

TMS05 Customer Challenge Group (CCG) Report

SEPTEMBER 2023

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Introduction

Who we are and what we do

The Customer Challenge Group (CCG) is independent and acts as a critical friend to Thames Water. We constructively challenge Thames Water on the:

- Quality of its engagement with the customers and communities it serves.
- Extent to which customer priorities are reflected in what the company does.
- Company's delivery against those priorities.

We play an important role in helping Thames Water to develop a good quality submission for its 2024 price review (PR24) and secure the funds to deliver the right priorities for customers in Amp 8 (Asset Management Period 2025-30).

As CCG Chair, I was appointed in summer 2021 and recruited other CCG members.

So that the membership reflects Thames Water's diverse customer base, and that we can relate to and understand the views of our customers, all CCG members live or work in the Thames area or have a local connection to our region. Open recruitment provided a good mix of essential experience, varied sector knowledge and diverse perspectives. To maximise the expertise and diversity of the membership, we partnered with an agency, Green Park, to support our search for members who would bring expertise in key areas such as: Communications, Behaviour Change, Customer Protection, Community Engagement and Inclusion. Appointed members are remunerated.

In addition, the Group has members with current roles in the Environment Agency (EA), Greater London Authority (GLA), Consumer Council for Water (CCW), and representation from Local Authorities. They bring industry expertise and detailed regional knowledge.

The CCG remains well informed about customer interests through daily news round-up and social media. An email address allows members of the public to make direct contact with the group. We visit Thames Water sites and regularly listen to customer calls (where we have permission). Members can also observe research and focus groups.

A small secretariat supports the CCG. Individually and collectively, we remain independent by setting our own annual work programme which is detailed in section J. The CCG is free to communicate directly with the Senior Executive and the Board. All interests are declared, and any conflicts avoided by ensuring concerned members are not involved in the decision.

Full CCG membership can be found at Annex i. Further details of our work are in Annex ii.

For more information about us or to view our reports and minutes from meetings, please visit

[Customer Challenge Group | Performance | About us | Thames Water](#)

The CCG operates to a set of principles that means we:

- Aim for the widest possible range of people to be engaged with and heard.
- Pay special attention to customers who are deemed 'vulnerable', or in vulnerable circumstances, and to those who speak and advocate for them.
- Respect environmental assets and seek to ensure that standards are complied with.
- Balance the interests of people living in London boroughs with those of customers elsewhere in the varied region.
- Check for equity across generations and assess the benefits of addressing immediate issues,

such as flooding, leakage and sewer discharge, against the need to invest in sustainable supply for the future.

- Support Thames Water in mobilising partnerships that increase opportunities for public stewardship.

Working with Thames Water

The CCG appreciates the amount of information made available to us by employees at Thames Water and the integrity and speed of response to each of our challenges. In particular, the teams involved with customer research and drafting the Business Plan have worked exceptionally hard to meet tight regulatory timelines while maintaining positive and constructive engagement with CCG. Thames Water's openness to challenge signals a disposition towards meeting customer needs which we hope will be realised in implementation of the plan.

As with all CCG challenges, Thames Water has responded to every point raised by the CCG throughout the drafting process. We hope that the iteration has resulted in a stronger plan with emphasis on customers' interests woven throughout the text.

CCG engagement with Thames Water has not been restricted to the price review. Scrutiny and challenge across the five themes in our overall work programme, is set out in section J.

The full list of CCG Challenges is documented across this report including the following annexes: Annex iv. CCG Business Plan Feedback log; Annex v. Detailed schedule of CCG Challenges on Customer Research; and Annex vi. CCG Challenge log by outcome which groups challenges against CCG work programme objectives.

Scrutinising the Business Plan

When Thames Water introduced its schedule for the production of the Business Plan, the CCG expected to comment on the early draft in December 2022. Due to commercial sensitivities, the plan was not shared with the full group at that time. CCG delegated four members, including the Chair, to work in a Focus Group to scrutinise the key elements of the proposed Business Plan with the Executive. The feedback from the Focus Group is described in Section B.

The Focus Group worked with the CCG to:

- Test the customer engagement approaches against Ofwat Principles.
- Check that standards for high-quality research have been maintained.
- Facilitate high quality customer challenge.
- Provide and support independent assurance about the process.
- Support collaborative research with Ofwat/CCW including affordability and acceptability testing and Your Water Your Say.
- Establish a line of sight between expressed customer preferences and proposals for the Business Plan.

By March 2023, the draft plan (IBP4) was available. This contained headline financials and a limited narrative but set out the assumptions, principles and precepts upon which the Business Plan would be based. The CCG undertook deep scrutiny of the document.

Oversight of the progress on the Business Plan was punctuated by the premature departure of the CEO in late

June and appointment of a new Chair in July. Thames Water refocused its turnaround strategy. The CCG was concerned about the impact this would have on the Business Plan at this late stage and whether it would be possible to retain congruence between the extensive consumer research already conducted and emerging business priorities.

Although the intense media scrutiny throughout July of Thames Water, and the sector as a whole, was disconcerting, the CCG continued to concentrate on the interests of consumers.

The CCG was encouraged by early confirmation from incoming Chair Sir Adrian Montague, that getting better at communicating with customers would be one of his top two priorities¹. Initial plans were shared quickly, and the CCG was invited to the Board on 31st July to provide feedback. On behalf of the CCG, the Chair and Vice-Chair presented comments.

Following a detailed review of the proposed new Business Plan narrative version 0.15, the CCG added more detailed points at the subsequent Board meeting on 24th August. Final representation on the Business Plan to Board members was at the Regulatory Services Committee on 26th September. Full details of CCG engagement with the Board are at Annex iii.

Assessment of the Business Plan

Thames Water shared Business Plan narrative version 0.15 at the CCG meeting on 7th September and this report concludes with that analysis. Some of the narrative was incomplete with sections yet to be finalised. The CCG notes that qualitative Affordability and Acceptability Testing (AAT) took place in April-May 2023 on three options for the Business Plan; a 'proposed', a 'must do' and an 'alternative' scenario. Customers preferred the 'proposed plan'. Subsequently, the Business Plan was amended, and this approach was approved by the Thames Water Board in July 2023 with quantitative AAT taking place on this updated plan in August-September 2023. A key difference between the proposed plan and the submission is that the enhancement expenditure to improve river health by reducing phosphorus concentrations is not included and not all statutory aspects of the WINEP will be met in AMP8.

A core objective of the CCG was to follow Ofwat directed scrutiny of the Business Plan as listed in Section C. Our rigorous assessment of customer engagement against Ofwat principles (Section D) and standards for high quality research (Section E) indicate a robust approach by Thames Water. We are also confident that the quality of customer challenge has been strong (Section F). The CCG was deeply involved with the collaborative research and, overall, we consider this to have been well conducted with CCG feedback incorporated at relevant points (Section H). Generally, the CCG concurs with the independent expert assurances by Savanta.

Triangulation of these research findings is presented in Section I. The CCG concludes that the overarching principles of effective triangulation have been followed. In terms of strategic planning, research expertise and understanding, proportionality to investment decisions, and transparency, the Business Plan maintains a strong emphasis on reflecting what customers, communities and stakeholders want.

The plan has been built against a backdrop of weak performance, poor asset health and high customer and regulatory expectations and it is structured in a way that tells a clear story of Thames Water's desire to meet delivery imperatives against significant challenges. It is set within a long-term strategic

¹ Defra Select Committee 12.7.23

vision that reflects customer needs and wants and incorporates many of the points made by CCG – for example, information around metering, workforce and complaints is now more detailed.

The CCG acknowledges that the narrative recognises issues that customers say are important to them. None the less, we have concerns that there remain areas where there are differences between customer expectations and the anticipated outcomes of the business plan. Our overriding consideration is that customers must not be disadvantaged by limitations on Thames Water’s capacity to finance and deliver its plan, especially in context of widespread public anxiety over ageing infrastructure, leaks and river water quality. There are also discrepancies between the plan and regulatory and legal requirements, as the CCG understands them at the time of reporting, and we are clear that any impasse should not be to customers’ detriment.

Above all, customers need to see a return from higher bills. It is crucially important that the business plan leads to tangible improvements in service for present and future customers.

The CCG considers it important for the regulatory model to support investment so that: future customers do not pay disproportionately for the asset deficit; the environment is protected; and customers continue to get good quality water and waste treatment.

Three other aspects of the plan are worth noting:

- *Partnership* - The CCG welcomes Thames Water’s commitment to create synergistic benefits from the investments and to work in partnership with other agencies such as the GLA and local authorities to deliver the plan.
- *Impact* - The CCG endorses the framework for assessing enhancement cases which includes an analysis of detriment to customers. An early concern for the CCG was that certain areas of investment, such as basement flooding, can have a severe impact on households but only directly affect a relatively small number of properties. On this basis, we wanted to ensure that investments took account not just of the needs and wants expressed by customers, but also were weighted by the level of harm that could result from their absence. This is supported by Ofwat’s new ODI rates which reinforce the impact of service failures.
- *Developers* - Given the environmental pressures that come from the increasing urbanisation of the Thames region, the CCG supports emphasis on Infrastructure Renewal Charges paid for by developers.

The CCG recognises the ambitious nature of the plan and will support efforts to monitor performance and track the delivery for customers.

Footnote to Regulators

Scrutinising the Thames Water submission for PR24 has proved to be a complicated process for the CCG, in particular the late publication of research impacts on our ability to comment meaningfully on its impact. We offer some observations for the post-PR24 evaluation.

It would be helpful if the outputs could be agreed between the stakeholders at a much earlier stage. The interaction with Ofwat, EA, DEFRA and Thames Water is yet to agree resource management and environmental requirements and likely to squeeze out the scope for improvement in customer services. The CCG recognises the scale of the programme needed to protect the environment and encourages greater balance to be maintained between that investment and funds required for asset health and customer priorities.

Comparability in research among the water companies is helpful in assessing the quality of engagement. However, some of the frameworks were issued at short notice and, in some instances, the defined nature of the output left little flexibility to adapt the research for the uniquely diverse nature of the Thames Water customer base. The CCG reinforces the point that in striving for consistency, research parameters should not become too prescriptive. This was raised with Ofwat and CCW by the chairs of the CCGs at the meeting on 19th April 2023². The CCG recognises that Ofwat has attempted to put customers at the centre of the business planning process and appreciates that there is more to do to learn from what did, and did not, work so well.

The CCG supports Ofwat's ambition to have a consistent national approach to the incentivising of water company performance that is driven by consumer best interests. We understand that the bottom-up econometric modelling exercise has not worked out as hoped, but none the less agrees that consumer interests can still drive decisions fundamentally for PR24 and beyond.

We look forward to our active participation in an evaluation of the PR24 process. In the meantime, my deep thanks to all the members of the CCG who have pored so diligently over a great deal of research and information and contributed so actively to the drafting of this report.



Sukhvinder Kaur-Stubbs
Chair of the Customer Challenge Group

² CCW/Ofwat 19.4.23

A. Customer Priorities

Thames Water engages its customers, communities and stakeholders to identify needs and wants. The term ‘customers’ is used here to refer to consumers, too. Citizens and society refer to the wider public. These commonly and interchangeably used terms are defined in Table 1.

Table 1: CCG Definitions

Category	Definition
Customers	Individuals, businesses, and organisations responsible for paying the water bill
Consumers	Those who use tap water and sewage disposal/treatment facilities
Communities	People with a geographic or other common interest
Citizens	The wider public including people who live, work or travel through the region
Society	National and local government and organisations/interest groups and broader environmental interests

Among the top five wants are the need for a constant supply of safe, high quality wholesome drinking water at good pressure, fair, affordable and accurate bills, fix leaks and reduce wasting drinking water, prevent sewer flooding into my property and provide and a reliable sewerage system that works 24/7³.

Figure 1: Combined Customer Ranking of Wants

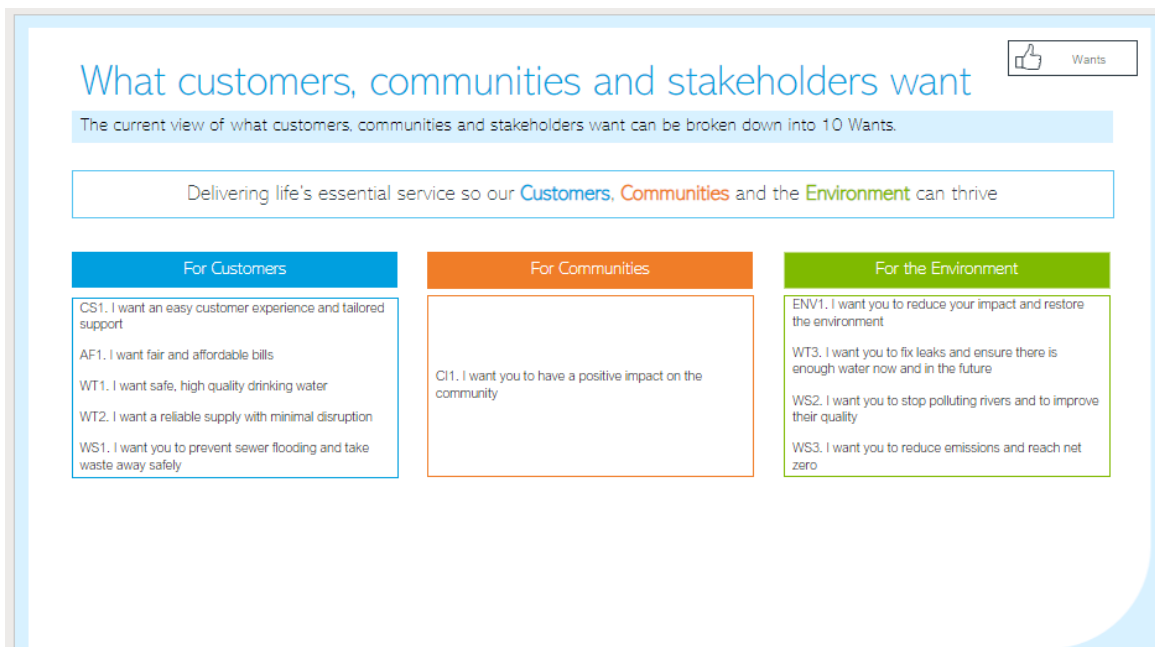


Source: Thames Water

³ TMS04 What Customers, Communities and Stakeholders Want

Environmental concerns, especially about river pollution and longer-term sustainability, are rising for customers. Lower down on the list of priorities are broader issues about the way in which Thames Water works and its impact on people and nature.

Figure 2: What Customers, Communities and Stakeholders Want



Source: Thames Water

In our assessment, the CCG expects to see a clear line of sight between the priorities expressed by customers and the areas of investment and delivery in the next five-year plan. When it comes to the hard choices that will need to be made, customer interests must be paramount.

Thames Water has identified the key documents that will help demonstrate line of sight between these outcomes and the allocation of resources⁴. The CCG will take these into account when assessing the extent to which customer priorities have been met. Our conclusions are set out in Section I on Triangulation. Other observations are flagged in Table 2 with responses from Thames Water.

Table 2: CCG Observations on Customer Priorities

No.	Challenge and Response
1.	<p>Are customer preferences nuanced enough? The delivery standard or the magnitude of improvement is not evident in the outcomes. Eg in the case of cleaner rivers, how much cleaner do the rivers need to be to meet customer expectations? What is good enough in each of these areas is not clear.</p> <p>Thames Water response:</p> <p>Many of our individual research studies have explored the right level of service with customers. In response to the specific question raised in the CCG's report, we think the most illuminating report is the research on our 2050 Vision in which we explored</p>

⁴ TMS03 Customer Engagement

	<p>customers’ expectations in each of the key service areas (unconstrained by cost or deliverability).</p>
<p>2.</p>	<p>The extent to which customer preferences are influenced by media is not demonstrated. With water featuring so highly in the public discourse, attitudes and expectations are likely to change substantially even during the timetable for the drafting of the business plan.</p> <p>Thames Water response</p> <p>We have ongoing surveys (such as our brand perception tracker) that will continue to inform how societal issues and media coverage impact our customers’ attitudes towards us/our service, and we have further PR24 customer surveys in progress. We’ll use insights from these in our final triangulated What Customers Communities and Stakeholders Want and line of sight before plan submission – and will continue to triangulate insights in the coming years.</p> <p>We have taken on previous CCG challenges regarding the evolving influence on our customer base of wider societal issues (e.g. cost of living, climate change and environmentalism), and how this might have led to changing views on customer needs, wants and preferences for our current services and future plans. We have provided a formal response to the CCG on this point. We have added a section to WCCSW 18 (‘Societal context’) to acknowledge this.</p>
<p>3.</p>	<p>Compliance with new regulatory standards is so costly and additional equity so limited, the discretionary spend available to meet customer preferences is constrained. There are few hard choices to be made to reflect customer preferences; essentially, the hard choices are about balancing the need to achieve compliance, address asset health and deliver basic performance.</p> <p>Thames Water response</p> <p>There are elements of existing obligations - including WINEP AMP7 - which have in practice proven more expensive to deliver than what was estimated at PR19. We are therefore seeking additional allowances from Ofwat to take into account the cost increase. The new obligations around Industrial Emission, Critical National Infrastructure and AMP8 WINEP sit alongside ongoing obligations under the Water Industry Act. We agree with the CCG that our plan needs to strike the right balance across the different drivers, recognising that the dimensions of compliance, resilience and performance are typically not mutually exclusive.</p>

B. Challenging the Business Plan

The CCG Focus Group met regularly with the Thames Water team to undertake detailed discussion on all aspects of the Business Plan before sharing findings with the full group. CCG challenges on the content discussed and the process is set out in Annexe iii – CCG Feedback on the Business Plan. Key points are summarised here.

