



Final Regulatory Reporting Assurance Plans 2020/21

March 2021



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About this document

The purpose of our Regulatory Reporting Assurance Plans (“Assurance Plans”) is to provide evidence for our customers and stakeholders that we have processes and procedures in place to reduce the risk of inaccurate or incomplete external reporting; and are dealing appropriately with any risks identified in our Statement of Risks, Strengths and Weaknesses.

This is one of three documents that we publish during the year to determine and report on our levels of information assurance and how we meet Ofwat’s Company Monitoring Framework ¹ (“CMF”) and Information Notice 19/04 ².

These documents are:

- [Statement of risks, strengths, and weaknesses \(“Statement”\) and consultation on our draft assurance plan \(“Draft plan”\)](#) ³ - our assessment highlighting areas of reporting risk that we use to inform our draft plan;
- [Final assurance plan \(“Final plan”\)](#) - detailing the process and procedures that we have in place to minimise the risk of inaccurate or unreliable external reporting (this document); and
- [Data assurance summary](#) ⁴ - documenting the assurance activities undertaken in the year.

¹ The latest iteration of Ofwat’s Company Monitoring Framework can be found on their website through the following link: <http://www.ofwat.gov.uk/publication/company-monitoring-framework-final-position/>

² Ofwat are not publishing any further CMF assessments however this information notice expects companies to continue to adopt as a minimum the requirements established by a company in the ‘targeted’ category <https://www.ofwat.gov.uk/wp-content/uploads/2019/08/CMF-information-notice.pdf>

³ The latest version of the Statement and Draft Assurance Plans: <https://www.thameswater.co.uk/media-library/home/about-us/investors/our-results/current-reports/statement-of-reporting-risks-strengths-and-weaknesses.pdf>

⁴ The latest version of the Assurance summary: <https://www.thameswater.co.uk/media-library/home/about-us/investors/our-results/current-reports/data-assurance-summary-2019-20.pdf>

