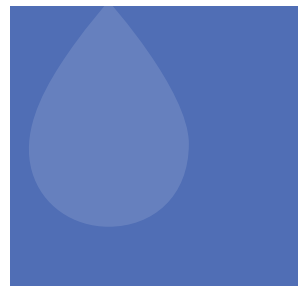




Cambridge Water



South Staffs Water



South Staffordshire Water PLC  
Help when you need it - our  
draft vulnerability strategy

# Contents

## About this document

In December 2023, Ofwat published 'Service for all', its final vulnerability guidance for water companies supporting customers who need extra help.

In response to Ofwat's guidance, this document sets out our draft strategy for how we intend to support customers in vulnerable circumstances.

For the purposes of this document, we have used Ofwat's definition of vulnerability, as follows.

"A customer who, due to personal characteristics, their overall life situation or due to broader market and economic factors, is not having reasonable opportunity to access and receive an inclusive service, which may have a detrimental impact on their health, wellbeing or finances."

We will continue to develop our strategy over the next year, with a view to having the final strategy in place for the start of the next five-year planning period from 2025 to 2030. We will also regularly review our approach.

### Registered Office:

Green Lane  
Walsall  
West Midlands  
WS2 7PD

Registered in England and Wales,  
number 02662742.



About South Staffordshire Water	2
Our vision, purpose and values	3
Managing Director's welcome	4
Executive summary	5
Introduction	8
Setting the context for our strategy	10
Developing our strategy	15
Our draft vulnerability strategy	18
Meeting Ofwat's objectives	21
Bringing our strategy to life – next steps	24

# About South Staffordshire Water

We operate  
Cambridge Water  
and South Staffs  
Water



We are part of the South  
Staffordshire Plc group of  
companies

We are a water only  
company, and do  
not take away and  
treat waste water



We are regulated  
by Ofwat, the  
Environment  
Agency and the  
Drinking Water  
Inspectorate



We have been a successful,  
privately-run business for  
170 years. We have never  
been in public ownership



We provide clean  
water to more  
than 1.7 million  
people and  
42,000 businesses  
every day



# Our vision, purpose and values

## Our vision

To deliver clean, affordable water every day



## Our mission

To make sure:

- all our customers have access to high-quality and affordable drinking water every day; and
- we always empower our people to provide an excellent and trusted service.

## Our purpose

Over the past 170 years, we have provided high-quality water supplies to customers in our Cambridge and South Staffs regions. So that we can keep providing this essential public service, we:

- put customers' needs at the heart of all our decision making;
- actively work in partnership with local communities;
- act as the guardians of our assets, building resilience with regular investment;
- work hard to protect and enhance the natural environment; and
- run an efficient business, in everyone's interests.

This is how we are **securing the water future – for our customers, our communities, the environment and our people.**



## Our values

Our mission and purpose are underpinned by our values.

- Professional
- Trusted
- Impactful
- Community focused

These values are reflected in our people's objectives and the work they do.



# Managing Director's welcome



**Welcome to 'Help when you need it', South Staffordshire Water PLC's draft vulnerability strategy. It presents our approach to supporting customers across our Cambridge and South Staffs regions who, for whatever reason, may find themselves in vulnerable circumstances. It also forms part of our wider customer strategy designed to ensure we always deliver excellent service for all our customers.**

We're committed to making sure we always provide our customers with a seamless service that has been tailored to their specific needs. Our aim is to deliver our long-term ambitions to customers in the communities we serve.

This means exceeding customers' expectations and making sure help is always available when they need it. It also means lifting our communities and helping the people within them to work and thrive. We think this draft strategy will help us to deliver these ambitions.

The overarching theme for this draft strategy is about understanding our customers' ability to cope. Key to this is recognising that vulnerability can be transient and that any customer can move in and out of positions of vulnerability depending on their circumstances at a particular point in time. So, it's important that we make sure our vulnerability strategy is adaptable and can flex to better suit customers' individual circumstances.

In developing this draft strategy, we've taken into account the new Condition G of our licence, which covers customer

service. We've also taken the five objectives set out in Ofwat's 'Service for all' vulnerability guidance into consideration. This draft strategy demonstrates how we're meeting both the new licence condition and the regulator's vulnerability objectives.

This draft strategy represents our current thinking. I hope you enjoy reading it. We'll continue working with partners and stakeholders over the next 12 months to shape our final strategy, which we'll publish in June 2025. We look forward to working with you in the coming months.

A handwritten signature in dark ink, appearing to read 'Andy Willcott'.

Andy Willcott  
Managing Director

## Executive summary



**As one of the smaller water companies in the England and Wales water sector, we pride ourselves on being embedded at the heart of the communities we serve. Reinforcing this strong local focus is our commitment to delivering services that are important to our customers. This includes those who may be in vulnerable circumstances or who may be struggling to afford their water bills.**

We welcome Ofwat’s [‘Service for all’](#) guidance, with its five objectives for customer service and support, and its ‘inclusive by design’ approach to developing services for those who need extra help.

We already offer a range of support measures that recognise our customers as individuals. This means tailoring support to their specific circumstances. In addition, we make sure we provide the communication channel, or combination of channels, that best suits customers’ particular needs – face-to-face conversations, phone calls, email, social media or apps. And we provide support that is easy to access.

But we want to go further. As well as committing to making sure we always provide our customers with a tailored experience and a seamless service, we are also committed to providing a ‘help

when you need it’ approach to vulnerability. And to providing a level of support for customers that goes wider than water. This is the cornerstone of our vulnerability strategy.

In this document, we describe the considerations and principles that underpin our strategy, and how it meets Ofwat’s ‘Service for all objectives’. It should be stressed that this document represents our current view – and that there are some areas where we need to develop our ideas. We will continue to test our thinking over the next 12 months, consulting and engaging with stakeholders as we develop our final vulnerability strategy.

We are mindful that to deliver an effective strategy, we need to identify our key measures of success. These need to be underpinned by our customer engagement, which defines what is most

important to them. This will be a core part of our implementation programme over the coming months.

At the heart of our strategy are a number of business considerations. Key among these is that vulnerability and affordability should be considered in tandem. By doing this, we avoid duplication of effort while also recognising that not all customers will struggle with both. Another consideration is the need to align this strategy with the commitments set out in [‘Securing your water future’](#) our business plan for 2025 to 2030. This is to ensure we target meaningful help and support to customers based on a number of circumstances, including their ability to cope.

Alongside these considerations, we have also developed an approach built on the principles of appropriateness, accessibility and affordability. This is to ensure we always have our customers’ interests at

the heart of all our decision-making, and that while we are meeting Ofwat’s

objectives for those who may find themselves in positions of vulnerability,

we are also doing the right thing for them.

## Our draft vulnerability strategy

Building on core **customer strategy** principles and delivery to enhance approach to ensure inclusivity of activity

Delivering a service and support that is inclusive of the different needs of our customers delivering positive customer outcomes, now and ongoing;

### Appropriate

Ensuring our activity and communications recognises the different circumstances and challenges of customer groups taking needs into consideration and tailoring our end-to-end policy and services to support these in the right way

### Accessible

Providing suitable channels and support options to allow customers with additional needs to be able to access, manage and utilise all aspects of their water service

### Affordable

Providing practical advice, support and interventions that helps all customers to more effectively manage and pay for their water use to help prevent recover from water debt wherever possible

## Meeting Ofwat’s objectives

For the purposes of this draft strategy, we describe how we are compliant with Ofwat’s objectives. We will continue to build on this work as we develop our strategy in the coming months. We summarise the main points below.

