



Vulnerability Strategy

Providing an inclusive service

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1. Executive summary

This document sets out our Vulnerability Strategy for household customers and how we will:

- Provide an inclusive service and extra support to those who need it, helping our customers live independent lives in their own homes and reduce the risk of harm as we deliver our services.
- Continuously improve our inclusive service approach for those needing Extra Help with a 30% increase in the number of tailored propositions.
- Grow our Priority Services Register (PSR) to 36% of the eligible population by 2030, at 1.2 million of 2.9m eligible households, with ways of working that maintain this growth until we reach a steady state.
- Engage those who are underrepresented through a combination of data sharing and community campaigns. By analysing data to identify underrepresented customers and partnering with third party organisations we will ensure our propositions reach those that are not aware of the support that would help them due to barriers such as language and culture.
- Continue our partnership working approach with 3rd sector organisations and consulting with CCW, to inform our propositions and extend the reach of our services.
- Align with Ofwat's expectations set out by the [Vulnerability Guidance](#) that underpins our customer focussed licence condition.

We recognise that there is some overlap between customers needing extra support and those needing financial support. This document focuses on non-financial vulnerability, but we have an extensive range of financial support available to customers who need extra help including our discount tariffs, payment plans, payment breaks and hardship fund. For further information on how we plan to continue to support financially vulnerable customers please refer to our [Customer bill profile and affordability](#) and [Bill impact, affordability and vulnerability](#) which documents our Affordability Strategy.

We aim to provide an inclusive service which can be accessed by everyone regardless of their personal characteristics, situations, capabilities, or access needs. A key tool to allow us to be proactive in providing customers with extra help is our Priority Services Register, but an inclusive service is broader than delivering Priority Services – for example by building our website to AA accessibility standards¹, and ensuring our written content is aimed at a reading age of 12 so that everyone can access information. This approach has enabled us achieve certification in the ISO² Standard for Inclusive Service.

London and Thames Valley are a challenging operating environment for a utility retailer, notably due to the large contrasts we observe in levels of customer expectations across different geographic areas. Like others in the water industry, we need to invest in infrastructure to meet the needs of the environment and the communities we serve against a background of economic uncertainty, soaring inflation and an intensifying cost of living crisis.

¹ Guidelines to ensure web content is accessibility

² International Organization for Standardisation

We recognise that our customers have needs that require us to tailor our service so that it's inclusive across all interactions, and in particular, support during incidents. Since 2020 our Priority Service Register (PSR) has grown from 82k to over 606k households at March 2025, through a combination of data sharing, using data proactively, our employees spotting customers needing extra support while serving customers, marketing campaigns and working with partners.

Our plans extend the reach of our priority services from 17% to 36%³ of our eligible population with 1.2 million households, so that customers can benefit from tailored services and proactive support during incidents.

Our approach to extending the reach and awareness of our services focusses on data sharing and community campaigns to efficiently reach both large numbers of customers and those who are underrepresented. It is important that we ensure our propositions reach those that are not aware of the support that would help them due to barriers such as language and culture. Our colleagues will continue to spot vulnerability during customer interactions, and we will undertake marketing awareness campaigns and work with partners to create increased awareness of our support, up from the current 80%⁴ that are aware of at least one proposition.

We will undertake a 30% increase in the number of tailored propositions. We will continue our partnership approach, working with organisations in the 3rd sector to inform our propositions, extend the reach of our services and continue to retain accreditation with the ISO standard for inclusive service.

This document sets out our ambition for vulnerability from our Vision 2050 strategy in section 4 and then our understanding of customers in our region and their extra help needs in section 5. Section 6 describes our approach to meeting customer needs, providing an inclusive service and then section 7 outlines how we plan to extend the reach of our extra help so more customers receive the help they need. Section 8 summaries how this strategy will be delivered and the performance measures we will use to understand whether our strategy is on track. The Annex sets out our alignment with each of the minimum expectations described in Ofwat's 'Service for all' vulnerability guidance.

In this document we consider:

- Short term: FY25/26 – FY26/27
- Medium term: FY27/28- FY29/30
- Long term: Beyond 2030

We believe the introduction of the customer focused licence condition and the PSR Standard⁵ is a positive step forward for both customers and the water industry, and we appreciate Ofwat's efforts to raise the standard of extra care support across the industry. We are aligned with PSR Standard and the licence condition and we are committed to maintaining our compliance with the licence condition and vulnerability guidance.

³ Thames Water data March 2023

⁴ Thames Water Brand Survey 2024/25

⁵ PSR Standard available on the [Ofwat website](#)

Figure 1: Vulnerability Strategy Summary

Purpose	Provide an inclusive service and extra support to those who need it, helping our customers live independent lives in their own homes and reduce the risk of harm as we deliver our services.		
Customer metric	PSR customer satisfaction is greater or equal than non PSR customers	Culture metric	80% of employees are proud of our service delivery for those needing extra help
Operational metric	[36]% of eligible customers (1.2 million households) are registered on our PSR by 2030	Operational metric	80% aware of at least one service proposition for either affordability or inclusive service
Where we focus		How we serve	
<ul style="list-style-type: none">• Provide vulnerable customers with tailored customer service and support• Increase the number and breadth of customers we can proactively support through our PSR• Maintain accurate records of customers who need extra help• Maintain our inclusive service accreditation• Increase the number of tailored propositions• Align with best practice, including Ofwat vulnerability guidance		<ul style="list-style-type: none">• Use data and partner insight to deploy our Customer Reps to engage those who are underrepresented• Deliver targeted awareness campaigns and effective communication to ensure customers are aware of the services we provide• Use internal and external sources of data to monitor the effectiveness of our strategy and continuously improve• Continue to build partnerships that support in understanding customer needs and help us to provide inclusive service• Invest in our systems to enable improved customer communications and journeys• Continuous improvement to grow our propositions through product teams and suppliers and acting on customer insight and best practice	
Objectives			
Hold accurate data: Attempt to contact 90% PSR customers within 2 years and 45% actual contact		Consistent delivery: Maintain inclusive service accreditation	
Compliant: 100% of Ofwat vulnerability guidance minimum expectations		Continuous improvement: Increase number of tailored propositions by 30%	
Reach: Improve representation of support - tbc		Incident support: Incident management CSAT / Incident service delivery - tbc	

2. Updates since draft strategy publication

We were pleased to receive positive feedback from Ofwat and CCW regarding our draft vulnerability strategy, but we are not complacent and want to continue to improve our inclusive service. We have engaged external stakeholders such as CCW, Ofwat and our Customer Challenge Group to develop our final Vulnerability Strategy. We have not made any fundamental changes to our vulnerability strategy since the draft submission.

We have made updates to reflect progress against short term goals, as summarised in Table 1, and other developments such as the context of our wider customer strategy. We have also acted on feedback create a more digestible version of our vulnerability strategy for stakeholders and used feedback from CCW to improve this document.

Table 1: Delivery of our short-term plans

We said we would	We have
Redress - We will make it easy for customers who are not satisfied with the provision of extra help received– for example, during incidents – to contact us and seek redress. We anticipate this may be an interim arrangement whilst we await the findings of any changes to GSS (Guaranteed Standards of Service) review that may result in legislative changes that that scheme.	We have updated our Customer Guarantee Scheme, ahead of the forthcoming changes to GSS (Guaranteed Service Standard) (See section 2.1 for further information)
Alternative water provision - We will significantly increase field resources to provide alternative water during a supply	We have increased the number of tankers to 34, 29 of these are always available during an incident. We have also increased the number

<p>interruption. We currently have 20 full time incident responders and 5 dedicated courier vans on 24/7 standby and are in the process of increasing this to 25 courier vans and also procuring an additional 21 large tankers on top of our current 11 tankers. These tankers are able to support service reservoirs or directly feed into the network that negate the need for alternative supplies to be delivered. By April 2025 we will have capacity to support PSR customers that need alternative water during 96% of incidents.</p>	<p>of vans to 25, 5 are dedicated courier vans on 24/7 standby and 20 are allocated to our team of 20 incident responders who can help deliver bottled water during an incident. We have also implemented reporting to monitor deliveries of bottled water to help ensure PSR customers get promised support during an incident.</p> <p>We have made changes to our Operating Model, creating a new Customer Operations Manager role responsible for driving improvements in how we support customers during incidents.</p>
<p>Clear information - We will improve our website and provide tailored information when customers join our PSR to help them understand the services they can expect to receive. (See section 6.2 for further information)</p>	<p>We have updated our website, providing clearer information about what support customers can expect during an incident. We have improved our PSR 'Welcome letters' so when customers register on our PSR they receive a personalised letter confirming their circumstances, the services they are registered for and how we will support them during an incident.</p>
<p>Prioritisation of water services - As we implement our Salesforce Work Management System for our water network teams we will prioritise the resolution of issues for PSR customers during peaks in demand such as during an outbreak of visible leaks during a period of cold weather. We use extended SLAs at this time to manage customer expectations but would not apply these extended SLAs for PSR customers.</p>	<p>We prioritise the resolution of issues for PSR customers during peaks in demand.</p>
<p>Alignment with new guidance - As Priority Services guidance is issued, we will assess whether our services align with the guidance and develop plans to address any gaps identified</p>	<p>We have delivered PSR redress and improved the clarity of information. We have assessed our compliance with the PSR Standard - no gaps were identified.</p>
<p>Accreditation - Maintain our ISO standard accreditation</p>	<p>We maintained our ISO standard accreditation for a 5th year in succession.</p>
<p>Greater signposting – We will signpost customers to telecoms PSR on our website and update our PSR Welcome letter to provide details of our financial support</p>	<p>Our website has been updated to signpost customers to telecoms PSR. Improvements to our PSR welcome letter included adding details of our financial support and signposting to our PSR redress.</p>
<p>Incident communications – During an incident, customers will be able to contact</p>	<p>We have implemented Web chat and WhatsApp services and introduced the</p>

<p>us by using their preferred method of communication, within the digital and telephony services we offer. During 2024/25 we will be exploring how we expand our channels to include a 2-way messaging service via WhatsApp, which will include incident support. We will aim to prioritise PSR customers in all channels – for text based channels this is by recognising key ‘trigger’ words similar to our approach within social media. When customers call us using a number held against their records in our PSR – known as ‘Call Line Identifier’ or CLI – we can prioritise these customers in our IVR. While our customers’ can continue to use our dedicated PSR phone line this requires a customer to remember to use this service, whereas the CLI is proactive.</p> <p>We will continue to improve our communications and move towards greater proactive segmented messaging of PSR customers during incidents, enabling us to understand their bottled water needs, in the moment.</p>	<p>capability for customers to switch from the IVR when calling us, to a digital channel of their choice, adding bots and AI along the way to make journeys simpler and quicker. We are also the first in the UK water industry to launch SMS updates in digital channels so customers can register for updates about incidents via SMS through our digital channels.</p> <p>We have also explored 2-way messaging service via WhatsApp and built this into future improvement plans for delivery by 26/27.</p>
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In addition to the goals outlined above that we set ourselves for 2024/2025, we have:

- Implemented a new process to enable customers who need extra help and require bespoke support to contact us so we can discuss their requirements. Since its launch, 6⁶ customers have contacted us. The majority of these have been to request adjustments in how we communicate with them e.g. in black white or extra-large print
- Piloted posting social media messages about our PSR in the 5 most common foreign languages spoken in our area, Spanish, Gujarati, Turkish, Polish and Bengali. (See section 7.2 for further information)
- Improved the information on website about accessibility on our nature reserves, wetlands, and reservoirs making it easier for everyone to enjoy our open spaces

Below is a summary of the changes we have made since the publication of our draft strategy.

- Assessed and confirmed full alignment with the PSR Standard (See section 2.2 for further information)
- Adopted the PSR Standard estimate of the eligible population (50%). Our goal for growing our PSR to 1.2m household has not changed but we have revised our estimate of proportion of the eligible population this represents from 75% (based on 24% of the population being eligible) to 36%

⁶ Thames Water analysis

- We have updated our plans to add waste only customers to our PSR, which will be added in 29/30
- We have refreshed our Customer Strategy⁷ (See Figure 2) using customer insight from What Customers, Communities and Stakeholders Want⁸ and working in collaboration with 30 internal leaders and stakeholders. We will focus on being an easy water company to deal with and ensuring we support those who need us most
- Updated the performance measures we plan to use to monitor the delivery of our strategy and inclusive service. We have chosen to continue to use AMP7 performance measures to monitor our performance, ensuring we keep customer data up to date and setting ourselves a new target for PSR customer satisfaction (+/- 1% of non PSR customer satisfaction). We are also introducing new performance measures, which we will track for a year before setting stretching but realistic performance targets

Figure 2: Our Customer Strategy



In 2025 we undertook a survey of 70 advice sector stakeholders to gain feedback on our vulnerability strategy. While we only received 9 responses, all felt that our vulnerability strategy focuses on the right areas. While this is not a representative sample, we take confidence from the results.

2.1 Providing redress

Our Customer Guarantee Scheme has been updated to include commitments to credit customers' accounts with £40 if they do not receive PSR and bill literature in their required format

⁷ Thames Water

⁸ Thames Water data 2023

or did not receive promised bottled water delivery during an incident. Customers can submit claims for redress online.

In February, a large water main burst causing disruption to customers in the Crystal Place area. Following the incident, we wrote to customers to explain what happened and apologise for the inconvenience. We also proactively identified PSR customers who did not receive bottled water deliveries and provided them with £40 bill credits. We aim to improve our bottled water delivery monitoring so to consistently identify customers who have not received promised bottled water and make credits proactively.

Table 2: Customer Guarantee Scheme extra help commitments

PSR service	Payment	Method
Provide PSR and bill literature in required format	£40 credit to account	Claim online
Provide promised bottled water delivery during an incident	£40 credit to account	Claim online

2.2 PSR Standard alignment

We have reviewed the PSR Standard, assessed our strategy and confirm that we meet this guidance without additional actions required. Table 3 below describes how we meet the PSR standard requirements.

