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Foreword

I am pleased to introduce our updated vulnerability strategy, which outlines our plans and initiatives to support customers who need extra help.



We already provide extensive support to customers in our community who need extra help, whether the need is temporary, permanent or changes over time. We work closely with a wide variety of local stakeholders, community groups and charitable partners.

We reach out to customers by sponsoring and attending community events and having a Trusted Partnership approach. Our team of Extra Care colleagues and 'Here for You' officers provide support and home visits when extra help is needed.

Our customer strategy is based on getting things right first time, providing a high level of service for all customers. We have dedicated policies, financial or otherwise, to ensure customers in need get the right support for their circumstances and stage of life. We aim to be easy to deal with and we regularly remind customers of the support that is available.

However, we're always looking for ways to improve and we welcome the chance to reflect on the support we offer to make sure we're living up to our strategy of being: 'Here for you, support when you need it'.

In this document, we share the existing support on offer and our plans to improve this support until to 2030. This will ensure our strategy reflects and adapts to the ever-changing needs of the community we serve, and the particular needs of our customers.

We welcome any feedback and look forward to further extending our awareness, empathy and support for customers who need extra help. This will be demonstrated through the culture of our entire organisation, as well as our everyday actions.

Ketan Hindocha Customer Director Pennon Group Plc

Executive summary

Our Addressing Affordability and Delivering for Customers strategy sets out our vision of how we will provide an excellent customer experience and rebuild trust with our customers and communities. Our plans will improve our customer satisfaction scores by providing a tailored and efficient customer experience and delivering on the priorities and expectations our customers have shared through our extensive engagement and research work.

To deliver this experience, we need to consider and understand the customers in our region, their individual needs and expectations. This is especially important for those customers who need additional support, both financial and/or due to other vulnerabilities. As the only provider of water and wastewater services to our household customers, we recognise how critical it is to ensure that every customer can understand, access, and receive the help from us that they need. We also recognise that there are many forms of vulnerability, and work within the definition of vulnerability set out by Ofwat:

'A customer who due to personal characteristics, their overall life situation or due to broader market and economic factors, is not having reasonable opportunity to access and receive an inclusive service, which may have a detrimental impact on their health, wellbeing or finances.'1

Our research has shown that supporting all our customers dependent on their need and the impact on the service provided is an important consideration for customers. Frontier Economics, in their synthesis of our research work, highlighted that 'Customers would like to see most support given to those with a medical dependency on water, those on low incomes with chronic illnesses or disabilities and pensioners on state pensions with no other sources of income'.2

This document sets out our strategy to deliver an outstanding service for all customers, but in particular, those who may need additional support from us. We address our strategy to support those with financial vulnerabilities, and our strategy to support those needs resulting from other forms of vulnerability, while recognising many customers may fall into both categories.

We have developed this strategy with an aim to achieve best practice standards across the range of services we provide, as well as incorporating the regulatory expectations set out in the Ofwat Paying Fair

Guidelines³ and the and the Service for all guidance published by Ofwat in December 2023 which now also incorporates the Priority Services Register standards 2025.4 This strategy was first published in October 2023, and refreshed in May 2024 following the publication and implementation of Ofwat's Customer Focused License Condition.⁵ This is our final strategy, published in June 2025.

We will ask for feedback on this strategy annually from our stakeholders and our customers. We will also ensure our WaterShare+ panel and our board review each year and feed in any recommendations.

Our customers

To provide the best possible support, we need to truly understand our customers. In this section, we set out analysis and insight that shows where we have aboveaverage levels of customers who are likely to have additional service needs. We know from our work with the Local Insight Tool that our customers are more likely than those across the rest of England to be:

- Elderly
- Digitally disadvantaged
- To live in a rural community that may mean it is more difficult to access amenities and services
- On lower incomes.

We build these factors into our strategy, to ensure we are focusing on those areas that have higher levels of need. However, we also know that those that have particularly acute needs, for example driven by medical dependency on water, must also be a high priority, even if these customers may be relatively low in numbers. As such, our strategy also highlights these groups, to ensure we provide those most vulnerable with a supportive, responsive and tailored service.

Draft Vulnerability Guidance Ofwat

Frontier Economics, Research Synthesis 20 August 23

Paying Fair Guidelines to support customers

Service for all – Ofwat's draft vulnerability guidance for water companies,

supporting customers who need extra help - Ofwat ⁵ Customer Focussed Licence Condition - Ofwat

Our strategy to support those with financial vulnerabilities

In a time of challenging macro-economic circumstances, financial vulnerability is perhaps the most common vulnerability. Financial challenges often come with other pressures that can lead to further negative impacts on health and wellbeing, for example housing insecurity, ill health or relationship issues.

With this in mind and given that our region suffers from particularly acute financial pressures, we are committing to retain our industry-leading position in affordability and vulnerability, as well as our ambition to eradicate Water Poverty. The Index of Multiple Deprivation indicated in 2019 that Cornwall, parts of Devon and Bristol had some of the highest levels of deprivation in the country, taking into account income, employment, education and training, and health, amongst other factors. We know that households in Devon and Cornwall have incomes of 7.56% below England's average, while Bournemouth and Bristol regions are in line with the average.

The city of Bristol continues to have deprivation hot spots that are among some of the most deprived in the country⁶, yet adjacent to some of least deprived.

Supporting those who are struggling to pay their water bill or need support to stay out of Water Poverty is fundamental to providing inclusive services. available to all.

Our detailed work, modelling Water Poverty across our region using forecast data until 2030, sees more unmeasured customers in particular coming into Water Poverty as charges increase from 2025. 'In combination with rising housing costs and incomes that are predicted to continue rising below the inflation rate, this makes it harder for us to achieve our Water Poverty eradication goal. We have developed a glidepath and toolkit which will allow us to ensure all customers at risk of being in Water Poverty, will receive the right level of support by 2030, in line with CCW's target.

This will also target re-establishing our 2025 position, where we remain on track to support all those customers in Water Poverty by this date. Our approach to affordability will build on our current affordability toolkit. and will focus on:

- Firstly, and fundamentally, ensuring affordable bills for all customers; we do this by balancing investment priorities with bill impacts, driving efficiency to deliver value for money and ensuring our plans deliver key customer priorities and the statutory improvements needed now, while ensuring we are fairly balancing the impact on current and future customers
- Starting to roll out upgraded meters, empowering customers to use only the water they need, keeping bills low and reducing consumption
- Using progressive charging to ensure we are reflecting costs fairly across our customer base, a particular focus on our areas where we have high investment needs across our beaches and bathing waters, and our water resources need to meet the needs not only of our resident population but also the visitors who travel to the South West over the summer months
- Offering metered supply to unmeasured customers; this will ensure that we are providing the right tariff to the right customers and supporting them with water efficiency measures to enable the lower consumption for those customers
- Proactively identifying and enrolling those at risk of Water Poverty onto our support tariffs, making support easy and ensuring we treat customers with respect and empathy
- Refresh our customer promise, across all of our brands to include a clear compensation policy that would apply if we do not meet promises to customers who need additional care
- Growing our data shares for customers who may need financial support, like those we have in place with local councils.



⁶ bristol.gov.uk/files/documents/1905-deprivation-in-bristol-2019/file The 10 most deprived neighbourhoods, same as identified in 2015.

Our strategy to support those with non-financial vulnerabilities

However, not all customers are vulnerable due to financial circumstances, and our strategy also sets out how we will support these customers. This strategy will set out our ambitions in this area and ensure we follow best practice as set out in the BSI standard on inclusive services, for which we hold Kitemark accreditation. It will also ensure we comply with the Service for All guidance published in December 2023 (incorporating the Priority services registers standards 2025) and the new requirements of the Customer Focused Licence condition.

The first step in providing the right services is to identify those who may need additional support. As such, we expect to see a significant growth in the number of households registered with us on priority 24% by 2030, allowing us to understand the needs of our customers and ensure we provide tailored. relevant services to those who need them.

We are expecting to reach 24%, as we know from our customer segmentation data that 35% of our population is vulnerable⁷ (this contains factors of over retirement age, financially struggling to pay their bill and disability/health). We anticipate that not all of these customers will need to be on the Priority Services, we have therefore set the target under this level, increasing at the average rate we have seen since 2020, and in line with our checks on the data we have received via our data shares.

We know, from our data led approach that in our region we are likely to have:

- Higher levels of rural communities, which makes access to bottled water, for example, from distribution points potentially challenging
- Higher numbers of elderly customers, who may need help with large print bills, or may be in poorer health
- Higher numbers of customers who are digitally disadvantaged; and therefore we need to consider this in our communication strategy.

Having increased the number of customers we have identified and recorded as needing additional support. we need to deliver on the needs and expectations of these customers, as well as ensuring we continue to check and update the needs of those customers as we progress. In doing so, we will consider:

- Accessibility and communication channels for example, providing braille bills, translation of bills into other languages, and an accessible website for all customers
- Support during supply interruptions prioritising those with the greatest medical need, such as those with medical dependency on water, or in rural conditions, the need to deliver higher levels of bottled water to individual households, rather than through distribution points
- Ensure we have excellent digital journeys, but also retain empathetic, 'warm voice' contact channels, such as telephone
- Training our staff to ensure they are alert for customers who may need support, and that they provide a safe and reassuring presence, for example, when attending customer homes to resolve operational issues
- Giving greater focus to the communication of the services we provide to those with specific needs, increasing awareness which we recognise to be lower than we would like.

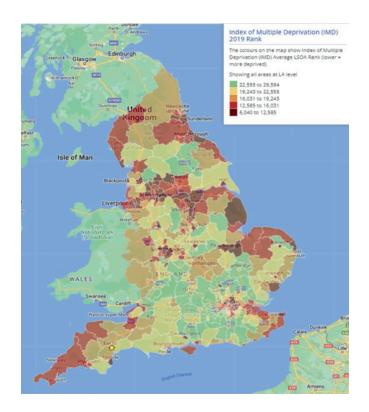
⁷ South West Water PR24 Sampling strategy June 2023 ICS

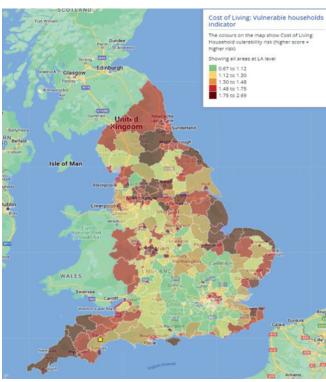
Executive summary continued

A key purpose of our customer vision for 2025-2030 is to rebuild trust with our customers. Providing a tailored service is important, we know it will help make the service better and more efficient for our business. Providing the extra care for those customers who need it is a core pillar in this strategy and will allow us to communicate and engage with these customers through the right channels and provide them the empathetic, relevant service they expect.

We know from our ongoing, business as usual feedback and research that customers want more information about what we are doing, how we are improving and investing in services, and ensuring they understand our plans. We will reflect the attributes of our customer base in our engagement plan, ensuring we engage not only through digital channels, but also through print media, local news, and community outreach programmes to ensure we reach and engage with all our customers.

Household incomes in Devon and Cornwall are 9.67% below England's average





Understanding our customers

Our summary

What does vulnerability look like in our region? To help us understand the demographics of our region, we use a tool developed by Oxford Consultants for Social Inclusion, called Local Insight. This provides an understanding of the help our customers need from us, from a region level, and through to a small community level. We have used it to compare to the national trends as well, to see how we are different to other areas. We have considered this in ensuring our strategy meets the needs of our population, especially when they need additional support.

This data-driven analysis will help us understand our customer segments and analysis across our region. However, we are also aware that some of our most vulnerable may not be apparent in this analysis, but still require support.

Chart

What this means for our customers

Our promise

Rural Communities



- Our region serves many rural communities
- For England as a whole, travel time to the nearest town centre by foot or public transport is 21 minutes, for our region this is 22.5 minutes. It is more noticeable in Devon and Cornwall. at 24.5 minutes8
- Our Bournemouth and Bristol regions are in line with England's average, but our communities in Devon and Cornwall are more rural
- Therefore, during even a few hours water outage, we need to be mindful that our customers (especially in rural parts of Devon and Cornwall) may not be able to easily collect bottled water
- For our customers who have registered with us on our Priority Service Register as they need bottled water during an outage, it is very important we provide a good level of customer service. We need to ensure we have the resource to deliver the water to the rural communities

- Support during supply interruptions
- We will grow our PSR to 24% as knowing who needs the help, makes it easier for us to service them right first time
- We will therefore ensure clear prioritisation and segmentation on our Priority Services Register
- We will prioritise delivering bottled water to those with the greatest needs, such as those with medical dependency on water
- We will prioritise helping customers in rural communities, with bottled water to individual households, rather than through distribution points.

Digitally Excluded Customers



- When we compare our service area to the England average using the Digital Exclusion Risk Index (DERI score), England's DERI score is 3, we are 3.19
- We have striking differences across our service areas
- South West Water scores 3.3 in this metric, 10% higher than England as a whole
- The Digital Exclusion Risk Index (DERI) explores the risk of digital exclusion for an area. The score is based on three parts: age, broadband accessibility and deprivation. A higher score indicates a higher risk of digital exclusion.
- We will build our communication plans to ensure we take a multi-channel approach, using traditional and digital channels
- We will use data to better understand our hotspots of digitally excluded customers, and ensure we are robustly and efficiently meeting their needs, for example through community events and printed rather than digital communication about the topics that are a priority to them
- We will work with partners to maximise our reach and impact.

Aging Population



Customer **Providing Care**



- We have a higher percentage of customers who are 65+ than other regions¹⁰
- This is a need code on the PSR, and is a contributory factor to our commitment to grow our Priority Services Register (PSR) to 24%
- Customers who are over 65 do not always require additional support, however there is a likelihood of other support needs such as being medically dependent, digitally excluded or needing financial support
- \bullet We are aware of the strong links between the ageing population and the population that provide unpaid care. This is especially apparent for our customers in the Devon and Cornwall region who are above the England average for providing over 50 hours a week of unpaid care1
- Bournemouth Water and Bristol Water areas are in line with England's average.

- We will ensure we offer inclusive support services to those in this category, targeting them through the use of data and support
- We will work with our partners such as AgeUK to ensure we increase awareness of inclusive services with the customer segment
- We will train our staff to identify and position support with older customers
- As this is retirement age, we would expect these customers to be at home more, this could increase water usage. Therefore, we will ensure our water efficiency messaging is targeted at this group
- We will ensure we provide messaging on our support tariffs, especially if water use is higher than average.

⁸ Government Department for Transport Journey time statistics, 2021-

⁹ Greater Manchester Office of Data Analytics, 2021 –

¹⁰ Census, 2021 -

¹¹Census, 2021 -

Understanding our customers continued

Chart

What this means for our customers

Our promise

Financial Vulnerability



- Customers in the South West Water region are more financially vulnerable compared to the rest of England¹²
- This is a score determining the relative risk of households falling below an acceptable standard of living as a result of rising costs with the cost of living
- Water debt is frequently not regarded as a priority debt. We see from this data that the regions we serve have relatively high levels of average debt (2nd highest in the UK) and priority debt
- This means for our customers in debt, on average 49% of their debts are priority debts and they will be likely to focus on paying them over their water debt.
- Financial vulnerability is a key focus of our plan
- We set out our approach to affordability and non-financial vulnerability in section two and three of this report
- We use customer segmentation to inform our approach, which uses:
 - Fair charging
 - Water efficiency support
 - Upgraded meters
- · Support for these who need it
- We will continue to work with our partners in the debt sector to ensure that water debt in the areas we serve is treated as a

Disabled Population



- The Disabled Population is any person, classified as disabled under the Equality Act, whose day-to-day activities are limited a lot due to their circumstances
- Census 2021 data shows the South West Water region is higher than the England average¹³, for the number of residents living with long term illness. Our other regions are below that average
- Both of these factors will increase the number of South West Water customers who are likely to need to be registered on the PSR and require additional care from us with their water and waste service.
- We will work with disability partners to promote the services we offer.

Dementia Population



- This is a key focus in our Bournemouth Water area with 1.20%14 Dementia Prevalence compared to the England average of 0.80%
- Our customers require our staff to be trained to help service their needs.
- We will expand our training to continue to be a Dementia Friendly Organisation. Our customer service staff already receive vulnerability including a specific Dementia Friends virtual training session
- We work closely with Exeter Dementia Action Alliance who offer enhanced Dementia sessions. During 2022-23, a total of 93 employees from across the business have attended the Dementia Friends sessions delivered by Gina Award from Exeter Dementia Action Alliance, key comments following attending a Dementia Friends sessions:
- "I didn't realise dementia can affect younger people, I thought it was just older people"
- "Dementia is an umbrella term for many different types".