Table 3: CCG Observations on the Business Plan

No.	Challenge and Response
4.	<p>The CCG are not experts in financial analysis and were left with some uncertainty about the investment choices presented and the amount of discretionary spend available. We await economic assessment of the enhancement cases but we have made no attempt to offer assurance on the questions of financeability of the plan or to comment on the PAYG ratio.</p> <p>Thames Water response:</p> <p>Our plan identifies the key TOTEX building blocks as follows: 10.3bn Botex, £0.5bn cost adjustment claims, £2.7bn enhancement, £1.6bn for asset deficit and £0.9bn for AMP7 WINEP (additional cost/scope). We have included in our business plan narrative a summary of the enhancement cases and can make individual enhancement cases available to the CCG on request.</p>
5.	<p>The CCG questioned the deliverability of the programme based on two factors.</p> <ul style="list-style-type: none"> • Shortcomings in the extent to which PR19 performance commitments have been achieved, which lower our confidence in operational capacity. • The rate of achieving the capital delivery programme appears slow. <p>In IBP4 (GOLD), the CCG were informed that some deliverability constraints had been reviewed so that performance could be re-assessed. A change in the capacity of the Capital Delivery team and confidence that the supply chain could deliver the required projects would deliver a faster turnaround. Since then (July 2023), the delivery envelope and forward priorities have changed. CCG await further information.</p> <p>Thames Water response</p> <p>PR24 Narrative shared with the CCG on 11 August 2023 - Exec summary 1.1 We operate in an increasingly challenging environment. We are expecting a 'deliverability' report from Jacobs next week which assesses the Capital Delivery ramp up - we will summarise the findings in the APD chapter, so can share this with CCG members too.</p>
6.	<p>The CCG asked for a clearer understanding of the equity arrangements. In particular, how much of the new plan is funded through loans and how payments are calculated to pay back investors and reward shareholders? Additionally, how does the bonus structure correlate with customer experience?</p> <p>Thames Water response</p> <p>Shareholders provided additional equity of 0.5bn in March 2023, and have committed to an additional £750m subject to the creation of a new focussed turnaround plan and</p>

	appropriate regulatory arrangements for AMP8, and indicatively £2.5bn additional equity in AMP8.
7.	<p>The CCG asked for the Business Plan to have a narrative about customer priorities woven throughout its text, rather than be restricted to an annexe or the line-of-sight document. We await to see the Business Plan to see if this has been achieved.</p> <p>Thames Water response</p> <p>In earlier version of documents, Table 9 of Appendix 1 Approach to Engagement we summarise the various documents where we demonstrate light of sight across the plan and what is covered within each.</p> <p>In our final plan, our TMS03 Customer Engagement appendix signposts to line of sight content throughout the other submission documents.</p>
8.	<p>The CCG is keen to undertake additional exploration with Thames Water on Bill impact, especially among the most vulnerable customers and the prospect for innovative social tariffs.</p> <p>Thames Water response</p> <p>Two options were considered for bill profiles, a Plateau and Smoothed profile. While the Plateau profile creates a larger one-year increase in bills in 2025 this is at a time when the OBR forecasts interest rates to have reduced and wages will have caught up in real terms. The Plateau profile will allow affordability support to be optimised to a smaller overall population as peak bills are lower than the Smoothed profile in the last two years of AMP8. By changing the eligibility criteria of the social tariff it will focus support on those who need it most, in line with best practice and backed up from our own analysis from piloting the criteria this year. The proposed tariff innovation can still go ahead without the Green Economic Recovery programme and has significant potential to create more progressive forms of cross subsidy collection, increasing the scale of support by over 60%.</p>

C. Ofwat Directed Scrutiny

Ofwat no longer considers the CCG as the only source of independent assurance on the company's plan but has set standards for CCGs to use in their scrutiny.

There are four Ofwat Guidelines against which the CCG has rated Thames Water's performance. These are:

- Principles of Customer Engagement.
- Standards for High Quality Research.
- Quality of Customer Challenge.
- Independent Assurance.

The CCG assessment was cross-checked with the report Thames Water Approach to Engagement March 23. Thames Water responded to initial observations from the CCG and took these into account in the Business Plan.

Assessment by the CCG was rag-rated to identify where standards were met, partially met or not met. In general Thames Water performed well. There was strong convergence between assessment by the CCG and independent assurance commissioned from Savanta.

As the detailed reports from Savanta are presented in TMS50 Customer Engagement Assurance Phase D, the CCG rag rating is not therefore duplicated in this report. However, recommendations from the rating and areas for improvement, are detailed in the sections that follow.

D. Principles of Customer Engagement

Overall, Thames Water’s framework of ongoing research⁵ appears to provide a strong foundation to develop insights about the full range of customers. The CCG is broadly satisfied that Ofwat’s principles are met. Customer segmentation is comprehensive and a wide range of communities and stakeholders is targeted.

Following challenge from the CCG, discussions with Non-Household segments are now conducted separately from Householders to ensure individuals answer questions on behalf of their business. The CCG notes that among the key points of difference for Non-Households are: service failures, higher compensation when things have gone wrong, willingness to pay more for a resilient and reliable water, more welcoming of the roll-out of smart-metering and ‘smarter data’ (accurate billing) and they place less importance on environmental and community-based initiatives.

Reflecting the full range of customers is a challenge for Thames Water due to the variety of its region and the rich diversity of the 16 million people it serves. This makes it harder to customise and provide context for all and also, in ensuring deep understanding of current and future customers.

As a result, the CCG is pleased that Thames Water responded to its challenge to gain greater insight about the different minority ethnic groups across the region, especially those who may be at risk of vulnerability⁶. The research targeted customers from minority ethnic backgrounds with other vulnerability risk factors overlaid including low incomes, long-term debt/unemployment, caring responsibilities, disabilities, poor mental health, digital exclusion and limited English skills. It is a positive step in building understanding about specific communities across the region who may have particular or different needs and wants from their water and waste services. We look forward to hearing more about how it is applied.

With security of our water supply at risk, growing population and more extreme weather patterns, the CCG highlights the need to refrain from passing on huge costs to future generations. Therefore, greater emphasis is needed now on working with individuals and families to reduce consumption and slow down the rate at which rainfall reaches the sewers. Up to now, perhaps consumers have been able to take water for granted. Looking ahead, there may be greater impetus to change the value customers ascribe to water.

Key observations made by the CCG on customer engagement are listed in Table 4.

Table 4: CCG Observations on Customer Engagement

No.	Challenge and Response
9.	Are the number of non-household interviews sufficient? Thames Water response:

⁵ Thames Water Framework of Research

⁶ Vulnerability Deep Dive Research Report March 2023

	<p>The number of non-household interviews is generally around 10-30% the size of household interviews. With non-households representing 5% of the customer base, these sample sizes appear sufficient.</p>
10.	<p>The proportion of future customers in research is variable, ranging from 6% to 16%. Following challenge from the CCG, Thames Water stated that ‘the next edition of WCCSW will contain a new section in the segments chapter, dedicated to future bill payers’. Thames Water also confirmed that their planned research around the long term delivery strategy will include a disproportionately high quantity of future bill payers. The CCG look forward to considering this future research and understanding what ‘disproportionately’ means. It is disappointing that capturing these insights is arriving late in the process.</p> <p>Thames Water response</p> <p>In response to v3 of the CCG’s report in May 2023 we shared a list of research projects where future bill payers were included, and the numbers engaged. We believe this demonstrated the inclusion of this segment in research over the last two years.</p> <p>What Customers, Communities and Stakeholders Want v18 included a new section on future bill payers, to draw together the insights from this segment.</p> <p>Further research with future bill payers is underway, so our insights on this segment will be further boosted:</p> <ul style="list-style-type: none"> - Future Customers Context, a qualitative survey where 30 future/new bill payers discussed the wider context of what is important to them and how water/sewage services fit in. - Long Term Delivery Strategy qualitative survey where 27 out of 54 household interviews (50%) will be with future bill payers.
11.	<p>The CCG asks Thames Water to consider longer term engagement of current and future customers in co-designing solutions to consumption and in improving their understanding of the need for asset investment.</p> <p>Thames Water response</p> <p>App 1 -section 2.5 - we set out the ways we already work with customers and communities to co-deliver better outcomes (examples) / vision - Key outcome for our 2050 vision is that our customers understand and manage their impact on our water system and environment. We recognise that we need to work with customers and support them in making choices that saves water and prevent blockages.</p>
12.	<p>The CCG encourages Thames Water to embed a culture of diversity within the company, to ensure that documentation and decision making automatically takes into account, the wide diversity across the region.</p> <p>Thames Water response</p> <p>Thames Water have a robust Skills and EDI (Equality, Diversity and Inclusion) Strategy to ensure we create a workforce reflective of our communities and create an inclusive place to work.</p>

As a business, we seek to increase minority representation at all levels across the business and increase the percentage of colleagues promoting Thames Water as an inclusive great place to work. To strengthen connections with both our customers and colleagues, we acknowledge and celebrate the diversity of backgrounds and beliefs within our teams by creating an inclusive workforce where every colleague takes pride in being part of an organisation that embraces, supports and respects individual differences.

Our equity, diversity and inclusion strategy aims to create a nurturing and respectful work environment that values and celebrates individual differences.

Our approach to creating a workforce diverse of our communities is reflected in our all resourcing approaches for example this summer we hosted our 3 summer interns demonstrating our commitment and approach to embedding this across all areas of the business.

- 48% female
- 87% ethnically diverse
- 9% have an impairment, health condition or learning difference
- 40% received free schools meals
- 41% were first in family to achieve GCSEs
- 48% were first in the family to attend university
- 21% of the cohort are care leavers with 1 Refugee

E. Standards for High Quality Research

The CCG assessed the research as of high quality, useful and generally well contextualised, fit for purpose, continual and ethical.

In general, the research is neutrally designed and well facilitated. The purposeful nature of the research combined with the complexity of explaining the water systems, has at times, made the questions appear a little leading. Where this was observed, Thames Water made efforts to negate or explain in the findings.

A full schedule of all our challenges on customer research is available in Annex v. Thames Water has responded to all the points set out by the CCG. We note that most challenges have been accepted or explained. Highlighted in Table 5 are the areas for further consideration.

The CCG welcomed the joint research undertaken in partnership with Affinity where it and TW have customers in common.

Table 5: CCG Observations on High Quality Research

No.	Challenge and Response
13.	<p>Review the background information presented to participants to ensure it provides a basis for understanding the issue and its significance to the fullest range of customers and consumers.</p> <p>Thames Water response:</p> <p>Savanta’s Phase A recommendation has been actioned. Our PR24 research reports have a section where the research agencies describe how they’ve met Ofwat’s standards for high-quality research. Under the ‘useful and contextualised’ heading some reports spoke about context setting for the survey respondents, when Ofwat’s requirement was more about the research context among the wider engagement programme. This has been rectified.</p> <p>When the PR24 research reports were updated on this recommendation from Savanta, the report backgrounds were also checked and updated to ensure societal/media background at the time of fieldwork was mentioned.</p> <p>We have taken on previous CCG challenges regarding the evolving influence on our customer base of wider societal issues (eg. cost of living, climate change and environmentalism), and how this might have led to changing views on customer needs, wants and preferences for our current services and future plans. We have provided a formal response to the CCG on this point. We have added a section to WCCSW 18 (‘Societal context’) to acknowledge this.</p>
14	<p>Achieving the right sample sizes for the diversity of the Thames Water population remains a challenge. The CCG appreciate that Thames Water have adopted an incremental approach to improve their insights on customers who are disabled, have minority ethnic backgrounds, part of low income households or younger in age. The</p>

interests of those with health vulnerabilities, non-English speakers and digitally excluded, also warrant continued attention. Over time, Thames Water will develop greater understanding of specific needs of these consumer groups. Meanwhile, customer preferences may be biased towards the interests of typical customers. The CCG recommends comparison between the 2011 census data and results of the new Census to consider if there is any significant skew in demographics.

Thames Water response

To ensure our surveys are representative of Thames Water household customers, we base sampling quotas for various demographic characteristics on the ONS Census neighbourhood level data, a well-trusted source.

Other household characteristics are based on Thames Water’s own customer data, such as water/waste service provision⁴, location⁵ and metered status⁶.

For PR24 we continued to use household quotas used for PR19, based on the 2011 Census. However, in February 2023 as new neighbourhood data became available from the 2021 census, we updated our quotas, including the non-Census derived quotas, to be used for our customer engagement from March 2023. The updated quotas include a split for the ethnicity quota into our dual London and Thames Valley & Home Counties Water Resource Zone areas and our waste-only area. This is because we found significant differences in ethnicity make-up across each area (and significant differences compared to the 2011 Census). Other characteristics were not broken down in this way as significant differences were not found across the service areas.

A slight amendment was made to the age quota in August 2023 to adjust the youngest age band to start from 18 instead of 16, to reflect Ofwat and CCW guidance and collaborative surveys.

15

The enhancement options were not tested against a 'do nothing' scenario as recommended by the Treasury Green Book. Given the rising cost of living, one option that customers may want no 'enhancements' above statutory requirements and instead prefer bills to remain the same or to decrease.

Thames Water response

When we first tested potential packages of enhancements with customers in our 'Enhancement package options research - September 2022' the absence of a 'No enhancements' option was a deliberate limitation of this research, which we have noted in the research report. We have since addressed this insight gap through the qualitative stage of our Acceptability and Affordability Testing (May 2023) where we tested a 'Must do plan' option that only included statutory enhancements, and the corresponding bill impact was the lowest of the three plan options tested, both in the short-term (by 2030) and the longer term (by 2050). Due to the scale and associated cost of meeting

	<p>statutory requirements in the future, it would have been misleading to test plan options with bills staying the same or decreasing.</p>
16	<p>The CCG requested an analysis of respondents to the WRMP consultation on the building of a new reservoir in Oxfordshire. In particular, it will be helpful to understand if there is any correlation between attitudes and proximity to the location.</p> <p>Thames Water response</p> <p>South East Strategic Reservoir - findings from the report</p> <p>The reservoir is considered the best solution and that it would be an asset to the local area. The concerns raised by the local community were not considered strong enough to prevent the build and many feel that having a space for recreation would be an additional benefit to the local area.</p> <p>Participants were introduced to the plans for the reservoir to be built in the Upper Thames catchment, south-west of Abingdon in Oxfordshire. The information included details of the location, the size, and what would be involved in the development of the plans. The benefits of the proposal and the concerns by the local community were included in this information.</p> <p>Participants also saw a visual representation of the plans and were given information about the size using recognisable frames of reference.</p> <p>Reservoirs are easy to understand and are considered a natural solution that could benefit the environment, as well as provide a reliable water supply in the future. Therefore, this is the most accepted of the three initiatives. There is some disappointment the plans will be for the smaller size (to respond to local objections) as building a larger reservoir was thought to better protect the Thames Water area from running out of water in the future. With no obvious downside bar the immediate disruption of the build, it was felt that having a larger reservoir for a similar cost seemed like the best approach to ensure a secure water supply for the future without the need for further investment.</p> <p>The research was qualitative and included 123 household, non-household and future bill payers. In line with the make-up of our region, around 80% were in the London Water Resource Zone and 20% in our other zones. On the reservoir, there was positivity across age groups and geographical location. Non-Household customers in particular feel not going for a larger size, when costs are similar, is a missed opportunity.</p>

F. Quality of Customer Challenge

The CCG note the good practice in sharing PR24 research findings in full as early as possible with as wide an audience as possible.

The CCG welcomed Thames Water’s decision to publish its EDM data. Data is an important asset like pipes and water treatments works. As Ofwat observe, data is essential for developing insight, making informed decisions and improving services. The use of open data could transform water and wastewater service delivery by increasing transparency, increasing efficiency, enhancing customer experience, and stimulating innovation. Communities working together with Thames Water to collect, share and use data, can improve understanding of the constraints the company faces but also help adapt to changing environments.

Areas for improving the quality of Customer Challenge will be impacted by the points flagged in Table 6.

Table 6: CCG Observations on Quality of Customer Challenge

No.	Challenge and Response
17.	<p>How are customer views taken into account in Thames Water’s consideration of:</p> <ul style="list-style-type: none"> • Affordability • Balance in overall planning decisions. • Enhancement cases. • Phasing of investment over AMPs <p>Thames Water response:</p> <p>We have undertaken qualitative Acceptability and Affordability Testing with customers on 3 different versions of the business plan, in-line with Ofwat and CCW guidance. We tested a number of specific enhancement cases and performance commitments in order to establish whether customers were comfortable with what we were proposing in our plan, as well as with the associated bill impacts. A second quantitative phase of AAT is planned for August-September. We will ensure that customers’ concerns relating to affordability are clearly presented in our proposals in our Bill impact, Affordability and Vulnerability strategy.</p> <p>Similarly for enhancement cases, we will provide a summary of targeted engagement and how our plan responds to it in each specific enhancement case technical appendix. Through various targeted research i.e. PR24 Deep Dives, PR24 Enhancement Package Options research, specific enhancement cases have been tested with customers, which demonstrate customer support for both the ‘need’ for the enhancement, as well as the proposed solutions. The testing of solutions with customers comprises both the approach to delivering each enhancement as well as the pace at which action should take place and timescales/phasing of investment.</p> <p>Reviewing this research in the round, alongside wider research in What Customers, Communities and Stakeholder Want provides us with a clear evidence base for balance</p>

	<p>overall planning decisions alongside other factors. We will demonstrate this Line of Sight in our core narrative and TMS03 Customer Engagement.</p>
18.	<p>More comparative data (with progress, innovation and efficiencies benchmarked against other companies) to be provided in performance reporting.</p> <p>Thames Water response</p> <p>We will share comparative information on TW's performance on the key ODIs. This is drawn from benchmarking reporting that we have used to estimate our future ODI exposure.</p>
19.	<p>Greater transparency in how the evaluations of different business options have taken account of customer views.</p> <p>Thames Water response</p> <p>We will ensure it is clear how customers have influenced our proposals, using evidence from a range of key sources. We will also highlight and provide justification for any trade-offs / where proposals go against customer views / wants</p>
20.	<p>The CCG encourages greater sharing of data to gain insights and collaborative solutions to other complex problems.</p> <p>Thames Water response</p> <p>We share the CCG's belief that data sharing and collaborative solutions are important enablers to improved performance. We continue to participate in Ofwat's innovation fund, a pre-requisite to which is collaboration. In 2022 we committed to and delivered EDM data publication and through our procurement processes we advertise commercial opportunities to 3rd party consortia. We have been discussing with Ofwat the benefits of providing longer term funding certainty which would catalyse new partnerships to deliver long term outcomes, although it appears unlikely that Ofwat will be able to commit beyond the price review period to a particular funding level on a particular programme (as it did for Tideway). In line with the Secretary of State's guidance on prioritising statutory schemes over non-statutory schemes we are scaling back our investment in AMP8 on smarter water catchment management, a key tenet of which is collaborative solutions.</p>

G. Independent Assurance

The CCG viewed Savanta's report on Board Assurance which includes independent expert assurance of:

- Customer research programme.
- Individual research elements.
- Triangulation of research findings.
- Customer views reflected in decision making (LOS).
- Customer Challenge.

Overall, the CCG concurs with the conclusions on the quality of the research programme, individual research elements and triangulation of research findings are strong. The CCG welcomes the opinion of Savanta that our independent challenge is robust.

Throughout the drafting process, the CCG has received assurance updates on engagement (19 May) and PR24 Line of Sight (26 May), Phase B Interim Assurance (11 August) and Phase C Assurance (22 September). These were welcome. In addition, a group of the CCG members met with the Chairs of the CSC and RSC Board Committees to understand how the Thames Water Board engages with customers⁷. At this meeting, members of the CCG flagged a number of concerns:

Meaningfulness of Research

- How significant is the drag between research and any recent shifts in public attitudes?
- Is there enough understanding for customers of the impact of their choices? Eg a preference for reducing basement flooding may only translate into the safety of the lives of those in the highest risk properties – it will not prevent damage to all homes.

