

## **Service For All - Compliance**

The table below outlines our compliance with Ofwat's 'Service for all' vulnerability guidance.

June 2024



No.	Minimum expectation	Our compliance against the minimum expectations	Our current services and our future plans	How we plan to track our progress	Any challenges we see in meeting this expectations	Our targets and measures of success
1.1	Companies should adapt their services to customers in line with any known extra help needs. This is especially important during times where there is increased risk of harm; for example, during incidents.	Compliant	<ul> <li>Our Priority Services Register is designed for customers who have health, access or extra communication needs and helps us tailor our services to support households who may need extra help, so we are reassuringly there, whatever the need.</li> <li>Our initiatives to date:</li> <li>Support during an incident - We hand deliver bottled water to our highest priority customers on the register and our teams carry bottle openers for those customers with mobility and dexterity challenges.</li> <li>Ways to get in touch - We offer a range of ways for customers to get in touch. These include face to face to sits from one of our Here For You Officers and the option for customers to visit us at our Head Office in Redhill, Surrey, which is fully accessible. Last year, we also introduced SignVideo as a contact channel.</li> <li>Alternative formats - We currently offer our customers bills in alternative formats, such as braille, large print, electronic PDF and audio CD.</li> <li>Foreign language support - We provide this service through our team of internal volunteers and our website has an inbuilt accessibility tool, ReciteMe, which translates the information into more than 100 languages.</li> <li>Homes visits - We offer a number of options for accessing people's homes, including a 'knock and wait' service, and a 'password scheme' to give customers the confidence we are who we say we are. Our field teams are also equipped with Braille passes to provide an inclusive service for our customers with visual impairments.</li> <li>Help checking water consumption - We offer a meter reading service, for customers who may may want more frequent meter readings throughout the year. This also includes the option to re-locate a meter to a more accessible location if needed.</li> </ul>	<ul> <li>We will monitor and track our progress with this minimum expectation in a variety of ways:</li> <li>Each quarter, we carry out a 'Voice of the Customer' survey, covering a number of topics including satisfaction of those customers on our <b>Priority Services</b> <b>Register</b>. We will track this each quarter to make sure we are achieving our minimum target.</li> <li>Our Customer Scrutiny Panel (CSP) and CCW Liaison Meeting reflects the interests and expectations of our customers. We will provide quarterly updates to our challenge group on our progress against the plans we have set out to achieve.</li> <li>We have a dedicated 'Customer Committee', which is backed by senior board members. This committee meets each quarter to review our progress on our customer improvement plans and endorse our future strategies.</li> </ul>	As we share data and increase the number of our customers on our <b>Priority</b> <b>Services Register</b> , we need to carefully manage customer expectations around bottled water delivery, especially in the event of a large scale incident.	Customers on our Priority Services Register have an average satisfaction score greater than 8 out of 10.



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1.1 cont.		Compliant	<ul> <li>Our plans in the short term:</li> <li>Expanding our self-serve capability – We'll launch a new feature in our customer platform 'MyAccount', to allow customers to easily sign up and manage their registration to our Priority Service Register.</li> <li>Expanding ways to pay - We'll launch 'open banking', outbound email and SMS payment links. We'll add Apple Pay to our payment options as well as improve the customer journey on our automated payment line.</li> <li>Our medium to longer term plans:</li> <li>Communications in alternative formats – We'll expand this service where possible to include other forms of communication, such as notifications about planned works.</li> <li>Improving alternative language support – We'll explore further translation services, particularly for those alternative languages most commonly used by our customers.</li> <li>Smart metering - We plan to roll our smart meters across our region, which will give our customers greater control and visibility over the water they use.</li> <li>Improving our support during an incident – We'll continue to deliver bottled water to those that need it the most, and we'll contact our customers in alternative formats during planned and unplanned incidents, and this will extend to any nominee contacts. We'll also launch a post event check-in for our most at risk category customers to see if there's anything further they need from us.</li> <li>Expanding ways to get in touch - We will introduce new contact channels such as live chat.</li> </ul>	• We regularly conduct reviews of our customer journey, and through these reviews we will complete ad-hoc testing to understand how well we are performing against our action plans within this expectation. This includes asking all affected customers, including those on the <b>Priority Services</b> <b>Register</b> , for their feedback after a water supply incident.		



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1.2	Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.	Compliant	<ul> <li>We want our customers to know the level of support available, and importantly that the information is presented in a way that customers can easily access and fully understand, no matter their need. We understand that part of this also entails equipping our partners with the relevant information for them to communicate effectively with their members.</li> <li>Our initiatives to date:</li> <li>Dedicated website page – We have improved the information on our website. This page can be found here https://seswater.co.uk/your-account/priority-customers.</li> <li>A friendly welcome – We have introduced a welcome letter for customers joining our Priority Services Register.</li> <li>Support information – Details of our support, and how to contact us are displayed on our website, customer letters (including bills) and emails. This includes email addresses, social media channels, our dedicated phone line, face-to-face locations and our postal address. Customers can self-serve to pay bills, submit meter readings and see how much water they use via our online MyAccount platform. In an emergency, customers can call us 24/7, 365 days a year.</li> <li>Customer leaflets – We have a number of customer facing leaflets to inform our customers about the financial and service-related support we offer. These are used at our community events, partner engagements and home visits.</li> <li>Partner information pack – We've created a partner information pack so our partners can promote the support we offer to their members and in a clear and consistent way.</li> <li>Simple sign up – We have created one simple online application form for our customers to fill out.</li> </ul>	<ul> <li>As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.</li> </ul>	We don't anticipate facing any significant challenges in meeting this expectation.	Customers on our Priority Services Register have an average satisfaction score greater than 8 out of 10. More than 80% of customers receiving support, feel that SES Water's extra support services are 'helpful'.