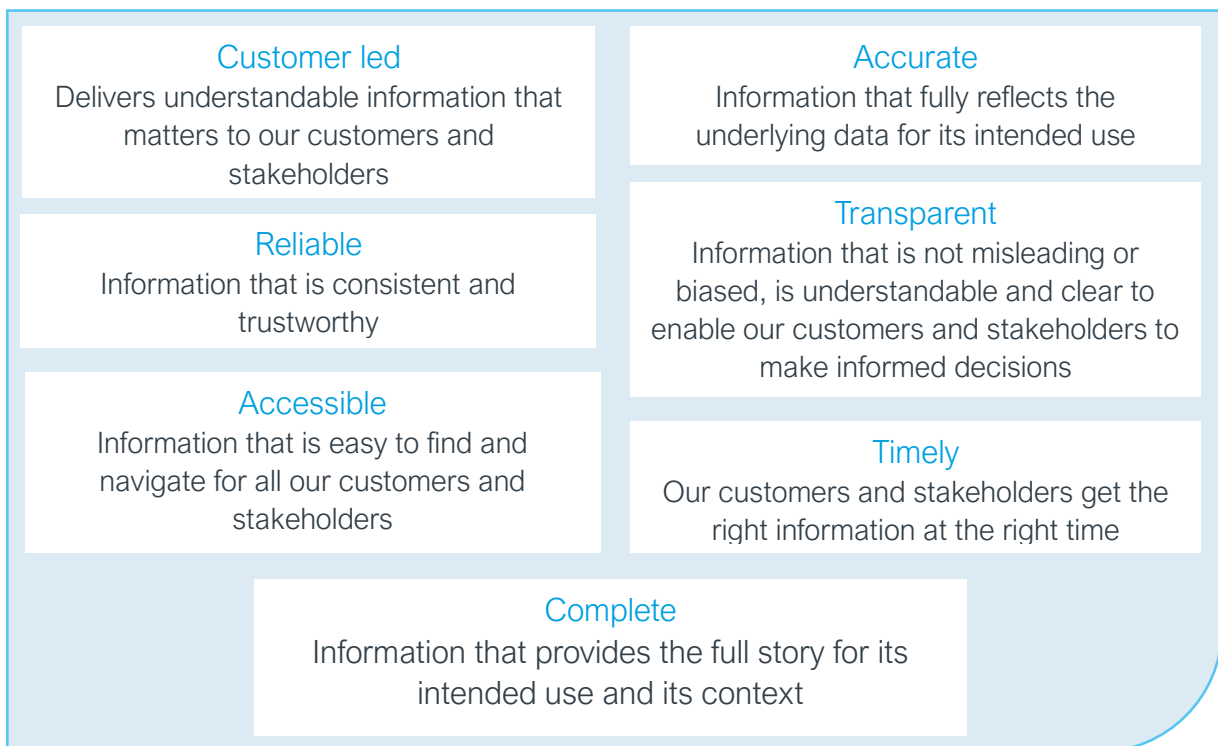
Background

In 2015, Ofwat published the Company monitoring framework (“CMF”) for the five-year regulatory period 2015-20 (“AMP6”). The purpose of the CMF was to ensure that we provide customers and stakeholders with information that is easy to understand, provides transparency and helps to build trust and confidence in our regulatory reporting.

Although Ofwat are no longer conducting CMF assessments, within their information notice 19/04 they expect continued compliance to maintain improvements in reporting and comparability of information across the sector.

To achieve the goals of the CMF, we must ensure that our regulatory reporting has each of the qualities shown in figure 1.

Figure 1: Information qualities



Source: Thames Water

Our commitment to customers and stakeholders

Our customers are at the heart of our business. We want to keep you informed about how we are performing – and expect to perform throughout the year and what it means to you.

We commit that we will:

- Report accurate and reliable information and where we identify any issues:
 - Address the issue in a timely manner; and
 - Engage with our customers and stakeholders.
- Provide our customers and stakeholders with a clear and transparent explanation of any performance issue;
- Where we are at risk of failing to meet our committed level of performance, explain how this:
 - Affects customers; and
 - Issue will be addressed.
- Review our Statement and assurance plans regularly to address and mitigate any areas of concern;
- Prepare and publish our Statement and Draft plan by 30 November each year, which will include the details of our customer and stakeholder consultation and our risk-monitoring framework;
- Ensure our customer challenge group (“CCG”) and our customers are given the opportunity to comment on our plans by e-mail or post;
- Respond appropriately to comments on the above and incorporate and feedback received into the Final assurance plan;
- Publish Final assurance plan by 31 March each year and ensure that the risks identified in the Statement are addressed; and
- Publish our Data assurance summary in summer 2021 to outline the results of our regulatory reporting assurance processes throughout 2020-21, with specific focus on the results of assurance over our reporting within the Combined Annual Report and Annual Performance Report.



Engagement with customers and stakeholders

In November 2020 we published our Draft plan for consultation. Our customers and stakeholders were given the opportunity to comment on our plans by e-mail or post.

We did not receive any feedback.

Why assurance is important to us

Assurance consists of all the checks and balances used to ensure that the regulatory data we publish is robust, trustworthy and exhibits all the qualities shown in figure 1.

By ensuring that all the data we publish has these qualities, customers and other stakeholders can have confidence and trust in the information that we provide.

We report on our performance to Ofwat and explain to customers what is being delivered in return for the money we collect through bills. It is imperative that we take full responsibility for the integrity of the data we collect, analyse, publish, and submit.

Our assurance framework

Our assurance framework is designed to align with Ofwat's expectations and the strategic direction of our Board for high quality submissions.

Ofwat provide guidance on their assurance expectations/requirements for certain submissions and rely on us making our own judgement for others.

It should be noted that, during the year, we will receive ad hoc requests for information from Ofwat (and other Regulators.) In these instances, we use our assurance approach to determine the assurance checks and balances that need to be in place prior to submission to ensure that our response is on time and of quality.

All publications/submissions noted in this report are subject to risk assessment.

The risk assessment considers aspects such as customer impact, financial impact, complexity, and historical errors. The level of assurance undertaken is guided by results of this risk assessment. Higher risk submissions will have more checks and balances to ensure they have the qualities listed in figure 1.