Average Income



- The net annual household income estimate after housing cost is much lower in the South West region than the England average at £26113.715 in the South West compared to £28,248 in England
- In addition the population claiming working benefits is lower than average despite residents also experiencing lower than average income levels
- This could mean our customers are missing out on benefits they are eligible for, Policy in Practice estimate that each year £19 billion of support goes unclaimed.
- We will use all of our affordability toolkit to help our customers lower their water bill
- We will auto enrol our customers onto a discount tariff to remove them from Water Poverty.

No Working Qualifications



- All our regions have a lower than England average of working age adults with no qualifications. While it is a positive that our customers are more likely to have a qualification compared to the England average, there is still a proportion of our customers that may require extra support.
- We will visit communities that have a greater than average customer base with no qualifications. We will go to our communities to provide face to face help with their billing and service needs.



- All of our regions have a lower than England average of households where not all residents speak English as their main language, this is from Census 202116. While this isn't a large proportion of our customers, this is group of customers who require our support.
- We will continue to provide braille bills, translation of bills into other languages, and an accessible website for all customers
- We will grow partnerships, as we have with the Bristol Somali Resource Centre, to provide accessible information to communities where English is not the first language.

¹² Loughborough University/Joseph Rowntree Foundation Minimum Income Standard (MIS), 2021 –

¹³ Census, 2021 -

¹⁴UK Parliament House of Commons Library Constituency data: health conditions, 2021 –

¹⁵ DWP. 2022

¹⁶ Census, 2021 -

Our strategy for non-financial vulnerability

Understanding how to support customers who need extra help

Providing an effortless customer experience and tailored care to our customers who need it the most is vitally important to us. As the only provider of a critical service for our region, we appreciate the responsibility of understanding which customers need additional support, and making sure that we have efficient processes in place to deliver on the service we have promised.

This section also addresses how we will comply with the Service for all guidance which was published in December 2023, one of the new requirements of the Customer Focused Licence condition and also the Priority Services Register standards published in April 2025.

Accessibility and communication channels	We will continue to provide braille bills, translation of bills into other languages, an accessible website for all customers.
Support during supply interruptions	We will ensure we prioritise those with the greatest medical need, such as those with medical dependency on water, or in rural conditions, the need to deliver higher levels of bottled water to individual households, rather than through distribution points.
Improved customer journeys	We will ensure that we have excellent, fully accessible, omnichannel journeys which include digital journeys, but also retain empathetic, 'warm voice' contact channels, such as telephone, so our customers can switch and choose those most suitable for them.
Robust staff training, policies and customer promises	We will continue employee support programmes and incident management training to look after customers.
Giving greater focus to the communication of the services we provide to those with specific needs, increasing awareness which we recognise to be lower than we would like	We will continue to use our partners, paid ads on social media, newsletters and continue to look at and refresh all customer communications. We will also use our continual insight to test the effectiveness of our communications up to 2030.

A key purpose of our customer vision for 2025-30 is to rebuild trust with our customers. Providing a tailored service is important, we know it will help make the service better and more efficient for our business. Providing the extra care for those customers who need it is a core pillar in this strategy and will allow us to communicate and engage with these customers through the right channels and provide them the empathetic, relevant service they expect.

BSI inclusive service provision

To ensure that we are providing our best customer experience for our customers who need additional care, we have committed to being assessed on our strategy, training, and service to achieve and maintain accreditation from BSI on an annual basis.

BSI has created a Kitemark scheme, formulated using the best practice and the requirements of some of the UK's leading regulatory bodies, Ofgem, Ofwat and FCA with nine cross sector organisations having achieved the certification.

Since publishing our plan in October 2023, we have been certified with the new BS ISO 22458 for inclusive service provision, which also includes the Kitemark standard.

This accreditation underpins our strategy for helping customers who need additional support and accessible services.

Key changes we have made include:

- Fully accessible websites which included moving to new web platforms
- Robust and measurable training for our staff on our polices and service, available 24/7 for all our teams including their mobile devices for quick on the go
- Introduction of vulnerability heroes, our subject matter experts across the business
- Imbedding an inclusive culture
- Enhancing customer journeys and processes to have vulnerability front of mind
- Innovations to how we work including data sharing and being proactive with vulnerable cohorts
- Enhanced partnership working
- Better digital self service options
- Services to help make us inclusive, such as, Relay UK, Language Line and Sign Live
- System improvements to allow our field teams to have awareness of customers' extra support needs.



The Bristol Water BSI auditor commented:

"Bristol Water and their collaborative billing partner Pelican, have both demonstrated a high level of conformity against both the standard and Kitemark requirements, with positive recommendation for certification being made, subject to the receipt and acceptance of an appropriate corrective action plan¹⁷."

The Vulnerability Strategy is evidenced as being clear, well communicated and understood by all parties, with planning to achieve demonstrated as being planned and effectively delivered.

Outputs are analysed at all levels to gain improvements with clear vision and drive fuelling continual improvement by all parties.

Worthy of particular note are the efforts made by the business to reach out to society in order to learn about lesser-known vulnerabilities and harder to reach cohorts with the aim to improve lives and prevent harm. A great deal of empathy and understanding was shown by all personnel that engaged with the process - cultural values are clearly well embedded and delivered."

What our customer research tells us

As part of our ongoing customer research we have tested our strategy with our customers and stakeholders to ensure it meets their needs.

During February 2024 we held workshops with our debt advice partners, part of the session was dedicated to our strategy. They suggested a shorter, more targeted document. We have listened to this feedback and have supplemented our main strategy with a condensed customer 'easy guide' document which we will review each year alongside our main strategy document.

Scope, the disability equality charity in England and Wales that supports and advocates for disabled customers, have independently reviewed our strategy. Although not a formal review, they have commented 'there are some really good content in here, a mix

of progress to date, plans for the future and case studies, although it's very long!' This mirrored the feedback from debt advice and strengthened our view of the need for a customer friendly version of our strategy. Scope, amongst others, have suggested improvements we have noted, they also stressed the need for us to ensure any strategy document was tested for accessibility.

Customer feedback is very important to us and allows us to inform our strategy in the strongest way possible. We have asked our customers to review our strategy and their feedback has had a strong focus on the following six needs and forms a key part to our forward plans.

available and we will ensure our websites give as

much clear information as possible.

11004	What are we doing.
A contactable company – Able to readily reach us, with telephone contact preferred when requests are urgent or important.	We pride ourselves on having a wide range of ways customers can contact us including telephone, email, letter, web chat, web forms, WhatsApp, and social media. We will continue to offer as many communication channels of customers choice as possible.
Staff who are approachable and well-educated – An awareness of health conditions and can show empathy in understanding why these could mean someone requires additional support.	We will continue to grow our stakeholder portfolio, so we have as many diverse organisations as possible helping us understand customer support needs and ensure our staff are trained to a high standard.
Proactive communications about services – Be told in a user-friendly and obvious way about the support on offer.	We always try and highlight ways we can support our customers via bills, newsletters, social media and community events. We will continue to do this and look for more innovative ways we can reach our customers.
Clear eligibility signposting – Accessible information that clearly highlights and explains which services apply to certain customers.	We recognise we can do more with our priority services customers, so they know what services they are eligible for. We will ensure this gets rectified. Our bills already give a clear picture of what support is

What are we doing?

Need

Easy to sign up – Streamlined support sign-up, with shorter and simpler forms that make this less burdensome on customers.

Emergency support – Bottled water to all when an incident lasts longer than a few hours, plus accurate and timely communications during the event to help customers determine whether they seek other avenues of support (e.g. staying with friends/family). Texts are best as they are immediate, and people often have their phone to hand.

We know we can do more in this area and we will look to streamline more processes to ensure we reduce customer effort.

We have robust incident management processes in place which includes communicating with customers in a range of ways. Our aim is to resolve incidents as quickly as possible and restore services back to our customers. We have in-depth incident website pages detailing our journey with customers in mind. We always survey customers after an incident so we can use their feedback to find ways to improve.

We regularly survey a sample of customers who are registered on our Priority Services Register (PSR), asking about their satisfaction with the service we provide. We capture customer satisfaction across all aspects of our business including after any customer complaints, and as part of our post incident events. As well as after each interaction with have with our customers. Across all of our regions, we have already registered more customers onto our Priority Services Register than the 2025 target.

For South West Water and Bournemouth Water customers, we measure the satisfaction of those on PSR who have received a service from us in the last two years, this has remained stable at 93% for 2024-25. In the Bristol Water region, we measure the satisfaction of those on PSR regardless of if they have received a service or not.

Satisfaction continues to decrease from 88% in 2022-23 to 80% in 2023-24, and further reduced in 2024/25 to 78%. This is a slightly different measure to the one we have historically in the South West and Bournemouth regions. We would expect slightly lower scores overall given the different measure.

Lower levels of satisfaction in Bristol are primarily being driven by a growth in customers saying they are just not aware of PSR, which could be because of the increase in customers being added to Bristol's PSR via data sharing.

We also ask in our annual customer tracking survey across all areas about awareness of the PSR more generally:

- 51% of customers in South West Water and Bournemouth were aware of PSR in 2024-25.
- 24% of customers in Bristol were aware of the additional support offered through the PSR in 2024-25

From 2025-26. We are going to move to a consistent set of measures for PSR satisfaction and awareness across all our regions.



Our progress to date

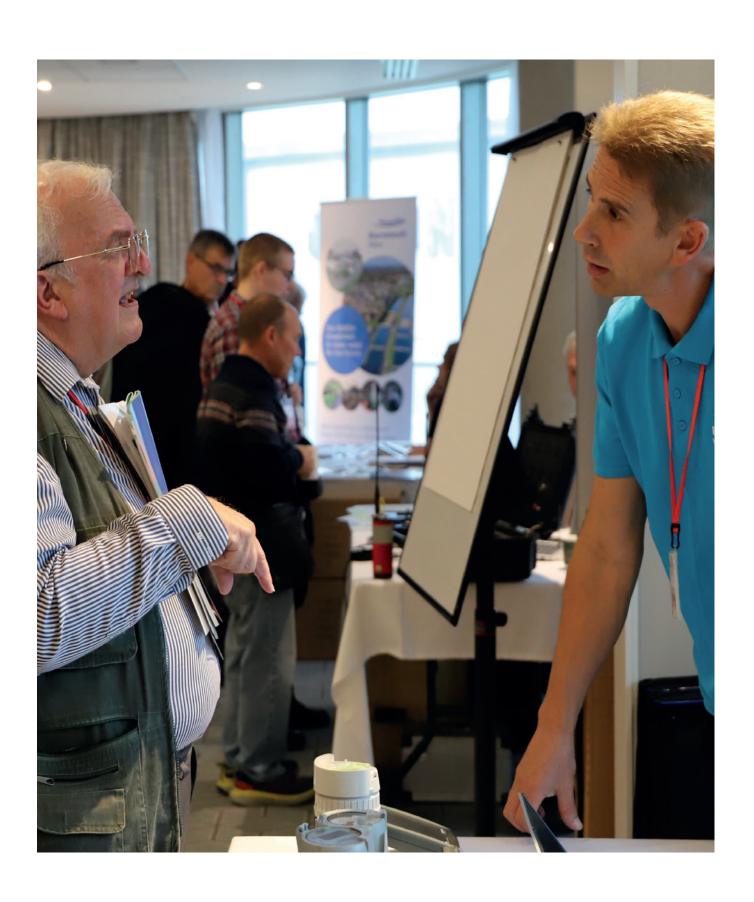
Across all regions, we have already exceeded our 2025 commitment for registering households onto Priority Services. We forecast this will grow to 24% by 2030. We are pleased with this progress but recognise there is more to do to meet customer expectations of the service.

Customers tell us we need to do more to increase awareness of the support on offer. They also say we need to provide a more consistent service during events such as length supply interruptions and extreme weather.

Our plans for 2020-2025 focused on growing our numbers of households registered on Priority Services Register priority services, working towards the national data share with Energy. Since then, we have worked through and served our customers through the Covid pandemic. This accelerated our plans for how we increased awareness and improved our processes to deliver on the needs of these customers. Our plans now, take these learnings forward so we can serve consistently all our customers who need additional help.

We will do this through using our data, growing partnerships, community engagement and customer journey improvements.





Using data wisely

Between 2020-25, we had a target to achieve 7% of households on our Priority Services Register.

We have exceeded this target through a range of projects.

We have established local data shares with National Grid and SSEN, and have automatically registered over 24,000 customers on our PSR after contacting their energy provider between 2020-24.

- As part of the WaterUK led initiative, we have established two ways data shares with Energy, from April 2023. We have been sharing data back to National Grid and SSEN as well as receiving it
- To achieve the targets to keep the Priority Service Register up to date with accurate information, we have used text messages, emails and letters to customers, supported with outbound calls where necessary
- Through data cleansing and confirmation of customer needs, we have been able to meet customer needs better because we have more accurate information.

	SWW attempted contact %	SWW PSR satisfaction % (based on a survey of those who contacted us)	BRL attempted contact %	BRL PSR satisfaction % (based on a survey of random sample of PSR customers who may or may not have been in contact)
2020-21	51.20	92	48.60	82
2021-22	90.36	83	91.10	89
2022-23	90.11	91	91.07	88
2023-24	90.48	93	95.09	80
2024-25	94.9	93	94.72	78

This will continue to be a foundation of delivering excellent service up to 2030, especially as more customers join our PSR.

This is an important part of achieving Ofwat and CCW's vision of joined up vulnerability data across both sectors. Our approach will see the number of customers on PSR register who require additional support further increase. Greater collaboration between water and other utilities can play a vital role in ensuring more customers who need extra support take advantage of the support that is available to them. It will boost take-up of priority services and help further improve awareness of assistance available to those who need extra help.

Growing partnerships

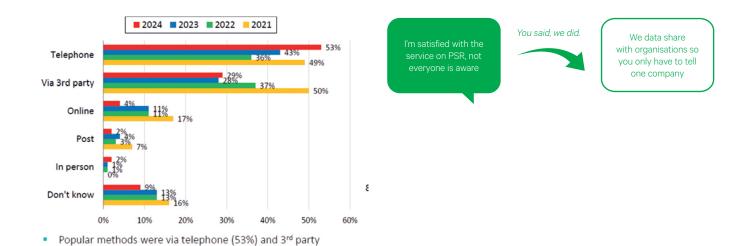
The Covid pandemic accelerated our plans to increase awareness of the Priority Services.

Our intention during the pandemic, which remains today, was to have all eligible customers registered on our PSR so we can ensure we service their needs with the additional care they require.

Our established network of partners helps us reach customers about our service. Partnerships help us reach different audiences through social media and the news, increasing awareness.

Our partners are not required to record the number of households they register for PSR. In the Bristol Water area we track how enrolling customers heard about the service.

Methods used to sign up to PSR



Base: 359 (those who knew they were on the PSR Register)

(29%)

Our strategy for non-financial vulnerability

We are always looking for new ways to rech people who could benefit from our help.

Our partnerships

Case study on supporting those most in need in our communities

Our partnership with Kidney Care UK

We are very proud to be working in Partnership with Kidney Care UK, supporting 4,604 people in our regions who have had a kidney transplant or are on dialysis either in a hospital or at home.

As part of our partnership we visited several Dialysis Centres to meet patients and discuss affordability and Priority Services with them. Patients and staff have been amazing and made us feel so welcome. These visits helped us understand what dialysis patients go through on a day-to-day basis, and why our support is so vital.

During one of these visits, we met Susan who is a Bristol Water customer. She was struggling with her bills but unable to contact us due to her health problems. We helped register Susan for

Priority Services and arranged for her bill to be paid directly from her benefits. As a pensioner on a low income, her bills will now be discounted. To tackle her debt, Susan is enrolled on our Restart scheme.

Susan agreed to be a case study for us and filmed her story with Kidney Care so we can demonstrate how we can help others in similar positions.

Watch Susan's story at: www.youtube.com/watch?v=Zsn2tzIh8MU



Debt Advice – Funded Partner Workshops

Since 2005 we have developed very successful partnerships with the debt advice sector and other organisations supporting customers who need extra help. We signpost to and fund these agencies.

It is never just about water; customers generally have multiple debts to multiple creditors. These trusted third parties are far better able to determine a sustainable offer of payment, however small, based on true ability to pay. In February 2025 we held our latest annual faceto-face workshops with our funded debt advice partners in the North and South of our region along with Bristol Water, Bournemouth Water, and South West Water. 33 attendees joined us from 27 organisations.

At the workshops, we gave an update on all our current initiatives to raise awareness and increase uptake of our affordability schemes and Priority Services and looked at the growth in the number of customers receiving help across our region.