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1.2		Compliant	Our plans in the short term:			
cont.			<b>Partner newsletter</b> – We'll relaunch our quarterly partner newsletter 'Connected' to increase the engagement and reach through our trusted partnerships, and equip them with improved information about our services for their members.			
			<b>Customer friendly communications</b> – We'll improve our written communications, including our complaint responses and bills, so they are customer friendly and jargon-free. This will also include the redesign of our current customer bill, and how we present our core customer information, such as our Customer Charter. We will consider all vulnerabilities, including cognitive impairments (such as dyslexia) when completing these reviews.			
			<b>Enhanced application forms</b> – We will optimise our online application form, to make it even easier for customers to apply for the help they need.			
			<b>Partner page</b> – We'll launch a dedicated page on our website, promoting our key partner network and their key services and contact information. We will signpost customers to this page as and when necessary.			
			<b>Telephone system</b> – We will make sure our telephone system is reviewed regularly and simplified where possible.			
			Our medium to longer term plans:			
			<b>Enhanced welcome</b> – We'll improve our welcome letter when customers join our <b>Priority</b> <b>Services Register</b> , by tailoring it to the customer's specific need, and whether the help requirement is considered transitory or longer term.			
			<b>Improved website accessibility</b> – We'll review our website navigation and page structure to make sure information is easy to find, and labelled in a way customers understand. We'll also explore our options for working towards AA or AAA compliance.			
			<b>Continuous review</b> – We will monitor and continually evolve and improve the information we present to our customers, by working with and learning from our partners and stakeholder groups.			



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1.3	Companies should seek to continuously improve the service they provide to customers who need extra help. This may include finding innovative ways to design or implement services.	Compliant	We believe that continual improvement is key to making sure our extra help services are truly reflective of our customers needs and preferences, now and in the future. We will continually to learn and involve our stakeholders and partners in the development of our plans to support customer who need extra help. <b>Our initiatives to date:</b> <b>Stakeholder engagement</b> – We regularly engage with our customer challenge group, Customer Scrutiny Panel (CSP), as we recognise the importance of independent challenge on both our ongoing performance and our future plans. We also work with our partners to provide feedback on our services to make sure they are fully representative of our customers' needs. <b>Customer insight and engagement</b> – We currently collect insight from several different sources, such as customer surveys, contact and complaint analysis, website analytics and our 'voice of the Customer' programme. We regularly engage with our online customer panel 'Talk on Water', to get their view on our initiatives. <b>Our plans in the short term:</b> <b>Continued customer engagement</b> – We'll continue to test our new initiatives through our online community panel Talk on Water', our Customer Scrutiny Panel, or through ad hoc customer research pieces. We will make sure our customer challenge groups fully represent a broad range of vulnerabilities (either through lived experience or experts in their field, representing their members). <b>Our medium to longer term plans:</b> <b>Co-designing and collaborating</b> – We'll start collaborating and co-designing our journeys, services and policies with our partners and customer positive outcomes for all. <b>Enhanced reporting</b> – We'll improve our reporting dashboards to further improve our understanding and identification of customers who need extra support, so we can not only better target our proactive communication campaigns, but personalise our customer experience. <b>Using data wisely</b> – We'll improve our data mapping capabilities to get a more comprehensive view of vulnerability and affor	As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.	We'll need to make sure our customer challenge groups represent a broad range of vulnerabilities when helping us design our services of the future. It may not always be possible to collaborate with customers with lived experience - we plan to work with our partners and wider stakeholder groups in these instances.	We will continue to host quarterly meetings with our customer and stakeholder challenge groups.