Table 3: How we meet the PSR Standard

PSR standard	Our service
Maintain a PSR register, enabling customers to access services set out in the PSR standard	We have an established PSR.
Refer to PSR or Priority Service Register in communications	We use PSR and Priority Service Register in our internal and external communications. PSR is also embedded into our staff training and customer service systems.
PSR criteria: <ul style="list-style-type: none"> • Pensionable age • Disabled • Illness that effects day to day life • Pregnant or live with children aged 5 and under • Have mental health problem • Hearing or sight condition • Poor sense of taste or smell • Difficulty communicating in English • Cognitive impairment, learning disability, developmental condition or dementia 	<p>All our systems used to serve customers include industry aligned ‘need codes’ There are 34 needs codes which enable us to understand customer circumstances and provide them with the support they require.</p> <p>Customers can ask to join the PSR register when they reach pensionable age. However, we feel that there are limited services available for a 65-year-old who may not feel they need extra help. We know that the propensity to need priority services increases with age therefore we</p>

<ul style="list-style-type: none"> • Additional showering or bathing due to health condition • Physical impairment • Disruptive life event such as bereavement 	<p>automatically add customers to our PSR when they reach 80 years old where we hold their date of birth. Over 80-year-olds also benefit from our regular ‘check in’ communications which increases the likelihood of them signing up for additional services.</p>
<p>Service propositions</p> <ul style="list-style-type: none"> • Delivery of alternative water supplies during an interruption • Knock and wait facilities • Additional communications, contact, or support around outages or incidents; • Additional metering support or services by the company; • Alternative communication formats such as braille, audio information, large print, etc; • Arrangement of additional presence during visits; • Third party support (where a nominated trusted contact is allowed to manage a customer’s account on their behalf); • Password facilities (where staff use a password when dealing with a customer); • Signposting to other support and services, both within and outside the company; and • Priority contact before or during actual or potential outages to understand impact and / or ask if further support needed. 	<p>We provide the services set out in the standard.</p> <p>We have 23 inclusive service propositions (See Table 8 for details)</p> <p>PSR customers in tiers 1, 2 and 3 are eligible for bottled water deliveries. We provide water to Tier 4 customers at our bottled water stations (See section 6.1 for further information)</p>
<p>Grow PSR (estimate 50% of household may be eligible for PSR services)</p>	<p>Our goal is to grow our PSR to 1,165,000 households by 2030. This is a 92% increase on the number of customers on our PSR at the end of 2024/2025.</p>
<p>Keep information up to date</p> <ul style="list-style-type: none"> • achieve actual contact with 35% of households on the PSR every two years; and • attempt contact with 90% of households on the PSR every two years 	<p>Through our automated check in process, we attempt to contact 90% of households on our PSR every two years and achieve actual contact with 45% of households on the PSR every two years.</p>
<p>Add new PSR customers to systems as soon as possible and confirm this through welcome letter or email. Confirming support customer can expect and provide information in required format e.g. large print</p>	<p>When customers register on our PSR they receive a personalised PSR “welcome letter” confirming their circumstances, the services they are registered for and how we will support them during an incident.</p>


3. Service For All - Vulnerability Guidance

We reviewed the Ofwat's 'Service For All - Vulnerability Guidance'⁹ and confirm we meet the requirements. We have set out how our approach demonstrates compliance with the guidance in the Appendix 1. We reviewed our plans in response to the guidance being published and adjusted our strategy accordingly.

Following the CCW Vulnerability Workshop in February 2024 we also carried out a gap analysis of our PSR services and those of other companies to identify any areas we can improve and assessed the feasibility of closing any gaps. The output from this analysis was built into our draft strategy and we have since delivered our short term plans (See Table 1) For example, we have made it easy for customers to seek redress if they are not satisfied with the provision of extra help they received.

4. Our ambition

Informed through our customer and stakeholder engagement, we have developed our 2050 Vision and defined the customer outcomes we will achieve. These are described further in our Long Term Delivery Strategy¹⁰. This includes our ambitions for customers, specifically that customers feel we offer value for money and receive affordable, accessible bills. Our vision for 2050 is driven by customer research documented in our Customer Engagement document¹¹.

Our Vision 2050	
 For customers	Providing outstanding service and value for all our customers; motivating them to save water and prevent blockages; making sure everyone always has access to top quality drinking water and an effective waste system

Our vision also includes a focus on how we will provide an inclusive, affordable service with built-in support for customers needing extra help.

We will:

- Increasingly share data with organisations so we can be more proactive in identifying customers needing extra help. This will enable us to engage them to understand what they want and how we best support them, from initial registration to ongoing changes in their situation. We can make our services easy and accessible for those needing extra help and support our customers needing extra help with repairs for leaks, wastage and advice to reduce inefficient use of water
- Increasingly make helpful referrals to agencies that can provide practical support. We recognise we have a role to play in influencing stakeholders to enable legislative change that can allow us to go further

⁹ Ofwat Service for all guidance. [Available here](#)

¹⁰ Our long term delivery strategy [Available here](#)

¹¹ Our customer engagement document. [Available here](#)

- Develop partnerships with local authorities, emergency services and other utilities to refer customers needing extra help and share their data; however, this will likely require legislative changes to place duties on all parties to cooperate

4.1 Our progress towards our ambition - what we have delivered for customers needing extra help

We made a set of commitments for our 2020-2025 business plan to improve our vulnerability offering. Table 4 summarises our projected performance at the end of 2025.

Table 4: Progress and forecast against our vulnerability Performance Commitments

Performance Commitment	Target	End 24/25 ¹²	Commentary
Common PSR: • Extend reach of PSR	7%	10.4%	Mix of data sharing, partner referral and signposting, spotting and embedding into channels delivering growth and hit target of 7% 18 months early ¹³
• Attempt contact with PSR customers > 2yrs	90%	94%	Enabled by automation, with system dates driving emails and letters where no customer contact through business as usual.
• Actual contact with PSR customers > 2yrs	35%	52%	Response rates to letters and emails, along with prompts in our customer relationship management systems have kept this on track.
BS ISO 22458 for inclusive service standard	Maintain	Maintain	To retain this standard, we are focusing on improving consistency in spotting signs of vulnerability and tailoring our response.
Customer Satisfaction (CSAT) for PSR customers	91% satisfied	84%	Dissatisfaction not driven by inclusive service issues. General customer experience plans will improve CSAT for PSR customers.

We have made good progress in growing our PSR and have achieved our end of 2025 target 18 months early. Our investment in aligning systems with PSR data allows our customer facing employees to utilise this information when serving customers and update customer records. These updates, along with automated campaigns to request updates from customers, have allowed us to ensure 52% of customers on the PSR for greater than 2 years have had their records updated in the last two years¹⁴. We have also achieved the ISO Standard for Inclusive service.

However, our Performance Commitment to improve the customer satisfaction CSAT score of PSR customers to 91% did not meet the target. Over the last three years our PSR customers CSAT score has been between -0.2 and +2%¹⁵ than the general customer base showing that

¹² Thames Water Analysis and Thames Water Service Survey 2024/25

¹³ Thames Water analysis

¹⁴ Thames Water Analysis

¹⁵ Thames Water Service Survey 2020-2025

dissatisfaction is not driven by inclusive service issues but service in general and therefore will be driven by our general customer satisfaction plans over time.

4.2 Steps towards our 2050 Vision

By 2050, we will have continued to build our PSR reaching a point where the number of customers on our PSR is close to the number of customers eligible for these services (See Table 5), which will change over time with our demographics. At some point our PSR will reach a steady state, which may or may not be aligned to Ofwat's analysis of 50% of our customer base being eligible.

Our inclusive service will be increasingly proactive as our PSR grows to be representative of the communities that we serve, enabled by data sharing with organisations such as utilities, local authorities, the cabinet office, DWP and the NHS. We will maintain quality standards through external certification and monitoring this segment of customers within our service survey and other customer service metrics to ensure these customers do not suffer detriment due to their circumstances.

Table 5: Long term view of extra help measures

Outcome	2025-2030	2030-2035	2035-2040	2040-2045	2045-2050
PSR reach of eligible population ¹⁶	36%	54%	70%	80%	90%
Enablers	<ul style="list-style-type: none">Incident response maturityData sharing building maturity and efficiencyMaster data management strategyWaste only PSR		<ul style="list-style-type: none">Data sharing maturity across different sectorsData driven levels of consistency in service provisionContinuous improvement in line with technology enablers		

5. Our customers – understanding their inclusive service needs

5.1 Definition of vulnerability

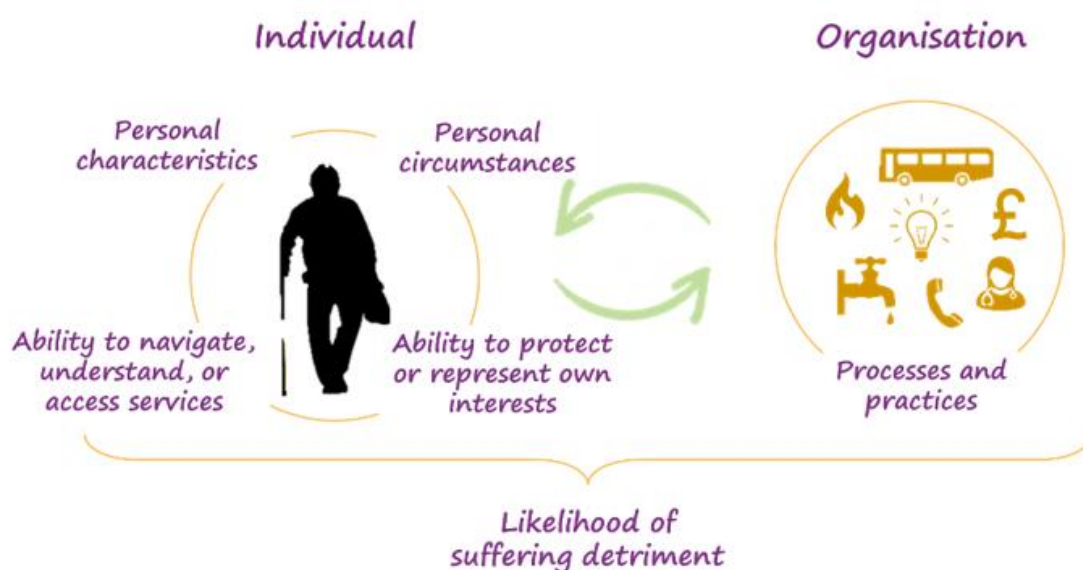
Our definition of vulnerability is – the need for extra help - occurs when a customer may not have reasonable opportunity to access and receive an inclusive, safe service from Thames Water, resulting in a permanent or temporary detrimental impact on their well-being, finances, health or any combination. This is aligned to Ofwat's definition of vulnerability.

With this definition we recognise the dynamic, transient, and diverse nature of circumstances that can make someone at risk of detriment. We understand how our standard actions, while fit for purpose with most customers, can be inappropriate for those needing extra help due to their personal characteristics, circumstances, ability to access services and represent their interests,

¹⁶ Eligible population is 50% of our households served, based on PSR Standard

which can create a risk of detriment. Figure 3 and Table 6 illustrate some of these scenarios and ways of working that we have in place to mitigate harm and provide extra care provision.

Figure 3: How a customer's circumstances and practices of an organisation can create a risk of detriment



Source: [Vulnerability Research for Thames Water by Community Research](#)

Table 6: Examples of customer extra help scenarios when interacting with a water company

Service	Actions that could cause detriment	Company actions to mitigate harm
Accessing services	<ul style="list-style-type: none"> Unable to access digital information and missing out on support services Unable to receive standard communication channels and formats due to a sensory, language or mental capacity deprivation 	<ul style="list-style-type: none"> Provision of inclusive channels for communication and information Channel preferencing
Supply interruptions	<ul style="list-style-type: none"> Customers with mobility issues who are unable to go and get alternative supplies, or have a medical dependency on water 	<ul style="list-style-type: none"> Prompt provision of information and alternative water or other support
Home visits	<ul style="list-style-type: none"> Unable to facilitate our people's entry to a home either due to physical or mental capacity, or concerns about scams 	<ul style="list-style-type: none"> Planning visits to allow chaperones to support Provision of a doorstep password

Underpinning our ability to mitigate risks for customers is the proactive identification of extra help needs and ensuring customers are aware of all relevant services that are available. This is particularly important in the case of transient vulnerability states where customers may be going through a temporary or short term period of vulnerability, such as going through a divorce or the loss of a loved one and not be aware of the support available. We do this by:

- Optimising points of customer engagement to spot risks of detriment and take the opportunity to register or signpost support for relevant services

- Leveraging the data we have, or can access from partners or open sources, to proactively register, refer or signpost customers for support
- Delivering campaigns to increase awareness, in particular communities that are underrepresented to allow services to be extended to them

5.2 What our customers, communities and stakeholders want on extra help

As we have developed our plans, we have ensured customers' needs for an inclusive service and extra help are reflected in our proposals. This has been achieved by using an approach employed when developing previous strategies and is now part of our ongoing ways of working. Figure 4 describes our approach to gathering insight.

Figure 4: Sources of insight



Understanding our customers' expectations with regards to extra care is essential for us to assess the effectiveness of our support package for customers who need extra help. We have therefore conducted an engagement programme with our customer base. Insight from customers and stakeholders across our engagement programme is consolidated periodically as part of ongoing iterations of What Customers, Communities and Stakeholders Want¹⁷. This provides a consistent and robust evidence base for our decision making, and ensures our plans and strategies align with our customers' needs and expectations.

Our engagement with customers needing extra help and their representatives, has highlighted how important it is that our customer experience is inclusive and accessible to all. We need to tailor our services to suit and adapt to the specific needs and circumstances of our customers needing extra help to support them most effectively.

¹⁷ Thames Water analysis

We understand the complex nature of vulnerability, that there are multiple, often inter-connected drivers and that it can take many forms. For example, we have heard how cultural attitudes, religion, language barriers, long-term physical and mental health conditions and a range of other factors can all impact not only the way in which households are able to pay for our services, but also how they are able to interact with us as customers, and how they use and depend on the services we provide¹⁸. Some forms of vulnerability can also be transient, such as an injury or illness, or bereavement. Customers rightly expect us to design services and propositions that help those who could otherwise be disadvantaged due to one or more of the many factors which might affect them.

Finally, it was clear that general awareness of the extra help available to customers is low¹⁹. In addition, there is little expectation amongst some customer groups, particularly amongst first- and second-generation immigrants, that companies of the scale of Thames Water would provide support of any kind to customers. Customers needing extra help and their representatives told us to prioritise raising awareness and actively promoting the benefits of the Priority Services Register and other forms of support which are already available over changing or adding the services we provide²⁰.

5.3 What vulnerability looks like in our region

We regularly monitor and review external insight as it is published and cross reference it with our internal data to build a picture of vulnerability in our area.

Our region has a wide range of customer circumstances. Over the last two decades London has had the highest poverty rate in the UK with 25%²¹ of households in poverty. In contrast, the South-East and South-West parts of our region have poverty rates below the average for England at 20%, while still having pockets of deprivation such as in Swindon and Reading. Areas with income deprivation are more likely to have a range of health conditions including serious mental illness, obesity, diabetes and learning difficulties. Our research identified that 63%²² of our customers are defined as vulnerable. Overall, these customers are most likely to be middle and working class and not working/retired and overlap between groups is relatively small.