We talked in groups about the challenges that the debt advice sector has, any barriers they might be facing when helping clients, and any improvements we can make to our affordability support and wider vulnerability strategy. We always enjoy this annual event and the opportunity to hear from our funded partners. It also allows them to network and share ideas, shaping our forward plans..



Community engagement

Over 2020-24 we worked with a number of small community groups to share our messaging. The events are often small and brief. They are used to promote multiple messages alongside PSR such as metering, water efficiency and bill advice.

Since submitting our strategy in October 2023 we now hold regular community roadshow events across the region. Customers can find out about upcoming events on our website and attend to speak with us about local issues and seek help.



Case study on community engagement to raise awareness our extra support





Food banks and clubs

We support food banks and clubs in the South West Water and Bristol Water regions. We attend sessions, provide training to spread awareness of our support to members of staff and customers. We also provide literature on support available. For example, we attended food club days in inner-city Bristol to discuss customer concerns and raise awareness of affordability support and priority services. We have also attended food club days in inner city Bristol to be on hand to discuss customer concerns.

Community housing partnerships

We have been working with Coastline and LiveWest Housing Associations to raise awareness among their tenants. During September and October 2024, our team knocked on 892 doors, engaging with 395 households and moving 82 customers onto a reduced tariff. After this success, we will be back knocking on doors in spring and summer 2025.

Customer journey

In 2020-24, we used an annual satisfaction survey to judge the success of our customer journey for people registered on the PSR. Our target is to maintain our BSI 22458 accreditation.

Looking ahead to 2030, we are committing to maintain the inclusive service provision ISO 22458 standard.

- We achieved and maintained the BS 18477 for SWW 2020-23
- We have achieved the new Kitemark BS ISO 22458 (which replaces BS 18477) for Bristol Water in Sept 2023 and South West Water in January 2024.
- A key foundation to accreditation was the re-designing of our websites and literature using gold standard Web Content Accessibility Guidelines, so it is more even more accessible.
- We have demonstrated robust staff training, how we learn from needed customer insight and how we service customers during an incident.

Staff training is critical to delivering a high-quality customer journey.

• Our staff are trained to identify triggers and signs that an individual may need some extra help from us, so when customers contact us, we will make their journey as simple as possible

- Our internal training programme is complimented and supported by external partners who have helped us shine a light, provide insight and awareness for our customer facing staff in recognising a customer in a vulnerable situation
- Staff have access on their mobiles to very short training modules with all the help they need to answer and service our customers registered on the PSR. This means if they are visiting a customer and unsure of the service, they can efficiently access the answer through their mobile device
- Training will be reviewed and expanded to make it more accessible for all staff
- From 2023, staff are now assessed on their knowledge on an annual basis
- Our training is supported by staff experts in vulnerability, spread across the business, they have additional external training and are leads in their teams for helping spot visible vulnerabilities and to provide coaching to colleagues in sensitive
- Our Lived Experience Group helps us challenge our customer journey, including written materials
- We have around 18 vulnerability heroes from across all areas of the business who are classed as subject matter experts. They are there to help staff support vulnerable customers. Heroes attend quarterly updates and sessions with our partners, for example Kidney Care UK.

Case study on our customer services & accessibility

How we've improved the accessibility of our support network

We have listened through our online panel surveys, our annual tracking surveys, taking insight from the CC Water Matters reports and through our design for compliance of BS ISO 22458.

Re-designed all three company websites using WCAG 2.1 Web Content Accessibility Guidelines with a view into 2025 to be compliant with WCAG 2.2 guidelines.

All companies' websites include the Recite Me tool which allows a customer to use a range of accessibility tools to enhance the already accessible pages to support their individual need, including translating our pages into a 100 different languages.

Introduced 24/7 web chat for South West Water and Bournemouth Water customers, so customers can speak to us on their channel of choice at any time of the day, this also removes the barrier of voice contact for some customers. Offering customers their choice of communication channel across telephone, web chat, web forms, email, social media, letter and WhatsApp.

Through training and accreditation, we further empowered our people to identify vulnerability, understand people's experiences and offer the right support package every time. We achieved the Kitemark for BS ISO 22458 inclusive service provision across all companies. We will be reassessed every year.

Training: Dementia Friendly, MIND, Diversity and Inclusion

The SignLive Service

In 2023 we introduced the SignLive service to all companies.

We partnered with SignLive to provide new ways for customers who use British Sign Language (BSL) to contact our teams.

SignLive is a deaf-owned and deaf-led company that understands the needs of customers and is dedicated to removing barriers to communication for those who are deaf.

We can offer a free video relay service that connects the customer to a qualified online BSL interpreter. The interpreter will relay the conversation between the customer and a member of our team.

SignLive can also be used for face-to-face conversations with our teams if they need to visit the home of a customer who uses BSL. It can be accessed easily through a mobile app..

Accessible Communication

Supporting customers who need extra care with a tailored service

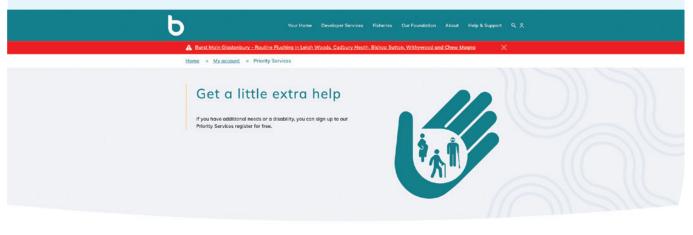
When customers sign up for priority services, we register their needs and send them a friendly welcome. We advise the customer of the services available to them. If customers ask for communications in a specific format such as large print or braille, wherever possible we do so across all our contact with them.

We have robust incident management processes that allow us to quickly identify affected customers who need extra support and can alert them via tailored SMS messaging. We will keep them updated and if they need additional support such as bottled water, we can support with this along with alternative water supplies if needed. We detail our approach across all our websites and signpost to this in our welcome letters so all our customers know how we will support them in an incident. We carry out post event surveys to any customer affected by a loss of water supply.

All our teams receive robust training in vulnerability and supporting customers and we invite external subject matter experts into our businesses to support our teams, most recently Mind and we have also received insightful training from The Centre for the Deaf in Bristol. All our field teams have access to a 'mobile' knowledge base so they can have instant access to support as and when needed.

Communicating with our customers who need extra support is critical. We have in place and will continue to provide:

- Tailored written communications as requested for example, braille, large print, different languages.
- Welcome information to the Priority Services Register
- A dedicated web page for what help to expect during an incident and how to prepare for an incident
- Bi-annual check in with all customers to ensure the needs they have are up to date
- We will expand the use of posters in our rural communities to signpost the help available when things go wrong
- Tailored communication for planned work
- Tailored communication for supply outages



Additional assistance, whatever your needs If you need extra support due to age, Ill health, disability, age or you even have a temporary change to your personal situation, we can help with our priority services register. What is Priority Services? Updates on supply interruptions + Priority Services is for customers who need extra support. By signing up for

Our plans for the future

We expect 24% of households to be on the Priority Services Register by 2030. We need to provide these customers with the right services, particularly supporting rural communities and digitally excluded people.

Our customers often need additional support during operational incidents. By 2030 we expect 24% of our customers to be registered with us on the PSR for support with bottled water during a supply outage. Therefore, we know there is a large demand for help.

We know, from our data led approach that in our region we are likely to have:

- Higher levels of rural communities, which makes access to bottled water, for example, from distribution points potentially challenging
- Higher numbers of elderly customers, who may need help with large print bills, or may be in poorer health
- Higher numbers of customers who are digitally disadvantaged; and therefore, we need to consider this in our communication strategy.

Having increased the number of customers we have identified and recorded as needing additional support, we need to deliver on the needs and expectations of these customers, as well as ensuring we continue to check and update the needs of those customers as we progress. In doing so, we will consider:

- Accessibility and communication channels for example, providing braille bills, translation of bills into other languages, an accessible website for all customers
- Support during supply interruptions prioritising those with the greatest medical need, such as those with medical dependency on water, or in rural conditions, the need to deliver higher levels of bottled water to individual households, rather than through distribution points
- Ensure we have excellent digital journeys, but also retain empathetic, 'warm voice' contact channels, such as telephone

- Training our staff to ensure they can identify all types of vulnerability and are alert for customers who may need support
- Ensure our staff continue to be a sustainable, agile and diverse workforce to reflect the diversity of our customer base
- Giving greater focus to the communication of the services we provide to those with specific needs, increasing awareness which we recognise to be lower than we would like
- If we fail to meet our promises to priority services customers, they are entitled to appropriate compensation. Defra will publish new guidance in 2025 setting out what compensation should be and when it should be paid. We will follow this guidance
- We will add a question to the annual survey so we can understand customer views on recording and sharing customer vulnerability data
- We commit to training all of our customer facing staff to be able to provide a tailored service for those customers who need extra support
- Front line staff will be supported by experts who receive additional training from partners.

We then use our focus areas to ensure we identify, support and engage with our customers in a tailored, supportive and empathetic manner.

In developing our Customer Care strategy, we have committed to focussing on these areas to support customers.

This centres around:

- Using data wisely
- Growing partnerships
- Community engagement
- Improving the customer journey.

We set out how this guides our strategy and the commitments we make below.

Using data wisely

By understanding our data we will:

- Prioritise customers with the highest priority in an incident, e.g. critical illness, so we provide water to the most vulnerable first
- Maintain our high levels of attempted and actual data checks of the PSR to ensure that we have an accurate
- Work towards two-way data share with energy suppliers to enable customers to sign up to PSR through either supplier. This will support our forecast to reach 24% of customers registered on the PSR
- We will continue to use our continual customer insight to improve the service we offer
- We will continue to use our annual tracker surveys for vulnerability and feedback from complaints
- We will continue to review segment scores across different customers groups to understand differing experiences and support our understanding of satisfaction and effectiveness of services
- This range of data sources of insight will help us monitor the effectiveness and the satisfaction levels of customers who need additional help.

Growing partnerships

We will continue to support partnerships to promote the PSR.

- We will explore new opportunities to partner with organisations
- Moving forward to 2030, we will now use the Water Poverty tool to identify partnerships gaps based on our coverage of support and data
- We will hold annual workshops with our partners, to gain their feedback on our proposed strategy and service to date
- Our partnerships provide a method for us to continuously improve the service we provide, as we can hear the feedback from our partners and share best practice that we can put into our strategy to provide a better service to customers who need extra help
- We will work with our partners such as AgeUK to ensure we increase awareness of inclusive services with older customer groups, we will particularly focus in Devon, Cornwall and Bournemouth where we have more than average amounts of this demographic

- We will grow partnerships, as we have with the Bristol Somali Resource Centre, to provide accessible information to communities where English is not the first language
- We will work with disability partners to promote the services we offer; this will help serve better the higher than average numbers of customers classified as disabled in the South West region.

Community engagement

Our community work will continue to be part of the wider community team, and we will use our knowledge of our customer base and underrepresented areas to target our activities in the most effective areas.

One of the new minimum expectations in the service for all guidance is that we need to take steps to understand the likely underlying requirements for extra help in their areas. To achieve this, we will use our data sources to refine which communities are likely to have customers who need additional help. We will enhance this by monitoring the engagement activities at our community events.

- We will use data to better understand our hotspots of digitally excluded customers, ensuring we are robustly and efficiently meeting their needs such as community events and printed rather than digital communication about the topics. This will help address our high levels of customers who are digital excluded in the South West Water area
- We will start to complete impact assessments of our community activities, review the level of interaction regarding additional support
- We will do this across all of our community activities and compare the results to what we expected of the region. This will help inform our future plans and community activities, so they are tailored to our customer needs
- We will use our community events to test new ideas and service options for customers who need additional care. Our community events are relaxed, customers are happy and have time to talk to us, it is a great opportunity to ask about new technology or literature that we offer. This builds on similar testing we have used our partners for (such as reviewing the accessibility of our Bristol Water website with Scope), we will continue to do this.

Improving the customer journey

A significant amount of change will happen in our customer journey pillar. Our goal to maintain the BS ISO 22548 will require annual audits, it covers many aspects of the customer journey, our training, governance and response from customer feedback. Above and beyond this accreditation, we have identified a number of projects to make the customer journey efficient, especially with the growing demand for this service.

Enhanced mapped journeys for our vulnerable customers	We want to revisit our customer journeys, and refine them in line with the needs of our PSR customers.		
Exploring operational and Priority Service's needs	In the South West Water area we have higher than average numbers of customers living in rural areas. We will grow our PSR to 24% as knowing who needs the help, makes it easier for us to service them right first time.		
	We will provide adequate support during supply interruptions, we will prioritise delivering bottled water to those with the greatest needs, such as those with medical dependency on water.		
	We will prioritise helping customers in rural conditions, with bottled water to individual households, rather than through distribution points.		
	We have service commitments as an internal document, for training and processes. We will make this a customer facing document, so it is available in print and online for our customers by June 2024. Customers who register for the PSR will therefore be clear of the expectation from our communication with them.		
	We will review the process and service offered across all of our brands, implementing the best, most efficient approach for all areas.		
Field teams sharing back to contact centre for PSR needs	We want to review the best process from across our brands for how our operational teams share information with customer services, and embed best practice. We will need technology improvements for our field teams to capture the same level of data as our customer services team. We will work to make this possible to make the customer journey easier.		
Consider Affordability flag for field teams and all call centre	We want to use all available technology to make it as easy as possible for all of our staff to identify customers who need additional support.		
To ensure we are able to deliver our plan we must ensure our customer service systems are able to deliver the best service to our customers, this is mportant element of our plan.	The upgrade of our billing and CRM systems will be progressed with a plan to be launched in 2025-30.		
We will review our customer promise, and include specific policies and promises for customers registered with us on the Priority Services	The review will include specific policies and promises for customers registered with us on the Priority Services and/or an affordability scheme. We will publish this, new across all of our brands during 2025.		
We will train our staff to identify and position support with older customers	We will ensure specific training to serve our older customers, helping serve the needs of the higher than average demographics of older people in our South West Water and Bournemouth Water regions.		
	We will expand our training to continue to be a Dementia Friendly Organisation. Our customer service staff already receive vulnerability including a specific Dementia Friends virtual training session. This will helps serve all customers who have dementia, including the higher than average levels in the Bournemouth area.		

New website for South West Water and Bournemouth Water

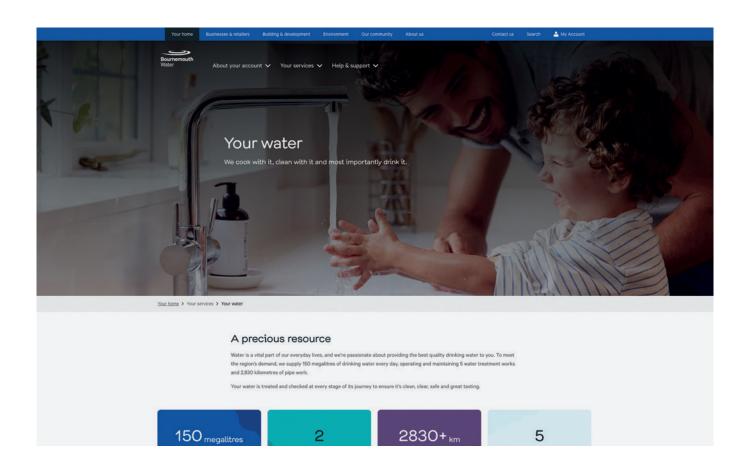
We listened to our customers who told us they want the same level of digital services and experiences from us that they get from other sectors.

- Customers want to talk to us online we have introduced WebChat and WhatsApp, giving our customers the same conversational experience as telephony operating 24/7
- Self-serve functionality we continue to enhance our self-service functionality so we can meet customer needs, including enabling customers to submit meter readings and generate statements at anv time
- Clear, intuitive, and easy to navigate websites we have redesigned our websites and literature using the gold standard web content accessibility guidelines and followed the CCW's recommendations on common language and simplification.

For Bristol Water, we will also add WhatsApp to our offering, making both WhatsApp and WebChat 24/7 to create a standardised service across Bristol Water, South West Water and Bournemouth Water

We are proud that our websites across South West Water, Bournemouth Water and Bristol Water follow five key aims and principles:

- Putting the users at the heart of what we do - simple, clean modern websites meeting our audience's needs
- Communicate value ensuring the websites are a platform that that tell the story of each brand
- Generate insight providing insight about customer and business performances
- Transcend the category surpass the digital experiences provided by other utilities
- Lay customer brand foundations using our websites to design our brand foundation.



