changes to our work practices for customers who need additional support. •Continue to engage and work with co-creation partners to develop the support for customers needing additional support. These are often third sector organisations who work closely with residents in the community who have a diverse range of support needs. •We will use the Vulnerability Strategy as a continuous improvement tool, to monitor the development of our services. This will be scrutinised and reviewed by our vulnerability panel and wider sponsors. •We will attend CCW seminars and focus groups to share knowledge and learn best practice models. •Every year our executive team and board members will review the progress made against our vision and outcomes. •We will meet with our vulnerability panel quarterly to review our progress.	Resources to deliver the breadth of engagement at the pace required, if key colleagues were to leave the business for any reason. Balancing the needs to stakeholders and the level of ambition they expect water companies to achieve vs what water companies are funded for in their PR24 plans. Effective and transparent engagement and collaboration should off-set this risk.	To deliver actions driven from engagement agreed in a time frame agreed by our vulnerability panel

No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
3.1	Companies should take active steps to identify customers who require extra help who have not yet been identified. **Compliance : COMPLIANT**	We have made a significant investment in 2025 to better understand the socio-demographics of the populations we serve. This is to help inform our strategic approach to designing and targeting customer support for 2025-30 and longer-term. We now have the opportunity to make use of our robust socio-demographic mapping and forecasting insights. This insight will allow us to partner with expert organisations in the right locations, who can help ensure we effectively identify those households who need support and then work collaboratively to ensure that support is targeted and effective. The work we do with local organisations ranges from offering affordability support to providing training on partner referral mechanisms and our PSR. We also work with them to establish face-to-face relationships rather than rely solely on data transactions. We offer passport schemes which provides additional information including capturing PSR needs. Partnering with The Fuel bank Foundation means that we engage with customers who would not normally engage with us. Being able to issue fuel vouchers means that we can also discuss water related concerns and update any support the customer may need. We deliver training to our teams to ensure they have the skills and knowledge needed to support our customers. This primarily focuses on: • identifying that someone may benefit from support • the different types of support available for customers We are actively working with the rest of the industry to implement the energy DNO datashare in line with the WD0225 project.	•We will continue to passport customers for support services. •We will continue to work with organisations in the regions who are close to our customers' needs. •Use the toolkit to update our PSR forecasting model to update our socio-demographic insights on a annual basis.	Risk that data sharing projects do not deliver the outcomes expected	• In line with the OFWAT minimum standard - ensure that the number of customers on our PSR never falls below 15.9% of our customer base – area of development in line with KELP outputs. • Customer awareness of PSR is no less than 40% by 2030. The volume of: •stakeholders engaged annually • partners trained and actively referring • customers passported for support each year
No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
3.2	Companies should take steps to proactively increase customer awareness of the extra help available to those who need it. **Compliance : COMPLIANT**	Using the socio-demographic mapping and forecasting insights we will target our efforts in the areas where there is significant gaps. We will partner with expert organisations in the right locations, who can help ensure we effectively identify those households who need support and then work collaboratively to ensure that support is targeted and effective. We will continue to engage and work with our partner organisations to raise awareness of the support we offer. And specifically target groups and organisations where our data suggests a gap. We will use our vulnerability mapping and geo-spatial analysis of customers in debt to improve the targeting of our roadshows and face to face community outreach We will continue to monitor and re-focus our engagement strategy looking at PSR. Developing a better understanding of our role in supporting carers or those living in isolation and receiving fragmented care. We will retain our partnership with Fuel Bank Foundation, providing a unique channel for engagement. We will develop enhanced communication plans for campaigns to raise awareness of the support we can provide. This includes post incident communication to market PSR and the benefits of the scheme. We use annual billing periods as a time to proactively engage with customers in the community and promoting when a customer calls us, to maximise the opportunity for raising awareness.	• We will embark on data sharing with the DNO's. • We will continue to work with organisations in the regions who are close to our customers' needs, attend community events and host awareness sessions. • Use the toolkit to update our PSR forecasting model to update our socio-demographic insights on a annual basis. •Continue to use annual billing as a period of proactive contact, in the community and via contact centre We will continue to track that our plans are growing awareness of our PSR and financial support	Risk that data sharing projects do not deliver the outcomes expected Risk that customer need increases faster than expected and cannot be met based on current funding levels.	• Customer awareness of our PSR is no less than 40%, by 2030 • Customer awareness of affordability support is no less than 55% by 2030

