Vulnerability Strategy

Providing an inclusive service

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Contents

1. Executive summary

This document sets out 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.
- Grown our Priority Services Register (PSR) to 75% of the eligible population by 2030, at 1.2 million households, and make a 30% increase in the number of tailored propositions.
- 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 2025-2030: Bill impact, affordability and vulnerability strategy.

We aim to provide a fully inclusive service which can be accessed by everyone so that customers are able to interact with us however they need to, 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 standards[1], and ensuring our written content is aimed at a reading age of 12 ensures everyone can access information. These along with many other steps we have taken have helped us achieve the ISO Standard for Inclusive Service accreditation. Details of our inclusive service propositions can be found in Table 5.

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.

We recognise that our customers have needs that require us to tailor our service so that it's inclusive, with support provided during incidents. Since 2020 our Priority Service Register (PSR) has grown from 82k to over 451k households at March 2024, through a combination of data

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[1] Guidelines to ensure web content is accessibility

sharing, using data proactively, employee spotting customers needing extra support while serving customers, marketing campaigns and working with partners.

Our plans extend the reach of our priority services from 25% to 75% 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 78%[2] 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 this area from our Vision 2050 strategy in section 3 and then our understanding of customers in our region and their extra help needs in section 4. Section 5 describes our approach to meeting customer needs, providing an inclusive service and then section 6 describes how we plan to extend the reach of our extra help, so more customers receive the help they need. Section 7 summaries how this strategy will be delivered and the data and 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: 2024-2025
- Medium term: 2025-2030
- Long term: Beyond 2030

We believe the introduction of a new customer focused licence condition is a positive step forward for customers and the water industry and we appreciate Ofwat's efforts to raise the standard of extra care support across the industry. Our plans enable our alignment with the new licence condition and we are committed to aligning with the Vulnerability Guidance.

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[2] Thames Water Analysis

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	Employees are proud of our service delivery for those needing extra help
Operational metric	75% of eligible customers (1.2m households) are registered on our PSR	Operational metric	80% aware of at least one service proposition for either affordability or inclusive service

Where we focus	How we serve
• 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	• Grow our PSR through data sharing and working with partners to engage underrepresented communities • 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

Objectives

Attempt to contact 90% PSR customers within 2 years and 45% actual contact	Maintain inclusive service accreditation	Increase number of tailored propositions by 30%
100% of Ofwat vulnerability guidance minimum expectations	Improve representation of support - tbc	Incident management CSAT - tbc

2. Vulnerability guidance

We have set out how our approach demonstrates compliance with Ofwat's 'Service For All - Vulnerability Guidance[3] in the Annex 1. We have reviewed our plans in response to the guidance being published and made some adjustments to our strategy in response. For example, we will make it easy for customers to seek redress if they are not satisfied with the provision of extra help they received.

Following the CCW Vulnerability Workshop in February 2024 we 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 has been built into our strategy. We are supportive of creating a core set of PSR services which all companies should offer if there is strong alignment between organisations.

3. 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 Strategy[4]. This includes our ambitions for customers, specifically that customers feel we offer value for money and send them affordable, accessible bills. Our vision for 2050 is driven by customer research documented in our Customer Engagement document[5].

Our Vision 2050

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[3] Service-for-all---Ofwats-final-vulnerability-guidance-for-water-companies-supporting-customers-who-need-extra-help.pdf
[4] Our long term delivery strategy
[5] Customer engagement

	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
For customers	

Our vision 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, form initial registration to ongoing changes in their situation. We can make our services easy and accessible for those needing extra help and supporting our customers needing extra help with repairs for leaks, wastage and advice to reduce inefficient use of water. We will 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. We will 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.

3.1 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 1 summarises our performance at the end of 2023/24 and our forecast for the end of 2025.

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 people to utilise this information when serving customers and update customer records. These updates, along with automated campaigns to request updates from customers, has allowed us to ensure 47% of customers on the PSR for greater than 2 years have had their records[6] updated in the last 2 years. We have also achieved the ISO Standard for Inclusive service. Our Performance Commitment to improve the customer satisfaction CSAT score of PSR customers to 91% is not yet on target. During AMP7 our PSR customers CSAT score has been between 0.2 and 2%[7] higher than the general customer base showing that 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.

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[6] Thames Water Analysis
[7] Thames Water Analysis

Table 1: Progress and forecast against our vulnerability Performance Commitments

Performance Commitment	Target	End 23/24[8]	Commentary
Common PSR: • Extend reach of PSR	7%	7.7%	Mix of data sharing, partner referral and signposting, spotting and embedding into channels delivering growth and hit target of 7% 12 months early.
• Attempt contact with PSR customers > 2yrs	90%	91%	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%	47%	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	88%	Dissatisfaction not driven by inclusive service issues. General customer experience plans will improve CSAT for PSR customers.

3.2 Steps towards our 2050 Vision

By 2050, we will have continued to build our Priority Services Register reaching a point where this target is close to the number of customers eligible for these services, which will change over time with our demographics.

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 accreditation 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 2: Long term view of extra help measures.

Outcome	2025-2030	2030-2035	2035-2040	2040-2045	2045-2050
PSR reach of eligible population[9]	75%	90%	95%	95%	95%
Enablers	• Incident response maturity • Data sharing building maturity and efficiency • Master data management strategy • Waste only PSR	• Data sharing maturity across different sectors • Data driven levels of consistency in service provision • Continuous improvement in line with technology enablers			

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[8] Thames Water Analysis
[9] Eligible population is 24% of our households served, based on external research

4. Our customers – understanding their inclusive service needs
4.1 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 the majority of customers, can be inappropriate for those needing extra help due to their personal characteristics, circumstances, ability to access services and represent their interests, which can create a risk of detriment. Figure 2 and Table 3 describes some of these scenarios and ways of working that we have in place to mitigate harm to further illustrate our understanding of extra care provision.

Figure 2: How a customer's circumstances and practices of an organisation can create a risk of detriment
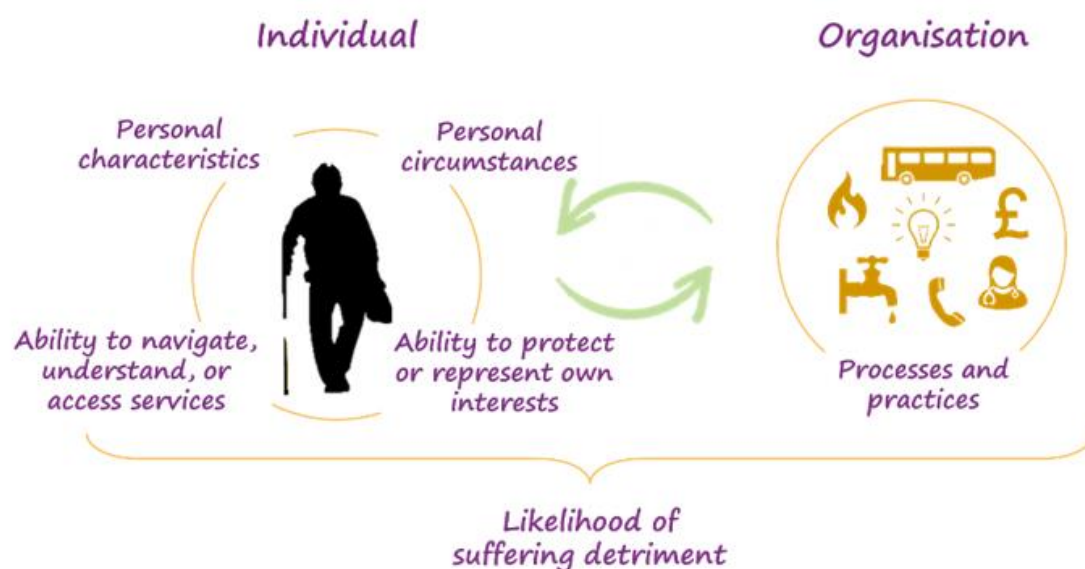
Source: Vulnerability Research for Thames Water by Community Research