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1.4	Companies should use a range of data to monitor the effectiveness of their extra help services, and the satisfaction levels of customers who have made such needs known.	Compliant	<ul> <li>We monitor how we are performing in a number of ways, and routinely use what we learn to drive improvements.</li> <li>Our initiatives to date:</li> <li>'Voice of Customer' programme – We collect qualitative and quantitative insight through our voice of the customer' programme which takes place quarterly. Through these results, we are able to directly compare how the satisfaction of customers receiving extra help compares to our wider customer base. We also receive customer feedback through our online customer panel 'Talk on Water'.</li> <li>Website analytics – We actively track how our customers use our website so we can continually improve our user experience. This includes reviewing how our customer's behaviour changes during an incident.</li> <li>Post incident research – We complete post incident research with all our customers to understand the experience they had with us during an incident, such as a water outage. We use this insight to improve our services.</li> <li>Operational and system data – In addition to analysis of our quarterly C-MeX results, we routinely conduct post-call surveys to gather immediate feedback and carry out root cause analysis of unwanted and repeat contacts and complaints. We compare the results for those customers on our Priority Services Register to our wider customer base to identify areas for improvement. We also use system data to track the performance of our Priority Services scheme.</li> <li>Stakeholder engagement – We regularly meet with local councillors, MPs and CCW to listen to their feedback and use it to shape our policies and customer communications. Through our partnerships, we work with organisations that represent customers who may have additional needs to help us design inclusive services and policies and communicate better with their service users. Our Customer Scutiny Panel also advises and challenges us as we deliver change and monitors our performance, reporting annually on our progress.</li> <li>Customer data – We are continually improving the quali</li></ul>	<ul> <li>As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.</li> <li>We have weekly and monthly meeting with our senior leadership team and board members where we present our operational performance against our key performance indicators (KPIs).</li> </ul>	Whilst we don't anticipate significant challenge in meeting this expectation, we need to be mindful that we may not always have the opportunity to capture feedback from customers who are on our <b>Priority</b> <b>Services Register</b> for a short period of time (defined as transient vulnerability, for example due to a short term illness). We will monitor this through reporting and consider and further developments if deemed necessary.	Customers on our Priority Services Register have an average satisfaction score greater than 8 out of 10.



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1.4		Compliant	Our plans in the short term:			
cont.			<b>'Voice of Customer' programme</b> – We'll broaden the range of questions we ask our customers on the <b>Priority Services Register</b> to cover a range of topics (such as bill understanding) so we can identify areas for improvement.			
			<b>Quality assurance (QA)</b> – We will embed a QA programme across our frontline office teams to monitor the effectiveness of our training (as outlined in Expectation 3.3) Through this we will get invaluable feedback on our customers' interaction with us, as well as how our advisors are performing.			
			Our medium to longer term plans:			
			Customer satisfaction measure – We'll implement a customer satisfaction measure across all our channels - including digital - to get feedback on how satisfied our customers are with our services. We'll compare the results for those customers on our <b>Priority</b> Services Register to make sure they are experiencing equal levels of service.			
			Speech and text analytics – We'll launch speech and text analytics to further deepen our understanding of every customer interaction.			
			<b>Behavioural analytics</b> – We will track how customers on our <b>Priority Services Register</b> interact with us, compared to the rest of our customer base. This includes the likelihood to complain, contact frequency or channel preference. We will use this insight to determine future initiatives.			



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2.1	Companies should interact with customers in a way that is inclusive for a diverse range of audiences. This should be underpinned by relevant insights, which may include research, engagement and accreditation.	Compliant	As detailed in expectation 1.1 as soon as we become aware of a customer who requires extra help we make sure that we communicate in a way that meets their needs. We design our services with our customers in mind, making sure we provide an inclusive service for a diverse range of needs and audiences. We regularly seek the views of our customers, our customer challenge groups and expert partners to continuously improve our services. <b>Our initiatives to date:</b> <b>Website accessibility</b> – We've provided the accessibility tool ReciteMe on our website, which gives screen reader, alternate language translations and enlarged text. The toolbar also easily translates all our website content into more than 100 languages, including 35 text to speech voices. Last year alone, 48 languages were used via Recite Me, which shows the level of cultural diversity across our supply area. <b>Communication channels, SignVideo and other third parties</b> – We've introduced SignVideo as a contact method, which allows customers who use British Sign Language to speak to us via a translator or speak to us via a live chat. The service is available 24/7, so customers can contact us in an emergency. We also provide our customer bills in alternative formats, and actively signpost customers to third partiers should they require more specialised support. <b>Dedicated specialist support</b> – We have expanded our home visits as we know some of our customers prefer face to face conversations. As well as using our dedicated field team, we also offer customers the option to visit us at one of our weekly community engagements, or our Head Office, so we can talk to them about how we can help face to face. <b>Support information</b> – Details of how to contact us, and the support we offer customers who may need extra help, are displayed on all our channels, including our website and on our water bills. More information on how we plan to increase the awareness of the support we offer are outlined in Expectation 3.2. <b>Partnerships</b> – We have patterned with several	<ul> <li>As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.</li> </ul>	The key challenge is making sure we design services that are fully inclusive and accessible for a full range of vulnerabilities. As such, the data we hold about our customers becomes ever more important.	Customers on our Priority Services Register have an average satisfaction score greater than 8 out of 10.