No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
3.3	Companies should train their staff to spot potential requirements for extra help, even when a customer has not previously declared it. **Compliance : COMPLIANT**	We deliver training to our teams to ensure they have the skills and knowledge needed to support our customers. This primarily focuses on: • identifying that someone may benefit from support • the different types of support available for customers Our training is delivered in a variety of ways from classroom based to on the job coaching methods. We also make sure that we give our front-line teams the opportunity to experience situations firsthand. For example, by visiting our community hub and supporting customers face to face or by attending one of our community events. Our community team also take an active role in upskilling and sharing their expertise. We will complete a gap analysis against BSI standard (ISO 22458), providing a practical approach to our gaps in knowledge. Longer term we will explore how we set vulnerability within the context of human behaviour. We have started by identifying ten core behaviours on which we can build our support and inform the training programme for our people. We have taken these from a thematic review of our customer research, as well as those used across the water and energy sectors and from stakeholder feedback.	• Invest in our training programme and partner with training organisations that complement our target PSR growth areas. • Implement an employee listening programme to generate ideas and support the continuous improvement of our strategy removing barriers to delivering good service. •Further enhance our training programme in line with a behaviour model for customers who may need support. •Complete a gap analysis against BSI standard (ISO 22458)		• 100% of people with up-to-date training. • Volume of Mental Health First Aiders. • By 2030 80% of our workforce are Dementia friends - to align to forecasted customer growth in population with dementia to 39% by 2040. • % of our people who are proud of the service we deliver for vulnerable customers (metric target to be baselined in year 1).
No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
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. **Compliance : COMPLIANT**	We have an extensive network of community stakeholders with whom we collaborate and share information on services and insight.We also have a partner referral scheme made up of over 20 organisations. We deliver training on all of the support we offer our customers to the organisations we work with. They use our toolkit of support to fast-track customers to the most appropriate support. The work we do with these organisations ranges from offering affordability support to providing training on partner referral mechanisms and our PSR. We also work with them to establish face-to-face relationships rather than rely solely on data transactions. We have 'passport' and 'partner referral' schemes linked to terminal illnesses, discretionary housing payments, disabled grants, new tenancy sign ups and care leavers. We often attend events or joint home visits and ask for the providers' advice when looking at new areas of support. Partnering with the Fuel Bank Foundation across both of our regions has allowed us to access customers who may not necessarily come to us directly for help. Because of our wide community network, we get referrals from various organisations for people who they come across in crisis. This allows us to contact those customers directly and support them for matters concerning their water accounts. We are actively working with the rest of the industry to implement the energy DNO datashare in line with the WD0225 project.	• Explore the use of more 3rd party data to improve our knowledge of customers' needs. •Develop a proactive approach to supporting customers when a potential debt indicator is triggered. Implement a debt matching scheme to enhance the support available to customers. •Review our core customer journeys. Many customers are time poor and our business- as-usual and wider sector insights highlight that customers want a hassle free experience when they contact their water company. •Expand our data sharing plans and begin sharing data with energy DNO's in line with the WD0225 project. We already have 'passport' and 'partner referral' schemes linked to terminal illnesses, discretionary housing payments, disabled grants, new tenancy sign ups and care leavers.	Risk that data sharing projects do not deliver the outcomes expected	• In line with the OFWAT minimum standard - ensure that the number of customers on our PSR never falls below 15.9% of our customer base – area of development in line with KELP outputs.

No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
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. **Compliance : COMPLIANT**	We hold our Priority Services Register on our secure customer billing system. Each record shows the agent adding or amending the consideration for the customer. We record our PSR in line with PSR standards introduced by Ofwat 01/04/2025. We conducted a gap analysis of the information we hold against this standard. The considerations (PSR codes) are industry agreed codes with the water and energy sector, to assist in the smooth transition of data sharing. The PSR considerations/codes are aligned to health, communication support and security, along with dependency on water. The teams who can access and add or amend the codes are trained in this area and this forms part of the quality monitoring for agents. It is important that our teams are aware of the need to record codes accurately to ensure the customer receives the right service at the right time. Our teams receive regular GDPR mandatory training. PSR needs considerations/codes are only shared with people who need access in order to support the customer.	Every two years we will contact 90% of our PSR customers to validate the information we hold for them.	Balancing the need to contact a growing PSR register to check their details with the costs and resources available to do this will become increasingly challenging under current funding levels. We will work with stakeholders to find the most effective and efficient way to ensure our PSR is up to date.	Every two years we will contact 90% of our PSR customers to validate the information we hold for them. Of the 90% we attempt to contact we will make actual contact with 35% of them.
No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
4.2	Companies' records should be reviewed regularly to ensure they are up to date. **Compliance : COMPLIANT**	When a PSR customer contacts us we maximise the opportunity to ensure the customers needs are correct. Our billing system allows us to record the check with the customer. This forms part of the contact centre quality checking and training. Each year we establish which customers need to be contacted to confirm their PSR record is correct; this is refreshed regularly through contact campaigns. When we send out communication by email or text for a supply interruption, and the customer information is not delivered, we aim to contact that customer to ensure we how up to date communication information for them.	Every two years we will contact 90% of our PSR customers to validate the information we hold for them	With the guidance mandating water companies contact customers who have lifelong health conditions every 2 years, is a perceived waste of resources and an unnecessary effort burden to those customers. We are happy to work with Ofwat to address this sector wide concern.	Every two years we will contact 90% of our PSR customers to validate the information we hold for them. Of the 90% we attempt to contact we will make actual contact with 35% of them.
No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
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. **Compliance : COMPLIANT**	We have a partner referral scheme made up of over 20 organisations. We have 'passport' and 'partner referral' schemes linked to terminal illnesses, discretionary housing payments, disabled grants, new tenancy sign ups and care leavers. We are also actively working with the rest of the industry on the WD0225 project and the implementation of energy DNO data share.	Expand our data sharing plans and begin sharing data with energy DNO's in line with the WD0225 project. Continue with our community 'passport' and 'partner referral' schemes linked to terminal illnesses, discretionary housing payments, disabled grants, new tenancy sign ups and care leavers.	Two industry schemes WD0225 (WaterUK) and Northumbrian Water's Support for All project (OFWAT innovation funded). This creates mis-alignment and need a considered industry approach.	n/a