Table 3: 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	• 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	• Provision of inclusive channels for communication and information • Channel preferencing

Supply interruptions	• Customers with mobility issues who are unable to go and get alternative supplies, or have a medical dependency on water	• Prompt provision of information and alternative water or other support
Home visits	• Unable to facilitate our people's entry to a home either due to physical or mental capacity, or concerns about scams	• 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 through:

- 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
- Deliver campaigns to increase awareness, in particular communities that are underrepresented to allow services to be extended to them

4.2 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 whose foundations were laid developing previous strategies and are now part of our ongoing ways of working. Figure 3 describes our approach to gathering insight.

Figure 3: Sources of insight
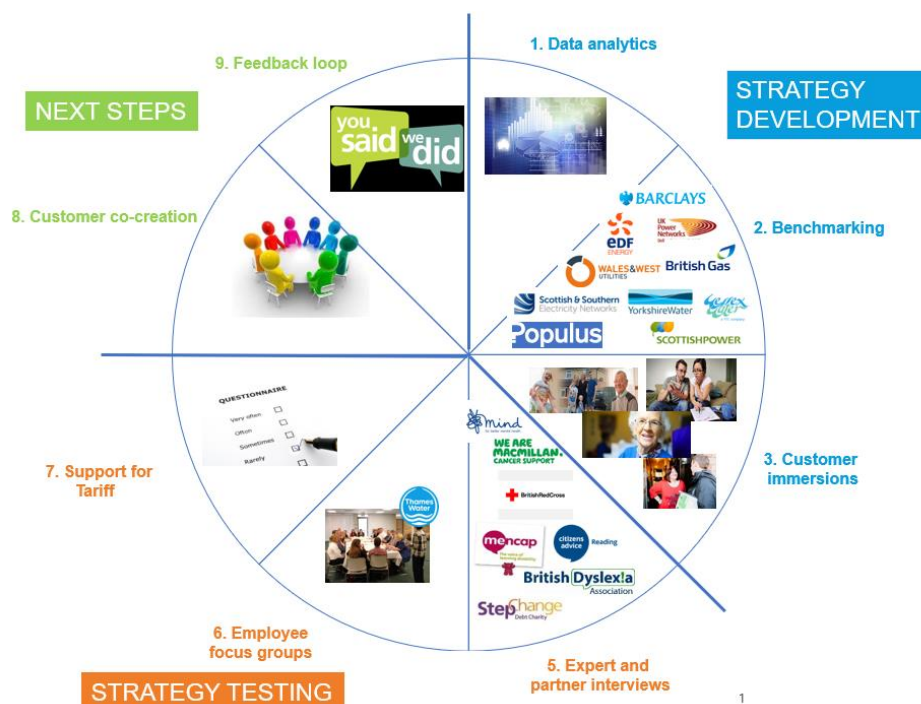
Understanding our customers' expectations with regards to extra care is essential for us to assess the effectiveness of our support package for customers who need extra help. We have therefore conducted an engagement programme with our customer base. Insight from customers and stakeholders across our engagement programme is consolidated periodically as part of ongoing iterations of What Customers, Communities and Stakeholders Want[10]. 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 in order to support them most effectively. 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 provide[11]. 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 low[12]. 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, rather than changing or adding the services we provide[13].

4.3 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%[14] 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 depravation are more likely to have a range of health conditions including serious mental illness, obesity, diabetes and learning difficulties. Our research identified that 61%[15] of our customers are defined as vulnerable. Overall, these customers are most likely to

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[10] Thames Water Analysis
[11] Thames Water Analysis
[12] Thames Water Analysis
[13] Thames Water Analysis
[14] JR Foundation, 2023, UK Poverty 2023: The essential guide to understanding poverty in the UK.
[15] Thames Water Analysis

be middle and working class and not working/retired and overlap between groups is relatively small.

Non vulnerable 39%

12%

Financially vulnerable

English second language **19%**
New parent **3%**

8%   3%

2%

Disabled   3%   65 and over

12%   8%

Source: Thames Water research[16]

'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'
'Financially vulnerable' = TW dual customers who have a household income under £17,005, London under £21,760 (thresholds updated in Q4 2022-23)
Speaking English as a second language and being a new parent added to vulnerability classification in Q1 23/24
Source: Brand Survey, Yonder, Q1 to Q4 2023-24, base size: 2,323

Figure 5 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.

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[16] Thames Water Analysis

Figure 5: Volume of customers in vulnerable circumstances against a subjective view of Priority Service impact
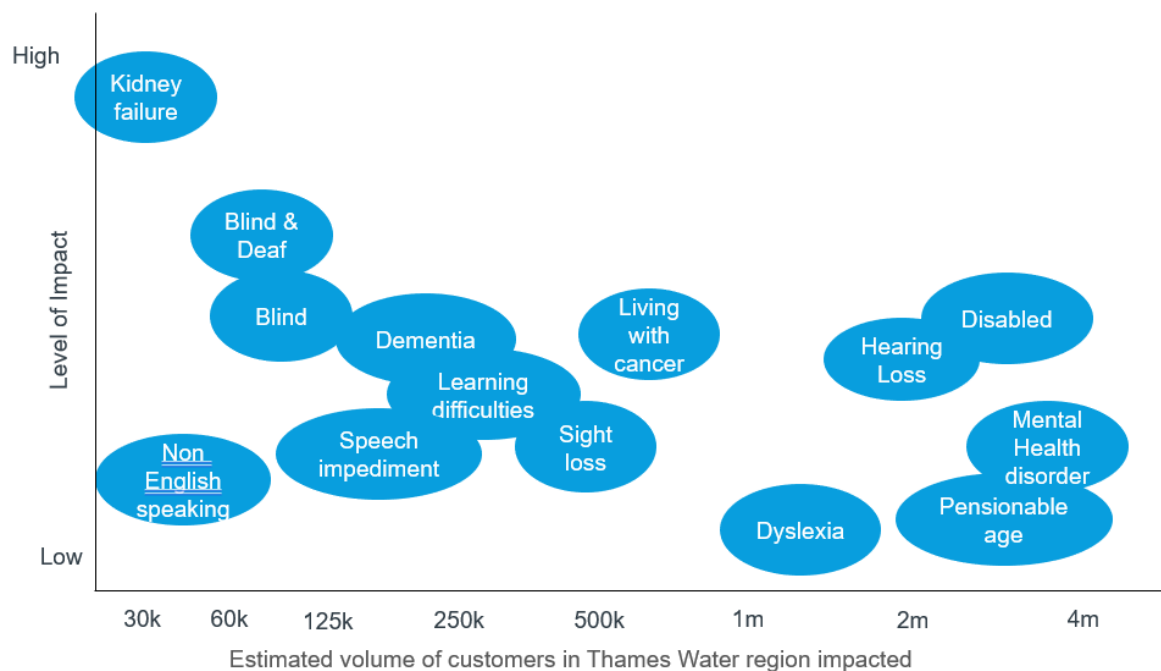
Source: Thames Water analysis[17]

London is the most ethnically diverse part of the UK, with 46%[18] of households identifying with Asian, black, mixed or 'other' ethnic groups. 37% of Londoners identifying as 'white British' is less than half that of every other region in the UK.