Line of Sight

- How do decisions correspond with customer expectations? Eg Need for high quality water is correlated with action to combat serious bacteria breaches. Might customers consider this a basic requirement rather than an improvement?

Balance of Spend

- To what extent is the imperative for compliance and performance at the expense of resilience (asset health) and what impact is this likely to have on service failures?
- How real are the trade-offs for customers - is there value in engaging them in a more realistic assessment of the options available within the water sector?

Trust and Transparency with Customers

- Is there an opportunity to rethink plans around ODI rates?
- The need for absolute transparency in funding arrangements for customers and what they can expect to pay for now and in the future.
- Results of the Serviceability Report from Ofwat⁸ suggested underspend against allowances – what are the implications of this for customers?
- Is there a pivotal opportunity for a new more frank conversation with customers?

⁷ Chairs Meeting Notes 13.7.23

⁸ Ofwat Serviceability Report July 2023

The CCG noted that the RSC and ARRC would provide independent oversight and challenge on the development and quality of the business Plan on behalf of the Board. In the meantime, the CCG offered a number of observations on independent assurance as set out in Table 7.

Table 7: CCG Observations on Independent Assurance

No.	Challenge and response
21.	<p>Implications of the suggested underspend against allowances shown in the Ofwat Serviceability Report July 2023:</p> <ul style="list-style-type: none"> • How will Thames Water catch up on existing commitments? • Have they delivered on enhancements? • Should customers be concerned that delivery is back-ended to maintain cashflow? • Are customers getting the investment they paid for? • Will Thames Water be asking for more allowances when current aren't used up? <p>Thames Water response:</p> <p>The Ofwat report highlights spend over the first 3 years of the AMP. We have been rebuilding the capital delivery capability and this had been doubling in size each year in the early part of AMP7. At a total business level we are forecasting an overspend vs the Final Determination of AMP7, after the conditional allowances. Aspects of some programmes (e.g. the AMP7 WINEP) have been more complex in scope to deliver, and more costly than was envisaged at PR19 and these projects will be completed in AMP8. Where projects have been funded by customers in AMP7, but the project has been deferred to AMP8, customers will not be paying twice, although we will be seeking in our business plan an incremental allowance to take account of the more complex scope and cost. During AMP7 Thames Water faced significant headwinds - in terms of cost inflation and extreme weather events. This necessitated some slow-down of capital spend, and we have been reprogramming our delivery accordingly.</p>
22.	<p>Further engagement required with the Line of Sight which maps how customer preferences are translated into investment decisions.</p> <p>Thames Water response</p> <p>PR24 narrative shared with the CCG on 11 August includes examples of line of sight.</p> <p>Our plan delivers improvements across our 10 Outcomes, emphasising the things that matter most for our customers. In determining our proposals for the PR24 plan, we have considered customer views alongside other factors such as our legal obligations, affordability and deliverability in the context of our current performance. We have made choices that aim to ensure we have balanced and phased our delivery to meet our long-term objectives for customers, communities and the environment.</p> <p>To help the CCG and others navigate our Line of Sight, in the latest version of our Customer Engagement business plan technical appendix (TMS03) we brought together Line of Sight content from across our plan in one place.</p> <p>In Tables 3.4 to 3.12, we demonstrate the overarching Line of Sight for our PR24 business plan, including a summarised view of what we heard, how we are responding</p>

	and what we will achieve by the end of AMP8. The insights summaries in this table are underpinned by more detail in our What Customers, Communities and Stakeholder Want document (TMS04). We also provide a more detailed line of sight from insights to proposals in several documents across our plan as documented in Table 3.3. While our plan delivers the things customers want, in some areas we have had to make difficult choices and trade-offs due to wider constraints, these are documented in Table 3.13
23.	<p>The CCG calls for greater transparency in communicating with customers on the limitations of the choices available and how their funds will be used.</p> <p>Thames Water response</p> <p>We agree with the CCG and intend to build this into our business plan Customer Summary and communications around the business plan submission.</p>

When the CCG returned to meet with the RSC to discuss the Line of Sight on 26th September, the CCG Chair and Deputy presented on behalf of the group. The CCG was satisfied that there was a clear line of sight between the preferences and priorities expressed by customers and the investment decisions offered. The CCG understood there were hard choices to be made and could see the efforts to explain the decision-making and its potential impact.

However, there remained a few areas where the CCG identified a degree of dissonance between customer expectations and the outcomes they might receive. Set out in further detail in Section I Triangulation, these areas include affordability, sewer flooding, leakage, pollutions and C-Mex. In a rich discussion, the CCG was encouraged by the RSC's interest in how the new bills might be received by those struggling with the current cost of living crisis. The RSC committed to testing the trade-offs to review whether Thames Water had done all it could to invest in areas of greatest concern to customers and consider if they had articulated the right choices in the best way.

Further discussion took place on communications and transparency. The CCG encouraged Thames Water to remain outwardly facing and connected with its customers in the challenging years ahead while it attends to improving core aspects of the business. Efforts to improve transparency, such as publishing the EDM, didn't always generate positive results and, therefore, it was important for Thames Water to be able to continue to translate and explain the data and to support customers and stakeholders in making sense of it. The CCG pointed to the C-Mex as an area where improvement would take time to materialise. The CCG urged Thames Water to consider when customers would see the benefits of increased bills, how they would keep them on side in the meantime and, what more it could do to generate trust in its ability to deliver on the promises.

H. Collaborative Research, Acceptability and Affordability Testing, Enhancement Cases, Comparability, Your Water Your Say

In conjunction with CCW, Ofwat also developed a **collaborative framework** for research. It covers some areas of the customer research to inform common areas of companies' business plans and Ofwat's decisions. It is expected to cover:

- Performance Commitments.
- ODI rates.
- Affordability and acceptability testing (AAT) of business plans.
- Affordability and acceptability testing of draft determinations.

At the point of assessment, research to inform Performance Commitments and incentive rates had been withdrawn by Ofwat. The CCG has not had adequate time to comment on how the new rates reflect customer priorities.

The CCG's commentary on the AAT, enhancements case research, along with reflections of Ofwat's desire to improve comparability, is provided in Table 8.

Collaborative research also included a public consultation, *Your Water Your Say* which the CCG comments upon.

Affordability and Acceptability Testing

The CCG has been involved with the Affordability and Acceptability testing of Business Plans both in terms of the scrutiny of the format and sampling of stimulus materials. Challenges are documented in the research log and summarised below.

Table 8: CCG Observations on Affordability and Acceptability Testing

No.	Challenge and Response
24.	<p>CCG queried sample size, approach to capturing the experience of disabled customers and spread of ethnicity across the segments.</p> <p>Thames Water response:</p> <p>The CCG was informed that: Thames Water's approach on sample size and incentive rates were consistent with Ofwat/CCW guidance; appropriate quotas for disability would be applied to the later quantitative study; and ethnicity would be added to the list of characteristics for all groups, not just billpayers.</p> <p>We believe the interviews with customers with health vulnerabilities will provide us with a good representation for this qualitative phase of the research. We also expect that we will naturally come across participants with disabilities (or who live in households where disabilities are represented) as part of the general recruitment for the face to face discussion groups, due to their general prevalence in the population. We will record the number of customers with disabilities as part of the recruitment process and we also plan to use accessible venues, materials, and procedures, to give disabled participants the best opportunity possible to be included.</p> <p>The quantitative survey involves a random sample of customers, but in the analysis of the findings we will apply weightings for ethnicity, age, gender and Indices of Multiple</p>

	<p>Deprivation decile (Ofwat mandated). It is not practical to apply any more than four weightings and so 'Disability within the household' will not be included, although we expect that participants with disabilities will naturally occur in the large random sample (1800 household customers).</p>
25.	<p>Affordability was challenged not just in terms of its impact on social tariffs but also the broader impact of bills on households experiencing cost of living pressures.</p> <p>Thames Water response</p> <p>We think customers who are experiencing cost of living challenges across all levels of income will naturally appear in the sample, due to the large numbers of customers involved, the spread of Socio-Economic Grades and the financially vulnerable (social tariff) customers we are looking to recruit. The size of the incentive may also naturally attract customers who are currently struggling financially more than they used to. The recruitment questionnaire will include a question on how easy customers usually find it to pay their bills, and so we will be able to monitor how many of these customers are included in the sample.</p> <p>The otherwise random sample for the quantitative survey is structured into the correct proportions of each decile of Indices of Multiple Deprivation in the Thames Water area (Ofwat mandated), which will ensure representation from all income levels. We also have to make sure the size of the sample from areas of higher deprivation is proportionally higher in the sample than the population, to ensure representation (given lower response rates in these areas).</p>
26.	<p>Use of translators, incentive rates and locations for the research were also queried. The CCG noted the use of translators for those customers who do not speak English, and our suggestion for a further London-based event, were considered, but not taken forward.</p> <p>Thames Water response</p> <p>Looking at the latest data on the latest ONS census map, Newham is the Local Authority District in our supply area with the highest percentage (8.1%) of people saying that English is not their first language, and they either cannot speak English well or at all. With over 90% of people in all Local Authority Districts in our area saying that English is their first language or they can speak English very well or well, we do not believe it would be good use of resources to translate recruitment and stimulus materials and potentially provide interpreters for the very small number of customers that could be included in the research. It is also worth noting that provisions for these customers were not included in the recent Ofwat collaborative research for PR24.</p>
27.	<p>Suggestions for simplifying stimulus materials were taken into account.</p> <p>Thames Water response</p> <p>We took steps to simplify the materials in light of CCG feedback, particularly how the long-term future bill impacts for each plan option were presented, and how the differences between the options were illustrated to allow comparison between the three plan options.</p>

The stimulus materials were thoroughly scrutinised by key members of the CCG before and after cognitive testing took place. The CCG was seeking to ensure that it was easy for customers to understand and

engage with the materials. Many of our challenges related to aspects of the materials which had been prescribed by Ofwat/CCW and could not be changed. However, Thames Water was responsive to other comments which related to simplifying and clarifying the materials. Members of the CCG were also invited to observe the qualitative research. We were impressed by the quality of the discussions, which were supported by excellent independent facilitation.

Thames Water proposed three options for the Business Plan – Least cost/must do, proposed, alternative. The CCG was unclear how the eight enhancement cases related to the three plans tested in the Acceptability and Affordability research⁹. Thames Water clarified which elements featured in each option (see Table 9). However, the decision-making remains opaque because the financing is complex. The CCG is not skilled in assessing BOTEX requirements.

Qualitative Affordability and Acceptability Testing (AAT) took place in April-May 2023 on three plans: a “proposed”, a “must do” and an “alternative” plan. The business plan was subsequently amended and approved by the Thames Water Board in July 2023 and quantitative AAT on this updated plan took place in August-September 2023. Enhancement expenditure to improve river health by reducing phosphorus concentrations is not included in Thames Water’s business plan, and the CCG notes that not all statutory aspects of the WINEP will be met in AMP8.”

Table 9: AAT Plans Options

Enhancement	Position in options
WINEP – improving river health	Included and highlighted in all 3 plans, but slower rate in the Alternative plan.
WINEP – reducing sewage spills to rivers	Included and highlighted in all 3 plans.
Improving resilience to sewer flooding in homes	Included and highlighted as discretionary enhancement in Proposed and Alternative plans only
Sewage treatment growth	Included in total bill impacts for all 3 plans but not highlighted due to lower individual impact on bills
Infiltration reduction	Included in total bill impacts for all 3 plans but not highlighted due to lower individual impact on bills
Improving water supply resilience	Included and highlighted as discretionary enhancement in Proposed and Alternative plans only
SEMD (Security & Emergency Measures Direction)	Included in total bill impacts for all 3 plans but not highlighted as is a statutory enhancement with lower individual impact on bills.

⁹ Enhancement case research.

Basement flooding from trunk mains	Included and highlighted as discretionary enhancement in Proposed and Alternative plans only.
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Enhancement Cases

The CCG was pleased to see that the framework for assessing enhancement cases included an analysis of detriment to customers. This was an early but important point we raised. We were mindful that certain areas of investment such as basement flooding can have a severe impact on households but only directly affect a relatively small number of properties. On this basis, we wanted to ensure that investments took account not just of the needs and wants expressed by customers, but also were weighted by the level of harm that could result from their absence.

The CCG was given limited opportunity to review the enhancement case research materials. This was due to a short time frame between when materials were shared with the CCG and the date required for feedback. Queries regarding the methodological approach raised with Thames Water are summarised below in Table 10.

Table 10: CCG Observations on Enhancement Cases

No.	Challenge and Response
28.	<p>Better timeliness of research proposals to allow adequate time for CCG input. The tight turnaround made it extremely difficult for CCG to scrutinise all the materials effectively in the time available and to ensure full confidence in the methodology.</p> <p>Thames Water response:</p> <p>We recognise that due to programme timing constraints there was limited time allowed for the CCG to scrutinise feedback.</p>
29.	<p>Absence of a pilot for quantitative survey on enhancement case and query about confidence levels of results with small sample size.</p> <p>Thames Water response</p> <p>Following this challenge the quantitative survey was started with a soft launch so the first 100 interviews were reviewed to check the survey was working before continuing with the remaining interviews. It was felt that a full pilot was not required as the questionnaire wording was heavily based on the materials used in the preceding online community (which itself had a phased start to allow for misunderstandings and queries on the materials to be rectified).</p> <p>Following this challenge we ensured the final report detailed the confidence levels of the key samples analysed from the quantitative survey:</p> <ul style="list-style-type: none"> - Households: N=1000 – confidence level: 95% margin of error: approx.3% - Non-households N=204 – confidence level: 95% margin of error: approx.7% - Future bill payers N=51 – confidence level: 95% margin of error: approx. 14%

	- Digitally excluded: N=92 –confidence level: 95% margin of error: approx. 10%
30.	<p>Concern about neutrality of research was addressed by Thames Water by removing a quote which could risk bias.</p> <p>Thames Water response</p> <p>We agreed with CCG challenge and removed that quote from the trunks mains bursts materials for example. As the materials evolved for all 8 cases we took neutrality into account and aimed for a similar structure and tone of information across them all.</p>
31.	<p>Need to simplify complex financing arrangements so that they can be understood and trusted by consumers.</p> <p>Thames Water response</p> <p>In the summary customer version of the plan we will include a diagram which summarises how we spend each customer pound (which includes payment to lenders). Post business plan submission we will review the website pages which explain our finances to identify opportunities to improve how this is communicated.</p>
32.	<p>Continue to ensure detriment/magnitude of harm to customers of inaction on choices is taken into account.</p> <p>Thames Water response</p> <p>We are facing into and will need to make difficult decisions and trade-offs. To guide our approach, and ensure that we reached decisions in a principled and considered way, we are taking into account a range of factors, including:</p> <ul style="list-style-type: none"> - Health and safety of our people and our customers - Potential public health risks and environmental impacts associated with implementing or not implementing certain programmes (in particular, those with potentially high adverse impacts). - Performance and critical resilience improvements which we understand through engagement are of greatest importance to customers, regulators, and other stakeholders. - The need to meet our statutory compliance and licence obligations, and to perform our obligations to customers. - Our aim to secure maximum value from every pound spent for our customers and the environment and run our business in a way that supports the achievement of broader environmental outcomes and policy commitments. - Our goal of achieving a sustained and sustainable turnaround of the business and promoting financial resilience.

Comparability

The CCG welcomed Ofwat's commitment to improve the comparability of the research across the companies. We also recognise an element of prescription is necessary to draw comparisons between the different companies.

The short notice of some of the collaborative frameworks and the defined nature of the output, at times, limited the flexibility to adapt the research for the uniquely diverse nature of the Thames Water customer base. The CCG is concerned that in setting consistent parameters, the research remains meaningful. This point has been raised with Ofwat and CCW by the chairs of the CCGs at the meeting on 19th April 2023¹⁰. The CCG recognise that Ofwat have attempted to put customers at the centre of the business planning process and appreciate that there is more to do to learn from what did and did not work so well. We look forward to our active participation in an evaluation of the collaborative research.

Your Water Your Say (YWYS)

The *Your Water Your Say* meetings, mandated by Ofwat, had a laudable objective to enhance the customer voice in the business planning process. An initial session took place on 19th May and a subsequent one is due to be held after submission of the PR24 bid to allow customers and stakeholders to question whether, and how, issues previously raised had been addressed, as well as to pose new questions.

As a 'town hall' type of event, where a self-selected cross-section of the public is able to quiz Thames leaders online, YWYS's capacity to engage the full variety of voices and interests across the present and future customer base is limited. Digital exclusion is a particular concern about the format.

At the first session, attended by about 150 people (some 300 had registered), questioners were typically relatively knowledgeable about the water industry and had an active interest through civic engagement or past issues with water supply, water waste disposal or billing. There was very little ethnic diversity. A number of questioners were from west London and wished to discuss Thames Water's proposal to extract 150 million litres of water a day from the River Thames above Teddington Lock, replacing it with treated wastewater from Mogden sewage works.

The session was skilfully facilitated by an independent chair, who ensured there was ample time for questions about customer service and regulation in addition to more topical issues of river quality, sewage discharges, adequacy of supply and shareholder reward and responsibility. The chair ensured also that Thames Water management representatives, including the then chief executive, were required to provide answers. However, the CCG views the exercise as a useful supplement to the core consultative process rather than a key plank of it.

The process of price determination comes with limitations that can make it hard to see all our principles reflected in the design and delivery of the research elements - especially inclusivity. There was an opportunity, which was missed, for Ofwat to encourage more diversity in the format of the YWYS events. This point is captured in Table 11 below.

¹⁰ CCW/Ofwat 19.4.23

Table 11: CCG Observations on Your Water, Your Say

No.	Challenge and Response
33.	<p>Opportunity for greater inclusivity in the format of the YWYS event.</p> <p>Thames Water response:</p> <p>To gain views of under-represented customers we have reached out to organisations who represent them including our vulnerability network and network of front line colleagues who directly support them. In addition we have reached out to relevant representative the top 10 Local Authorities with highest risk of digital exclusion. This was in addition to our general invitation to Local Authorities</p>

I. Triangulation

Triangulation in this context is defined as the means of using multiple independent measures to examine a hypothesis or conclusion being investigated which demonstrably avoids confirmation bias and maximises the validity of the decisions being made. The broad overarching principles of effective triangulation include: strategic planning, research expertise and understanding, proportionality to investment decisions, and transparency.

To utilise the maximum potential of a wide range of evidence sources and validate findings effectively, triangulation needs to be an ongoing and iterative process that occurs throughout the key stages in business plan development. Furthermore, the evidence of triangulation needs to be presented in a manner that clearly demonstrates the Line of Sight between customer & stakeholder evidence and proposals.