¹⁸ Thames Water analysis

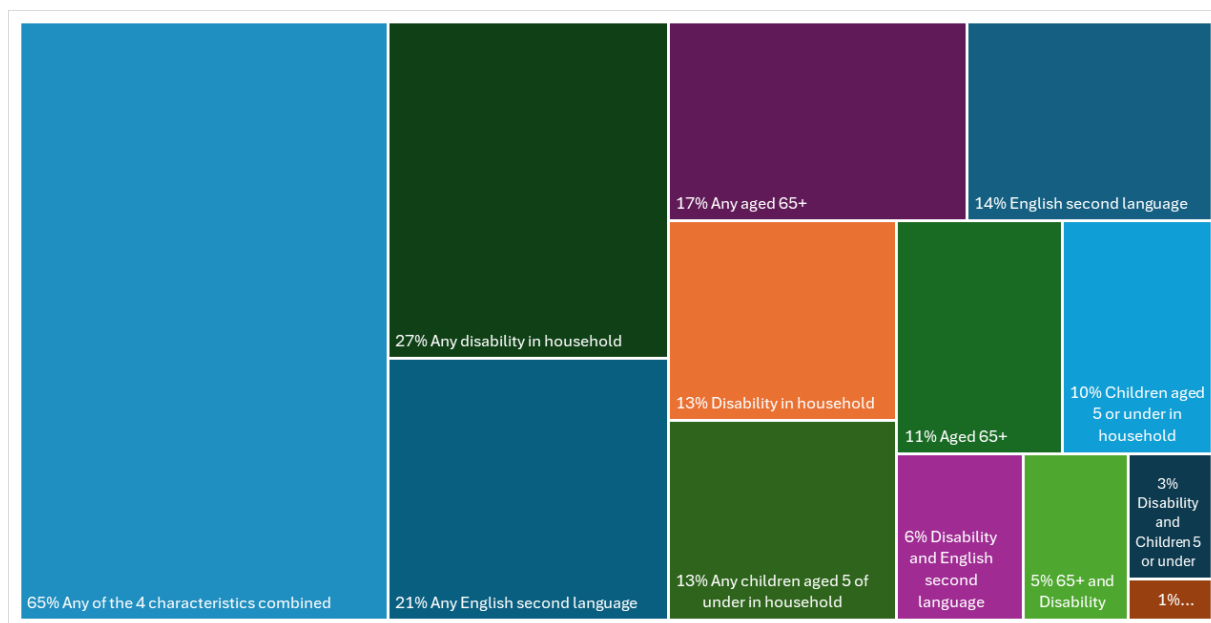
¹⁹ Thames Water analysis

²⁰ Thames Water analysis

²¹ JR Foundation, 2023, UK Poverty 2023: The essential guide to understanding poverty in the UK. [Available here.](#)

²² Thames Water Brand Survey 2024/25

Figure 5: Vulnerability in our area

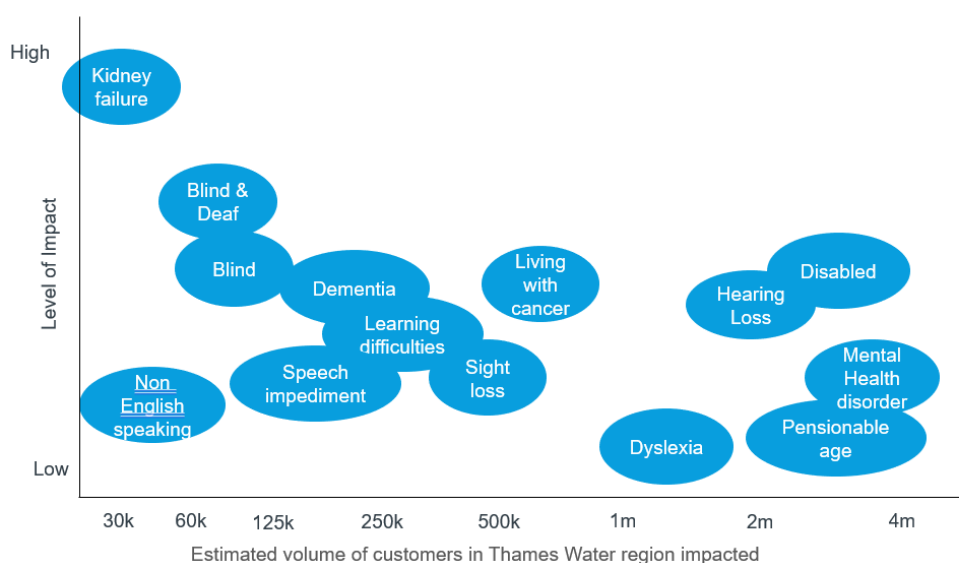


Source: Thames Water research²³

'Disabled' = TW dual customers who consider themselves or anyone in their household to be 'officially disabled' defined by the Equality Act 2010 as 'A physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out day-to-day activities'

Figure 6 summaries the estimated number of people eligible for registration on our PSR for different types of needs based on charity data. Note that these customer populations are not cumulative as it is likely that customers have more than one circumstance.

Figure 6: Volume of customers in vulnerable circumstances against a subjective view of Priority Service impact

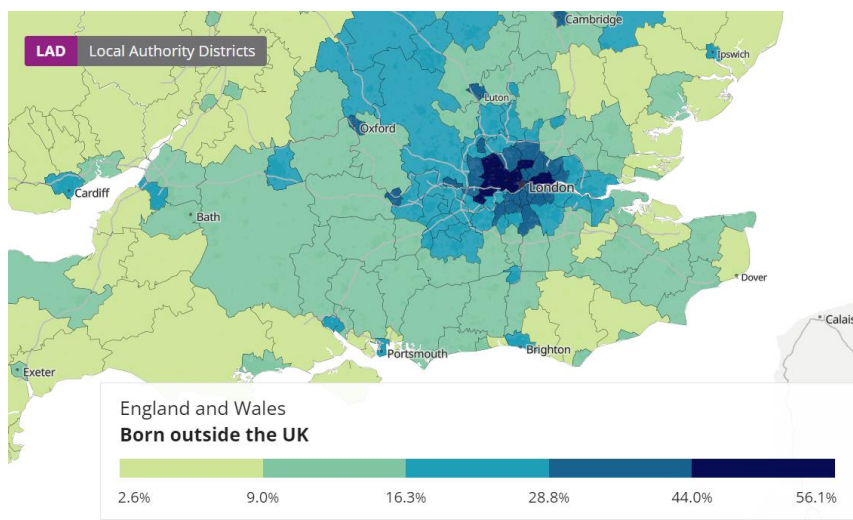


²³ Thames Water Brand Survey 2024/25

Source: [Thames Water analysis](#)²⁴

London is the most ethnically diverse part of the UK, with 46%²⁵ of households identifying with Asian, black, mixed or 'other' ethnic groups. The number of Londoners identifying as 'white British' is less than half that of every other region in the UK at 37%.

Figure 7: Ethnic diversity in our area



Source: [Census data 2021](#)

Another unique factor of our customer base is our notably higher levels of transience - customers moving in and out, or within, or region. Thames Water's total migration rate is 18% vs 12% UK average²⁶. With nearly half of all properties in London being rented, transience presents us with a unique set of challenges. We need to work harder than the rest of the industry to raise awareness of our PSR and maintain accurate PSR data.

Understanding our unique customer base has been key in developing our Vulnerability Strategy and tailoring our services in response to insight, whether that's offering our communications in more languages, or providing bills in different font sizes.

We will continue to review sources of insight and data as it becomes available and cross reference this to our internal data so that we can identify any significant changes and update our strategy in response.

5.4 Understanding our underrepresented customers

To help us develop our plans we commissioned the company Community Research to conduct a 'deep dive' into the lives of customers who are living in vulnerable circumstances, with seventy-five in-depth one-hour interviews taking place, and six interviews with advice and support organisations during Autumn 2023.

²⁴ Thames Water analysis

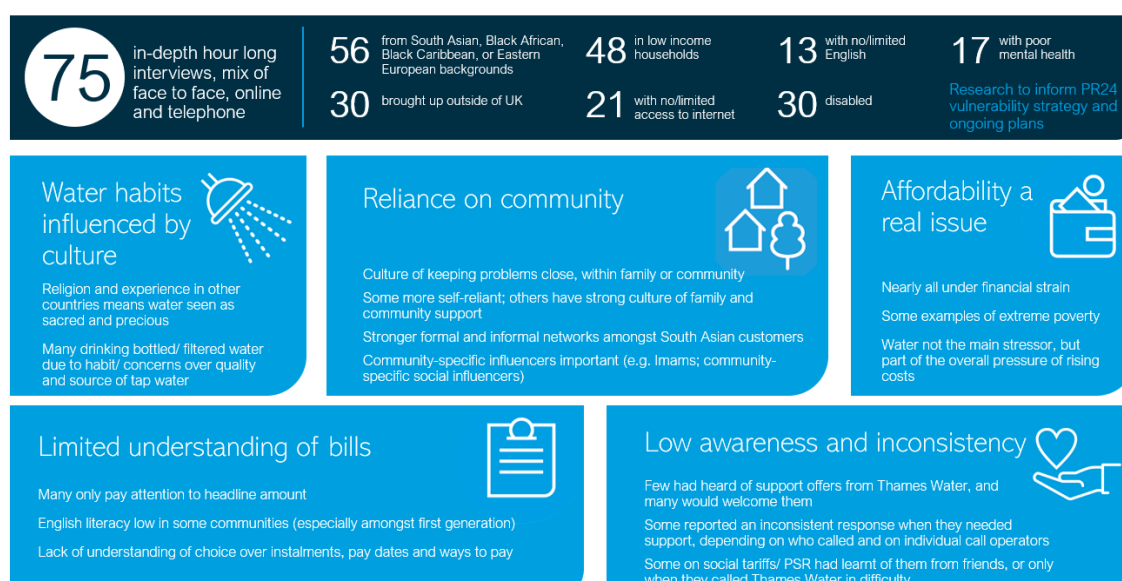
²⁵ Census 2021 data [Available here](#)

²⁶ Thames Water analysis

Census data was used to identify target segments. The customer research focused primarily on customers from minority ethnic backgrounds (fifty-six participants came from South Asian, Black African, Black Caribbean, or Eastern European backgrounds) as we wanted to ensure representation from the breadth of communities that we served. Other vulnerability 'risk factors' were overlaid onto ethnicity, including low-incomes, long-term debt and unemployment, caring responsibilities, disabilities, poor mental health, digital exclusion, and limited/no English language skills. The headlines are summarised in Figure 8.

Figure 8: Insight Headlines from our interviews with underrepresented community members

Vulnerability among customers under-represented in research



Source: [Community Research for Thames Water](#)

We learnt that:

- **Water habits influenced by culture.** A range of factors affected people's use of and views towards water, including: experiences of living in other countries (particularly where clean water was hard to come by); religious beliefs (particularly the sacred nature of water and its role in religious rituals); health conditions driving a higher reliance on water and washing; desire to reduce water usage (both cost and environmental); and perceptions of water quality and safety. Many participants avoided drinking water straight from the tap. Instead, they chose to pay for bottled water; or filter or boil their water before drinking it.
- **Reliance on community.** There were notable differences between ethnic communities in how they approached problems and asked for support. In the Black African, South Asian and Eastern European communities, there was a preference for keeping problems close and seeking support within the family and the community. Some established communities (especially Bangladeshi and Pakistani communities) had stronger informal and formal support structures.

However, in some households (notably those run by 'provider matriarch' figures in Black African families), there was shame about taking problems outside of the immediate family,

and there were fewer established formal support networks. In all minority ethnic communities, there was some resistance to going outside of the community or family for help, and this included approaching utility companies.

- **Low awareness of – and inconsistency in – support.** Almost all participants were familiar with Thames Water, but many had only very limited contact. There was no recall of any communications about the extra help propositions from Thames Water. Of those who had been in touch with Thames Water, many had found them really supportive and helpful (especially during the pandemic).

However, others reported an inconsistent response from Thames Water when they needed support, such as an inconsistent response between call handlers; and problems accessing support or receiving the priority services they had been promised. Some of those with stronger accents and limited English said that they felt they were less likely to be offered help than family members with British accents and fluent English. Only one participant – and no support organisations – knew about Thames Water’s interpretation service Language Line.

5.5 The scale of the challenge ahead

Our literature review, primary research and operational experiences allows us to understand our customers diverse needs on a day-to-day basis. Table 7 below describes some of the characteristics of those needing extra help in our region and the challenges that this creates for us to overcome.

Table 7: Characteristics of those needing extra help in the Thames Water region

Dimension	Challenge
46% ²⁷ of adults display at least one driver of vulnerability, which in our region equates to around 5m adults in our region.	There is a broad range of characteristics of vulnerability affecting a large number of people in complex ways.
Customers who are eligible for our PSR represent 24% ²⁸ of our base, equivalent to 1.5m households.	Solutions need to be delivered at scale, with proactive identification and minimal effort for customer and company which requires investment in digital solutions.
Global warming will increase temperatures by 1.1-2.3°C in the 2030s ²⁹ , increasing risks of heat related deaths and illness (particularly those with heart and respiratory conditions)	Increased customer risk during supply outages in summer heat waves, during a period when demand will increase.
We are living longer lives, but not necessarily with higher quality, with the population of over 85-year-olds set to double by 2040 to 4% of the population ³⁰ .	Increased requirement for Priority Service provision to support independent living through inclusive service.

²⁷ Over 78% of UK are adults. Data from FCA Financial Lives Survey. [Available here](#). Average occupancy of UK 2.36. Data from Statista. [Available here](#). Our 5.8m households are 21% of 27.8m in UK.

²⁸ Pro-rata. 58% of our population served is in London (with estimated 22.5% vulnerable population) and 42% in South East (26% vulnerable population) averages to 24%. Data from Vulnerability in Britain. [Available here](#)

²⁹ Data from the MET office. [Available here](#)

³⁰ Data from the ONS [Available here](#)

While digital exclusion is reducing, and in London and the Southeast it's the lowest in the UK (7% and 8% respectively compared to 10% ³¹ on average) there are still around half a million households in our region that don't have access to the internet.	There is a risk of digitally excluded customers not easily accessing information and support on services available.
There is at least 11 ³² types of essential service provider, either private or statutory, who all are trying to identify and tailor services to customers in need of extra help.	Maintaining accurate data for PSR customers will require collaboration and cooperation across utilities and statutory bodies which all move at different speeds.

5.6 How we think extra help needs will evolve and key challenges for Thames Water

Bringing this insight together we have identified two key challenges our strategy needs to respond to.

1. The demand for an inclusive service will increase

Several factors will increase the demand for inclusive services, driven through our Priority Services.

Affordability issues will also have an impact on health, with half of UK adults already reporting an impact on their health due to the cost of living crisis³³ either through stress, or the health impact of compromising on spending on food and heating. We are also living longer lives, but not necessarily with higher quality, with the population of over 85-year-olds set to double by 2040 to 4% of the population³⁴, and from our insight customers over the age of 80 have a higher propensity to benefit from priority services.

With technology evolving we see more language translation opportunities to engage customers, but it's not clear if by 2030 that capabilities will be accurate enough to do away with the need for a trained translator. Digital exclusion will continue to reduce, with 95% of Londoners having access to the internet in 2020 but as new channels are delivered through AI, we need to be mindful that not every consumer will be able to negotiate them.

This will require us to keep listening to customers and stakeholders and evolve our service offering and keep growing our PSR to ensure a proactive approach to inclusive service. We will need to ensure a consistent level of service to ensure fair and consistent outcomes.

2. The large numbers of customers requiring support requires increased levels of sophistication in data management

Our research shows that 500,000 customers will be eligible for PSR support who are billed by our Water Only Companies. To address the needs of the majority of these customers will require good awareness of propositions, effortless engagement channels and data management approaches that can work efficiently at scale.

³¹ Data from the ONS [Available here](#)

³² Thames Water analysis

³³ British Medical Journal. [Available here](#)

³⁴ ONS data. [Available here](#)

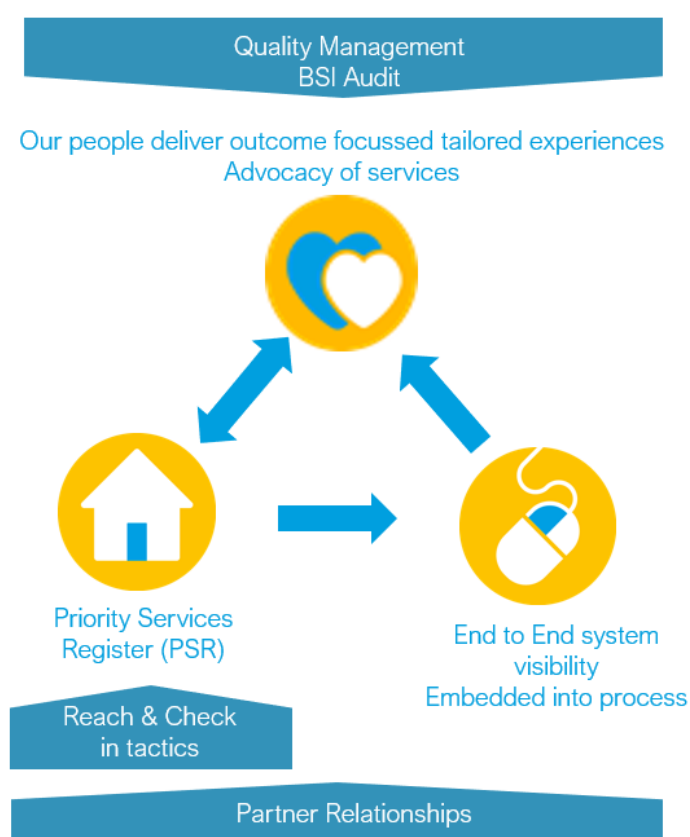
6. Inclusive service - supporting customers who need extra help

6.1 Our approach

We have built the infrastructure to provide a proactive inclusive service through the formation of policies, processes and systems as described in Figure 9. We verified these outcomes with the British Standards Institute for the provision of inclusive service and have been accredited with British Standard 18477 for three successive years and recently upgraded our accreditation to the ISO standard, making a total of five years. Key to this is our training programme, where our customer facing teams undergo vulnerability spotting training and all our employees receive yearly vulnerability e-learning refreshers.