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2.1		Compliant	Our plans in the short term:			
cont.			<b>Best practice</b> – We have purchased the British Standard for Inclusive Service and are working towards compliance with the guidance.			
			<b>Cross promotion of our schemes</b> – Our 'Here For You' programme encompasses our <b>Priority Services Register</b> and financial support tariffs, and we'll continue to promote our financial schemes to our customers on the <b>Priority Services Register</b> so they are aware of all the support available to them.			
			<b>Customer &amp; stakeholder engagement</b> – As outlined in Expectation 2.3, we will continue to consult with our customers and stakeholders when making changes to our service offering.			
			<b>Customer friendly communications</b> – As mentioned in Expectation 1.2, we will continue to tailor and personalise our external communications making sure that, wherever possible, they are accessible to as many customers as possible. This will also extend to the redesign of our customer bill, where our aim is to make it more accessible to those with low English or low numeracy skills.			
			Our medium to longer term plans:			
			Improved website accessibility – We'll review our website navigation and page structure to make sure information is easy to find, and labelled in a way customers understand. We'll also explore our options for working towards AA or AAA compliance.			
			<b>Co-designing and collaborating</b> – As outlined in Expectation 1.3, we'll start collaborating and co-designing our journeys, services and policies with our partners and customers. We will explore working with customers with lived experience when designing these new services.			



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2.2	Companies should offer their customers a range of ways to interact and communicate. This includes allowing customers to opt for third party billing where appropriate.	Compliant	<ul> <li>We know the importance of offering a range of ways for customers to interact and community with us, in as way that works for our customers.</li> <li>Our initiatives to date:</li> <li>Communication preferences – We currently record our customers contact preferences and needs codes on our customer billing system. This guides how we communicate with our customers in the way that works for them.</li> <li>Ways to get in touch – We offer a range of ways for customers to get in touch. These include face to face visits from one of our Here For You Officers and the option for customers to visit us at our Head Office in Redhill, Surrey, which is fully accessible. Last year, we also introduced SignVideo as a contact channel.</li> <li>Alternative formats – As outlined in Expectation 1.1, we currently offer our customers bills in alternative formats, such as braille, large print, electronic PDF and audio CD.</li> <li>Support information – As outlined in Expectation 1.2, details of our support, and how to contact us are displayed on our website, customer letters (including bills) and emails. This includes email addresses, social media channels, our dedicated phone line, face-to-face locations and our postal address. Customers can self-serve to pay bills, submit meter readings and see how much water they use via our online MyAccount platform. In an emergency, customers can call us 24/7, 365 days a year.</li> <li>Our plans in the short term:</li> <li>Third party billing – We will explore the need for third party billing in our area.</li> <li>Our medium to longer term plans:</li> <li>Alternative formats – We plan to expand this service (where possible) to include other forms of communication, such as notifications around planned works</li> <li>Expanding ways to get in touch – We will introduce new contact channels such as live chat, which customers have told us would be useful.</li> </ul>	<ul> <li>As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.</li> <li>We will track the number of contacts or complaints we have received from customers on the Priority Services Register.</li> </ul>	Whilst we don't anticipate any significant challenges in meeting this expectations, we are reliant on our customers keeping their details and information up to date, so we can meet their needs accordingly.	Customers on our Priority Services Register have an average satisfaction score greater than 8 out of 10. More than 80% of customers receiving support, feel that SES Water's extra support services are 'helpful.



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2.3	Companies should consult with CCW, and engage with stakeholders and other customer representatives, when making significant changes to their proposed service offering around vulnerability.	Compliant	<ul> <li>We very much value the close involvement and relationships we enjoy with our customers, colleagues, local community groups and our stakeholders who have played an active role in developing this strategy. The insights we gain by listening and engaging with them enables us to improve outcomes for our customers. We are committed to continually involving our stakeholders and customers when making any significant changes to our services.</li> <li>In developing our draft strategy we have:</li> <li>Engaged with our partners – In April 2024 we completed 121 interviews with a number of our partners to get their thoughts on what matters to their members and what areas are important when building our vulnerability strategy.</li> <li>Engaged with our stakeholders – We consulted with our Customer Scrutiny Panel across two collaborative sessions in January and March 2024. We also provided regular updates to our dedicated 'Customer Committee' on our progress and plans.</li> <li>Engaged with our customers – In April 2024, we completed eight in-depth telephone interviews with existing customers on our Priority Services Register, who represented a range of vulnerabilities.</li> <li>More information can be found in the Appendix of our draft vulnerability strategy. which can be found here https://seswater.co.uk/about-us/publications</li> <li>Our plans in the short term:</li> <li>We will continue to seek customer and stakeholder feedback on our draft plans once our draft strategy has been published, and we'll compare it against the PSR Standards when these are released in Autumn 2024. We'll continue to refine our plans before publishing our final vulnerability strategy at the end of June 2025.</li> </ul>	<ul> <li>As per Expectation 1.1, we will track progress through our customer and stakeholder challenge groups, clearly evidencing our decision making.</li> </ul>	As per Expectation 1.3, we need to make sure our customer challenge groups represent a broad range of vulnerabilities when helping us design our services of the future. It may not always be possible to collaborate with customers with lived experience - we plan to work with our partners and wider stakeholder groups in these instances.	To be able to clearly evidence how we have consulted with our customer and stakeholder groups when making significant changes to our service offerings.