Thames Water's framework¹¹ is in line with the recommendations made by CCW from its review of PR19 Business Plans which highlights the importance of a strategic approach to collecting customer data, synthesizing the evidence, weighting of different sources of information including customer engagement/research and combining preferences, validating the outputs and incorporating the findings into decisions. This also includes setting out clearly where there are conflicts between what customers report and/or between different drivers of choices (e.g. regulatory) requirements, and how these tensions have been addressed.

The CCG concludes that the overarching principles of effective triangulation have been followed. Thames Water has carried out triangulation using sources in line with CCW guidance on best practice to develop key insights. It has drawn upon these insights in its strategies and supporting documents to demonstrate how it has responded to customers wants, alongside other factors. This is demonstrated in its Line of Sight in TMS03 Customer Engagement, which details its aim to connect what customers want with the investment decisions offered. In terms of strategic planning, research expertise and understanding, proportionality to investment decisions, and transparency, the Business Plan maintains a strong emphasis on reflecting what customers, communities and stakeholders want.

The CCG accepts that delivery constraints limit the extent to which expressed customer preferences can be fulfilled and other concerns such as health and safety become paramount. The criteria set out in the Business Plan (section 2.8), clearly define the hierarchy in the decision-making

Thames Water Criteria for Decision-Making

- The health and safety of our colleagues and the wider public.
- Potential public health risks posed to our people and customers and environmental impacts associated with implementing or not implementing certain programmes (in particular, those with potentially high adverse impacts).
- Performance and critical resilience improvements which we understand through engagement are of greatest importance to customers, regulators, and other stakeholders.
- The need to meet our statutory compliance and licence obligations, and to perform our

¹¹ Triangulation Document

obligations to customers.

- Our goal of achieving a sustained and sustainable turnaround of the business and promoting financial resilience.

Although clear in intention and method, the hard choices lead to a level of dissonance between the expectation of customers and the proposals for delivery. The key areas where there may be a difference between expressed preferences and the outcomes presented include:

- *Affordability* - At a time when the cost of living crisis affects so many, the CCG recommends greater visibility of how bills will impact on different cohorts of customers and the level of mitigation from social tariffs. The CCG notes that customers prefer gradual ('straight line') increases in bills but Thames Water opted for a step change. Once the new prices are effective, the CCG recommends close monitoring of how affordable the bills remain for those in economically vulnerable circumstances. In due course, it is hoped that the innovative tariff will be implemented and again, the CCG will look for evidence on its impact on those requiring extra support.
- *Sewer flooding*: Only 1,137 properties out of 187,000 (para 10.2.7) at risk of internal sewer flooding will be targeted for investment. The CCG understands that the properties targeted are where there is the greatest risk of harm to residents. It remains the case that many other residents remain at high and moderate risk. The CCG considers it important that there is effective engagement with residents in properties still at risk and that they are signposted to advice or support to protect themselves.
- *Leaks*: Customers feel that the current level of leakage is too high. In response Thames Water focuses on the reduction of per capita consumption and business demand alongside tackling leaks (para 9.2.2). The need to address leakage on customer properties and in managing high demand is accepted. The CCG recommends more is done to articulate to customers the efforts to reduce the water wasted through Thames Water's own burst pipes. These efforts should be communicated in ways that connect with customers' use of water. Instead of talking in percentage points for example, reductions in leakage could be explained in human scale such as numbers of showers taken or toilets flushed or even swimming pools. Real time updates on reported leaks (including explanation of when they can not be attended) inspire confidence that Thames Water are doing their best to reduce wastage.
- *Polluting rivers*: Customers have a low tolerance for pollution of rivers with untreated sewage and want to see significant efforts made to reduce both the frequency and severity of events. Yet the ambition for the reduction of the total annual duration of discharges is 50% by 2030 (para 9.1.3). The CCG is interested to know how Thames Water will engage community groups to work towards greater consensus on how much can be done and how quickly.
- *Customer experience*: Customers want Thames Water to be easy to contact and have their issues and queries handled effectively by knowledgeable staff. Plans to respond depend heavily on investment in assets to prevent failure. Improvements in C-Mex may not materialise until year three of AMP 8 (para 7.1.5). The CCG recommends that Thames Water's communications plan considers how it will convey that improvements are being made in the three years before any tangible difference for customers. The CCG expects to see robust tracking of performance so that improvements appear on schedule.

With the anticipated level of increase in bills, it will be vital for customers to see a return. It is crucially important that the business plan leads to tangible improvements in service for present and future customers. The CCG recommends close attention be given to when this is likely to be evident to customers and how Thames Water will communicate it. The CCG will continue to monitor performance to help assure customers that Thames Water's delivery is on track and in line with plans.

J. Demonstrating Impact

The CCG remains committed to acting in the interests of customers, consumer and citizens in the region. Our annual work programme which includes the scrutiny of the Business Plan identifies 5 key outcomes for customers (see Table 13 below). These are areas where we channel our scrutiny and expertise to help make a tangible difference in the performance of the company. The CCG will publish our annual report later in the year with an assessment of Thames Waters’ progress against these objectives and our role in influencing improvements.

Through extensive engagement, the CCG challenged Thames Water across all of the themes. This is our Challenge Log by Outcome and can be viewed at the CCG dedicated [website](#).

Table 12: CCG Outcomes for 2023-24

Theme	Outcome	What Success Looks Like
Inclusivity	Thames Water understands and responds to the diverse needs of current and future customers, in particular those who are generally less heard from.	The Business Plan shows a clear line of sight between the investment decisions and What Customers, Communities and Stakeholders Want.
Affordability	Thames Water understands bill impacts on all of its customers and their expectation of fair and affordable bills, especially in the context of the cost of living crisis, and this is reflected in TW's business plan and in its support for customers.	The CCG is assured that TW has considered and taken account of customer needs in expanding the Priority Services Register and innovating social tariffs.
Choices	Thames Water's criteria incorporate, and respond to, the needs of different stakeholders and customer groups in strategic decisions for the longer term.	The Business Plan shows a clear line of sight between the investment decisions and What Customers, Communities and Stakeholders Want.
Performance	In delivering its performance outcomes, TW reflects customer interests, improves environmental awareness and engages with wider and political issues important to citizens and communities.	TW are demonstrably more proactively engaged in the media, of all forms on issues of wider customers’ interest.
People	TW's workforce, culture and profile means that TW better understands and interacts with its customers, wider society and local communities.	Staff survey responses show improvements among groups with protected characteristics.

Annex i. CCG Members

Sukhvinder Kaur-Stubbs – Chair



Sukhvinder is Chair in Common of Kingston NHS Foundation Trust and Hounslow and Richmond NHS Trust. She is Chair of Regeneration at the Queen Elizabeth Olympic Park and a Board Member of the Government's Regulator of Social Housing. Previously CEO of the Barrow Cadbury Trust and of the Runnymede Trust, she is a community champion determined to advocate for all consumers, particularly those at greatest risk of vulnerability. She served on the Cabinet Office Better Regulation Executive and two terms on the Board of Severn Trent Water.

Baroness Tanni Grey-Thompson DBE – Vice Chair



Tanni is a Crossbench Peer in the House of Lords and has served on numerous boards including the BBC, Transport for London and the London Legacy Development Corporation. She has been an influential advocate for consumers across a variety of sectors. She is an Ambassador for UNICEF and Disability Rights UK and is one of Britain's greatest Paralympian athletes. She is currently Chair of Sport Wales.

Nisha Arora – Director of Consumer & Retail Policy, Financial Conduct Authority



Nisha is a Director at the Financial Conduct Authority, responsible for the FCA's consumer protection strategy, including the FCA's Consumer Duty, its work on vulnerability and inclusion, and consumer partnerships and insight. Nisha led the FCA's work to protect consumers impacted by the pandemic. Prior to joining the FCA, Nisha was a Senior Director at the Competition and Markets Authority, where she oversaw its consumer protection and enforcement work and established its Equality, Diversity and Inclusion group. Previously, Nisha was a senior Director at the Office of Fair Trading, and a legal adviser in central Government and private practice.

David Brindle – Chair, Ambient Support



David is a journalist and former public services editor of The Guardian, where he won a number of awards for his writing on social policy issues. He advises on strategic communications and is a regular conference chair and speaker. He has been a board member of national charities, social enterprises and housing associations for almost 30 years and currently chairs Ambient Support, which provides services across England for older people and those with learning disabilities and mental health issues. The welfare of people at risk of exclusion continues to be his overriding concern.

Jeremy Crook OBE - Chief Executive, Action for Race Equality



Jeremy is the Chief Executive of Action for Race Equality (ARE), a London based charity working collaboratively to ensure ethnic minority young people succeed in education and have pathways to good careers. Social mobility is very important to him, and he wants to see all young people have opportunities to succeed and not be held back because of bias and discrimination in the workplace. Jeremy has over 35 years' experience of advising government and large organisations on actions to deliver ethnically equitable and inclusive workforces and services. .

Charlotte Duke, Partner, London Economics



Charlotte is a leading expert in behavioural economics with over 15 years experience in customer behaviour. Charlotte is a Partner at London Economics, a consulting firm providing economic advice to the private and public sector internationally. Before moving to the UK, Charlotte was an advisor to the Victorian Government in Australia where she worked on water and land protection. "As a behavioural economist I understand we are all unique and as water customers we all play an important role in the protection of our water, land and biodiversity'. I look forward to working with Thames Water's listening and engagement with water customers."

Cllr Adam Jogee – Labour Councillor for Hornsey, Haringey Council



Adam has been a local Councillor since May 2014 and is among the youngest elected Mayors of Haringey having served two municipal years - 2020/21 and 2021/22. The environment has always been a passion for Adam as well as focusing on getting things done for residents and the local community; and speaking truth to power. He chaired the Environment and Community Safety Scrutiny Panel for two municipal years and is a political advisor to a Shadow Minister in Parliament.

Tiger De Souza MBE - Executive Director People and Culture, Samaritans.



Tiger is the Executive Director of People and Culture for Samaritans providing leadership on all people matters including equity, diversity and inclusion and organisational culture. Alongside these core people related activities, Tiger is the executive lead for design and delivery of opportunities for people with personal experience of using our services, and of suicide and self-harm, including those bereaved, to share their views and experiences with the charity. He was previously the People Engagement Director at the National Trust and in 2020 he was awarded an MBE for his services to volunteering.

Monica Wilson – Policy Professional, Civil Service



Monica is an experienced policy professional. She has spent the majority of her civil service career to date at HM Treasury, and has spent over 20 years working on a diverse range of policy and delivery issues, including better regulation, citizen engagement and public value. She is passionate about inclusion, having co-founded HMT's Women's Network, and is a strong supporter of apprenticeships as a driver of social mobility and organisational development. She has served as a trustee of a debt advice charity and is active in her local community. Monica is also a mum of two young boys.

Representatives

Pete Daw – Head of Climate Change, GLA



Pete Daw is a specialist in urban and environmental policy and is currently Head of Climate Change with responsibility for London's climate change mitigation, adaptation and green finance policy and programmes. Previously Pete worked for Siemens as Director of Urban Development and Environment at the Global Centre for Cities where he worked with cities globally to help them understand the role technology can play in tackling their challenges

Sarah Powell – Water Company Account Manager, Environment Agency



Sarah has worked for the Environment Agency and its predecessors for over thirty years. In that time, she has fulfilled a number of roles relating to regulation and enforcement, environmental planning, policy and customer engagement. She served as the Water Industry Planning Manager during PR14 and PR19 and led the Environment Agency's input to the WINEP taskforce alongside Defra and Ofwat before taking up the role of Water Company Account Manager in October 2021. She takes a lead on matters relating to Thames Water and Southern Water.

Cllr Pete Sudbury - Liberal Democrat/Green Alliance Member, Wallingford Division in Oxfordshire.



Councillor Dr Pete Sudbury is a Liberal Democrat/Green Alliance Member for Wallingford Division in Oxfordshire. He is cabinet Member for Climate Change and Environment.

Pete is retired NHS psychiatrist and Medical Director with qualifications in Natural Sciences (MA), Medicine (BM, BCh), Psychiatry (NRCPsych), Business (MBA). He also spent 2 years as Hewlett-Packard Enterprise (UK/EMEA) “Health Insider”.

Pete has been County Councillor since Dec 2019.

Doug Taylor - Doug Taylor - Consumer Advocate, The Consumer Council for Water (CCW)



Doug is a consumer advocate at the Consumer Council for Water (CCW). He is vastly experienced in consumer affairs, particularly within financial services. He brings over 20 years of experience as a senior manager in not-for-profit organisations and campaigns and public affairs including working at Which? He is a former Deputy Chief Executive of the British Society for Rheumatology; former National Director of the National Union of Students; past member of the Financial Conduct Authority consumer panel. He is also an Enfield councillor with 25 years’ service and was a past Leader of the Council for eleven years.

Annex ii. The Work of the CCG

The current CCG have been established in January 2022. Between January 2022 and September 2023, the CCG held over 30 formal all group meetings. Topics covered by the formal meetings are listed below in Figure 3 and Figure 4.

In spring 2022, the CCG agreed to focus their forward plan around five key interest areas which can be mapped across to Ofwat’s suggested themes for Customer Challenge:

- Inclusivity (customer service).
- Choices (significant investment).
- Performance (customer service, water and wastewater service).
- Affordability (bill impact).
- People.

Since then, small focus groups targeted their challenge on specific topics via calls, materials’ reviews and additional meetings.

Figure 3: CCG Topics Covered During 2022

CCG topics covered / PR24 related engagement – in blue

Month	Topics covered
January 2022	Scene setting, Intro to C-Mex, Intro to longer term planning (Water Resources, WRSE , DWMP) Introduction to Community investment – Smarter water catchments) Introduction to business planning (The strategic context, Ofwat’s PR24 themes, Ofwat’s timetable, Parallel planning processes, Our approach, How Ofwat assessed plans, How Ofwat viewed us, How you can help us)
February 2022	Introduction to customers and community engagement, How we understand customers and their preferences, Customer and community engagement guidance, Our customers, WCCSW, Foundation insights, Customer and community engagement plan, Vision 2050 engagement, Triangulation and Line of Sight Approach for PR24, Retail performance, C-MeX improvement plan, Approach to complaints, Vulnerability
March 2022	Water treatment Site visit, Wholesale performance, Conditional allowances overview, Business Planning trade-offs , CCG priorities / forward plan, WRMP and WRSE, Reducing river pollutions, London Flooding independent review
April 2022	Wastewater treatment site visit, Approach to Catchment partnerships and engagement with local environmental groups, Biodiversity,
May 2022	Complaints journeys and complaints definitions, Contact centre visit including call listening and Extra care, Customer engagement update
June 2022	CEO session, Wholesale & Retail performance Q4, Customer insights to inform PR24, PR24 Foundational Research, PR24 Enhancement Area Deep Dives, Vision 2050 research, What Customers, Communities and Stakeholders Want,
July 2022	Introduction to strategic roadmap, PR24 update, Access to sites, site visit, Update on Ofwat PR24 methodology / Implications for Customer Engagement / Initial discussion around criteria for decision making Feedback from WRMP / WRSE & WRMP / DWMP Customer Engagement, Affordability – feedback from the affordability subgroup / Update on social tariff modelling, Interview with Mike Woolgar on the London Flooding Independent review
August 2022	No formal meeting held
September 2022	Chair report and Members’ feedback (TW Board, CCW COG, CCG engagement evaluation, Ofwat consultation response, Cost of living crisis); What Customers, Communities and Stakeholders Want v16, Q1 Retail performance, Q1 Wholesale performance report
October 2022	Enhancement priorities (ie a triangulated view from all our insight of what customers want related to enhancement spend), PR24 - Silver Plan update incl line of sight, PR24 emerging approach to challenge plan, Affordability – our plan for social tariff, Wholesale performance Q1
November 2022	Culture, Skills and EDI, Incident management
December 2022	Inviting Challenge on our draft plan. Acceptability and Affordability Testing and Open Challenge Sessions , Retail Q2 performance, Digital transformation, Wholesale performance Q2, CCG annual review with TW Board Chair and RSC Chair.

Source: Thames Water

The CCG Report for Thames Water PR24 Submission
September 2023

Figure 4: CCG Topics Covered During 2023

CCG topics covered / PR24 related engagement – in blue

Month	Topics covered
January 2023	PR24 update, Implications from Ofwat Final Methodology, Challenge the Plan (Acceptability Testing & Your Water, Your Say challenge sessions), Incident management – working with Local Resilience forums, Listening to calls, Wholesale performance – wastewater focus FOCUS GROUP -Board engagement, financial analysis, deliverability, Customer priorities vs draft plan delivery,
February 2023	Vulnerability performance – Q3, Retail performance Q3, Billing strategy, Communicating performance to customers FOCUS GROUP - Business Plan scenarios (must do vs preferred plan), Details on DEFRA requirements, Enhancement cases breakdown, AMP8 customers outcomes, Preferred plan – proposed improvements for customers
March 2023	PR24 update (including bespoke PCs), Longer Term delivery Strategy, What Customers, Communities and Customers Want v17, Challenge the plan update (AAT, YWYS updates), Customer journeys (includes focus on home move and Smart metering), Q3 Wholesale performance, away day follow up, CCG Challenge log, CCG PR24 report
April 2023	PR24 Assurance approach, Customer Engagement Assurance, Your water your say update, CCG Challenge log / CCG PR24 report
May 2023	PR24 update, Vulnerability strategy update, Assurance of customer Engagement update, AAT update, Triangulation and line of sight, CCG report
June 2023	CEO session, Wholesale performance – Q4, PR24 update / update on customer prioritisation enhancement areas, Retail performance Q4, Social tariff discussion,
July 2023	PR24 update, Line of sight, Long term Delivery Strategy, CCG report, CCG Challenge log
August 2023	PR24 update, Customer Research update, Assurance update,
September 2023	Session with Thames Water Chairman, CCG report, PR24 update, Updated on Customer research, Affordability, C-MeX Plan, Enhancement Cases, WINEP , Line of Sight, Assurance, CCG report
October 2023	
November 2023	
December 2023	

Source: Thames Water

Annex iii. Board Engagement

To make sure there is an ongoing, two-way engagement between the CCG and the Thames Water Board, the CCG Terms of Reference include minimum expectations on interactions during the year. In addition, there is regular engagement between the CCG Chair and Chair of the Thames Water Board, as well as with the Chairs of the Customer Service (CSC) and Regulatory Strategy Committees (RSC). We also share all CCG minutes with the Board.

Table below includes formal interactions between the Thames Water Board and the CCG and is consistent with TMS03 Customer Engagement.