### High standard of service and support

Because of the work we have carried out in recent years, we already have a strong foundation in this space and make a wide range of service offerings available. This includes making sure we support the individual needs of customers during a major incident, such as a mains burst. It also includes learning from our customer insight and debrief sessions after an incident to drive a culture of continuous improvement across the business.

Looking ahead, through our ‘Help when you need it’ programme we will develop personal assistance plans for customers who need extra support. We will also create specialist training packages for our people across a range of vulnerability challenges.

### Inclusive by design

We are proud of the extensive relationships we already have with community groups and subject matter experts across our Cambridge and South Staffs regions who help inform the services we provide to customers. We will continue to work with the consumer watchdog CCW to develop our approach.

To ensure we effectively deliver our strategy, we will keep our services and our communications under review so that they are always inclusive by design. We will also build on our existing relationships and collaborate to demonstrate how our approach has been endorsed and our ambitions are supported.

### Identifying customers

It is important for us to have an approach in place that recognises all forms of vulnerability, including for those customers who may not identify it for themselves. We already have partner referral or passport schemes in place to support our customers. In addition, we use a range of internal and external data sources to help us prioritise our activities on key areas of focus.

We also know that it is important for us to continue building this dataset, so it accurately reflects all forms of vulnerability

And we recognise that to fully meet this objective, we need a scalable and secure approach to data sharing. So, we will implement a data sharing approach with distribution network operators from the energy sector to identify new opportunities for engagement and co-operation.

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## Recording needs

We already have an effective strategy in place for recording and processing the data of customers on our Priority Services Register (PSR).

Looking ahead, we will use data analysis to develop and deliver different service offerings. We will spatially combine external data sources with our existing data to drive efficient decision making. This has an important role in helping us to determine if certain groups of customers need more targeted help.

Alongside this, we will also continue to meet Ofwat's requirements for data validation and verification. In addition, we will continue to build on our customer segmentation analysis to drive bespoke vulnerability support.

And we will work with stakeholders and consumer advocates, across the range of vulnerabilities experienced, to understand the needs of customers from our traditionally harder-to-engage or seldom heard communities. We recognise the role wider stakeholder engagement can play in driving greater value and enhanced outcomes for customers – and how this

complements our comprehensive customer insight programmes.

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## Vulnerability strategies

We are putting in place a delivery plan to support this draft vulnerability strategy. This is so we can be sure our final strategy is robust, well-tested, well evidenced and delivered to programme.

Key to this is our commitment to keep the strategy under review and make sure it is flexible enough to adapt to changing circumstances.



# Introduction



**At South Staffordshire Water, we have a long history of delivering clean water services to customers across two socially and geographically diverse operating areas. Our vision as a business is to deliver clean, affordable water to customers across our Cambridge and South Staffs regions every day.**

We think it is essential that all our customers trust us to do this in the most effective and efficient way. As one of the smaller companies in the England and Wales water sector, we have a strong local focus. This means we are embedded at the heart of the communities we serve. Because of this, we always strive to deliver the services that are important to all our customers. This includes those who may be in vulnerable circumstances or who may be struggling to afford their water bills.

We welcome Ofwat's [‘Service for all’](#) guidance. And for the purpose of this draft strategy, we are using its definition of vulnerability, which is as follows.

**“A customer who, due to personal characteristics, their overall life situation or due to broader market or economic factors, is not having reasonable opportunity to access and receive an**

**inclusive service, which may have a detrimental impact on their health, wellbeing or finances.”**

Within this draft strategy, we describe how we will deliver the objectives set out in Ofwat's guidance.

## Making water count – our current approach

In [‘Making water count’](#), our business plan for the five years from 2020 to 2025, we committed to making sure we always provide the right level of support for our customers. This is set within the context of the current cost-of-living crisis and the wider context of rising consumer debt within society.

We are acutely aware of the impact of these and other pressures on household incomes and our customers' ability to

cope. So, we already offer a range of support measures that recognise that:

- being visible, trusted and present in the local community is important;
- each customer is an individual, which means tailoring support to their specific circumstances;
- customers should be able to use the communication channel, or combination of channels, that best suits their individual needs – 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.

Key to this is recognising that vulnerability can be the result of a number of permanent or temporary factors, such as:

- financial problems;
- mental health problems;
- physical disability;
- illness;
- language or literacy barriers; or
- short-term or temporary life events – for example, bereavement, divorce or redundancy.

It also means recognising that people can move in and out of positions of vulnerability, and tailoring the support we make available appropriately.

In recent years we have transformed our approach to how we deal with customers who may find themselves in vulnerable circumstances. This includes building effective relationships with many local community organisations across our Cambridge and South Staffs regions. This has enabled us to take a more rounded and holistic approach to how we identify, help and support all our vulnerable customers.

## Securing your water future – our approach to 2030 and beyond

Looking ahead, we are committed to making sure we always provide our customers with a tailored experience and a seamless service. We are also committed to providing a ‘help when you need it’ approach to vulnerability and a level of support that goes wider than water. This is the cornerstone of our vulnerability strategy.

In ‘[Securing your water future](#)’, our business plan for 2025 to 2030, we reinforced our commitment to keeping the bills our customers pay affordable – they are currently one of the lowest in the England and Wales water sector. We also committed to making sure we really understand the challenges our customers are facing. This includes aligning our approach to affordability with the

consumer watchdog CCW’s [affordability review](#), making sure we have addressed each of its recommendations within our approach.

We think it is important to make sure we are providing our full support to customers. We also recognise that this should go beyond the remit of our 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.

So, over the five years to 2030, we will build on the support we provide to customers in vulnerable circumstances, aligned to the following three pillars of our vulnerability strategy.

### Understand, educate and capture needs

We will:

- provide a full training programme and toolkit for all our customer-facing people;
- explore data sharing approaches with other organisations;
- carry out a full review of our customer base and needs; and
- carry out a full review of our customer service activity.

We will also test our communication approaches with our H2Online communities in our Cambridge and South Staffs regions. We have already started this by convening a group of customers to have an ongoing dialogue with. We also intend to hold community sessions alongside the online forum conversations. We will trial this approach over the next year.

And we will work with stakeholders and consumer advocates, across the range of vulnerabilities experienced, to understand the needs of customers from our

traditionally harder-to-engage or seldom heard communities. We recognise the role wider stakeholder engagement can play in driving greater value and enhanced outcomes for customers – and how this complements our comprehensive customer insight programmes.

### Inclusive customer journeys and support options

We will:

- adapt our communication channels to better support customers’ needs;
- review key customer journeys;
- appoint trusted third parties to carry out a review of our communication channels; and
- prioritise service response and protection for customers in vulnerable circumstances.

### Extend support beyond water

We will:

- make sure our policies are aligned with those of key referral partners; and
- continue to develop our outreach programmes, and in-home support and advice.

We also want to make sure all our people understand the spectrum of vulnerability and how best to support those customers who need extra help.

So, we will focus our attention on a programme of training and continuous improvement. The aim is to develop an approach to vulnerability that reaches all parts of the business, transforming the service we provide as a result.