Changes from our 2020-21 Draft plan

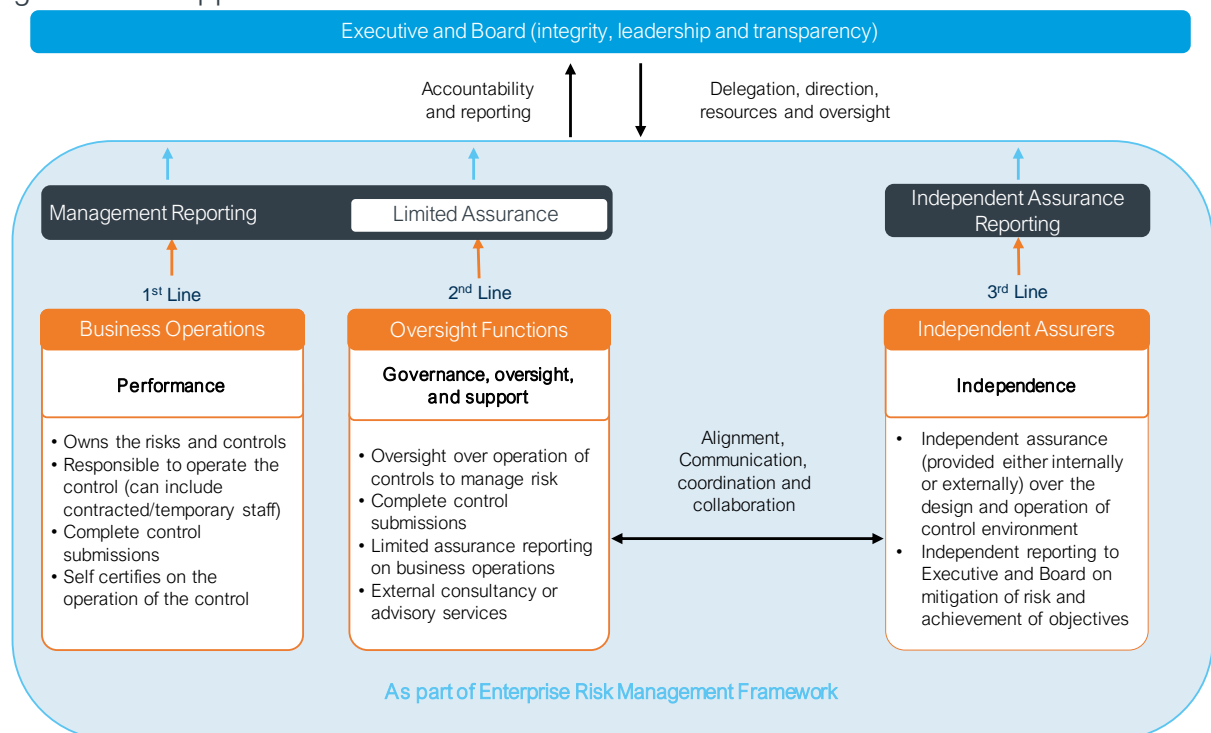
Our Final plan is unchanged from the draft that we issued in November 2020 except for:

- Annual performance report: The external assurance requirements are being reviewed (and re-designed, if appropriate) to ensure alignment with changes to the regulatory guidelines and learnings from the prior year.
- Competition Act (S18 investigation using provision of information under S26): The scope of the reporting requirements has been expanded to include ongoing ad hoc submissions in addition to the formal responses to requests for information. These submissions are subject to the same risk assessment as other submissions.
- Leakage reporting: Our plan has been updated to reflect confirmation from Ofwat in January 2021 of the closure of some of the undertakings. Additionally, Ofwat confirmed that they "would be comfortable for Thames Water to use one set of third party assurance to satisfy the two different regulatory requirements relating to its Condition P certificate."⁵

Our approach to assurance

Our approach to assurance is illustrated in figure 2. It includes three lines of assurance which provide continuous and reliable assurance on the information we report and allows us to effectively manage reporting risks.