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3.1	Companies should take active steps to identify customers who require extra help who have not yet been identified.	Compliant	As well our activities to raise awareness of our support schemes (as outlined in Expectation 3.2), we plan to identify customers who may need extra help through our continued work in the community and partners. Our initiatives to date: Community events – We've expanded our programme of community events. Last year we attended 26 events, including Run Reigate, Pride in Surrey and Feasty Fest. In total, we reached an audience of 30,000 customers. Community engagements – We attended more than 100 local engagements across foodbanks, warm hubs and community centres. We've also worked with various local charities including Welcare, Crossroads Care and MHA which all provide support for vulnerable people within our community. Partnerships – We've set up 40 partnerships with local authorities, charities, housing partnerships and many other organisations, to increase awareness and identify customers who need our help. Partner funding – We have provided funding for a number of partner promotions (such as £500 in £10 Greggs vouchers through our partner NightWatch to support the homeless during the last Christmas period) to further expand our reach through our partner's promotional activities. Training – As outlined in Expectation 3.3, our customer care advisors are universally trained to identify and promote our schemes and services. Our future plans: Expand our community events and engagements – We'll increase the range of community events we attend to reach a broader and more diverse audience. We aim to reach at least 100,000 customers through our larger scale events this year. Community projects – We will continue to support and increase our community projects (such as Christmas Hamper deliveries and Crossroads Care fundraising) through our employee 'Give A Day' scheme. Increasing our partner network – We'll continue to increase our partner network, doubling the number of partners we work with, including partnering with those to help us get to harder to reach communities. We'll broaden the type of partners we w	• We will track our progress on this measure through our quarterly 'Voice of the Customer' Programme' and through our own internal reporting to show the number of customer joining the support scheme.	One of minor the challenges will always be identifying those customers who have transitory help needs i.e. who need our support for a short period of time. We plan to increase the awareness of our support (as outlined in 3.2), as well as work with our partner network to help identify customers with short term support needs.	The number of our customers on the <b>Priority Services</b> <b>Register</b> will increase to 11%. More than 80% of customers receiving support, feel that SES Water's extra support services are 'helpful.



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3.2	Companies should take steps to proactively increase customer awareness of the extra help available to those who need it.	Compliant	Awareness is crucial for effective support. We recognise that many vulnerable customers may be unaware of the resources available to them or may not fully understand how to access these services. To help our customers better find this information, our strategy prioritises proactive communication, leveraging the channels we have available to reach our diverse customer base. Our initiatives to date: Welcome letter – We currently send a welcome letter to every new customer joining our area. This signposts them to our services should they be struggling financially or need tailored or alternate communications. Support messaging – We have enhanced the messaging on our communication channels to include information about our support schemes, such as on our website, across our social media channels and our bills. Most recently we have also added 'Here For You' messaging on our envelopes. Promotional activity – To proactively raise awareness, we have also expanded the promotion of our support schemes across our digital channels at key points in the year. This includes a dedicated email campaign to over one hundred thousand customers promoting our financial and non-financial support schemes, and working with community partners to provide this information on their own channels. We have also recently created a short video, promoting our support across our social channels and website. Our future plans: Expand our promotional activity – We'll develop year-round promotional initiatives as we're committed to the continued promotion of our support scheme strough our regular promotional activites. We'll incorporate support scheme messaging at different touchpoints throughout the year. We will test this messaging with our customers and stakeholders, as well as monitor how well these initiatives perform. We'll also use data to help up optimise the customer messaging. Make every interaction count – Through our training (as outlined in Expectation 3.3) we will make sure our colleagues actively promote our support schemes when our cus	<ul> <li>We will track our progress on this measure through our quarterly 'Voice of the Customer' Programme.</li> <li>We will also measure the effectiveness of our promotional campaigns using our own internal success metrics, such as the number of click throughs, unique website visits etc.</li> </ul>	There are a number of minor challenges in meeting the awareness target for this expectation. These are listed below. • We may struggle to increase the awareness of our support schemes in our more harder to reach communities. • Despite increasing the messaging of support schemes and broadening our promotional activities in the last year, we have struggled to move the dial on our combined awareness percentage score. • We know from our Voice of Customer Programme that customers on our <b>Priority Services</b> <b>Register</b> have, unsurprisingly, higher awareness compared to the rest of our customer base (55% versus 36%) We therefore need to better target these customers through proactive, tailored and data led messaging. *Full year scores from our 2023/24 results.	The awareness of our <b>Priority Services</b> <b>Register</b> and 'Here For You' schemes is greater than 60%.