In the following chapters, we describe how this will inform our strategy and how we will meet Ofwat’s objectives for customers in vulnerable circumstances.

# Setting the context for our strategy



**Underpinning our strategy are a number of key business objectives. This includes taking a customer-centric approach by creating meaningful customer journeys and making sure we always offer great service through multiple channels. It also means making sure our customers can choose the best journey for their individual circumstances at any given time.**

So, our aim is to make it easy for customers to access our services and for us to effectively support those in circumstances that could make them vulnerable, even if they do not consider themselves to be so. This means taking a more rounded and holistic approach to affordability and vulnerability. And it means making sure all our people feel connected to our customers, reinforcing our commitment to always provide the best service.

In developing our strategy, we have taken a number of considerations around vulnerability into account. This includes:

- a growing and ageing population;
- the health of that population;
- addressing the needs of those living alone and in rural communities and;
- accessibility and communication;
- deprivation levels; and
- employment levels.

Below, we discuss how these considerations have influenced our thinking. In section 4.2 of our [supporting insight report](#), we go into more detail on the main demographic trends in our Cambridge and South Staffs regions that highlight which households will most need our support.

## A growing and ageing population

One of the key challenges we face as a business is population growth. In our Cambridge region, the population is expected to grow from 340,000 in 2020/21 to 483,130 in 2049/50 – an increase of just over 42%. We expect growth in our significantly larger South Staffs region to be slower, rising from 1,385,700 to 1,586,000 over the same time frame – an increase of 14.5%<sup>1</sup>. Across both our regions, this means there will be an additional 305,000 people to serve.

<sup>1</sup> Cambridge Water and South Staffs water draft water resources management plans 2024.

At the same time, data suggests that 31% of the population in our South Staffs region is over the age of 55, which is in line with the national average. In contrast, our Cambridge region has a much younger population demographic<sup>2</sup>.

Linked to this, 2021 Census data from the Office for National Statistics (ONS) shows that 10.4% of people in Dudley and Walsall in our South Staffs region, and 7.6% of people in Cambridge are in unpaid care roles<sup>3</sup>. We expect these percentages to increase as the population ages.

This highlights the challenges we are likely to face around providing support for those with ill health and other age-related problems. This includes the training that will be needed to help our people support an ageing population and the information we will need to provide to help customers effectively manage their bills and water use.

## Population health

### Kidney disease

Data from the NHS shows that around 73,000 people in our Cambridge region and 204,000 people in our South Staffs region are living with kidney disease<sup>4</sup>. This is higher than the national average and is a specific area of focus for us.

In addition, we think we currently have around 325 people in our Cambridge region and 900 people in our South Staffs region who require regular dialysis. These numbers could potentially reach 1,500 and 4,000, respectively by 2033.

This highlights the need for us to develop referral pathways for customers with NHS dialysis clinics across our Cambridge and South Staffs regions. It also highlights the need for us to develop our expertise in this area to help us fill the gaps in our data and ensure we can support any affected customers.

<sup>2</sup> Office for National Statistics.

<sup>3</sup> Office for National Statistics: 2021, census data

<sup>4</sup> NHS statistics, compiled by Kidney Research UK

### Cancer rates

The risk of developing cancer increases with age. Research from cancer support charity Macmillan suggests that 1 in 2 people born in the UK after 1960 will receive a cancer diagnosis<sup>5</sup> during their lifetime.

This could have huge implications for us, as living with cancer can put enormous strain on people's mental health, and their ability to cope and manage everyday interactions. It can also make managing household bills more complicated, as spending time in hospital can make it difficult to ensure payments are made.

So, this means making sure we have appropriate support in place to support these customers and their families. This includes making things like flexible payment plans or personalised support plans available, for example, based on customers' changing needs over time. But it also includes showing leadership in developing standardised approaches that could be adopted across the wider utilities sector.

### Disability

We use the Equality Act 2010 definition of disability as someone whose day-to-day activities are limited because of their circumstances. ONS census data shows that the proportion of people with disabilities in England to be 17.7%<sup>6</sup>. Our own data suggests that levels of disability are lower than this in our Cambridge region, but across our South Staffs region there are areas where this figure is as high as 20%.

When levels of disability are combined with an ageing population, this will likely lead to an increase in the number of customers who will need to be registered on our PSR and require additional support from us. To mitigate this, it is essential for us to create customer journeys that are easy to understand and complete. And

<sup>5</sup> Macmillan Cancer Support

<sup>6</sup> Office for National Statistics: 2021, census data

<sup>7</sup> Alzheimer's Research UK

<sup>8</sup> NHS health

that we provide information in a straightforward and accessible way.

### Dementia and mental health

Current UK statistics suggests that 1 in 11 people over the age of 65 are living with dementia<sup>7</sup>. This is expected to increase as the population ages. Across our Cambridge and South Staffs regions, dementia rates range from 0.91% to 1.6%, against a national average of 1%.

At the same time, data from the NHS shows that nearly 17% of people aged 16 and above are living with a mental health condition<sup>8</sup>. Across South Cambridgeshire, the equivalent figure is 12%, while in Sandwell in our South Staffs region the figure is much higher, at 21.5%.

Among other things, this highlights the need for us to put in place clear policies around power of attorney, for example. It also highlights the importance of the partnerships we create with other organisation to ensure we make the best possible support available to customers.

### Those living alone and in rural isolation

We have a number of rural communities across our Cambridge and South Staffs regions. For example, South Cambridgeshire and Huntingdonshire are highly rural, with at least 80% of the population living in rural settlements and hub towns. This can make it difficult for us to target support effectively to customers in vulnerable circumstances during a major incident, for example.

In addition, ONS census data shows that almost 1 in 3 people live by themselves<sup>9</sup> – a figure that is echoed across our Cambridge and South Staffs regions. Across the country, it is estimated that 600,000 people have no one to call for help if they need it. This figure is expected to rise to 900,000 by 2039<sup>10</sup>.

<sup>9</sup> Office for National Statistics: 2021, census data

<sup>10</sup> Community Led Homes s report

As part of our long-term vulnerability strategy, we will define an approach to supporting customers living in rural areas or in single-person households to ensure they have access to the help and support they need, when they need it.

## Accessibility and communication

### Literacy and language

Although the literacy rate across the UK is very high – at 99% – there are still a number of people who struggle to read and write. The average reading age among adults in the UK is nine years old. In addition, ONS census data shows that 16% of households in our Cambridge region do not speak English as their first language, against a national average of 12%; the equivalent figure in our South Staffs region is 11%<sup>11</sup>.

To ensure we continue to provide the appropriate levels of support to all our customers, it is important to recognise the need for clear communication using straightforward language. We will also use the learnings from our innovative water efficiency in faith and diverse communities project to help us build meaningful relationships with the traditionally harder-to-engage and seldom heard communities across our Cambridge and South Staffs regions.

### Digital deprivation

We use Eurostat territorial units for statistics (NUTS) data as an indicator of digital deprivation across our Cambridge and South Staffs regions. But it should be noted the geographies associated with these statistics may not precisely match the boundaries of our two operating areas.

The statistics suggest that digital deprivation in our Cambridge region stands at around 7% – the same level as the rest of England. But it is higher in many parts of our South Staffs region,

reaching 15% in the Sandwell NUTS geographic area<sup>12</sup>.