Figure 2: Our approach to assurance



Source: Thames Water

⁵ Extract from letter from Ofwat, Director of Enforcement to Thames Water dated 12 Jan 21

Our Final plan for 2020-21

The results of the application of our assurance approach to our external submissions and publications for 2020-21 are detailed below.

Table 1: Our Final plan

External submissions and publications	Risk assessment	First line		Second line			Third line			Approval			
		Submission plans	Method statements	Check on quality of information	Senior manager approval	Internal/external		Oversight functions/peer review	Customer/stakeholder involvement	Internal independent assurance	External independent assurance	Executive approval	Board approval (including sub-committees)
						Data review	Process review						
Interim financial statements	H	✓	✓	✓	✓			✓	✓		✓	✓	
Annual financial statements	H	✓	✓	✓	✓	✓		✓	✓		✓	✓	
Annual performance report	H	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	
Statement of risks, strengths & weaknesses, and draft regulatory reporting assurance plan	M	✓		✓	✓			✓	✓		✓	✓	
Final regulatory reporting assurance plans	M	✓		✓	✓			✓	✓		✓	✓	
Data assurance summary ⁽ⁱ⁾	M	✓		✓	✓			✓	✓		✓	✓	
Accounting methodology statement	M	✓		✓	✓	✓		✓			✓	✓	
Debt prospectus	H	✓		✓	✓			✓			✓	✓	
Bioresources market info	M	✓	✓	✓	✓	✓	✓	✓	✓		✓		
Water resources market info	M	✓	✓	✓	✓	✓	✓	✓	✓		✓		
Charges scheme	H	✓	✓	✓	✓			✓	✓	✓	✓	✓	
Leakage reporting (S19)	H	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	
Competitions Act (S26)	H	✓	✓	✓	✓	✓		✓		✓	✓		
National framework for water resources	H	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	
Conditional allowances	H	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	

On the following pages we provide more detail on how we plan to assure high risk assessed submissions and publications.

⁽ⁱ⁾The data assurance summary is not explicitly presented to the Board and Executive team. The detail of this report is shared within the year end reports provided by our external assurance provider, currently PwC

Our assurance plan for high risk assessed submissions and publications

Interim financial statements assurance plan

	First line				Second line				Third line			Approval	
	Submission plans	Method statements	Check on quality of information	Senior manager review	Data review	Process review	Expert review	Oversight functions/peer review	Customer / stakeholder involvement	Internal independent assurance	External independent assurance	Executive approval	Board approval
Core assurance activities	✓	✓	✓	✓				✓	✓		✓	✓	✓
Why is this a high risk area?	Our financial statements are relied on by our customers, shareholders and stakeholders to assess the financial health and overall management of our business. They are complex and require combining information from multiple systems and business areas.												
More information	What will we do												
Check on quality of information	Internal reviews will be performed to determine whether information included in the interim financial statements is consistent, accurate and complete.												
Oversight functions	Peer reviews will be undertaken that consider whether minimum disclosure requirements are being met and where disclosure improvements can be made.												
Customer and stakeholder involvement	We will continue to use feedback from our customers and stakeholders ensuring that we are reporting on areas that are important to our customers in a clear and transparent way.												
External independent assurance	Our external auditor, PwC, will perform interim review procedures over our interim financial statements and provide a review opinion.												
Approval	Our executive team, Audit, Risk & Reporting Committee (“ARRC”) and our Board will review and approve the interim financial statements prior to publication, acknowledging feedback from the external assurance process.												

Annual
financial
statements
assurance plan

	First line				Second line				Third line			Approval	
	Submission plans	Method statements	Check on quality of information	Senior manager review	Data review	Process review	Expert review	Oversight functions/peer review	Customer / stakeholder involvement	Internal independent assurance	External independent assurance	Executive approval	Board approval
Core assurance activities	✓	✓	✓	✓	✓			✓	✓		✓	✓	✓
Why is this a high risk area?	Our financial statements are relied on by our customers, shareholders and stakeholders to assess the financial health and overall management of our business. They are complex and require combining information from multiple systems and business areas.												
More information	What we will do												
Check on quality of information	Internal reviews will be performed to determine whether information included in the interim financial statements is consistent, accurate and complete.												
Oversight functions	Peer reviews will be undertaken that consider whether minimum disclosure requirements are being met and where disclosure improvements can be made.												
Customer and stakeholder involvement	We will continue to use feedback from our customers and stakeholders ensuring that we are reporting on areas that are important to our customers in a clear and transparent way.												
External independent assurance	Our external auditor, PwC, will perform an audit over our annual financial statements and provide an audit opinion.												
Approval	Our executive team, Audit, Risk & Reporting Committee (“ARRC”) and our Board will review and approve the annual financial statements prior to publication, acknowledging feedback from the external audit process.												