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3.3	Companies should train their staff to spot potential requirements for extra help, even when a customer has not previously declared it.	Compliant	Our employees are our greatest asset in delivering exceptional customer care and we are investing in training designed to equip our teams with the skills and knowledge necessary to identify and support customers who may need extra help. We want to make sure that every interaction with our customers is respectful, informed, and genuinely supportive.         Our initiatives to date:       Specialist training – We've provided specialist training to support our customer facing office teams, so they're able to better support customers going through difficult situations, such as a bereavement or mental health illnesses.         Training Academy – We've launched a new training module within our Training Academy to provide vulnerability training new customer service advisors.         Dementia Friends – 166 colleagues have completed Dementia Friendly training.         Incident training – In January of this year, we took part in a joint exercise with Affinity Water to test our approach to providing alternative water in the event of a water emergency. A number of colleagues from across the business took part, and as part of this we also practised delivering bottled water to volunteers' homes to simulate real life deliveries to our Priority Services Register customers.         Our medium to longer term plans:       Expanding vulnerability training – We will roll out vulnerability training to all customer facing colleagues, including our field teams. We'll also make sure this extends to all our suppliers who work with us, so we are consistent in our approach.         Specialised training – We will work with our partners to continue to deliver specialised training across our business, making sure we cover the full and diverse range of vulnerabilities where possible. We'll also develop a vulnerability training skills matrix	We will track and monitor the number of our colleagues completing vulnerability training through our Learning Management System.	No challenges in meeting this expectation.	100% of customer facing colleagues will have completed vulnerability training by 2030.



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3.4	Companies should actively consider how they can reduce communication burdens on customers who need extra help; this could include establishing data sharing arrangements with partner organisations.	Compliant	<ul> <li>Data sharing helps us identify customers who may need our support, and it also helps us to reduce communication burdens associated with multiple disclosures. Through these agreement's we're able to receive (and in some cases also the share) information about our customers who should be on the Priority Services Register. By having this information we can also identify if a customer might benefit from one of our financial support schemes, such as Water Support.</li> <li>Our initiatives to date:</li> <li>Data shares – We've established data sharing agreements with UK Power Networks, and Southern Water with our customers' consent, so they don't have to give the same information to multiple organisations.</li> <li>Direct referrals – We're proud to have set up relationships with many trusted partners, including Age UK Sutton and Epsom &amp; Ewell Citizens Advice. By receiving direct referrals from our trusted partners, we're able to automatically add our customers to the Priority Services Register (or one of our other support schemes) without the need for them to complete an application form.</li> <li>Our plans in the short term:</li> <li>Historical data share – We are working with UK Power Networks to share all historical customer data.</li> <li>Open data – Open data allows our customers, community and stakeholders to access information about water quality, usage, and management practices and performance, promoting transparency. It helps the public and regulatory organisations to hold government agencies and utilities, including ourselves, accountable for performance and decision-making. Alongside the rest of the industry, we will be sharing data about our support schemes.</li> <li>Our medium to longer term plans:</li> <li>Expanding data shares – We plan to increase our customer sharing data arrangements, and we'll do this by introducing further data share agreements with energy suppliers, housing associations, resilience forums and community groups across all our supply region. We will also explore an opportun</li></ul>	As per Expectation 1.1, we will monitor and track our progress through our customer and stakeholder challenge groups.	There may some minor challenges in 'matching' customer details across different data platforms, which may lead to some manual work before data sharing can commence. In addition, on some occasions we need to provide additional support to smaller community based organisations when setting up data share agreements.	We will proactively seek data sharing opportunities with energy suppliers, housing associations, resilience forums and community groups across all our supply region. We will fulfill our obligations under existing data share agreements.



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4.1	Companies should take appropriate steps to record customers' extra help needs. These records should be held securely and in line with wider data protection requirements.	Compliant	Once we become aware that one of customers requires extra help, we capture and store this information securely within our customer billing system. By having this information, we are then able to tailor our support accordingly. Our initiatives to date: Our customer billing platform (Salesforce) offers several tools to capture and store information about our customers' extra help needs securely and compliantly. These include: Secure login – This is protected with a multi factor authentication. Data Encryption – The data is we hold is encrypted. An Audit Trail – We have the ability to track all data access and modifications, providing a record of who accessed the information and when. Access Controls – We have set up granular permission controls restrict access to customer data based on user roles and profiles. Regular Security Audits – The platform we use (Salesforce) undergoes regular independent security audits to ensure its platform meets the highest security standards. Cyber awareness training – We have completed company wide cyber awareness training. We also have existing procedures and polices in place in the event of a data breach, and these are continually reviewed.	<ul> <li>We use a range of technical tools to manage and monitor access. These are outlined below;</li> <li>Salesforce utilises a multi-layered security approach to prevent data leaks.</li> <li>Salesforce provides a suite of technical tools for managing and monitoring user access. This allows administrators to define precise permissions for each user, ensuring they can only access the data they need for their specific role.</li> <li>System administrators hold the keys to the data kingdom. Salesforce enforces secure access procedures for administrators, making it harder for unauthorised individuals to gain access to sensitive information.</li> <li>Field-Level Security enables administrators to restrict access to specific data fields within a record. This ensures that users can only see the information relevant to their tasks, further minimising the risk of exposure.</li> </ul>	Through the evolving cyber landscape, attackers are developing new ways to exploit systems, steal data, and bypass defences. This constant evolution means staying ahead of the curve is a challenge. Phishing scams and other social engineering tactics are also becoming more sophisticated. Hackers prey on human trust and emotional manipulation. We employ a team of experts whose sole purpose is to put strategies in place to keep information about our customers safe and secure.	Zero data breaches.