The Digital Exclusion Risk Index (DERI) scores also aligns to the NUTS statistics. It shows that our Cambridge region has more localised patches of digital deprivation compared with our South Staffs region, where it is more widespread in our deprived urban communities.

This variation tells us it is likely that we will have to adopt targeted approaches to ensure customers are aware of the support we have available and that it is easy to access. Key to this is the multi-channel approach we are already taking to communicating and engaging with customers, using a variety of traditional and digital means to reach them all.

Also important is how we use our data to better understand the ‘hotspot’ areas of digitally excluded customers. This will help us to engage face-to-face more in these areas to provide personal support. And it will help us to tailor our partnerships to maximise our reach and impact through interactions with local community groups and organisations.

### Deprivation levels

Deprivation data taken from the 2019 Index of Multiple Deprivation shows that 32% of all households in our South Staffs region are in the most deprived deciles (1 and 2). In addition, Dudley, Sandwell and Walsall have significantly higher deprivation levels compared with the rest of England. This is in sharp contrast with our Cambridge region, where just 1% fall into the same deciles, while 72% fall into the more affluent deciles (7 to 10)<sup>13</sup>.

Our own research data suggests that almost half of account holders in our South Staffs region live in households with an income of less than £25,000 a year, while the ONS census data puts gross annual income in our Cambridge region at £34,766<sup>14</sup>. This highlights the

difference in earning power across the two regions.

In addition, analysis by CEPA of water poverty based on existing social tariff interventions shows that more than 13% of households in our South Staffs region are in water poverty when using the 3% bill to income ratio, and that this is forecast to increase to more than 19% by 2027/28<sup>15</sup>.

Linked to this, the Joseph Roundtree Foundation (JRF)<sup>16</sup> states the income needed to reach an acceptable standard of living. In 2023, a single person needed to earn £29,500 a year to reach a minimum acceptable standard of living, while a couple with two children needed to earn £50,000 between them.

The JRF also reports that poverty levels in 2024 have returned to pre-pandemic levels, but this is because of incomes rising for middle-income households. This points to a growing inequality and increase in working poor, more unstable incomes and a steady growth in people with negative budgets, mainly caused by increases to household bills outstripping income growth. This changes the types of support that will be needed if our vulnerability strategy is to have a positive impact.

Because of the levels of income deprivation we see among our South Staffs customers in particular, we recognise the importance of taking an ‘in the round’ approach to tackling vulnerability. This means 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 circumstance that may make them vulnerable.

So, a key component of our vulnerability strategy is the robust and targeted approach we are taking to tackling affordability and the work we are doing to help customers stay on track with paying their water bills. This includes our customer segmentation work, which is

<sup>11</sup> [Office for National Statistics: 2021, census data](#)

<sup>12</sup> [Eurostat’s NUTS \(Nomenclature of territorial units for statistics\)](#)

<sup>13</sup> [Index of Multiple Deprivation \(IMD\), 2019](#)

<sup>14</sup> [Office for National Statistics: 2021, census data](#)

<sup>15</sup> [CEPA water poverty report – PR24 report for SSC](#)

<sup>16</sup> [Joseph Roundtree Foundation \(JRF\) Minimum Income Standard \(MIS\)](#)

helping us to provide targeted support based on individual customers' circumstances. And it includes our work with partners in the debt sector to ensure water debt is treated as a priority debt.

## Employment levels

The ability of people to access employment opportunities is another area of vulnerability we have considered in developing our strategy. According to data from the ONS, the level of economic inactivity in the UK stood at nearly 22% between November 2023 and January 2024. This is marginally higher than the same period in the previous year. There are currently 9.2 million people in the UK aged between 16 and 64 who are not in work or actively looking for employment<sup>17</sup>.

At a more granular level, data from the ONS labour force survey shows that our Cambridge region and large parts of our South Staffs region have higher levels of employment than the average for England as a whole. But employment levels are lower in Walsall and Sandwell. And economic inactivity levels in Sandwell are significantly higher than in the rest of England<sup>18</sup>.

These trends highlight the clear need for us to provide accessible, easy to understand communications to help customers access information about their bills and the support we have available to help them. And it emphasises the need for us to consider affordability as a key component of our vulnerability strategy.

In our supporting insight report, we also draw attention to other trends, including:

- postal deprivation and the impact this can have on people missing out on services or managing their bills;
- the impact of the planned switch-over to internet-based phone services on people who rely on telecare services in an emergency; and
- the impact of climate change – in particular, how the forecasted increase in heat waves will affect

vulnerable groups of customers in our populations.

## Listening to our customer and stakeholder voices

Our extensive customer research has supported the development of this draft vulnerability strategy. In developing our thinking, we have taken care to draw on a wide range of customer insights.

We set out more detail on our customer research programme and the line of sight between customer insight and our support plans in our supporting insight report. These insights sources include the following.

- As part of our approach for customer engagement when **developing our latest business plan**, we have listened to thousands more customers through their daily interactions with our teams. This also includes customer satisfaction survey feedback each year with around 1,900 customers who are signed up for our financial or PSR support.
- We carried out a review of **wider water sector research** relating to the PSR while developing our business plan. This includes research studies commissioned by Ofwat and CCW.
- We carried out a review of **best practice** across the wider utility and financial services sectors covering their approaches for providing support for customers who need extra help.
- We delivered a **step change in the engagement** carried out for our latest business plan, resulting in our most in-depth and wide-ranging research programme. The aim was to help us fully understand the services our diverse population of customers and stakeholders expect us to deliver now and in the future. This included carrying out robust research to underline the

development of our financial support package from 2024/25.

In particular, our supporting insight report focuses on the following key areas when considering customers who need extra support.

- The **expectations for the service and support** they receive from us in different situations. This could include a period where their water supply is cut off, where planned maintenance work is being carried out in their local area, or when they are making a routine contact about their water bill or the support we have available.
- How they rate our **ability to deliver services**. Specifically, what works well and what we need to improve to make sure our services meet their needs when they contact us.
- How their **priorities and needs differ** from the wider household customer base.

Our research suggests there are three main risk factors that our vulnerability strategy will need to address. We outline these below.

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## Demographics

This risk factor relates to the societal factors that impact customers' day-to-day wellbeing, with impacts touching all parts of their lives. An ageing population, higher rates of disability and chronic illness, and the growth of single-person households can all impact customers' ability to cope. This can affect how they engage with our services. Examples include:

- being trapped in a cycle of poverty;
- not speaking English as a first language; or
- a lack of educational opportunities.

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## Ability to interact with or access services

This risk factor focuses on the barriers customers may face in engaging with our

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<sup>17</sup> Office for National Statistics, labour Force data set

<sup>18</sup> Office for National Statistics, labour Force data set

services. This includes their willingness to engage and their ability to understand and use technology, such as the latest generation of water meters that allow regular meter readings to be taken.

This risk can be further compounded by the increasing complexity of information and the interactions needed to get the most out of the services available.

Examples include:

- a physical inability to interact with smart devices;
- not being able to understand complex information around tariff options; and
- being unable to have a water meter installed because of the location of pipework in a property.

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## Personal situation

This risk factor includes short- and long-term health conditions, as well as specific life events that could make a customer less able to interact with us and manage their water services. This could lead to unexpected harm. Examples include:

- physical and mental health conditions or disabilities;
- recovering from hospital treatment;
- bereavement; and

- loss of income.