Annual
performance
report
assurance plan

	First line				Second line				Third line			Approval	
	Submission plans	Method statements	Check on quality of information	Senior manager review	Data review	Process review	Expert review	Oversight functions/peer review	Customer / stakeholder involvement	Internal independent assurance	External independent assurance	Executive approval	Board approval
Core assurance activities	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Why is this a high risk area?	Our annual performance reports are relied on by our customers, Ofwat and stakeholders to assess the performance of our business. The APR shows our ability to deliver on our commitments, compliance with our legal and regulatory obligations and enables industry wide comparison. The APR is a complex document pulling information together from multiple sources, systems and business areas.												
More information	What we will do												
Method statements	Method statements will be prepared by responsible business owners which summarise how the regulatory numbers have been determined and how they satisfy Ofwat requirements. Where judgements have been made, they will be clearly documented.												
Check on quality of information	Internal reviews will be performed to determine whether numbers have been prepared in line with Ofwat guidance and commentary is transparent, focussing on the areas that customers are interested in and provide enough narrative around performance.												
Oversight functions	Peer reviews will be performed to ensure numbers presented and associated commentaries are in line with expectations.												
Internal independent assurance	The internal Risk, Audit and Assurance Team will perform assurance procedures over low risk assessed lines in sections 3 and 4. These procedures will be identical to those performed by PwC on the high and medium assessed lines. The team also provide quarterly assurance over the Directors' Ring Fencing Certification (Condition P).												
External independent assurance	Our external auditor, PwC, will provide an audit opinion over sections 1 and 2 of our Annual Performance Report and will perform assurance procedures over high and medium risk assessed lines in sections 3 and 4. PwC, will also perform assurance procedures over our Director's Sufficiency of Resources Certificate ⁶ . Their review will include consideration of the appropriateness of policies and the output of their work will be in the form of a 'review and recommend' report on our Director's ability to sign the certificate. The final assurance requirements are being designed to ensure alignment with the changes to the RAG for AMP7.												
Approval	Our executive team, Audit, Risk & Reporting Committee ("ARRC") and our Board will review the Annual Performance Report prior to publication, acknowledging the feedback from the external assurance process.												

⁶ This is in line with the Section19 undertakings, following Ofwat's investigation into our leakage performance

Debt
prospectus
assurance plan

	First line				Second line				Third line			Approval	
	Submission plans	Method statements	Check on quality of information	Senior manager review	Data review	Process review	Expert review	Oversight functions/peer review	Customer / stakeholder involvement	Internal independent assurance	External independent assurance	Executive approval	Board approval
Core assurance activities	✓		✓	✓				✓			✓	✓	✓
Why is this a high risk area?	The debt prospectus is used by potential debt providers to ensure they have the information they need. This includes how debt is raised, payment terms and information about the company. It must be prepared in line with stock exchange requirements for raising public debt.												
More information	What we will do												
Check on quality of information	Internal reviews will be performed to consider completeness and accuracy and ensure consistency of information.												
Oversight functions	Peer reviews will be performed to ensure consistency of information.												
External independent assurance	Our external auditor, PwC, will perform assurance procedures over our debt prospectus, ensuring that information incorporated in the debt prospectus is consistent with other information previously published, e.g. latest financial results. Additionally, they will gain an understanding of performance between that latest published information and a later 'cut-off' date, closer to the publication of the prospectus.												
Approval	Our Executive Team and Board will review and approve the debt prospectus prior to publication.												