Figure 6: Ethic diversity in our area

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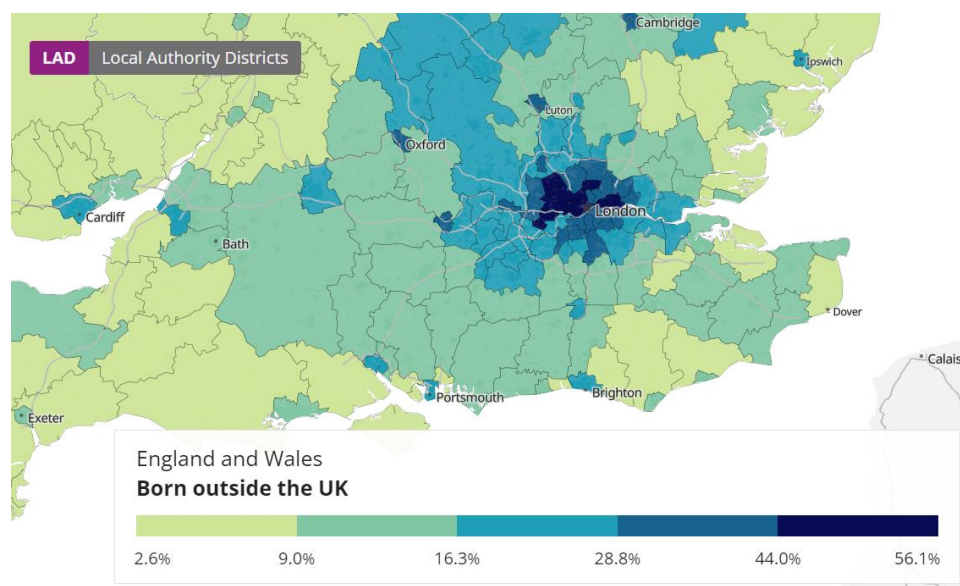
[17] Thames Water analysis
[18] Census 2021

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 average [19]. 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.

4.4 Understanding our underrepresented customers

To help us develop our plans we commissioned Community Research to conduct a 'deep dive' into the lives of customers who are living in vulnerable circumstances, with 75 in-depth one-hour interviews taking place, and 6 interviews with advice and support organisations during Autumn 2023.

Census data was used to identify target segments. The customer research focused primarily on customers from minority ethnic backgrounds (56 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 7.

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[19] Thames Water Analysis

Vulnerability among customers under-represented in research

75	in-depth hour long interviews, mix of face to face, online and telephone	56 from South Asian, Black African, Black Caribbean, or Eastern European backgrounds	48 in low income households	13 with no/limited English	17 with poor mental health
		30 brought up outside of UK	21 with no/limited access to internet	30 disabled	Research to inform PR24 vulnerability strategy and ongoing plans

Water habits influenced by culture

Religion and experience in other countries means water seen as sacred and precious

Many drinking bottled/ filtered water due to habit/ concerns over quality and source of tap water

Reliance on community

Culture of keeping problems close, within family or community

Some more self-reliant; others have strong culture of family and community support

Stronger formal and informal networks amongst South Asian customers

Community-specific influencers important (e.g. Imams; community-specific social influencers)

Affordability a real issue

Nearly all under financial strain

Some examples of extreme poverty

Water not the main stressor, but part of the overall pressure of rising costs

Limited understanding of bills

Many only pay attention to headline amount

English literacy low in some communities (especially amongst first generation)

Lack of understanding of choice over instalments, pay dates and ways to pay

Low awareness and inconsistency

Few had heard of support offers from Thames Water, and many would welcome them

Some reported an inconsistent response when they needed support, depending on who called and on individual call operators

Some on social tariffs/ PSR had learnt of them from friends, or only when they called Thames Water in difficulty

Source: Community Research for Thames Water

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.

4.5 The scale of the challenge ahead

Table 4 below describes some of the characteristics of those needing extra help in our region and the challenges that this creates for us to overcome. Our literature review, primary research and operational experiences allows us to understand our customers diverse needs on a day-to-day basis.

Table 4: Characteristics of those needing extra help in the Thames Water region

Dimension	Challenge
46%[20] 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%[21] 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[22], 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[23]	Increased requirement for Priority Service provision to support independent living through inclusive service.
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%[24] 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[25] 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

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[20] Source: FCA Financial Lives Survey . Over 78% of UK are adults. Average occupancy of UK 2.36 Our 5.8m households are of 21% of 27.8m in UK

[21] Vulnerability in Britain 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%.

[22] MET office

[23] ONS

[24] ONS

[25] Thames Water analysis

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**

A number of 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 crisis[26] either through stress, or the health impact of compromising on spending on food and heating.

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[27], 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 reseach 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.

5. Inclusive service - Supporting customers who need extra help

5.1 Our approach to providing an inclusive service for those needing extra help

We have built the infrastructure to provide a proactive inclusive service through the formation of policies, processes and systems as described in Figure 8. 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

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[26] British Medical Journal
[27] ONS

the ISO standard, making a total of four 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 common Performance Commitment target of 90% for attempted contacts and along with other channels has seen us also exceed the actual contact target of 35%, with 47% of customers on the PSR for greater than two years engaging with us.

Figure 8: Our approach to providing inclusive service.
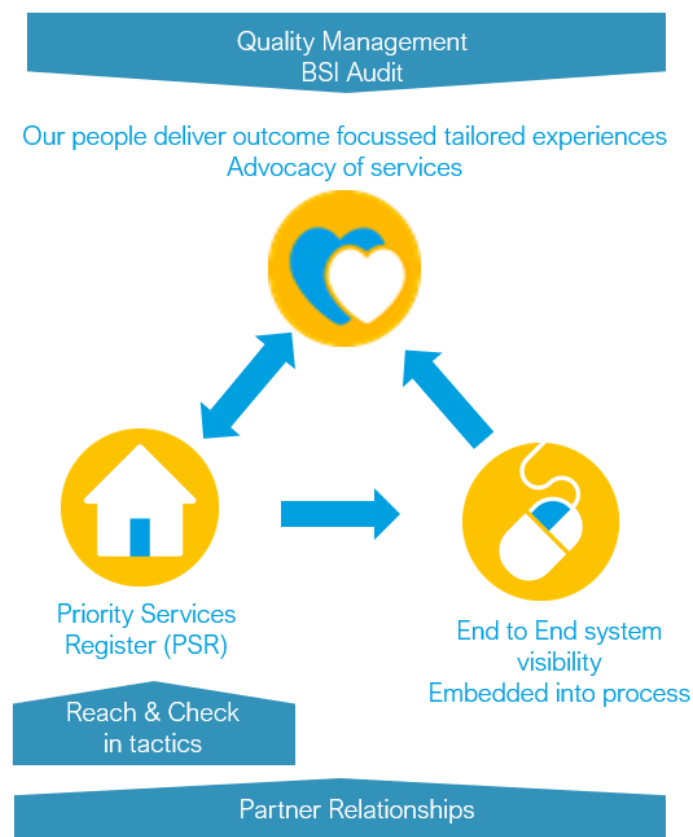
Source: Thames Water

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 10,000 households per month, net 7,000,[28] during 2023/24. This has led to us exceeding our target of 410k customers on our PSR, equivalent to 7% of our base, 18 months early[29]. Our approach to increasing awareness and reach of our services is described in more detail in section 6.