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## Region-specific risks

We have two very different populations to support across our Cambridge and South Staffs regions. Understanding the specific risk factors for each region is vital for informing our vulnerability strategy.

We summarise these region-specific risk factors below.

### Cambridge region

Our Cambridge region has:

- a higher proportion of households where English is not spoken as the first language;
- a faster growing population, which may increase the level of PSR support required over the long term; and
- higher levels of affluence and a younger population profile.

### South Staffs region

Our South Staffs region has:

- higher levels of income deprivation and water poverty, particularly in the urban communities of Dudley, Smethwick and Walsall;

- higher levels of digital deprivation, particularly in less affluent communities; and
- an older population, more at risk of ill-health and from having a disability. Linked to this risk profile is a higher proportion of unpaid carers.

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## Engagement with expert stakeholders

Alongside our customer engagement programme, we also have regular dialogue with a wide range of expert stakeholders and community representatives. In chapter 3 of our supporting insight report, we provide examples of the types of feedback we have received from various stakeholders, representing a range of organisations. We also describe how we have used this insight to shape and improve our PSR and financial support.

In addition, we have compared our customer and stakeholder feedback. We have found there are no significant differences in the main points raised about expectations of what great PSR support looks like and how our current services can be improved. This is encouraging when making decisions as there are no major conflicts between the two groups.

# Developing our strategy



**In developing our draft vulnerability strategy, we have rebased our approach and goals for supporting vulnerable groups. This is to ensure we take a whole business view of how we tackle vulnerability, delivering a strategy that underpins our wider business objectives.**

## Considerations underpinning our strategy

At the heart of our vulnerability strategy are the following business considerations.

- Vulnerability should be seen as an **extension of our core customer delivery strategy**. It should be aligned with our business plan for 2025 to 2030 and with our ongoing principles of service inclusion.
- **Vulnerability and affordability should be considered in tandem**, to avoid duplication or confusion. At the same time, we should recognise that not all customers will struggle with both.

- **Aligning the internal and external costs and benefits** of providing assistance to vulnerable groups can support our rationale for investing in better support and targeted help going forward.

We have considered widening the remit of customers in vulnerable circumstances to include:

- those facing financial hardship, giving them more resilience to pay their bills;
- those with additional support needs provided through our PSR; and
- those who need to use high volumes of water because of medical or other reasons.

We think this will help us to target meaningful help and support to customers based on a number of circumstances, including their ability to cope.

## Principles underpinning our strategy

We will build on our overarching customer strategy principles and deliver an enhanced approach to vulnerability that ensures inclusive activity.

This means delivering service and support mechanisms that are inclusive of customers' different needs and that provide positive outcomes. It also means implementing an approach that has the following principles at its heart.



- **Principle 1: appropriate.** We will make sure our activity and our communications recognise the different circumstances and challenges of our customer groups. We will take their needs into consideration and tailor our end-to-end policy and services appropriately and in the right way.
- **Principle 2: accessible.** We will provide suitable channels and support options to allow customers with additional needs to be able to access, manage and utilise all aspects of their water service.
- **Principle 3: affordable.** We will provide practical advice, support and interventions that help all customers to manage and pay for their water use more effectively. We will use the tools at our disposal to prevent customers from getting into debt with their water bills wherever possible, and helping those who are in debt to recover their financial security.

## Identifying gaps within our PSR data

In chapter 5 of our supporting insight report, we discuss the gaps we have identified within our PSR data.

Across our Cambridge and South Staffs regions, we estimate that just under 34% of households surveyed through our tracker research during 2023/24 said

there were one or more people living in their property with a circumstance that could make them eligible for our PSR. This includes those with a short-term or transient vulnerability. This figure excludes any households with a financial vulnerability. We compared this with the number of household customers currently registered on our PSR.

This figure rises to 45% when we include households who say they have a PSR vulnerability or are in a situation that puts them at risk of not being able to pay their bills.

At the end of the 2023/24 financial year, the total number of households receiving financial support from us was 61,752. This represents 9.1% of our household customer base. In 2022/23, a report we commissioned from CEPA highlighted that 84,000 of our households were in water poverty (at the 3% bill to income ratio). This is 12.5% of the total number of households we supply. The number receiving financial support represents 9% of the household population in our Cambridge region and a significantly higher 13.3% in our South Staffs region.

Linked to this, our customer promises tracker research shows that in 2023/24 30% of households did not agree that they can afford their clean water bills. The figure is 25% in our Cambridge region and 32% in our South Staffs region – a 7% difference. The proportion saying they found their bills unaffordable is 17%, with 13% saying their neither agree nor disagree, or do not know.

We will carry out additional modelling ahead of publishing our final vulnerability strategy. This will enable us to more robustly compare and contrast (or triangulate) data sources and insights. Doing this will give us an enhanced view of the gap between our current PSR database and the number of households who should be registered. In chapter 5 of our supporting insight report (table 11), we set out more detail on the main risk areas.

## Better understanding vulnerability – our ten-point behavioural model

We consider the research discussed in the previous chapter highlights the need for us to set customer vulnerability within the context of human behaviour. This is because we think it is easier for our teams delivering the services to relate to different behavioural groups and develop appropriate solutions that meet the needs of customers who display these different behaviours.

So, we have identified ten core behaviours on which we can build our support and inform the training programme for our people. These are taken from a thematic review of our customer research, and those across the water and energy sectors and stakeholder feedback. We set out the ten core behaviours in the table below. This behavioural framework will help shape our final delivery and training plans.

Core behaviour	How the behaviour links to our customers' ability to cope
Struggle to understand communications	Difficulty in understanding written, numerical or financial material, including English not being spoken as a first language. This puts customers at risk of losing out on support or missing bill payments.
Strong emotional reactions	Prone to even a small trigger, as a result of negative past experiences, causing customers to express an extreme emotional reaction.
Struggle to plan effectively	Where someone may not be able to make a plan, or even to plan at all. This normally occurs during a temporary, high-stress situation such as redundancy or bereavement, or as the result of certain cognitive conditions. For customers who are unable to budget, it can lead to financial difficulties. It can also affect their ability to cope in the event of the water supply being interrupted – for example, following a mains burst – and if there is no proactive support in place.
Struggle to process information	Some physical or mental health conditions can make it difficult for people to process information and understand it. This can lead to customers making choices that can have a negative impact on them.
Memory issues	A person's ability to store and remember short- and/or long-term information is diminished. This can lead to them forgetting to pay their bills or remembering the types of support on offer. It could also mean them not being able to complete a task they had already started.
Struggle to maintain attention/concentration	Where someone struggles to focus, making comprehension more difficult. This can make it harder for customers to process information, especially if it is complex, and can lead to them forgetting to complete all the steps when registering for support. It means making information easy to understand and breaking it down into manageable chunks.
Loss of trust	Where someone withdraws from interactions as they no longer trust the organisation. Normally, this the result of a negative past experience with us, or another organisation or supplier. This loss of trust can lead to a customer not choosing to register for support.
Fear of the unknown	Some people find change difficult. They may suffer from low self-esteem or have a low sense of self-worth, making it difficult or too hard for them to believe they can take action. This can lead to people not signing up for support. For these customers, having clear and reassuring communication is vital.
Pride/stubbornness/self-deception	Some people can convince themselves that they do not need support or do something that will obviously help them. This can often be based on untruths or misconceptions about the type of help and support available. This can lead to customers deciding they do not need to ask us for help, or convincing themselves they are not behind with their bills when they are.
Struggle to access support	A person's physical or mental health condition means they are unable to access support, which can have a negative impact on their wellbeing. This includes an inability to access digital services to manage their bills or customer account. Or they may not be able to leave their home during an incident to collect supplies of bottled water.