Our PSR data is connected to all the systems used by our customer facing teams to enable tailoring of interactions and processes. Our systems automatically generate emails or letters to customers to prompt them to check in with us to ensure their details are up to date. This ensures we exceed the target of 90% for attempted contacts and along with other channels has seen us also exceed the actual contact target of 35%, with 52% of customers on the PSR for greater than two years engaging with us.

Figure 9: Our approach to providing inclusive service



Source: Thames Water

Raising awareness and extending the reach of our PSR is key to enabling this proactive service delivery. Our approach to data sharing, employee spotting, using data for proactive registration and campaigns to raise awareness has seen our PSR grow by 20,000 households per month, net

14,000,³⁵ during 2024/25³⁶ This has led to us exceeding our target of 410k customers on our PSR, equivalent to 7% of our base, 18 months early. Our approach to increasing awareness and reach of our services is described in more detail in section 7.

PSR data informs conversations on the phone and on the doorstep, facilitates inclusive communication formats and tailored processes. Table 8 provides a summary of the propositions we deliver.

When monitoring customer satisfaction scores for customers on our PSR we see a slight improvement, typically around 1%³⁷, compared to non PSR customers. When we explore drivers of dissatisfaction for PSR customers they are largely the same as non PSR customers, for example keeping customers informed and resolving issues quickly. The one inclusive service theme that emerges as a source of dissatisfaction is the provision of alternative water during supply interruptions, which is currently being invested in. As our customer service improvement plans described in our Customer Strategy improve customer experience, we may see more inclusive service issues being surfaced that we will address.

Driven by our customer and stakeholder engagement we have been growing the breadth of our propositions to support customers, doubling the number from 11 at the start of 2020 to 23³⁸, as shown in Table 6.

Table 8: Our inclusive service propositions (those introduced since 2020 highlighted in bold)

Theme	Current propositions (new within 2020-2025 in bold) accessed via PSR	Current propositions (new within 2020-2025 in bold) without accessing via PSR
Inclusive Communication channels	<ul style="list-style-type: none"> • Language translation (voice) • Nominated representative / Alternative contact engagement • Accessible website to AA standard • Text Relay • Face to Face BSL translation • Video relay for incoming BSL calls • Webchat • Video call facility • Use of PSR data to tailor behaviours 	<ul style="list-style-type: none"> • Braille communications • Large print communications • Bills on coloured backgrounds (plus other revenue communications) • Talking bills • Tailored behaviours by training staff eg talking slowly, repeating information • Clear and simple communications e.g. use of Plain Numbers approach to communicate numerical information
Tailored Engagement	<ul style="list-style-type: none"> • Trained people aware of needs to tailoring conversations and service • Doorstep password • Regular check in on circumstances • Systemised PSR registration with UK Power Network (UKPN) 	<ul style="list-style-type: none"> • Specialist bereavement team • Hardship fund referrals • Signposting to supporting partners

³⁵ Thames Water analysis

³⁶ Thames Water data

³⁷ Thames Water Service Survey 2020-2025

³⁸ Thames Water analysis

	<ul style="list-style-type: none"> • Proactive registration for over 80-year-olds • Customers can choose to have someone they trust present when we visit 	
Operational Services	<ul style="list-style-type: none"> • Proactive contact during a water outage • Proactive delivery of alternative water • Support from Customer Reps during an incident • Flooding – prioritised response • Prioritised response during peak demand • Priority phone line, front of the queue bypassing IVR • Advance notice of planned supply interruptions • Complaints – prioritised response 	<ul style="list-style-type: none"> • Staff identity checks • Meter relocation • Help reading a meter • Water quality checks • Knock and wait

6.2 Providing clear information about our service

We understand that it is important to clearly communicate with customers what they can expect when they are registered for Priority Services. It is particularly important that customers understand what support they can expect during an incident.

The provision of bottled water during a supply interruption is prioritised by impact on a household, based on a customer's circumstances held on the PSR. Those most in need, such as PSR customers who are mobility impaired, medically dependant on water, blind, aged over 90, suffering from a short-term illness or injury lasting more than two weeks are given the highest priority and therefore can expect bottled water to be delivered to them. Customers over the age of 80, who are partially sighted and have children under 5 are next priority. Customers on the PSR for communication support are not eligible for bottled water deliveries but can collect water from bottled water stations.

Table 9: PSR tiers

Tier	Theme	Typical circumstances	Water delivery?
1	Medically dependant	Water dependant, Dialysis	Yes
2	Severe lack of mobility	Serious illness, physical impairment, Dementia Blind, post hospital recovery, over 90 years old	
3	Lack of mobility	Over 80 years old, children under 5, partially sighted	
4	Communication needs	Non-English speaker, mental health, speech impairment, hearing impairment	No

We are able to support tiers 1, 2 and 3 for 96% of incidents based on historical frequencies of supply interruption by numbers of properties impacted. For 4% of incidents we will need to prioritise our support and broadcast this in a way that allows customers to respond accordingly.

We aim to ensure customers understand the services they will receive (See Table 10). We have made improvements to our PSR welcome letter so that it is tailored to each customer and provides details of the services they can expect to receive. Our future plans aim to provide customers with personal updates on whether we are able to supply with bottled water during an incident. To do this during incidents we anticipate the need to implement a new customer communications platform. Whilst we build towards this, we will investigate the potential for personalised communications with our existing systems. We are also creating four new Incident Communication Specialist roles to increase the frequency and quality of content of broadcast messages during incidents.

Table 10: Our current approach to communicating our service and planned improvements

Customer interaction	Current	2025-2030
Pre registration	Information on our website regarding services provided and how we prioritise bottled water provision during an incident	Continuously improve website to ensure information is clear and accessible
Registration & Check in	Customers tell us about their circumstances and select services they would find useful. At check in customers can see which services they have registered for on our customer portal.	Continuously improve our processes as we grow the number of services available.
Confirmation of registration	Personalised letters to confirm services selected and set expectations on alternative water delivery based on customer circumstances.	Continuous improvement
During an incident	Provide information to all customers about the incident via SMS and our website and social media	Provide PSR customers with proactive updates on deliveries of bottled water

6.3 Progress made in inclusive service provision since 2020

Since 2020 we have made significant investment in our inclusive services.

All our systems used to serve customers now include industry aligned 'need codes' and our data master ensures up to date information for all customer interactions. This provides a consistent view of the PSR that supports our interactions with customers

Our PSR registration journey is now simpler for both our people and our customers. Our contact centre teams can register customers on the PSR without any referral to a specialist team and update records directly into the customer relationship management system. Customers can

register on our portal which then is automatically loaded into our systems. This portal also supports customers updating their records as well as the negligible volume of customer driven removal requests. We provide customers with a welcome letter which explains the services available to them and details of our privacy notice, where they can find out about how we use their data. Customers can also find details of our services e.g. how we prioritise the provision of bottle water supplies during an incident on our website.

We led the industry direction away from explicit consent as a method of capturing PSR data as we recognised that collecting and storing PSR data using explicit consent was creating barriers for engaging customers and was not the most appropriate legal basis. After we changed to Legitimate Interest / Substantial Public Interest the ICO (Information Commissioners Office) subsequently endorsed this change and now all water companies and DNOs (Distribution Network Operators) are using this legal basis, with energy suppliers expected to follow shortly. A powerful benefit of this change is the reduced effort to capture details, allowing third parties, such as carers, and support organisations, such as fire brigades, to register customers more simply.

This change of legal basis has helped us develop data sharing between statutory bodies and energy companies with the creation of the Essential Sharing Network. This approach enabled Thames Water and UKPN to be the first Energy – Water partnership that systemised the two-way exchange of customer PSR details underpinned by a legal basis rather than explicit consent. We have also been the first water company to introduce systemised data sharing with statutory bodies. Firstly, with the London Fire Brigade and now also the Wiltshire Fire Brigade, with more details in the case study below (See Figure 10).

Figure 10: Case Study: Fire Brigade data sharing



Every month around 1000 customers are added to our PSR through data shared with us from the London Fire Brigade (LFB) after they have undertaken home visits targeted at those who are at greater risk of a fire at home. One third of these customers are already on our PSR which helps keep our customer records up to date.

Customer research with LFB demonstrated that 97% of their customers were happy to be added to our PSR in this way. Our two-way sharing has allowed Dorset, Swindon & Wiltshire Fire Brigade to target and deliver Home Safe and Well visits, with around 28 customers every month benefiting from fire safety devices being fitted in their homes.

We planned to have data sharing in place with a local authority during 2020-2025. However, despite engaging with over 20 local authorities, we were unable to overcome barriers of resource constraints and incorrect perceptions of the legal basis. We have now put this activity on hold as

we focus on supporting industry efforts to create consistent ways of working that are scalable to work with the Energy sector.

Working with third parties, outlined in Table 16, we have improved our knowledge on inclusivity and implemented a new training programme which has been rolled out to all our customer facing colleagues, with E-learning for those in non-customer facing roles. A yearly refresher is also in place and coaching of spotting and tailoring to ensure inclusivity is driven by our quality management framework.

Table 11: Third party collaboration to improve staff training and knowledge

Third party	Collaboration details
Mind	Contributed to our help article for Mental Health for front line team in our knowledge centre (MyGuide)
Samaritans	Extra Care team have received training from Samaritans
Berkshire Vision	Helped us create a short video with one of their service users and promote on social channels but also help us ensure we are using the right language when speaking to our customers
Kidney Care UK	Contributed to our help article for Kidney Disease for front line team in our knowledge centre (MyGuide)
Age UK	We have worked with Age UK Berkshire to ensure their phone support service are trained to signpost or register their service users to the PSR once and they have leaflets in their centres.
Money Advice Trust	Our training programme ensures all our people understand what circumstances can create situations of vulnerability, what services we can offer to support and to give them confidence to offer these services. This training was developed with the Money Advice Trust and comprises of an eLearning module for all our people and a facilitator led interactive half day session for our customer facing teams. The eLearning is a part of our annual mandatory training requirement and is refreshed yearly and a complete rebuild undertaken after three years to keep the content relevant and engaging.
Dementia UK	We have trained each other's front-line advisors on our reciprocal services and Thames Water has amplified Dementia UK's above the line advertising campaign through their own social channels to raise awareness of the charities work and reframe our own support services – over the course of the partnership customers registering with a dementia needs code increased by 44% over 2021 to 2023

These changes, and the other activities set out in section 7, have grown our PSR 1% to 10.4%³⁹ of households served. Gross growth of 20k per month⁴⁰ is achieved through data sharing, our employee's spotting, signposting and referrals from partners. Maintaining the quality of our data with our automated check in process will remain a focus, complementing other engagement channels with customers. We see data sharing taking an increasingly important role in supporting the quality of our PSR data.

A key part of providing an inclusive service is providing information in a simple and accessible way. We have rebuilt our website, so it is now on Web Content Accessibility Guidelines (WCAG)

³⁹ Thames Water analysis

⁴⁰ Thames Water data

to AA standard – a level that many organisations strive to meet⁴¹. This allows screen readers, translators, and other adaptive technology to be applied by users. With a focus on improving our communications and made them more accessible, we retrained our teams that respond to written complaints and queries with the support of a specialist organisation, ‘the First Word’. As a result, quality scores improved and second stage complaints with a root cause of ‘unclear response’ reduced from 30% to 1%⁴².

A further example of the progress we have made is our bill redesign project. We used an ‘inclusive by design’ process to support our customers to better understand our bills, by making them clear and helpful. This was based on extensive customer and call centre insight, looking across the industry for best practice. Yonder, an external research agency, was then commissioned to conduct in-depth interviews with a diverse set of 28 customers to get their feedback on our new design. As a result, we experienced a 10% drop in calls relating to ‘understand my bill’ from customers receiving the new bill design. In our customer survey 94% found new bill easy to understand, 77% thought it was better than our previous bill and 67% thought it was better than other utility bills. We initiated a partnership with Plain Numbers as part of this bill redesign project which we have continued. See case study in Figure 11.

Figure 11: Our partnership with Plain Numbers:

Plain Numbers Case Study

Poor numeracy is the most prevalent form of vulnerability. In 2021 we were an inaugural partner with [Plain Numbers](#), who enable organisations to improve understanding and facilitate informed choices with numbers by using their best practice approach of small practical changes. We tested this as part of our redesign of our customer bills. They helped us think through how to present numbers and design research which were part of the success of our bill redesign.

Our Customer Comms team are now accredited ‘Plain Numbers practitioners’ and they are bringing the principles of using numbers in an accessible way across all their content that will reach customers. As we produce new communication materials a triage process is in place to identify documents with a high risk of numerical misinterpretation and these documents are shared with Plain Numbers for a review and an iterative process that leads to the material being accredited. As part of reviewing our communications to align with the Ofwat ‘Paying Fair Guidelines’ we successfully submitted two of our debt recovery templates for Plain Numbers accreditation. We selected two critical documents – the final demand for payment and letters used when we write to the executors of a customer that has died. These letters represent the first Plain Numbers accredited communications in the water industry.

To progress our commitments to inclusivity, we have increased the number of support propositions from 11 to 23 as shown in Table 8. When we update propositions, we work with partners to ensure our advice to our teams is up to date. For example, we updated our knowledge management content for supporting customers with kidney failure with Kidney Care UK, how to engage with customers with hearing loss with Action on Hearing Loss (now RNID) and insight on

⁴¹ Web Accessibility Initiative (WAI) Web Content Accessibility Guidelines. [Available here](#)

⁴² Thames Water analysis

how to support those living with Dementia with Dementia UK. This ensures that the information given to our customer facing employees represents current thinking and provides succinct and accessible guidance whilst working with our customers daily.

Our wastewater network teams use PSR data when prioritising blockage clearances and follow on repair work so that PSR customers service levels are protected, and the standard 24 hours is maintained during peaks in demand. For non PSR customers, during peaks in demand, typically due to high levels of rainfall in the winter and over a shorter period during summer storms we need to extend customer promises. At these times blockage clearance service levels can increase from 24 hours to 48 hours. This is an improvement from our previous service levels of 48 hours to 72 hours, or in extreme situations 5 days.

When prioritising follow-on work for our waste network, we have developed our Customer Risk Index model which incorporates PSR data among other indicators of customer and asset impact when prioritising repairs. As a result, there is typically less than 3%⁴³ of outstanding work related to PSR customers, despite 10% of households being on our PSR.