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[28] Thames Water Analysis
[29] Thames Water analysis

PSR data informs conversations on the phone and on the doorstep, facilitates inclusive communication formats and tailored processes. Table 5 provides a summary of the propositions we deliver.

When monitoring customer satisfaction scores for customers on our PSR we see a slight improvement, typically 1%[30], 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 and described in section 5.2. As our customer service improvement plans described in our Customer Strategy[31] 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 23 [32] currently, as shown in Table 5.

Table 5: Our inclusive service propositions with 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	- 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	- 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	**Trained people aware of needs to tailoring conversations and service** - Doorstep password **Regular check in on circumstances** **Systemised PSR registration with UKPN** **Proactive registration for over 80-year-olds** - Customers can choose to have someone they trust present when we visit	- Specialist bereavement team - Hardship fund referrals - Signposting to supporting partners

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[30] Thames Water analysis
[31] Our customer strategy
[32] Thames Water analysis

Operational Services	• Proactive contact during a water outage • Proactive delivery of alternative water • Support from Customer Reps during an incident • **Flooding – prioritised response** • **Waste – prioritised response during peak demand** • **Priority phone line, front of the queue bypassing IVR** • Advance notice of planned supply interruptions • Complaints – prioritised response	• Staff identity checks • Meter relocation • Help reading a meter • Water quality checks • Knock and wait

5.2 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 Priority Service Register that supports 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 people 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. 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 subsequently endorsed this change and now all water companies and DNOs 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 also Wiltshire Fire Brigade, with more details in the case study below.

Figure 9: Our partnership with London Fire Brigade

Case Study: Fire Brigade data sharing
Every month around 2000 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 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 focus on supporting industry efforts to create consistent ways of working that are scalable to work with the Energy sector.

We have worked with third parties to improve our knowledge and implemented a new training programme which has been rolled out to all our customer facing people, 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 6: 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 6, have seen our PSR grow from 1% to 7.7%[33] of households served, with 8% anticipated at April 2025. Gross growth of 10k per month is achieved through data sharing, our employee's spotting, signposting and referrals from partners. We will maintain the quality of our data with our automated check in process 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) to AA standard – a level that many organisations strive to meet[34]. This allows screen readers, translators, and other adaptive technology to be applied by users. We have been continuously 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%[35].

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, and by looking across the industry for best practice. We then commissioned external research agency Yonder to conduct in-depth interviews with a diverse set of 28 customers to get their feedback on the 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 10.

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[33] Thames Water analysis
[34] Web Content Accessibility Guidelines
[35] Thames Water analysis

Figure 10: Our partnership with Plain Numbers[36]

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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.

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We have increased the number of support propositions from 11 to 23 as shown in Table 5. 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 how to support those living with Dementia with Dementia UK. This ensures that the information given to our customer facing people 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. All customers get a rapid response to a blockage but there are times when we have a peak in demand and we need to extend customer promises, typically due to high levels of rainfall in the winter and over a shorter period during summer storms. At these times blockage clearance service levels can increase from 48 hours to 72 hours, or in extreme situations 5 days. However, PSR customers service levels are protected, and the standard 48 hours is maintained throughout peak periods.

As we plan to improve response times for blockages, we are testing a 24-hour service level in one operational region and for all PSR customers. We will learn from this and target 24-hour response times across our region for all customers in 2025-2030.

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

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[36] FCA – Poor numeracy is the most prevalent form of vulnerability

when prioritising repairs. As a result, there is typically less than 0.2%[37] of outstanding work related to PSR customers, despite 7% of households being on our PSR.

We have restructured how our PSR data is used during incidents with priority tiers utilised to focus our support where it is most needed. This, along with the increase in reach of our PSR, gives us greater visibility of which customers require support. However, we have not always been able to proactively deliver water to all customers within the timescales that are acceptable. To improve this, we are in the process of investing in a more resilient supply chain to improve our incident response as described in our Customer Strategy[38]. 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. This represents the progress that we need to make on supporting customers during supply interruptions and incidents.

Together, these investments have allowed us to meet BSI 18477 for inclusive services for the last three years and upgrade from the current British Standard to the ISO standard and Kitemark in the forth 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%. PSR customers record satisfaction scores of 88% compared to non PSR customers at 87%. Our customer service improvement plan will drive this more than our vulnerability strategy, 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 would not close the gap on the target.

5.3 Our plans for inclusive service 2024-2025

Having reviewed our current service against the vulnerability guidance we have identified further improvements. Our short-term plans focus on the following areas:

- **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.
- **Alternative water provision -** We will significantly increase field resources to provide alternative water during a supply 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 from 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%[39] of incidents.

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[37] TW analysis – Data provided by Ben Jones

[38] https://www.thameswater.co.uk/media-library/home/about-us/regulation/our-five-year-plan/pr24-2023/our-customer-strategy.pdf

[39] Thames Water analysis

- **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 5.4 for further information)
- **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.
- **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.
- **Accreditation -** Maintain our ISO standard accreditation.
- **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.
- **Incident communications –** During an incident, customers will be able to contact 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.

  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.

5.4 Providing clear information about our services

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 do not receive alternative water support.

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.

Our aim is to ensure customers understand the services they will receive and provide them with personal updates on whether we are able to provide them 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 will also investigate if we can make 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.

Table 8: 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 based. 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	Customer receive a standard welcome letter explaining our PSR services	Personalise letters to confirm services selected and set expectations on alternative water delivery.

During an incident	Provide information to all customers about the incident via SMS and our website and social media	Provide PSR customers with updates on deliveries of bottled water

## 5.5 Our plans for inclusive service 2025-2030

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. Continuing our current strategy will enable us to:

- Extend the reach of our PSR to 75% 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.
- 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 and are therefore aiming for 75% of those eligible, up from 30% at the end of 23/24. This equates to 1,165,000 households and will require a step change in the maturity of our current approaches to engage customers, which is described in section 6. Figure 11 describes the growth of our PSR.

Figure 11: PSR growth over 2020-2030
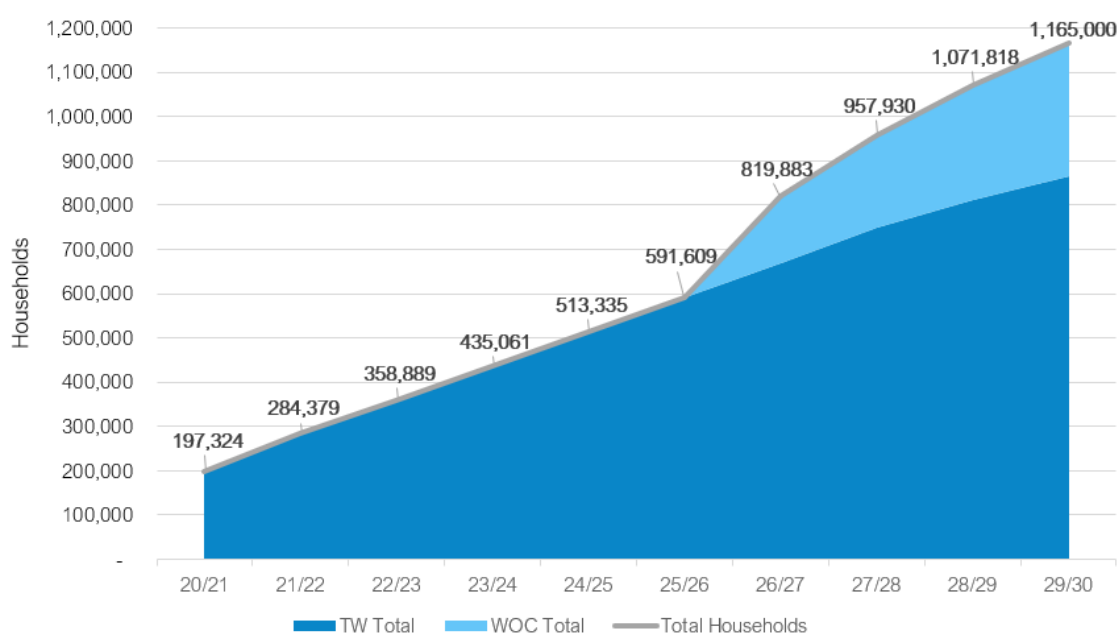
Source: Thames Water