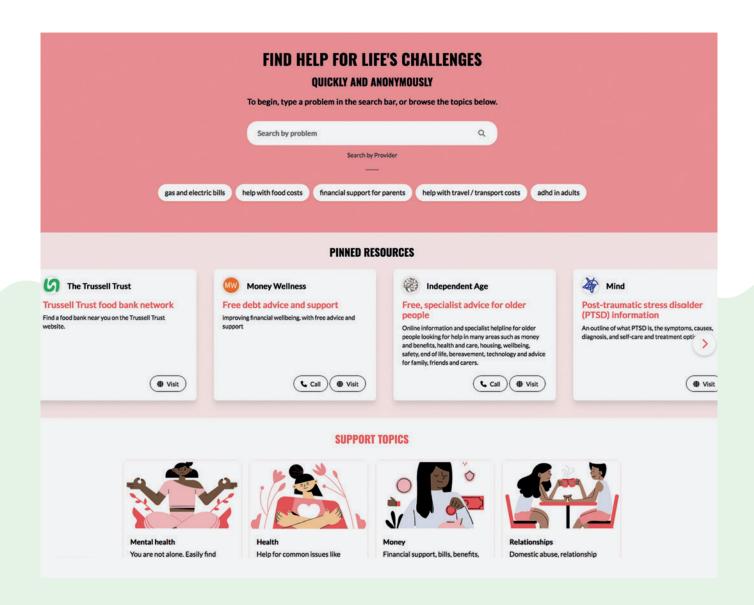
National Support Network - support services for customers in need

We have worked with National Grid and Wessex Water and teamed up with National Support Network (NSN) to go further in supporting our customers in need.

NSN maintains and operates a national support services directory ('Support Hub') to help customers find external services, such as helplines and access support for issues such as bereavement, insomnia, mental health, communication needs and more.

Our own branded version of the hub is available to all our teams who support customers whether that be over calls or when out and about meeting customers. The hub allows us to navigate sensitive conversations by signposting to the site so customers can self-help.

A link to the site is also available on our websites.



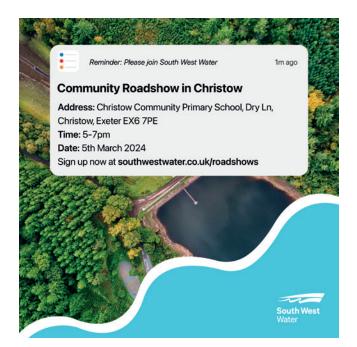
Christow Case Study

In March 2024 a community event was held in the village of Christow to provide an update on the water supply in the area. Customers in the village have experienced a number of interruptions with their water supply over the last year. The rural village has very limited phone signal which has meant we have adjusted our communication with the community to provide updates both on short term supply interruptions and the forward plans.

44 customers joined us at the school hall to hear about the plans for improving the reliability of water supply to the village. We also heard from the customers on ways to tailor our communication, as they don't always receive our text messages and can't easily access the internet. We have made a number of adjustments, such as providing information to their community WhatsApp group. The village asked for a poster with key phone numbers to call in an emergency to be able to be shared in the village. This has now been designed and will be rolled out across rural villages in 2024.



www.southwestwater.co.uk



. In some situations, we'll call on you, deliver letters and set up

community hubs



Dementia Bus

In December 24, the Dementia Bus visited Bristol Water allowing our teams to have a small insight into the challenges those with Dementia may face. With Dementia on the rise it is important we equip our teams with as many lived experiences as we can. The bus provides a first-hand experience of what dementia might feel like in the real world. One of our team who went through the experience had this to say:

'With dementia statistics scarily on the rise (it was 1 in 3 but now it's nearly 1 in 2 people that will be affected in their lifetime) I was lucky to grab myself a ticket to see firsthand how this new training was going to be delivered. I was intrigued.

With everyone gathered in the room, I was struck by the coldness of the trainer. No introductions, no saying what we were going to experience, just a stream of instructions. 'Off to a bad start' I thought. Then small groups were syphoned off, out of the room to the bus. When it was my group's turn, I was a bit apprehensive. What was going to happen?

Inside the 'bus', well, small van, we were given yet more instructions. We were told to take off our shoes and place spikey insoles in them, put on oversized gloves, some headphones, and a pair of glasses that were so obscured by markings and filters, it made it very difficult to see.

We were then led in turn, into a dark quiet space, until it wasn't. All of a sudden, lights began to flash, imagine 1970s disco, and a cacophony of noise hit our eardrums. Through the headphones came snippets of music... no, sirens... no, babbled talking... no, traffic... who knows, it was just A LOT! At first. I stayed glued to the spot, too scared to move around for fear of doing something wrong, breaking something, or bumping into someone. As time went on, I grew braver and sought out a corner to explore. I use the term 'explore' loosely. With my senses hindered, I groped around to find some familiarity, but there was none.

Every time I grew braver, something else 'happened to me'. Someone was giving me instructions, but what were they? Something about doing something in the kitchen? Someone was moving me about, but where was I going? Someone was putting an item of clothing on me, but what was it? Someone was patting me on the back and now touching my face. Someone needs to stop!

Eventually it did stop. And the lights came on, the noise ended, and I knew the training was over. And I knew why we'd been through that. We'd been 'in their shoes'. I genuinely have no idea how long the whole thing lasted. It could have been five minutes, or it could have been 15. I caught the bewildered eyes of my colleagues, and we all sighed a huge sigh of relief it had finished. Luckily for us, it could finish.



Our strategy for financial vulnerability

Understanding financial vulnerability and the risk of Water Poverty in our region

From our detailed analysis of our region, we understand that our customers may be at greater risk of financial vulnerability. This results from data which shows our region has:

- High percentages of customers experiencing multiple deprivation indicators
- Lower than average income levels
- Individual wards suffering from amongst the highest deprivation levels across the UK
- High numbers of households at risk of falling below an acceptable standard of living as a result of rising costs associated with the cost living.

This indicates that affordability of our bills is critical across our customer base, but that we also need to ensure that we identify and support those that may otherwise fall into Water Poverty.

What our customer research tells us

Understanding customers' views on affordability and value for money can be complex, and we ask about this in a variety of ways to ensure we understand each dimension and can triangulate our findings:

- How affordable customers find their bill: In South West and Bournemouth, 83% of customers reported that their bill was either very affordable or fairly affordable
- Concern about being able to afford their bill: In Bristol, 5% reported being concerned about paying their bill in 2024-25
- Satisfaction with value for money
- For our customers in South West Water and Bournemouth Water, the measure remained consistent in 2024-2025 with 2023-24 at 70% of customers reporting being either extremely satisfied, very satisfied or satisfied

• In Bristol the question is asked slightly differently and focuses on whether customers think the services provided by Bristol Water are good value for money. 68% reported they were either good or very good in 2024-25, up from 59% in 2023-24

We also try and understand how aware our customers are of our schemes.

Awareness of our schemes:

- 67% of customers in South West and Bournemouth are aware of at least one of the financial assistance options.
- In Bristol in 2024-25, 16% of customers reported being aware of support for customers struggling to pay their bills, this is down from 21% in 2023-24

Further research through the CCWater Matters customer research report in 2024 shows that awareness of our support schemes could be improved; with 49% of Bristol Water and South West Water customers being aware of our schemes. We are hearing that the support we offer is good, but that we need to do more to help raise awareness with those who need it but do not know that they can access it. We are looking to resolve this by proactively autoenrolling customers onto tariffs that will remove them from Water Poverty, without the need to identify, apply and receive financial support.

We will use data, community outreach programmes, partnerships and improved customer journeys to increase awareness of the support that is on offer.

¹ SWW Affordability survey Q3 year to date figures (2024-25)

² Bristol Customer Survey 2024-2025 final report

³ SWW Long term tracking survey full year results (2024-25)

⁴ Bristol Customer Survey 2024-2025 final report

⁵ SWW Affordability survey Q3 year to date figures (2024-25)

⁶ Bristol Customer Survey 2024-2025 final report

Our strategy for financial vulnerability continued

Cross subsidies provide additional support to customers who need extra help. Customers who are more able to afford their bills pay a small additional amount to support those who cannot afford to pay.

During 2023, research has been carried out to obtain updated customer views on their willingness to contribute to a cross subsidy through their water bill. The research found that our customers continue to support this contribution, this ranged from 77% to 79% across the three regions. This support is key to being able to keep all of our customers out of Water Poverty.

Willingness to contribute by area

Area	Mean Willingness to Contribute per year		
South West Water (Waste & Water bill)	£22.45		
Bristol Water (Water only bill)	£11.65		
Bournemouth Water (Water only bill)	£10.60		

Our progress to date

In our previous five-year plan, we made our industry leading ambition to eradicate Water Poverty by 2025. This was set for South West Water and Bournemouth Water, with a similar target independently set by Bristol, to achieve 0% in Water Poverty. We also set out our focus on ensuring affordable bills for all.

Our bills remain lower today in real terms than they were a decade ago, and we continue to work hard to ensure we are delivering efficient outcomes for customers. Our unique approach to affordability has included shareholder support through:

- Our WaterShare+ incentive scheme provides an opportunity for customers to own shares in our parent company, Pennon Group plc, or receive a credit to their water bill. This scheme has given over £38m back to household customers to March 2023 and will continue to share any outperformance in the future
- Our Stop the Drop campaign in Cornwall gave customers in Cornwall £30 off their bill for reducing their water usage and helping our Colliford reservoir recharge after the hot, dry summer of 2022.

• Our Water is Precious campaign helps customers save water and save money whilst protecting the environment.

The value of financial support and benefit to customers is significant with the total value of support to 2025 of £154.40m set to increase by 154% to £252.4m to 2030. A high-level breakdown of this is shown in the table on the next page.





Our strategy for financial vulnerability continued

Measure		2020-25	2025-30	% difference
Number of customers benefiting through support tariffs	Nr	87,066	109,681	26%
Financial assistance value by elements of affordability toolkit				
Financial Assistance from Support Tariffs	£m	£71	£167.7	121%
Financial Assistance from Debt Support Schemes	£m	£10	£18.8	271%
Benefit Entitlement Checks*	£m	£1.6	£0.5	-67%
Targeted Lowest Bill Guarantee and Water Efficiency - Lifting customers out of Water Poverty	£m	£4	£21.6	62%
Affordability Toolkit - Total Financial Value of Support and Savings	£m	£86.6	£208.6	148%
Community and Water Efficiency Funds	£m	£0.9	£2.0	77%
WaterShare+ and Stop The Drop Incentive	£m	£66.9	£41.8	-6%
Total value of support and savings	£m	£154.40	£252.4	154%

 $^{^{\}ast}$ BECs value 2025-2030 reduced as majority of customers eligible assessed in 2020-25

Our strategy for financial vulnerability continued

To achieve our target of eradicating Water Poverty, we have worked with CACI and ICS to develop a model that helps us find customers who are likely to be in need of our support. The model uses an extensive suite of data to identify the customers who are likely to need our help.

Using this tool, we have started to auto-enrol customers onto support tariffs, where we have identified that they are in Water Poverty. We have already enrolled 35,000 South West Water customers onto the WaterCare tariff in 2022-24, with more customers set to benefit from this innovative approach in 2024-25 and beyond.

Our innovative data suite also allows us to identify changes in behaviour, so we can to reach out to customers and offer support before they fall into debt.

This approach is supported by our affordability toolkit. This has a range of options to help customers lower their water bill, including switching to a metered tariff, payment breaks, water efficiency advice and home visits, low tariffs for customers who qualify and help with debt. Between 2025-30 we are planning to help 1 in 10 customers across all regions lower their bills through this support.

Our modelling has also helped us understand that to eradicate Water Poverty for South West Water in 2024-25. further unmeasured customers will need to be brought out of Water Poverty. These customers are some of the hardest to reach and often most vulnerable. They may not be able to apply for a meter if they rent from a landlord who refuses permission, and for others, switching to a meter may not be sufficient to bring them out of Water Poverty.

In response to this challenge, we are introducing the Assist tariff into the South West Water and Bournemouth Water supply areas.

Our strategy for financial vulnerability continued

The model, our methodology and the use of auto enrolment has been seen as a robust and innovative approach by industry and energy peers who believe this type of modelling to be a cross-sector first. We are looking to share this widely to ensure others benefit from understanding and considering our approach.

In addition, a data share with the Department for Work and Pensions (DWP) has started, through this we have been registering eligible customers directly onto our

schemes. We will continue to listen to our partners, evolve our process and customer journeys alongside our data tool to support all customers at risk and in Water Poverty as the bills increase over 2025-30.

In summary, from 2020-30 we will have seen a growth of customers on the discounted bill, and we have moved from supporting 45,000 of customers in 2020 to 110,000 of customers in 2030.

Case study on supporting customers in the Bristol Water area to lower their bills though our funded debt sector partnerships

In the Bristol Water region, the target of 0% of customers in Water Poverty has been achieved for the last four years. Between 2020 and 2025 we provided circa £368,000 to fund our debt advice partnerships. In the Bristol Water region, our partners have registered 1,714 customers directly onto our social tariff schemes during 2024/25, whilst at the same time providing debt advice

on all of their financial matters. During the early part of the cost of living crisis our debt partners made us aware of the challenges the sector was facing, in particular regarding capacity to serve all of their clients. We evolved our strategy to use the Water Poverty Tool to help identify customers at risk of Water Poverty and then started direct communication with them.

Region	2020	2025	2030
South West Water (including Bournemouth Water)	25,626	61,315	79,946
Bristol Water	19,027	25,751	29,735
Total	44,653	87,066	109,681

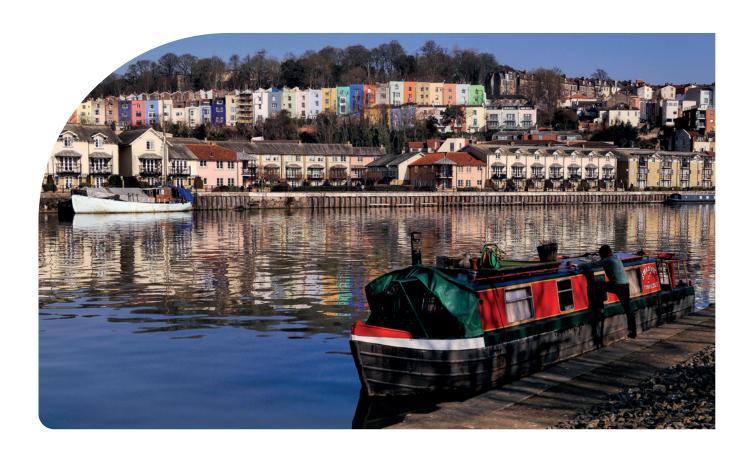
Leading indicators for financial vulnerability

We track leading indicators which provide early warnings of changes in financial vulnerability.

Following the Covid pandemic and subsequent cost of living crisis, we have provided CCW with regular updates on these indicators. To date we have not seen any significant changes to these measures, but we continue to monitor them so we can pick up on developing issues.

External indicators and macro-economic forecasts indicate that more customers will find it increasingly difficult to pay as inflation and housing costs begin to have a material impact. Inflation and interest rates are also affecting customers' ability to afford housing. This impacts renters more severely who are typically more financially vulnerable as fixed-term mortgage deals end.²²

Residents in the South West region South West Region (includes all our service area and more) are 5/12 across the UK for highest average debt, with an average of 13 debts (joint 2nd highest) and an average of 49% priority debts (joint 3rd highest). We will continue to monitor these leading indicators closely to ensure we are providing the right help to customers.



²² CCWater Matters 2022 Water-Matters-2022-Data-Report.pdf (ccw.org.uk)

Engaging with our Affordability Board

The FreshStart fund is available to help South West Water and Bournemouth Water customers who are looking for help with water debt. This is often because they may be new to debt and often, are dealing with an exceptional life event which means they would benefit from immediate clearance of their water debt. or short-term help with bills.

The fund gives customers the time and financial assistance to help them to adjust to these new circumstances – for example, if they're left with debt following the death of a partner, unemployment, relationship breakdown or illness.

Since April 2021 the fund has been administered in-house and a new Affordability Board was established. The main responsibility of the Board is to offer strategic direction alongside providing a voice for South West Water and Bournemouth Water customers. The board also ensures that affordability measures are applied consistently and supports our aim for all customers to receive a bill that is both affordable and value for money while receiving the highest level of service regardless of their personal circumstances. The board meets quarterly and reviews FreshStart performance and overall affordability performance.

We intend to extend this to cover the Bristol Water region for the 2025-30 period and continue to build on this initiative across all of our brands and provide £2.39m of support through this.