We have restructured how our PSR data is used during incidents, such as supply interruptions, with priority tiers utilised to focus our support where it is most needed. This, along with the increase in reach of our PSR, provides greater visibility of those customers which require support. However, we have not always been able to proactively deliver water to all customers within the timescales that are acceptable. To improve our delivery process, the number of tankers has increased from 11 to 29 and we are in the process of investing in a more resilient supply chain to improve our incident response. This includes a significant increase in field resources to provide alternative water during a supply interruption with 20 Thames Water full time Incident Responders and 5 dedicated courier vans on 24/7 standby.

Collectively these investments have allowed us to meet BSI 18477 for inclusive services for the last five years and upgrade from the current British Standard to the ISO standard and Kitemark in the fourth year, which has an updated and broader scope than the British Standard. We will continue to assure our service provision through annual accreditation.

Customer satisfaction for customers on the PSR is not currently meeting our target of 91% while PSR customers record satisfaction scores of 83.8% compared to non PSR customers at 83.6%⁴⁴. Our customer service improvement plan will drive increased satisfaction, as dissatisfaction is driven by general customer service issues, not inclusive service issues. The one inclusive service theme that emerges as a source of dissatisfaction is the provision of alternative water during supply interruptions which we are addressing, as described earlier in this section, but resolving this alone does not close the gap on the target.

6.4 Our plans for inclusive service FY25/26-FY26/27

Having made substantial investment within inclusive service since 2020 we have reviewed our approach through benchmarking and stakeholder engagement and plan to continue with our current approach. Our short-term plans focus on the following areas:

⁴³ Thames Water data

⁴⁴ Thames Water Service Survey 2024-25

- Increase breadth of services we offer with a 30% increase in the number of service propositions for those who need extra support by 2030
- Continue our automated check in process for PSR customers every 2 years with a targeted 45% actual contact
- We will engage with industry wide initiatives to start data sharing with energy suppliers, in addition to the current sharing with DNOs
- Implement data analysis to identify underrepresented communities and partnering with third party organisations to reach customers who are not aware of support available to help them
- We aim to continue to improve our support for customers impacted by incidents. We will maintain our fleet of 29 tankers that are able to support service reservoirs or directly feed into the network to negate the need for alternative supplies to be delivered. We will also maintain our team of team of 20 incident responders and vans and 5 dedicated courier vans on 24/7 standby. Data analysis of historical frequencies of supply interruptions by numbers of customers impacted indicate that this enables us to support tiers 1, 2 and 3 customers in over 94% of incidents. However, recent incidents have shown that we need to review our approach to delivering bottled water to improve resilience and consistency of service. Enhanced monitoring of bottled water deliveries will also help us improve performance. We will also implement aftercare processes to help customers following an incident
- Make further improvements to engagement with customers during incidents. Our aim to prioritise inbound PSR customers in all channels – for text based channels such as WhatsApp, this is by recognising key ‘trigger’ words similar to our approach within social media. For phone contacts - when customers call us using a number held against their records in our PSR we will identify them (known as ‘Call Line Identifier’ or CLI) so we can prioritise these customers in our Interactive Voice Response (IVR), in case the PSR customer has forgotten to use the hotline that we have provided to them and finds themselves in a queue. We are also increasing our capacity to proactively broadcast updates to customers by recruiting 4 new Incident Communication Specialists to provide coverage from 7 days a week 7am to 9pm. We will also implement 2-way messaging service via WhatsApp to allow us to check in on PSR customers at scale during incidents
- Monitor our service survey customer satisfaction scores for our PSR customers and compare to non PSR customers and ensure there are no themes of detriment for these customers, plus identify continuous improvement opportunities
- Maintain external accreditation for our inclusive services
- Create a new dashboard for monitoring our vulnerability strategy outcomes for regular review at the Retail Leadership Team

6.5 Our plans for inclusive service FY27/28- FY29/30

Continuing our current strategy will enable us to:

- Extend the reach of our PSR to 36% of eligible households, with 1.2 million customers supported driven by a combination of mature data sharing and community engagement

to engage those who are underrepresented. One of the enablers for this is creating a database to hold PSR data for waste only customers with data mastered by the water only (billing) companies in our region

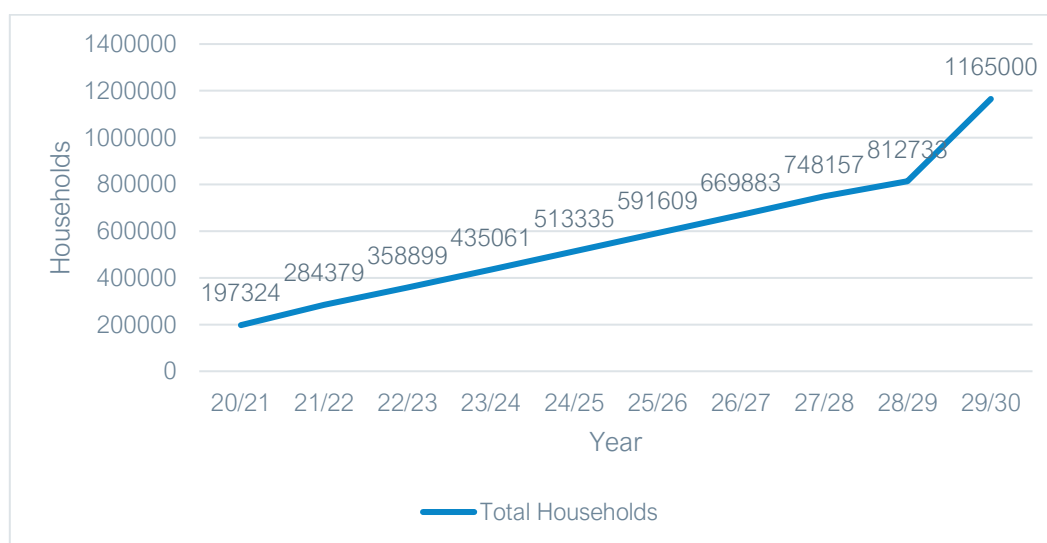
- Increase breadth of services we offer with a 30% increase in the number of service propositions for those who need extra support
- Continue our automated check in process for PSR customers every 2 years with a targeted 45% actual contact
- Monitor our service survey customer satisfaction scores for our PSR customers and compare to non PSR customers and ensure there are no themes of detriment for these customers, plus identify continuous improvement opportunities
- Maintain external accreditation for our inclusive services

We will share best practice as we continuously improve, in line with expectations of the customer licence condition and associated guidance.

Our 2050 vision is to hold a PSR that is reflective of the needs within the communities we serve. However, we know that this will be difficult to achieve without an aligned approach from utilities, wider industry, statutory bodies, and the 3rd sector. Building this momentum will be difficult and to date our work with the National Preparedness Committee has shown that this is not a key focus area for government.

Without a government department with the convening power to bring stakeholders together and set an expectation of sharing data we don't believe we will be able to achieve a fully representative PSR by 2030. Our goal for growing our PSR has not changed but we have revised our estimate of proportion of the eligible population this represents from 75% (based on 24% of the population being eligible) to 36% (Based on Ofwat's eligibility estimate of 50% of the population) This equates to 1,165,000 households a 92% increase on the number of customers on our PSR at the end of 2024/2025 and will require a step change in the maturity of our current approaches to engage customers, which is described in section 7. Figure 12 describes the growth of our PSR.

Figure 12: Projected PSR growth over 2020-2030



Source: Thames Water

A key component of this growth is utilising Water Only Company data within our PSR. Historically 'Special Needs Registers' were focussed on water supply and billing issues. Our PSR is mastered within our billing system and as we don't directly bill our waste only customers, we have no system to support this data. While a standalone, tactical, capability for a waste only PSR could have been built during the 2020-2025 business planning period it would have created inefficiencies in our systems and data architecture.

Instead, the deployment of our Customer and Property Data Transformation to ensure our customer and property data to ensure its up to date, accurate and accessible, will enable this capability. This investment will ensure we hold and utilise Unique Property Reference Numbers across our systems will facilitate data sharing with Water Only Companies who hold PSRs in their billing systems. Our digital capital expenditure has been carefully prioritised to best serve all our customers and the Data Transformation is phased towards the end of 2024/2025, pushing the waste only PSR capability into the 2025-2030 business planning period.

Driving scale in the growth of our PSR will be our approach to data sharing. Data sharing is an efficient scalable solution to identify customers in need of support. While the breadth of a customer's needs is not fully understood from data, engagement after proactive registration or communication campaigns can lead to a deeper understanding of a customer's situation. Driving engagement with those who are underrepresented will come from our community campaigns. While expensive and inefficient at scale, community presence and door to door engagement can reach customers who otherwise wouldn't engage with us or are visible in data sharing.

Our hybrid approach is to utilise our community campaigns after data sharing has been deployed. Community campaigns will be highly targeted and use external data to target communities where our proposition reach has not met expected levels of penetration. We will build on the insight taken from our recent pilot (See section 5.4), our collaboration with Severn Trent's innovation fund research, and industry pilots facilitated by the CCW Affordability Review to refine our community approach.

Maintaining data quality will be increasingly reliant on data sharing with other organisations rather than our outbound emails and letters in our automated 'check in' process. We will continue to attempt contact with 90% of our customers on our PSR greater than two years as aspiring to attempt contact a greater number will lead to excessive management of this metric. This is because PSR customer data has a dynamic nature as customers engage with us or leave our region. Targeting actual contact at 45% is based on current performance and represents a challenging target as the PSR grows to 1,165,000 customers.

We will continue our collaboration with partners as described in section 7 to ensure our service is fit for purpose. This engagement will be at the heart of our plans to increase the number of circumstance specific propositions by 30%. Implementing new service propositions requires innovation, partnering with the 3rd sector, engagement with customers and system investment. The propositions we are targeting have been highlighted by stakeholders and can be built on our strategic platforms. Table 12 summarises the service propositions that we plan to develop between 2025-2030. We have almost trebled the number of services that we deliver for customers and will deliver another seven additional propositions between 2025-2030. This list will evolve as insight identifies opportunities to serve new and emerging vulnerabilities, and as technology provides new solutions.

We will continue to use PSR data within work management tools, with PSR data being incorporated into our case management pilot to speed up complex or high impact waste network activity to mitigate customer impact. Across all our operational reporting PSR status will be utilised to mitigate customer risks. We expect service levels to be the same or better as non PSR households.

Customers experiencing incidents will receive rapid communications and consistent support through the deployment of our new customer communications platform that will allow us to increase the frequency of communications during incidents. Our primary channel currently is SMS and the new platform will enable us to utilise emails and, crucially for PSR customers, enable SMS messages to be sent to landlines – a channel used by the Energy Distribution Network operators. We hold email and/or mobile details for the majority of our customers but 32%⁴⁵ of PSR customers only have landline; implementing this solution will enable us to reach these customers during an incident.

We'll also provide externally recognised accessibility and inclusivity standards of services that support our 2050 Vision. To do this we will maintain our accredited quality approach to the provision of inclusive service and continue to increase consistency with the application of voice analytics focussed on vulnerability outcomes.

As our general customer service levels improve, we will be able to more readily identify inclusive service themes that are driving dissatisfaction to enable continuous improvement. We will focus on our service survey as it has a more representative sample of customers compared to the CMEX survey, where we may only identify around 10,000 customers per year.

Table 12: Development of Inclusive Service Propositions that we plan to roll out between 2025-2030, building on those provided currently, and is subject to change

Theme	2020-2025 Propositions	Proposed additional propositions over 2025-2030
Inclusive Communication channels	<ul style="list-style-type: none"> • Language translation • Braille / large print communications • Coloured backgrounds • Accessible website • Text Relay • Video relay for BSL 	<ul style="list-style-type: none"> • Awareness communications (eg, PSR, bin it/don't block it) and safety (restriction of use) in wider languages • Written summary of conversation • Employees with foreign language routed calls via system based on PSR data
Tailored Engagement	<ul style="list-style-type: none"> • Trained people aware and tailoring conversations and service • Doorstep password • Hardship fund referrals • Regular check in on circumstances • Signposting to supporting partners 	<ul style="list-style-type: none"> • Real time quality management • Prior engagement before impactful works • Specialists to support with sensitive scenarios, eg, mental health / dementia / chronic sickness

⁴⁵ Thames Water analysis

Operational Services	<ul style="list-style-type: none"> • Water outage – proactive contact, support from Reps and alternative water • Flooding – prioritised response • Waste – prioritised response during peak demand • Priority phone line, no IVR • Smart CSL PSR data prioritisation 	<ul style="list-style-type: none"> • Incident management consistent and at scale • Optimised waste response model
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7. Working with external partners and extending the reach and awareness of our services

This section brings together our approach to working with external partners and extending the reach of our services for those needing extra help. The approach to external engagement and extending the reach of our services is similar and we expect our customers to benefit from both types of support

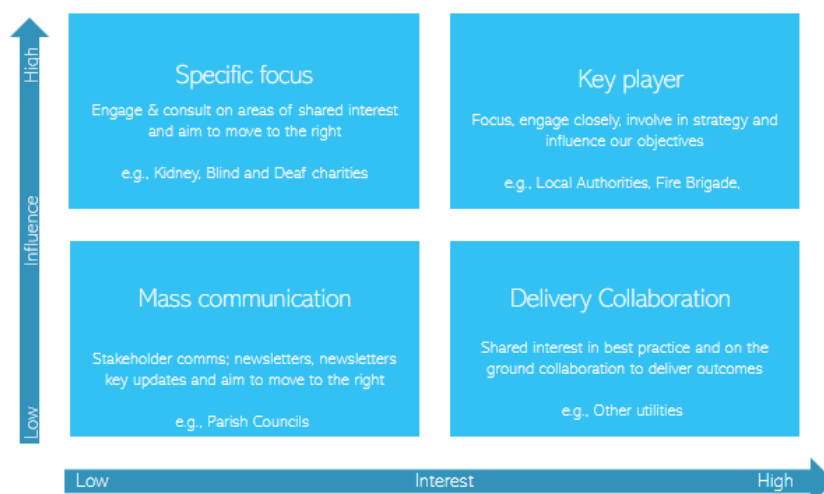
External organisations play an integral role in our vulnerability strategy. Organisations that specialise in providing services for specific segments of our customers are well placed to act as critical friends and help us create a broad and inclusive service. There are three areas that we focus on:

- Improve the quality of our service by providing insight as to the needs of consumers that organisations represent and highlight gaps in service provision
- Prioritise areas of focus - by sharing our plans and inviting challenge we can ensure we are delivering changes that make the most impact
- Collaborate to extend the reach of our services through signposting, referrals, or data sharing

7.1 Working with external partners to improve service

We have over 200 organisations that we make aware of our support through mass communication channels such as newsletters and webinars. Our approach to working with stakeholders is described in Figure 13.

Figure 13: Our approach to engaging with stakeholders



Source: Thames Water

We deep dive into specific focus areas to ensure our services for a particular area are adequate. For example, through engagement with Action on Hearing Loss, now RNID, and with Sense we identified the opportunity to create a British Sign Language channel for our customers which now supports over 3000⁴⁶ phone calls a year. We are also working in partnership to deliver collaborative engagement with customers in our region, in particular our overlapping Energy Distribution Network Operators. We have undertaken shared PSR awareness campaigns and visits to interest groups such as Age UK and faith groups. There is an active sharing of best practice between utilities and wider sectors who are all working towards similar outcomes.