# Our draft vulnerability strategy

**We recognise that a vulnerability strategy based on people’s behaviours and our customers’ ability to cope means we have to take a different approach to service and support.**

At the same time, we have to continue delivering interventions that ensure water bills are sustainable and affordable over the long term. And we also have to manage demand effectively and reduce the volume of water our customers use, while continuing to meet the needs of

those customers with health needs that mean they have to use more water than other customers.

The aim is to develop a ‘help when you need it’ approach to support which recognises that vulnerability can be

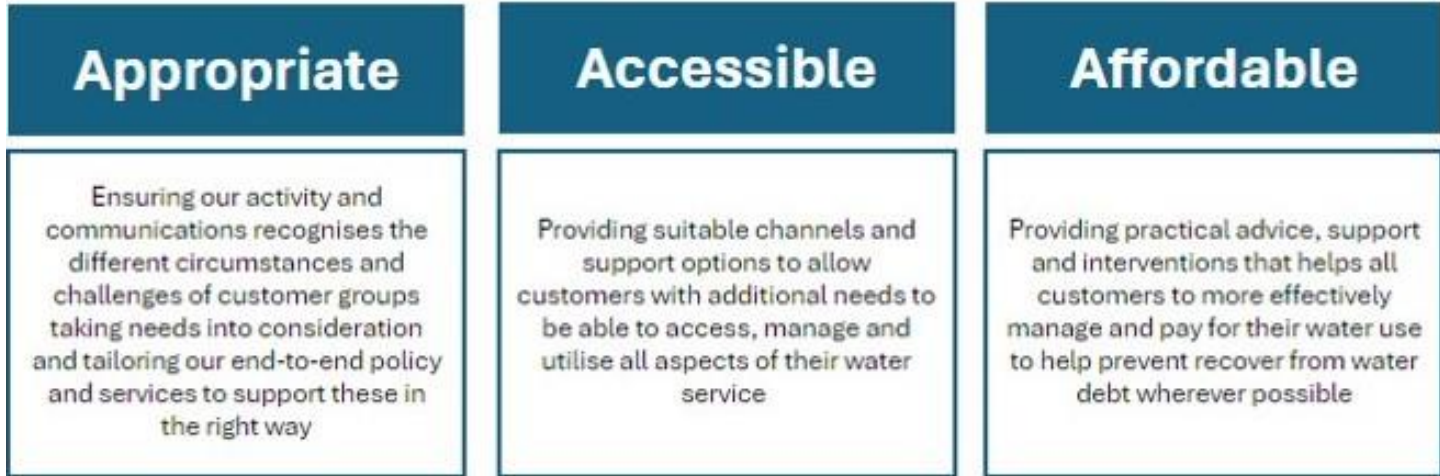
transient and that individual customers’ needs can change over time.

We summarise our draft strategy below, and describe in more detail how we will deliver each of the elements over the short and medium term.

## Our draft strategy

**Building on core **customer strategy** principles and delivery to enhance approach to ensure inclusivity of activity**

**Delivering a service and support that is inclusive of the different needs of our customers delivering positive customer outcomes, now and ongoing;**



## Understanding, educating and capturing needs

### What we will do

We will ensure we understand the needs of all our customers, using the complete range of tools we have at our disposal to capture those needs and develop approaches that align with our vulnerability principles. We will develop

a customer-centric approach that aligns with our wider business values (impactful, customer focused, trusted and professional).

### How we will do this

#### Training our customer-facing people

- We will develop an **enhanced training package and toolkit** for all our customer-facing people. This will

include a mix of training and support options, and will help our people to identify the ten core behaviours identified on page 17 that can affect customers’ ability to cope.

- We will **educate our teams and provide additional support**. Alongside this, we will provide ‘lived experience support’, using the things we have learned through our community hub and community team.

## Reviewing our customer base and customer needs

- Through our ‘Help when you need it’ programme, we will **offer more bespoke support** for customers experiencing transient vulnerability. This includes those customers who may not have had to deal with financial matters previously, but who have experienced a change in circumstances.
- We will carry out a review of those customers we know are in the **transient stages of support**. We will reach out to these customers to offer a more bespoke level of assistance as required.
- For customers who contact us on a regular basis, we will **provide additional support** for our frontline teams to ensure the customer contact is dealt with effectively and efficiently.

## Utilising our systems and data effectively

- We will play our part to **develop a consistent approach** to data sharing within and outside the water sector.
- We will **develop our systems and processes** to enable us to efficiently target our support to customers in vulnerable circumstances.

## Providing inclusive customer journeys and support options

### What we will do

We will make sure our approach is inclusive of all our customers, with targeted levels of support that takes individual circumstances into account.

### How we will do this

#### Adapting our communication channels to support customers’ needs

- We will regularly **review our communication channels** and involve

our communities and other stakeholders to ensure we capture how best to support customers. As part of this, we will look to emulate best practice elsewhere – for example, the Citizens’ Advice ‘[Good practice guide](#)’ for energy suppliers.

- To ensure the support we provide is inclusive of all customers, we will **use a range of evaluation tools** at our disposal. This includes website audits, accessibility reviews by charity partners, and looking at best practices in the digital exclusion space.
- We will also use our customer data to **identify PSR gaps** – geographical locations in particular. This will enable us to target our communications and marketing campaigns in these areas.
- We will make sure that when we schedule our planned mains rehabilitation schemes we **target areas of PSR support** in advance of the work so that customers are recorded and their needs taken into consideration.

## Reviewing our service level agreements and customer journeys

- We will **review all our service level agreements (SLAs)** for customers who need extra help.
- We will **review the ‘join’ letter** for customers registering for the PSR. We will produce this in ‘easy read’ format, outlining the key areas of support. We have recently appointed a Customer Journey Manager within the business, whose role is to review all customer journeys and look for key areas of improvement.

## Employing specialist teams to support high-risk customers

- We will set up a ‘**Help when you need it team**’, which will be upskilled to provide enhanced support and assistance to customers. This includes working with trusted third party providers.

- Through this team, we will **develop ‘personal assistance plans’** for customers, which will include key timeline events, such as annual billing and meter reading. This will help us to understand more about their ability to cope in the event of a major incident, for example.

## Carrying out third party audits of our key communication channels

- We will work with **specialised charity partners** to review our communication channels. This is to ensure we always deliver meaningful communications for all our customers, with particular reference for those who need additional help and support.

## Extending support beyond water

### What we will do

We will signpost sources of third party support and work with a range of partners to provide a service for customers in vulnerable circumstances that goes beyond ‘just water’.

### How we will do this

#### Aligning with key referral partners and exploring charity partnerships

- We will focus our attention on **aligning with partners** that support the delivery of our strategy.
- We will work with **local and national partners** within the charity sector to gain expertise and insight into how to work more effectively with customers in vulnerable circumstances.
- We already work with the [Fuel Bank Foundation](#) and the [Heat Fund](#) to support customers living without light, heat or power. We will **extend our training** for people in our contact centre to include fuel debt advice, enabling customers to access support. This is because fuel and

water poverty are closely aligned as indicators of vulnerability.