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, as described in our Customer Strategy[40] 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 CapEx 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

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[40] Our customer strategy

communities where our proposition reach has not met expected levels of penetration. We will build on the insight taken from our recent pilot, 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 6 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 8 summarises the service propositions that we plan to develop between 2025-2030. By 2025 we will have almost trebled the number of services that we deliver for customers and will deliver another 10 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.

Customer's 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%[41] of PSR customers only have landline, implementation this solution will enable us to reach these customers during an incident.

Our field teams that deliver alternative water will be insourced to enable us to take advantage of different workstreams to support peaks in demand during large incidents. For example, courier drivers will be part of our ground's maintenance teams allowing grass cutting to be paused during incident support.

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[41] Thames Water analysis

We'll 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. We will 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 10042 customers per year.

Table 9: 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	• Language translation • Braille / large print communications • Coloured backgrounds • Accessible website • Text Relay • Video relay for BSL	• 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	• Trained people aware and tailoring conversations and service • Doorstep password • Hardship fund referrals • Regular check in on circumstances • Signposting to supporting partners	• Real time quality management • Prior engagement before impactful works • Knock and wait • Specialists to support with sensitive scenarios, eg, mental health / dementia / chronic sickness
Operational Services	• 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	• Incident management consistent and at scale • Water operations prioritised response during peak demand • Optimised waste response model

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[42] Based on 18% PSR customers within 800 surveys, and 70% providing identifying details.

6. 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. This is because customers often benefit from both types of support and the approach to external engagement and extending the reach of our services is similar.

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 to help us create a broad and inclusive service. There are three areas that we focus on:

- Assisting us in improving the quality of our service by providing insight as to the needs of consumers that organisations represent and highlight gaps in service provision.
- Help us 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 - section 6.2 explains our overall approach to extending the reach of our services.

### 6.1 Working with external partners to improve service

Our approach to working with stakeholders is described in Figure 12. We have over 200 organisations that we make aware of our support through mass communication channels such as newsletters and webinars. 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, we identified the opportunity to create a British Sign Language channel for our customers which now supports over 3000[43] phone calls a year. We are 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 13. 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.

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[43] Thames Water analysis

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 plus 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.

Figure 12: Our approach to engaging with stakeholders
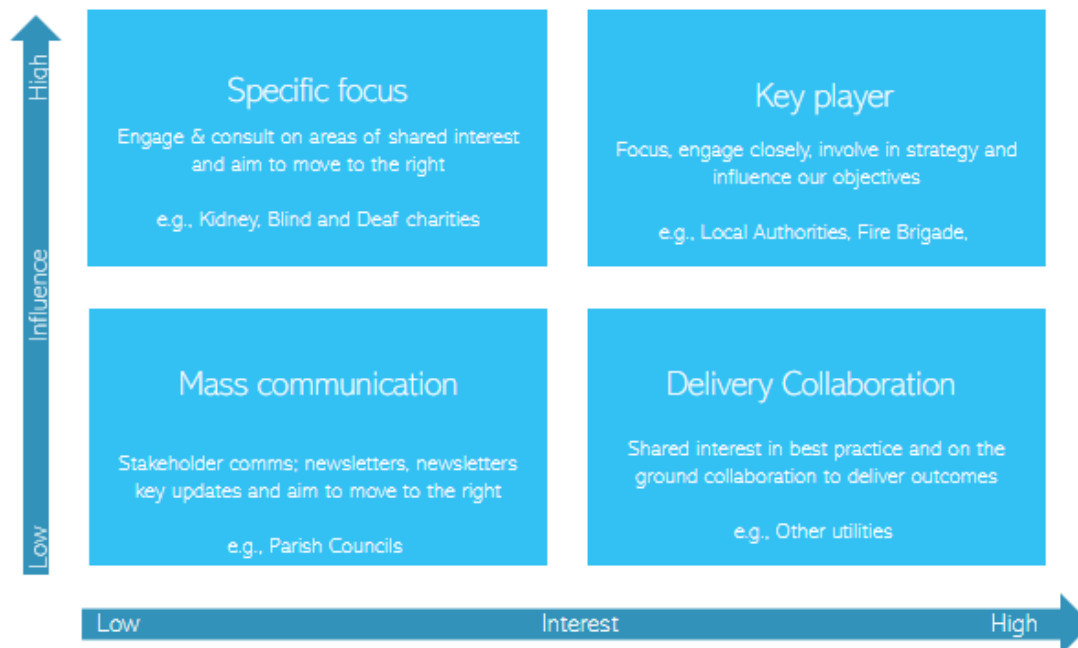
Source: Thames Water

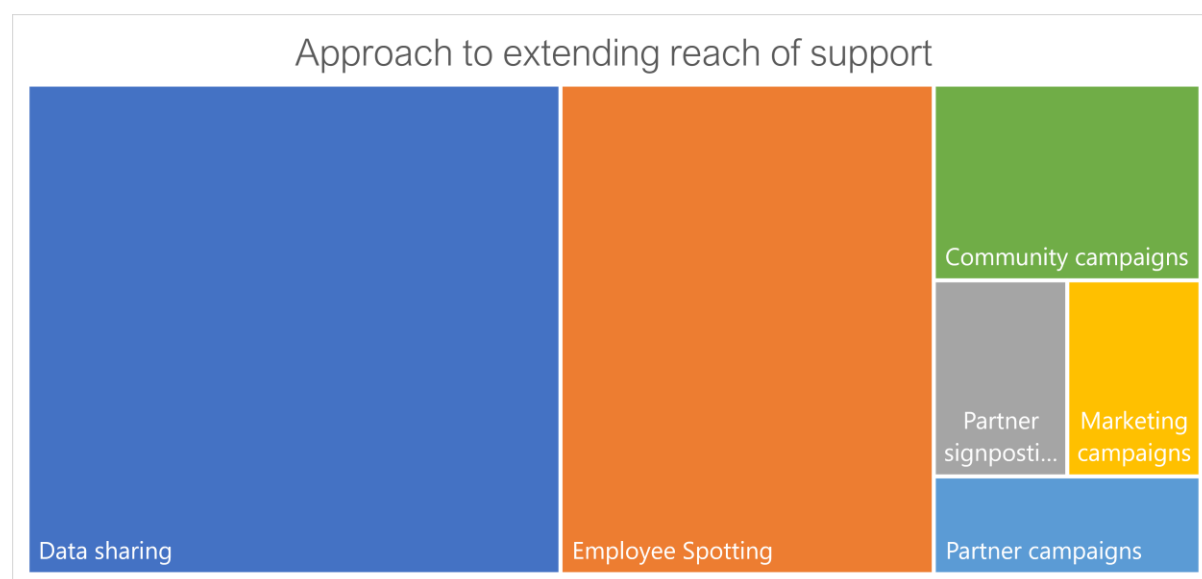Figure 13: Stakeholders that are part of our Vulnerability Network

6.2 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 increased from 55% to 78%[44] since 2020, we recognise that awareness of our support is not high enough. 49%[45] of our customers are aware of our PSR through this survey, and in the latest CCW Water Matters survey an awareness level of 47%. Typically, those with the greatest need have the lowest awareness.