During the period 2019 – 2023 we were developing, designing and implementing our vulnerability and affordability strategies. During this period a vital stakeholder group was our 'Vulnerability Network', which was a group of 30 critical friends, from organisations that advocate for customers in specific circumstances, as shown in Figure 14. The group met on annual basis for four years where we would share our plans and identify opportunities for 'break out groups' to explore specific issues and solutions, ensuring an inclusive design approach. For example, the development of our social tariff, WaterHelp, and alignment of eligibility criteria with the Southeast water companies was heavily supported by Money Advice Trust, Turn 2 Us, Christians Against Poverty and StepChange.

However, now that we have a mature capability that is subject to continuous improvement to optimise our service rather than requiring transformation, we have taken the decision not to continue with a formal Vulnerability Network panel. There will be less change for us to engage with the 3rd sector and we are mindful of the impact we are having on the 3rd sector's time. We will still maintain our engagement with these organisations, but only when the need arises. We will also commit time to attending seminars, working groups and reading research to ensure we maintain an understanding of customer's needs in our ever-changing world.

⁴⁶ Thames Water analysis

Figure 14: Stakeholders were involved in our Vulnerability Network



7.2 Extending the reach and awareness of our propositions, including those who are underrepresented

While progress has been made, with customer awareness of at least one support proposition has remained at 80% between 2020 and 2025. We recognise that awareness of our support is not high enough. 49% of our customers are aware of at least one element of our PSR through our regular survey⁴⁷, and in the latest CCW Water Matters survey an awareness level of 49%⁴⁸. Typically, those with the greatest need have the lowest awareness.

While we have made great progress, we know we need to do more to extend the reach of our PSR. In 2024 we piloted posting messages about our PSR in the five most common foreign languages spoken in our area, Spanish, Gujarati, Turkish, Polish and Bengali (See Figure 15), however the trial did not generate material engagement. We will keep maturing our capabilities with a number of data sharing partners, remain consistent in employee spotting, work with partners to promote signposting or specific campaigns, and continue our baseline of marketing campaigns.

⁴⁷ Thames Water Brand Survey 2024/25.

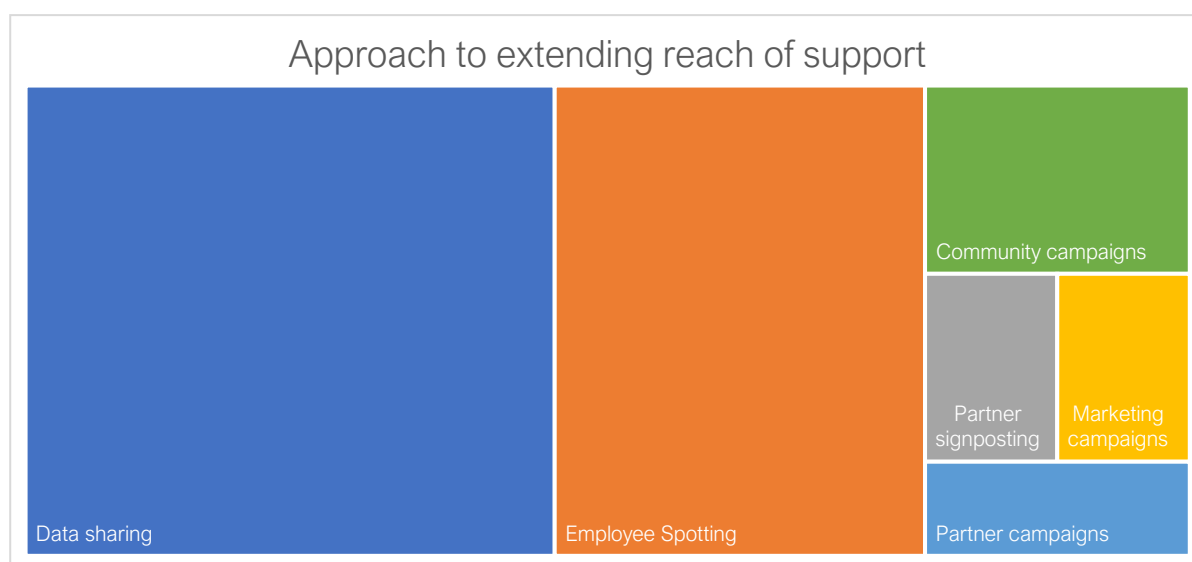
⁴⁸ CCW Water Matters 2025 report. [Available here](#)

Figure 15: PSR awareness foreign language trial



The different approaches we use to extend proposition reach and their contribution by volume are outlined in Figure 16, with each segment proportionate to the volume of customers engaged through the channel.

Figure 16: Presentation of how relative volume by channel will contribute towards increasing the reach of propositions



We know that where we will make a step change is in our data sharing and in our community campaigns. While community campaigns are an inefficient way to extend proposition reach, they will engage those who are underrepresented.

7.3 Data and data sharing

Data sharing progress

We led the industry direction away from explicit consent as a method of capturing PSR data and pioneered data sharing between statutory bodies and energy companies with the creation of the Essential Sharing Network. This approach enabled Thames Water and UKPN to be the first Energy

– Water partnership that systemised the two-way exchange of customer PSR details underpinned by a legal basis other than explicit consent.

We have also been the first water company to introduce systemised data sharing with statutory bodies. Firstly, with the London Fire Brigade and then Dorset and Wiltshire Fire Brigade. In the case of Dorset and Wiltshire this sharing is two-way, with the fire service receiving referrals from Thames Water that allows them to target home safe and well visits. Dorset and Wiltshire Fire Brigade have received over 1,200⁴⁹ referrals from Thames Water which have resulted in 378⁵⁰ fire prevention visits being undertaken through our data sharing over the year from April 2024 to March 2025. London Fire Brigade want to receive our data but due to capacity issues are unable to do this currently.

As a result, over 337,000⁵¹ PSR records have been exchanged between Thames Water and external organisations during 24/25 and we expect this to only grow with time.

We have been engaging with over 20 local authorities and we plan to have data sharing in place with a local authority during 2020-2025. However, we were not able to overcome Local Authority barriers of resource constraints and incorrect perceptions of the legal basis. We have now put this activity on hold while we focus on supporting industry efforts to create consistent ways of working that are scalable to work with the Energy sector.

We gained expertise from this experience and are playing a lead role in the industry core group facilitated by Water UK and the Energy Networks Association that is setting direction on how to create a consistent approach across Water and Energy. We also contributed to the Northumbrian Water 'Support for All' initiative during the initial pilot, which is testing the potential for a single PSR database with funding from Ofwat's innovation fund. This development is crucial to allow Energy Suppliers to join the arrangements and increase the volume of data shared. We are ensuring we have enablers in place to undertake data sharing at scale efficiently.

Additionally, we have used our own data to proactively engage customers. For example, we use date of birth captured during our billing processes to drive PSR registrations. After a literature review and engaging with our vulnerability network, in particular Age UK, we decided that 80 years old is the right threshold for automatic registration. While the industry agreed needs code is 'Pensionable Age' we feel that there are limited services available for a 65-year-old who may not feel they need extra help. However, we know that the propensity to need priority services increases with age and therefore over 80-year-olds benefit from our regular 'check in' communications which will increase the likelihood of them signing up for additional services. Also, customers over the age of 80 will benefit from proactive water delivery during an incident. As a result, around 1,500 customers per month over the age of 80 now join our PSR and receive a welcome letter recommending they register for any relevant services.

Data sharing - Increased scale

As we continue to grow our PSR we see data sharing playing a key role in delivering the commitments of supporting 1.2 million households and keeping our records up to date. We will continue to influence industry ways of working to enable a network of data sharing across all essential service providers and incorporate councils, local authorities, statutory bodies. We

⁴⁹ Thames Water data

⁵⁰ Thames Water data

⁵¹ Thames Water data

anticipate this being built by influencing the current Water – Energy data sharing to evolve to use a common system that can be configured to also facilitate other sectors to join.

We sponsored the National Preparedness Commission to research this issue, resulting in the publication of [The Data-sharing Imperative: Lessons from the Pandemic](#) and a workshop with stakeholders across regulators, government, industry and the 3rd sector.

From our PSR data sharing work we know it is difficult to forecast the volumes of customers that will benefit from this approach, and it will take some time to align stakeholders and lobby Government to support, but we see this as an essential part of our approach. In May 2024 Government published a white paper, [The Data-sharing Imperative: Lessons from the Pandemic - National Preparedness Commission](#), on their desire to create a single PSR which, along with industry peers, we see as endorsement of our work in this area to breakdown barriers.

7.4 Community campaigns

Community Campaigns Pilots

From testing ways of working with partners, for example Sense and Age UK, we understand that we need to be highly targeted when working with a community to ensure customers identify with the messages that we are using. We developed a prototype data dashboard that uses expected demand for water affordability support at a community level data modelling by BRG which was then overlaid our data on propensity for benefiting from Priority Services.

Our team of 14 Customer Reps, spread across our region, support with complex customer issues that can't be resolved on the phone. This includes reacting to incidents, complex water

and waste service issues that require case management and resolving billing issues. The customers who need the most support are often those living with vulnerable circumstances and the Reps are our specialists in the field, with a greater level of training and experience.

When they are not resolving issues reactively the Reps are proactively engaging customers that need extra support by attending local community meetings and building networks with carers and advice providers. On average the team of Reps deliver 4 community engagements a month and create 1,000 PSR registrations a year from underrepresented groups in our communities. Rob is one of our team and appears in Figure 17.

Figure 17: *Engaging communities*

Case study: Rob, Customer Rep, engaging communities on our support when he is not resolving customer issues



Our Customer Representatives, like Rob pictured below, attend community events, from Dementia cafes, Parkinson's groups to faith centres, stroke and older people forums, in order to proactively promote our Extra Help Services. A visit to a stroke group meeting meant he could present our full offering, sit with customers and help them understand what it means to them and stay behind to help clear up! Feedback from this and similar events was 'it's good to see Thames Water in person - it really helps!'

An absolute highlight for Rob is being able to tell them about the support available and make applications for them 'I love this part of what I do, it's immensely rewarding. Working in this way shows that Thames Water really do care about the communities we serve.'

Community campaigns - increased scale in 2025-2030

To expand the influence of our community campaigns, we will evolve our prototype data dashboard and use it to deliver a step-by-step approach to working in our region and the communities we serve, as described in Figure 18.

Figure 18: Our community engagement approach



Reviewing our data model will tell us where to target, starting at Local Authority level and then down to Lower Layer Super Output Areas, in order to deploy our community engagement most efficiently for the greatest impact.

Once a target area is selected, we will engage with local partners and then deploy our community toolkit, which will include our people attending community events and targeted door knocking. Our community toolkit has benefited from the insight from the Ofwat Innovation fund led by Severn Trent that we were partners in producing. Working in this way over time will build a reputation based on face-to-face presence and trust.

Our initial modelling has selected Enfield, Croydon, and Newham as the areas we will first target.

Through the success of this approach, we aim to focus on more local authorities and communities in our region over 2025-2030 and extend the reach of our PSR by 54,000⁵².

We have consulted with the Head of Tackling Poverty and Cost of Living Strategy at the DWP to help us accelerate our access into organisations that support people in crisis but at a much deeper community-based level. These kinds of partnerships take time to nurture, but already these connections have given us a much deeper view of who we can collaborate with. Further to this our External Affairs colleagues at Thames Water have worked enable conversations and engagement by writing to MPs, Councillors and the GLA (Greater London Authority) to set up meetings and as a result obtain meetings with key political stakeholders that can help with our vulnerability ambitions.

Table 13: Organisations we have been engaging to develop our community campaigns approach

Organisation	Collaboration Opportunity
Interfaith network Promotes understanding, cooperation and good relations between organisations and persons of different faiths in the UK	Working with this trusted partner will help us reach into different cultures to raise awareness of our support services
Gardens of peace Muslim Cemetery in Greater London	Gain the trust of the communities we serve through their elders and share moments and channels to raise awareness
Faith Forum London Empowers religious communities to work together for a better London	Open a network of religious festivals and connections to raise awareness using data to target our effort into communities and faiths that need us the most.
Near Neighbours Network Brings religiously and ethnically diverse communities together to collaborate on initiatives that improve the community they live in	Communities that are religiously and ethnically diverse, build relationships and trust and collaborate on initiatives that benefit the community
Parent forums Spaces to share experiences and issues relating to parenthood	To be targeted to access not only the obvious need but others like carers of the critically.

⁵² Thames Water data

Councils Cost of living Coordinators	Having joined the GSL convened sessions we can tap into household support fund initiatives via the cost of living coordinators. Our ambition is to signpost and attend events together and support each other's messaging – already started this activity with Merton and will use as best practice to roll out further.
Job centre Partnership Managers	Very knowledgeable and well connected with communities – get their help and support to reach further. The DWP are running a series of workshops that they will invite us to and help us gain traction with this network.
English Football League Trust	There are 72 football clubs in the UK, and 80% of all benefit claimants live within a few miles of a club. Through their Community Club Organisations, we hope to work with their community and participation teams across key areas of our region to fund conversations or raise awareness of our services through this trusted partner
Scottish & Southern Electricity Network (Distribution Network Operator)	Trusted partner in diverse communities with strong links and translated materials
UK Power Networks (Distribution Network Operator)	Utility Affordability Framework – using data to target key shared customers with collaborative initiatives to make the customer journey more meaningful and our contact efficiently delivered.

7.5 Employee spotting – 2020-2025 case studies and 2025-2030 approach

One of our most important initiatives in 2020-2025 was the creation of our training programme to ensure all our people understand what circumstances can create situations of vulnerability, what services we can offer to support and to give them confidence to offer these services. This training was developed with the Money Advice Trust and comprises of an eLearning module for all our people and a facilitator led interactive half day session for our customer facing teams.

The eLearning is a part of our annual mandatory training requirement and is refreshed every year with a complete rebuild undertaken after three years to keep the content relevant and engaging. Within our contact centres spotting signs of vulnerability is built into the quality management framework which leads to ongoing coaching and engagement from line managers. Around 2,000 customers per month join our PSR, or have their details updated, as part of these interactions. In our Operational Contact Centre PSR champions support teams in bringing our Priority Services to life and share best practice in spotting signs of vulnerability – see Figure 19.

Figure 19: PSR champions in our Operational Contact Centre and who conduct huddles to engage front line teams in vulnerability



Internal communications play a valuable part in increasing our employee's understanding of the role they can take in supporting customer's that need extra help. Sharing news internally about the external impact we have made means our employees are more curious of how vulnerability plays a part in their own role. From Water Quality and Meter Readers to Property Searches and Financial Customer Care – so many of our colleagues are getting involved and playing their part in spotting signs of vulnerability or ways they can change their own work practices.

7.6 Partner signposting - 2020-2025 case studies and 2025-2030 approach

Organisations that support customers with their specific circumstances have an important role to play in advocating services that help their clients to continue to live independent lives with confidence. Since 2020 we have engaged with over 200 organisations, such as advice agencies, charities, job centres and local authorities to encourage them signpost their users towards our services. We host a biannual webinar to update those organisations on our extra support services and created a forum to share and discuss cases. These sessions have given us a platform to ensure that the most up to date knowledge is out there helping our customers, but also an opportunity to hear from the agents that support our customers in crisis.

Where possible we ask that our partners signpost to Thames Water within their own engagement channels – this can be newsletters, help pages on their website, waiting rooms and social channels. These are a part of our 'always on' channel within our communications but hard to measure in terms of their success. Where possible we put google analytics on any links that we share but some of this work is very organic and happens without our intervention.