Providing support through partnerships

We know that customers often find it difficult to ask for help or may not be aware of how to access support. As a result, we take a partnership approach, ensuring we work with others to share the work we do and support we can provide to customers:

- Since 2017 we have had joint partnering with Wessex Water, and Bournemouth & Poole Citizens Advice providing funding for a 'Water Guru', for our Bournemouth Water customers. The Water Guru supports customers to get help with their water and sewerage bill as well as more general debt advice
- In 2024 we committed to funding Dorset and East Purbeck Citizens Advice following the introduction of their 'bus' which parks up in several public locations to encourage people to get the help they may need with debt advice
- Within the Bristol Region, our funded partners in the Debt Advice Sector have registered 1,714 customers directly onto our lower discount tariffs during 2024/25 In the Bristol Water region customers receive waste services from Wessex Water. Our customers in this area receive one bill for both services and all the help for customers struggling to pay is consistent for both services. Bristol Water and Wessex Water jointly fund debt advice charities to provide debt advice across the entire financial situation for customers most in need of affordability schemes. This ensures that customers receive holistic debt advice rather than just advice on their water debt.
- Customers have told us of the pressure and challenges they can face when seeking support. which for many people can be overwhelming and present a barrier to application. Working with and growing our many long-established partnerships with a variety of organisations across our region helping us to reach out . We will continue with our Hard to Reach projects up to 2030.

As we move forward to 2030, we plan to use our data to help identify areas where new partnerships would be beneficial and increase the amount of insight we gain from our partners through testing our forward plans with them on a more regular basis.

Addressing affordability and vulnerability

2020-25 has seen a number of changes and improvements to our customer journey for helping customers who need additional support. These were expedited as a result of Covid and the cost of living crisis. We have achieved:

- Lowest Bill Guarantee and Money Back Guarantee introduced for customers opting for a water meter South West Water have trialled dual billing and has also introduced the Lowest Bill Guarantee in 2023, which has opened to customers having a meter from April 2022. Bristol introduced the Lowest Bill Guarantee from February 2022
- We introduced a single application form for our South West Water and Bournemouth Water customers. Our revised Application for Support means customers only need to complete one form to applu for support, including tariff, debt support, payment plans and the Priority Services Register
- South West Water and Bournemouth Water customers can choose the best method of contact to apply for support, we now offer digital forms on our website, via telephone, webchat or WhatsApp, as well as keeping paper forms and downloadable forms available on our websites
- Fast track customer journey for our Assist social tariff, we apply a discount to lower their bill at the first contact, before the customer seeks debt advice which supported customers at the height of the cost of living crisis
- Covid Assist during Covid we changed our tariff so customers could join Assist without needing to
- WaterSure+ renewal we have reduced the customer effort of this process and made it digital.
- Customers can now also self certify on the medical element of their application
- We introduced IE Hub for our Bristol customers. which allows customers to apply online for schemes and also get independent debt advice.

Our controlled debt journey maximises customer opportunities to engage with us and lower their water bill using the affordability toolkit. The journey has been structured to offer comprehensive help and support from the outset.

Multiple communication channels present ample opportunity for the customer to engage. Text is written in a clear and concise manner, avoiding jargon. In recognition of the constant evolution of the financial environment, our processes allow us to intervene early where we judge this to be of benefit to the customer.

Amendments to the credit cycle can be made at an individual customer level, or at a broader basis in response economic pressures or events such as the pandemic or the cost-of-living crisis.

Our approach is to provide targeted and innovative data driven assistance which is sensitively tailored to the needs of the customer. We ensure that customer circumstances are fully understood so relevant support is offered as early as possible. Bespoke assistance on how to reduce water usage, and bills. is consistently delivered. Our strategy centres around sustainable payment plans to create habitual payers using payment methods that give us a quicker indication of affordability issues so we can intervene sooner and avoid debt building up.

Our commitment to aiding and supporting customers struggling with debt has seen the doubtful debt charge performance from 2020-21 surpass the AMP7 glidepath commitment each year. The target for 2024-25 has been achieved since 2020-21, presenting substantial efficiency and a 45% decrease on the doubtful debt charge of £16m in 2012-13.



Supporting customers with water debt - South West Water

Measure	2020-21	2021-22	2022-23	2023-24	2024-25
Forecast doubtful debt charge £m	£10.8m	£10.3m	£9.7m	£9.2m	£8.7m
Actual doubtful debt £m*	£8.6m	£8.6m	£8.5m	£8.4m	

^{*}Actual doubtful debt in 22-23 prices

Beyond the doubtful debt performance, we have presented a further efficiency of £1.3m across the AMP thanks to the in-housing of Telephony and Doorstep Collection activities. We recognise the unpredictability of a volatile financial environment and the challenges that can impose on our customers. Insight has been garnered from the pandemic on how to respond rapidly and effectively to customers who may be struggling.

Consideration has been placed on those who might be facing financial hardship for the first time. This group could be unaware of what support is on offer and will be unaccustomed to discussing personal financial matters. Our strategy has been to provide data driven targeted assistance, adapted to the needs of the customer.

Performance has been maintained by:

- Developing a reporting suite which offers innovative perspectives on both universal performance trends, and indicators at an individual customer level
- Embedding an empathetic and understanding culture within our collections team
- Initiating regular refresher training on available support tariffs
- Utilising external resources to monitor risk and to guarantee horizon scanning
- Ensuring our teams are supported as we acknowledge the testing environment in which they work.

The Paying Fair Guidelines were set out by Ofwat in 2022. We take our responsibility to help customers in water debt very seriously, we comply with 97% of the auidelines for South West Water (including Bournemouth Water) and 99% for Bristol and we have alternative approaches in place for the remainder. In early 2024 we also provided Ofwat with an update on our current position on our improvements and future plans

See Appendix 5 for more information.

Our plans for the future

We are acutely aware that increases to water bills, while critical to ensuring we are investing in our region and delivering the service our customers need and

want, remain a concern for customers. As such, we remain committed to ensuring we support all those customers who are at risk of being in Water Poverty across our region.

Our modelling tells us that we can expect to see the number of customers in Water Poverty increase in the coming years. Without any support through our affordability toolkit, our modelling currently forecasts there will be 92,174 in 2025 increasing to 129,546 by 2030, given increasing housing costs, lower income and rising water bills.

We are committed to achieving 0% of customers in Water Poverty in our regions by 2030, allowing us to ensure we are supporting all those customers who need it.

Our strategy for financial vulnerability continued

Our approach to affordability remains core to this and reflects:

Prioritisation	Firstly, and fundamentally, ensuring affordable bills for all customers; we do this by balancing investment priorities with bill impacts, driving efficiency to deliver value for money and ensuring our plans deliver key customer priorities and the statutory improvements needed now, while ensuring a fair balance in the impact on current and future customers.
Efficiency	Deliver the best value plan that is at the frontier of efficiency in our sector.
Fair charging	Using progressive charging to ensure costs are spread fairly across our customer base, with a particular focus on areas with high investment needs, such as near beaches and bathing waters. We also have to ensure water resources meet the needs of the resident population and the visitors who travel to the South West in large numbers each summer.
Water efficiency	Offering metered supply to unmeasured customers; this will ensure that we are providing the right tariff to the right customers and supporting them with water efficiency measures to enable the right consumption for those customers.
Support for those who need it	Proactively identifying and enrolling those at risk of Water Poverty onto our support tariffs, making support easy and ensuring we treat customers with respect and empathy.
	Efficiency Fair charging Water efficiency Support for those

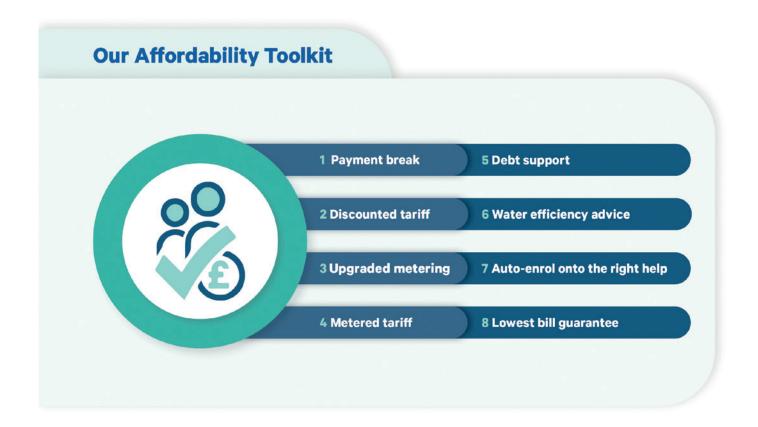
During 2024 we are introducing the Assist tariff into the South West Water and Bournemouth Water supply areas.

We are always striving to support our customers out of Water Poverty. Some customers will be unable to apply for a meter at their home, for reasons beyond their control. We have designed a new tariff to help these customers.

Moving customers onto a metered charge is always the first option for taking customers out of Water Poverty, but our Assist Tariff is now available for those customers who for whatever reason cannot have a water meter fitted or go onto our Assessed Charge.

The assist tariff is a way to support customers who are in Water Poverty but do not qualify for our WaterSure or WaterCare tariffs because they do not have a meter.

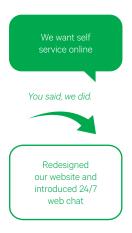
We focus in this strategy on our plans to ensure we have the right support for those who need it due to financial vulnerability; this also builds on our approach to water efficiency and upgraded metering.



Our affordability toolkit is fundamental to our approach. It has been updated using insights gained in 2020-23, to ensure it meets customer needs and reflects best practice and our wider plan. Changes include:

- Upgraded metering to help customers only use the water they need but we know some customers may limit the water they use beyond this, if they are worried about bills. We will therefore also proactively consider this by using our data to flag low users, so we can proactively contact them to talk through their usage and provide advice on their bill
- Customer side leakage identification (through upgraded meters) and support to help fix leaks, with additional support for those on support tariffs and priority services. We provide a free leak repair service tailored to individual customer needs, fixing leaks at no cost for the most financially vulnerable customers. We expect to repair around 7,500 leaks without charge in this way from 2025-30, a growth of 3%.

We tailor our social tariffs to meet customer needs. We offer a variety of social tariff schemes across our brands, we will review, consider and evolve the support we offer, with the goal to consolidate where we can. We will review the best of all the options we offer and listen to customer insight on what we can improve to ensure our customers receive the most effective help and support package.



Our strategy for financial vulnerability continued

Affordability toolkit support	Unit	2019-2020	2020-25	2025-30
Number of customers benefiting from support tariffs	Nr	44,653	87066	109681
Financial assistance by £ of our support tariffs	£m		£71	£167.7
Financial assistance by £ of our debt support	£m		£10	£18.8
Benefit Entitlement Checks	£m		£1.6	£0.5
Lowest Bill Guarantee and water efficiency – lifting customers out of Water Poverty	£m		£4	£21.6
Affordability Toolkit – total financial value of support and savings	£m		£86.6	£208.6
Community and water efficiency funds	£m		£0.9	£0.5
WaterShare+ and Stop The Drop Incentive	£m		£66.9	£41.8
Total value of support and savings	£m		£154.4	£252.40

Customers in our South West Water region no longer receive a £50 contribution from the government towards their water services from the 2025/26 bill, even though 88% of customers strongly believed this contribution should continue. With this level of support from customers, and the material difference it makes to affordability, we had assumed for the purposes of our Water Poverty modelling, that the contribution would continue to 2030. We have adjusted our models to factor in this contribution being removed.

We will use our focus areas to ensure we identify, support and engage with our customers in a tailored, supportive and empathetic manner.

This focuses on:

- Using data wisely
- Growing partnerships
- Community engagement
- Improving the customer journey.

We set out how this guides our strategy and the commitments we make below.

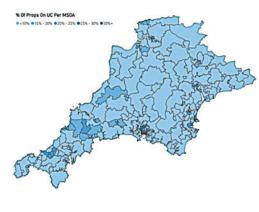
Using data wisely

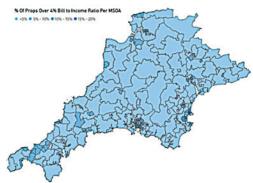
Our data tool means we can auto-enrol customers straight onto the most appropriate support scheme for them, potentially preventing them building up a water debt and reducing the need for them to contact us for help. We will take the first step and put them onto a scheme, or contact them if they might avoid Water Poverty by getting a meter or following water efficiency advice.

For customers who are struggling, this proactive approach means the water bill is less of a worry, without them having to do anything. If we do not have a contact preference, our customers are notified by letter of their auto enrolment and are encouraged to contact us if they believe they are entitled to more support.

We are able to achieve our challenging targets through our Water Poverty tool, which uses our suite of internal and external data to identify customers who are in Water Poverty, and proactively enrol them onto our schemes.

See Appendix 2 for the case study into how the Water Poverty Tool will support our customers in each region.





Our strategy for financial vulnerability continued

Support to remove customers from Water Poverty	Bristol Water Number of customers forecast to need help by 2030	South West Water & Bournemouth Water Number of customers forecast to need help by 2030
Water efficiency support	1251	2,922
Metering	1611	13,870
WaterSure	4,186	29,091
Social tariff schemes	25,549	55,514

Our Water Poverty tool will be updated quarterly. In addition to helping customers out of Water Poverty, it will be used to identify those who are at risk of entering it. This data will be reviewed at a community level and will underpin our decision making for the new initiatives we do in the community, and for our new partnerships.

This approach will be targeted to providing financial assistance, water efficiency and metering advice to customers who are not currently in Water Poverty, but who may still be income deprived. Through our partnership and community work, we hear from the community on how we can improve the customer experience, the services and help offered. From 2025-30 we will use this feedback to help target our help more efficiently, ensuring we have good coverage in the areas that need support the most.

Growing partnerships

We have funded circa £368,000 to our debt partnerships between 2020-25. In the Bristol Water region, we have an agreement with our partners that includes an annual workshop, training and guarterly reporting. Across our other areas, we work on an individual basis with our partners.

- Looking ahead to 2030, we want to evolve the partnership working across our area, to be able to hold regular workshops to hear their views on our offering and future plans
- Across 2025-30, we will use our data to support having effective partnerships across our region
- We will introduce annual partnership workshops across all of our regions, to update our partners on our future plans, to inform them of bill changes and to hear their views on our schemes. For example, as we look to evolve our affordability toolkit, we would provide early awareness of any changes and listen to their views on our proposals
- We will ensure we work towards good coverage of partnerships in the areas our data shows are most deprived and need the additional support
- We will ask our partners to help share case studies with us on our website and literature, either from our partners or if appropriate their clients.

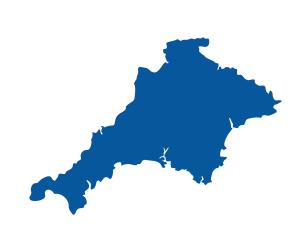
Community engagement

During Covid, we evolved our community activities rapidly. This enabled us to reach customers who needed help with their water bill, many for the first time. Prior to Covid, we had largely reached customers via in person events in the local community. Covid triggered us to evolve, switch to online channels and establish new partnerships, like the Village Agents, who could help provide help with the water bill to customers in rural communities who were digitally excluded.

This experience has taught us the value of evolving our community engagement, across different channels, targeted messaging to those who need it, and working with partners to help raise awareness.

We launched our largest ever community outreach programme with our significantly expanded Community Team, reaching over 4000 pupils in the last year.

- Looking ahead to 2030, we want to evolve the partnership working across our area, including CCW and Ofwat, to be able to hold regular workshops to hear their views on our offering and proposed future plans
- We will use our data tool and the knowledge of our customer demographics to efficiently target our community activities to the most needed areas
- We will ensure where we are in a community for an event, for example a WaterShare+ meeting, or a Community Roadshow, if it is an area that is also income deprived that we support with clear messages from our affordability toolkit
- In our analysis on the demographics of our region we identified that we need to visit communities that are rural, have high levels of digitally excluded customers and older people. We will target our engagement activities to reach these customer groups and ensure that we make it accessible to understand the help we have on offer.



Improving the customer journey

The customer journey is a critical aspect of any business, as it directly impacts customer satisfaction. By mapping the customer journey, identifying pain points, and implementing solutions to address them. companies can create a seamless, personalised, and memorable experience for their customers.

We will be reviewing and updating our customer journeys to incorporate the changes for our plans for 2025-2030. This will benefit all of our customers and their customer experience, there are a number of specific improvements we have identified to help improve the customer journey for those customers who need additional support with their bill.

- We will expand our upgraded metering programme and consider how to support customers with water efficiency and our wider affordability toolkit for customers who are trying to lower their water bill
- We will increase the water audits across all of our brands, providing tailored help for customers saving water
- In the Bournemouth Water region, we will be introducing compulsory metering. We will put meters in first to those who need a meter to be taken out of Water Poverty. We will create a customer journey to address worries that customers have about having a meter, water efficiency advice
- We will enhance our systems and digital platforms to deliver improved customer experience, supported by clear, accurate and timely information and bills for customers; we are planning to upgrade our billing and CRM systems which will enable better communications and engagement with customers
- We will look to incentivise our customers with schemes we have trialled in the past, for example our KickStart scheme, which incentivises disengaged unmeasured customers who have a debt on their account. The scheme would be to incentivise them financially when a meter has been fitted or if a meter can't be fitted on to assessed charges. Following engagement with the customer we will support the customer to ensure they get the support they need. We will plan to make this routine and across all of our regions by 2030.