Charges
scheme
assurance plan

	First line				Second line				Third line			Approval	
	Submission plans	Method statements	Check on quality of information	Senior manager review	Data review	Process review	Expert review	Oversight functions/peer review	Customer / stakeholder involvement	Internal independent assurance	External independent assurance	Executive approval	Board approval
Core assurance activities	✓	✓	✓	✓				✓	✓	✓		✓	✓
Why is this a high risk area?	There are three charges schemes which customers, retailers, developers and stakeholders rely on. These are our wholesale charges scheme, retail charges scheme and new connections charges scheme. The charges schemes are subject to both regulatory guidance and statutory responsibilities (e.g. Competition Act compliance).												
More information	What we will do												
Method statements	Method statements are prepared by the relevant business owner.												
Internal independent assurance	The Internal Audit will perform checks to increase confidence in the charges schemes publications.												
Approval	Our Executive Team and Board will review and approve the charges schemes prior to publication.												

Leakage reporting

Water Industry Act section 19 undertaking assurance plan

	First line				Second line				Third line			Approval	
	Submission plans	Method statements	Check on quality of information	Senior manager review	Data review	Process review	Expert review	Oversight functions/peer review	Customer / stakeholder involvement	Internal independent assurance	External independent assurance	Executive approval	Board approval
Core assurance activities	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓
Why is this a high risk area?	Under section 19 of the Water Industry Act we agreed to a formal undertaking to improve our leakage performance. Failure to meet the requirements of the undertaking could lead to enforcement action. The undertaking also prescribes the appointment of both an independent monitor and obtaining third party independent assurance over compliance. In January 2021, we reviewed our reporting requirement following confirmation from Ofwat that some of the undertakings had been closed.												
More information	What we will do												
Oversight functions	A team to monitor implementation and/or progress against key actions/points raised in the published report has been mobilised.												
Customer and stakeholder involvement	Our required reporting from the undertaking response took into account the feedback received from both customers, CCG and stakeholders, for example, we will continue to make CCG aware of our monthly leakage reporting as it is published on our website.												
External independent assurance	In line with the requirements of the undertaken, we engaged an independent monitor to certify our monthly leakage reports and an independent external assurance provider to undertake a six-monthly review of compliance with the undertaking. In addition, the independent monitor has been provided with access to technical assurance support for the calculation of leakage performance.												
Approval	The Executive Team and Board approved the six-monthly report prior to submission. The monthly leakage reporting on our website will continue to be approved by an Executive (or Senior Leadership Team member) prior to publication.												

Competition Act 1998

Section 18 investigation using provision of information under Section 26 assurance plan

	First line				Second line				Third line			Approval	
	Submission plans	Method statements	Check on quality of information	Senior manager review	Data review	Process review	Expert review	Oversight functions/peer review	Customer / stakeholder involvement	Internal independent assurance	External independent assurance	Executive approval	Board approval
Core assurance activities	✓	✓	✓	✓	✓		✓	✓		✓		✓	
Why is this a high risk area?	In June 2019 Ofwat used powers granted in the Competition Act 1998 to open an investigation of the Company's behaviour in the retail market. To date, the Company has produced 3 responses, as well as additional information on an ad hoc basis. These responses are high risk due to, among other considerations; complexity, data requirements, consistency between responses and legal considerations.												
More information	What we will do												
Method statements	Method statements are prepared by the relevant question owner.												
Check on quality of information	Internal reviews will be performed to determine whether numbers have been prepared in line with Ofwat's request and accompanying narrative is transparent and complete.												
Oversight functions	Peer reviews will be performed to ensure consistency of information.												
Internal Independent assurance	The internal Risk, Audit and Assurance Team will perform assurance procedures over all areas including the preparation of data, completeness and consistency of response.												
Approval	A member of the Executive Team approves the report prior to submission.												