Some examples of working in this way to reach key groups of customers:

- Age UK Berkshire during their phone support service are trained to signpost or register their service users to the PSR once and they have leaflets in their centres.
- Berkshire Vision helped us create a short video with one of their service users and promote on social channels but also help us ensure we are using the right language when speaking to our customers.
- Together with Dementia UK we have trained each other's front-line advisors on our reciprocal services and Thames Water has amplified Dementia UK's above the line advertising campaign through their own social channels to raise awareness of the

charities work and reframe our own support services – over the course of the partnership customers registering with a dementia needs code increased by 44% over 2021 to 2023.

- Scottish & Southern Electricity Networks – using translated promotional materials during joint faith centre visits increases awareness within faith groups for both water and energy services.

Figure 20: Thames Water team members at the Sikh Gurdwara in Slough with our literature translated into Punjabi, alongside SSN



7.7 Marketing campaigns - 2020-2025 case studies and 2025-2030 approach

Broadly three approaches are used to increase awareness of our services through marketing: social campaigns, targeted letter/email communications, and inclusive and accessible content on social media.

With regards to our social media presence, we ensure we have a regular drumbeat of PSR content each month. In addition to this we promote some of these posts with paid ad spend, to enable them to achieve a wider reach, and therefore create an increase in awareness among our customer audience. Each set of creative material for each post focuses on a different eligibility to the PSR, to help connect and relate to our audience, and create the ‘this is applicable to me’ mindset. Each post is the start of the customer online journey, as we give call-to-actions by directing customers to our PSR web pages for further information and/or to sign themselves up to the register. Figure 21 provides some examples of this content shared recently.

In our efforts to be increasingly more inclusive, we conducted a trial whereby we ran some PSR posts that were published in six alternate languages – chosen based on the most common London-based languages; Bengali, Punjabi, Turkish, Spanish, Polish and Gujarati (See Figure 20).

Our content uses inclusive branding, with readable fonts, controlled use of hashtags, and colour tones and contrasts that make the content accessible to all. This together with the volume and

context of our social content, has resulted in our passing the OSI Audit for our ISO standard for inclusive service accreditation each year.

Moving forward, we will create more emotive content and introduce video format back into our content mix, hearing from real customers about their experience of PSR and how it's benefited them and the positive impact it's had.

Figure 21: Examples of social media messaging raising awareness of our services



7.8 Partner campaigns - 2020-2025 case studies and 2025-2030 approach

By undertaking a gap analysis of populations with inclusive service needs in our region against the reach of specific 'needs codes' within our PSR we can identify where we should focus.

For example, we identified the potential to increase the numbers of customers who were blind or partially sighted on our PSR. This community is not geographically focussed and typically would have good engagement with support organisations. We identified five organisations that support this segment of customers and found that Sense was the most engaged and willing to collaborate in a paid for partnership. Sense reviewed our service proposition, accessibility of services, made recommendations for change and then promoted our PSR through their own targeted channels, social media, posters in their high street charity shops and in the press. An example is included in Figure 22. This included two videos featuring Sense clients advocating registering for Priority Services.

Figure 22: Our partnership with Sense



'Smiley news' picked up on this campaign along with other brands but not mainstream media. As a result, the PSR registrations during the three months after the campaign were 900%⁵³ higher than the three months prior, with around 1,000 customers registering per month.

Case Study: Engaging a community through partnership

Our partnership with Sense was driven by their insight on the opportunity to create an inbound BSL channel via video plus increased awareness from their paper, retail store and social media channels. The outcome was Thames Water's highest monthly sentiment score plus a 900% increase in registrations for relevant needs codes, which are a particularly hard to reach segment.

Following a similar process our next campaign under development is with Kidney Care UK.

8. Delivering our strategy

To deliver our stretching vulnerability strategy funding will be made to support those initiatives that have the greatest impact on supporting our customers that need extra help, ensuring our plan is value for money. This will include continued investment in our people data, processes and systems.

Our strategy has been signed off by the Exec member who has accountability for providing inclusive service and our Customer Service Committee, which includes three Board members and meets twice a year, has oversight of our strategy to monitor its effectiveness. Our vulnerability performance scorecard (See Table 14 for performance measures) will also be reviewed quarterly by senior management, which includes four Retail directors. We will also be providing CCW and our Customer Challenge Group with regular update throughout the delivery of our strategy.

⁵³ Thames Water analysis

8.1 Delivery programme

Figure 21 outlines our high-level delivery plan for the inclusive proposals described in section 6.

Our delivery plan which will be coordinated by the Retail team has been categorised into four main workstreams and contains initiatives which will be delivered by teams across the company, demonstrating the commitment to providing inclusive service by everyone at Thames Water.

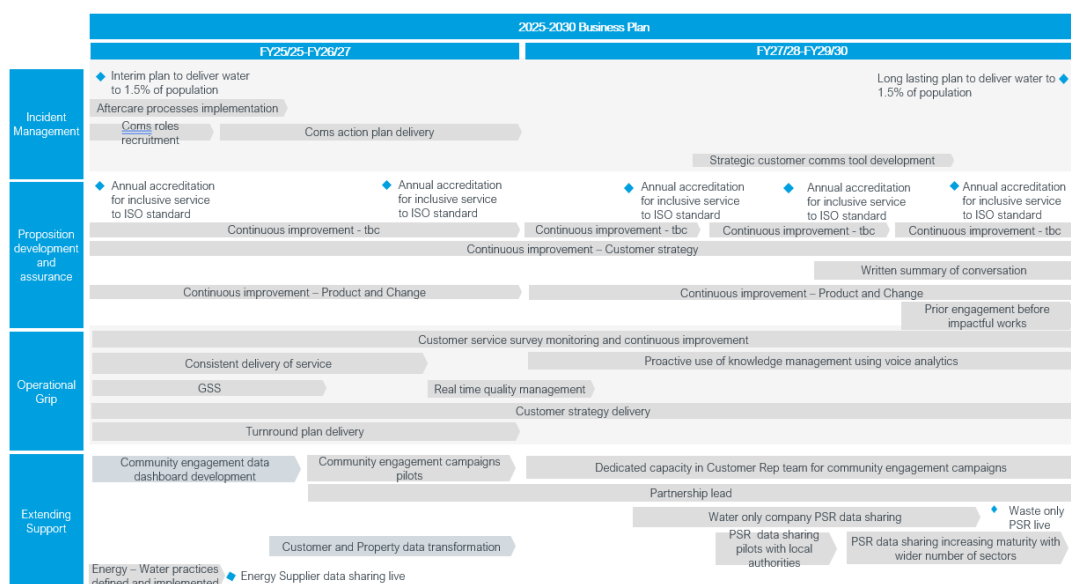
This strategy has dependencies on three strategic platforms delivered through digital capital expenditure – the single customer communications strategy, the digital toolkit for customer engagement to utilise smart meter data within customer communications, plus the customer and property data transformation to ensure our property data is consistent across all systems. The phasing of the digital capital expenditure creates dependencies for this strategy.

In 2025-2030 we will improve our incident customer communications through the implementation of our single customer communications strategy. Proposition enhancements will be refined and rolled out over 2025-2030 to meet the 30% increase planned.

To support the delivery of our strategy, we will continue to take a leading role influencing PSR data sharing and industry direction to create a sharing mechanism that sectors outside of water and energy can join. The customer and property data transformation enablers will ensure efficient matching of customer and property data for PSR data sharing. This system will also enable our waste only PSR in 2025-2030.

We will continue to pilot our community engagement campaign approach with our Customer Representative team through to 2028 and once optimised additional resources will be utilised.

Figure 23: Inclusive service short term and medium term delivery plan⁵⁴



⁵⁴ Thames Water analysis

8.2 How do we know our strategy is successful?

We want to ensure that our strategy is delivering its desired outcomes for customers. Table 14 describes the measures we will use to monitor the effectiveness of our strategy and ensure we are on track to meet our targets. We are introducing new performance measures which will be monitored for a year before setting ourselves challenging but realistic targets. While these metrics will evolve, this table summarises the measures and our aspirations. Our vulnerability performance scorecard will be reviewed quarterly by senior management, which includes four Retail directors.

Table 14: Measures to monitor the success of our strategy

Strategy focus	Rational	Dimension	Target
Consistent delivery	Understand how consistently we are delivering inclusive service so action can be taken if issues are identified	Service survey score: % of PSR customers satisfied relative to % non PSR customers satisfied	+/- 1% Non PSR. The same or higher than non PSR @2030
		How well we responded and supported PSR customers during an incident	tbc
		Bottled water deliveries for Tier 1 & 2 delivered within 24 hours of an incident	tbc
		Extra care Guaranteed Service Scheme claims	tbc
		Quality of service and actioning vulnerability – from call centre quality audits	tbc
Growth and awareness	How effectively we are ensuring our support propositions reach those who need and want our help	Proportion of eligible customers on PSR, based on Ofwat's 50% eligibility estimate	20% to 36% -1.2m HHs @ 2030
		Representation of support: Reduce difference between the proportion of households on the PSR in the top and bottom quartiles by community (community = Lower layer Super Output Areas or LSOAs)	tbc
		Support awareness survey – aware of at least one service proposition for either affordability or inclusive service	80%
Strategic goal	How effectively are we delivering our vulnerability strategy	PSR attempted / actual contact with customers on PSR > 2 years	90% / 45%
		Inclusive service accreditation status	Maintain
		Number of tailored propositions	30 propositions
		Vulnerability Guidance alignment	100%
		Employee pride in service delivery for those needing extra help from Hear for You survey	80%

Appendix 1 - Alignment with Ofwat's 'Service for All' vulnerability guidance

No.	Minimum expectations	Compliance	Implementation	Monitoring	Challenges	Targets
1.1	Companies should adapt their services to customers in line with any known extra help needs. This is especially important during times where there is increased risk of harm; for example, during incidents.	Compliant	<ul style="list-style-type: none"> • We have 23 propositions for supporting customer (See table 8) • We use a Customer Risk Index model which incorporates PSR data among other indicators of customer and asset impact when prioritising wastewater repairs (See section 6.3) • We support our customers needing extra help with repairs for leaks, wastage and advice to reduce inefficient use of water • Our wastewater network teams use PSR data when prioritising blockage clearances (See section 6.3) • We have 14 Customer Reps spread across our region who are specially trained and provide support reacting to incidents, case managing complex water and waste service issues and resolving billing issues (See section 7.4) • When planning work which may interrupt customers water supply, we identify vulnerable customers registered on our PSR and provide them with advance notice • During incidents we provide customers with updates on our website and deliver bottled water to PSR customers who are dependent on water or unable to collect water from bottled water stations 	<ul style="list-style-type: none"> • PSR customer satisfaction. A lower than baseline score will represent inclusive service issues requiring intervention • Number of tailored propositions • Inclusive service accreditation status • Service survey score 	Delivering alternative water to large numbers of customers is difficult	<ul style="list-style-type: none"> • By 2030 PSR customer satisfaction is +/- 1% non PSR customer satisfaction • By 2030 we will increase in tailored propositions by 30% • Maintain our ISO standard accreditation • Incident management CSAT tbc

			<ul style="list-style-type: none"> • We provide PSR customers with a dedicated phone line for operational issues, PSR customers will go to the front of the queue and bypass the IVR. We also prioritise contacts coming in through Sign Video for British Sign Language users. • We have trained our teams responding to written complaints and queries with the support of a specialist organisation, 'the First Word' to ensure our communications are clear and accessible (See section 6.3) • Our bills have been designed using a 'inclusive by design' process to support our customers to better understand our bills, by making them clear and helpful (See section 6.3) • We have worked in partnership with Plain Numbers as part of our bill redesign to simplify the presentation of numerical information (See section 6.3) • We have a dedicated Extra Care Team who provide a specialist service for customers that need extra help for both circumstantial vulnerability and priority services, plus affordability support. • Complaints from PSR customers are managed by senior team members. The urgency of action/response is assessed and if it needs to be prioritised over other cases it will be responded to quicker. A Customer Rep will be considered if they need additional assistance or an in person visit. 			
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			<ul style="list-style-type: none"> • For billing queries, we prioritise customers who have suffered a bereavement with a dedicated team and phone line to handle these queries. • We also signpost customers to financial support and services provided by others e.g. approved plumbers, energy PSR Dementia UK, Macmillan Cancer support, Mind and Kidney Care UK • We have 8 sites such as reservoirs and nature reserves which customers can use for leisure where we provide wheelchair access, disabled toilets and welcome assistance dogs. Information about access to our sites is available on our website. Sailing for people with disabilities is provided at our Farmoor Reservoir. • We prioritise the resolution of water service issues for PSR customers during peaks in demand <p>To improve our service we will:</p> <ul style="list-style-type: none"> • Increase breadth of services we offer with a 30% increase in the number of service propositions for those who need extra support by 2030 (See section 6.4) • Improve our incident communications (See section 6.4) 			
1.2	Companies should ensure that the level and nature of support	Compliant	<ul style="list-style-type: none"> • Our website, so aligned with Web Content Accessibility Guidelines (WCAG) to AA standard. This allows screen readers, translators, and other adaptive technology to be applied by users (See section 6.3) 	<ul style="list-style-type: none"> • PSR customer satisfaction. A lower than baseline score will represent inclusive 	<ul style="list-style-type: none"> • Measuring the provision of inclusive services is 	<ul style="list-style-type: none"> • By 2030 PSR customer satisfaction +/- 1% non PSR

	available to customers is presented in a way customers can understand.		<ul style="list-style-type: none"> • We provide tailored information when customers join our PSR to help them understand the services they can expect to receive (See section 6.2) • Customer can seek redress if they are not satisfied with the provision of extra help they received (See section 2) 	service issues requiring intervention. <ul style="list-style-type: none"> • Inclusive service accreditation status 	complex and often subjective.	customer satisfaction <ul style="list-style-type: none"> • Maintain our ISO standard accreditation
1.3	Companies should seek to continuously improve the service they provide to customers who need extra help. This may include finding innovative ways to design or implement services.	Compliant	<ul style="list-style-type: none"> • We have a track record in improving the services we offer, with an increase from 11 to 23 Inclusive service propositions since 2020 to 2023. • We are always looking for ways to improve our service and raise the bar. We learn from our own experiences and benchmark with other organisations and take learning from within the water sector and outside of it. We also use customer feedback, research and our operational data. • We categorise all our complaints to help us focus on the issues that are impacting customers and focus our efforts in the right area. We identify the root causes of an issue to ensure we make changes that are sustainable. • We have continuous improvement processes in place to ensure learning can be captured from unplanned incidents that either have or had the potential to impact our customers or have a significant impact on the environment. The learning is used to prevent similar unplanned incidents from re-occurring and/or minimise the impact if they reoccur by managing them better. 	<ul style="list-style-type: none"> • PSR customer satisfaction. A lower than baseline score will represent inclusive service issues requiring intervention. • Inclusive service accreditation status • Number of tailored propositions • Service survey score - Incident management 	<ul style="list-style-type: none"> • Prioritisation of digital capex to create a new strategic platform to enhance customer communications during incidents. 	<ul style="list-style-type: none"> • By 2030 PSR customer satisfaction +/- 1% non PSR customer satisfaction • Maintain our ISO standard accreditation • By 2030 we will increase in tailored propositions by 30%