Providing good debt journeys

We recognise that our approach to our debt customer journey must remain flexible and open to rapid modification to respond to the ever-changing challenges faced by our customers. Significant macro-economic changes make it difficult to predict performance in the collections space i.e., universal credit, the cost-of-living crisis is the biggest current factor for consideration alongside the perception of the water industry. Some of customers will face financial difficulties for the first time and discussing personal finances will be a new experience. Consequently, combined with our data guided approach, empathy will remain at the forefront of our values.

Up to 2030, our approach will remain adaptable and receptive to modification in order to react to shifting financial complexities.

To aid performance:

- A new billing and CRM system will be implemented to enhance the dynamic capability of collection activity
- Partnerships with Housing Associations and Councils will be advanced to progress data sharing capabilities to help customers receive affordability support in a timely manner
- Cross skilling of staff will aid adaptability and enable the practical use of resource availability across multiple departments
- Under the Digital Economy Act (DEA), utility companies have a unique opportunity to engage with Department for Work & Pensions (DWP) for data sharing purposes. We have implemented a data-sharing agreement in partnership with the DWP, which shows that the concentration of customers in receipt of support aligns with our analysis. The agreement allows us to validate our data further, so we can improve the affordability toolkit and auto-renew customers on tariffs.

We are also already using independent data, coupled with our own records on water bills and consumption to identify those in Water Poverty. We will proactively enrol these customers to provide financial support, with empathetic and tailored communication to explain the customer journey. We will ensure we provide a best in class customer experience by a clear, easy to understand, customer journey to our customers needing this additional support.

Paying Fair Guidelines

In 2022, Ofwat issued the Paying Fair Guidelines for the water industry. Extensive work was undertaken to review gaps in our service compared with the guidelines and implement the changes needed. Across our areas we have a small number of guidelines where we currently have alternative approaches, we have reduced the number of alternative approaches within the last year as we now use our bill envelopes to promote help with the bill and are using more customer case studies to raise awareness of the help available.

Struggling to pay? Get in touch.

We can help support you to reduce your bill or manage your payments

Our approach differs from the guidelines set out relating to the use and best practice of Credit Reference Agencies.

Our overarching approach is to have a direct, strong, tailored and personal relationship with our customers who may be struggling to pay their bill. This is even more important when set against the backdrop of the current cost of living crisis. As a result, we have deliberately chosen not to work with Credit Reference agencies as we feel their involvement can cause pressure for customers, particularly where any action we take can negatively impact credit scores.

Instead of using Credit Reference agencies to help identify customers who are in need of our support we have utilised our data to build a suite of early warning

indicators that allow us to make proactive early intervention to prevent customers falling into debt. Our extensive and innovative suite of internal and external data not only allows us to make proactive early intervention but also informs our plans, targets our support and community presence and allows us to identify at a customer level those who are in Water Poverty, and are in most need of our support. This is at the forefront or our ambition to eradicate Water Poverty by 2025 and again to 2030.

For our full response please see the Ofwat website²³.

We will ensure these action plans are part of our continued learning, adapted both from water and other sectors.

²³ ONS Impact of increased cost of living on adults across Great Britain: February to May 2023

Keeping on track

We are confident we'll be able to deliver the plans as set out in out in this strategy by 2030, if not before. We're committed to improving outcomes for customers who need extra help.

To make sure our strategy stays on track, we will:

- Publish our strategy on our website, to provide both accountability and visibility to our customers, and stakeholder groups.
- Review our strategy every year so it's kept up to date with any social, technological or regulatory changes. We promise to include our customers and stakeholders when we do this.
- Measure our progress against our key metrics.
- Provide regular reporting to our Board, challenge groups and stakeholders to make sure we're delivering against our strategy, and doing what we said we would.



Appendix 1 Definitions

In this section you will find definitions of terminology used throughout our customer care strategy, you will also find details of our commitments to standards and guidance.

Affordability

Ofwat's definition of affordability is: Affordability in the water sector is the ability of a customer to pay their water bill. It can be measured in a variety of ways, and we note that other regulators define affordability differently.²⁴ CCW's independent water affordability review used the metric of customers spending no more than 5% of their income (after housing costs) on their water bill.²⁵

Assessed charges

Assessed Charges for water and sewerage services will be offered where a domestic customer has applied for a meter but the cost of installing a meter would be unreasonable or it would not be practical to install a meter and where no agreement has been made for a single meter to serve more than one property.

Assist tariff

For Bristol Water's customers - This is Bristol Water's reduced bill tariff. A customer may be eligible for a reduced bill if they are experiencing difficulty in paying their bill, help can be given to make bills as low as £1 a month.

For South West Water's customers – This is a new tariff for 2024-25. It is a way to support customers who are in Water Poverty but do not qualify for our WaterSure or WaterCare tariffs because they do not have a meter. The tariff provides the same level of discount as WaterCare and is still based on the Bill to Income ratio however this is available to unmeasured customers.

Benefit entitlement check

A personal assessment that checks if a customer is receiving the correct amount and type of benefits dependent on their situation.

BS 18477 Inclusive service provision and ISO 22458 Consumer vulnerability standard

BS 18477:2010 Inclusive service provision has now been withdrawn and replaced with BS ISO 22458 Consumer vulnerability standard. The new ISO standard is based on BS 18477.

Bristol Water achieved certification to BS ISO 22458 in September 2023, while South West Water and Bournemouth Water achieved this in March 2024. South West Water and Bournemouth Water had been certified under BS 18477 since 2020-21.

The scope of the ISO standard includes identifying and responding to consumer vulnerability and the quality of services to our Priority Services Register customers, as well as our provision of services to all customers in vulnerable circumstances, whether or not they are registered for PSR.

Customer focused licence condition, Ofwat

In February 2024, Ofwat introduced a change to the license which includes a series of principles called the Customer Focused License Condition. This includes the Paying Fair Guidelines and Service for all.

Business customers in the Isles of Scilly will be covered by the requirements of this new condition until South West Water's obligations to them drop out of the licence on 31 March 2025.

²⁴ Ofwat-vulnerability-guidance-con.pdf

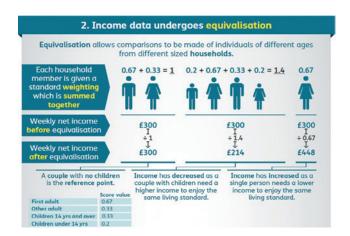
²⁵For example, Ofgem often focuses on definitions of fuel poverty, and Ofcom often refers to a good or service being affordable if consumers can purchase it without hardship

Equivalised income

Equivalised Income is commonly used within a Water Poverty calculation to take into consideration different household size and composition.

Equivalisation – An adjustment is made to income to make it comparable across households of different size and composition. For example, the process of equivalisation would adjust the income of a single person upwards, so their income can be compared directly to the standard of living for a couple. Different equivalisation scales are applied before and after housing costs, with the BHC example below. AHC scales can be found in our HBAI Quality and Methodology Information Report.

Equivalisation scales used in HBAI (Before Housing Costs)²⁶.



Our innovative Water Poverty tool uses an equivalisation method recommended by the Department of Work and Pensions, which is after housing costs (AHC). This is applied in the DWP's annual Housing Below Average Income (HBAI) reporting. This is done to provide assurance to customers who we have robust data and can proactively support those who need extra help.

Household Member	Modified OECD	Modified OECD 'Companion' Scale to Equivalise AHC Income		
First Adult	1	0.58		
Subsequent Adults	0.5	0.42		
Children aged 14 years and over	0.5	0.42		
Children aged 14 years and over	0.3	0.2		

Source: https://www.gov.uk/government/statistics/households-below-average-income-for-financial-years-ending-1995-to-2022/

²⁶ CCW, 'Independent review of water affordability', May 2021

Evidence for the Quality and Ambition Assessment - engagement and affordability

Our Evidence for the Quality and Ambition Assessment - Engagement and Affordability 2025-30 can be found in our PR24 document 'Engagement and Affordability'.

Financial vulnerability

The detrimental impact on finances.

Flexible payment plans

We can offer a range of flexible payment plans tailored to a customer's individual circumstances.

FreshStart

This is South West Water and Bournemouth Water's financial hardship fund. A customer may receive support from the fund to clear a new debt or short term help with bills following an extraordinary life event, for example following the death of a partner, unemployment, relationship breakdown or illness.

GC50 for South West Water customers

GC50 (£50 bill reduction) has been removed from PR24. This will mean an increase in bills for our South West Water customers. We will ensure those who fall into water poverty because of this will get the help they need.

Independent review of water affordability, CCW

CCW's affordability review released in May 2021 included 10 recommendations to support lifting households out of Water Poverty.

Index of Multiple Deprivation (IMD) 2019 rank

The Indices of Deprivation 2019 are a relative measure of deprivation for small areas (Lower-layer Super Output Areas) across England. The overall Index of Multiple Deprivation 2019 combines indicators under seven different domains of deprivation: Income Deprivation; Employment Deprivation; Education Skills and Training Deprivation; Health Deprivation and Disability; Crime; Barriers to Housing and Services and Living Environment Deprivation. Data shows Average LSOA Rank, a lower rank indicates that an area is experiencing high levels of deprivation.

We have used this to understand what differences our regions have compared to the England average. our strategy then explains how we will address these differences and serve the needs of our communities.

Innovative charging

Innovative or progressive charging piloted in 2023-24. Pilots for the new charges have been developed which have taken a systematic approach, comprehensively reviewing cost models to reallocate costs appropriately.

The principles and the exploration of the art of the possible in respect of progressive charging is to develop our innovative revenue-neutral charges that target behavioural change, affordability, and the environment.

Trials will be taking place in 2024-25 to understand the impact on water efficiency behaviour and affordability outcome.

Leak allowance

In certain circumstances we reduce charges due to leakage. This is based on the additional water lost during the leak.

Leak Stop

In the Bristol Water area, the 'Leak Stop' service provides a range of support for homeowners with private side leakage, including leak detection support, financial support towards repairing the leak and in house repairs for larger leaks. For customers who need additional support, both financial support and for customers registered on our PSR, we review each case individually and support to fix the leak for the customer with minimal effort or cost to the customer.

Lowest Bill Guarantee

In SWW. the Lowest Bill Guarantee ensures that the customer is not out of pocket if they have a meter installed. If the unmeasured charges end up being cheaper than the measured charge this is what we will bill the customer.

Low-income pensioner discount

This is a low-income pensioner discount for Bristol Water customers. A customer may be eligible for a discount if they receive Pension Credit or the State Pension as the sole source of their income.

Measured charges

Measured charges for water and sewerage services are paid by customers occupying properties which have a water meter installed. It is free to switch to a water meter.

Meter reversions

During the first two years after choosing to have a meter installed a customer can revert to unmeasured charges, this switch back is completely free.

Metering

We will continue to step up to the challenge of eradicating Water Poverty and doing the right thing by our customers by enhancing our metering policy.

Money-back guarantee

In the Bristol Water region, for customers who opt for a meter option we ensure that the customer is not out of pocket if they have a meter installed. If the unmeasured charges end up being cheaper than the measured charge, we automatically contact the customer to see if they would like to revert back to a rateable value charge and have the difference refunded.

Non-financial vulnerability

The detrimental impact on a customer's health or wellbeina.

Paying Fair Guidelines, Ofwat

Compliance with the overarching principles of the Paying Fair Guidelines will be upheld by ensuring any amendments, or new processes, will be verified against the values. Our underlying debt strategy incorporates flexibility and acknowledges the probability of the need to evolve to safeguard customer support. It is critical that any modification maintains the standards outlined by the Paying Fair Guidelines and embodies our own principles. By using the guidelines as a sounding board, we can confidently substantiate alterations.

Payment breaks

We offer our customers reduced or stopped payments for a short period of time.

Payment options

We offer our customers a range of options to pay their bill. this includes:

- Online
- Direct Debit
- By telephone
- At a Post Office
- By post
- At a bank
- Standing Order
- Directly through benefits, Water Direct.

Peter the Meter

Bristol Water's mascot. Peter the meter is our friendly Chief Metering Officer and is here to help us spread the message that water meters are good news.

Priority Services Register (PSR)

A customer can sign up to our Priority Services Register for free if they have additional needs or a disability. The customer will receive extra support based on their need, for example emergency water delivery, a large print bill or sending the bill to a named guardian.

ReStart

This is a debt support scheme offered to our customers across all regions.

Signposting

We will sign post our customers to relevant support if required.

Spotlight on our priorities delivering for customers and addressing affordability

Our Spotlight on our priorities - Delivering for customers and addressing affordability for 2025-30 can be found on our website.

Stop the Drop

A water efficiency campaign in the South West Water region as part of the drought response. Alongside a wider water efficiency campaign this included a customer incentive scheme, asking everyone in Cornwall to come together to help Stop The Drop in reservoir levels.

Supplementary tables, Ofwat

The supplementary tables that are submitted as part of the Price Review 2024 (PR24) submission, that supports Our Customer Care Strategy are:

- SUP14 Customer engagement and affordability/ acceptability of plans
- SUP15 Affordability support measures residential customers.

Voids

Empty and unoccupied homes are classed as 'Void properties'. Identifying void properties accurately and rapidly is imperative to ensure appropriate support is offered and accurate billing is guaranteed. Our void strategy is multifaceted, incorporating stringent governance of data gathering, internal doorstep visits to assess property status and data integrity assessments which utilise third party trace tools.

Unmeasured charges

Unmeasured charges for water and sewerage services are paid by domestic customers occupying properties which do not have water meters installed or who are not paying Assessed Charges.

Vulnerability

Ofwat's definition: "A customer who due to personal characteristics, their overall life situation or due to broader market and economic factors, is not having reasonable opportunity to access and receive an inclusive service which may have a detrimental impact on their health, wellbeing or finances."

Ofwat's service for all guidance²⁷ goes on to sav:

We believe that the sector's thinking has now developed further, and that the term vulnerability remains potentially divisive. For this reason, in our draft guidance in our draft quidance we do not use terms like "customers in vulnerable circumstances" or "situations of vulnerability". Instead we use the following terms:

- We use the term vulnerability to refer to the overall topic. This provides clarity for stakeholders and companies and reduces potential for confusion
- We use the term extra help to describe the many ways in which companies can provide tailored support for certain customers
- We use the term customers who need extra help to describe customers who without this tailored support may not have reasonable opportunity to access and receive an inclusive service.

Water audits

We offer water audits for South West Water and Bournemouth Water customers as part of our WaterCare+ scheme. It is an assessment of water and energy usage in a property by our trusted third-party supplier who will use these findings to recommend simple ways to reduce customer water and energy usage, reducing their bills. The auditor may also fix dripping types or leaking cisterns alongside installing simple water saving devices.

Water Direct

This payment option is available if the customer has a debt on their account with us and is paid directly through their welfare benefits.

Water efficiency

Using water wisely is essential to improving the water resilience of our network and to lowering customer bills. Water efficiency is driven through campaigns, education and providing customers with water saving devices.

WaterFit

The South West has some of the best beaches in Europe. With 860 miles of coastline, we know how passionate you are about swimming, surfing, paddling and bathing at our beautiful beaches.

That's why we are working hard to reduce the use of storm overflows. We're calling our programme of improvement – WaterFit.

Our WaterFit Live interactive map, is a way to give you the information you need the next time you want to visit your favourite beach. It will tell you if storm overflows near the beach may have temporarily affected the bathing water there.

You'll also be able to find more information about what we're doing to invest in your local beach and reduce the impact of our overflows.

Water Poverty

Water Poverty is defined as a customer spending no more than 5% of their income, after housing costs on their water bill for dual service customers, 2% for water only, 3% for waste only.

²⁷ Department for Work & Pensions, National statistics. Households Below. Average Income: an analysis of the UK income distribution: FYE 1995 to FYE 2022

Water is Precious

A water efficiency campain in the South West Water region. Conserving water for our future.

WaterCare+

South West Water created the WaterCare programme back in 2007, WaterCare+ programme was extended in 2013 to include energy efficiency advice and signposting. This service is offered to all South West Water and Bournemouth Water customers. This programme offers a personalised service to ensure they are receiving all the support available to them by:

- Checking they are getting all the benefits they're entitled to
- Making sure they are on the right tariff for the lowest possible water bill
- Carrying out a home water and energy audit and suggesting simple ways to reduce water and energy use
- Fixing dripping taps or leaking cisterns and installing simple water-saving devices.