- We are also partners in the [Care Leaver Covenant](#), a national programme that supports care leavers aged 16 to 25 to live independently. We will use the ‘Help when you need it’ team to **support care leavers**, helping to give them knowledge and confidence about things like paying their bills and payment plans.

### Continuing to develop our community outreach programme

- While our approach to community outreach is wide-ranging and flexible, we recognise the importance of **keeping up to date** with the support that is needed for customers with complex needs.
- We have proven a face-to-face approach works through the work of our community team and through our community hub. We will **expand this knowledge**, giving people in the ‘Help when you need it’ team the skills they need to deliver effective and empathetic face-to-face support to customers in vulnerable circumstances.

### Taking a whole business approach to our strategy

Delivering our strategy successfully will require input from the whole business. So, we have identified the enablers we need to ensure we achieve successful outcomes for customers – and for us – over the long term. Below we set out some of the key enablers we have identified.

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## Internal and external feedback

- We will **develop internal forums** to discuss customers in vulnerable circumstances. This will allow us to develop our knowledge and discuss individual needs that may require interventions from different stakeholders.
- We will set up a vulnerability sub-group with external stakeholders. This will allow us to **gather feedback from experts** who have hands-on experience of working with customers who require additional help and support.
- We will continue to develop our **customer engagement programme**. This includes using targeted PSR forums and tariff research. As part of this, we will continue to improve our business as usual (BAU) satisfaction surveys to include more channels and enhanced satisfaction reporting.
- We will **carry out research** to enable us to develop customer personas linked to the ten behaviours outlined on page 17, to feed into our planning and training programmes.

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## Data and reporting

- We will develop **reporting dashboards** to better monitor customer contacts and complaints, and satisfaction across all customer segments.
- We will work closely with our **Customer Insights team** to look at triggers of vulnerability, societal trends and hot spots. We will report at both a regional and combined level to enable us to assess differences in customer need. This is important as it ensures we continue to provide a

regional focus, given the notable differences in demographics in our two operating areas.

- We will **overlay digital and mobile data availability** with PSR customers to fill gaps where customers may not have digital access. This will help us during major incidents where it may not be possible to contact customers through conventional digital means.

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## Communications and marketing

- We will tailor our **communications and marketing** more effectively, building an approach around customer behaviours and our transactional segmentation.
- We will **learn from best practice** within and outside the water sector to adapt our communication styles. We will apply the principles of plain English when communicating with customers and use easy read formats for customers with learning difficulties or low levels of literacy. And we will develop a customer-friendly privacy policy.

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## Culture and leadership

- We will **introduce behaviour triggers** to enable us to identify the additional support mechanisms needed for customers in vulnerable circumstances. This will help us to develop an inclusive culture within our business.
- We will build on our **‘customer closeness’ programme** to ensure we see a cultural shift.
- We will **fully align our vulnerability strategy with our values**, so that we are always impactful, customer focused, trusted and professional.

# Meeting Ofwat’s objectives



**In developing our draft vulnerability strategy, we have had regard to the objectives set out in Ofwat’s guidance. It is our ambition to go beyond these objectives to ensure we always deliver our best for customers, including those in vulnerable circumstances.**

For the purposes of this draft vulnerability strategy, we are showing how we are compliant with Ofwat’s objectives. We

will continue to build on this work as we develop our vulnerability strategy in the coming months. In the table below, we

demonstrate how our strategy is compliant. There is more detail in the accompanying Excel spreadsheet.

Ofwat objective	Ofwat’s expectations	How our strategy meets Ofwat’s minimum standards
<b>Objective 1</b> Provide a high standard of service and support	<ul style="list-style-type: none"> <li>Companies should provide high standards of service and support to customers requiring extra help.</li> <li>Customers who need extra support receive it and are happy with the service provided.</li> <li>Customers know what extra help they can expect from the company.</li> <li>Companies aspire to improve levels of service and seek to ensure that customers who have extra help needs are no less satisfied with their service than customers as a whole.</li> </ul>	<ul style="list-style-type: none"> <li>Through our ‘Help when you need it’ programme, we will develop personal assistance plans for customers who need extra support to assess their resilience to different situations. These plans will be tailored to customers’ individual needs, giving them advice about what to do in different situations.</li> <li>We recognise that employee training and support is crucial if we are to effectively help customers with specific needs, including those in vulnerable circumstances. We will create specialist training packages for our people across a range of vulnerability challenges to enhance what we already have in place.</li> <li>We will apply the principles of plain English to ensure our communication meets customers’ needs. We will carry out further research segmentation of what our customers want to see on our bills and how they expect that information to be presented.</li> <li>We will continue to use our customer insights tracker to track customer feedback and will learn from this insight.</li> <li>We already hold debrief sessions for the business following a major incident. We will build on this approach to include statistics about different groups of customers and feedback from those affected to ensure continued improvement across the business.</li> </ul>

Ofwat objective	Ofwat’s expectations	How our strategy meets Ofwat’s minimum standards
		<ul style="list-style-type: none"> <li>We know that being without water for any period of time can be a distressing and worrying experience for customers. This is why we already offer a range of support to safeguard our customers and make sure we look after their individual needs during a major incident. We categorise these needs into priorities, with those at the highest risk of detriment – because of medical conditions, for example – having the highest priority rating. This enables us to escalate levels of support depending on how long customers have been without water. But if any customer needs support at any time during a major incident, we will endeavour to provide this, regardless of priority.</li> </ul>
<p><b>Objective 2</b> Develop services that are inclusive by design</p>	<ul style="list-style-type: none"> <li>Water companies’ systems should be designed to meet the needs of a diverse customer base.</li> <li>Services and communications should be designed in an accessible and inclusive way that does not harm customers who have undeclared extra help needs.</li> <li>Companies should collaborate with service users and subject matter experts in designing their services.</li> </ul>	<ul style="list-style-type: none"> <li>We are committed to engaging with customers in vulnerable circumstances, and with the trusted organisations that represent them. This helps to give us a deeper understanding of complex vulnerability, including transient or temporary vulnerability.</li> <li>Partnerships are key to our strategy. We will continue to build meaningful relationships with third party organisations and collaborate on designing our services. This will ensure the best possible outcomes and communication style for our customers.</li> <li>Where we engage with customers through the data validation process, we will follow up with any customers who are registered for support by a nominated person or third party organisation. This is to ensure we have the correct information to support those customers.</li> <li>A guiding principle for us is that the services we provide to customers in vulnerable circumstances must be tailored, specific, inclusive and accessible. We have a responsibility to make sure we deliver critical services that all our customers need in an efficient and cost-effective way.</li> <li>‘Inclusivity’ means we think about the needs of all our customers, not just particular groups. We recognise that we do not have all the answers, and that we need to work with stakeholders to help inform how our services evolve. We are committed to proving how our services best meet customers’ needs based on robust stakeholder engagement and feedback.</li> </ul>
<p><b>Objective 3</b> Identifying customers</p>	<ul style="list-style-type: none"> <li>Companies should have systems in place to effectively identify customers who may have extra help or support needs; and those customers who are willing to be able to do so easily.</li> </ul>	<ul style="list-style-type: none"> <li>We will work in partnership with others to deliver a wide range of services that target support at the areas where it is most needed. We already have a strong community presence. We will enhance this further to work in more rural communities experiencing poverty issues and a lack to access to more mainstream support.</li> <li>We will use smart data to improve how we identify customers who may have additional needs. We will continue to prioritise geographic and demographic areas of high eligibility where we do not already have significant numbers of customers on our PSR. We will analyse social demographics, vulnerable customer data, PSR data gaps and customer trends to locate customers who may not already be aware of the support we offer.</li> <li>We will provide support and referrals through outreach partners to ensure more households experiencing water poverty receive a wide range of support and advice, covering water, energy and digital upskilling.</li> <li>We will continue to look at integrated approaches for partner referral schemes. We currently have a passport scheme with various local authorities for customers who apply for and receive adaptations for disability. We capture both PSR data and affordability referrals by targeting the level of subsistence for these grants.</li> </ul>