No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
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. **Compliance : COMPLIANT**	We have a comprehensive privacy policy on our website which outlines how we use, share, and store customer data. Alongside our plans to implement data sharing with Energy DNO's we will ensure we take on board our customers views around how we use their data. We will also work with the rest of the industry on lessons learned and reflect this in the define process.	Customers on PSR will be asked to rate the service they have received		• By 2030 80% of PSR customers are satisfied with the channels and solutions provided. . • By 2030, 80% or more of our 'Priority 1' PSR customers are satisfied with the service they received during and/or post an interruption to their water supply.
No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
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. **Compliance : COMPLIANT**	In 'Making water count', our business plan for 2020 to 2025, we committed to making sure we always provide the right level of support for our customers. We offered a range of support measures that recognised: · being visible, trusted and present in the local community is important; · customers should be able to use the communication channel, or combination of channels, that best suits their individual needs – including face-to-face conversations, phone calls, email, social media or apps; · help and support that is available is easily signposted and accessible; and · the use of technology should not stop us from delivering a personal service or make it harder for customers to deal with us. We are committed to making sure we always provide our customers with a tailored experience and a seamless service which is easy for them to use. We are also committed to providing a 'help when you need it' approach to vulnerability and a level of support. This is the cornerstone of our vulnerability strategy. Since we submitted our draft vulnerability strategy in June 2024, we have made a significant investment by embarking on a major socio-demographics mapping and forecasting project. This has given us our most robust picture of the level of consumer vulnerability within our two supply regions, and how this is likely to evolve up to 2040. While there is always uncertainty with future projections, which we have acknowledged, we are confident of using this insight to inform the decisions made in our strategy. We think it is important to make sure we are providing appropriate support to customers based on their needs. We also recognise that this should go beyond the remit of our current Priority Services Register (PSR). And we recognise that there can be overlaps between customers' needs and the help provided. For example, customers who need extra financial help could be negatively impacted by a poorly communicated message around debt. We do not consider it appropriate to develop a vulnerability strategy without reference to the role affordability plays in determining which of our customers are in circumstances that may make them vulnerable. Over the five years to 2030, we will build on the support we provide to customers in vulnerable circumstances, aligned to the four pillars of our vulnerability strategy: accessible, affordable, safety & peace of mind and engaged communities.	We are committed to the continuous improvement of this strategy, learning from when our service goes right and when it goes wrong. • We will continue to review our strategy aligned to Service for All guidance. • To support the ongoing development, we will use insight from customers, employees, stakeholders and regulators alongside the creation of our vulnerability panel.		• Every week we will review key performance indicators at our operational hubs; • Every month we will report on progress made against our delivery plan (e.g. tracking metrics and measures of success) at our customer steering group; • Every quarter our vulnerability panel will scrutinise our approach and help develop our strategy to ensure effective delivery; and • Every year our executive team and board members will review the progress made against our vision and outcomes.