Table 13: Overview of CCG and Thames Water Board Engagement

Touchpoint	How the Board was Engaged and Feedback Provided
June 2022	<p>In June 2022 the CCG Chair attended meetings of the Board Regulatory Strategy Committee (RSC) and Customer Service Committees (CSC).</p> <p>The CSC meeting focused on a customer service update and C-MeX performance and improvement plans, providing an opportunity for the CCG Chair to challenge on the proposals, which were previously shared with full CCG.</p> <p>The RSC discussion focused on development of the PR24 plan. The CCG Chair shared key themes from recent CCG discussions, recommending that the company look to simplify language and narrative with customers. Both parties agreed that getting CCG input ahead of PR24 submission will be key. It was noted that CCG were developing a challenge log, which consists of all their challenges and company responses.</p>
July 2022	<p>In July 2022, as a part of the review of annual performance, the CCG published their first annual report which was shared with the Thames Water Board. In addition, the CCG Chair, on behalf of the CCG, raised the importance of simplifying what the company does to better engage customers; connect the vision with the performance reporting; and review the sequencing of programmes for quicker and more discernible enhancement to customer experience. Both documents are published on CCG website.</p>
December 2022	<p>In December 2022, the Chairman of the Thames Water Board and Chair of the RSC attended the full CCG meeting where they had the opportunity to hear first-hand discussion and challenges focusing on all aspects of company performance (specifically Water Quality, Supply Interruption, Leakage, C-MeX and Vulnerability metrics), Digital Transformation (e.g. improvements delivered through reimagined journeys which deliver benefit for front line staff and enable them to deliver a better experience to customers, or website improvements) and aspects of planned public engagement to inform the development of the Business Plan (including Acceptability and Affordability Testing and the Your Water, Your Say Open Challenge Session).</p> <p>The session concluded with a discussion between the Chairs and CCG focussing on four broad areas: pace of improvement; customer communication and their relationship with water; regulation and conflicting demands; and lastly the role of CCG including what is in and out of scope.</p>
January 2023	<p>In January 2023 the CSC Chair and CEO attended a CCG meeting at the Thames Water operational centre. The session focused on PR24 (including the implications of Ofwat's final methodology and public engagement to inform the development of the plan), as well day-to-day operations such as Incident Management and performance issues such as pollutions and blockages.</p>

	<p>Board representatives had the opportunity to directly hear the CCG’s challenge on the importance of building future resilience and impacts of climate change, as well as proactive collaboration between the company and local stakeholders to improve the planning and response to operational incidents.</p>
March 2023	<p>In March 2023 CCG Chair attended the RSC and CSC meetings.</p> <p>The CCG Chair provided an update on the work CCG have done as part of the PR24 process as well as other work in their key five areas. The Chair noted that work of the CCG is cognisant of current media interest in Thames Water’s performance.</p> <p>As part of the RSC attendance, the CCG Chair shared key themes from CCG discussion and engagement on PR24, and highlighted that key area of focus for CCG is ensuring the voice of the customer comes through clearly in the plan and strategic decisions taken. Part of the discussion focused on Board assurance, and it was agreed that a workshop would take place with the committee chairs and the CCG Chair to ensure that sufficient information is provided.</p> <p>Focusing on leakage engagement, the CCG Chair highlighted the importance of leakage to customers and suggested that areas for improvement include the ability for the customer to report leaks as well as view update on the time to fix leaks.</p>
July 2023	<p>On 13 July 2023 the chairs of the Board CSC, Board RSC and CCG met with company and CCG representatives to discuss board oversight of customer engagement and customer challenge. They considered Ofwat’s expectations of company boards on customer challenge and the evidence gathered so far to demonstrate compliance.</p> <p>The CCG members present at the 13 July meeting were broadly content with the quality of customer engagement, Line of Sight process and response to challenges received so far. On Line of Sight, the CCG Chair took the opportunity to remind the Thames Water team that the CCG had yet to see our final plan and have opportunity to challenge our choices and underlined her wish for this to be shared with the CCG as soon as possible.</p> <p>The CCG Chair attended the Thames Water Board meeting on 31 July 2023 and shared the CCG’s draft report with Board members in advance, including a summary of key challenges. The Board welcomed CCG’s presentation and highlighted the importance of hearing their views.</p>
August 2023	<p>In August 2023, Thames Water shared with Board and CSC/RSC, paper on Savanta’s Phase B assurance report including Thames Waters’ challenge arrangements and further recommendations.</p> <p>CCG Chair attended Board on 24 August to provide CCG’s view on the PR24 narrative which CCG will be reflecting in their updated CCG report. CCG Chair themed her presentation on the Plan itself, Pricing, forward looking Prospects, Public Value (and the longer term implications) and Promises. Thames Water Board welcomed the presentation and the strength of the CCG’s challenges ahead of their deliberations.</p>
September 2023	<p>The Thames Water Chairman attended the CCG’s meeting on 7 September 2023 and shared his reflections on the company’s position and feedback from the Thames Water Board meeting on 24 August where the PR24 plan was discussed ahead of its finalisation later in the month.</p> <p>The CCG Chair and vice-Chair attended the RSC on 26 September to share their final reflections on the CCG report.</p> <p>In September 2023 we have shared with Board Savanta’s phase D report which confirms that “Thames Water has an appropriate mechanism in place for customers and their representatives to challenge its ongoing performance, business plan and long-term strategy, and for detailed responses to this challenge. Thames Water’s Customer Challenge Group (CCG) is the primary conduit for customer challenge and</p>

	<p>provides Thames Water with feedback on these points on an ongoing basis, with Thames Water responding to these challenges in turn. We have assured the adequacy of this mechanism.”</p> <p>All Savanta’s recommendations from Phase B on customer challenge have been addressed by providing further evidence. In additional exhaustive list of CCG challenges is incorporated in the final version of CCG report.</p>
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Table 14: CCG Feedback to the Thames Water Board

CCG Comments at 31 st July Board following presentation of new plans from Co-CEO Cathryn Ross to CCG on 14 th July		CCG Comments at 24 th August Board following detailed review of Business Plan narrative version 0.15	
PLANS	Recognition that the Business Plan remains ambitious and request clarity from the Board of their levels of confidence in their deliverability and ability to still reflect customer interests. Substantial changes at such a late stage must not be to the detriment of the customer. CCG want to ensure that the voice of customers remains loud and clear in the new business plan and in the sequencing of investments through the AMP periods.	Request for information on key areas of risk in the plan and the outturn needed in AMP7 to transition into AMP8.	
		Commended the positive references to partnership working across London and Thames Valley stakeholders.	
		Benefits of metering to customers and the environment to be explained more specifically.	
		Note that the narrative is customer orientated. Research standards are good but not yet mapped against customer expectations.	
PRICE	Transparency in what the customer will be paying for and has paid for, and ongoing support for the most vulnerable.	Lack of clarity on bill impacts and how the Best Value option being taken forward relates to the customer preferred plan (Proposed Plan option).	
		Commended the positive emphasis on innovation in social tariff and encouragement for faster adoption and roll-out of pilots.	
		Question about whether the company would consider sharing profits from any over-performance in the future to cross subsidise social tariffs or rebate customers.	
PROSPECTS	Financial sustainability of the company and what this might mean for customers in the near and medium-term.	Request for plain and transparent reporting of financials ¹² .	
		Request for metrics on collection rates and bad debt to be augmented by greater insights on customer experience so that the cost efficiencies don't undermine the imperative for good service.	
		Greater information on the company's commitment to supporting a diverse and empowered workforce that better reflects the communities served and affinity with customers.	
PUBLIC VALUE	Further details about how the company will safeguard assets and long-term investment in the catchments and local communities.	Recognition of the strong emphasis on nature-based solutions which are important to customers along with projects on biodiversity, community and volunteering. Recommendation that the range of activity is grouped so that it appears more coherent, visible and scaleable.	
	What is the impact of the asset deficit on future customers?	Question about whether the Board are satisfied that the potential impacts of climate change are now adequately factored into the plans.	

¹² Also discussed at CCW/Ofwat Meeting 13.7.23

		Question about recent communication from Government about deferring non-statutory commitments including net zero and how this might affect the plans.
PROMISES	<p>Encouragement to rebuild trust with consumers so that they support the improvement journey, show some latitude when things go wrong and be more inclined to change their own behaviours to control demand.</p> <p>CCG observed the exceptional intensity of media speculation following the CEO departure and want to establish to what extent Thames Water’s customer research and engagement remains valid.</p>	Pleased to see the vision defined by customer expectations and look forward to seeing how this translates into outcomes for customers.
		Welcome emphasis on reducing complaints. Request for further details.
		Request for tracking mechanism relating to in AMP delivery from 2025-2050 to be shared with CCG.
		Acknowledgement of Thames Water response that customer preferences are not significantly impacted by media attention but detailed review of July impacts will only be available in late autumn.

Annex iv. CCG Business Plan Feedback Log

Table 15: CCG Business Plan Feedback

Area	Feedback and Response
Financial analysis	<p>Detailed breakdown of the main elements of BOTEX, compliance, resilience and performance and the impact on bills and affordability. Further information to show ambition of efficiencies within Botex to demonstrate how the company is pushing itself to minimise impact on customer bills.</p> <p>Thames Water response:</p> <p>Given delays in confirming planning assumptions for WINEP and ODI rates we were not able to finalise the base (BOTEX) elements of the plan until August. This detail is now included within the draft Business Plan and associated presentations.</p>
Discretionary spend	<p>Understanding the tension between regulatory requirements, company’s need for investment to deliver customers priorities and any potential scope for improved future resilience.</p> <p>Thames Water response:</p> <p>Although not mutually exclusive, we have retained the compliance, resilience and performance concepts to consider the investment focus. We are mindful that customers overriding want is for clean safe water, and for reliable wastewater services. We have identified a range of resilience interventions in AMP8 that we believe are absolutely necessary to address resilience and health and safety risks.</p>
Bill impact and funding	<p>Presented scenarios focus on bill impact for customers, what are the considerations for shareholders contributions.</p> <p>Thames Water response:</p> <p>The customer research will test the acceptability to customers of different service package/bill levels. We do not intend to test the acceptability of different shareholder investment levels. Shareholder contributions as envisaged £750m in AMP8 with indicatively £2.5bn in AMP8 are implicit in the 16.0bn TOTEX, and correspond to the overall TOTEX levels tested with customers (in particular the alternative plan).</p>
Deliverability	<p>Clarify the causes of delivery constraints and the impact of deliverability constraints on turnaround and to what extent that could impact on customers and asset health.</p> <p>Thames Water response:</p> <p>The 12 May focus group highlighted the causes of deliverability constraints. We are assessing the impact of our preferred plan on asset debt and risks to customers.</p> <p>We currently set out our deliverability constraints around £16bn which will target increase by 230% within our Capital Delivery function. Following engagement with</p>

Area	Feedback and Response
	<p>Defra we look at options to reprofile WINEP delivery by 2038 to work within the deliverability constraints despite the ambitious ramp up plan. We would keep key parts of the WINEP which are most important to customers. The decision will not be reached until end of June 2023.</p> <p>At the meeting on 10 June – deliverability constraints were explained and levels of confidence in delivery.</p> <p>At the next review point TW to explain the gap between proposed and alternative plans as tested through AAT – especially what it means for customers.</p>
Resilience enhancement cases	<p>Share further details on what economic analysis has been done in this area. Share how the EC are ranked based on customer priorities and add the TW view on the scale of the impact/benefit on customers and potential risk of harm.</p> <p>Thames Water response</p> <p>We shared with the CCG PR24 Focus group the evolving approach to prioritisation of activities which included consideration of our obligations and performance risks. As part of the plan narrative we refined these prioritisation criteria and these will be included within our plan and referred to in our line of sight.</p>
Enhancement cases	<p>CCG are interested to see the linkage between the between Gold enhancement cases presented on 12 May and the ongoing Enhancement research.</p> <p>Thames Water response</p> <p>We have shared updated customer prioritisation of enhancement areas with the CCG in June 2023. We have used these findings alongside of our prioritisation criteria to refine list of enhancement cases included in our Business Plan Submission and have highlighted any tensions and rationale for decisions taken. This have been shared with CCG in September 2023</p>
ODIs	<p>CCG would like to see risk profiles for ODIs emerging from Ofwat collaborative research and specifically what will mean for Thames Water Customers</p> <p>Thames Water response:</p> <p>Ofwat confirmed that companies need to adopt their ODI rates as part of the quality assessment. Originally this was being developed through industry collaborative research (and in June we shared with the CCG some of the implications of these rates. Ofwat subsequently adapted the methodology and have now issued modified top down rates which inform the ODI penalties.</p>
Plan narrative	<p>Importance of presenting the plan to show how customer and environmental needs and benefits complement each other rather than being viewed as two discrete issues.</p> <p>Thames Water response</p> <p>We have taken on board this feedback in the tone of the narrative write up, and have sought to reflect this in subsequent versions of the plan. However, we do</p>

Area	Feedback and Response
	<p>feel it is helpful to distinguish between customer (service) outcomes and environmental outcomes explicitly.</p>
<p>Cross cutting themes</p>	<p>Through the route to submission for wider CCG and Focus groups there is a need to highlight the crosscutting themes such as vulnerability, affordability, service improvements and longer-term plans irrespective of how the business is structured.</p> <p>Thames Water response:</p> <p>Recent engagement with the CCG and Focus Group have exposed our thinking on affordability and cross cutting issues such as asset deficit.</p>
<p>Resolution vs prevention focus</p>	<p>Importance to focus on preventing issues (e.g. get billing right) rather than problem resolution.</p> <p>Thames Water response:</p> <p>We agree with the CCG that prevention is better than simply having a smoother complaints / resolution process. This is why we are increasing our investment in addressing key service risks and tackling customer priorities around leakage and pollutions. We will be increasing our billing controls as a way to prevent issues happening in the first place as well as investing to improve our property data to ensure it is up to date and accurate and putting customers more in control of their bills through our smart meter rollout and improved self-service options.</p> <p>We will be reimagining our highest volume customer journeys to improve the customer experience and reduce the number of issues occurring as customers move through these journeys.</p>
<p>Use of consistent language</p>	<p>To help with transparency CCG would like us to use consistent language to show how the Customer wants / Customer Outcomes and enhancement cases to show how they relate.</p> <p>Thames Water response:</p> <p>This have been addressed through the What Customers, Communities and Stakeholders Want document v17. We will continue to review consistency across documents</p>
<p>Board assurance</p>	<p>To help with transparency CCG would like us to use consistent language to show how the Customer wants / Customer Outcomes and enhancement cases to show how they relate.</p> <p>Thames Water response:</p> <p>We have shared assurance framework including mapping Board assurance statement in Spring 2023 and held a session for CCG Chair with TW Board Chair, RSC and SCS Chair in June to discuss Board assurance. The new Chair will join the CCG on 7 September.</p>

Area	Feedback and Response
Customer engagement	<p>The importance to map key elements of the plan to WCCSW and to explain the shift between current performance and future targets (plus how does WCCSW influence decisions). Being much clearer and simpler on what our plans will deliver for customers.</p> <p>Explanation required to show how customers wants have been translated into Customers Outcomes and how they link to the proposed enhancement cases. Need to reflect on the priority weighting and ensure no elements have lost their focus/prominence (e.g. leakage)</p> <p>Some of the outcomes appear aspirational (e.g. Great Service) rather than the realistic ambition for AMP8</p> <p>Thames Water response:</p> <p>We have provided a mapping of simplified combined wants, and added our starting position on the performance commitments to provide context on the improvements our plan will deliver. We have updated our WCCSW v17 which includes new insight gathered since the previous version presented to the CCG in September 2022. We have also refined the structure and wording to reflect these new insights and to more closely align to the outcomes our customers expect us to deliver. an explanation of how we have refined the structure and consolidated the previous 15 Wants and 28 Expectations into 10 overarching customer Wants. We have updated wording following CCG feedback e.g. good service for all</p>
Affordability	<p>What are the consequences for customers especially around affordability if all compliant work needs to be delivered?</p> <p>Thames Water response</p> <p>As a part of the customer acceptability testing, one of the options we tested had all compliance/statutory aspects. These were shared with subset of the CCG w/c20/3. The CCG will recall the 'must do' plan tested with customers reflected the total costs of around £16.5bn (which was based on our estimate back in March of the cost of completing all compliance programmes in AMP8 (note since then those costs have increased). We do not currently have a scenario which can achieve delivery of all compliance activity in AMP8.</p>

Annex v. Detailed Schedule of CCG Challenges on Customer Research

Table 16: Detailed Schedule of CCG Challenges on Customer Research

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
Affordability & Acceptability Testing	Sample Sizes	Overall numbers of customers reached is less than 200. Obviously this is a tiny proportion of the overall customer base, but presuming that this is in line with Ofwat expectations/industry standards.	Sample sizes for qualitative research are usually small (50-100 participants), depending on the different types of people that need to be included within the discussions. The minimum sample sizes set by the Ofwat/CCW guidance are quite large compared to most qualitative studies, and as suggested in the guidance for a company of our size, we are going well beyond those minimums.
Affordability & Acceptability Testing	Sample Characteristics	In terms of the characteristics, although you are seeking a sample of people with health vulnerabilities, you are not specifically seeking a proportion of customers across the range of customer groups who may have a disability. ONS states that 17.8% of the England and Wales population are disabled, and 25.4% of households include one disabled member. (Data is available by local authority). Do you need to make more effort to obtain a representative sample which includes disabled people?	We believe the interviews with customers with health vulnerabilities will provide us with a good representation for this qualitative phase of the research, and we will apply the appropriate quota for 'Disability within the household' when we get to the quantitative survey in the summer. We also expect that we will naturally come across participants with disabilities (or who live in households where disabilities are represented) as part of the general recruitment for the face to face discussion groups, due to their general prevalence in the population. We will record the number of customers with disabilities as part of the recruitment process and we also plan to use accessible venues, materials, and procedures, to give disabled participants the best opportunity possible to be included.
Affordability & Acceptability Testing	Sample Characteristics	You are including ethnicity as a characteristic for the billpayers, but not for the other groups, and again wondered why not, given the proportion of customers with a minority ethnic background in the London region.	We will add ethnicity to the list of characteristics for the other groups and will aim to achieve good representation on ethnicity across the whole sample, ensuring all ethnicities are represented. However, it will not be possible to guarantee that each smaller group of 8 participants will meet the detailed specifications for gender, age, SEG, ethnicity, and disability – although we will aim for a good mix in each group.