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4.1 con	t.	Compliant	Our future plans: Through Salesforce, we will deliver on-going improvements to our customers billing platform. We work closely with them, and our wider business, to ensure the needs of customers are satisfied.	<ul> <li>Salesforce automatically logs user activity with audit trails, creating a detailed record of who accessed what data and when.</li> <li>These audit trails provide valuable insights in case of suspicious activity or a potential breach.</li> </ul>		
4.2	Companies' records should be reviewed regularly to ensure they are up to date.	Compliant	A key part of our strategy is keeping details and information about our customers' needs up to date. This is particularly important for customers who may require temporary help, such as support during a short term illness, and therefore may not need to be our the <b>Priority</b> <b>Services Register</b> long term. <b>Our initiatives to date:</b> <b>Biannual check-ins</b> – We have introduced a biannual check with our customers who are on the <b>Priority Services Register</b> each year to check if their details are up to date, or if their situation has changed. <b>Regular information checks</b> – We regularly check a customers' information is up to date each time they contact a member of our Customer Care or Extra Care Team - our advisors use a 'data completeness bar' on our customer billing system as a way to identify if further contact information - such as a mobile number - is needed. Such information is particularly important in event of an incident. If the customer is shown to be on the <b>Priority Services</b> <b>Register</b> , a further check-in is completed to see if the customer needs anything else from us. <b>Our medium to longer term plans:</b> <b>Tailoring our biannual check ins</b> – We will continue to proactively 'check-in' with our customers on the <b>Priority Services Register</b> every two years, but we'll tailor the way we communicate with customers with lifelong conditions versus those who may have shorter term extra help requirements. We will also tailor the approach to the 'check-in' depending on the customers needs' code and communication preferences. For those with transitory help requirements (such as short term illnesses) we will set up a process to complete more regular check-ins as we recognise some customers may only need our support for a shorter time period. <b>Innovative check-ins</b> – We'll explore opportunities to complete check-ins through other key customer touchpoints, such as through our customer facing portal MyAccount. <b>Nominee contacts</b> – We'll get in touch with any nominee contacts listed on the customer account when checking if	<ul> <li>We have a monitoring mechanism in place which regularly reports on the start, end and review date of customers on our <b>Priority Services Register</b>, to keep track of who we need to contact (and when).</li> <li>We report on our performance through our Customer Committee and customer challenge group, the Customer Scrutiny Panel.</li> </ul>	We are reliant on our customers providing us with accurate information when we contact them to check their details are to date. This also extends to having accurate information about any nominee contacts listed on our customer accounts.	We will contact 90% of customers on our Priority Services Register every two years.



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4.3	Companies should consider how their records of customers' needs can be designed in a way that can help deliver wider benefits to their customers; for example, reducing communication burdens for customers through data sharing.	Compliant	<ul> <li>Whilst the industry level and indeed cross sector conversation and work regarding aligning and centralising Priority Services Register is ongoing, we have been considering how we can design our records of needs with the aim of reduce the communication burden on customers.</li> <li>Our initiatives to date:</li> <li>Aligning needs codes – We have aligned our 'needs codes' to the industry, making sure our records are easy accessible and close to industry standard as possible.</li> <li>System development – We have developed our system so that our customer facing advisors are alerted to a customer who is on our Priority Services Register as soon as they have passed security and gain access to their records, meaning they are aware of the kind of support the customer needs and know not to promote the service.</li> <li>Revalidation – As covered in Expectation 4.2, we revalidate our customers details every two years to capture and change any additions to needs codes or removals would then be communicated to our partners in accordance with our data share agreements. This means the data we hold, is as up to date as it can be.</li> <li>Our future plans:</li> <li>Data capture – We will continue to keep the records of our customers up to date through our activities as outlined in Expectation 4.2.</li> <li>Industry cross collaboration – We are part of the industry working group to share best practise around data capture, data sharing and exception management.</li> </ul>	<ul> <li>As referenced in Expectation 4.2, we will regularly check the information about our customers is accurate and up to date through our data revalidation processes.</li> </ul>	We know from our customer and stakeholder engagement that not everyone openly discloses information about their situation or specific needs. This can be particularly the case for customers in harder to reach communities. The result is we may not always have accurate and up to date information about our customers' needs.	Customers on our Priority Services Register have an average satisfaction score greater than 8 out of 10. We will contact 90% of customers on our Priority Services Register every two years.