Ofwat objective	Ofwat's expectations	How our strategy meets Ofwat's minimum standards
<p><b>Objective 4</b> Recording needs</p>	<ul style="list-style-type: none"> <li>Customers' extra needs should be effectively recorded and reviewed with customers informed about how their data is used and their views around privacy understood and taken into account.</li> </ul>	<ul style="list-style-type: none"> <li>We will capture more information about our PSR customers.</li> <li>We will continue to meet Ofwat's requirements for data validation and verification.</li> <li>We already have an effective data strategy in place specific to meeting the needs of customers in vulnerable circumstances. This includes carrying out data checks every two years. We will use data analysis to develop and deliver service offerings. This has an important role in helping us to determine if certain groups of customers need more targeted help. We will also take additional steps, such as follow-up calls and face-to-face contact.</li> </ul>
<p><b>Objective 5</b> Vulnerability strategies</p>	<ul style="list-style-type: none"> <li>Companies should have strategies in place to support the extra help needs of their customers.</li> <li>Companies should consider and plan how they can deliver extra help to all customers who need it in the short, medium and long term.</li> </ul>	<ul style="list-style-type: none"> <li>We are committed to meeting our obligations to treat all customers, including those in vulnerable situations fairly. We will put in place a vulnerability strategy, which we will review each year.</li> <li>We will develop vulnerability champions across our business to provide 'in the moment' advice and support for customers.</li> <li>We will develop personal assistance plans for customers, going beyond our existing customer support, where possible.</li> <li>We will continue to engage with relevant stakeholder groups and forums so that we remain up to date with latest developments in the customer support space.</li> </ul>



## Bringing our strategy to life – next steps



**We recognise the importance of having a strategy in place to help us support customers in vulnerable circumstances, including those experiencing transient vulnerability because of changes in their personal circumstances.**

But we also recognise how important it is to bring our strategy to life, to give it more meaning across our business and to embed it in the services we provide to our customers. Over the past few years, we have made considerable strides in our service delivery, putting in place a firm foundation on which to build our support for customers in vulnerable circumstances. We have implemented a number of initiatives, including:

- opening a community hub in Wednesbury in our South Staffs region, offering face-to-face contact and advice on a range of topics;
- putting in place a dedicated community team, with outreach programmes in both our Cambridge and South Staffs regions;
- having PSR data capture and validation programmes in place, and regularly reporting on the numbers of customers registered;
- making a PSR toolkit and training available to frontline teams, to help them identify customers who may be in vulnerable circumstances;
- working collaboratively with partners and third party groups to enhance levels of support;
- making bottled water supplies available to high-risk groups during major incidents; and
- putting a language line and community language support in place.

In the case study below, we highlight some of the ways we are providing help and support when – and how – our customers need it.

## Bringing our strategy to life – going beyond water to support our customers and making a positive impact in our communities

As a community-focused initiative, our community hub hosts school uniform events each year. We recognise that buying new uniforms can be a costly exercise, so we try to help out where we can.

We start to take donations just before schools break up for the summer holidays. The donations are for all ages and various schools in the main catchment areas in Wednesbury. We pass on any donations that we are not able to redistribute because they are in a poor state of repair to the Acorns Hospice charity shop for recycling. This provides the charity with a valuable source of income.

We generally have large amounts of uniform donated. So, we also redistribute the excess and swap items with local foodbanks, such as The Brasshouse Centre in Smethwick, for example. We also signpost customers from other areas to their local uniform bank through our partnerships with Sandwell Churches Link and the Public Health team at Sandwell Council.

When we have surplus ‘badged’ uniform items, we donate them to Citizens’ Advice for their overseas project, where children who have a uniform of any description can attend school and receive an education.

We have been running this event for five years and are regarded as the ‘go to’ location in Wednesbury for customers to obtain free pre-owned and new donated school uniforms. It also gives us the opportunity to promote our full range of support services and offer face-to-face support to help customers complete their applications.

The event is now so popular that we often get customers asking when the next one will be held.

We also offer our customers a ‘one stop’ approach – building partnerships in our communities to offer customers a broad range of help and support. For example, in partnership with the Fuel Bank Foundation, we can offer customers with a pre-payment energy meter a fuel bank voucher up to the value of £49. This helps us engage with customers in vulnerable circumstances who may not have asked us for help with their water or energy bills.

In addition, we have adopted a mobile ‘go where they go’ approach to community engagement. So rather than wait for customers to come to us, we target food banks and food pantries across our Cambridge and South Staffs regions to reach customers who may not be aware of the support options we have available. We also work with social housing providers and the Private Sector Landlord Association, as well as with local authority tenancy support teams to share information and encourage referrals about the financial and other support we have available.

## Next steps and core areas of delivery

<b>Aim/vision</b>	<b>Delivering a service and support that is inclusive of the different needs of our customers delivering positive customer outcomes, now and ongoing that is appropriate, accessible and affordable</b>		
<b>Strategy</b>	<b>Understand, educate and capture needs</b>	<b>Inclusive customer journeys and support options</b>	<b>Extending support beyond just water</b>
<b>Core Area</b>	<ul style="list-style-type: none"> <li>• Full training and toolkit for customer facing staff</li> <li>• Data sharing approaches</li> <li>• Full review of customer base and needs</li> <li>• Systems flags to identify and utilise</li> <li>• Full review of activity</li> </ul>	<ul style="list-style-type: none"> <li>• Adapted channels to support with people’s needs</li> <li>• Review all key journeys for SLA and standards e.g. complaints response times</li> <li>• Third party audits of key comms channels</li> <li>• Specialist teams upskilled to support high risk customers</li> <li>• Prioritised service response and protection for customers in need</li> </ul>	<ul style="list-style-type: none"> <li>• Alignment with key referral partners</li> <li>• Charity partnerships (audit and advice)</li> <li>• Community outreach programmes and in home support and advice</li> </ul>
<b>Key Enablers</b>	<b>Internal &amp; External Feedback</b> <b>Data &amp; Reporting</b> <b>Marketing &amp; Communications</b> <b>Culture &amp; Leadership</b>		

We are committed to driving improvements in our offerings for vulnerable customers, and welcome Ofwat’s guiding principles in this space. We will continue to build on this draft vulnerability strategy, making sure it

aligns with our business plan for 2025 to 2030. Once we have clarity on our draft and final determination on our plan from Ofwat, we will create a measurable delivery plan that is underpinned by our customers’ views.

We recognise the importance of being able to measure our progress in this area. So, we are committed to developing transparent milestones to report against so that customers can hold us to account.

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