WaterCare Tariff

This is South West Water and Bournemouth Water's reduced bill tariff. A customer may be eligible for a reduced bill if they are experiencing difficulty in paying their bill.

WaterSure Tariff

This is a bill cap tariff. This support scheme is provided by all water companies in England. Across Bristol Water, Bournemouth Water and South West Water, the bill cap is based on the average household metered bill.

WaterShare+

A scheme which first launched across South West Water and Bournemouth Water in 2020. Following a second issuance, it now covers the Bristol region too. As a result, more than one in 16 of our customers are now shareholders as well as customers.



Appendix 2 Water Poverty tool

Our Water Poverty case study

Data-led innovation

- We have partnered with CACI with the shared challenge to build an accurate, granular and up to date view of income, housing cost and equivalisation
- Working collaboratively, we have been able to develop a street level view of most recent and scaled bespoke equivalised income data at sixand seven-digit post code level (c12 properties) - the narrowest view that can be achieved
- We have used granular charging values applied to each customer's individual circumstances and current annualised consumption
- This has been coupled with a model developed by ICS which projects incomes and housing costs. The indexing is based on the March 2023 OBR Economic Outlook up to 2027-28 and is then supplemented in the final two years by time series modelling:
 - To bring all of the data together we have developed a bespoke model which allows us to refresh and produces visual outputs of customers and their characteristics
 - This has allowed us to identify, to a high level of probability, individual customers who are in Water Poverty and their characteristics
 - This method, which allows for regular updates and annual re-basing of equivalised income, allows us to identify changes of use and circumstances, identify customers who may have recently fallen into Water Poverty and those who may no longer need our support
 - The model has also been developed to calculate where a customer, based on occupancy, would benefit from a meter and whether metering would bring the customer out of Water Poverty.
 - The model also includes water efficiency scenario modelling which tells us where a potential 5% annualised efficiency could bring or prevent a customer falling into Water Poverty. This allows us to target water audits and free water saving devices.

We are able to use this method to model and arrive at a granular view of water poverty to 2030

- We have used granular charging values applied to each customers individual circumstances and current consumption (including the Bristol supply area)
- This has been coupled with a model developed by ICS which projects incomes and housing costs (mortgaged/no mortgage, private or social rent) to 2030 using OBR forecasts. These can be adjusted as or if the forecasts change
- The SUP 15 PR24 tables allows companies to calculate Water Poverty based on their own data and methodology where this may be more granular:
- In addition to our approach we have set out the following areas where our method differs and why including:
 - Our use of the AHC method of equivalisation
 - So that it is fair for single service customers we have used ratios based on SWW dual 2025-30 bills
 - 2% for water only, 3% for waste only and, 5% for dual service customers (vs. Ofwat 2.5% water and 2.5% clean).

Customers in our South West Water region currently receive a £50 contribution from the government towards their water services and 88% of customers strongly believe this contribution should continue. With this level of support from customers, and the material difference it makes to affordability, we have assumed for the purposes of our Water Poverty modelling, that the contribution will continue to 2030. This has a consequential impact on the level of assistance and support assumed in our modelling.

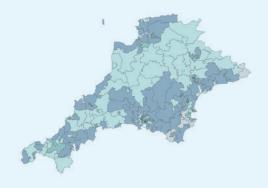
What does the model tell us?

- Who is likely to be in Water Poverty and where they are both regionally down to a customer level
- Their characteristics (age, occupancy, income, charging method and much more)
- If they had a meter whether based on average occupancy consumption would be brought out of Water Poverty and/or
- If they are on a meter and if they could make a small efficiency saving of 5% whether they would likely be brought out of Water Poverty
- From this we are able to calculate the support required for those who remain in Water Poverty at an individual and overall level
- This informs the cross subsidy, helps support our progressive charging ambition and allows us to produce and cost a detailed plan and develop the appropriate toolkit to maintain our industry leading aim to eradicate Water Poverty.

Outputs

• The outputs are subject to further iterations and final external assurance.

South West Water



Bournemouth Water



Bristol Water



Appendix 3 Non-financial vulnerability measures and actions

What measures we are monitoring

BS 18477/ISO 22458	SWW target	SWW actual	BRL target	BRL actual
2020-21	Achieved	Achieved		
2021-22	Maintained	Maintained		
2022-23	Maintained	Maintained		
2023-24	Maintained	Maintained		Achieved
2024-25	Maintain		Maintain	Maintain
2025-30	Maintain		Maintain	Maintain
PSR reach	SWW target	SWW actual	BRL target	BRL actual
2020-21	2.50%	4.56%	3.10%	2.60%
2021-22	3.00%	5.82%	4.10%	4.10%
2022-23	3.50%	7.85%	5.10%	6.50%
2023-24	5.00%	10.57%	6.10%	8.91%
2024-25	7.00%			
2025-30	24%			
PSR attempted contacts	SWW target	SWW actual	BRL target	BRL actual
2020-21	45.00%	51.20%	45.00%	48.60%
2021-22	90.00%	90.36%	45.00%	91.10%
2022-23	90.00%	90.11%	45.00%	91.07%
2023-24	90.00%	90.48%	90.00%	95.09%
2024-25	90.00%		90.00%	
2025-30	90.00%		90.00%	

Appendix 3 continued

PSR actual contacts	SWW target	SWW actual	BRL target	BRL actual
2020-21	17.50%	39.08%	17.50%	35.50%
2021-22	35.00%	55.49%	35.00%	53.20%
2022-23	35.00%	47.02%	35.00%	53.08%
2023-24	35.00%	61.95%	35.00%	59.57%
2024-25	35.00%		35.00%	
2025-30	55.00%		55.00%	
PSR Satisfaction	SWW target	SWW actual	BRL target	BRL actual
2020-21	73.00%	92.00%	85.00%	82%
2021-22	78.00%	83.00%	85.00%	89.00%
2022 22				
2022-23	83.00%	91.00%	85.00%	88.00%
	83.00%	91.00%	85.00%	88.00%
2022-23 2023-24 2024-25				

Non-financial vulnerability: our key priorities

Pillar	Commitments 2025-30	How we will achieve this	By when	Measures impacted
Using data wisely	Using data, we will identify customers in need of support from our vulnerability support	Across all our regions we will use data, both internally held and reliable external data to identify our hard-to-reach customers who are in most need of our support.	2023-25 2025-30	BS ISO 22458 PSR reach
		We will also continue to use social media, company newsletter and information on bills to reach customers.		
	Increase our use of data shares to help us target the most accurate support to customers who need it	Establish a two-way data share between Bournemouth and Wessex for PSR so customers in the Bournemouth area have the full support from both their waste and water bill.	2023-25 2025-30	BS ISO 22458 PSR reach
	who need it	Drive automation of two-way data shares.	2023-25 2025-30	PSR reach
		Two-way data share with suppliers.	2023-25 2025-30	PSR reach
		Explore PSR data shares with retail energy providers.	2023-25 2025-30	BS ISO 22458 PSR reach
	Explore IT options to help staff have the information they need to service the customer efficiently	Review the best use of our systems to flag specific customer needs for our staff to service them.	2023-25 2025-30	BS ISO 22458
partnerships	Identify partnerships gaps based on our coverage of support and data	Use our existing data on our partnerships, along with insights from the Local Insight tool to help us identify the most needed areas to explore new partnerships, e.g. in rural communities and to help the digital excluded communities access information about priority services.	2023-25 2025-30	BS ISO 22458 PSR reach
	Testing our future plans with our partners	Continue to host annual debt advice workshops in the Bristol Region, which include seeking feedback on our plans.	2023-25 2025-30	BS ISO 22458
		Establish annual workshops with our partners across Devon, Cornwall, and Bournemouth to gather feedback on our plans.	2025-30	BS ISO 22458
Community engagement	Using a data-led approach to focus our community engagement	Across all our regions we will use data, both internally held and reliable external data to identify our communities that need additional support from our digital customer communications and service to get the help they need.	2023-25 2025-30 2023-25 2025-30	BS ISO 22458 PSR reach BS ISO 22458 PSR reach
		Using the data tool to ensure the community strategy is tailored to the needs to the area.		

Pillar	Commitments 2025-30	How we will achieve this	By when	Measures impacted
Community engagement	Expand our messaging into our communities on water efficiency, metering and PSR through our staff	Spread awareness of our campaigns through staff, equipping them with literature and digital products to share. We will use our data to better understand our hotspots of digitally excluded customers, and ensure we are robustly and efficiently meeting their needs such as community events and printed rather than digital communication about the topics. This will help address our high levels of customers who are digital excluded in the South West Water area.	2023-25 2025-30	BS ISO 22458 PSR reach PSR satisfaction
	A multi-channel community engagement strategy including social media, face to face, pop up stalls, literature. Targeting the best channel to reach the customers who can benefit from the messaging	We will use our data to help us target the best channel to reach the customers who can benefit from the messaging. We will ensure this includes the key priorities for our customers this is currently understanding storm overflows impacting their local beach, water efficiency and keeping bills low through metering or a tariff.	2023-25 2025-30	BS ISO 22458 PSR reach
	We will start to complete impact assessments of our community activities, review the level of interaction regarding additional support	We will do this across all of our community activities and compare the results to what we expected of the region. This will help inform our future plans and community activities, and that it is tailored to our customer needs.	2025-30	PSR reach
	We will use our community events to test new ideas and service options for customers who need additional care	Our community events are relaxed, customers are happy and have time to talk to us, it is a great opportunity to ask about new technology or literature that we offer. This builds on similar testing we have used our partners for (such as reviewing the accessibility of our Bristol Water website with Scope), we will continue to do this. Extending the concept to customers in the community is a new minimum expectation from Ofwat's draft vulnerability guidance.	2025-30	PSR satisfaction

Pillar	Commitments 2025-30	How we will achieve this	By when	Measures impacted
Improving the customer journey	Achieve and maintain the inclusive service provision	Maintaining the ISO 22458 standard.	2023-25 2025-30	BS ISO 22458
	Robust customer journeys to service the needs of all customers registered with us on PSR	Review the services our customers register for, what we promise we must and should deliver, ensure that all our staff are equipped and trained to understand and deliver the expected service.	2023-25 2025-30	BS ISO 22458
	Invest in our IT systems to provide a more efficient and effortless customer journey	We will upgrade our customer services systems to provide a dynamic customer journey, this will support all customers in all journeys.	2025-30	BS ISO 22458
journe vulner Explorand P needs Field to back to for PS We will to ide support custors	Enhanced mapped journeys for our vulnerable customers	We want to revisit our customer journeys, and refine them in line with the needs of our PSR customers.	2025-30	BS ISO 22458
	Exploring operational and Priority Service's needs	We will make a customer facing view documents of the services we offer for each need. We will review the process and service offered across all of our brands, implementing the best, most efficient approach for all areas.	2023-25	PSR satisfaction
	Field teams sharing back to contact centre for PSR needs	We want to review the best process from across our brands for how our operational teams share information with customer services, and embed best practice. We will need technology improvements for our field teams to capture the same level of data as our customer services team. We will work to make this possible to make the customer journey easier.	2023-25	PSR satisfaction
	We will train our staff to identify and position support with older customers and expand our dementia friendly	We will ensure specific training to serve our older customers, helping serve the needs of the higher than average demographics of older people in our South West Water and Bournemouth Water regions.	2023-30	PSR satisfaction
	canning	We will expand our training to continue to be a Dementia Friendly Organisation. Our customer service staff already receive vulnerability including a specific Dementia Friends virtual training session. This will helps serve all customers who have dementia, including the higher than average levels in the Bournemouth area.		



Appendix 4 Financial vulnerability measures and actions

What measures we are monitoring

Customers in water poverty/ % of customers find their bill affordable	SWW target	SWW actual	BRL target	BRL actual
2020-21	89.00%	89.40%	0.00%	1.00%
2021-22	92.80%	93.30%	0.00%	0.00%
2022-23	95.20%	96.60%	0.00%	0.00%
2023-24	97.60%	98.00%	0.00%	0.00%
2024-25	100.00%		0.00%	
2025-30	100.00%		0.00%	
Number of customers on a support tariff	SWW target	SWW actual	BRL target	BRL actual
2020-21	27000	30565	20419	20419
2021-22	30000	32255	21209	21209
2022-23	33000	43239	22723	22723
2023-24	40000	62297	24237	26806
2024-25	50000		25751	
2025-30	79946		29735	
Voids	SWW target	SWW actual	BRL target	BRL actual
2020-21	0.91%	0.84%	1.90%	1.80%
2021-22	0.89%	0.83%	1.90%	1.80%
2022-23	0.87%	0.86%	1.80%	1.79%
2023-24	0.85%	0.84%	1.80%	1.70%
2024-25	0.84%		1.80%	
2025-30	TBC		TBC	

Financial vulnerability – our key priorities

Pillar	Commitments 2025-30	How we will achieve this	By when	Measures impacted
Using data wisely	Using data, we will identify customers in need of support to remove them from Water Poverty, we will auto enrol them onto the right support where we can and proactively contact those who need improve their water efficiency or switch to a meter to be taken out of Water Poverty	We will auto enrol them onto the right support where we can and proactively contact those who need improve their water efficiency or switch to a meter to be taken out of Water Poverty.	2023-25 2025-30	Water Poverty Customers on a support tariff.
	We will use intelligent data sets to target our affordability support	Across all our regions we will use data, both internally held and reliable external data to identify our hard-to-reach customers who are in most need of our support. We will use data to evolve our toolkit and allow our support to go to those in most need.	2023-25 2025-30 2023-25 2025-30	Water Poverty Customers on a support tariff. Water Poverty.
	Increase our use of data shares to help us target the most accurate support to customers who need it	Drive automation of two-way data shares. Establish a two way data share between Bournemouth and Wessex for customers on a social tariff and voids, so customers in the Bournemouth area have the full support from both their waste and water bill. Explore financial support data shares with retail energy providers.	2025-30 2023-25 2025-30 2025-30	Water Poverty Customers on a support tariff. Water Poverty Customers on a support tariff. Voids. Water Poverty Customers on a support tariff.
	Use more case studies to help customers connect with us	We will ask our partners to help share case studies with us on our website and literature, either from our partners or, if appropriate, their clients.	2025-30	Water Poverty Customers on a support tariff.

Pillar	Commitments 2025-30	How we will achieve this	By when	Measures impacted
Growing partnerships	Identify partnerships gaps based on our coverage of support and data	Use our Water Poverty tool and existing data on our partnerships, along with insights from IMD to help us identify the most needed areas to explore new partnerships, e.g., in rural communities and to help digitally excluded communities access our financial support.	2023-25 2025-30	Water Poverty Customers on a support tariff. Value for money.
	We will listen to our FreshStart board	Continue to work with and be challenged by our FreshStart board to ensure grants support the right customers.	2023-25 2025-30	Water Poverty. Value for money.
	Testing our future plans with our partners	Continue to host annual debt advice workshops in the Bristol Region, which include seeking feedback on our plans. Establish annual workshops with our partners across Devon, Cornwall, and Bournemouth to gather feedback on our plans.	2023-25 2025-30 2025-30	Value for money. Value for money.
Community engagement	Using a data-led approach to focus our community engagement	Across all our regions we will use data, both internally held and reliable external data to identify our communities that need additional support from our digital customer communications and service to get the help they need. Using the data tool and new technologies to ensure the community strategy is tailored to the needs in the area.	2023-25 2025-30 2023-25 2025-30	Water Poverty Customers on a support tariff. Value for money. Water Poverty Customers on a support tariff. Value for money.
	Annual refresh our messaging into our communities on our key priorities relevant to the communities we are working with	Spread awareness of our campaigns through a variety of channels including social media, newsletters, partnerships and staff, equipping them with literature and digital products to share.	2023-25 2025-30	Water Poverty Customers on a support tariff. Value for money.
	A multi-channel community engagement strategy including social media, face to face, pop up stalls, literature. Targeting the best channel to reach the customers who can benefit from the messaging	We will use our data to help us target the best channel to reach the customers who can benefit from the messaging.	2023-25 2025-30	Water Poverty Customers on a support tariff. Value for money.