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4.4	In designing their approach to recording and, where relevant, sharing customer vulnerability data, companies should clearly explain to customers how their data will be used, including any choices available to them. Companies should take steps to understand how their customers who need extra help feel about the use of their data.	Compliant	We understand the importance of making sure our customers are in control of how their data is used and we take our responsibility in communicating their options very seriously. Our initiatives to date: Data sharing options – All our Priority Service Register touchpoints (including our webforms and system applications used by our agents) have clear consent options which explain how we will hold, use and share our customers sensitive data. Substantial Public Interest (SPI) – To facilitate the sharing of data with our network distribution operators we moved to an SPI data model to facilitate the sharing of customer data. Although at this stage we only share new applications, changes or removals, we sent a communication to all customers on our existing Priority Services Register to explain the change and gave them the option to opt out. To do this we collaborated with Thames Water to align our letters as closely as possible. Revalidation – As covered in Expectation 4.2, we recognise that people's views on how we use their data may change over time. This is why we make sure that we provide information on accessing our privacy statement when our Priority Services Register customers pass through the biannual revalidation process. Our Privacy statement – Although we provide information on the basis upon which we hold use and share Priority Services Register data on the relevant pages of our website a detailed explanation can be found in our Privacy Statement. Customers are given a link to the statement on our corporate website Priority Services Register page and across our external communication channels. Our plans in the short term: Enhancing MyAccount – We're currently developing our online customer portal so customers can apply for the Priority Services Register. Improving the customer journey – We're planning to review the end to end Priority Services customer journey, and as part of this we'll focus on the efficacy of our 'consent' model to make sure it's easy to understand and leads to customers making a choice t	<ul> <li>As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.</li> <li>We will track the number of contacts or complaints we have receive about how our customers' data on the Priority Services Register has been used, and will be used.</li> </ul>	We need to be mindful that customers may not always see our communications about how their data will be used. We need to make sure this information is as visible as possible throughout the customer journey, and is accessible to range of audiences.	Zero complaints from our customers on the <b>Priority Services</b> <b>Register</b> about how their data is used.



## Key: Short term: Next 12 months | Medium to long term: 2025 to 2030

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5.1	Companies should develop and maintain a vulnerability strategy setting out how they plan to support the extra help needs of their customer base.	Compliant	We're fully committed to supporting customers who need extra help, both now and in the future. We have produced a draft vulnerability strategy, which has been developed using customer and stakeholder feedback, as outlined in Expectation 2.3. As per the guidance, we will publish our draft plans on the our website at the end of June 2024. Having referred to various accessibility guides when designing it, our draft strategy document will be accessible to a range of audiences. <b>Our plans in the short term:</b> We will continue to seek customer and stakeholder feedback on our draft plans once our draft strategy has been published, and we'll compare it against the PSR Standards when these are released in Autumn 2024. We'll continue to refine our plans before publishing our final vulnerability strategy at the end of June 2025.	<ul> <li>As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.</li> <li>We will await feedback from our regulator Ofwat, on how well we've addressed this expectation, including any further areas to focus on.</li> <li>We will review our plans against the new PSR Standards once these are released, to ensure compliance.</li> </ul>	We will review our draft plans once our we've received feedback on our business plan for the next business period (PR24).	We will consider all our key metrics when measuring success of our vulnerability strategy. These include: Customers on our <b>Priority Services</b> <b>Register</b> have an average satisfaction score greater than 8 out of 10. More than 80% of customers receiving support, feel that SES Water's extra support services are 'helpful. The awareness of our <b>Priority Services</b> <b>Register</b> and 'Here For You' schemes is greater than 60% We will complete vulnerability training for all our customer facing colleagues.



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5.2	Companies should take steps to understand the likely underlying requirements for extra help in their areas.	Compliant	As the number of the customers on our schemes increases, it's critical that our support schemes remain fit for purpose and have the necessary funding and focus to continue to support our customers with extra help needs. <b>Our initiatives to date:</b> <b>Customer insight</b> – We supplement our operational and system data with insight from the consumer data company, CACI. This gives us demographic information about our customers and their day to day lives, such as financial circumstances and difficulties, wellbeing and general attitudes. This insight improves our understanding and identification of customers who need extra support, so we can better target our proactive communication campaigns. <b>Monitoring future developments</b> – We currently use data from a variety of public sources, such the Office of National Statistics to understand the future trends, such as predicted population growth in our region. We also work closely with our partners to understand future demand in their respective areas. <b>Our future plans:</b> <b>Industry sub group participation</b> – We're pleased to be a member of the vulnerability sub group, and look forward to collaborating with other water companies in this area by sharing best practice and providing additional insight to meet this minimum expectation. <b>Monitoring future developments</b> – We'll continue follow national and local developments that may impact the demand (both short term or longer term) for our services. <b>Horizon scanning</b> – We will stay ahead of industry trends by working closely with other support organisations (including our partners) across our supply area, utilising their expert knowledge, so we understand emerging vulnerability trends, and best practise both within and outside the water industry <b>Predicting future behaviour</b> – As outlined in Expectation 1.4, we'll use our operational and system data (such as payment or contact patterns) to help predict customer behaviour. We will use this insight to determine future initiatives to bridge any gaps in our service offering. <b></b>	<ul> <li>As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.</li> <li>We will await feedback from our regulator Ofwat, on how well we've addressed this expectation, including any further areas to focus on.</li> </ul>	Whilst we have the data to show the likely help needs of our customer today, we need further analysis to show (at a national and regional level) the potential needs of our customers in the future, recognising that situations can change.	We will continue to refresh our customer data each year.