National
framework for
water resources
assurance plan

	First line				Second line				Third line			Approval	
	Submission plans	Method statements	Check on quality of information	Senior manager review	Data review	Process review	Expert review	Oversight functions/peer review	Customer / stakeholder involvement	Internal independent assurance	External independent assurance	Executive approval	Board approval
Core assurance activities	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓
Why is this a high risk area?	The National framework for water resources was published in March 2020 and provides the strategic cross company and regional direction to long term water resource planning built on a shared vision ⁷ . Submissions include Strategic Resource Options (“SRO”), Water Resources South East (“WRSE”), Water Resources Management Plan (“WRMP”) and the Drought Plan.												
More information	What we will do												
Oversight functions	A team will monitor implementation and/or progress against all aspects of the submissions												
Customer and stakeholder involvement	Our submissions will be informed by feedback received from both customers and stakeholders.												
Internal independent assurance	The internal Risk, Audit and Assurance Team will perform assurance procedures to ensure that any joint submission with other Water Companies meets our assurance standards.												
External independent assurance	Third party assurance providers will be engaged where the need is identified through our risk assessments. For example, this may include assurance on technical aspects of the submissions.												
Approval	The Board will be asked to provide a Board Assurance Statement to support most of these submissions. All final submissions will be approved to, at least, Executive level.												

⁷ The detailed requirements and interdependencies are evolving over time and we anticipate that our assurance plan will need to continuously develop to ensure alignment

Conditional
allowances
assurance plan

	First line				Second line				Third line			Approval	
	Submission plans	Method statements	Check on quality of information	Senior manager review	Data review	Process review	Expert review	Oversight functions/peer review	Customer / stakeholder involvement	Internal independent assurance	External independent assurance	Executive approval	Board approval
Core assurance activities	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓
Why is this a high risk area?	As part of the Final Determination for AMP7, Ofwat have provided us with two conditional allowances to investigate and mitigate risks to the resilience of water supplies in London and to improve the performance of the London water network. In one of these cases, the conditional allowances will be returned to customers unless a number of conditions are met, including a commitment from Thames Water’s shareholders to make a substantial contribution to the cost of the improvement works. Approval must be granted at each of five gates during AMP7.												
More information	What we will do												
Oversight functions	A team will monitor implementation and/or progress against all aspects of the submissions.												
Customer and stakeholder involvement	Our submissions will be informed by feedback received from both customers and stakeholders.												
Internal independent assurance	The internal Risk, Audit and Assurance Team will perform assurance procedures over all areas including the preparation of data, completeness and consistency of response.												
External independent assurance	Third party assurance providers have been engaged by Ofwat to provide technical assurance and act as advisors, focusing on providing the best outcomes for customers and the environment.												
Approval	The Board will be asked to provide a Board Assurance Statement to support these submissions.												

Appendix 1 Overview of external publications/submissions

Except for the six-monthly section 19 leakage compliance reporting which is provided to Ofwat only, all documents below are published on our website.

Submission /publication	Purpose of submission/publication	Requirement	Frequency
Interim financial statements	Half-yearly financial statements and associated commentary summarising performance for the first six months of the financial year (1 April to 30 September)	Legal/statutory	Annual
Annual financial statements	Annual financial statements and associated commentary summarising performance for the financial year (1 April to 31 March)	Legal/statutory	Annual
Annual Performance Report (APR)	Annual regulatory accounts summarising performance for the year prepared in accordance with Ofwat's Regulatory Accounting Guidelines (RAGs). The APR also includes, but is not limited to, the Directors Sufficiency of Resources Certificate, and the Risk & Compliance Statement,	Regulatory	Annual
Statement of risks, strengths & weaknesses and draft regulatory reporting assurance plans	CMF requirement: overview of our reporting/targeted risks for certain regulatory/legal submissions/publications and proposed assurance procedures over these	Regulatory	Annual
Final regulatory reporting assurance plans	CMF requirement: summary of how we will assure our regulatory/legal submissions/publications	Regulatory	Annual
Data assurance summary	CMF requirement: summary of results of our assurance plans	Regulatory	Annual
Accounting methodology statement	RAG requirement: overview of how we have allocated costs in our APR	Regulatory	Annual
Debt prospectus	Document providing an overview of the group, performance and risks for debt investors	Legal	Annual
Bioresources market information	Information to inform others who wish to participate in a competitive market about our bioresources activities	Regulatory	Annual
Water resources market information	Information to inform others who wish to participate in a competitive market about our water resources activities	Regulatory	Annual
Water resources management plan	Overview of how we intend to ensure we have adequate water resources to deliver our services to customers in the future	Regulatory	Every five years
Charges scheme	An overview of our charges	Regulatory	Annual
Leakage reporting (Water Industry Act Section 19 undertaking)	To ensure we meet our leakage obligations, we have made a legal commitment to Ofwat to put in place robust systems and processes and keep customers informed of our performance on a regular basis.	Regulatory	Monthly leakage reporting /Bi-annual compliance reporting