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
Affordability & Acceptability Testing	Sample Characteristics	<p>The economic context has shifted, and that as well as customers who qualify for the social tariff, there will be customers at a range of income levels who are experiencing cost of living challenges. (eg the professions which are striking at the moment – teachers, NHS staff.) Given that affordability is specifically what we're testing, it's quite important to get a good span of incomes – the Resolution Foundation will have stats on income distribution in the UK.</p> <p>Disability should probably feature in your segmentation and a greater weighting towards bringing in more lower socio economic perspectives.</p>	<p>We think customers who are experiencing cost of living challenges across all levels of income will naturally appear in the sample, due to the large numbers of customers involved, the spread of Socio-Economic Grades and the financially vulnerable (social tariff) customers we are looking to recruit. The size of the incentive may also naturally attract customers who are currently struggling financially more than they used to. The recruitment questionnaire will include a question on how easy customers usually find it to pay their bills, and so we will be able to monitor how many of these customers are included in the sample.</p>
Affordability & Acceptability Testing	Sample Characteristics	<p>You explained that people who do not speak English will not have the opportunity to participate, and you were going to send us details of numbers/cost behind that decision.</p>	<p>Looking at the latest data on the latest ONS census map, Newham is the Local Authority District in our supply area with the highest percentage (8.1%) of people saying that English is not their first language and they either cannot speak English well or at all. With over 90% of people in all Local Authority Districts in our area saying that English is their first language or they can speak English very well or well, we do not believe it would be good use of time and money to translate recruitment and stimulus materials and potentially provide interpreters for the very small number of customers that could be included in the research. It is also worth noting that provisions for these customers were not included in the recent Ofwat collaborative research for PR24.</p>
Affordability & Acceptability Testing	Methodology	<p>There are different rates of incentive available to the different types of customers. Why aren't you paying a flat rate to all of them? It seems particularly unfair to pay those with health vulnerabilities £75 when others are getting £120/£160 although the time commitment is</p>	<p>We are using the suggested incentives in the Ofwat/CCW guidance, which are reflective of rates used for similar work across the research industry and are based on the time commitment and effort/inconvenience of each fieldwork method i.e. a 90 minute interview in your own home is less of a commitment and</p>

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
		different. Do you think it's justifiable? How would these customers feel if they knew they were receiving less?	inconvenience than a 4.5 hour workshop that involves travel to and from a venue.
Affordability & Acceptability Testing	Methodology	The approach to engaging customers with health vulnerabilities via interview rather than group exercise is good How does the research methodology for that audience vary and how will those responses be weighted (if at all) in the final analysis?	Qualitative findings are not weighted as the aim is to establish the range of attitudes and ensure all voices are heard. The main difference with the research methodology for customers with health vulnerabilities is in the delivery of the interview/collection of data. We will offer participants a range of methods to suit them, from face to face interviews at their home or at a neutral venue, to Zoom/Teams interviews at home, all of which allow interviewers to help participants to understand the research, in a location that the participant is comfortable with. We will also offer telephone interviews, which require show-materials to be sent by post in advance and offer the lowest level of interviewer support, and so can make the interview more challenging. The objective is to provide whatever the participant needs to be able to feel they are welcome and to facilitate inclusion.
Affordability & Acceptability Testing	Methodology	Supportive of your mitigation approach but given the very low sample sizes you require, why do you feel you may not get the level of engagement you are after.	It can often be challenging to recruit for participants for qualitative research with a large time commitment and where the subject matter is generally not a high priority for customers. The prescribed recruitment method of using our customer database, which contains very little demographic information (apart from PSR and social tariff status), will make it even more difficult to find the right mix of participants considering the various characteristics that need to be represented (age, gender, SEG, ethnicity, financial vulnerability, health vulnerability, etc). Added to this we also need to find participants that can travel to the venues and are, available on the specific dates and times of each event.

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
Affordability & Acceptability Testing	Methodology	It would be good to understand when in the week the face to face events will take place – daytime/evening/weekend, and how you can ensure that e.g. parents/carers are represented.	The 4.5-hour discussion sessions will start at 4pm. We have taken advice on dates and times from the experienced specialist recruitment partners working on this project, who weigh up these matters carefully. No day of the week, or time of the day, is good for everyone, so we must find a best fit for the customer we are trying to recruit. Part of the reason incentives for events of this nature are so high, is to make sure the financial cost of participating (e.g. alternative care arrangements) do not prevent people from taking part.
Affordability & Acceptability Testing	Methodology	In an ideal world there should be an additional session in London as your North/East and South/West will not give you sufficient breadth.	We have tried to choose locations that provide the best fit for the geographical populations we need to cover (Thames Water only and TW/Affinity) and the sample sizes we need to include in each session. The time and budget available will not allow an additional session in London.

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
WRMP Customer Research Proposal		Slide 2 - 100 customers is an extremely small sample of 10 million water supply customers (0.00001%). This cannot be considered to be representative.	<p>- The purpose of this qualitative research is to seek feedback from customers on the aspects of the draft WRMP where there are choices, in accordance with the 7 consultation questions on the draft WRMP. The output from the research will ensure the customers' voice is considered alongside feedback from respondents to the consultation, in the ongoing development of the plan.</p> <p>- The sample size of 100 is appropriate for qualitative research as part of which we will explore the topics and questions in some depth. We are not suggesting that this is statistically robust and we are not trying to measure, say, acceptability with a robust and statistical lens. However, with the sample size proposed we will be able to provide a measure of acceptability of the WRMP.</p> <p>- Alongside this research TW is also participating in WRSE led research, this is quantitative research and aims to seek customer feedback on the draft regional plan and alternative plans. The regional CCG has been engaged on this research. The sample size for this quantitative research is 1,900 household and 350 non-household customers. So we will take account of the findings of both the TW led qualitative research and the SE quantitative research in the refinement of the WRMP.</p> <p>- Also, it is worth noting that we have already undertaken research with customers which informed the development of the SE plan and in turn TW's draft WRMP, this has comprised both qualitative and quantitative research and is presented in Section 1 and Appendix T of the WRMP www.thames-wrmp.co.uk</p>
WRMP Customer Research Proposal		Slide 4 – the hosepipe ban is no longer in place.	Noted. The proposal was drafted pre Christmas and has been amended to remove reference to the Hosepipe Ban.

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
WRMP Customer Research Proposal		Slide 7 – is the split 78/22 London/home counties representative of your customer base, which is nearer 50/50 London/home counties? The resource options with the greatest impact on customers are in the Thames Valley so these customers must be fairly represented.	<p>- We have used the Water Resource Zone split in the sample design which is 78/22 London/Thames Valley respectively. The split can differ depending on the lens taken, so Greater London vs. outside London is around 60:40 for all household customers (TW), or around 70:30 for TW water customers only, and London WRZ, which doesn't match Greater London boundary and includes some areas outside Greater London it is 78/22.</p> <p>- Recognising that two of the strategic water resources schemes proposed in the draft WRMP would be located outside London, namely the South East Strategic reservoir and the Severn Thames Transfer, we could boost the sample of Thames Valley customers to reflect this but these schemes, alongside the other proposals in the plan, will be for the benefit of, and paid for, by the whole customer base which is important in defining the sample.</p>

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
WRMP Customer Research Proposal		<p>1. Pleased to see you proactively reaching out to customers who may otherwise not engage with the public consultation</p> <p>2. Why have you chosen a pop-up community over other qual methods e.g. focus groups, depth interviews?</p>	<ul style="list-style-type: none"> - Pop-up online qual communities have several benefits, not least being cost and time effectiveness. Using a pop-up community we can reach a far greater number of customers over much more diverse geographic regions than if we were using face to face or virtual discussion groups/interviews - The research can be conducted over a single defined time period (e.g. 5 days) whereas multiple focus groups (at least to get anywhere near the number of customers we are looking to engage with) would need to be spready over a number of weeks - The research approach is more flexible for customers – they can read and digest complex material in the comfort of their own home and respond in their own time around working / studying / household duties - The topic in hand is not something we generally want customers to come to a consensus on, or be influenced by others – we are looking for individual responses. In a discussion group setting you may have dominant or disruptive respondents that could influence or close down the discussion for others. This allows individual customers to provide their untainted views. We typically run these communities as one to one (like text based depth interviews) but we can go one to 100 or whatever number at a time, and easily filter and dissect them by demographics. The response content is then immediately accessible to all as transcripts (rather than multiple video recordings) and so far more accessible for analysis - If we think of a typical focus group as being 90 minutes with 8 customers and a moderator, take away (let's say) 15 minutes for introductions, moderator questions and pauses/irrelevant comments, then you have 75 minutes, which means less than 10 minutes of

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
			<p>commentary per customer. This doesn't take account of time taken to read and go through the material in the group, so as you'll see, for such a complex document, in a group or even interview setting, customers have very little time to consider and give their views. With a pop-up community, all of the time is given over to their response to documents/questions.</p> <p>- The online community setting allows us to present any form of stimulus, simple to complex, even allowing for annotation tools for customers to highlight areas of the plan that they find particularly compelling/difficult to grasp. When doing this as a one to many or a screen share in a discussion group or interview, this is much less effective</p> <p>- Experience shows that the level of detail and commentary received using this methodology is at least as good as, if not better than (for many of the reasons outlined above) that of discussion groups. I would say it is on a par with depth interviews, but at a considerable fraction of the cost when one considers the number of customers you can speak to at once.</p>

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
WRMP Customer Research Proposal		3. The consultant states the 100 respondents in a community is larger than usual. Do you know how many are usually engaged in these types of communities?	<p>- All research projects are different in terms of importance (regulatory submission or not, for example), complexity and type of responses and outputs required) and so the number of participants is chosen according to a variety of factors including target audience, budget and the need for diversity of voices</p> <p>- Most BAU projects we do are typically in the region of 20-50 customers, though for the bigger pieces such as this and some of the foundation PR24 and Vision 2050 work we have done, we have engaged over 100 customers to ensure we have strong representation</p> <p>- This is representation in the qualitative sense – we are not suggesting that this is statistically robust, as we are analysing the range of views on the topic, not trying to measure, say, acceptability with a robust and statistical lens. However, with a sample size of 100 we could still ask an overall measure of acceptability of the WRMP at the end to give us an indicative view (assuming that the sample makeup was representative of the whole TW region)</p>

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
WRMP Customer Research Proposal		<p>4. Qualitative research is not representative of the population of interest, and does not seek to be. Rather qual research is a deep dive with smaller samples. However, it is very important that sampling balances the different groups. Could you explain why the proposed sample is 'balanced' in terms of the groups that should be targeted in this deep dive research? Related, slide 2, states they will optimise sample validity - what does this mean in practice?</p>	<p>- We are aiming for the sample base to be as representative as we can in terms of the TW sample base broad demographics. The regional splits shown below will be built as close to the proportion of the specific WRZ as possible</p> <p>'- 'optimising sample validity' means that we will aim to represent as per the splits below as far as we can using the Thames Water Customer Voices community and then recruit externally for any gaps we have</p> <p>- We are always able to boost specific parts of the sample e.g. whether we want to boost the voices in areas where there are specific initiatives that will have an impact on a defined area – this is perfectly legitimate and is always up for discussion. Some feel we should overrepresent smaller sample groups that will be affected, other arguments suggest we should not as it skews the views of the customer base as a whole. We are always open to approaches any decisions made on sample makeup will be documented in the report.</p> <p>- As you know, qual research is not about measurement, but about highlighting what different groups have to say and all views will be represented fairly in any outputs</p> <p>Reference sheet name Demographic</p>

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
WRMP Customer Research Proposal		<p>5. In the proposal there is very limited explanation of how the pop-up communities will be implemented.</p> <p>a. Slide 2, the consultant states that 100 customers will engage with the community for around 90 minutes. While on slide 5, it states that the community will focus on different aspects of the consultation each day to allow participants to absorb the information and give considered answers. It would be useful to know:</p> <p>i. how is the 90 minutes spent - is the 90 minutes spread over a number of days? If so, how many days does the community last? Do the same customers participate in the community over multiple days?</p> <p>ii. If customers participate over multiple days - how does the consultant manage/mitigate drop-outs?</p> <p>iii. In the community, are all participants in the community at the same time? Do participants discuss the questions with each other in the community?</p> <p>iv. Do you incentivise customers for their participation and how do you do this?</p> <p>v. Assuming the community is online, how do you assist people who are not confident online to effectively engage in the community? How do you propose to include customers who are not confident in English?</p>	<p>i. This has been increased to 120 minutes, to be spent over 4-5 days' worth of activity, though we will keep the community open for roughly 10 days to ensure people have time to reflect and complete in their own time.</p> <p>ii. We generally over-recruit by 10-15% which tends to mitigate any dropout (response rates are usually pretty positive)</p> <p>iii. All participants will have access to the community for the same length of time and will receive reminders about completing activities. They will complete activities individually (see bullet 4 under point 2 above) although we may decide to open up for discussion once individual views have been given once we start to develop the materials, if we think it might add value.</p> <p>iv. Yes, customers receive a voucher for use at a variety of high street and online stores upon completion</p> <p>v. The community platform is built for simplicity and we also have a helpdesk manned by the moderators in the event of any issues. We rarely have any issues with accessibility and technical problems. We have also often had those for whom English as a second language and they are generally able to take part with no major issues. We are not proposing to include those that are barely online or that have difficulty with the English language – as with any other methodology, we would need to engage with these separately e.g. separate depth interviews, posting out the consultation document, bringing in native language moderators. We have not costed for this but can do so if required.</p>

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
WRMP Customer Research Proposal		6. Market research partners often use adaptive moderation. Namely the trained moderators ask probes in response to participants' answers. In the proposal it states light touch moderation - what does this look like in practice?	- Our researchers will probe responses, yes. This will be light touch in terms of making sure answers are as complete and well explained as possible – though we would not look to engage in longer individual discussions. By light touch we really means we will not be looking to have individual ‘conversations’ with customers; the AI analysis will be analysing responses to the big questions and so we want to avoid going off topic too much. But moderation will be comprehensive for the topics in hand. We tend to find with material like this we need to ask people to expend on certain bits of their answers.
Vulnerability Deep Dive Research		30/9/22, feedback on the research brief: Vulnerability Deep Dive Customer Research Brief CCG.docx Comments and responses in the document itself. CCG covered the main feedback points. There is a paragraph that refers to advocacy groups, CCG provided a short list of third sector ethnic minority organisations that work with vulnerable individuals/communities. Hopefully this list could be referenced or shared with the successful research company. It might be useful to identify and include some charities/faith groups that manage food banks”.	The list of third sector ethnic minority organisations referred to was added to the final research brief.
Vulnerability Deep Dive Research	Community Research	25/11/22, feedback on the research proposal from Community Research – following a meeting and emails from the assigned CCG focus group: Jeremy Crook, Charlotte Duke, Nisha Arora and Adam Jogie.	Feedback was shared with Community Research and discussed at the research kick off meeting with them.

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
Vulnerability Deep Dive Research	Background	Care should be taken with the point 'vulnerability/likelihood of suffering detriment due to TWs activity or inactivity' and how this is reflected and referred. (The CCG challenged that vulnerability may not result in detriment, vulnerability may be due to other factors and causation of detriment is not always down to TW).	Noted. What we ultimately mean on this topic is that services for those in vulnerable circumstances needs to be adapted to be inclusive, to create a level playing field for all customers. This research is about what we need to do for specific groups of customers where we need to act inclusively to prevent excessive detriment.
Vulnerability Deep Dive Research	Desk Research Literature Review	Desk research literature review: a challenge on whether this could be reduced (less than 5 days?) in order definitely not to re-package what is already known.	We ended up needing the full 5 days as there were so many new sources of insight to look at including several cost of living reports and the release of the 2021 census data to neighbourhood level.
Vulnerability Deep Dive Research	Desk Research Interviews	Desk research interviews with stakeholders and intermediary organisations: the CGG suggest food bank faith groups, local council representatives, debt handling agencies.	Noted.
Vulnerability Deep Dive Research	Sampling Framework	Sampling framework following the desk research: time should be factored in (at least a week?) for the CCG to comment on this and for iterations to potentially be made.	This was observed.
Vulnerability Deep Dive Research	Sampling	Already suggestions have been made about certain groups being represented because they make up large proportions of certain locations, eg: Eastern European communities. NB: the forthcoming availability of ethnicity and language data from the 2021 Census down to neighbourhood level will be very useful here, and CCG welcome exploration of this (and comparison to the equivalent 2011 Census data) as part of the desk research stage hopefully.	This was observed.
Vulnerability Deep Dive Research	Sampling	Another suggestion is to observe the difference in UK medium incomes for certain groups, eg: the prevalence of self-employed people in some groups (eg: working as taxi/delivery drivers).	This was factored into the interview screening questions.

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
Vulnerability Deep Dive Research	Primary Research Methods	The approach of offering an interview methodology to suit the respondent is very much favoured, but there's a concern that certain groups could be under-represented if you were for example to cap face-to-face interviews at a certain number because of cost impacts for the project.	We raised the PO for more than the agency quote to allow for any unforeseen dominance of a preferred engagement method different to the breakdown assumed in the agency proposal.
Vulnerability Deep Dive Research	Recruitment	The CCG could advise on additional intermediaries to use for recruiting certain groups, if needed.	We took the CCG up on this offer and the agency subsequently met with Jeremy Crook 14/12/22 to discuss.
Vulnerability Deep Dive Research	Ethnic Opinions	Is it possible to know the breakdown in diversity of their staff (their website just mentions languages covered but not other staff background info). The staff they contract varies with the assignments they have, ie: they match the background of interviewers to the audiences that are to be interviewed.	The staff they contract varies with the assignments they have, ie: they match the background of interviewers to the audiences that are to be interviewed.
Vulnerability Deep Dive Research	Interviewers	You mention using people with similar lived experiences to the respondents, but would this extend to those with different disabilities and other characteristics other than ethnicity/language?	Not practical unfortunately as there is a shortage of qualified interviewers with these characteristics.
Vulnerability Deep Dive Research	Topic Guide (when developed)	Please clearly show which research objectives are being met by each question/section of the guide – so it's easy to establish if the research will give Thames actionable insights.	Observed in the topic guide.
Vulnerability Deep Dive Research	Topic Guide	Could you include a question on what organisations/groups people look to for support or to represent their views on day-to-day issues (inc water).	Observed in the topic guide.
Vulnerability Deep Dive Research	Reporting	Remember to mention any background information that might have impacted the research (eg: time of year, weather, politics, general news, Thames Water in the news etc).	Noted.