No.	Minimum expectation	Implementation	Monitoring	Challenges	Targets/Outcomes
5.2	Companies should take steps to understand the likely underlying requirements for extra help in their areas. **Compliance : COMPLIANT**	Following our work with Kelp and Sustainability First we estimate that: • Up to 298,704 households (53.25%) in the South Staffs Water supply area, and 71,583 households (50.77%) in the Cambridge Water supply area are potentially eligible for registration on our PSR. • Overall, up to 370,287 households, which at 52.75% across our two supply regions are potentially eligible for registration on our PSR. This is comparable to Ofwat's estimated 52.74% of households across England and Wales. In addition to this view of our non-financial PSR need, the project also provided projected rates for absolute poverty to 2029/30 under two limited benefit policy scenarios: one assumes no change in policy, the other assumes three positive changes to benefits policy (in brief, scrapping the two-child benefit cap, uprating benefits in line with wage inflation and removing the freeze on Local Housing Allowance). Absolute poverty is defined as having an income below 60 per cent of the median income in 2010-11, adjusted for inflation - £15,180. • Under the pessimistic scenario, absolute poverty is projected to increase from 122,800 (22%) to 131,500 (23.5%) households by 2029/30 in the South Staffs Water supply area and from 19,800 (14%) to 21,900 households (15.5%) in the Cambridge Water supply area by 2029/30. • Under the optimistic scenario absolute poverty is projected to decline to 115,300 households (19%) in the South Staffs Water supply area while in the Cambridge Water supply area it will decline to 22,600 (16.5%) households. The outputs from the project highlight the level of PSR and financial support need and provide a robust base for decision making. Kelp has also provided us with a model to update the analysis as new datasets are released so that we can understand how the level of vulnerability changes over time and so update our strategy accordingly. The outputs of the project have also provided us with a set of heat maps that visualise the geographical distribution of key vulnerabilities at the LSOA level across our two water supply regions. Each map represents the estimated number of individuals, or households where datasets allow, with a specific vulnerability within each LSOA in a supply area. These maps will provide our teams with vital insights both to effectively target support into communities where there is an obvious high level of vulnerability for one or more PSR needs codes and also to understand how we can best support the make-up of PSR eligible households located in an area impacted by a loss of water supply caused by a burst mains. Having this data at our fingertips will help us to make the right decisions. We can also use it to inform investment decisions - e.g. prioritising improvements to assets in areas with highest levels of households at risk during supply interruptions. When combined, these datasets provide a rich picture of how population needs vary across the diverse communities we serve. For example, being able to layer households in need of financial support with their water bills with different PSR needs will also allow make it easier to identify areas where	• Learning from our own business as usual engagement (BAU) and lessons learned e.g. following supply interruptions using point of contact satisfaction surveys, social media posts and complaints; • Bespoke consumer research, such as a qualitative research deep dive on customer priorities • Focused on household consumer vulnerabilities, engaging with customers to co-create our new affordability tariff and a programme of 2-way deliberative engagement to help shape our PSR service. • Feedback from our colleagues and stakeholders working on the frontline with customers with additional needs; • Expert challenge from our Independent Challenge group (ICG), NGOs and charities such as Sustainability First; • Third party research and learning including from other water companies, CCW, and Ofwat; and • a detailed vulnerability mapping and modelling to understand, the level, type, and distribution of different vulnerability needs in our two regions today and how that might change in the future up to 2040. • Prioritising households at the greatest risk of harm: we detail below a matrix approach to assessing how we can segment our household customer base to offer tailored support based on the level of financial and non-financial vulnerability and also considering the level of harm that might occur during a period where the water supply is cut-off for an extended period; and • Targeting our efforts where the need is greatest: this means focusing our efforts on closing the gaps for the PSR needs codes that are most prevalent in the population we serve and where		• In line with the OFWAT minimum standard - ensure that the number of customers on our PSR never falls below 15.9% of our customer base – area of development in line with KELP outputs.

| | | households have the most complex life situations and are at greatest risk of harm. Also, conversely, investment in support can deliver the biggest benefit.

From Summer 2025, we will focus on how we can best operationalise the demographic datasets and visualisations, making sure that the overlapping of multiple vulnerability indicators or socio-economic circumstances will not lead to an amplifying effect of individual factors and of the overall vulnerability level. We will also explore how we can partner with other industry initiatives dedicated to providing socio-demographic data to provide an even more in-depth view of our customer base.
We are mindful that these insights are potentially valuable to organisations and local authorities in our area that work with and support customers on low incomes and additional needs. We will explore how we can best socialise this insight in the spirit of open data to maximise public benefit. | the gap between the number of households who are currently on our PSR for that needs codes is largest, when considering the level of need in the population

• During 2025/26, we are committed to commissioning in-depth consumer research to better understand the needs within each of the six identified segments. For example, to better understand:

· the behavioral traits of households and what support and services would work best for them based on their situation;
· what resources and training we need for our teams to enable them to deliver the service and support each segment needs; and
· what methods of communication are needed to raise awareness and encourage uptake of the support on offer. | | |