While we have made great progress in extending the reach of our PSR we know we need to do more. We will keep maturing our capabilities with a number of data sharing partners, consistency in employee spotting, working with partners to promote signposting or specific campaigns, and continue our baseline of marketing campaigns. Figure 14 describes how our different approaches to extend proposition reach contribute by volume, with each segment proportionate to the volume of customers engaged through the channel.

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.

Figure 14: Presentation of how relative volume by channel will contribute towards increasing the reach of propositions

Approach to extending reach of support

Data sharing | Employee Spotting | Community campaigns | Partner signposti... | Marketing campaigns | Partner campaigns

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[44] Thames Water research
[45] Thames Water analysis

Data sharing progress since 2020

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 1,000 referrals from Thames Water which so far have resulted in 345[46] fire prevention visits being undertaken through our data sharing over the year from April 2023 to March 2024. London Fire Brigade want to receive our data but due to capacity issues are unable to do this currently.

As a result, over 85,000[47] PSR records will have been exchanged between Thames Water and external organisations during 22/23 and we expect this to only grow with time.

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

We have built expertise from this process 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, along with being part of the Northumbrian Water 'Support for All' initiative, 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.

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[46] Thames Water data
[47] Thames Water analysis

Data sharing - Increased scale in 2025-2030

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 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 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 a long 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.

6.4 Community campaigns

Community Campaigns Pilots in 2020-2025

From testing ways of working with partners, for example Sense and Age UK, we know we need to be highly targeted when working with a community to ensure customers identify with the messages that we are using. We are currently developing our prototype data dashboard that uses affordability modelling by BRG on the expected demand for water affordability support at a community level and then overlaying 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 greater level of training and experience. When they are not resolving issues reactively the Reps are proactively engaging customers that need extra support. They do this through attending local community meetings and building networks with carers and advice providers. On average the team of Reps deliver 10 community engagements a month and create 1k PSR registrations a year from underrepresented groups in our communities. Rob is one of our team and appears in Figure 15.

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 people 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, make applications for them and refer to the hardship trust fund for white goods, '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

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 16.

As this approach is inefficient in engaging customers, we will deploy it after marketing and data sharing approaches have been utilised. Reviewing our data model will tell us where to target, starting at Local Authority level and then down to Lower Layer Super Output Areas, with what proposition to target.

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 highlights Enfield, Croydon and Newham are the areas that 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 54,000.

Figure 16: Our community engagement approach

We 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 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 to open doors for us 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 us.

Types of key trusted partners to achieve this targeted community reach are described in Table 10.

Table 10: Organisations we have been engaging to develop our community campaigns approach

Organisation	Collaboration Opportunity
Interfaith network Promotes understanding cooperations 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	Communities that are religiously and ethnically diverse, build relationships and trust and collaborate on initiatives that benefit the community

collaborate on initiatives that improve the community they live in	
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.
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.

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

One of the most important initiatives in 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 yearly and 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.

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 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 more people are getting involved and playing their part in spotting signs of vulnerability or ways they can change their own work practices.

6.6 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 to do this. We invite them to a biannual webinar to update them on our extra support services and creating 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.

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 18: Thames Water team members at the Sikh Gurdwara in Slough with our literature translated into Punjabi, alongside SSEN
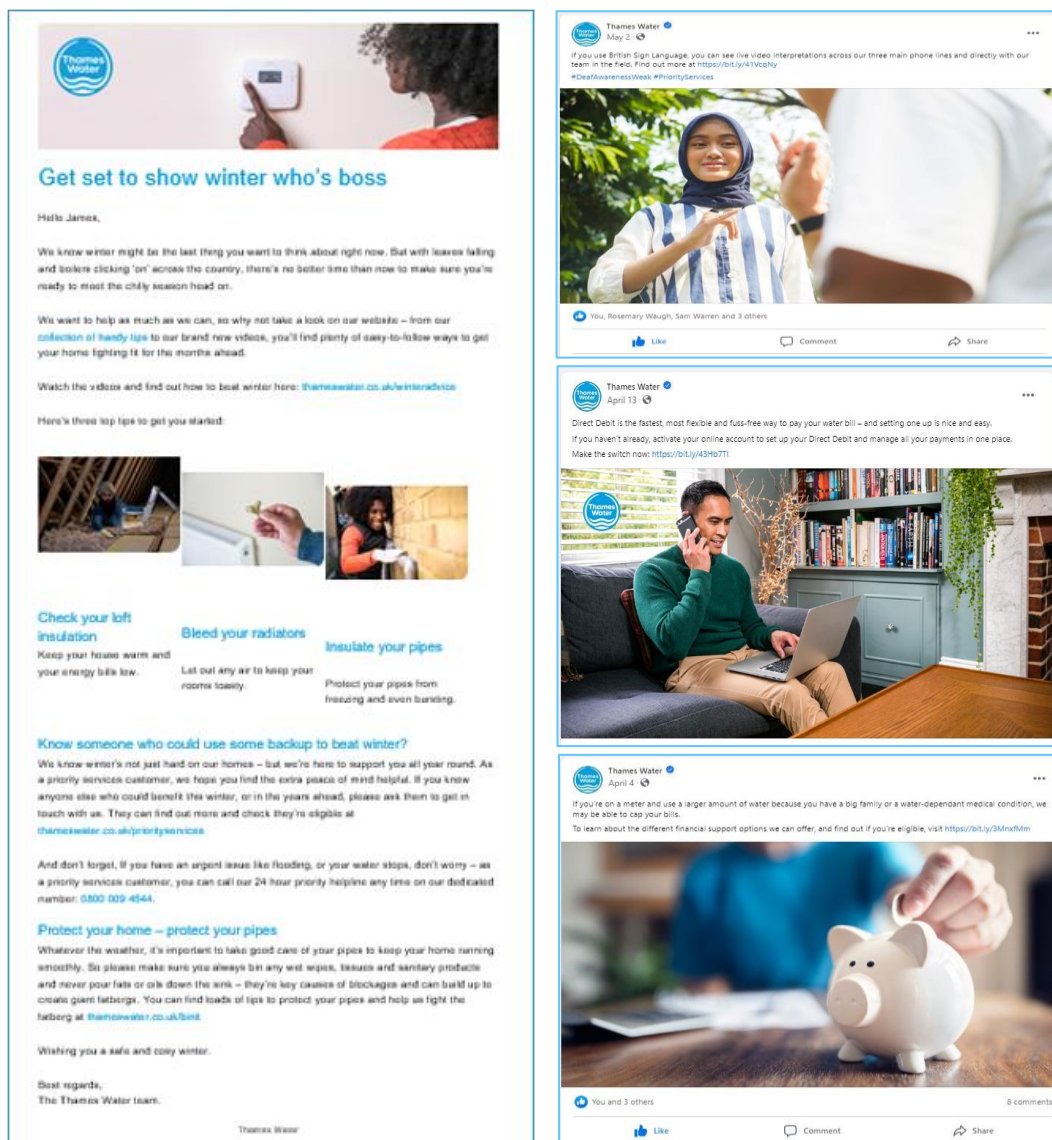

6.7 Marketing campaigns - 2020-2025 case studies and 2025-2030 approach

Three approaches are used to increase awareness of our services through marketing: we run social campaigns, add vulnerability messaging to our brand campaigns and run targeted PSR email comms to key geographical groups.