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
Vulnerability Deep Dive Research	Interviewing Sampling Profile - feedback	14/12/22, feedback on the interviewing sampling profile - following a meeting and emails from the assigned CCG focus group: Jeremy Crook, Charlotte Duke, Nisha Arora and Adam Jogee.	A revised sample/approach framework document was shared with the CCG, addressing their feedback, the key revisions being: - 1) Balance of ethnic minority/white interviews – This has changed from 35/40 to 50/25 . We feel it is important to maintain some interviews with white groups (British and other, including recent migrants), to enable us to compare and contrast experiences of vulnerability risk factors across ethnicities. This will give us an indication of what needs and experiences are common to all participants facing various risk factors and which relate specifically to race, culture and ethnicity. 2) Clarification of objectives/what we'll use the research for - Our overarching objective is to understand what services customers need to help them live independent lives, so we can improve our current and future (PR24) plans, with ways to help customers with vulnerability risk factors. The impact on the sample is in targeting a range of specific communities to allow for patterns to emerge, indicating what needs and experiences are common or different for the various vulnerability risk factors.
Vulnerability Deep Dive Research	Interview Discussion Guide - feedback	9/1/23, feedback on the interview discussion guide – following emails from the assigned CCG focus group: Nisha Arora – “Only thing I can think of that might be worth adding is a question to help understand people's general financial situation (eg. level of financial resilience) and the communication channels they use/prefer/feel comfortable with”.	Added

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
Vulnerability Deep Dive Research	Interview Discussion Guide - feedback	9/1/23, feedback on the interview discussion guide – following emails from the assigned CCG focus group: Jeremy Crook – “Thanks for sharing the guide which is comprehensive. It does feel like a lot to get through and for customers whose first language is not English it might be challenging. Perhaps using words like 'anonymised' might be avoided. This may be just me - the question about who you live with? does feel a bit intrusive - could this be couched in terms of the size of your household?”	I’ll pass this feedback to Community Research, but just to reassure you... The discussion guide is more a prompt for the interviewer rather than an exact script for them to follow, so they won’t use the exact words in the document. Also they’ll hold the conversation in the customer’s main/preferred language (Community Research are using additional research partners with relevant language skills – Ethnic Opinions and ClearView Research – to conduct some of the interviewing). The intro questions including ‘who you live with’ are more of an ice breaker to get people talking and to set the scene. Customers will have been told “there are no right or wrong answers – please be open and honest, and share as much as you comfortable doing” so the interviewer won’t insist on an answer if the customer seems unwilling to talk about certain things.
Vulnerability Deep Dive Research	Research brief: Background Our rationale for deep dive research among customers in vulnerable circumstances	Unclear about the focus of the research. Here it suggests that the research should be focused on a sub-group of consumers in vulnerable circumstances, i.e. those who are excluded from comms and hard to reach. But the description below suggests a wider focus for the research on all vulnerable consumers.	Clarified this in a couple of places.
Vulnerability Deep Dive Research	Research brief: Background Building on existing insights and engagement	As you’ve done above when talking about limitations of previous research, it might be worth highlighting any limitations you consider might exist with your the current approach to obtaining insights, i.e. does it still leave gaps in insight/engagement, eg. with minority ethnic groups, or other consumer cohorts?	Added to the description of previous research.
Vulnerability Deep Dive Research	Research brief: Background Targeting the research to ensure it is	You’ve mentioned the Ofwat Guidelines later but, given their importance, it would be helpful to mention them earlier on in the document.	Done

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
	valuable and meaningful		
Vulnerability Deep Dive Research	Research brief: Background Targeting the research to ensure it is valuable and meaningful	Not sure what "this segment" covers	Description added
Vulnerability Deep Dive Research	Research brief: Objectives Research objectives	This should include exploring barriers to accessing these services and how access could be improved for customers in different situations of potential vulnerability. As you state below many customers do not know about the support available so the research should investigate how awareness can be improved (e.g. channels and formats) as well improving access to the services reducing frictions to access.	Added
Vulnerability Deep Dive Research	Research brief: Objectives Research objectives	Can you be really clear about how much detail the research is expected to go into on this? Customers may feel especially sensitive about income questions and how the data will be used. P	This would be basic income and spend on water questions - to establish eligibility for reduced tariffs
Vulnerability Deep Dive Research	Research brief: Methodology Who to include in the research	As well as low income, vulnerable customers could include those who work long hours, (are time-poor) and who are facing cost of living challenges (nurses, delivery drivers).	Added
Vulnerability Deep Dive Research	Research brief: Methodology Who to include in the research	What about older customers?	Added

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
Vulnerability Deep Dive Research	Research brief: Methodology Who to include in the research	As above, are we asking them to look broadly but then to focus in particular on those who are the most vulnerable to harm, or those who might have been missed in previous research, day to day engagement, etc? Do we want them to assess which cohorts they consider to be the most at risk because of multiple factors that indicate vulnerabilities?	More clarification added earlier
Vulnerability Deep Dive Research	Research brief: Methodology Who to include in the research	Do we want them to look at future customers at all, eg. Younger groups who may be vulnerable?	Added above
Enhancement Options Research	Enhancement Research	Positive to see TW has taken on board previous feedback from the CCG in the report. - CCG have provided constructive feedback based on Ofwat principles for customer engagement.	Thank you again for taking the time to so thoroughly scrutinise the enhancement options research. I've worked with my team and BritainThinks to consider and respond to the points you've raised. You will see that in some areas we seek to provide reassurance on the quality of the research and in others we agree there are limitations, some of which will be addressed in future studies.
Enhancement Options Research	Quant research	Slide 48 - no reporting on distribution of sample across geography. Can this be added? States the sample is representative of TW customers. Can TW provide the CCG with information to show how representative the sample is relative to the TW customer population. Was the quant sample weighted and if so how?	In response to your observations on sample design, we are working on a map to show the geographical distribution of the responses by postcode. I hope this will help demonstrate the representative spread achieved. On p19 of the research report we show the quantitative survey achieved the standard socio-demographic quotas as set out in our sampling approach document (previously shared with the CCG in July) to ensure the sample was representative of the Thames Water region. No weighting of the sample was required.
Enhancement Options Research	Quant research	Slide 48 - how were customers in vulnerable circumstances captured and those whose voice is often not heard in survey research? Not clear from the table shown on this slide.	
Enhancement Options Research	Quant research	Slide 37 - states beyond differences shown on this slide, no clear differences across key demographics e.g. ethnicity, age, gender, socio-economic group. Is TW confident that this is true and not due to sampling or design? For example, how did TW capture vulnerable	As well as ensuring the correct geographical distribution, quotas also ensured the sample included participants with various types of disability, older customers and customers in lower socio-economic

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
		customers in the quant research? Did TW consider a vulnerability boost in sample?	groups. In our August CCG paper we explained our rationale (which drew on CCW guidance) for not over-recruiting customers in vulnerable circumstance or those who are seldom heard in research in the enhancement options research. We will though focus on vulnerable/seldom heard audiences in the vulnerability deep dive research and boost them in the proposed plan affordability research, when the topics covered will be much more relevant to their circumstances.
Enhancement Options Research	Quant research	TW has considered external impacts on responses e.g. spills reporting in the media, announcement of CEO salary, cost of living pressures. But, the research was conducted in a dry summer how does TW think the findings may change if conducted in, for example, winter; or, a 'normal' summer. In other words, is there a consideration of seasonality effects?	Our sample design means we can be confident in the findings at an overall level and for larger subgroups. The survey included responses from a representative sample of Thames Water customers and had a margin of error of 2.5% based on a 95% confidence interval, which is within industry standards for quantitative research.
Enhancement Options Research	Quant research	Slide 53 - simulator. Why didn't TW test a 'do nothing' scenario for enhancements? Treasury Green Book requires assessment of investments are 'measured' against a do nothing baseline in order to 'value' the benefits of alternative investments. I recognise TW does not need to follow central government measurement approaches, but it seems one option that customers may want no 'enhancements' above statutory requirements and instead prefer bills to remain the same or to decrease. Indeed, this 'no enhancement' option was raised in the qual research.	To meet Ofwat's 'Useful and contextualised' and 'Neutrally designed' minimum standards, on p26 of the research report we have included an explanation of the wider context of the research and how this may have influenced customers' views. It is very difficult to say to what extent the findings from the research were influenced by seasonality, but we agree there is likely to have been some effect. This is a limitation with all stand-alone research where the fieldwork is completed within a defined time period.
Enhancement Options Research	Quant research	CCG recommend TW engages an independent expert to review the choice card design and implementation of partial profile approach (p 111), it would also be good for someone to look at the statistical robustness of the samples size i.e. what is the level of confidence based on the choice experiment design.	With regard to the options presented to customers, the absence of a 'No enhancements' option is a deliberate limitation of this research and we have noted this in the report. We will address this insight gap in early 2023 through our acceptability & affordability testing and/or research to test our Long-term Delivery Strategy.

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
Enhancement Options Research	Quant research	<p>It is unfortunate that the research was rushed due to late delivery of the materials required to design the choices/packages. This meant TW could not benefit from sequencing of qual and quant e.g. running qual to inform the quant design. Also, the CCG was unable to comment effectively on sampling for the quant and did not have an opportunity to see the quant design before it was launched.</p>	<p>In designing the research, we relied on advice from BritainThinks. This outside expert advice constitutes one of our first lines of assurance. Further independent expert assurance of our engagement programme and constituent research studies will take place in April 2023. I would expect the independent experts will wish to examine methodology choice, design of research materials and statistical robustness.</p> <p>Finally, you are quite right to say that ideally we would have had more time to carry out the research and allow the qualitative feedback to inform the quantitative survey to a greater degree. That said, all materials and the survey questionnaire were cognitively tested with customers and improvements made based on the feedback. The sampling criteria for both the qualitative and quantitative elements were shared with the CCG in July before fieldwork took place. We will ensure the CCG can comment on sampling and quant survey design for future research projects.</p>
WRMP Customer Consultation		<p>CCG comments received during meeting with Thames Water and Verve on 2/3/23: from Tanni Grey Thompson and Doug Taylor</p> <p>Ensure these questions are covered: Supply vs demand side solutions - -Balance preferred</p> <p>Supply side - consequences of not acting vs over delivering and wasting money</p>	Action completed.

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
WRMP Customer Consultation		<p>CCG comments received during meeting with Thames Water and Verve on 2/3/23: from Tanni Grey Thompson and Doug Taylor</p> <p>Water is essential for everyone (1.3) Throughout- make large numbers and %s easier to understand – visualise</p>	Action completed.
WRMP Customer Consultation		<p>CCG comments received during meeting with Thames Water and Verve on 2/3/23: from Tanni Grey Thompson and Doug Taylor</p> <p>Protect the environment (2.2) Can we make this text more balanced so people can feel comfortable to reject if that's their view.</p>	This wording was lifted directly from the consultation but the question wording in the discussion guide was more balanced.
WRMP Customer Consultation		<p>CCG comments received during meeting with Thames Water and Verve on 2/3/23: from Tanni Grey Thompson and Doug Taylor</p> <p>Case study on chalk streams to go here - slide 14 in pack</p>	Action completed.
WRMP Customer Consultation	Using water wisely	<p>CCG comments received during meeting with Thames Water and Verve on 2/3/23: from Tanni Grey Thompson and Doug Taylor</p> <p>Make the most of available water (3.2)</p>	Action completed.
WRMP Customer Consultation	Smart Meters	<p>CCG comments received during meeting with Thames Water and Verve on 2/3/23: from Tanni Grey Thompson and Doug Taylor</p> <p>Make the most of available water (3.3) Explain why meters help save water</p>	Action completed.

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
		<p>Visualise 13% Express as number of showers for example</p>	
WRMP Customer Consultation	Reducing leakage	<p>CCG comments received during meeting with Thames Water and Verve on 2/3/23: from Tanni Grey Thompson and Doug Taylor</p> <p>Make the most of available water (3.4)</p> <p>Add case study Including information about barriers to fixing leaks</p> <p>About a quarter rather than 24%</p>	Action completed.
WRMP Customer Consultation		<p>CCG comments received during meeting with Thames Water and Verve on 2/3/23: from Tanni Grey Thompson and Doug Taylor</p> <p>Make the most of available water (3.4)</p>	Action completed.
WRMP Customer Consultation		<p>CCG comments received during meeting with Thames Water and Verve on 2/3/23: from Tanni Grey Thompson and Doug Taylor</p> <p>Other solutions that have been considered</p> <p>Include what options were considered in the building of the plan. Why desalination not included for example</p>	Action completed.

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
WRMP Customer Consultation		<p>CCG comments received during meeting with Thames Water and Verve on 2/3/23: from Tanni Grey Thompson and Doug Taylor</p> <p>Slide (4.2) Add rationale for this order</p>	Actioned (taken from consultation)
WRMP Customer Consultation		<p>CCG comments received during meeting with Thames Water and Verve on 2/3/23: from Tanni Grey Thompson and Doug Taylor</p> <p>A new reservoir in Oxfordshire (4.4) Will we be able to look at responses to these resource questions based on participant's proximity to the locations</p>	Yes
WRMP Customer Consultation		<p>CCG comments received during meeting with Thames Water and Verve on 2/3/23: from Tanni Grey Thompson and Doug Taylor</p> <p>The plan must be affordable (5.2) Mention here that impact on bills will also be impacted by other issues such as the cost of future wastewater investments needed for a reliable service that protects the environment. These amounts are just for future water resources investments.</p>	Action completed.

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
Enhancement Case Research	Materials Review	How do the enhancement cases tested in the research relate to the three business case plans being considered by TW? The 'least cost/must do plan', 'proposed plan' and 'alternative plan'. These plans are expected to increase customer bills by between 39% and 42%. How do the enhancement cases interact with the plans and are these enhancement case included in the expected bill rise?	<p>This is how the 8 enhancement cases relate to the three plans being tested in the Acceptability & Affordability research:</p> <p>Enhancement case / Acceptability & Affordability Test plans</p> <ol style="list-style-type: none"> 1) WINEP - improving river health Included and highlighted in all 3 plans, but at a slower rate in the Alternative plan. 2) WINEP - Reducing sewage spills to rivers - Included and highlighted in all 3 plans. 3) Improving resilience to sewer flooding in homes - Included and highlighted as discretionary enhancement in Proposed and Alternative plans only. 4) Sewage treatment growth - Included in total bill impacts for all 3 plans but not highlighted due to lower individual impact on bills 5) Infiltration reduction - Included in total bill impacts for all 3 plans but not highlighted due to lower individual impact on bills 6) Improving water supply resilience - Included and highlighted as discretionary enhancement in Proposed and Alternative plans only. 7) SEMD (Security & Emergency Measures Direction) - Included in total bill impacts for all 3 plans but not highlighted as is a statutory enhancement with lower individual impact on bills. 8) Basement flooding from trunk mains - Included and highlighted as discretionary enhancement in Proposed and Alternative plans only.

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
Enhancement Case Research	Materials Review	<p>It is unfortunate that due to timing the community materials and the quantitative survey will be cognitively tested by VERVE employees. You plan to soft launch and use 20-30 of the quant as a pilot but this is not optimal. Can you reconsider a pilot for the quantitative survey and a few cognitive testing interviews for the community?</p>	<p>The online community involves one-to-one moderation for each participant, so Verve will quickly pick up on any problems in comprehension or interpretation of the materials/questions, answering any such queries directly with the participant and also remedying the materials (if required) for other participants. There will be a phased starting time for the participants so the first to start answering questions will act as a proxy in lieu of formal cognitive testing.</p> <p>The quantitative survey will have a soft launch phase so that the first 100 interviews (c.75 households and c.25 non households) will be reviewed to check the survey is working. We felt that a pilot was not required as the background and question text in this survey will be heavily based on the online community materials/questions, which itself will have been tested before the quantitative survey is underway.</p>
Enhancement Case Research	Materials Review	<p>Have you considered neutrality across the options? For example, slide 14 trunk main bursts. The slide includes magnitude of harm i.e. deaths, insurance claims, a quote about an old person who could potentially drown. Your other options sewage treatment work upgrades, sewer infiltration are not framed in these terms. The trunk mains is very emotive but the other options are not. Have you thought about the framing of impact and harm across the options and try to ensure these are neutral as possible across the options tested? There are more visuals in the community guide, but a review to ensure a balanced approach may be helpful.</p>	<p>We agree with your point here and we've removed that quote from the trunks mains bursts materials for example. As the materials evolved for all 8 cases we took neutrality into account and aimed for a similar structure and tone of information across them all.</p>

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
Enhancement Case Research	Materials Review	Please provide more detail on how you will use the quant sample. Will respondents answer questions on all 5 cases? Can you consider increasing your sample size? How do you define future bill payer?	The quantitative sample of 1000 households, 50 future customers (defined as 18-24 and not yet responsible for paying the water/waste bill), 200 non-households and 100 non-digital customers, we consider to be robust for this research, and will allow us to explore any differences by key subgroups. Respondents will answer 2 closed questions on each enhancement case. So yes, dual water and waste customers will answer questions on all 5 cases. Waste-only customers will answer questions on the 2 waste cases included.
Enhancement Case Research	Materials Review	When is the community going into field and when is the quant survey launch?	We are aiming to launch the community on Monday 17th April (slightly delayed from our original plan so that we can ensure bill impacts align with the Acceptability & Affordability research). The quantitative survey will launch on Wednesday 19th April.
Enhancement Case Research	Materials Review	Email 13/04/2023 - Using the first interviews to modify (if necessary) the subsequent interviews appears unusual - if modification is required, ask your supplier to set-out in the method section how this is/was done. This will ensure transparency in design and implementation of the qual fieldwork.	Email 18/04/2023 - I will share your feedback with our researchers for this project (Verve) and ensure they detail in their final report the considerations taken with the research set-up, sampling and interviewing process for this project. The quantitative survey is being run online and via telephone (for digitally excluded customers), both will recruit from existing market research panels and listings, rather than via social media or random dialling for instance. I'll check that Verve are being vigilant for outliers within the soft launch.
Enhancement Case Research	Materials Review	Email 13/04/2023 - Thank you for considering CCG feedback on neutrality. Given the timing available CCG could unfortunately not review the full text of the depth interviews. Again a suggestion is to detail in the method section of the report how neutrality across the framing of the options has been considered and ensured in the interview guide design and the quant survey.	Next week Verve will give you access to observe the online community (qualitative research), I'll let you know when this is set up.

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
Enhancement Case Research	Materials Review	Email 13/04/2023 - In regard to sample size for the quant survey there should be discussion on why the sample size is considered robust including consideration of confidence intervals for different sample sizes (aggregate and sub-sample).	
Enhancement Case Research	Materials Review	Email 13/04/2023 -The soft launch of the quant survey is 2 days after you start the qual interviews. This does not give you a lot of time to learn from the qual to inform final design of the quant (which you state below is why you consider a pilot not necessary). CCG suggest being clear about the checks you have done on functioning and understanding of the quant survey questions. CCG don't know what techniques you are using in the quant survey as this has not been shared with us. But look out for potential protest votes or other outliers in your soft launch.	
What Customers, Communities and Stakeholders Want document	Document review	CCG challenged the wording of customer priorities and whether the new version included enough emphasis on the importance of leakage	Following challenge from CCG the AMP8 Outcomes wording have been updated to reflect the importance of leakage
Enhancement Case Research	Enhancement Research	TW to share more information regarding how views of digitally excluded, future customers and customers with health issues are included in the business plan	Future editions of What Customers, Communities & Stakeholders Want will separate out the insights from these segments.
LTDS Customer Research		Re-using existing customers who participated in the AAT research seems sensible on the one hand, but their depth of knowledge will be considerable compared to future customers; might that make their relative responses less comparable?	It will make the analysis a bit more challenging, but we will provide a pre-task for the future customers similar to that used in the AAT research to bring them up to speed. Future customers tend to have less to say in this sort of research and are quicker to explore the topics as they bring fewer preconceptions into the discussion. This should give us more time to spend on recapping the pre-task and contextual info, as well as taking more time to explain the various elements of the LTDS if required.