Appendix 2 Assurance activity descriptions

The following is provided to give clarity on the terms and references used in our assurance activities:

Term	Description
Agreed upon procedures	Specific procedures carried out by an assurance provider, which have been agreed with the company.
Assurance plans	A plan of the activities we will carry out to provide assurance on the data/information that we publish
Board assurance statement (BAS)	A signed or approved statement from our Board as evidence that they have compiled with regulatory and/or legal requirements for a submission. Depending on the submission, this could range from acknowledging that they have understood the submission and its requirements through to fully endorsing the contents of the submission.
Check on quality of information	The preparer (or responsible person) of a submission confirms the quality of the submission that it meets requirements, is prepared following the method statement and is supported by auditable evidence.
Committed Performance Level (CPL)	In order to measure our progress against our performance commitments, we agree committed performance levels with Ofwat for each year of the five-year regulatory period. Our committed performance levels are published in our Final Determination.
Customer and stakeholder involvement	External guidance, challenge and/or review of our submission from customers or customer groups (e.g., Customer Challenge Group).
Data review	This review is responsible for providing evidence of verification of data and/or gives a level of confidence over on the accuracy of entire return.
Executive or Board approval	Executive or Board approval challenges and assesses the submission for all qualities listed in figure 1.
Expert review	Can be external or a member of the Thames Water team who may be a regulatory specialist to conduct an expert review to ensure that submissions are complete, accurate, in accordance with regulatory guidance. They may, at times, also provide support, guidance, and assistance with the production of the material.
External audit	An external audit of information is carried out by an independent third party, who will express an opinion as to whether the information they have audited is a true and fair reflection of the state of the company's affairs and whether it is in line with relevant statutory and accounting guidelines.
External or internal independent assurance	An internal or external person or business independent of Thames Water team who may be a regulatory specialist to conduct an expert review, or an independent assurance provider (such as a Professional Services Firm) to conduct a data or process audit. They ensure that submissions are complete, accurate, in accordance with regulatory guidance, accurate and reliable through verification of data and/or that there are adequate and effective controls ensuring timely, complete and accurate submissions.

Term	Description
Gateway	Formal internal process where submissions are independently reviewed to ensure that the submission meets the Company's expected high quality for external publications. The gateway release is evidenced by signed Information Integrity Declarations (IIDs).
Information integrity declaration (IID)	Formal documentation completed by individuals to confirm that they have prepared/reviewed/approved the submission as part of first and second line assurance, in accordance with internal guidelines.
Internal audit	An internal audit of information is carried out by a team who is independent from those who compiled the information; however, they are not independent of the company. Internal audit consists of specific procedures that assess the accuracy of information being reported and whether the methodology used is appropriate.
Method statement	This explains the process to produce the submission and includes details of systems, responsibilities, timings, additional methodologies to complete any calculations required etc.
Oversight functions	A team or individual within Thames Water who has some independence from the business area management teams (such as Internal Audit) to conduct a data or process audit. They ensure accuracy and reliability of the submission through verification of data and/or that there are adequate and effective controls enabling timely, complete, and accurate submissions.
Process review	Not responsible for ensuring that returns are complete and accurate but to provide an independent challenge to the process to produce the submission/publication. Including review of the adequacy and effectiveness of the internal control systems to ensure the returns are timely, complete and accurate.
Senior manager review	This review challenges and assesses the accuracy of the submission.
Submission plan	The submission plan outlines a timeline and accountability for preparation and review of the submission.

Source: Ofgem Data Assurance Guidance version 1.3 and Thames Water