Pillar	Commitments 2025-30	How we will achieve this	By when	Measures impacted
	We will work closely with our communities to educate the next generation, tailoring the content based on the community needs	We will expand our Education Program content to other areas including bill paying and support available, matching appropriate content to a larger age range, covering all our service area.	2025-30	Water Poverty Customers on a support tariff. Value for money.
Community engagement	We will support our customers & communities through our community funds. We will ensure where we are in a community for an event – for example, a WaterShare+ meeting, or a WaterFit pop-up event – and if it is an area that is also income deprived, that we support with clear messages from our affordability toolkit	Continue to provide our customers access to our neighbourhood fund and Water-Saving fund.	2023-25 2025-30	Water Poverty. Value for money.
Improving the customer journey	Introducing upgraded metering to help customers take better ownership and lower their water usage and bill	Rolling out upgraded metering to provide our customers with information they need to conserve water and lower their bills.	2023-25 2025-30	Water Poverty.
	Campaigns to encourage customers to pay for what they use and lower their bill	Lowest Bill Guarantee.	2023-25 2025-30	Water Poverty.
	Invest in our IT systems to provide a more efficient and effortless customer journey	We will upgrade our customer services systems to provide a dynamic customer journey, this will support customers in all journeys including customers needing support through our debt journeys.	2025-30	Water Poverty. Value for money.
	Use of data shares to enhance the customer journey	We will continue to work with DWP to ensure support tariff customer journeys are supportive through renewals and takes the pressure off customers.	2023-25 2025-30	Water Poverty Customers on a support tariff.
	We will explore new partnerships to help customers in water debt	We will explore partnerships with Housing Associations and Councils will be advanced to progress data sharing capabilities to help customers receive affordability support in a timely manner.	2030	Water Poverty Customers on a support tariff.
	We will complete grow the amount of water audits we complete	We will plan to expand our water audits across the group.	2025	Water Poverty. Value for money.

Appendix 5 Paying Fair Guidelines

Since the last publication of our strategy we have provided Ofwat with an update on our compliance with the guidelines, this was in April 2024.

We are compliant with 97% of the principles for South West Water (including Bournemouth Water) and 99% of the principles for Bristol Water.

We have alternative approaches for these remaining principles. We have outlined our rationale below.

Use of credit reference agencies (1.32 - 1.35)

We have alternative approaches in place across all of our supply area for the use of credit reference agencies.

Our overarching approach is to have a direct, strong, tailored and personal relationship with our customers who may be struggling to pay their bill. This is even more important when set against the backdrop of the current cost of living crisis. As a result, we are not working with Credit Reference agencies as we feel their involvement can cause pressure for customers, particularly where any action we take can negatively impact credit scores.

Instead of using Credit Reference agencies to help identify customers who are in need of our support we have utilised our data to build a suite of early warning indicators that allow us to make proactive early intervention to prevent customers falling into debt.

Our extensive and innovative suite of internal and external data not only allows us to make proactive early intervention but also informs our plans, targets our support and community presence and allows us to identify at a customer level those who are in Water Poverty, are in most need of our support and can be the hardest to reach. This is at the forefront or our ambition to eradicate Water Poverty by 2025.

To do this we have partnered with CACI, combining this data with DWP and ONS information alongside actual bill data so that we can identify, proactively engage with and auto enrol individual customers who are in Water Poverty onto support tariffs. Over 8,000 customers have been auto enrolled onto support tariffs this year since being launched in July.

Customer testimonies (4.2)

Principle 4.24 relates to 'Highlighting customer outcomes and testimonies on resolving debt problems to encourage other customers to contact you'. We are delighted to have two new case studies in place highlighting how we can support with financial and non financial vulnerability.

We have worked closely with Kidney Care UK in the Bristol area and for South West Water and Bournemouth we have followed the journey of a customer who had debt and accessed the help available.

Displaying financial support on envelopes (1.20 and 5.4)

The final two principles (1.20 and 5.4) relate to displaying financial support on envelopes. We have recently updated South West Water's and Bournemouth Water bill envelopes to include a signposting message for financial support and how we can help. Bristol Water already had this messaging.

This will raise awareness to the support on offer and build trust with our customers.

Our approach remains under continual review, and we always welcome input from Ofwat and other stakeholders.

No.	Principle detail	High-level summary of current approach	Proposed changes	Timing
1.32	Use credit reference agency data to help identify customers who: - May qualify for support	We don't currently share our data with Credit Reference Agencies.	Implementation of our new billing system may change our approach to using credit reference agencies to improve	2025-2026 following the implementation of a new billing
	 Be at risk of falling into debt; and Can afford to pay and can be contacted for payment. 	Instead, we use Acorn data alongside other intelligence about the customer held on our billing system to determine the appropriate debt recovery pathway.	our decision making and help identify those who may be financially in need of support earlier in the process.	system across all.

Appendix 6 Service for all vulnerability guidance

Ofwat released new vulnerability guidance 'Service for all' in October 2023. The below table shows the objectives and minimum expectations.

Vulnerability strategy submission guidance

No.	Minimum Expectation	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 offer enhanced services for those who need extra support, these are critically important during an incident. Our systems allow employees to be aware that a customer may require an adaptation to the normal service, due to a customers need. Supported with training and clear procedures our staff are able to identify the customers need and tailor the service accordingly for every interaction. During an incident, we use the data in the systems to prioritise the customer need and efficiently service those who need the extra support most urgently. The services we offer include: Knock & Wait Bills in different formats Password Nominee Tailored communications Bottled water Additional meter readings Signpost to financial help Free meter move Additional presence preferred	Bi-annual audit of customer records ISO audit	Meeting a target of 55% actual contacts on the PSR does have practical challenges	As highlighted in Our Customer Care Strategy: PSR attempted contacts 90% PSR actual contacts 55% (above the PR19 commitment levels and BS ISO 22458)
1.2	Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.	Compliant	We encourage and support our customers to join our Priority Services Register in a number of ways, including data shares, conversations with staff, partner referrals and direct applications. It is an important part of the customer journey. To help customers be clear what needs they have registered, this is confirmed in communications welcoming them to the service. It is specifically covered in: The PSR welcome letter and supporting information, which can be found on our websites https://www.southwestwater.co.uk/incident and https://www.bristolwater.co.uk/incident-management	See our comment on the challenges	Automated process to provide customers their specific service relevant to need. No industry/ standardised view of best practice for presenting "in a way customers can understand"	BS ISO 22458

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
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	Through our work with Partnerships we seek feedback from our Partners who are experts in supporting vulnerable customers and communities. We use our annual partner workshops to seek feedback on our strategy. We work with a wide range of charities in the community to learn from others, share ideas and improve the service for all. Our Lived Experience Panel asks customers and stakeholders views on how we can improve service and new innovation that can incorporated for customers who need extra support.	Feedback annually from our Funded Debt Partners	-	Annual collection and sharing of feedback from our partners
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	Using Data Wisely underpins our strategy for supporting customers who need extra help. We monitor the satisfaction with the service of customers on the PSR through tracking surveys and report this result annually. Our ongoing customer research hears from customers through out post event research, real time feedback and complaint satisfaction, all specifically cover customers on the PSR. CMeX data is reviewed and actions taken to improve the customer service for all.	Tracking surveys for PSR are audited	-	95% satisfaction with service on PSR via tracking survey (as highlighted in Our Customer Care Strategy)
2.1	Companies should interact with customers in a way that is inclusive for a diverse range of audiences. This should be underpinned by relevant insights, which may include research, engagement and accreditation.	Compliant	We accredited with the BS ISO 22458 Kitemark for Inclusive Service and have committed to maintain this through to 2030. We have a range of options for customers to have additional support with communication, including large print, bills read over the phone, braille, alternative languages. Our websites have recite me so customers can change the language into one of 20 choices We have interpretation services available for customers who need it. Sign Live - colleagues have technology available, as does the website to have support with BSL Customers can have a nominee and/ or an additional presence preferred, this means they can have a specific person with them during a face to face visit.	ISO	-	BS ISO 22458

Draft vulnerability strategy submission guidance

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
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 provide a wide range of communication for all customers: WhatsApp Telephone Webchat Webform Social Media Email Letter In person These tailor to customers on the PSR depending on need, see cell C8.	CMeX audit ensures we have at least 5 communication channels	-	CMeX compliance to minimum channels
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 value the input from CCW, Stakeholders and other customer representatives, especially when changing customer journeys and we use our established relationships with them to discuss our ideas. When making changes specifically impacting customers need extra support we discuss with CCW and also the most relevant partner or customer representative to gather their expert view.	Written feedback from CCW, Stakeholder and Customer representatives	-	Publish update in annual strategy

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
3.1	Companies should take active steps to identify customers who require extra help who have not yet been identified.	Compliant	We have set a target to achieve 24% of customers on the PSR. This is based on our best understanding from the data available. We use data to model where we have local regional gaps and then we match our outreach programme to promote awareness of the help available. Our 'Using Data Wisely' strategy focuses on using data from the Local Insight tool and Water Poverty tool to inform our strategy We run community outreach events on a very regular basis and ensure support for PSR and affordability is represented. Staff are trained to ask customers if they or anyone in the home needs to be on PSR.	Progress towards the 2030 target Monitor levels of PSR referrals from field staff at an individual level Data insight tool identifies areas where additional support is needed		PSR reach 24% at 2030 (as highlighted in Our Customer Care Strategy)
3.2	Companies should take steps to proactively increase customer awareness of the extra help available to those who need it.	Compliant	We use broad communication to all customers including newsletters, newsletters, bills, website, social media. We use community outreach events and partnerships to target the areas where we believe a higher density of the population would need additional support.	-	-	-
3.3	Companies should train their staff to spot potential requirements for extra help, even when a customer has not previously declared it.	Compliant	Training is critical to ensure staff feel confident spotting potential signs of customers needing additional help. Our strategy to improve the Customer Journey includes the company induction, which introduces the services we provide and this continues through eLearning modules. The eLearning pathways are provided to the roles that require it, not for all staff. This is supplemented with external expert training including MIND, Centre for Deaf in Bristol, Dementia Friends which is for staff who are experts in this area, and support colleagues with their training. We provide internal training for subject matter experts in relevant roles.	ISO 22458	-	BS ISO 22458

Draft vulnerability strategy submission guidance

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
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	On average 80% of customers on our PSR are through a data share and we are performing better than our target on the number of households on PSR, already exceeding the March 2025 target. Our strategy of 'Using data Wisely' has resulted in us having very established data shares with National Grid and SSEN and in recent years have expanded data shares to Councils for affordability. Where we can see customers would benefit from the PSR, e.g. in receipt of pension benefit we would put them on PSR. This is an area that continues to grow and develop.	Progress towards the 24% PSR reach target	Complexities of creating data shares	PSR reach 24% at 2030 (as highlighted in Our Customer Care Strategy)
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	There are several ways we may become aware of a customer needing additional support. As part of our strategy for improving the customer journey we ensure that these feed into a dedicated team who are training to ensure the records are accurate, the customer is informed through the welcome pack of the service they will receive and the data is securely stored in our systems. In situations such as domestic violence, staff are trained on how to manage this with the additional steps to protect the customer. We ensure that all staff who need to be able to tailor their service to provide the appropriate need have visibility needed on their systems.	ISO GDPR training	-	BSISO 22458
4.2	Companies' records should be reviewed regularly to ensure they are up to date.	Exceeding	In line with the PR19 performance commitment, which we exceed in, all records are audited every two years.	Audit	Meeting a target of 55% actual contacts on the PSR does have practical challenges	As highlighted in Our Customer Care Strategy: PSR attempted contacts 90% PSR actual contacts 55%

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
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	Our PSR matches the needs codes of of the energy industry to enable efficient processes and reduced customer effort. We have made changes so this applies to all our supply areas.	-	-	-
4.4	In designing their approach to recording and, where relevant, sharing customer vulnerability data, companies should clearly explain to customers how their data will be used, including any choices available to them. Companies should take steps to understand how their customers who need extra help feel about the use of their data.	Compliant	We ensure through our processes and training that we are clear with customers how their data will be used. This is communicated through the initial contact, the registration process, followed up with a welcome letter, our privacy statement on our website. From 2024-25 we are asking customers through our tracking survey for their views on data sharing.	Tracking surveys for PSR are audited	-	95% satisfaction with service on PSR via tracking survey (as highlighted in Our Customer Care Strategy)



Draft vulnerability strategy submission guidance

No.	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
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.	Exceeding	We have had a strategy in place for a number of years. We have committed to refreshing it every year. Our Customer Care Strategy, the precursor to our finalised vulnerability strategy, was published in October 2024 and was included in our PR24 business plan submission.	ICG, Ofwat.	-	Publish update in annual strategy
5.2	Companies should take steps to understand the likely underlying requirements for extra help in their areas.	Exceeding	Our Customer Care Strategy published in October 2024 used data to show areas that needed extra support. This underpins our strategy and will continue to be used and refreshed annually.	ICG, Ofwat.	-	Publish update in annual strategy



Priority services registers - standards for water companies April 2025

include:

outages or incidents:

presence during visits

dealing with a customer);

outside the company; and

• Delivery of alternative water supplies during an interruption; • Knock and wait facilities (where visiting staff know to allow

· Additional communications, contact, or support around

 Additional metering support or services by the company; • Alternative communication formats such as braille, audio information, large print, etc; • Arrangement of additional

• Third party support (where a nominated trusted contact is allowed to manage a customer's account on their behalf); Password facilities (where staff use a password when

• Signposting to other support and services, both within and

• Priority contact before or during actual or potential outages to understand impact and / or ask if further support needed.

extra time for customers to answer the door):

All companies that have household customers should establish and maintain a Priority Services Register (PSR) which contains details of PSR customers. This will allow water companies to meet the requirements set out in the below standards, and the minimum expectations of Ofwat's Service For All vulnerability guidance as detailed above.

Compliance Minimum Expectation Implementation Needs and Services Compliant We have in total 29 needs codes that customers can register for on our priority Needs: services. These include all detailed here Customers who are likely to benefit from being on the PSR and also others that fully encompass all include those who meet one or more of the following criteria: reasons a customer may need to register. • Of pensionable age: They are aligned with energy and data • Are disabled; sharing. • Have an illness which affects their day-to-day life; • Are pregnant or live with children aged 5 and under; We provide a raft of services to support Have a mental health problem; customers based on their needs. We • Have a hearing or sight condition; document information on our websites on • Have a poor sense of taste or smell; the support we offer during incidents. • Are unable to or have difficulties in communicating in **English or Welsh**; We do advise of services within our • Have a cognitive impairment, learning disability, welcome letter sent to all PSR customers. developmental conditions or dementia; but we recognise that this could be more • Require additional showering or bathing due to a health robust and we will make improvements. condition; · Have physical impairments; or · Are going through a disruptive life event, such as bereavement. Services: Companies should provide customers on their PSR with relevant services or service adaptations. These are likely to

Priority services registers - standards for water companies April 2025

Minimum Expectation	Compliance	Implementation
Reach All companies should make all reasonable endeavours towards having a comprehensive picture of PSR service requirements of individual customers in their area. This will require all companies to grow their PSRs beyond the levels achieved by incumbent companies during the 2020-25 period.	Compliant	We use data mapping and CACI Acorn data to show where we have potential gaps of those who may have medical needs and are not on the PSR. This allows us to focus efforts in geographical areas to promote PSR. We have promised to increase our PSR reach to 24% by 2030.
Data Checking Companies' records of customers' PSR service requirements should be kept up to date and reviewed with an appropriate degree of regularity. At minimum, all companies should: • achieve actual contact with 35% of households on the PSR every two years; and • attempt contact with 90% of households on the PSR every two years.	Compliant	We have been achieving this metric since PR19 and we have promised to continue with this check in with increased numbers on the PSR.
Registration When customers request to be added to the PSR, companies should implement this within relevant systems as soon as possible, and relevant support services provided as soon as possible. When customers have been added to the PSR, companies should actively confirm this with the customer, for example, through a welcome letter or email.	Partial compliance	We send welcome letters to all customers who register for the PSR and highlight the services available. We recognise we can tailor this more and we will do this when making the changes to our communication to include compensation payment information for our PSR customers. To be confirmed by Defra during 2025. We send our communications in the way a
This communication should provide information about the support that customer will receive. In particular, this communication should be clear about the circumstances in which the customer can expect different types of support. For example: bottled water deliveries in the event of a supply interruption of a certain duration. This communication should be made available in accessible formats. It should also include details of how to contact the company, in case the customer's needs change		we send our communications in the way a customer has requested. We already have dedicated website pages on how to prepare for an incident and also what happens in an incident. This includes tailored needs codes information on bottled water delivery

Appendix 7 Inclusive service provision ISO 22458 Consumer vulnerability standard results

	Start date of last assessment	Certified activities	
South West Water/ Bournemouth Water	January 2025	BS ISO 22458 Consumer Vulnerability - the design and delivery of inclusive service	No non conformities with action plan in place
Bristol Water	August 2023	BS ISO 22458 Consumer Vulnerability - the design and delivery of inclusive service	No non conformities



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Isles of Scilly

Please refer to South West Water website for Isle of Scilly services.