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
LTDS Customer Research		The total sample size for this research is c.60 customers (50% current/50% future) and c.16 businesses. Seems pretty small and therefore findings may not be able to be heavily relied upon?	As this is qualitative research it is not intended to be a statistically reliable, representative sample. It will give us the opportunity to explore the topics in a lot more detail and understand the range of attitudes that exist and the reasons behind these views. The findings will give us an indicative view on the mix and sequencing of the key investments in our LTDS and whether customers find the cost of our proposals to be fair and affordable now and in the future. These findings will be assessed and triangulated using our insight triangulation process and form an important final step in the line of sight for our LTDS.
LTDS Customer Research		If and how the CCG is going to be able to get a feel for the in-depth interviews with larger business customers (sight of transcripts?)	Due to the size of the groups (2-3 NNH customers) the CCG will not be able to observe the sessions live, but we will aim to make recordings of the session available to the CCG. This is not now going to happen, owing to data confidentiality issues. Prompted by the CCG, TW revisited the research to draw out any differences that it threw up between smaller and larger business customers. These have been given greater emphasis. TWacknowledged that the CCG should have been enabled to have had a clearer line of sight on this aspect of customer research.
LTDS Customer Research		CCG recognise this is online focus group but are you using the same agency on materials and facilitation as the previous research which this builds upon?	Yes – Accent are completing this research for us, using some of the same facilitators as the acceptability and affordability work.
LTDS Customer Research		Given the recent press coverage of Thames Water how will you contextualise this if at all. Will you be introducing facilitation materials on this?	This is a valid concern and, as with all our research, the context and timing of the fieldwork will have an influence on customer perceptions of Thames Water and their views on our proposals. Unfortunately, we don't have time to wait until the recent media coverage has reduced or is at least less prominent in customers' minds. It will be important for Accent to maintain their independence and not risk being perceived to be producing excuses or trying to defend Thames Water. Introducing additional stimulus materials would highlight the issues and risk the

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
			discussions being side-tracked, but we will make sure Accent have explanations and answers to likely questions from customers.
LTDS Customer Research	Material review	Slide 26 bill phasing. In absence of any scales consumers may view bill presentation differently . Option 1 suggests 20 years of low increases after initial rises peaking at a point equivalent to cost in option 2 and 3 in 2040. Consumers may have a false perception if they cannot evaluate real impact of the graphics.	These charts are built with hypothetical bill amounts that don't reflect reality. We are aiming to get customers to think about the principles involved, rather than the £ amounts, but I have added the scale to help customer understanding.
LTDS Customer Research	Material review	Impact of inflation bullet 4. Household income rising does not necessarily create more household headroom. There could be a whole host of other household costs rising eg new student fees for a household, children marrying, which are not impacted by inflation.	We have borrowed the text of these bullet points from the Ofwat AAT guidance, but I have added the following to bullet point 4: 'However, other household costs that are not impacted by inflation (e.g. new student fees for a household, children marrying) may also rise and reduce the amount of extra money to go around.'
LTDS Customer Research	Material review	Does option 1 mean in 2050 customers get the same outcomes as in option 2 and 3, but bills are lower under option 1 in 2050 because some investment is brought forward? The graphs on slide 27 seem to say this to me.	Yes that is correct.
LTDS Customer Research	Material review	Consider how you present slides 29 to 31. Option 1 is a screen full of green ticks compared to Option 3 which has a lot of red crosses. Behavioural insights research shows that presenting people with green ticks they are more likely to choose this option rather than the colour red. Check for design bias in presentation and consider how to verbally present the options to mitigate design bias. The same applies for wastewater options.	We have replaced the ticks and crosses with text boxes – see examples below. (Slides can be found on tab labelled Option Examples).

Project'	Project Sub Heading	CCG Feedback	Thames Water Response
LTDS Customer Research	Material review	Slide 37 to 40 - include the average bill in 2023 so it places in context the future bills. Average bill for 2023 added to the slides.	Average bill for 2023 added to the slides.

Annex vi. CCG Challenge Log by Outcome

Since the appointment of CCG in January 2022, Thames Water and CCG engaged on regular basis to enable CCG to constructively challenge Thames Water on:

- The quality of Thames Water’s engagement with the customers, stakeholders and communities they serve
- The extent to which customers priorities are reflected in what Thames Water do, and
- Thames Water’s delivery against those priorities.

The following slides provide summary of the ongoing engagement between CCG and Thames Water taking into account detailed challenges, in depth comments and requests for actions CCG made since January 2022 when they were appointed. The summary is grouped around CCG five priority themes and desired outcomes listed below. CCG have made sure that all topics suggested in Ofwat guidance are covered by their engagement:

- Inclusivity (customer service)
- Choices (significant investment)
- Performance (customer service, water and wastewater service)
- Affordability (bill impact)
- People

This document is a working document which will continue to be updated on regular basis and CCG is responsible for the information included in the document and its publishing with Thames Water responsible for providing responses to the challenges.

CCG report includes Annex v with detailed challenges on Customer research and Annex iv with PR24 specific challenges which were raised as a part of the ongoing engagement.

Priority Theme: Inclusivity

Outcome: Thames Water understands and responds to the diverse needs of current and future customers, in particular those who are generally less heard from

Success: Thames Water take incremental steps in its research strategy, to understand generational and ethnographic differences and needs and apply knowledge to inform and enhance TW’s list of stakeholders and its assessment of customer journeys and approach to inclusive service.

How did CCG challenge / ways of challenge	Thames Water response	Impact and next steps
<p>In January 2022 CCG requested TW to explain how it will ensure that customer research / feedback includes views from customers who are generally less heard from / customers in vulnerable circumstances</p>	<p>Since the establishment of CCG in January 2022 we have continuously engaged and invited challenge on all aspects of our extensive engagement programme through which we have developed a comprehensive understanding of customers' and communities' needs, priorities and concerns.</p>	<p>1. Moved TW from a broad approach to vulnerable customers to consider more the existence of specific communities whose views and challenges are often not heard. These include ethnic groups that may have additional barriers such as language that hinder their take up of financial support or ability to use 'mainstream' channels of communication.</p>
<p>In February 2022 CCG asked TW to share more details on equality, diversity, and inclusion in the overall approach to engagement and participation in a future meeting.</p>	<p>We have adopted a best practice insight triangulation approach and created our comprehensive What Customers, Communities and Stakeholders Want document (W. The iterations of this document have been shared with CCG.</p>	<p>2. CCG challenged the existing list of community stakeholders and partners. This has not fully been translated into TW reaching out to the list of mainly ethnic minority community hub organisations we provided and the list being expanded on the TW website.</p>
<p>In May 2022, CCG asked TW to share customer segmentation and customer research sampling approach including non household customers and future customer, and include explanation of how it aligns to demographics and enables insight from silent majorities</p>	<p>In response to CCG challenge on expanding our understand of our vulnerable customer base, we have commissioned bespoke vulnerability research. The CCG Vulnerability focus group were involved throughout the development of this research and helped shape the sample make-up, which ensured we targeted specific minority ethnic communities, helping us generate more tangible and meaningful insights. The outcomes of the research will be included in a future iteration of What Customers, Communities and Stakeholders Want (WCCSW) to ensure the findings are triangulated alongside other insights.</p>	<p>3. Following challenge to the research methodology which was in line with the regulator's guidance, but which needed to be more relevant and engaging of TW ethnically diverse customers base, a booster sample was added to reach more ethnic minority customers/public and an ethnic minority research firm was sub-contracted. We will now want to see TW build on this and take further steps to understand generational and ethnographic differences and needs and apply this to expand its stakeholder list and inform its approach to customer journeys.</p>
<p>At planning stages for Your Water Your Say session (Jan – April 2023), CCG challenged TW to explore opportunities for wider outreach especially to the communities who are usually harder to reach</p>	<p>We have acted on challenge to individual research projects regarding customer sampling, for instance we now conduct non-household discussions completely separately to household ones, following CCG feedback that there is sometimes a tendency for individuals to answer questions as a householder rather than on behalf of their business.</p>	<p>4. Effective implementation of Customer focus licence condition</p>
<p>In June 2023 CCG requested for TW to provide a summary of the external context (media, weather etc) that may have influenced views captured in customer research and explain how this has been taken into account in the insight triangulation process</p>	<p>We also recognised that while future customers are included in our sampling methodology, more could be done and commissioned additional customer research with future customers, including on our long-term strategy.</p>	
<p>CCG provided detailed challenges on specific Customer Research projects through their appointment (Please see Annex v Detailed schedule of CCG Challenges on Customer Research of CCG report)</p>		

Outcome: Thames Water understands bill impacts on all of its customers and their expectation of fair and affordable bills, especially in the context of the cost of living crisis, and this is reflected in TW's business plan and in its support for customers

Success: A successful outcome will be that CCG is assured that Thames Water has considered and taken account of customer needs in its approach to affordability support including Priority Services Register and innovating social tariffs.

How did CCG challenge / ways of challenge	Thames Water response	Impact / next steps
Deep dive on bill accuracy including Bill strategy to be included on forward plan	We engaged with CCG regular basis to build on their understanding of our vulnerability strategy including different support we provide for customers in vulnerable circumstances.	Pilot new Social tariff
In September 2022, CCG vulnerability focus group session was held to discuss: the financial aspects of the Frontier Economic research and its financial implications; Single Social Tariff including any information on potential pilot scheme; understand what business would be as usual and what would CCG expect to see in the Business plan as a result; View whether there anything specific in London poverty map which may warrant any potential specific ODI to help ensure that needs of the most vulnerable are adequately met	Throughout the process we have welcomed the engagement with Vulnerability Focus group and their expertise as well as the wider CCG to challenge and validate our plans.	Effective implementation of Customer focus licence condition
In October 2022, CCG asked TW to use internal analysis to assess the impact of a potential move from low income to the 5% criteria and use this to engage external stakeholders on an approach if the legislation goes ahead.	We will publish our PR24 commitments including the ones linked to vulnerability following Final Determination.	
In February 2023, CCG suggested to TW that they reflect internally and as a part of the industry working group whether TW will communicate to customers their internal vulnerability commitments.	In response to CCG recommendations', we have conducted robust analysis to identify customers who are currently eligible but may not be in the future, allowing us, and others, to understand the customer impact.	
Subset of our CCG have scrutinised our Affordability and Acceptability Testing (AAT) through the full process. To date they have challenged Thames on the Sample sizes, samples characteristics and research methodology. Engagement on this will continue through both stages of AAT	In September 2023 we have engaged CCG on the final proposals included in the Business Plan submission.	
In May and June 2023, CCG suggested that TW will look at available data for customers who are currently eligible for Thames Water's social tariff but may not be in future and share further insight and share it with CCG at future meeting		
In summer 2023 CCG had the opportunity to review and comment on customer research focusing on the potential use of innovative tariffs to increase the available funding to provide wider affordability support to customers.		

Priority Theme: Choices

Outcome: Thames Water's criteria incorporate, and respond to, the needs of different stakeholders and customer groups in strategic decisions for the longer term

Success: The Business Plan shows a clear line of sight between the investment decisions and What Customers, Communities and Stakeholders Want

How did CCG challenge / ways of challenge	Thames Water response	Impact and next steps	
In June 2022 CCG requested an assessment of the current view of 15 Wants published in What customers, communities and stakeholders want document (v15 p4) to show which are part of the statutory requirements	Challenges articulated in this section have been broadly covered through engagement with the PR24 focus group and updates provided to the main CCG. We continue to work with PR24 focus group to expand on their understanding of PR24 development including detailed challenges outlined at the Appendix to the Challenge log	Enhancement options reflect harm/detriment to customers.	
In September 2022 CCG challenged TW to share more details on the process of how TW navigate through tension points in decision making throughout the development of PR24. This has a been key ongoing challenge		June 2023 the CCG Business Plan Focus Group raised this point again with Thames Water. Thames Water responded that as part of the business planning detriment and harm is taken into account. Thames Water presented the example of trunk mains, that while this may not be a key priority of customers the potential harm to customers affected is substantial and this is accounted for in investment choices.	
In September 2022 CCG requested a meeting to be arranged for Choices focus group to discuss discretionary spend over and above the statutory requirements in line with WINEP, approach to engineering and other solutions, and sequencing aspects.	In terms of line of sight, We have engaged with CCG on regular basis to build on their understanding in this area. In February 2022 we have shared our approach to triangulation and Line of sight framework. In October 2022 TW shared their Line of Sight document developed as a part of the PR24 silver phase. The document included sections on how we engage with customers and how we reflected customers' views in the silver plan. This document provides an initial mapping from Customer outcomes through customer expectations, key AMP8 commitments to the relevant parts of the plan. We continued to share the next stages of the line of sight in Spring / Summer 2023 with the CCG as a part of the Gold phase.	Further information on triangulation and Line of Sight to be shared with the CCG in July 2023.	
In October 2022 CCG asked TW to consider if neutral assessment work to look at distribution of the detriment of a do-nothing option might be helpful		In June/July 2023 questions have arisen on the impact of funding and deliverability of options including impacts on consumers (including any bill impacts).	
In October 2022 CCG requested TW to share input or insight from finance and operational teams on their perspectives of what to prioritise for customers in the business plan. Linked to options and cost benefit analysis.		In September 2023 we have shared further iterations of our Core narrative and Technical Appendix Approach to engagement to demonstrate the Line of sight in our Business Plan Submission.	
In October 2022 CCG asked TW to provide more clarity on base vs enhancement and double counting – CCG noted that SKS has asked CCW to provide a workshop on scrutinising financial plans.			
In October 2022 TW requested for TW to provide cost/benefits of the choices and the time horizon (laddering) and potential impact of new technology. This includes understanding what is prioritised for AMP9.			
In January 2023, the TW CEO suggested that CCG forward plan include session on Asset Health and its links to wider turnaround plan from Asset Director and her team.			
In Spring 2023 CCG provided detailed challenge on Enhancement cases customer research			
Throughout the engagement process, CCG challenged TW to provide details on the following points. - The criteria and process TW has used to make decisions on the outcomes to be delivered as part of the AMP8 plan - How customer insight fits into this process and what influence it has on decisions - How TW has dealt with the tensions and divergence between the views from different customer groups in decision making			

Outcome: In delivering its performance outcomes, TW reflects customer interests, improves environmental awareness and engages with wider and political issues important to citizens and communities.

Success: TW are demonstrably more proactively engaged in the media, of all forms on issues of wider customers' interest

How did CCG challenge / ways of challenge	Thames Water response	Impact and next steps
<p>CCG challenges TW performance through Quarterly performance meetings where the discussion focus on key performance metrics which have highest impact on customers such as leakage, supply interruptions, sewage flooding, pollutions, C-MeX etc</p>	<p>We engage with CCG our performance on quarterly basis, sharing our current performance as well as engaging on our plans to improve it and value CCG's challenge in this area.</p>	<p>Publication of the EDM and other data sharing</p>
<p>In October 2022, CCG asked TW to clarify current level of risk on CRI breaches and how is that projected to change over a given timeframe.</p>	<p>To build on trust and transparency we proactively engage with Customers , stakeholders and communities via various stakeholder newsletters, website, social media, emails and media campaigns such as water efficiencies, drought/hosepipe bans and investment in the water network/fixing leaks. In addition we have proactively started to share live data on sewage discharges although this was expected to have a negative impact on perception.</p>	<p>We will monitor reductions in social media references to billing & payments, leaks and burst pipes, and sewage against a 9-22 Jan benchmark</p>
<p>In November 2022, CCG challenged TW on their approach to responding to media and requested for further details to be shared on comms including social media, connections on the ground including local resilience forums and how the comms work between TW and Local Authorities.</p>	<p>In order to share with our CCG our work in our community, we share corporate responsibility weekly summaries which highlight how we engage with our communities. We also run educational campaigns influencing customers behaviours (e.g. ways to save water, Bin it don't block it)</p>	<p>CCG is looking for evidence of customers' water conservation in response to TW campaign</p>
<p>In February 2023, CCG requested more details around smart metering and Smart Home Visits (including customers in vulnerable circumstances</p>	<p>In response to CCG challenge around how TW should think proactively around responding to various issues, the team is now coming up proactively with eight different scenarios to help to identify when to take action.</p>	
<p>In February 2023 TW presented their approach to communicating their performance to customers including action plans for improving certain metrics. CCG asked TW to explore the feasibility to regional reporting which could be published on more frequent basis as currently only reported twice a year.</p>	<p>As a part of our performance reporting we publish our annual performance alongside of specific more frequent reports on specific metrics including our targeted action plans to improve performance. These can be seen found at Performance About us Thames Water</p>	
<p>Following from various discussions around communication workshop was held in February 2023 to allow CCG to challenge TW Social media strategy and Gain input on how Thames Water can better serve our customers on social media</p>		
<p>In June 2023 CCG requested TW to share more details around public perception regarding visible and non-visible leaks</p>		
<p>In June 2023 CCG requested further information around known leaks and fixed leaks to get a better understanding of company performance</p>		
<p>In June 2023 as part of quarterly performance reviews, CCG asked TW to share list of Wholesale and Retail KPIs with internal targets and actions plans with progress at the next performance meeting and share outcomes of review completed by Baringa</p>		
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Priority Theme: People

Outcome: Thames Water's workforce, culture and profile means that Thames Water better understands and interacts with its customers, wider society and local communities.

Success: Employees' engagement survey responses show improvements among groups with protected characteristics.

How did CCG challenge / ways of challenge	Thames Water response	Impact / Next steps
<p>Since CCG got appointed in 2022, CCG developed a useful relationship with HR and challenged where appropriate, CCG recognised that there is good HR diversity and inclusion work going including workforce diversity monitoring. Thames Water recognise that there is underrepresentation in relation to ethnicity, gender and disability in operational areas of the business and CCG welcome the efforts being made to increase the diversity including setting targets for apprenticeships. CCG would like to see Thames Water to use more inclusive language when describing diversity.</p>	<p>Thames Water welcomes CCG engagement in this area. To expand the understanding of the diversity at TW employee networks Thames Water shared the overall culture, inclusion and engagement strategy within Thames Water. The overall mission of this strategy is to build an inclusive culture and working environment that inspires people to live our values; respecting and valuing everyone.</p>	<p>Progression of analysis correlation with customer experience and staff satisfaction.</p>
<p>CCG asked TW to share more information on link between employees culture and engagement with Customer outcomes</p>	<p>In addition, CCG representative is invited to attend REACH network (Racial Equality and Cultural Harmony Network) whose mission is to provide support and practical recommendations to ensure Thames Water is a company where there is no under-representation of talent, where people from different backgrounds and ethnicities feel able to and do join and flourish together.</p>	
<p>In June 2023 Linking customer service and company culture and recent "hear for you" employee engagement <u>survey</u> and look at the correlation between employee engagement and customer satisfaction.</p>		
	<p>In absence of metric, the company is completing analysis which review the correlation between customer experience and staff satisfaction. This will be shard with CCG due course</p>	