			<ul style="list-style-type: none"> • We enable customers who require bespoke support to contact us so we can discuss their requirements 			
1.4	Companies should use a range of data to monitor the effectiveness of their extra help services, and the satisfaction levels of customers who have made such needs known.	Compliant	<ul style="list-style-type: none"> • We use a variety of insight such as data analytics, benchmarking, customer immersion, expert and partner interviews, and employee focus groups to identify opportunities to improve our services • We use operational performance and customer satisfaction surveys to understand how well we are delivering our services and where to focus on making improvements • See table 14 for detail of how we plan to monitor the effectiveness of our strategy 	<ul style="list-style-type: none"> • PSR customer satisfaction. A lower than baseline score will represent inclusive service issues requiring intervention • Service survey score - Incident management • Employee pride in service delivery for those needing extra help. Our employees will only score this highly if they believe they are meeting the needs of customers 		<ul style="list-style-type: none"> • By 2030 PSR customer satisfaction +/- 1% non PSR customer satisfaction • Incident management CSAT target tbc • By 2030 80% of employees will be proud of the extra help service we provide
2.1	Companies should interact with customers in a way that is inclusive for a diverse range of audiences. This should be underpinned by relevant insights, which may	Compliant	<ul style="list-style-type: none"> • We have been accredited with BSI 18477 and then ISO 22458 for the provision of inclusive service for five successive years (See section 6.3) • We use a wide range of internal and external data sources, customer research and stakeholder views. For example while we were building our capability we formed the we are part of the Vulnerability Network (Figure 14) which is a included annual engagement with 30 organisations that advocate for customers in specific circumstances (See section 7.1). While we will not continue our annual panel, as the pace of change has slowed and we are mindful 	<ul style="list-style-type: none"> • Inclusive service accreditation status • Representation of support: Ensure we are reaching underrepresented communities. PSR take up rate will be analysed geographically to monitor for consistency of service. Range of take up by compared to modelled need by 		<ul style="list-style-type: none"> • Maintain our ISO standard accreditation • Representation of support: Reduce difference between upper and lower levels of support reach by community target tbc

	include research, engagement and accreditation.		<p>of creating demands on the time of the 3rd sector organisations, we will continue this consultative approach with specific organisations. when making changes to our ways of working.</p> <ul style="list-style-type: none"> • We have ensured customers' needs for an inclusive service for those needing extra help are reflected in our proposals. We have built this understanding from a wide range of internal and external data sources, customer research and stakeholder views as part of our ongoing What Customers, Communities and Stakeholders Want insight summary document 	community (Local Authority / MLSOA) will narrow over time.		
2.2	Companies should offer their customers a range of ways to interact and communicate. This includes allowing customers to opt for third party billing where appropriate.	Compliant	<ul style="list-style-type: none"> • We offer arrange of inclusive communication channels to help customers communicate with us, including email, post, phone, webchat and video call (See table 6) • We record details of Lasting Power of Attorneys (LPAs) and bill nominees on our systems • Customers can join our PSR by phoning us, using an online form or in writing <p>To improve our service we will:</p> <ul style="list-style-type: none"> • Our aim to prioritise inbound PSR customers in all channels. We are increasing our capacity to proactively broadcast updates to customers by recruiting 4 new Incident Communication Specialists to provide coverage from 7 days a week 7am to 9pm 	<ul style="list-style-type: none"> • PSR customer satisfaction. A lower than baseline score will represent inclusive service issues requiring intervention • Number of tailored propositions • Inclusive service accreditation status 		<ul style="list-style-type: none"> • By 2030 PSR customer satisfaction +/- 1% non PSR customer satisfaction • By 2030 we will increase in tailored propositions by 30% • Maintain our ISO standard accreditation

			<ul style="list-style-type: none"> • We will also implement 2-way messaging service via WhatsApp to allow us to check in on PSR customers at scale during incidents. 			
2.3	Companies should consult with CCW, and engage with stakeholders and other customer representatives, when making significant changes to their proposed service offering around vulnerability.	Compliant	<ul style="list-style-type: none"> • We meet regularly with CCW to gather insight and consult them on changes we are planning. • Our Customer Challenge Group reviews and challenges our plans and insight gathering. • As we make changes, we consult with the Consumer Council for Water (CCW) where appropriate. • We have gained insight from our Vulnerability Network (See section 7.1) 	Evidence of consultation and attendance at seminars and working groups	We are mindful of the impact we are having on the 3rd sector's time. We will maintain our engagement with these organisations, but only when the need arises or through collaborative industry forums.	
3.1	Companies should take active steps to identify customers who require extra help who have not yet been identified.	Compliant	<p>To grow and maintain our PSR we:</p> <ul style="list-style-type: none"> • Optimise points of customer engagement to spot risks of detriment and take the opportunity to register or refer for support for relevant services (See section 7) • Leverage the data we have, or can access from partners or open sources, to proactively register, refer or signpost customers for support (See section 7) • Deliver campaigns to increase awareness, in particular communities that are 	<ul style="list-style-type: none"> • Monitor the number of eligible customers registered on our PSR • Representation of support: Ensure we are reaching underrepresented communities. PSR take up rate will be analysed geographically to 	Our customer base is our notably higher levels of transience - customers moving in and out, or within, or region. Thames Water's total migration rate is	<ul style="list-style-type: none"> • Extend the reach of our PSR to 36% of eligible households, with 1.2 million customers by 2030 • Representation of support: Reduce difference

			<p>underrepresented to allow services to be extended to them (See section 7.7 and section 7.8)</p>	<p>monitor for consistency of service. Range of take up by compared to modelled need by community (Local Authority / MLSOA) will narrow over time.</p> <ul style="list-style-type: none"> • Support awareness survey – aware of at least one service proposition for either affordability or inclusive service. Our 1/4ly customer survey has been tracking awareness of support over 2020-2025 and represents our efforts to allow customers to make informed choices about available support. 	<p>18% vs 12% UK average. With nearly half of all properties in London being rented transience presents us with a unique set of challenges in building our PSR and maintaining it.</p>	<p>between upper and lower levels of support reach by community target tbc</p> <ul style="list-style-type: none"> • By 2030 80% of customers surveyed will be aware of at least one service proposition for either affordability or inclusive service
3.2	Companies should take steps to proactively increase customer awareness of the extra help available to those who need it.	Compliant	<ul style="list-style-type: none"> • Our approach to extending the reach and awareness of our services focusses on data sharing (See section 7.3) and community campaigns to efficiently reach both large numbers of customers and those who are underrepresented. To help us reach those underrepresented we will analyse data to identify area of focus and seek to partner with appropriate local cultural groups to reach customers. We have engaged over 20 local authorities and were planning to have data 	<ul style="list-style-type: none"> • Monitor the number of eligible customers registered on our PSR • Representation of support: Ensure we are reaching underrepresented communities. PSR take up rate will be analysed geographically to 	<p>London is the most ethnically diverse part of the UK, with 46% of households identifying with Asian, black, mixed or 'other' ethnic groups. 37% of</p>	<ul style="list-style-type: none"> • Extend the reach of our PSR to 36% of eligible households, with 1.2 million customers by 2030 • Representation of support: Reduce difference

			<p>sharing in place with a local authority during 2020-2025. However, we were not able to overcome barriers of resource constraints and incorrect perceptions of the legal basis. We have now put this activity on hold while we focus on supporting industry efforts to create consistent ways of working that are scalable to work with the Energy sector. We have also been engaging cultural groups to develop our community campaigns approach (See section 7.3 and See section 7.4)</p>	<p>monitor for consistency of service. Range of take up by compared to modelled need by community (Local Authority / MLSOA) will narrow over time.</p> <ul style="list-style-type: none"> • Support awareness survey – aware of at least one service proposition for either affordability or inclusive service. Our 1/4ly customer survey has been tracking awareness of support over 2020-2025 and represents our efforts to allow customers to make informed choices about available support. <p>Note: includes payment plans and direct debit</p>	<p>Londoners identifying as ‘white British’ is less than half of every other region in the UK. This presents us with a unique set of challenges when raising awareness of our PSR service proposition. Willingness to undertake PSR data sharing is hampered by a lack of central coordination and direction. We have been lobbying on this and Government have now responded with proposals to create a central PSR.</p>	<p>between upper and lower levels of support reach by community target tbc</p> <ul style="list-style-type: none"> • By 2030 80% of customers surveyed will be aware of at least one service proposition for either affordability or inclusive service
3.3	Companies should train their staff to spot potential requirements	Compliant	<ul style="list-style-type: none"> • Our customer facing teams undergo vulnerability spotting training • Every single employee receives yearly vulnerability e-learning refreshers (co - designed with Money Advice Trust) (See 	<ul style="list-style-type: none"> • Monitor the number of eligible customers registered on our PSR • Representation of support: Ensure we are 		<ul style="list-style-type: none"> • Extend the reach of our PSR to 36% of eligible households, with 1.2 million

	for extra help, even when a customer has not previously declared it.		section 7.5). This is mandatory training and we track / report completion rates. We see thousands of customers per month join our PSR through this route.	reaching underrepresented communities. PSR take up rate will be analysed geographically to monitor for consistency of service. Range of take up by compared to modelled need by community (Local Authority / MLSOA) will narrow over time.		customers by 2030 5 • Representation of support: Reduce difference between upper and lower levels of support reach by community target tbc
3.4	Companies should actively consider how they can reduce communication burdens on customers who need extra help; this could include establishing data sharing arrangements with partner organisations.	Exceeding	<ul style="list-style-type: none"> • We have data sharing arrangements in place with energy companies, London, Wiltshire and Dorset Fire Brigades and have engaged over 20 local authorities about data sharing, this was unsuccessful, but the lessons learnt have been fed into the development of industry solutions led by the Water UK and Energy Network Association. • We established the first Energy (UKPN) – Water partnership that systemised the two-way exchange of customer PSR details. • We led the industry direction away from explicit consent as a method of capturing PSR data and pioneered data sharing between statutory bodies and energy companies with the creation of the Essential Sharing Network • We automatically add customers to our PSR when they reach 80 years old where we hold their date of birth (See section 7.3) 	<ul style="list-style-type: none"> • Monitor the number of eligible customers registered on our PSR • Representation of support: Ensure we are reaching underrepresented communities. PSR take up rate will be analysed geographically to monitor for consistency of service. Range of take up by compared to modelled need by community (Local Authority / MLSOA) will narrow over time. • Support awareness survey – aware of at 	We have been engaging with over 20 local authorities and were planning to have data sharing in place with a local authority during 2020-2025. However, we were not able to overcome barriers of resource constraints and incorrect perceptions of the legal basis. We have now	<ul style="list-style-type: none"> • Extend the reach of our PSR to 36% of eligible households, with 1.2 million customers by 2030 and 90% of eligible households by 2035 • Representation of support: Reduce difference between upper and lower levels of support reach by community target tbc

			<ul style="list-style-type: none"> • Third parties and family members can sign up customers • We sponsored the National Preparedness Commission to research data sharing, resulting in publication of 'The Data-sharing Imperative: Lessons from the Pandemic' and a workshop with stakeholders across regulators, government, industry and the 3rd sector. This was part of our efforts to influence stakeholders including Government to provide stronger direction on sharing PSRs across industries. 	<p>least one service proposition for either affordability or inclusive service. Our 1/4ly customer survey has been tracking awareness of support over 2020-2025 and represents our efforts to allow customers to make informed choices about available support.</p> <p>Note: includes payment plans and direct debit</p>	<p>put this activity on hold while we focus on supporting industry efforts to create consistent ways of working that are scalable to work with the Energy sector.</p>	<ul style="list-style-type: none"> • By 2030 80% of customers surveyed will be aware of at least one service proposition for either affordability or inclusive service
4.1	Companies should take appropriate steps to record customers' extra help needs. These records should be held securely and in line with wider data protection requirements.	Compliant	<ul style="list-style-type: none"> • Our contact centre teams can register on the PSR without any referral to a specialist team and update records directly into the customer relationship management system • Customers can register on our portal which then is automatically loaded into our systems. This portal also supports customers updating their records as well as the negligible volume of customer driven removal requests. • Our PSR is held securely within our billing system and in line with Data Protection requirements. 	<ul style="list-style-type: none"> • PSR attempted / actual contact with customers on PSR > 2 years. Represents our efforts to maintain accurate data • Our Data Protection Committee monitor our data protection compliance performance 		<p>By 2030 we will attempt to contact 90% of customers on our PSR and make contact with 45% of PSR customers</p>

4.2	Companies' records should be reviewed regularly to ensure they are up to date.	Compliant	<ul style="list-style-type: none"> • We use employee spotting, signposting and referrals to grow and maintain our PSR (See section 7.5) • Our systems automatically generate emails or letters to customers to prompt them to check in with us to ensure their details are up to date 2 years after our last engagement with the customer. (See section 6.1) • Customer can also update their details on our portal at any time or call in to our contact centre (See section 6.2) 	PSR attempted / actual contact with customers on PSR > 2 years. This represents our efforts to maintain accurate data		We will continue to attempt to contact 90% of customers on our PSR and make contact with 45% of PSR customers
4.3	Companies should consider how their records of customers' needs can be designed in a way that can help deliver wider benefits to their customers; for example, reducing communication burdens for customers through data sharing.	Compliant	<ul style="list-style-type: none"> • All our systems used to serve customers include the industry aligned 'need codes' This provides a consistent view of the PSR that supports interactions with customers and enables effective data sharing with other organisations (See section 6.3) • We use Legitimate Interest / Substantial Public Interest approach which is endorsed by the ICO to enable capturing PSR data and greater data sharing between organisations. This reduces the effort to capture details, allowing third parties, such as carers and support organisations to register customers more simply (See section 6.3) • Our customer PSR data is connected to all the systems used by our customer facing teams to enable tailoring of interactions and processes (See section 6.1) 	PSR attempted / actual contact with customers on PSR > 2 years. Represents our efforts to maintain accurate data	We have been engaging with over 20 local authorities and were planning to have data sharing in place with a local authority during 2020-2025. However, we were not able to overcome barriers of resource constraints and incorrect perceptions of the legal basis. We have now put this activity on hold while we	We will continue to attempt to contact 90% of customers on our PSR and make contact with 45% of PSR customers

					focus on supporting industry efforts to create consistent ways of working that are scalable to work with the Energy sector.	
4.4	In designing their approach to recording and, where relevant, sharing customer vulnerability data, companies should clearly explain to customers how their data will be used, including any choices available to them. Companies should take steps to understand	Compliant	<ul style="list-style-type: none"> • We signpost customers to our Privacy Notice in our online PSR application form and in our PSR Welcome letter • Customers who register over the phone are told about how we use their data and made aware of our Privacy Notice. • We publish our How we handle your priority services data - Privacy Notice on our website so customer can understand our approach and how to contact us if they have any questions or concerns • We have carried out research on acceptability of sharing data, which confirmed customers were happy with our approach (See section 7.3) 	PSR customer satisfaction. A lower than baseline score will represent inclusive service issues requiring intervention		By 2030 PSR customer satisfaction +/- 1% non than non PSR customer satisfaction

	how their customers who need extra help feel about the use of their data.					
5.1	Companies should develop and maintain a vulnerability strategy setting out how they plan to support the extra help needs of their customer base.	Compliant	<p>We have published this vulnerability strategy and this table setting out how we meet the guidance and our improvement plans</p> <ul style="list-style-type: none"> • Designed business-as-usual governance to provide oversight to the delivery of this strategy 	<ul style="list-style-type: none"> • Monitor compliance with Ofwat guidance 		<ul style="list-style-type: none"> • Vulnerability Strategy published by 30 June 2025 • 100% alignment with vulnerability guidance minimum expectations
5.2	Companies should take steps to understand the likely underlying requirements for extra help in their areas.	Compliant	<ul style="list-style-type: none"> • As we have developed our plans, we have ensured customers' needs for an inclusive service and extra help are reflected in our proposals. This has been achieved by using an approach whose foundations were laid developing previous strategies and are now part of our ongoing ways of working (See section 5.2) 	Vulnerability Strategy published on our website		Vulnerability Strategy published by 30 June 2025