With our social campaigns, we aim to post at least twice a month on our support services to ensure we have a regular cadence of comms across Facebook and X (Formerly Twitter). On average we achieve a 3.3% engagement rate on Facebook against a benchmark of 2.8% and a 2.8% engagement rate on X against a benchmark of 0.8%, showing that our support services are valued. In terms of our brand campaigns in winter and summer these include our extra support services as shown. These reach around 1.5 million customers with a 'click through rate' of 0.5%. Examples of these communications are shown in Figure 19.

Lastly, we undertake targeted email campaigns to raise awareness. For example, targeting PSR awareness to over 65-year-olds. These have a smaller reach but a higher 'click through rate' of 5% due to the targeted nature of messaging for the audience.

Figure 19. Examples of social media messaging raising awareness of our services.

6.8 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 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, over social media, posters in their high street charity shops and in the press. This included two videos featuring Sense clients advocating registering for Priority Services.

'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%[48] higher than the three months prior, with around 1,000 customers registering per month.

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

> **"It's a comfort to know that it's there and it takes away a bit of the worry."**
>
> Our free priority services look after you if you need an extra helping hand. We'll tailor our communications to suit your needs and offer dedicated support if your water stops flowing.
>
> To find out if you're eligible go to thameswater.co.uk/priority

Figure 20: Our partnership with Sense

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.

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7. Delivering our strategy

To deliver our stretching vulnerability strategy funding will be made to support those initiatives that have the largest 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 Customer Service Committee, which includes 3 board members and meets every 6 months, has oversight of our strategy to monitor its effectiveness.

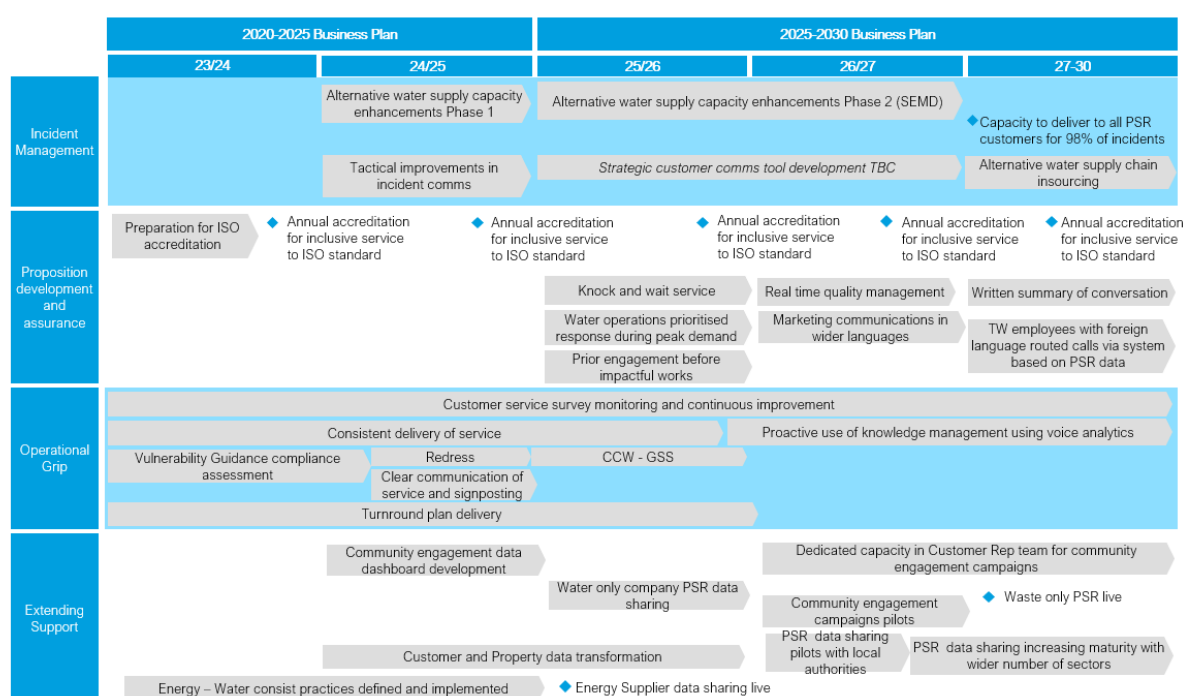[48] Thames Water analysis

7.1 Delivery programme

Figure 21 describes the high-level delivery plan for inclusive proposals described in section 5. While we continue to focus on our turnaround plan, we are carefully phasing investment across our business to create balanced outcomes. This strategy has dependencies on three strategic platforms delivered through digital CapEx – 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 CapEx creates dependencies for this strategy.

Improvements to inclusive service in 2020-2025 focus on the delivery of alternative water supply capability. 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.

We will continue to take our leading role influencing PSR data sharing and influence industry direction to create a sharing mechanism that sectors outside of water and energy can join. The Master Data Management Strategy enablers will ensure efficient matching of customer and property data for both 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 2025 and once optimised additional team members will be recruited to increase capacity for this way of working.

Figure 21: Inclusive service short term and medium term delivery plan[49]

[49] Thames Water analysis

7.2 How do we know our strategy is successful?

Table 11 describes the measures we will use to monitor the effectiveness of our strategy and ensure we are on track to meet our targets. While these metrics will evolve, this table summarises the measures, our current state and aspiration for 2030.

Table 11: Measures to monitor the success of our strategy.

Dimension	Metric at 22/23	2030 target	Rationale for this metric and notes
Service survey score - % of PSR customers satisfied relative to non PSR customers	+1%	>1%	A negative score will represent inclusive service issues requiring intervention.
Service survey score - Incident management	Tbc dependant on Ofwat C-MEX work	tbc	How well we responded and supported PSR customers during an incident[50]
Employee pride in service delivery for those needing extra help[51]	76%	80%	Our employees will only score this highly if they believe they are meeting the needs of customers. Teams with high scores represent areas of strength (Retail, Extra Care: 94%) and weakness (Operations, Incident support: 29%)
Proportion of eligible customers on PSR	26%	75%	Our ability to extend the reach of our PSR support
Representation of support: Reduce difference between upper and lower levels of support reach by community	tbc	tbc	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 least one service proposition for either affordability or inclusive service	78%[52]	80%	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. Note: includes payment plans and direct debit

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[50] To be included when Ofwat C-MEX methodology has been agreed
[51] This metric will not be available in 2024 as we prioritise our investment in essential areas, but hope to reintroduce this survey after delivery of our Turn Around Plan
[52] Thames Water analysis

PSR attempted / actual contact with customers on PSR > 2 years	90% / 47%	90% / 45%	Represents our efforts to maintain accurate data
Inclusive service accreditation status	Maintain	Maintain	Overall external assurance of our inclusive service approach, currently audited by external party
Number of tailored propositions	23 propositions	30 propositions	30% increase in tailored propositions
Vulnerability Guidance alignment	95%	100%	Represents our efforts to maintain compliance with vulnerability guidance
Bottled water deliveries	Tbc	Tbc	How well are we keeping our promises to deliver bottled water to customers during an incident

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	• We have 23 propositions for supporting customer (See table 5) • 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 5.2) • 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 5.2) • 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 6.4) • 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 • We provide PSR customers with a dedicated phone line for operational issues, PSR	• PSR customer satisfaction is greater than, or equal to, non PSR customers. 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 - this is relevant to around 4% of incidents over the year.	• By 2030 PSR customer satisfaction is the same or higher than non PSR customer satisfaction • By 2030 we will increase in tailored propositions by 30% • Maintain our ISO standard accreditation • Incident management CSAT tbc

| | | | 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 5.2](#))
• 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 5.2](#))
• We have worked in partnership with Plain Numbers as part of our bill redesign to simplify the presentation of numerical information ([See section 5.2](#))
• 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.
• 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.

To improve our service we will:
• Significantly increase field resources to provide alternative water during a supply interruption (See section 5.3)
• Prioritise the resolution of water service issues for PSR customers during peaks in demand (See section 5.3)
• Signpost customers to telecoms PSR on our website and update our PSR Welcome letter to provide details of our financial support (See section 5.3)
• 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 5.4)
• Improve our incident communications (See section 5.3)

1.2	Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.	Non compliant	• 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 5.2) To achieve compliance, we will: • Make it easy for customers to seek redress if they are not satisfied with the provision of extra help they received (See section 5.3) • Provide tailored information when customers join our PSR to help them understand the services they can expect to receive (See section 5.3)	• PSR customer satisfaction is greater than, or equal to, non PSR customers. A lower than baseline score will represent inclusive service issues requiring intervention. • Inclusive service accreditation status	• Measuring the provision of inclusive services is complex and often subjective.	• By 2030 PSR customer satisfaction is the same or higher than non PSR customer satisfaction • 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	• 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	• PSR customer satisfaction is greater than, or equal to, non PSR customers. 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	• Prioritisation of digital capex to create a new strategic platform to enhance customer communications during incidents.	• By 2030 PSR customer satisfaction is the same or higher than non PSR customer satisfaction • Maintain our ISO standard accreditation • By 2030 we will increase in tailored propositions by 30%

			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.		
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	• 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 be are delivering our services and where to focus on making improvements • See table 11 for detail of how we plan to monitor the effectiveness of our strategy	• PSR customer satisfaction is greater than, or equal to, non PSR customers. 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	• By 2030 PSR customer satisfaction is the same or higher than 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	Compliant	• We have been accredited with BSI 18477 and then ISO 22458 for the provision of inclusive service for four successive years (See section 5.1) • 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 13) which is a included annual engagement with	• 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.	• Maintain our ISO standard accreditation • Representation of support: Reduce difference between upper and lower levels of support reach

	be underpinned by relevant insights, which may include research, engagement and accreditation.		30 organisations that advocate for customers in specific circumstances (See section 6.1). While we will not continue our annual panel, as the pace of change has slowed and we are mindful 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. • 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	Range of take up by compared to modelled need by community (Local Authority / MLSOA) will narrow over time.		by community target tbc
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	• We offer arrange of inclusive communication channels to help customers communicate with us, including email, post, phone, webchat and video call (See table 5) • 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 • 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	• PSR customer satisfaction is greater than, or equal to, non PSR customers. A lower than baseline score will represent inclusive service issues requiring intervention. • Number of tailored propositions • Inclusive service accreditation status		• By 2030 PSR customer satisfaction is the same or higher than non PSR customer satisfaction • By 2030 we will increase in tailored propositions by 30% • Maintain our ISO standard accreditation

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	• 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 6.1)	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	To grow and maintain our PSR we: • 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 6) •Leverage the data we have, or can access from partners or open sources, to proactively register, refer or signpost customers for support (See section 6) •Deliver campaigns to increase awareness, in particular communities that are underrepresented to allow services to be extended to them (See section 6.7 and section 6.8)	• 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	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 average. With nearly half of all	• Extend the reach of our PSR to 75% of eligible households, with 1.2 million customers by 2030 and 90% of eligible households by 2035 • Representation of support: Reduce difference

				(Local Authority / MLSOA) will narrow over time. • 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.	properties in London being rented transience presents us with a unique set of challenges in building our PSR and maintaining it.	between upper and lower levels of support reach by community target tbc • 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	• Our approach to extending the reach and awareness of our services focusses on data sharing (See section 6.3) 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 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	• 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.	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 Londoners identifying as 'white British' is less than half of every other region in the UK. This presents us	• Extend the reach of our PSR to 75% 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

			work with the Energy sector. We have also been engaging cultural groups to develop our community campaigns approach (See section 6.3 and section 6.4)	• 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. Note: includes payment plans and direct debit	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.	by community target tbc • 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 for extra help, even when a customer has not	Compliant	• Our customer facing teams undergo vulnerability spotting training and all our employees receive yearly vulnerability e-learning refreshers (co -designed with Money Advice Trust) (See section 6.5) We see thousands of customers per month join our PSR through this route.	• 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		• Extend the reach of our PSR to 75% of eligible households, with 1.2 million customers by 2030 and 90% of eligible households by 2035 • Representation of support:

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	previously declared it.				compared to modelled need by community (Local Authority / MLSOA) will narrow over time.		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	• 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 6.3) • 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,	• 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 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	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 focus on supporting industry efforts to create	• Extend the reach of our PSR to 75% 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 • By 2030 80% of customers surveyed will be aware of at least one service

			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.	efforts to allow customers to make informed choices about available support. Note: includes payment plans and direct debit	consistent ways of working that are scalable to work with the Energy sector.	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	• 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.	• PSR attempted / actual contact with customers on PSR > 2 years. Represents our efforts to maintain accurate data • Our Data Protection Committee monitor our date protection compliance performance		By 2030 we will attempt to contact 90% of customers on our PSR and make contact with 45% of PSR customers
4.2	Companies' records should be reviewed regularly to ensure they are up to date.	Compliant	• We use employee spotting, signposting and referrals to grow and maintain our PSR (See section 6.5) • 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 5.1)	PSR attempted / actual contact with customers on PSR > 2 years. 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

			• Customer can also update their details on our portal at any time or call in to our contact centre (See section 5.2)			
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	• 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 5.2) • 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 5.2) • 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 5.1)	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 focus on supporting industry efforts to create consistent ways of working that are scalable to	We will continue to attempt to contact 90% of customers on our PSR and make contact with 45% of PSR customers

					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 how their customers who need extra help feel about	Compliant	• 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 6.3)	PSR customer satisfaction is greater than non PSR customers. A negative score will represent inclusive service issues requiring intervention		By 2030 PSR customer satisfaction is the same or higher than non PSR customer satisfaction

	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	To achieve compliance, we have: • published this vulnerability strategy and will publish an update to our vulnerability strategy in 2025 • published this table setting out how we meet the guidance and our improvement plans • assessed our compliance with the Service for All Vulnerability Guidance and built into our plan actions to fill gaps	• Draft and final Vulnerability Strategy published on our website • Monitor compliance with Ofwat guidance		• Vulnerability Strategy published by 30 June 2024 and updated Vulnerability Strategy published by 30 June 2025 • 100% alignment with vulnerability guidance minimum expectations by March 2025
5.2	Companies should take steps to understand the likely underlying requirements for extra help in their areas.	Compliant	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 4.2)	Draft and final Vulnerability Strategy published on our website		Draft Vulnerability Strategy published by 30 June 2024 and Final Vulnerability Strategy published by 30 June 2025

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